

Notes of February 18, 1994 Meeting
Giant Refining Company & Hazardous & Radioactive Materials Bureau

Giant was represented by Lynn Shelton and David Paulich. Representatives of HRMB included Tom Tatkin, Barbara Hoditschek, Marc Sides and Ron Kern.

The purpose of the meeting was to come to a resolution on how to proceed with permitting requirements as a result of the noted Permit violation. The violation was that hazardous constituents were detected below-treatment-zone.

The options proposed to Giant were to continue with modifying operational aspects of the Permit that could correct releases, or to close the permitted RCRA unit.

No matter which of these options are pursued by Giant, the below-treatment-zone characterization in all three treatment cells is necessary to define the extent of contamination.

Giant discussed the possibility of a partial closure, where the two most active cells could be characterized for hazardous constituents in and the below-treatment-zone. The third, less used cell could then be characterized for baseline data in the below-treatment-zone, and continue to operate under the current Permit, unless baseline data from cell 3 indicates that contamination has migrated below the treatment zone.

The outcome of the meeting was that Giant would respond to the discussed topics in writing within ten to fourteen days. The response will include the decision of how Giant would like to proceed (voluntarily close cells 1 and 2, while using cell 3 for continued treatment, or close all 3 cells), and a time-frame for submittal of a contaminant characterization plan of cells that might be closed. Plans for characterization are to be included in a modified closure plan. Thirty to forty days was the feasible time-frame discussed by Giant representatives for plan submittals.

All in attendance agreed that the five-year review of the Permit should be a separate issue from permit violation/cell closure issues. The five-year review will be revisited at a later date, after closure and characterization have been resolved.

An interesting consideration is that the only permitted waste placed in the unit since Land Band restrictions became effective has been D001 wastes, and these have not been placed in the unit since 1990. Currently, only non-hazardous wastes (containing hazardous constituents) are being put in to the unit. Non-hazardous wastes amount to about 200 tons per year and consist of mostly sludges with a 40 to 50 percent moisture content.

HRMB recommended that no wastes, including non-hazardous wastes, be put in the unit until after the unit is fully characterized.