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Gallup, New Mexico  
87301

February 9, 1999

Dr. Stuart Dinwiddie, Manager, RCRA Permit Management  
New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
2044 Galisteo  
P. O. Box 26110  
Santa Fe, New Mexico 87502

**RE: HRMB Annual Unit Audit**

Dear Dr. Dinwiddie:

Per the request by the Hazardous and Radioactive Materials Bureau, Giant's Ciniza Refinery is submitting this letter identifying the facility's number and types of RCRA units. Currently, Ciniza is operating under the 1988 Hazardous Waste Facility Permit No. NMD 000333211-2. On April 24, 1998, Ciniza submitted a RCRA Part A and Part B Post-Closure Permit Application.

Ciniza's RCRA units consist of one (1) Land Treatment Unit (LTU) and fourteen (14) Solid Waste Management Units (SWMUs) as identified in the 1988 permit and in the 1998 Post Closure Permit Application. Attachment A to this letter lists the SWMU Identification designations used in the current HSWA permit, the Post-Closure Permit application and other official documents. The enclosed Attachment B summarizes the status of each SWMU as of the April 24, 1998 Post Closure Permit submittal. EPA has given NFA approval to SWMU 3 and NFA approval with continued sampling to SWMUs 1, 2, and 13. A Closure Plan and Certification was submitted to NMED HRMB for SWMU 5 in 1998. Detailed reports of the SWMUs status are contained in Volume III, Appendix I of the new permit application. Ciniza has no other units or areas of concern to report.

Per Table 2.1 in 20 NMAC 4.2, Section 203, the Annual Hazardous Waste Management Business Fee is \$1500 for a Treatment Unit and \$250 for each Corrective Action Unit. Ciniza's Business Fee for 1999 would be \$5000.

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Please contact me at (505) 722-0227 if you have any questions or concerns regarding this information. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Dorinda Mancini". The signature is fluid and cursive, with a large initial "D" and "M".

Dorinda Mancini  
Ciniza Refinery Environmental Manager

Enclosures

cc: Dave Pavlich, Environmental Superintendent, Giant Refining Co.

**Table J-2. Ciniza Refinery—Solid Waste Management Unit Identification**

Description	HSWA <sup>1</sup> Permit 1988	RFI <sup>2</sup> Work Plan 1990	EPA <sup>3</sup> Letters 1994	LTU <sup>4</sup> Post- Closure Part B 1998
Aeration Basin	i	1	1	1
Evaporation Ponds	ii	2	2	2
Empty Container Storage Area	v	3	5	3
Old Burn Pit	viii	4	8	4
Landfill Areas	vii	5	7	5
Tank Farm	iii	6	6	6
Fire Training Area	iv	7	4	7
Railroad Rack Lagoon, Overflow Ditch and Fan Out Area	vi	8	8	8
Inactive Land Treatment Area	x and xiii	9	—	9 and 14
Sludge Pits	ix	10	9	10
Secondary Oil Skimmer and Associated Drainage Ditch	xi	11	11	11
Contact Waste Water Collection System	xii	12	13	12
Drainage Ditch Between APIs Evaporation Ponds and Neutralization Tank Evaporation Ponds	xiv	13	13	13
Drainage Ditch near the Inactive Land Treatment Area		14		

<sup>1</sup>Solid Waste Management Unit Numbers as designated in the HSWA Permit (Section C, Corrective Actions for Continuing Releases, 5(a)(1), December 1988).

<sup>2</sup>Solid Waste Management Unit Numbers as designated in the RCRA Facility Investigation Work Plan (submitted May 1990).

<sup>3</sup>Solid Waste Management Unit Numbers as designated in the EPA letters (provided as Attachment J-1).

<sup>4</sup>Solid Waste Management Unit Numbers as designated in the RCRA Part B Post-Closure Application (Volume III, Appendix J-1 through J-13).

Table J-1. Solid Waste Management Units

SWMU No. <sup>1</sup>	SWMU Title	Status	Report
1	The Aeration Basin (i) <sup>2</sup>	EPA approval of NFA given in January 1994. Survey plat <sup>3</sup> submitted to EPA. Investigative process complete. Five-year sampling of soil around basin required again in 2001.	Appendix I-1: Aeration Basin - SWMU No. 1 Summary
2	The Evaporation Ponds (ii)	EPA approval of NFA given in January 1994. Investigative process complete. Follow-up monitoring required. Survey plat <sup>3</sup> submitted. Five-year sampling required again in 2001.	Appendix I-2: Evaporation Ponds - SWMU No. 2 Summary
3	Empty Container Storage Area (v)	EPA approval of NFA given January 1994. Investigative process complete. Survey plat <sup>3</sup> submitted to EPA.	Appendix I-3: Empty Container Storage Area - SWMU No. 3 Summary
4	Old Burn Pit (viii)	RFI 1990; sampling report identified corrective action. Site capped in 1998. Investigative process complete. Survey plat <sup>3</sup> submitted.	Appendix I-4: Old Burn Pit - SWMU No. 4 Summary
5	Landfill Areas (vii)	VCAP submitted February 1993 and approved in January 1994. Closure plan prepared and certified by PE, 1998.	Appendix I-5: Landfill Areas - SWMU No. 5 Closure Certification
6	The Tank Farm—Leaded Gasoline Tanks (iii)	VCAP submitted in April 1996. Investigative process complete. Corrective action currently under way. Survey plat <sup>3</sup> submitted.	Appendix I-6: Tank Farm—Leaded Gasoline Tanks - SWMU No. 6 Summary
7	Fire Training Area (iv)	VCAP submitted in March 1993, and approved via fax in March 1996. RFI sampling complete. Investigative process complete. Survey plat <sup>3</sup> submitted. Corrective action ongoing.	Appendix I-7: Fire Training Area - SWMU No. 7 Summary
8	The Railroad Rack Lagoon (vi)	VCAP submitted in December 1992, and approved in November 1994. RFI sampling complete. Investigative process complete. Corrective action ongoing. Survey plat <sup>3</sup> submitted.	Appendix I-8: Railroad Rack Lagoon - SWMU No. 8 Summary
9	The Drainage Ditch Near the Inactive Land Farm (x and xiii)	RFI sampling complete. Report on additional RFI sampling suggested NFA. Investigative process complete. Survey plat <sup>3</sup> submitted to EPA.	Appendix I-9: Drainage Ditch and the Inactive Land Farm - SWMU No. 9 Summary
10	The Sludge Pits (ix)	VCAP submitted in December 1992, and approved in January 1994. RFI sampling complete. Investigative process complete. Proceed with closure activities. Survey plat <sup>3</sup> submitted.	Appendix I-10: Sludge Pits - SWMU No. 10 Summary

Table J-1. Solid Waste Management Units (Continued)

SWMU No. <sup>1</sup>	SWMU Title	Status	Report
11	Secondary Oil Skimmer (xi)	RFI sampling complete. Report on additional RFI sampling suggested NFA. Investigative process complete. Corrective action ongoing. Survey plat <sup>3</sup> submitted.	Appendix I-11: Secondary Oil Skimmer - SWMU No. 11 Summary
12	Contact Wastewater Collection System (CWWCS) (xii)	Investigative process complete. EPA requires inspection every 5 years. Ciniza currently repairing and inspecting system. Will notify NMOCD upon completion.	Appendix I-12: Contact Wastewater Collection System - SWMU No. 12 Summary
13	The Drainage Ditch Between API Evaporation Ponds and Neutralization Tank Evaporation Ponds (xiv)	EPA approval of NFA given in January 1994. Follow-up monitoring required. Survey plat <sup>3</sup> submitted to EPA. Soil sampling collected around drainage ditch required again in 2001.	Appendix I-13: Drainage Ditch Between API Evaporation Ponds and Neutralization Tank Evaporation Ponds - SWMU No. 13 Summary

<sup>1</sup>Solid Waste Management Unit Numbers as designated in the RCRA Facility Investigation Work Plan (submitted May 1990).

<sup>2</sup>Solid Waste Management Unit Numbers as designated in the HSWA Permit (Section C, Corrective Actions for Continuing Releases, 5.(a)(1). December 1988.

<sup>3</sup>See Figure J-14.