

Giant Red 1995



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MEMORANDUM

TO: Michael Chacón, RCRA Permitting Program
THROUGH: Ron Kern, RCRA Technical Compliance Program Manager *RK*
FROM: Bob Sweeney, RCRA Technical Compliance Program *[Signature]*
DATE: August 31, 1995
SUBJECT: **Closure/Contingency Post-Closure Plan for the Land Treatment Unit at Giant Refining Company's Ciniza Refinery**

The RCRA Technical Compliance Program (TCP) was requested by the RCRA Permitting Program to review the October 1994 document "**Closure/Contingency Post-Closure Plan**" for the Ciniza refining facility of Giant Refining Company (GRC), Gallup, New Mexico. The document was submitted to comply with the Hazardous Waste Facility Permit (permit number NMD 000333211-2) issued for the Land Treatment Unit by the New Mexico Environment Department on November 4, 1988. TCP technical comments and recommendations are included on the attached pages (Attachment I).

cc (with attachment):
Barbara Hoditschek, RCRA Permitting Program Manager
→ GRC 1995 Red File
RCRA TCP GRC File

5. Section 1.2.2.1, 3rd paragraph. ("**...if a sample...has no detectable constituents, then soil pore monitoring will be discontinued.**") Reword the sentence to indicate that monitoring will be discontinued only after the 90 day sampling is attempted.
6. Section 1.2.2.2, 4th paragraph. ("**...soil core samples...will be...analyzed for the constituents in Table 1.**") The comments for Item 4 above apply here also.
7. Section 1.2.2.2, 4th paragraph. ("**Sampling locations will be established by using a random numbers table.**") In the past, GRC has submitted multiple random number scenarios and HRMB has then modified one of the scenarios to arrive at an acceptable sampling location plan. The resulting locations are no longer "random". The location selection process can be simplified by GRC and HRMB agreeing to locations chosen through best judgement.
8. Section 1.2.2.2, 7th paragraph. ("**If in-situ treatment has degraded hazardous constituents to corrective action levels or below, the treatment will be considered complete.**") The regulatory approved corrective action levels should be stated in the Plan.
9. Section 1.2.2.3, 2nd paragraph. ("**Cell #3 was graded to a 1-2° dip to the west, but will likely be leveled...**") The surface of the cell needs to be leveled to assure even distribution of precipitation and irrigation water and to avoid pooling of liquids.
10. Section 1.2.2.3, 6th paragraph. ("**There may be a lag time between evaluation and actual seeding...**") What is the estimated length of the lag time and how will GRC maintain the surface of the LTU during the lag period?
11. Section 1.2.2.5, 2nd paragraph. ("**All analyses will be for Table 5 constituents.**") Table 5 includes Table 1. The deficiencies of Table 1, noted in Item 4 above, should be corrected.
12. Section 1.2.2.5, 3rd paragraph. ("**If no hazardous constituents are detected in the shallow monitor wells... groundwater monitoring will be discontinued.**") Hazardous constituents in groundwater samples from the shallow monitor wells (i.e. samples from the Ciniza sand) were reported in the 1994 Annual Groundwater Report. The report indicates