

April 12, 2006

Hope Monzeglio Environmental Specialist New Mexico Environment Department Hazardous Waste Bureau 2905 Rodeo Park Drive East, BLDG 1 Santa Fe NM 87505

RE:

Old API Separator Effluent

Giant Refining Company, Ciniza Refinery

EPA No. NMD000333211 HWB-GRCC-MISC



Dear Ms. Monzeglio:

In order to prevent dry weather flow from entering the aeration lagoons untreated, Giant installed a pump at the old API oil water separator (OAPIS) in early March 2006 to pump the dry weather flow to the new API oil water separator for treatment. The pump was installed on about March 3, 2006. A trial period of approximately a week and a half followed during which adjustments were made to ensure the pump could keep up with the flow on a consistent basis. The pump has proved itself capable of handling flows from the OAPIS since the completion of the trial period.

On March 28, 2006 Giant submitted a Commitment to NMED-HWB and OCD that contained plans for a dye trace study and storm sewer blocking element for eliminating dry weather flow to the storm sewers in the process area. The dye trace study is anticipated to be completed in April 2006 and storm sewer blocking of cross connections or other connections to the sewer will be completed by June 1, 2006. Once the storm sewer inputs of dry weather flow have been eliminated, we are looking at routing the storm water to a pond that will serve double duty as storm water retention and as an emergency fire water supply for the refinery. Re-routing of the storm water is anticipated to be completed by July 30, 2006. The OAPIS will then be decommissioned.

If you have any questions regarding this letter, please contact me at (505) 722-0227.

Sincerely

Jim Lieb

Environmental Engineer

Giant Refining – Ciniza Refinery

Cc: Ed Rios Ed Riege