



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
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RON CURRY
SECRETARY

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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

May 5, 2006

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

**SUBJECT: RESPONSE TO THE OLD API SEPARATOR EFFLUENT LETTER
GIANT REFINING COMPANY, CINIZA REFINERY
EPA NO. NMD000333211
HWB-GRCC-MISC**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) is in receipt of Giant Refining Company's, Ciniza Refinery (Permittee) letter dated April 12, 2006, titled *Old API Separator Effluent*. This letter was in response to NMED's letter dated February 3, 2006.

The Permittee must continue to route all effluent discharging from the "Old" API separator to the "New" API Separator until the process wastewater no longer commingles with the storm sewer water. Upon completion of the dye trace study and other investigation of the storm sewer system, the Permittee must submit all study results to NMED and the New Mexico Oil Conservation Division (OCD). The submittal must also provide and identify the "procedures and policy in place to isolate contaminants from storm water" as stated in the *Commitment for Resolution of API Separator Storm Water Issues* presented to NMED on March 28, 2006. The submittal must be in report format and include the following information:

- a. A description of how the dye trace study was performed, the activities that took place, and the results and conclusions of the study.

Mr. Ed Riege
Giant Ciniza Refining Company
May 5, 2006
Page 2 of 2

- b. A description of how and where the storm sewer system was blocked, and the results of each segment of the sewer system testing.
- c. Include the procedures and policy in place to isolate process water from storm water.
- d. Any other additional information.

In the letter the Permittee indicates that diversion of storm water to a proposed pond will be completed by July 30, 2006." The Permittee must receive prior approval from NMED and OCD before routing the storm sewer water to the proposed pond. The Permittee will not be authorized to bypass the refinery wastewater treatment system and reroute storm sewer water to the proposed pond if process wastewater and storm sewer water cannot be separated.

The report describing the results of the dye trace study, other sewer system testing and the procedures and policy to isolate contaminants from storm water must be submitted to NMED within 30 calendar days after the completion of such activities.

If you have any questions regarding this letter, please call me at (505) 428-2545.

Sincerely,



Hope Monzeglio
Project Leader
Permits Management Program

HM

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
W. Price, OCD
C. Chavez, OCD
D. Foust, OCD
S. Morris, GRCC
J. Lieb, GRCC

File: Reading file and GRCC 2006



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May 5, 2006

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

**SUBJECT: REVISED SAMPLING SCHEDULE RESULTING FROM THE AUGUST
2005 API SEPARATOR RELEASE
GIANT REFINING COMPANY, CINIZA REFINERY
EPA NO. NMD000333211
HWB-GRCC-MISC**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) is revising the sampling schedule and requirements included in NMED's letter dated February 3, 2006 titled *Revised Sampling Schedule For Aeration Lagoon Effluent*. This revision is based on analytical data provided by Giant Refining Company, Ciniza Refinery (the Permittee). The attached table, titled *Giant Ciniza Refinery Sampling Schedule Resulting from the API Separator Spill*, dated May 12, 2006 (Revision 2) lists the revised sampling frequency and locations. The frequency of effluent sampling must now be conducted on a quarterly basis. Effluent sampling is no longer required at the Old API Separator, however; monthly flow rates of fluids pumped from the Old API Separator to the New API Separator must be recorded. The attached table shall replace the Table, Revision 1 dated February 1, 2006.

Additional flow measurements must be collected at the following locations: the Pilot Station Effluent (PSE) to Aeration lagoon 1 (AL-1), effluent from the New API Separator (NAPIS) to the benzene strippers, Boiler Water effluent discharge to Evaporation Pond 2, effluent discharge from Evaporation Pond 1 to Evaporation Pond 2 (EP1 to EP-2), and effluent from Aeration

Mr. Ed Riege
Giant Ciniza Refining Company
May 5, 2006
Page 2 of 2

Lagoon 2 to Evaporation Pond 1 (AL-2 to EP-1). The flow rates shall be measured at the frequency required by the Oil Conservation Division (OCD). If OCD has not required a monitoring schedule to date, the flow rates shall be monitored on a monthly basis.

The Permittee shall submit the following information to NMED on a quarterly basis and presented as follows: in letter format reporting the results of quarterly effluent sampling, identify any Water Quality Control Commission (WQCC) Standards or Environmental Protection Agency Maximum Contamination Level (EPA MCL) exceedances. The Permittee shall provide monthly flow rates and calculated monthly flow volumes measured at the locations listed above. The Permittee shall describe how the flow rate readings were collected. The Permittee shall also provide all laboratory analytical results including quality assurance and quality control (QA/QC) data. The quarterly information shall be submitted to NMED within thirty (30) days of receipt of the associated final laboratory report. The Permittee must notify NMED verbally within three (3) calendar days if any contaminants are detected at concentrations that are determined to be characteristic hazardous waste except for the effluent discharged from the New API Separator.

If you have any questions regarding this letter, please call me at (505) 428-2545.

Sincerely,



Hope Monzeglio
Project Leader
Permits Management Program

HM

Attachment

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
W. Price, OCD
C. Chavez, OCD
D. Foust, OCD
S. Morris, GRCC
J. Lieb, GRCC
J. Sanchez, GRCC

File: Reading File and GRCC 2006

Giant Ciniza Refinery Sampling Schedule Resulting From The API Separator Spill

Sampling Location	* Sampling Frequency	Analytical Suite	Comments and Additional Parameters
Effluent from AL-2 to EP-1	Quarterly	EPA Method 8260, EPA Method 8015B must include C ₆ -C ₁₀ and C ₁₀ -C ₃₆ carbon ranges, RCRA 8 Metals (totals)	Sampling frequency will be modified as needed by NMED
Effluent from Old API separator (storm water separator effluent)	Monthly flow rate measurements to New API Separator only	Collect monthly flow rate readings from the Old API to the New API Separator.	If effluent is re-routed to the aeration lagoons or any other location other than the New API Separator, NMED must be contacted and the sampling frequency and analytical suite will be established. As long as the effluent is re-routed to the New API Separator, monthly flow rates readings must be collected.
Effluent from Pilot Gas Station to the Aeration Lagoon	Quarterly	EPA method 8260, RCRA 8 Metals (totals); EPA Method 8015B must include C ₆ -C ₁₀ and C ₁₀ -C ₃₆ carbon ranges	Sampling frequency will be modified as needed by NMED
Effluent from New API separator	Quarterly	EPA method 8260, EPA Method 8015B must include C ₆ -C ₁₀ and C ₁₀ -C ₃₆ carbon ranges	Sampling frequency will be modified as needed by NMED
<p>*Note: Monthly effluent samples from AL-2 to EP-1, the New API Separator (NAPIS), and the Pilot Gas Station (PSE) discharge must be collected on the same day and analyzed for EPA method 8260 and EPA Method 8015B (C₆-C₁₀ and C₁₀-C₃₆).</p> <p>Quarterly sampling must begin in June. All data must be submitted to NMED on a quarterly basis no later than 30 days after receipt of the final laboratory report.</p>			

Table date: Revision 2-May 12, 2006.