



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
*Hazardous & Radioactive Materials Bureau*  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

May 29, 1996

Mr. Patricio W. Sanchez  
Petroleum Engineer  
Oil Conservation Division  
New Mexico Energy, Minerals and  
Natural Resources Department  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

**RE: Comments on the Corrective Action Plan for SWMU #6, Product Recovery, Giant Refining Company (Ciniza).**

Dear Mr. Sanchez:

The attached memorandum includes the Hazardous and Radioactive Materials Bureau's (HRMB) comments regarding Giant Refining Company's April 15, 1996 *Corrective Action Plan (CAP)* for recovering free product located below Solid Waste Management Unit 6, the Tank Farm. The HRMB comments include the comments and concerns of EPA and, as agreed on during our meetings of May 8 and 17, are to be included in your response to Giant regarding the CAP. Please send a copy of all correspondence related to this CAP to my attention at HRMB.

If you have questions on the attached comments you may contact Mr. Bob Sweeney of my staff at 827-1558.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ronald A. Kern".

Ronald A. Kern  
RCRA Technical Compliance Program Manager

cc: Barbara Hoditschek, RCRA Permitting Program Manager  
James Harris, EPA Region 6  
GRC 1996 Red File  
RCRA TCP GRC File

NEW MEXICO ENVIRONMENT DEPARTMENT  
Hazardous and Radioactive Materials Bureau

**MEMORANDUM**

---

Date: May 29, 1996  
To: Ron Kern, Technical Compliance Program Manager  
From: Bob Sweeney  
Re: Giant Refining Company - Ciniza (GRC-C) "CORRECTIVE ACTION PLAN SWMU-6 PRODUCT RECOVERY" dated 15APR96.

---

The following deficiency comments are submitted for your approval. The comments express the concerns James Harris (EPA R6) and I have regarding Giant Refinery's April 15, 1996 *Corrective Action Plan* (CAP) for recovering free product located below Solid Waste Management Unit 6 (SWMU-6), the Tank Farm. When the comments are approved they will be forwarded to the Oil Conservation Division (OCD) for inclusion in a letter OCD is preparing in response to the CAP.

**General Comment 1:** SWMU-6 is included in the Hazardous and Solid Waste Amendments module of Giant Refining Company's Resource Conservation and Recovery Act Permit and, as such, requires certain corrective actions to be taken when hazardous constituents have been released to the environment. The following issues need to be addressed:

- The source of the contamination must be determined and further release prevented. Are the storage tanks in SWMU-6 now active? Have they been checked for releases? Has all piping in the area been tested for leaks? What other potential contamination sources exist at the site?
- Contaminant characterization must be completed. What contaminant types and concentrations are in the groundwater and soils at SWMU-6? At what rate is the contamination spreading away from the SWMU-6? What is the extent (both vertical and horizontal) of contamination?

Memo to Ron Kern  
GRC-C, SWMU-6  
29May96

- What are the hazardous constituents of concern for the site? How and where will environmental media be sampled for hazardous waste contamination? What analyses will be done for hazardous constituents in both soils and groundwater?

**General Comment 2:** The proposed pump & treat method of product removal is likely to alter the characteristics of the contaminant plume. How does GRC-C propose to monitor the changes?

**General Comment 3:** A timetable for completion of the several tasks associated with corrective action for SWMU-6 must be submitted.

**General Comment 4:** NMED needs construction & lithology logs and ground levels for the OW wells in order to determine if they're usable, as proposed, in the proposed corrective action.

**Specific Comments:**

**Page 10, Paragraph 2:** The boreholes will be sampled and analyzed for hazardous constituents every two feet until two "clean" samples are found.

**Page 11, Paragraph 2:** How will the API Separator effluent water be checked for dissolved constituents? How will any contaminated water be handled?

**Page 11, Paragraph 3:** Does GRC-C assume all free product will be removed by pumping from wells B-2 and BG-4? How will contaminated soil and groundwater be remediated?

**Page 12, Paragraph 1:** Are the wells OW-14 and OW-13 downgradient of SWMU-6? Across which sands are the two wells screened?