



David

February 11, 2003

Wayne Price
Environmental Bureau
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505



RE: January 2003 Progress Report
Giant Refining Co., Ciniza Refinery GW-032 Discharge Plan

Dear Mr. Price:

As your office has requested, Ciniza is submitting a progress report on the Discharge Plan renewal issues identified in our 12/10/02 meeting. Each month we will update you on progress made on the individual issues included in your meeting summary report. We have numbered the issues to make it easier to document and report. A copy of your list is attached. Enclosed is a copy of a facility drawing prepared by Bill Kingsley and previously used to discuss the site. We have also included a map of the main tank farm.

1. Three additional nested wells around ponds - Bill Kingsley, of Precision Engineering, Inc., visited the refinery on 1/29/03 to discuss and locate 3 potential sites on the north and west perimeter of the site. A map of the locations was faxed to you, but we were not able to discuss these with you at the time. Bill will put together a packet containing costs, time requirements, well construction details and any other pertinent information. We will include it in next month's report. He believes that these areas will give us the greatest probability of finding water. As soon as the new wells at the appropriate depths are producing, we would like to close OW-2 and OW-3. We have submitted details previously about the poor construction and production from these wells. Closing the wells on the same trip will save Giant a significant amount over having to schedule and mobilize Precision Engineering a second time for the well closings. Bill feels that the new wells will provide better monitoring for the groundwater in this area. Giant will notify OCD and HWB prior to drilling so that you will have time to schedule a site visit. (Dark blue dots on the map.)
2. Investigate tank farm area near recovery wells and install possible French drain - Bill Kingsley has logs from borings in the areas of both tank farm sites where recovery wells are located. These will be sent in one of the monthly progress reports. Please see the enclosed site map and tank farm maps for more information. Some of the borings are north of and outside the tank farm berms. (Circled in red on the map.)
3. Investigate around old OW-20 high pH area - Again, Bill will provide boring data from the area where OW-20 was located. We made several attempts to drill another well in the same area, but encountered no water. The site map indicates both the old and new OW-20 locations. (Circled in orange on the map.)

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505-722-3833
FAX
505-722-0210

ROUTE 3
BOX 7
GALLUP
NEW MEXICO
87301

4. Investigate past OW-29. Find possible channels – OW-29 has never shown any contamination. We are unclear why this area may need to be investigated. We believe that OW-14, which has shown very low levels of contaminants, should continue to be monitored annually for volatiles by Method 8260. (Circled in light green on the map.)
5. Inspect the truck center – Giant's travel center has been notified and is available for inspection at your convenience.
6. Find out where OW-17 was located. Now closed, but was originally located w/in tank farm. Sonsela wells were closed in this area. – Ciniza has submitted this information previously, but will include it again in a future monthly progress report. The site map and tank farm maps are marked to show the area of interest. OW-17 was located near Tank 345. (Circled in red on the map.)
7. Prevent runoff from the old temporary pond area – The west dike on temporary pond #2 had previously been cut to allow normal drainage as requested. When salt in the water from this area became an issue, the cut in the dike was filled in and a 6" pipe with a valve on the outer end was put in place. The valve can be chained and locked in the closed position to prevent unauthorized persons from opening it, if necessary.
8. Show drainage ditches on drawings – Ciniza Refinery has prepared an Integrated Contingency Plan (ICP), including an SPCC plan, and a Stormwater Pollution Prevention Plan (SWP3) which show drainage patterns in addition to materials of significance, tank contents, locations of chemical use and storage, emergency procedures and response plans, etc. These documents will be submitted as 'Volume 2' of the Discharge Plan submittal. Included will be a topographic map of the area. (Site maps enclosed)
9. Submit storm water plan – see #8 above
10. Giant wants to monitor only OW-11, 12, 14, 29, 30 and MW 4 – We would like to develop an appropriate list of wells to be monitored, a sampling schedule that will provide needed information, and a list of parameters appropriate to contaminants needing monitoring. We will propose these as part of our submittal. We believe that OCD's and the HWB's requirements can be met without incurring extraordinary expense and personnel time for Giant.
11. Giant wants to close OW-2 and OW-3 and replace with new ones – see #1 above (Circled in dark blue on the map.)
12. Giant does not want to monitor OW-1, OW-9, and OW-10. RCA wants these wells to be checked to make sure they are still under artesian conditions – We believe that OW-1 should be monitored annually as part of the groundwater discharge plan conditions, along with the 3 new well locations proposed in #1. OW-9 and OW-10 will be visually checked annually at the same time sampling is done to ensure continued artesian conditions. It may be appropriate to sample these 2 wells at 5-year intervals (i.e., as part of the Discharge Plan renewal). As of 2/6/03 these 3 wells have artesian flow. (Circled in light blue on the map.)
13. NMED (RCRA) wants MW-1, 4, 5 and SMW-4 monitored (LTU) – These wells are sampled as required in the RCRA Post-Closure Permit issued 8/17/00. OCD will receive copies of all analytical results at the same time that they are submitted to NMED's Hazardous Waste Bureau.
14. RCA wants Pond #2 sampled – As we understand this item, the outlet at Pond #2 will be the compliance point for sampling for the wastewater treatment system / evaporation pond

system interface. Parameters will be established by OCD as part of the new Discharge Plan. Ciniza would like to confirm this interpretation as soon as possible.

15. Old API must be rebuilt or demonstrate that it is not leaking – The API Separator is scheduled for cleaning and inspection in April, 2003. As we understand the timing on construction for the new API, the unit must be complete and functional by 12/31/04. We would like to confirm this date as soon as possible.
16. Giant must complete pressure testing all plant drain lines, sumps, including the tank farms, etc. by 6/1/03. – Enclosed we are submitting documentation of all testing and repairs completed as of 1/31/03. As the system continues to be inspected, the documentation will be included with the monthly progress reports.
17. Giant must complete Discharge Plan submittal by 10/1/03 with monthly progress reports – We are currently working on the data collection and formatting for the plan using the 'Guidelines for Preparation' as our guidance. As noted above, the facility's ICP, SPCC, and SWP3 plans will provide much of the information required. We would like to confirm this deadline.
18. RCA wants monthly progress reports. – We plan to submit progress reports by the 20th of the month following the activities (2/20/03 for January 2003 activities).
19. Issues of geological channels need to be resolved – OCD and Giant will need to discuss this in more detail with Bill Kingsley. Giant would like some further guidance on OCD's and NMED's concerns. Neither I, nor Ed Riege, were present at the meeting where this was discussed.
20. LWP to spell out in DP all samples to be taken from which wells and analysis, including frequency – Giant will propose a sampling schedule, including wells, parameters and frequency. We will work with OCD and HWB to ensure monitoring will provide adequate information on the groundwater conditions at the facility.

Please feel free to contact me at 505.722.0227 or @ dmancini@giant.com with any questions or concerns you have regarding this report. Thank you for your assistance with our Discharge Plan submittal.

Sincerely



Dorinda Mancini
Environmental Manager, Ciniza Refinery

Enc

CC: Roger Anderson, OCD
✓ Dave Cobrain, HWB
Ed Riege, Env. Superintendent
Matthew Davis, General Manager (w/o enc.)
file

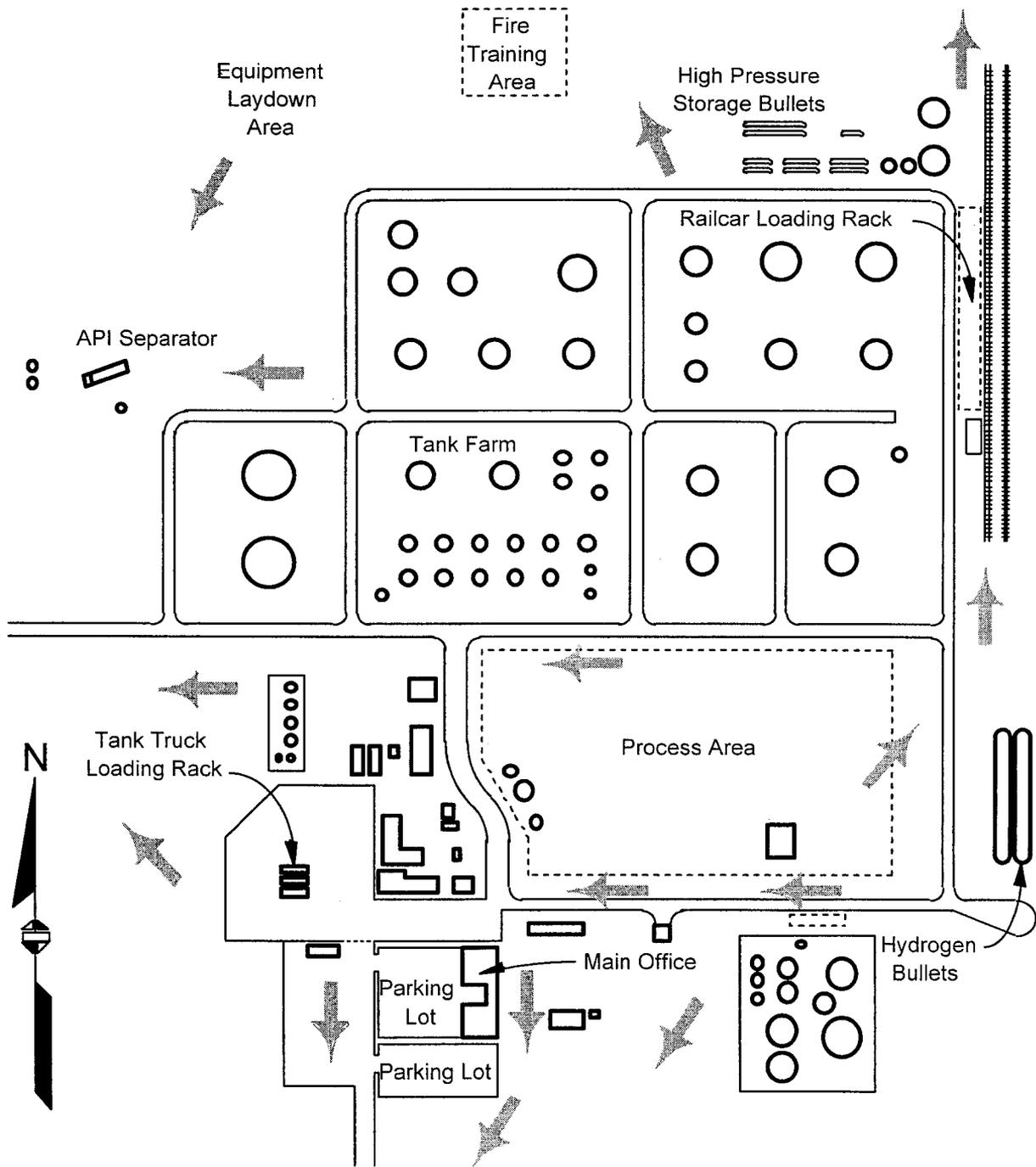
12/10/02 Meeting held with Giant-Ciniza: GW-032 Dorinda Mancini, Ed Riege, LWP, RCA, Dave Cobrain.

Minutes of meeting: OCD to require the following:

1. Three additional nested wells around ponds.
2. Investigate tank farm area near recovery wells and install possible French drain
3. Investigate around old OW-20 high PH area
4. Investigate past OW-29 Find possible channels
5. Inspect the truck center
6. Find out where old OW17 was located. Now closed was inside of tank farm. Sonsela wells were closed in this area.
7. Prevent run-off from old pond area.
8. Show drainage ditches on drawings
9. Submit storm water plan
10. Giant wants to monitor only OW-11,12,14,29, 30 + MW-4
11. Giants wants to close OW-2&3 replace with new ones
12. Giant does not want to monitor OW-1,9,10 RCA wants these wells to be checked to make sure they are still under Artesia conditions.
13. NMED (RCRA) wants MW-1,4,5 SWM-4 old LTU
14. RCA wants pond #2 to be sampled.
15. Old API must be rebuilt or demonstrate it is not leaking.
16. Giant must complete pressure testing all plant drain lines, sumps, including tank farms, etc. by June 1, 2003
17. Giant must complete DP submittal by Oct 1, 2003 with monthly progress reports.
18. RCA wants monthly progress report.
19. Issues of geological channels needs to be resolved.
20. LWP to spell out in DP all samples to be taken from which wells and analysis, including frequency.

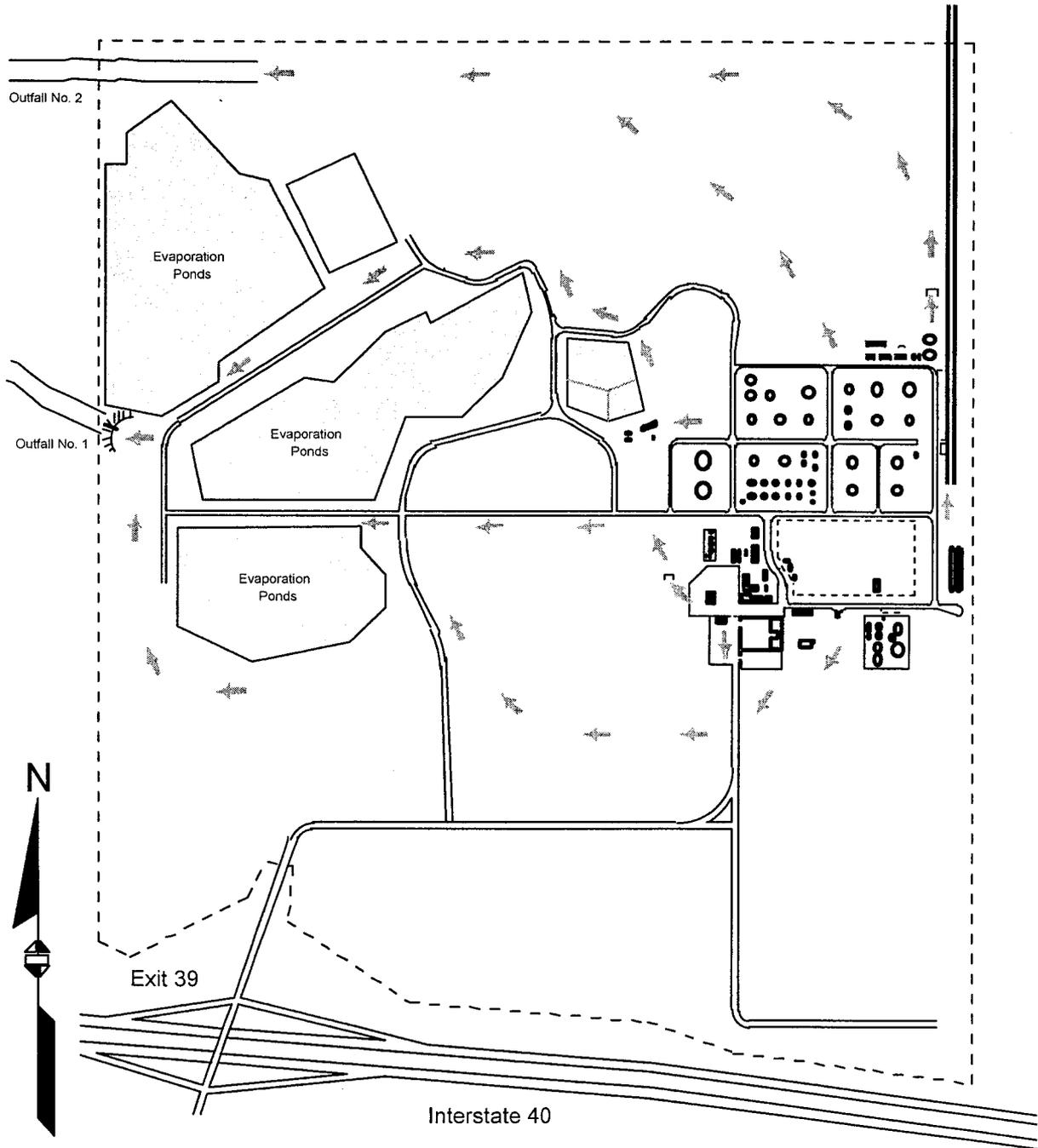
Storm Water Pollution Prevention Plan	Revision 0
Prepared by: SWPPP Team	6/21/02

Figure No. 2
Refinery Site Map
Unconfined Storm Water Flow Direction



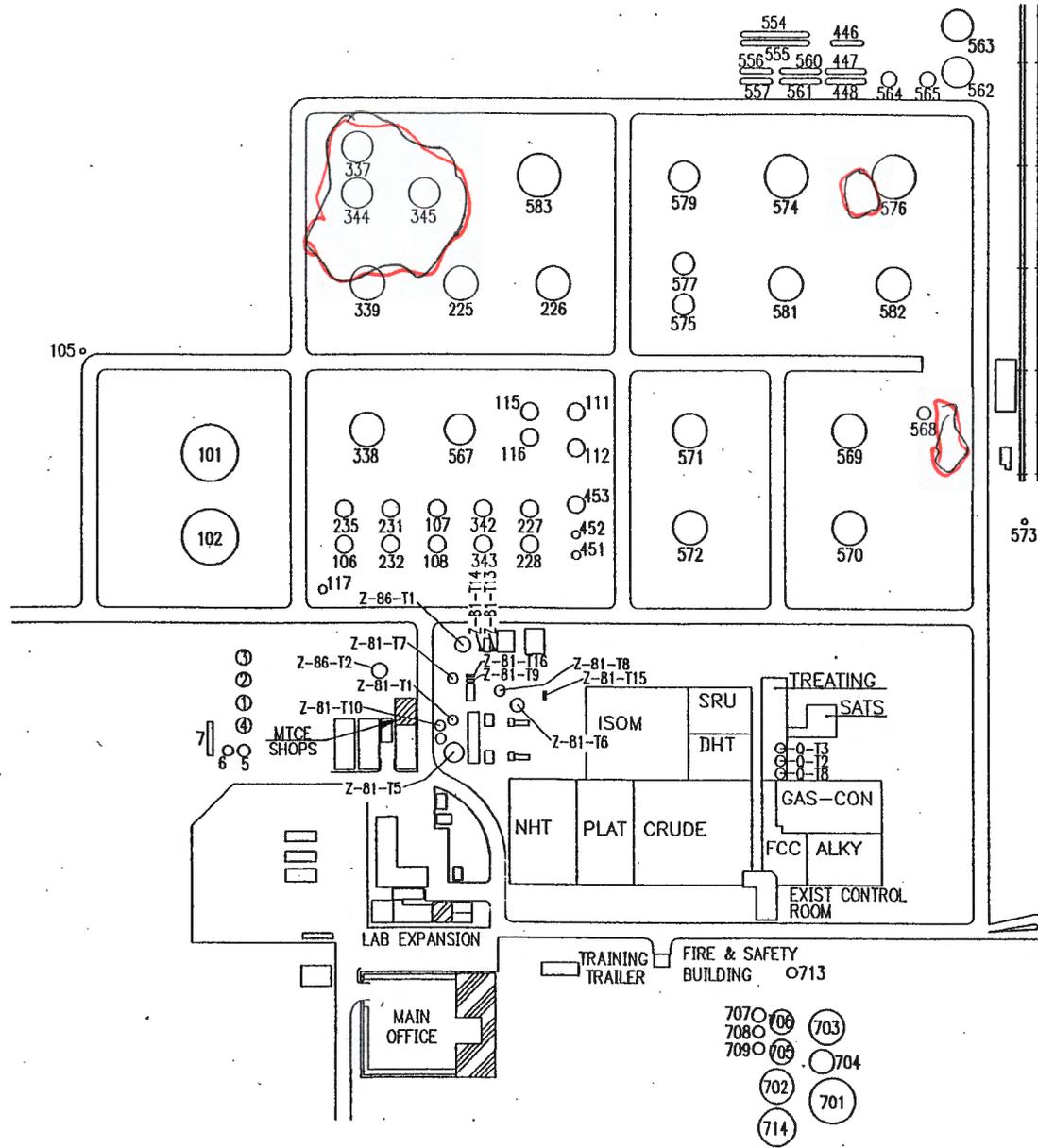
Storm Water Pollution Prevention Plan	Revision 0
Prepared by: SWPPP Team	6/21/02

Figure No. 3
Property Site Map
Unconfined Storm Water Flow Direction





554 446
 556 555 560 447
 557 561 448 564 565 562



CONTRACTOR:			
CINZA REFINERY	GIANT REFINING CO. A DIVISION OF GIANT INDUSTRIES	CALLUP NEW MEXICO	
GIANT REFINERY TANK FARM PLAN			
DRN. BY: CLM	DATE: 10DEC02	RFE/RFC No: -	
CHK'D. BY: -	DATE: -	SCALE: NTS	
APP'D. BY: -	DATE: -	CAD REF: G/SULLIVAN	
WELD SPEC: -	PANE: -		
DRAWING NO. Z-01-100			REV 0



Ciniza Refinery Sewer Test Form

REFINING COMPANY Test Data for Main Line Upstream of Listed Manhole

Unit: _____ Plat _____
 Test Fluid: Water
 Test Water Column (ft.): 3 + (in manholes, 1-3 from sewer pipe inverts connecting manholes) _____
 Test Duration (min.): 25
 Manhole Number: P-8, P-5, P-6, & P-7 _____
 Date: 1/23/03 _____

Were all process sewer cup branches from the above manholes filled with water to verify that branch lines held level?



No

Did all branch lines hold level?

Yes



List any branch lines and location of branch lines that did not hold level (if any):
 Sewer cup by P-V3. A work order has been written to repair this item. _____

Test Witness Signature: _____

B. Lopez

Work Order

2/13/2003

WO49101 - Repair Sewer cup at P-V3 and/or branch line.

Equipment: -	Status: CLOSE
Location: 13_SEWER	Report Date: 2/3/2003
Job Plan: -	Start Date: 2/6/2003
Parts reserved in warehouse:	Finish Date: 2/7/2003
Comments:	Parent:
	Sequence: 0.00
	Reported By: BLOOS
	Lead Craft:
	Priority: 3.00

Failure Report:

<u>JPOPERATION DESCRIPTION</u>	<u>DURATION</u>

DATE: _____ START: _____ FINISH: _____
DATE: _____ START: _____ FINISH: _____
DATE: _____ START: _____ FINISH: _____
DATE: _____ START: _____ FINISH: _____ OPERATOR: _____
DATE COMPLETED: _____ COMPLETED BY: _____ SUPERVISOR: _____