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Gallup, New Mexico
87301

505
722-3833



*Barbara
Hoditschek
Tom
Tatkin*

March 3, 1994

Ms. Barbara Hoditschek
Permit Program Manager
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
525 Camino De Los Marquez
Santa Fe, New Mexico 87502

Re: Partial Closure of Giant Refining's Land Treatment Area

Dear Ms. Hoditschek:

I would like to thank you, Tom Tatkin, Mark Sides, and Ron Kern for taking time out of your busy schedules to meet with Lynn Shelton and me on February 18, 1994. We appreciated the opportunity to talk with you regarding Giant's Hazardous Waste Land Treatment Area (LTA) and some of the options available to address the concerns about the LTA.

As we discussed in our meeting, Giant proposes to proceed with a partial or, potentially, complete closure of the LTA. If a partial closure is elected, it would consist of the closure of cells 1 and 2 of the LTA. Complete closure would encompass cells 1, 2, and 3.

Giant will be developing a plan for characterizing the LTA in preparation for closure activities. We anticipate that the characterization plan will be available for review by your staff by approximately April 1, 1994. If the plan is acceptable, Giant proposes to proceed promptly (within the constraints of weather) with the characterization. It is anticipated that the characterization results and a modified closure/post-closure plan would be ready for your staff's review within 90 days of approval of the characterization plan.

As a result of the concerns about possible waste migration in the LTA, Giant has suspended application of waste materials into cells 1 and 2 of the LTA.

Should you or your staff have any questions regarding the above, please do not hesitate to contact Lynn Shelton or me at (505) 722-3833.

Again, thank you for your time and assistance in resolving this matter.

Sincerely,

David C. Pavlich

David C. Pavlich
Health, Safety and Environmental Manager
Giant Refining Company

DCP:sp

cc: Kim Bullerdick, Corporate Counsel
Giant Industries Arizona, Inc.

Lynn Shelton, Senior Environmental Coordinator
Giant Refining Company

John Stokes, Refinery Manager
Giant Refining Company