

GRC 2003



May 24, 2004

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

Dave Cobrain
Hazardous Waste Bureau
NMED
2905 Rodeo Park Drive East, Bldg.
Santa Fe, NM 87505



RE: SWMU 8 – Railroad Rack Lagoon - Permit No. NMD 000333211-1
Use of Remediated Soil from the Northeast OCD Landfarm – GW-032

Dear Wayne and Dave:

Ciniza Refinery requests permission to use the soil, currently on the Northeast OCD Landfarm, to construct a 2-foot berm around this landfarm. Any remaining soil will be placed back into the Lagoon after we have established that all waste sludge has been removed and the lagoon is clean. The TPH has dropped from a range of 25,000 to 40,000 ppm to ~2000 PPM. There is no gasoline range TPH. Please see attached spreadsheet and analytical results.

Samples will be taken of the bottom of the lagoon, and clean closure standards will be met by comparing the bottom soil of the lagoon to soil from the Below Treatment Zone (BTZ) of the nearby NE OCD Landfarm. Once these standards are met, any remediated soil remaining after construction of the berm will be placed back in the lagoon.

The remaining RRR Lagoon sludge will be removed and spread on the NE OCD Landfarm. We expect that all the remaining sludge in the lagoon can be landfarmed with one application. The attached spreadsheet and analytical results contain information about the contaminant levels of the sludge.

Your timely response is appreciated, since this work must be done at the same time as the dike work between ponds 5 & 6. We will be using the same contractor and equipment for both projects. Please contact me at 505.722.0227 if you have questions or concerns. Again, thank you for your assistance with this request.

Sincerely
Dorinda Mancini
Dorinda Mancini
Environmental Manager, Ciniza Refinery

Enc.

cc: Denny Foust, Aztec Office
Ed Riege, Environmental Superintendent, Giant Refining Co.

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