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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 25, 1995

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

Re: Giant Refining Company's (GRC) proposed replacement of monitoring well SMW-6, Ciniza Refinery, Gallup, New Mexico.

Dear Mr. Shelton:

The Hazardous and Radioactive Materials Bureau (HRMB) has reviewed GRC's letter of July 6, 1995 in which you proposed replacing groundwater monitoring well SWM-6. The following questions and comments need to be addressed before HRMB can consider granting approval for the proposal.

- 1) In the 4th paragraph of your letter you state GRC's belief that the stainless steel casing in SMW-6 is damaged and that water samples from this well are similar to the water in the evaporation lagoons. Has damaged casing provided a pathway for lagoon water to reach the Ciniza Sands? Can GRC provide an analysis of the evaporation lagoon water so that HRMB can compare it to the groundwater analyses?
- 2) In the 5th paragraph of your letter you suggest earth moving activities in the evaporation lagoons adjacent to SMW-6 may have exposed a route for lagoon water to migrate to the Ciniza Sands. Could you explain in greater detail what you have in mind?
- 3) In the 6th paragraph you propose drilling an offset monitoring well prior to plugging and abandoning SMW-6. Unless SMW-6 is providing a conduit for contaminants to reach groundwater, HRMB sees no reason to plug it. The new monitoring well, if approved, will need to be designed and constructed similar to the existing SMW-6 (with the obvious difference in casing materials). The U.S. Environmental Protection Agency's RCRA GROUND-WATER MONITORING: DRAFT

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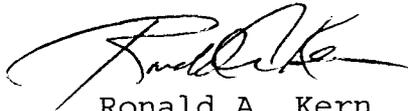
GRC

TECHNICAL GUIDANCE, November 1992 contains the guidelines for design, construction and development of a monitoring well.

- 4) In the 8th paragraph you state GRC does not consider the abandonment of SMW-6 and its replacement with SMW-6A to be permit modifications. Because the proposed well, SMW-6A, will replace a monitoring well which may be damaged and/or will have a different design than the existing well, SMW-6, a permit modification may be required. Please submit a more detailed diagram (e.g. where the centralizers will be placed, slot size, thickness and location of bentonite plug above the slotted screen, height of top of casing above ground level, radius of concrete pad, etc.) than the well diagram sent with your July 6 letter.

Please call Bob Sweeney of my staff at 827-4308 if you have questions on the above.

Sincerely,



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

cc:Barbara Hoditschek, RCRA Permitting Program Manager
GRC 1995 Red File
RCRA TCP GRC File