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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 6, 1995

Mr. David C. Pavlich
Health, Safety, and Environmental Manager
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

Re: Follow-up letter for the recent Comprehensive Groundwater Monitoring Evaluation, Land Treatment Area, Giant Refining Company's Ciniza Refinery

Dear Mr. Pavlich:

This letter is a follow-up to the October 26, 1995 Comprehensive Groundwater Monitoring Evaluation (CME) performed by Hazardous and Radioactive Materials Bureau (HRMB) personnel. The CME was conducted in conjunction with Giant Refining Company's (GRC) semi-annual sampling event of Resource Conservation and Recovery Act (RCRA) groundwater monitoring wells at the Land Treatment Area (LTA) at the Ciniza Refinery.

Shortly after arriving at the facility, HRMB conducted an Entry Conference with GRC personnel Lynn Shelton and Steve Morris. The purpose of the Entry Conference was to present HRMB's credentials, cite the statutory authority to enter the site, specify the reason for the evaluation, conduct an inspection of the groundwater monitoring system, obtain groundwater samples, and to discuss the objectives of and procedures for the CME.

The objectives of the CME included the following:

1) Ciniza Sand (geological information) - The question of which water-bearing zone (the deeper Sonsela Sand or the shallower Ciniza Sand) is to be determined as the uppermost aquifer beneath the LTA has been a concern to both HRMB and GRC. Subsurface data show there are several sand layers, some dry and others water-bearing, in the Ciniza Sand interval. Understanding the continuity and extent of the sand beds is critical in determining which water-bearing zone (i.e. the Sonsela or the Ciniza) is the

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uppermost aquifer. During the Entry Conference the complexity of the various sand beds in the Ciniza Sand interval, not only beneath the LTA but also in other parts of the refinery property, was discussed briefly. To answer questions about the areal extent of the Ciniza Sand(s), cross-sections or fence diagrams employing detailed stratigraphic information from the SMX, OW, MW, and SMW series boreholes/wells should be constructed. Please contact Mr. Bob Sweeney, the HRMB Facility Manager, to coordinate the specifics of this request.

2) Monitor Well - 5 (MW-5) - Certain information on MW-5 is missing from the HRMB files. Please send a lithology log and an "as built" construction diagram.

3) Replacement monitoring well for SMW-6 - HRMB understands that no water was found in the Ciniza Sand during three attempts to replace SMW-6. On a fourth attempt, SMW-6 was over-drilled, old stainless steel casing removed, new PVC casing installed, and very little water was observed in the newly completed well. HRMB requests GRC to continue monitoring this well to determine if the lack of water is seasonal or if the groundwater found in SMW-6 in the past was the result of infiltration of surface and near surface water down the annulus of the well bore. If Ciniza Sand groundwater enters this well in the future, the semi-annual sampling and analyses should be continued.

4) GRC's method of purging groundwater - GRC's practice of purging one or more monitoring wells prior to measuring the elevation of groundwater in all wells, and how the water levels might be changed in one well due to purging in another, was discussed. Please note that this was also commented on following the March 1991 CME. It is a requirement that GRC measure the groundwater elevation in all monitoring wells prior to purging any of them.

5) Method of displaying groundwater monitoring data - The possibility of portraying the semi-annual groundwater monitoring data in map form in addition to the tabular form now used was also discussed. The maps would show which contaminants have been detected in the monitoring wells and how the levels of contamination have changed over time. HRMB is still interested in this method of tracking contaminant plumes and would appreciate this additional information included in GRC's next semi-annual groundwater monitoring report.

The field portion of the CME consisted predominately of sampling groundwater monitoring wells SMW-4, MW-1, SMW-3, OW-24, and SMW-5. The samples will be analyzed for volatile and semi-volatile organics and metals. During the sampling, it was discovered that both GRC and HRMB were having the samples analyzed by Analytical

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Technologies, Inc. (ATI). HRMB contacted Dr. Mitch Rubenstein of ATI about this on October 27 and learned he was already aware of the situation and was arranging to have the GRC and HRMB samples analyzed at different ATI laboratories.

Following the field work an Exit Conference was held in which the initial findings of the CME were discussed with the facility representatives. No major technical deficiencies and no violations were found; however, the matter of pouring purge water onto the ground, as happened at OW-24 prior to HRMB oversight, was discussed. Purge water from all LTA wells should be stored in drums until analytical results determine if the groundwater contains hazardous constituents. If the water is found not to be contaminated, it may be disposed of by pouring onto the ground near the well. If analyses show the water to be contaminated, it must be handled as a hazardous waste and not poured onto the ground nor placed in the LTA.

HRMB appreciates GRC's cooperation and assistance in conducting a successful CME. A copy of the laboratory analytical results will be provided to GRC once available. Please contact Bob Sweeney at (505) 827-1558 if you have any questions or comments.

Sincerely,



Ronald A. Kern
RCRA Technical Compliance Program Manager

cc: Barbara Hoditschek, RCRA Permitting Program Manager
James Harris, EPA Region 6
GRC 1995 Red File
RCRA TCP GRC File