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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 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 July 28, 1995 response to HRMB's July 25, 1995 letter regarding abandonment of monitoring well SMW-6 and installation of SMW-6A. NMED approves the replacement of monitoring well SMW-6 with SMW-6A under the following conditions:

- 1) SMW-6A will be located, as stated in GRC's July 6, 1995 letter, approximately 20 feet northwest of SMW-6, and
- 2) NMED and EPA guidelines for well installation and abandonment will be followed. Earlier GRC correspondence regarding the well replacement lacks sufficient detail in places. NMED and EPA guidelines, intended to fill in the gaps, are given in the following paragraphs.

To preclude contamination of groundwater, and to confine groundwater to the aquifer in which it occurs, the existing monitoring well, SMW-6, must be plugged correctly. This may be accomplished by pulling, or overdrilling and extracting, the casing and then pumping, via a tremie pipe, expanding cement with bentonite from the bottom to the top of the well. If the casing cannot be removed it shall be ripped or perforated along its entire length and grouted under pressure.

Mr.. Lynn Shelton  
September 25, 1995  
page 2

Installation of the new monitoring well, SMW-6A, will include the following (in addition to the details in GRC's letters of July 6 & 28, 1995):

- a) the boring shall be sampled continuously for stratigraphic control and a lithology/drillers log submitted to NMED,
- b) the casing will be schedule 40 PVC or heavier,
- c) the screen slot size and the filter pack (0.010" and 16-40 sand, respectively) specified in GRC's July 28, 1995 letter may be appropriate but should depend on the grain sizes found in the Ciniza Sand,
- d) the screen must extend across all of the Ciniza Sand,
- e) the filter pack should be tremied into the annular space and must extend to 2 feet above the screen,
- f) the protective steel casing shroud should have a drain hole and should be filled with cement to above the level of the concrete pad to prevent ponding.
- g) the cement pad must extend a minimum of 2 feet from the borehole in all directions,
- h) concrete or steel bumper guards, fitted with reflectors or painted to increase visibility, should be installed around the edge of the cement pad, and
- i) an "as built" well construction diagram must be submitted to NMED upon completion of the well.

Following completion and development of the new well, GRC intends to install in SMW-6A the pump now dedicated to SMW-6. Please submit GRC's Quality Assurance/Quality Control procedures for the pump decontamination.

GRC's July 28, 1995 letter stated that the "...design of the new well, SMW-6A, is an improvement on the well design and construction of SMW-6, primarily because it will have a sand pack around the screened interval as opposed to a gravel pack." NMED interprets this to mean SMW-6 was constructed with a gravel pack. Earlier information provided to NMED by GRC indicated the filter pack adjacent to the screened interval for all SMW series wells is washed sand, and not gravel. Please explain this discrepancy.

Although the new well will have a different casing material than the old, the RCRA Permits Program has determined that a modification to the Hazardous Waste Facility Permit Number NMD 000333211-2, issued by NMED to GRC for the land treatment unit at the Ciniza Refinery on November 4, 1988, will not be required.

Mr. Lynn Shelton  
September 25, 1995  
page 3

The replacement of SMW-6 with SMW-6A will be considered "a replacement in kind" since the function of the new well is the same as that of the old.

Additionally, HRMB is planning to conduct a one-day Comprehensive Ground-water Monitoring Evaluation (CME), including splitting samples with GRC, during the next groundwater sampling event. Could you arrange to do the next groundwater sampling event sometime during the period of Oct 10 to 13 or 23 to 27?

Please call Bob Sweeney of my staff at 827-1558 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