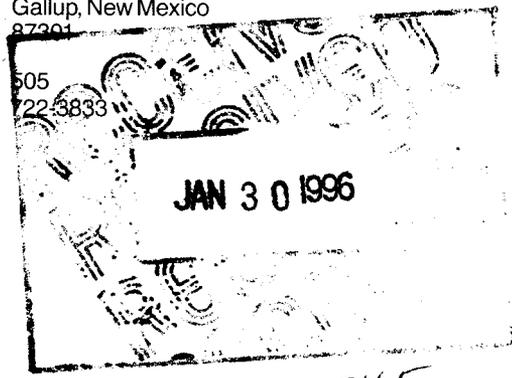




*Bob S.*

January 26, 1996

Route 3, Box 7  
Gallup, New Mexico  
87301



Mr. Benito J. Garcia  
Bureau Chief  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044 Galisteo Street  
Santa Fe, New Mexico 81502

Dear Mr. Garcia:

**SUBJECT: 1995 SEMI-ANNUAL GROUND WATER  
ANALYTICAL RESULTS NOTIFICATION**

*FILE*

From October 26, 1995, through October 28, 1995, Giant Refining Company conducted a semi-annual groundwater sampling event at the Ciniza Refinery. This event is required pursuant to Giant's "Hazardous Waste Facility Permit," #NMD 000333211-2, issued on November 4, 1988, by the New Mexico Environment Department (formerly known as the New Mexico Health and Environment Department, Environmental Improvement Division). Ground water samples were taken from the following wells:

- SMW - 3    MW - 2
- SMW - 4    MW - 4
- SMW - 5    MW - 5
- MW - 1    OW - 11

Collected samples were sent to Analytical Technologies, Inc. (ATI) and analyzed in accordance with approved EPA methods and permit requirements.

After reviewing the analytical results, Mr. Lynn Shelton, Giant Refining, contacted Mr. Bob Sweeney, of your staff, via telephone and informed him that some of the analytical results indicated that hazardous constituents may have been detected in some of the samples (see Table 1). Questions as to the validity of these results have been raised since the constituents that were detected are common laboratory contaminants, e.g. acetone, methylene chloride, and trichlorofluoromethane; and Giant has not used, or has used only very small quantities of, these materials in the past.

This letter is to serve as written notice of the laboratory's findings and to advise you of Giant's proposed course of action in regard to these analytical results.

Giant has been in discussions with ATI regarding our concerns about the apparent laboratory contamination appearing in sample analyses. These concerns will need to be adequately addressed to Giant's

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satisfaction prior to the next scheduled sampling event. This will be a prerequisite to the selection of ATI or another laboratory for the required sample analyses.

Because of the strong indications of lab contamination as the source of the anomalous presence of the contaminants shown in the sample analyses, Giant proposes to defer the determination of the presence or absence of the contaminants in question until the results of the next scheduled sampling event in the Spring are obtained.

Should you or your staff have any questions regarding the above, please do not hesitate to contact me at (505)722-3833. Thank you for your time and consideration in this matter.

Sincerely,



Ed Horst  
Environmental Manager

- cc: Barbara Hoditschek, Program Manager, NMED/HRMB
- Kim Bullerdick, Giant Industries, Corporate Counsel
- Dick Platt, Giant Refining, General Manager
- David C. Pavlich, Giant Refining, Safety/Health/Enviro Manager

**TABLE 1**

**SEMI ANNUAL GROUND WATER  
ANALYTICAL RESULTS**

WELL NUMBER	SAMPLE NUMBER	PARAMETER	RESULTS	REPORTING LIMITS	COMMENTS
SMW - 4	540424-02	Acetone	54 ppb	10 ppb	Questionable: common lab contaminate and very small quantities used at the facility
		Methylene Chloride	3 ppb	3 ppb	Questionable: common lab contaminate, detected at reporting limits and not used at this facility.
		Trichlorofluoro methane	2 ppb	1 ppb	Questionable: near detection limits, not used in the facility.
MW - 1	510424-04	Acetone	650 ppb	100 ppb	Questionable: same as SMW - 4
MW - 2	510428-01	Methylene Chloride	7 ppb	3 ppb	Questionable: this is a common lab contaminant near detection limits and not used at this facility .
MW - 4	510428-02	Acetone	14 ppb	10 ppb	Questionable: common lab contaminant and near detection limits.
		Methylene Chloride	5 ppb	3 ppb	Questionable: common lab contaminant and near detection limits and not used at

					this facility.
MW - 5	510428-03	Acetone	570 ppb	100 ppb	Questionable: very small amount used in the facility and this is a common lab contaminant
		Methylene Chloride	5 ppb	3ppb	Questionable: common lab contaminant and near detection limits and not used at this facility.
OW - 11	510428-04	Acetone	13 ppb	10 ppb	Questionable: this is the upgradient, background well. Common lab contami- niant and near detection limit.
		Methylene Chloride	5 ppb	3 ppb	Same as stet. This material is not used at this facility.