



**Monzeglio, Hope, NMENV**

**From:** Steve Morris [smorris@giant.com]  
**Sent:** Wednesday, April 12, 2006 10:23 AM  
**To:** Chavez, Carl J, EMNRD; Cobrain, Dave, NMENV; Monzeglio, Hope, NMENV; Price, Wayne, EMNRD  
**Cc:** Ed Riege; Jim Lieb; Johnny Sanchez  
**Subject:** Evap. Pond #2 bank material.

The lab analysis from the samples taken at the waters edge of pond #2 is attached.

The Diesel Range Organics appear to be the main item of concern. Due to the difficulty in getting equipment into the area, we would like to add enzymes to the inlet water and raise the level of the pond a couple of inches.

In doing this, I believe we could eliminate the DRO without disturbing the surrounding areas.

During my daily inspections of the ponds, I have not seen any evidence of free hydrocarbon or sheen on the surface of pond #2.

If you have any questions or concerns please give me a call at 505-722-0258.

Thanks, Steve Morris

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COVER LETTER

Friday, April 07, 2006

Steve Morris  
Giant Refining Co  
Rt. 3 Box 7  
Gallup, NM 87301

TEL: (505) 722-3833  
FAX (505) 722-0210

RE: Evap. Pond #2 Bank Material

Order No.: 0603352

Dear Steve Morris:

Hall Environmental Analysis Laboratory received 3 sample(s) on 3/31/2006 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent.

Reporting limits are determined by EPA methodology. No determination of compounds below these (denoted by the ND or < sign) has been made.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman".

Andy Freeman, Business Manager  
Nancy McDuffie, Laboratory Manager

AZ license # AZ0682  
ORELAP Lab # NM100001



**Hall Environmental Analysis Laboratory**

**Date: 07-Apr-06**

**CLIENT:** Giant Refining Co  
**Project:** Evap. Pond #2 Bank Material  
**Lab Order:** 0603352

**CASE NARRATIVE**

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"S" flags denote that the surrogate was not recoverable due to sample dilution or matrix interferences.

# Hall Environmental Analysis Laboratory

Date: 07-Apr-06

CLIENT: Giant Refining Co  
 Lab Order: 0603352  
 Project: Evap. Pond #2 Bank Material  
 Lab ID: 0603352-01

Client Sample ID: Pond 2 Bank 1  
 Collection Date: 3/30/2006 3:00:00 PM  
 Date Received: 3/31/2006  
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	64000	2000		mg/Kg	200	4/7/2006 4:36:46 AM
Motor Oil Range Organics (MRO)	ND	10000		mg/Kg	200	4/7/2006 4:36:46 AM
Surr: DNOP	0	60-124	S	%REC	200	4/7/2006 4:36:46 AM
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range Organics (GRO)	ND	250		mg/Kg	50	4/6/2006 2:04:24 PM
Surr: BFB	109	79-128		%REC	50	4/6/2006 2:04:24 PM
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	5.0		mg/Kg	50	4/6/2006 2:04:24 PM
Benzene	ND	2.5		mg/Kg	50	4/6/2006 2:04:24 PM
Toluene	ND	2.5		mg/Kg	50	4/6/2006 2:04:24 PM
Ethylbenzene	ND	2.5		mg/Kg	50	4/6/2006 2:04:24 PM
Xylenes, Total	ND	2.5		mg/Kg	50	4/6/2006 2:04:24 PM
Surr: 4-Bromofluorobenzene	99.2	84.4-117		%REC	50	4/6/2006 2:04:24 PM

Qualifiers: \* Value exceeds Maximum Contaminant Level  
 E Value above quantitation range  
 J Analyte detected below quantitation limits  
 S Spike Recovery outside accepted recovery limits  
 B Analyte detected in the associated Method Blank  
 H Holding times for preparation or analysis exceeded  
 ND Not Detected at the Reporting Limit

**Hall Environmental Analysis Laboratory**

Date: 07-Apr-06

CLIENT: Giant Refining Co  
 Lab Order: 0603352  
 Project: Evap. Pond #2 Bank Material  
 Lab ID: 0603352-02

Client Sample ID: Pond 2 Bank 2  
 Collection Date: 3/30/2006 3:20:00 PM  
 Date Received: 3/31/2006  
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	200000	2000		mg/Kg	200	4/7/2006 5:41:56 AM
Motor Oil Range Organics (MRO)	ND	10000		mg/Kg	200	4/7/2006 5:41:56 AM
Surr: DNOP	0	60-124	S	%REC	200	4/7/2006 5:41:56 AM
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range Organics (GRO)	ND	250		mg/Kg	50	4/6/2006 2:32:15 PM
Surr: BFB	113	79-128		%REC	50	4/6/2006 2:32:15 PM
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	5.0		mg/Kg	50	4/6/2006 2:32:15 PM
Benzene	ND	2.5		mg/Kg	50	4/6/2006 2:32:15 PM
Toluene	ND	2.5		mg/Kg	50	4/6/2006 2:32:15 PM
Ethylbenzene	ND	2.5		mg/Kg	50	4/6/2006 2:32:15 PM
Xylenes, Total	ND	2.5		mg/Kg	50	4/6/2006 2:32:15 PM
Surr: 4-Bromofluorobenzene	103	84.4-117		%REC	50	4/6/2006 2:32:15 PM

Qualifiers: \* Value exceeds Maximum Contaminant Level  
 E Value above quantitation range  
 J Analyte detected below quantitation limits  
 S Spike Recovery outside accepted recovery limits  
 B Analyte detected in the associated Method Blank  
 H Holding times for preparation or analysis exceeded  
 ND Not Detected at the Reporting Limit

# Hall Environmental Analysis Laboratory

Date: 07-Apr-06

CLIENT: Giant Refining Co  
 Lab Order: 0603352  
 Project: Evap. Pond #2 Bank Material  
 Lab ID: 0603352-03

Client Sample ID: Pond 2 Bank 3  
 Collection Date: 3/30/2006 3:40:00 PM  
 Date Received: 3/31/2006  
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015B: DIESEL RANGE ORGANICS</b>						Analyst: SCC
Diesel Range Organics (DRO)	110000	2000		mg/Kg	200	4/7/2006 6:15:18 AM
Motor Oil Range Organics (MRO)	ND	10000		mg/Kg	200	4/7/2006 6:15:18 AM
Surr: DNOP	0	60-124	S	%REC	200	4/7/2006 6:15:18 AM
<b>EPA METHOD 8015B: GASOLINE RANGE</b>						Analyst: NSB
Gasoline Range Organics (GRO)	ND	250		mg/Kg	50	4/6/2006 3:00:08 PM
Surr: BFB	116	79-128		%REC	50	4/6/2006 3:00:08 PM
<b>EPA METHOD 8021B: VOLATILES</b>						Analyst: NSB
Methyl tert-butyl ether (MTBE)	ND	5.0		mg/Kg	50	4/6/2006 3:00:08 PM
Benzene	ND	2.5		mg/Kg	50	4/6/2006 3:00:08 PM
Toluene	ND	2.5		mg/Kg	50	4/6/2006 3:00:08 PM
Ethylbenzene	ND	2.5		mg/Kg	50	4/6/2006 3:00:08 PM
Xylenes, Total	ND	2.5		mg/Kg	50	4/6/2006 3:00:08 PM
Surr: 4-Bromofluorobenzene	107	84.4-117		%REC	50	4/6/2006 3:00:08 PM

Qualifiers: \* Value exceeds Maximum Contaminant Level  
 E Value above quantitation range  
 J Analyte detected below quantitation limits  
 S Spike Recovery outside accepted recovery limits  
 B Analyte detected in the associated Method Blank  
 H Holding times for preparation or analysis exceeded  
 ND Not Detected at the Reporting Limit

CLIENT: Giant Refining Co  
 Work Order: 0603352  
 Project: Evap. Pond #2 Bank Material

**ANALYTICAL QC SUMMARY REPORT**

TestCode: 8015DRO\_S

Sample ID: MB-10114	SampType: MBLK	TestCode: 8015DRO_S	Units: mg/Kg	Prep Date: 4/4/2006	RunNo: 18818						
Client ID: ZZZZZ	Batch ID: 10114	TestNo: SW8015		Analysis Date: 4/5/2006	SeqNo: 467037						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10									
Motor Oil Range Organics (MRO)	ND	50									

Sample ID: LCS-10114	SampType: LCS	TestCode: 8015DRO_S	Units: mg/Kg	Prep Date: 4/4/2006	RunNo: 18818						
Client ID: ZZZZZ	Batch ID: 10114	TestNo: SW8015		Analysis Date: 4/5/2006	SeqNo: 467095						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	42.18	10	50	0	84.4	67.4	117				

Sample ID: LCSD-10114	SampType: LCSD	TestCode: 8015DRO_S	Units: mg/Kg	Prep Date: 4/4/2006	RunNo: 18818						
Client ID: ZZZZZ	Batch ID: 10114	TestNo: SW8015		Analysis Date: 4/5/2006	SeqNo: 467096						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	40.59	10	50	0	81.2	67.4	117	42.18	3.84	17.4	

Qualifiers: E Value above quantitation range      H Holding times for preparation or analysis exceeded      J Analyte detected below quantitation limits  
 ND Not Detected at the Reporting Limit      R RPD outside accepted recovery limits      S Spike Recovery outside accepted recovery limits

CLIENT: Giant Refining Co  
 Work Order: 0603352  
 Project: Evap. Pond #2 Bank Material

## ANALYTICAL QC SUMMARY REPORT

TestCode: 8015GRO\_S

Sample ID: MB-10098	SampType: MBLK	TestCode: 8015GRO_S	Units: mg/Kg	Prep Date: 3/31/2006	RunNo: 18842						
Client ID: ZZZZZ	Batch ID: 10098	TestNo: SW8015	(SW5035)	Analysis Date: 4/5/2006	SeqNo: 467547						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND		5.0								

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Qualifiers:	E Value above quantitation range	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	R RPD outside accepted recovery limits	S Spike Recovery outside accepted recovery limits

CLIENT: Giant Refining Co  
 Work Order: 0603352  
 Project: Evap. Pond #2 Bank Material

## ANALYTICAL QC SUMMARY REPORT

TestCode: 8021BTEX\_S

Sample ID: MB-10098	SampType: MBLK	TestCode: 8021BTEX_S	Units: mg/Kg	Prep Date: 3/31/2006	RunNo: 18842						
Client ID: ZZZZZ	Batch ID: 10098	TestNo: SW8021	(SW5035)	Analysis Date: 4/5/2006	SeqNo: 467531						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Methyl tert-butyl ether (MTBE)	ND	0.10									
Benzene	ND	0.050									
Toluene	ND	0.050									
Ethylbenzene	ND	0.050									
Xylenes, Total	ND	0.050									

Sample ID: LCS-10098	SampType: LCS	TestCode: 8021BTEX_S	Units: mg/Kg	Prep Date: 3/31/2006	RunNo: 18842						
Client ID: ZZZZZ	Batch ID: 10098	TestNo: SW8021	(SW5035)	Analysis Date: 4/5/2006	SeqNo: 467532						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Methyl tert-butyl ether (MTBE)	0.4064	0.10	0.4	0	102	65	132				
Benzene	0.4721	0.050	0.452	0	104	85.6	116				
Toluene	1.859	0.050	1.62	0	115	82.4	120				
Ethylbenzene	0.4260	0.050	0.456	0	93.4	86.4	111				
Xylenes, Total	2.002	0.050	1.8	0	111	78.4	125				

7/08

Qualifiers: E Value above quantitation range  
 ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded  
 R RPD outside accepted recovery limits

J Analyte detected below quantitation limits  
 S Spike Recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory

Sample Receipt Checklist

Client Name GIANTREFIN

Date and Time Received:

3/31/2006

Work Order Number 0603352

Received by AT

Checklist completed by

*[Handwritten Signature]*  
Signature

3/31/06  
Date

Matrix

Carrier name Client drop-off

- Shipping container/cooler in good condition? Yes  No  Not Present
- Custody seals intact on shipping container/cooler? Yes  No  Not Present  Not Shipped
- Custody seals intact on sample bottles? Yes  No  N/A
- Chain of custody present? Yes  No
- Chain of custody signed when relinquished and received? Yes  No
- Chain of custody agrees with sample labels? Yes  No
- Samples in proper container/bottle? Yes  No
- Sample containers intact? Yes  No
- Sufficient sample volume for indicated test? Yes  No
- All samples received within holding time? Yes  No
- Water - VOA vials have zero headspace? No VOA vials submitted  Yes  No
- Water - pH acceptable upon receipt? Yes  No  N/A

Container/Temp Blank temperature?

2° 4° C ± 2 Acceptable  
if given sufficient time to cool.

COMMENTS:

Client contacted \_\_\_\_\_ Date contacted: \_\_\_\_\_ Person contacted \_\_\_\_\_

Contacted by: \_\_\_\_\_ Regarding \_\_\_\_\_

Comments: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective Action \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

# CHAIN-OF-CUSTODY RECORD

QA/QC Package:

Std  Level 4

Other: \_\_\_\_\_

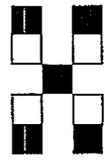
Client: *Giant Refining Company - Cimiga*  
 Address: *Route 3 Box 7 Gallup, NM 87301*

Project Name: *Evap. Pond # 2 Bank Material*

Project #: \_\_\_\_\_  
 Project Manager: *Steve Morris*

Phone #: *505 722 3833*  
 Fax #: *505 722 0210*

Sampler: *Steve Morris*  
 Sample Temperature: *2*



**HALL ENVIRONMENTAL ANALYSIS LABORATORY**  
 4901 Hawkins NE, Suite D  
 Albuquerque, New Mexico 87109  
 Tel. 505.345.3975 Fax 505.345.4107  
 www.hallenvironmental.com

## ANALYSIS REQUEST

Date	Time	Matrix	Sample I.D. No.	Number/Volume	Preservative		HEAL No.	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gasoline Only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	EDC (Method 8021)	8810 (PMA or PAH)	RCRA Metals	Anions (F, Cl, NO <sub>2</sub> , NO <sub>3</sub> , PO <sub>4</sub> , SO <sub>4</sub> )	8081 Pesticides / PCB's (8082)	8260B (VOA)	8270 (Semi-VOA)	Air Bubbles or Headspace (Y or N)	
					HgCl <sub>2</sub>	HNO <sub>3</sub>															
<i>3/30/06</i>	<i>1500</i>	<i>Non Aquifer</i>	<i>Pond 2 Bank 1</i>				<i>060352</i>														
<i>"</i>	<i>1520</i>	<i>"</i>	<i>" " 2</i>				<i>060352-1</i>	<i>X</i>	<i>X</i>												
<i>"</i>	<i>1540</i>	<i>"</i>	<i>" " 3</i>				<i>-2</i>	<i>X</i>	<i>X</i>												
							<i>-3</i>	<i>X</i>	<i>X</i>												

Date: *3/31/06* Time: *0900*  
 Relinquished By: (Signature) *Steve Morris*

Received By: (Signature) \_\_\_\_\_  
 Received By: (Signature) *3/31/06*  
*0900*

Remarks: \_\_\_\_\_

**Monzeglio, Hope, NMENV**

Giant Ciniza

**From:** Price, Wayne, EMNRD  
**Sent:** Wednesday, April 12, 2006 1:21 PM  
**To:** Steve Morris; Chavez, Carl J, EMNRD; Cobrain, Dave, NMENV; Monzeglio, Hope, NMENV  
**Cc:** Ed Riege; Jim Lieb; Johnny Sanchez; Perrin, Charlie, EMNRD; Foust, Denny, EMNRD  
**Subject:** RE: Evap. Pond #2 bank material.

Dear Mr. Morris, Mr. Riege, and Mr. Lieb:

OCD is in receipt of the pond #2 bank soil samples. The DRO ranges from 64,000 mg/kg to 200,000 mg/kg. Please note in the discharge plan approval letter dated June 23, 2004 last paragraph and sentence; Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise *rendered non-hazardous to wildlife including migratory birds.*

The discharge plan application did not specifically request that oily discharges to the evaporation ponds would be part of the operation.

The oily discharge is considered a waste and condition # 13 does not allow oily waste to be disposed of in the evaporation ponds.

(#13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down

Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper

waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by OCD on a case-by-case basis.)

*This waste stream was not approved.* Please note that Section 3104. of the regulations requires that "when a permit has been approved,

discharges must be consistent with the terms and conditions of the permit. Giant is deficient in the fact that it has allowed approved waste to be

discharged and remain in the evaporation ponds which may endanger migratory birds.

Therefore, OCD hereby orders Giant Ciniza to take immediate actions to remove the oily waste from the pond banks in order to protect migratory birds and other wildlife. The waste may be stockpiled on site for a maximum of 6 months until Giant receives approval for final disposal.

*Failure to remove oily soil from the banks by May 31, 2006 will be reason for OCD to issue a Notice of Violation.*

This E-mail authorizes Giant to take immediate emergency response actions. Please provide a weekly report of the operations to Carl Chavez-OCD until deemed complete by OCD.

Please be advised that OCD requirement stated herein does not relieve the owner/operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

**From:** Steve Morris [mailto:smorris@giant.com]  
**Sent:** Wednesday, April 12, 2006 10:23 AM  
**To:** Chavez, Carl J, EMNRD; Cobrain, Dave, NMENV; Monzeglio, Hope, NMENV; Price, Wayne, EMNRD  
**Cc:** Ed Riege; Jim Lieb; Johnny Sanchez  
**Subject:** Evap. Pond #2 bank material.

The lab analysis from the samples taken at the waters edge of pond #2

4/12/2006

is attached.

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In doing this, I believe we could eliminate the DRO without disturbing the surrounding areas.

During my daily inspections of the ponds, I have not seen any evidence of free hydrocarbon or sheen on the surface of pond #2.

If you have any questions or concerns please give me a call at 505-722-0258.

Thanks, Steve Morris

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