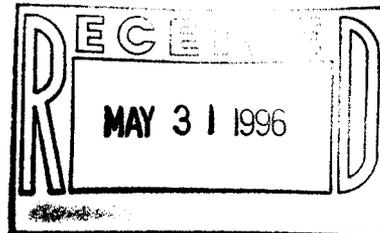




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

MAY 29 1996



Barbara Hoditschek, Manager, RCRA Permits Program  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, NM 87502

RE: Comments on the Corrective Action Plan for SWMU # 6, Product Recovery, Giant Refinery (Ciniza), EPA ID. No. NMD000333211.

Dear Ms. Hoditschek:

On April 19, 1996 the Environmental Protection Agency (EPA) received a copy of the Corrective Action Plan (CAP) for SWMU # 6, Product Recovery, Giant Refinery (Ciniza). EPA has reviewed the CAP and recommends further horizontal and vertical delineation of the plume. In a letter dated January 7, 1994 EPA requested "...Sampling must extend vertically until no subsequent increase in contamination levels is likely to occur. A minimum of two (2) clean samples are required to verify delineation." EPA also indicated in a letter dated December 15, 1994 "...EPA's interpretation of the soil boring results indicate that there is BTEX contamination in the most vertical interval taken at each tank boring. Therefore, the full extent of contamination has not been determined at each tank."

Stabilization measures should be implemented to isolate and remove the free product in the subsurface. EPA recommends the extent of the release should be determined so as to track the changes in the movement of the plume once the hydrostatic pressure is altered by the pump and treat system.

If you have any questions regarding EPA's comments on the CAP at SWMU # 6 please contact James Harris of my staff at (214) 665-8302.

Sincerely,

  
David Neleigh, Chief  
New Mexico and Federal  
Facilities Section

cc: Benito Garcia  
Bob Sweeney  
Patricio W. Sanchez