

NEW MEXICO
ENVIRONMENT DEPARTMENT

1994 AUG -5 AM 11: 27

OFFICE OF THE SECRETARY *KS*

GIANT
REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

Barbara
Ron K

August 2, 1994

Allyn M. Davis
United States Environmental Protection Agency
Region VI
1445 Ross Avenue
Suite 1200
Dallas, Texas 75202-2733

Re: Additional RFI Sampling

XII

Dear Mr. Davis:

In the letter from you dated January 7, 1994 (copy enclosed), Giant Refining Company - Ciniza (Giant) received EPA's approval of Giant's recommendation of "No Further Action" on SWMU #1, the Aeration Basin; SWMU #2, the Evaporation Pond; and SWMU #13, the Drainage Ditch. The agency's approval of the "No Further Action" recommendations was accompanied with several additional requirements.

The additional requirements were to repeat the sampling protocol set forth in the approved RFI Sampling Plan (May, 1990) biennially. This additional sampling is intended to monitor potential migration of hazardous constituents from these SWMUs during the duration of their active service.

Giant understands the logic of continued sampling to document potential migration but has some reservations about the frequency of sampling and the true potential for migration of hazardous constituents.


It was determined in the RFI sampling (1990-1992) that migration of hazardous constituents had not occurred in any of the previously mentioned SWMUs and that water saturation had not occurred below five feet. This observation, coupled with the fact that hazardous constituents are not released to the three SWMUs, indicates that future contamination due to migration of hazardous constituents is virtually impossible.

Based on this knowledge, Giant proposes to sample SWMUs #1, #2, and #13, using the protocol set forth in the approved RFI Sampling Plan, every five years, beginning in 1995, with annual reports due on December 31 of the sample year. This sampling will adequately

demonstrate migration, if any, of hazardous constituents. Giant appreciates your prompt attention to this proposal, as this will expedite completion of any responsibilities of Giant to fully characterize and monitor SWMUs #1, #2, and #13.

If you require additional information, please contact me at (505) 722-0227.

Sincerely,



Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

TLS:sp

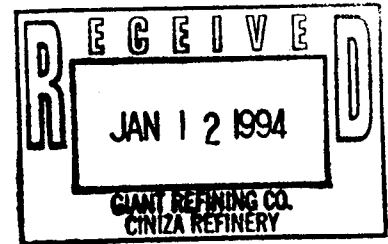
cc w/attachment: David C. Pavlich, Giant
Kim Bullerdick, Giant
Rich Mayer, USEPA
Kathleen Cisneros, NMED



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JAN 07 1994



CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. John J. Stokes, Manager
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

RE: RFI Phase I and Phase II Supplemental Reports and
Voluntary Corrective Action Plan
Giant Refining Co.
NMD000333211

Dear Mr. Stokes:

The Environmental Protection Agency (EPA) hereby approves your RCRA Facility Investigation (RFI) Phase I Supplemental Report, dated October 21, 1991, with the enclosed list of modifications. Your Corrective Action Plans (CAPs) for the Sludge Pits and the Railroad Rack Lagoon, submitted in November and December, 1992, respectfully, are also approved with the enclosed list of modifications.

The EPA is requiring that additional monitoring be completed at several sites. An annual report detailing the monitoring results shall be submitted to the EPA by December 31, 1994, and each year thereafter. The EPA is also requiring that additional soil sampling be completed at the Sludge Pits and the Tank Farm. Sampling results shall be submitted to the EPA by October 1, 1994. Further information concerning the additional monitoring and sampling requirements may be found in the attached list of modifications.

If you have any further questions or need additional information, please contact Nancy Morlock at (214) 655-6650 or Richard Mayer at (214) 655-7442.

Sincerely yours,

Allyn M. Davis, Director
Hazardous Waste Management Division (6H)

Enclosure

cc: Kathleen Sisneros, NMED

**APPROVAL WITH MODIFICATIONS
RFI PHASE I SUPPLEMENTARY REPORT
RFI PHASE II REPORT AND THE
VOLUNTARY CORRECTIVE ACTION PLANS**

The Environmental Protection Agency (EPA) has completed a technical review of Giant Refining's RCRA Facility Investigation (RFI) Phase I Supplementary Report; RFI Phase II Report; and voluntary Corrective Action Plan (CAP) for the Sludge Pits and Railroad Rack Lagoon. The subject reports are hereby approved with the following comments and modifications.

GENERAL COMMENTS

SWMU 1, The Aeration Basin; SWMU 2, The Evaporation Pond; and SWMU 13, The Drainage Ditch

The EPA agrees with the finding of no further action for Solid Waste Management Units (SWMUs) 1, 2 and 13. The EPA is, however, requiring periodic monitoring of these SWMUs (see below under Modifications). However, this approval is contingent upon the completion of a survey plat for these SWMUs. The survey plats shall be completed in accordance with the requirements set forth in 40 CFR 264.116. Giant shall submit copies of the completed survey plats to the EPA for review and approval. Upon approval, Giant may submit a Class III permit modification to terminate the RFI/Corrective Measures Study (CMS) process for these SWMUs.

SWMU 6, The Tank Farm

The EPA disagrees with Giant on their recommendation of no further action. Sampling results indicate that 9 of the 13 samples taken at the 11 foot interval (the deepest interval sampled) contained elevated levels of BTEX constituents. One sample at the 16 foot interval also contained elevated BTEX levels. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications).

SWMU 8, The Railroad Rack Lagoon, Overflow Ditch and Fan Out Area

The EPA agrees with the finding of no further action for this SWMU. The EPA understands that Giant has elected to perform voluntary corrective measures at this unit which will include bioremediation of the wastes with periodic soil and waste monitoring. Giant's voluntary bioremediation should reduce the volume and toxicity of the wastes while continuing to periodically monitor the SWMU. The EPA will, however, require that additional monitoring be completed (see below under Modifications). The EPA is also requiring that a survey plat be completed for this SWMU. The survey plat shall be completed in accordance with the requirements set forth in 40 CFR 264.116. Giant shall submit a copy of the completed survey plat to the EPA for review and approval. Upon approval, Giant may submit a Class III permit modification to terminate the RFI/Corrective Measures Study (CMS) process for this SWMU.

SWMU 6, The Railroad Rack Lagoon

Giant shall take 5 soil borings within the lagoon after it has ceased receiving wastes. Three (3) of the five (5) borings must be sampled at the 0-1 foot interval. All borings must be sampled at the 5-6 foot interval, the 10-11 foot interval, and the 14-15 foot interval. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Sampling results shall be included in the 1994 Annual Monitoring Report.

Additionally, all six (6) borings required under the CAP closure (Section 5.0) must be sampled at the 5-6, 10-11, and 14-15 foot interval. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Sampling results shall be included in the appropriate Annual Monitoring Report.

Monitoring requirements under the voluntary CAP shall be submitted to EPA in the appropriate quarterly progress report. Giant shall notify the EPA when final closure of the Railroad Rack Lagoon has been initiated.

Continuation of SWMU 6, The Overflow Ditch

Giant shall complete three (3) soil borings in the Overflow Ditch after closing the Railroad Rack Lagoon. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Soil samples shall be collected at the 3.0 - 4.0 and 6.5 - 7.0 foot interval. All results shall be included in the 1994 Annual Monitoring Report.

Continuation of SWMU 6, The Fan Out Area

Giant shall complete four (4) soil borings in the Fan Out Area after closure of the Railroad Rack Lagoon has been completed. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Soil samples shall be collected at the 3.0 - 4.0 and 6.5 - 7.0 foot interval. Results shall be included in the 1994 Annual Monitoring Report.

SWMU #12, Contact Waste Water Collection System (CWWCS)

Giant shall perform an inspection of the CWWCS every five years beginning in calendar year 1996. The inspection shall be identical to the one performed in the previous RFI. If better technological equipment is developed, Giant may request that an alternative method be used. Results shall be included in the appropriate Annual Monitoring Report.

SWMU 9, The Sludge Pits

Giant shall complete soil borings as close as possible to sampling points 6 and 7 (numbers correspond to previous RFI sampling points, completed in May, 1991). Sampling intervals shall be at 18.0 - 19.0 foot and 24.0 - 25.0 foot. Sampling procedures and analytical constituents shall be identical to those required in the previous

SWMU 9, The Sludge Pits

The EPA is unable to approve Giant's finding of no further action for this SWMU. Two (2) soil samples collected at the 15 foot interval (the deepest interval sampled) contained semivolatile contaminants. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications). Giant may begin the voluntary bioremediation (see SWMU #8 voluntary corrective action) under the CAP after the deeper soil samples have been completed.

MODIFICATIONS

SWMU 1, The Aeration Basin

Giant shall take soil samples around the Aeration Basin every two (2) years beginning in calendar year 1994. Sampling requirements shall be identical to those performed during the previous RFI, except that all soil borings shall be angled and an additional sample shall be collected at the 20-21 foot interval. Results shall be included in the appropriate Annual Monitoring Report (1994, 1996, etc.).

SWMU 6, The Tank Farm

Giant shall complete additional soil borings as close as possible to the following sample points (numbers correspond to previous RFI sampling points completed in May, 1991): 21, 22, 23, 25, 26, 27, 30, and 31. The sampling interval shall be at 16 feet, with the exception of sample point 31 which shall be sampled at 20 feet. Samples shall be analyzed for BTEX constituents. Sampling must extend vertically until no subsequent increase in contamination levels is likely to occur. A minimum of two (2) "clean" samples are required to verify delineation. The results of this sampling event shall be submitted to EPA by October 1, 1994.

SWMU 2, Evaporation Ponds

Giant shall monitor the seven (7) groundwater wells around the evaporation ponds biannually for the same constituents monitored for in the original RFI. Results shall be included in the Annual Monitoring Report.

SWMU 13, Drainage Ditch between APIs Evaporation Ponds and Neutralization Tank Evaporation Ponds

Giant shall conduct soil sampling around the Drainage Ditch every two (2) years, with sampling beginning in calendar year 1994. Sampling procedures and analytical constituents shall be identical to those required in the RFI, except that all soil borings shall be angled and an additional interval shall be sampled at from 6.0-6.5 feet. Results shall be included in the appropriate Annual Monitoring Report (1994, 1996, etc.).

RFI. Sampling must extend vertically until no subsequent increase in contamination levels is likely to occur. A minimum of two (2) "clean" samples are required to verify delineation. The results of this sampling event shall be submitted to the EPA by October 1, 1994.

Before final closure of the West Pit under the CAP, all soil borings shall be sampled at the 18.0 - 19.0 and 24.0 - 25.0 foot intervals. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Four (4) soil borings shall also be completed (before closure) in the East Pit using the same requirements specified for the West Pit borings. Results shall be included in the appropriate Annual Monitoring Report.

Monitoring requirements under the voluntary CAP shall be submitted to EPA in the appropriate quarterly progress report. Giant shall notify the EPA when final closure of the Sludge Pits has been initiated.

Soil Boring Logs: The EPA has included an example of a soil boring log to be used for all future borings.