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SURFACE WATER
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July 26, 1995

James Harris
Hazardous Waste Management Division
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Report on the March 1995 RFI sampling activities
Giant Refinery - Ciniza NMD000333211

Dear Mr. Harris:

Giant Refining Company - Ciniza (Giant) submits the Report on the
March 1995 RFI Sampling Activities.

If you have any questions about this report or require additional
information, please do not hesitate to call me at (505) 722-0227.

Sincerely:

Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

cc: Kim Bullerdick, Corporate Counsel, Giant Industries Arizona,
Inc.
Kathleen Sisneros, NMED
Roger Anderson, NMOCD
Gallup Public Library

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REPORT
ON THE
MARCH, 1995
SAMPLING ACTIVITIES

SOWD #6 - Leaded Gasoline Tanks

**REPORT
ON THE
MARCH, 1995
SAMPLING ACTIVITIES**

**GIANT REFINING COMPANY
CINIZA REFINERY**

JULY 24, 1995

**PREPARED BY:
LYNN SHELTON
SENIOR ENVIRONMENTAL COORDINATOR
GIANT REFINING COMPANY**

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[TA\WP\LS\REPCONT]

INTRODUCTION:

In order to complete the characterization of Solid Waste Management Unit (SWMU), #6 the **Leaded Gasoline Tanks**, Giant Refining Company - Ciniza (Giant) performed additional drilling and sampling activities during the weeks of October 24, 1994 and March 21, 1995.

The drilling and sampling activities performed in October were to characterize the extent of contamination at the following sample points in SWMU #6:

RFI0639V	Tank	569
RFI0640V	Tank	570

The sampling protocol called for drilling until two clean samples from each borehole were obtained. This task was successfully completed at sample point RFI0640V (Tank 570) using a combination of careful drilling practices, geological observations and the use of a Photo Ionization Detector (PID).

In drilling sample point RFI0639V (Tank 569), the same drilling techniques, including observations with a PID, were utilized and the coring proceeded in a straightforward fashion. As shown in the lithologic logs, everything appeared to be normal. Although a saturated zone was encountered, that zone was not considered suspicious. Interestingly enough, the zones between 40.0 and 50.0 feet showed very low PID readings. Laboratory analyses later samples at 40.0, 45.0, and 50.0 feet were clean, the PID showed elevated by hydrocarbon levels at 55.0 feet (later confirmed by laboratory analysis). See the original analytical data.

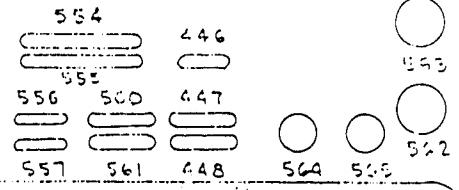
In retrospect, this rudimentary observation the field PID reading at 55.0 feet, which was considered questionable at the time, was significant. The presence of BTEX contamination at 55.0 feet indicated that Giant would have to drill deeper to obtain clean samples. This situation was reported to Region VI, USEPA in the December 16, 1994 **Quarterly Progress Report** While planning the drilling and sampling activities required by Region VI, USEPA (in it's December 22, 1994 letter), the reason for the presence of BTEX at 55.0 feet was realized.

It is now apparent that enough water/hydrocarbon had migrated down the open borehole during drilling operations (which included a break before drilling the 50.0-55.0 foot interval) to cause a "hit". In order to preclude a recurrence of this mistake, Giant and Precision Engineering, Inc. (The drilling/engineering firm used in this project) developed a plan to isolate the water bearing zone in the March drilling. This plan was submitted to Region VI, USEPA in the March 10, 1995 Sampling And Analysis Plan, RCRA Facility Investigation, SWMU #6 and to NMOCD in the February 24, 1995 Tank 569 Characterization Plan.

The final drilling was performed March 21-23, 1995 and incorporated the protocol outlined in the documents described above as well as the requirements in the aforementioned December 22, 1994 letter. The analytical results from this sampling event indicated that two, consecutive clean samples from each leaded gasoline tank were indeed obtained.

[TA\WP\LS\REPORT]

BORING PLAN
MARCH '95 DRAINING PLAN



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