

GRCC 2003

Giant
Ciniza

July 31, 2003

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 9895

Ms Dorinda Mancini
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

RE: Discharge Plan GW-032
Ciniza Refinery
McKinley County, New Mexico

Subject: **Wastewater from Travel Center and Truck Stop Facility**

Dear Ms. Mancini:

The New Mexico Oil Conservation Division (OCD) conducted an on-site interview with Giant Refining Company (Giant) environmental personnel and consultants on July 23, 2003. The purpose of the meeting was to discuss issues concerning waste, groundwater, best management practices and future conditions for the plan. During the meeting Giant confirmed that the adjacent Travel Center had been sold and was not part of Giant Refining Company. The OCD is hereby notifying Giant that OCD does not have regulatory authority over such facilities since it is no longer associated with an oil and gas facility.

It appears that the New Mexico Environment Department would be the regulatory agency for the Travel Center. In order for OCD to allow wastewater from the Travel Center to continue to be disposed of at the Giant Ciniza refinery, OCD will require Giant to incorporate the following conditions and controls into the discharge plan permit upon receipt of this letter.

1. Any wastewater received from the Travel Center and Truck Stop shall be treated in the refinery aeration treatment system before being discharged to the evaporation ponds.
2. The by-pass line, or any other by-pass means, whether by pipe, surface/sub-surface flow shall be disconnected, plugged and/or prevented from flowing into the evaporation ponds before treatment.

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3. All wastewater received from the Travel Center shall be EPA RCRA Non-Hazardous as defined in 40 CFR part 261 and shall within 120 days of receipt of this letter meet the treatment standards found in NM WQCC 20.6.2.2101 and shall not contain phase separated hydrocarbons.
4. Giant shall design, implement and maintain a sampling, contingency and reporting plan. All emergency up-sets shall be reported to OCD within 24 hours. This plan shall be incorporated into the discharge plan permit subject to OCD approval.

Please be advised that NMOCD approval of any plan concerning this issue does not relieve Giant of liability should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Giant of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions please do not hesitate to contact me at 505-476-3487 or E-mail WPRICE@state.nm.us.

Sincerely,



Wayne Price- Engineer

cc: Roger C. Anderson-Environmental Bureau Chief
OCD Aztec Office
Dave Cobrain-NMED Haz-waste