



Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

September 30, 1994

Nancy Morlock
Hazardous Waste Management Division
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Quarterly Progress Report

Dear Ms. Morlock:

Pursuant to the requirements of the HSWA Permit, Condition C.4., Page 11 and the May 31, 1990 RFI Work Plan Approval, Giant Refining Company - Ciniza (Giant) submits the Quarterly Progress Report for the third quarter of 1994.

Giant has completed the additional sampling requirements as directed by the January 7, 1994 letter from the Hazardous Waste Management Division of Region VI, USEPA, with the notable exception of three sample points. At Tank 451, the drilling rig was too large to maneuver into the limited space around the tank, particularly in a safe manner. A portable pneumatic rig will be employed on October 24 or 25 to complete that boring. The photoionization detector (PID) that was used for this RFI event malfunctioned and we were unable to take readings around the leaded gasoline tanks. Consequently, Giant did not drill deep enough to get two "clean" samples. Giant has contracted Precision Engineering, Inc. to drill two additional borings to depths as needed to produce clean samples. This will occur on October 24 or 25.

Results of the sampling and analysis of those three sites will be submitted to USEPA on or before December 1, 1994.

Giant proceeded with all additional sampling and analysis needed to fulfill the requirements of closure of SWMU No. 10 - The Sludge Pits as set forth in the January 7, 1994 letter from your office.

Giant has, essentially, completed the "Report on Additional FRI Sampling" and will submit it on October 1, 1994.

During the fourth quarter of 1994, Giant will continue dirt work and sampling on SWMU No. 8 as closure of that SWMU continues. Giant will also be developing correction action plans for SWMUs as indicated in the "Report on Additional RFI Sampling".

Surveys of several SWMUs were made by registered surveyors in the third quarter of 1994. Copies of those survey plats will be submitted in the fourth quarter of 1994.

If you require additional information, please contact Lynn Shelton, of my staff, at (505) 722-0227.

"I certify under penalty of law that this document and all attachments were prepared under my direction to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,



John Stokes
Refinery Manager
Giant Refining Company

JJS/TLS:sp

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

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