



August 10, 2001

Mr. David Cobrain
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Road, Building E
Santa Fe, New Mexico 87505



Dear Mr. Cobrain:

Giant Refining Company-Ciniza Refinery (Ciniza) submits, for your consideration, a petition for *No Further Action* for 11 of its 14 solid waste management units (SWMUs). The report, *No Further Action Report SWMUs 1,2,3,4,5-Volume I* and *No Further Action Report SWMUs 7,9,10,11,12,13-Volume II*, containing the petition for No Further Action for the SWMUs accompanies this letter. The *No Further Action* report has been organized to comply with the format and guidelines specified in the New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) *RCRA Permits Management Program Standard Operating Procedures Manual and Document Requirement Guide*.

Ciniza requests a review of the *No Further Action* report by HWB for the following SWMUs, identified during a Resource Conservation and Recovery Act (RCRA) facility assessment performed in August 1987.

- SWMU No. 1, *Aeration Basin*
- SWMU No. 2, *Evaporation Ponds*
- SWMU No. 3, *Empty Container Storage Area*
- SWMU No. 4, *Old Burn Pit*
- SWMU No. 5, *Landfill Areas*
- SWMU No. 7, *Fire Training Area*
- SWMU No. 9, *Drainage Ditch Near the Inactive Land Treatment Area*

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- SWMU No. 10, *Sludge Pits*
- SWMU No. 11, *Secondary Oil Skimmer*
- SWMU No. 12, *Contact Wastewater Collection System*
- SWMU No. 13, *Drainage Ditch Between API and Evaporation Ponds*

Assuming that HWB concurs with the finding of No Further Action, Ciniza requests written confirmation of the finding within 45 days following receipt of the petition. This review schedule and HWB response will allow Giant to re-allocate its' time and resources to remediation activities at the remaining SWMUs. If you have any questions or if the requested review schedule is too aggressive and cannot be met, please notify Dorinda Mancini, Environmental Manager, Ciniza Refinery, at (505) 722-0227.

Ciniza recognizes the assistance and level of cooperation the HWB has provided in the review and expeditious evaluation of previous regulatory submittals and wishes to express its appreciation for HWB's effort. This effort has paved the way for successful communication and cooperative problem solving. We look forward to continuing to work with HWB on the *No Further Action* project. Again, if you have questions, please contact me at the referenced phone number.

Sincerely,



Dorinda Mancini
Environmental Manager
Ciniza Refinery

cc: without enclosure:

Roger Anderson, New Mexico Oil Conservation Division
Denny Foust, New Mexico Oil Conservation Division
David Pavlich, Giant Industries, Inc, Ciniza Refinery
Wayne Price, New Mexico Oil Conservation Division

No Further Action Report SWMUs 1, 2, 3, 4, 5

August 2001

**Giant Refining Company
Ciniza Refinery**

Revision 0.0

Volume I

**Submitted to: New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2905 Rodeo Park Road, Building E
Santa Fe, New Mexico 87505**

**Prepared by: Ciniza Refinery
Route 3, Box 7
Gallup, New Mexico 87301**

EXECUTIVE SUMMARY

Giant Refining Company – Ciniza Refinery (Ciniza) is proposing no further action (NFA) for 11 of its 14 solid waste management units (SWMUs). These SWMUs were identified at the Ciniza Refinery during a Resource Conservation and Recovery Act (RCRA) facility assessment (RFA) performed in August 1987, managed as regulated units pursuant to the RCRA Post-Closure Care Permit for the Land Treatment Unit (August 2000), and described in detail in the Part B Post-Closure Permit Application (Revision 0, May 2000). This proposal for NFA is based on the five criteria for NFA proposals established by the New Mexico Environment Department (NMED) and addresses the applicable elements identified in NMED's guidance for NFA proposals.

This report provides documentation supporting the proposal for NFA for the following SWMUs identified at the Ciniza Refinery:

- SWMU No. 1, *Aeration Basin*
- SWMU No. 2, *Evaporation Ponds*
- SWMU No. 3, *Empty Container Storage Area*
- SWMU No. 4, *Old Burn Pit*
- SWMU No. 5, *Landfill Areas*
- SWMU No. 7, *Fire Training Area*
- SWMU No. 9, *Drainage Ditch Near the Inactive Land Treatment Area*
- SWMU No. 10, *Sludge Pits*
- SWMU No. 11, *Secondary Oil Skimmer*
- SWMU No. 12, *Contact Wastewater Collection System*
- SWMU No. 13, *Drainage Ditch Between API and Evaporation Ponds*

The information presented in this report is based on the RCRA facility investigation (RFI), RFA, Part B Post-Closure Permit Application, Post-Closure Permit operating records, and sampling and analysis data.

The SWMUs discussed in this report are located within Ciniza's property boundary. Ciniza is a crude oil refining facility located in McKinley County, New Mexico, at Township 15 North, Range 15 West, Sections 28 and 33, the northern one-third of Section 4 of the New Mexico coordinate system. Ciniza is on the north side of Interstate 40, approximately 17 miles east of Gallup, New Mexico.

Ciniza was constructed in 1957. Current Ciniza operations include production of multiple grades of unleaded gasoline, two grades of jet fuel, kerosene, diesel, residual fuel, butane, and propane. The

refinery is supported by a tank farm. The refinery facility and location of each SWMU within the facility are shown in Map 1. Each SWMU is also shown in the figures provided in the following sections of this report.

In August 1987, an RFA was conducted at Ciniza that identified 17 SWMUs and 10 units of concern that required investigation as suspected sources of hazardous material releases to the environment. From the original 27 SWMUs identified in the RFA, the U.S. Environmental Protection Agency (EPA) identified and designated 13 SWMUs in the permit issued to Ciniza in 1998 under the Hazardous and Solid Waste Amendments of 1984 (HSWA permit). The *Aeration Basin*, not previously classified as either a SWMU or unit of concern, was added to the list in Ciniza's HSWA Permit as (i) *Aeration Basin*, resulting in 14 SWMUs. In 1990, in response to permit requirements, Ciniza conducted a release verification and source characterization study and developed a site-specific RFI Work Plan. In the RFI Work Plan, the *Inactive Land Treatment Area* and the *Drainage Ditch* were combined to become SWMU No. 9, the *Drainage Ditch Near the Inactive Land Farm*, resulting in 13 SWMUs.

The Ciniza SWMU numbering system differs in the various Ciniza and EPA reference documents related to SWMUs. The 1998 HSWA permit lists each SWMU preceded by a lowercase Roman numeral. The lowercase Roman numeral reflects the document numbering format, not SWMU identification number. The 1990 RFI Work Plan provides the first SWMU numbering system for the 14 SWMUs. EPA correspondence (1994) refers to both the RFI Work Plan numbering system and to Arabic numbers assigned to the roman numerals used in the HSWA permit as a format numbering system. Table 1 provides a crosswalk between the SWMU numbers designated in the various reference documents. This NFA proposal report uses the SWMU numbering system from the RFI Work Plan, which is also used in the Land Treatment Unit (LTU) Part B post-closure permit application and LTU Post Closure Permit.

Between November 1990 and October 1992, Ciniza prepared three RFI reports covering the 14 SWMUs and submitted them to the EPA for review and comment. Based on the nature and extent of contamination detected during the RFI, 10 of the SWMUs were recommended for NFA. The four remaining SWMUs were recommended for corrective action. Voluntary Corrective Action Plans (VCAPs) were prepared for these four SWMUs and submitted to EPA for review. The attachments to this NFA proposal report describe the activities conducted during RFIs and corrective actions conducted, as required. Table 2 provides the SWMU number, SWMU title, and current status of the Ciniza SWMUs.

Table 1. Ciniza Refinery—Solid Waste Management Unit Identification

Description	HSWA ¹ Permit 1988	RFI ² Work Plan 1990	EPA ³ Letters 1994	LTU ⁴ Post-Closure Care Permit 2000
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
API Separator		14		14

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

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

³Solid Waste Management Unit Numbers as designated in the EPA letters (provided in SWMU Reports).

⁴Solid Waste Management Unit Numbers as designated in the RCRA Post-Closure Care Permit (Module IV, Appendix A).

Table 2. Solid Waste Management Units

SWMU No. ¹	SWMU Title	Status	Report
1	Aeration Basin (i) ²	EPA approval of NFA given in January 1994. Survey plat submitted to EPA. Investigative process complete. Five-year sampling of soil around basin required again in 2001. Part of NMOCD regulated process waste water treatment system and exempt from RCRA regulation.	Appendix I-1 ³ : Aeration Basin - SWMU No. 1 Summary Report
2	Evaporation Ponds (ii)	EPA approval of NFA given in January 1994. Investigative process complete. Follow-up monitoring required. Survey plat submitted. Five-year sampling required again in 2001. Part of NMOCD regulated process waste water treatment system and exempt from RCRA regulation.	Appendix I-2 ³ : Evaporation Ponds - SWMU No. 2 Summary Report
3	Empty Container Storage Area (v)	EPA approval of NFA given January 1994. Investigative process complete. Survey plat submitted to EPA. Corrective action complete.	Appendix I-3 ³ : Empty Container Storage Area - SWMU No. 3 Summary Report
4	Old Burn Pit (viii)	RFI 1990; sampling report identified corrective action. Site capped in 1998. Investigative process complete. Survey plat submitted. Corrective action complete	Appendix I-4 ³ : Old Burn Pit - SWMU No. 4 Summary Report
5	Landfill Areas (vii)	VCAP submitted February 1993 and approved in January 1994. Closure plan prepared and certified by PE, 1998.	Appendix I-5 ³ : Landfill Areas - SWMU No. 5 Closure Certification
6	Tank Farm—Leaded Gasoline Tanks (iii)	VCAP submitted in April 1996. Investigative process complete. Corrective action currently under way. Survey plat submitted.	Appendix I-6 ³ : Tank Farm—Leaded Gasoline Tanks - SWMU No. 6 Summary Report
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 submitted. Corrective action complete.	Appendix I-7 ³ : Fire Training Area - SWMU No. 7 Summary Report
8	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 submitted.	Appendix I-8 ³ : Railroad Rack Lagoon - SWMU No. 8 Summary Report

Table 2. Solid Waste Management Units (continued)

SWMU No. ¹	SWMU Title	Status	Report
9	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 submitted to EPA. Corrective action complete.	Appendix I-9 ³ : Drainage Ditch and the Inactive Land Farm - SWMU No. 9 Summary Report
10	Sludge Pits (ix)	VCAP submitted in December 1992, and approved in January 1994. RFI sampling complete. Investigative process complete. Survey plat submitted. Corrective action complete.	Appendix I-10 ³ : Sludge Pits - SWMU No. 10 Summary Report
11	Secondary Oil Skimmer (xi)	RFI sampling complete. Report on additional RFI sampling suggested NFA. Investigative process complete. Corrective action complete. Survey plat submitted.	Appendix I-11 ³ : Secondary Oil Skimmer - SWMU No. 11 Summary Report
12	Contact Wastewater Collection System (CWWCS) (xii)	Investigative process complete. EPA requires inspection every 5 years. Ciniza currently repairing and inspecting system. Part of NMOCD regulated process waste water treatment system and is exempt from RCRA regulation.	Appendix I-12 ³ : Contact Wastewater Collection System - SWMU No. 12 Summary Report
13	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 submitted to EPA. Soil sampling collected around drainage ditch required again in 2001. Part of NMOCD regulated process waste water treatment system and is exempt from RCRA regulation.	Appendix I-13 ³ : Drainage Ditch Between API Evaporation Ponds and Neutralization Tank Evaporation Ponds - SWMU No. 13 Summary Report
14	API Separator	Active ⁴	

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

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

³Part B Post-Closure Permit Application, Volume III. May 2000.

⁴RCRA Post-Closure Care Permit, Module IV, Appendix A, August 2000

**TO VIEW THE MAP AND/OR
MAPS WITH THIS DOCUMENT,
PLEASE CALL THE
HAZARDOUS WASTE BUREAU
AT 505-476-6000 TO MAKE AN
APPOINTMENT**