

BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 17, 1994

Mr. Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

**Re: Sampling Locations for the Land Treatment Unit Characterization
Plan, Ciniza Refinery, Gallup**

Dear Mr. Shelton:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department has reviewed the Random Number Sampling Locations for the Land Treatment Unit Characterization Plan for Giant Refining Company's (GRC) Ciniza Refinery near Gallup. HRMB's preference from the three choices for random sampling locations GRC provided in the October 7 fax is scenario #1 with the following modifications (see the attached grid) - in cell #1 delete sample location 189 and add sample locations 43 and 173 and in cell #3 add sample location 178.

HRMB understands all sample locations will be continuously sampled and logged to a depth of 25 feet below the original soil surface. GRC plans to collect samples from 1 foot (= base of the Zone of Incorporation), 3 feet (= approximate middle of the treatment zone), 5 feet (= base of the treatment zone) and 10 feet (= 5 feet below the treatment zone) and have them analyzed for the constituents listed in Appendix 1 (the Sampling Plan) of GRC's June 1994 "LAND TREATMENT UNIT CHARACTERIZATION" submittal. Samples from 15, 20, and 25 feet will be sent to the laboratory, but analyzed only if needed for vertical contaminant determination.

HRMB is concerned with the loss of any volatile constituents, through biodegradation or volatilization, from the 15, 20, and 25-foot samples during the time needed to analyze the shallower samples and suggests volatile extraction be done on all samples at the same time. The extraction for the three deepest samples can

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be held, along with the soil samples, for analysis if needed. In addition, HRMB is requiring collection and analysis of samples from sediments between the planned 5-foot intervals below the treatment zone if field observation indicates contamination.

Please call Bob Sweeney of my staff at 827-4308 if you have questions on the above and to confirm the drilling and sampling schedule, now planned to begin on October 24, so he may be present to observe operations.

Sincerely,



Ronald A. Kern
RCRA Technical Compliance Program Manager
Hazardous and Radioactive Materials Bureau

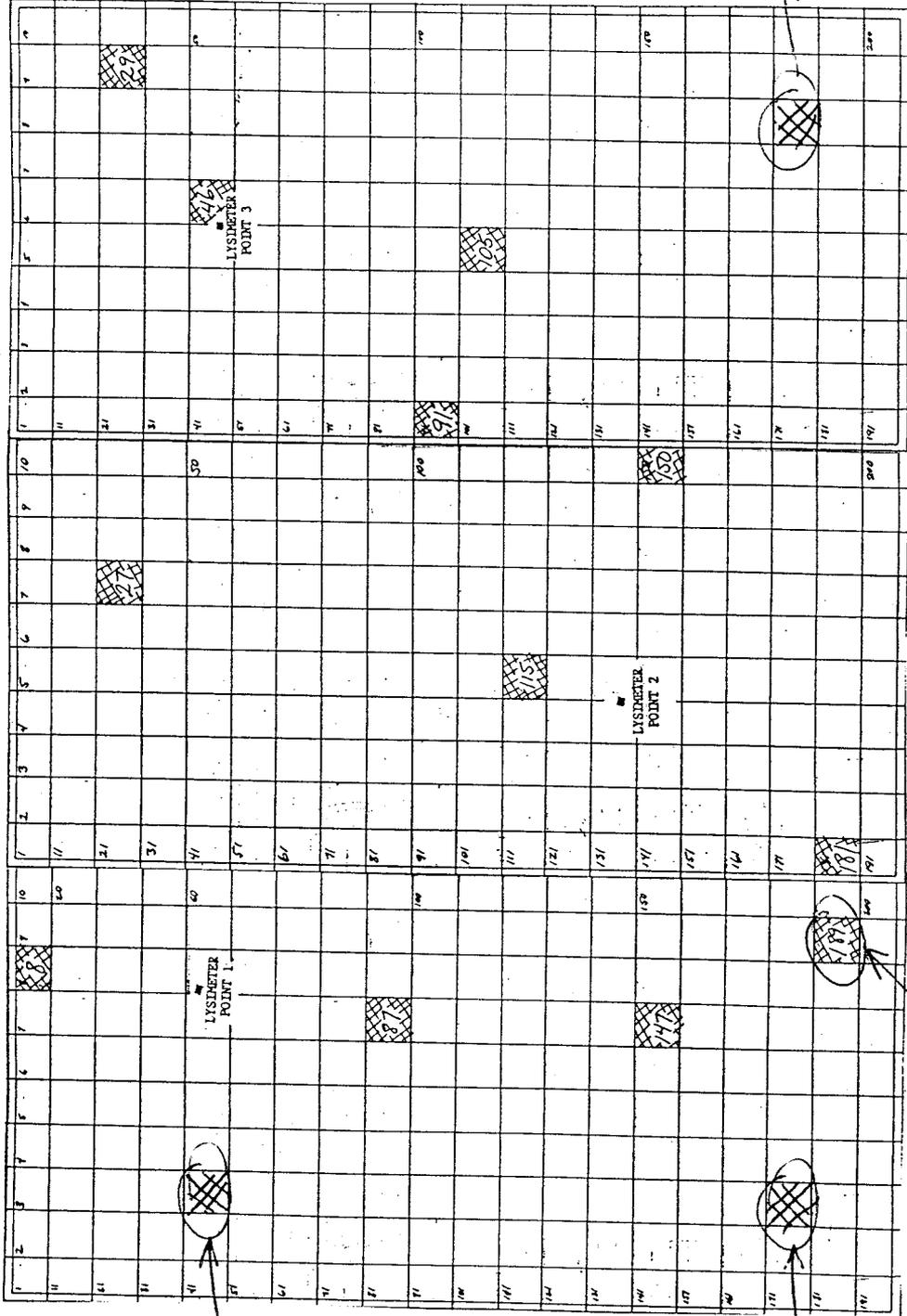
encl: sampling grid

cc: Barbara Hoditschek, RCRA Permitting Program Manager
GRC 1994 Red File
RCRA TCP GRC File

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GIANT REFINING COMPANY-CINIZA
 LAND TREATMENT UNIT
 SAMPLING GRID
 RANDOM NUMBER SYSTEM
 SCENARIO 1 (modified)

SCALE
 1 GRID = 24' x 24'



Cell #1 Cell #2 Cell #3

delete

