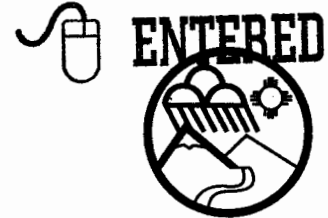




BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 25, 2005

Mr. Randy Schmaltz
Safety Supervisor
Giant Refining Company-Ciniza
Rt.3 Box 7
Gallup, New Mexico 87301

Mr. Ed Riege
Environmental Superintendent
Giant Refining Company-Ciniza
Rt. 3 Box 7
Gallup, New Mexico 87301

**RE: REQUEST FOR COMMENTS ON CHANGES FOR THE ANNUAL UNIT AUDIT
FOR CALENDAR YEAR 2004**

Dear Messrs. Schmaltz and Riege:

Enclosed please find the calendar year 2004 draft Annual Unit Audit (AUA) tables developed pursuant to 20.4.2 NMAC for your facility. The New Mexico Environment Department (NMED) is providing a comment period for facility owners or operators to identify any changes that should be reflected in the AUA tables for calendar year 2004. The tables are formatted accordingly: 1) Table A includes all operating, closure, and post-closure care units; 2) Table B includes corrective action units (e.g. SWMUs); and 3) Table C is the summary of all units.

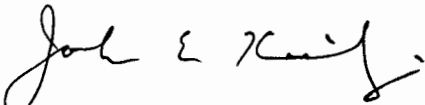
If your facility has operating unit(s) that did not manage hazardous waste for the entire 2004 calendar year, an affidavit must be provided to NMED affirming no such activity. In those cases NMED will not invoice the unit for the 2004 Annual Hazardous Waste Management Business Fee (AHWMBF). Please provide the affidavit with your comments by the close of business June 14, 2005.

Under the provisions of 20.4.2.201 NMAC the AUA is also used to determine the AHWMBF for your facility. **Do not** calculate and submit the AHWMBF based on these tables. An invoice will be mailed with the Final Annual Unit Audit on June 30, 2005.

Draft 2004 Annual Unit Audit
April 25, 2005
Page 2

Should you have any questions concerning this letter or the Annual Unit Audit process please call me at (505) 428-2535.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

John E. Kieling
Manager
Permits Management Program

Enclosure

cc: J. Bearzi, NMED HWB
H. Monzeglio, NMED HWB
File: Reading and AUA 2004

TABLE A
Giant Refining Company - Ciniza Draft 2004 AUA
OPERATING, CLOSURE AND POST-CLOSURE CARE UNITS

Unit ID No.	Unit Type/Description	Process	Comments	Fee
LDF 1	Land Farm Not Clean Closed	Post-Closure		\$2,000.00
			Total Annual Fee:	\$2,000.00

TABLE B
Giant Refining Company - Ciniza Draft 2004 AUA
CORRECTIVE ACTION UNITS

Count	Unit ID No.	Unit Type/Description	Comments	Fee
1	SWMU 1	Aeration Basin		\$250.00
2	SWMU 2	Evaporation Ponds		\$250.00
3	SWMU 3	Empty Container Storage Area		\$250.00
4	SWMU 4	Old Burn Pit		\$250.00
5	SWMU 5	Landfill Areas		\$250.00
6	SWMU 6	Tank Farm		\$250.00
7	SWMU 7	Fire Training Area		\$250.00
8	SWMU 8	Railroad Rack Lagoon		\$250.00
9	SWMU 9	Drainage Ditch Near Inactive Landfarm		\$250.00
10	SWMU 10	Sludge Pits		\$250.00
11	SWMU 11	Secondary Oil Skimmer		\$250.00
12	SWMU 12	Contact Wastewater Collection System		\$250.00
13	SWMU 13	Drainage Ditch between N & S Evaporation Ponds		\$250.00
14	SWMU 14	API Separator		\$250.00
Total Annual Fee:				\$3,500.00

TABLE C
Giant Refining Company - Ciniza Draft 2004 AUA
SUMMARY OF UNITS AND FEE ASSESSMENT

Number of Units	Unit Type	Fee
0	Storage	\$0.00
0	Treatment	\$0.00
0	Disposal	\$0.00
1	Post Closure Care	\$2,000.00
14	Corrective Action	\$3,500.00
Total Annual Fee:		\$5,500.00