

Monzeglio, Hope, NMENV

From: Chavez, Carl J, EMNRD
Sent: Wednesday, May 10, 2006 4:03 PM
To: Jim Lieb; Steve Morris; Ed Riege
Cc: Cobrain, Dave, NMENV; Monzeglio, Hope, NMENV; Price, Wayne, EMNRD; Foust, Denny, EMNRD
Subject: Evaporation Pond 2 (EP2) Corrective Action Inspection 5-9-06
Attachments: OCD Ciniza Refinery EP 2 Corrective Action Inspection 5-9-06.doc

Jim, et. al.:

Good afternoon. I am writing to clarify some cleanup and non-cleanup issues that we discussed yesterday related to the corrective action at EP2 (with exception of the fence around the fire water pond).

Fence around fire water pond question: please remove the fence in order to key in the liner, if the engineering design is approved and Giant proceeds to construct the pond with leak detection sump.

Netting on ponds greater than 16 feet question: please net evaporation ponds 1 and 2, since they have not been rendered non-hazardous to wildlife including migratory birds.

Cleanup goal: please scrape contamination at least 4 inches, by 2 foot back and out of pond, all along the estimated 300 feet off shoreline (see photos). If black waste material is still present in pond, scrape down to remove all black waste from inside of pond. The estimated volume of waste for disposal is about 200 ft³ or 7.5 yd³, but probably more.

Sample location clarification: a total of 4 samples analyzed for Benzene (10 ppm), BTEX (50 ppm) and TPH (100 ppm) are required with cleanup level in parentheses). Please collect 3 samples within the scraped saturated areas INSIDE (not on the shoreline) of the pond at the NE, E and SE areas of evaporation pond 2 (EP2) . The 4th sample should be collected at the NE (location of original sampling with analytical data), but deeper into the pond to determine whether contamination is present at deeper depths or just along the east side of EP2 near shoreline. Visual observations of EP2 indicate that prevailing westerly and/or southwesterly winds have moved floating contamination to the eastern side of EP2; thus, sampling will be focused on the eastern side of the pond within saturated areas adjacent to the shoreline(see attached photos). Giant is working to meet the OCD's May 31, 2006 cleanup deadline and conditions in Wayne Price's (OCD) e-mail of April 12, 2006.

Disposal: Giant will test or classify waste before disposal, but is tentatively planning to dispose of waste at the Thoreau landfill. Waste will be stored near the old hazardous waste treatment area.

I'm working on the March 28, 2006 follow-up inspection letter and may include any May 9, 2006 inspection information as needed. Thank you for your cooperation. Please contact me if you have questions.

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(Pollution Prevention Guidance is under "Publications")

Disclaimer: Please be advised that this e-mail does not relieve Giant- Ciniza of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, Giant is not relieved of responsibility for compliance with any other federal, state, or local laws and/or regulations.

5/11/2006

**OCD Ciniza Refinery Evaporation Pond 2 Corrective Action Inspection
May 10, 2006**

Photos:



Discharge of EP1 effluent into EP2



Looking southward from NE side of EP2 along eastern shoreline. Eastern shoreline is estimated to be about 300 ft. long.



Looking southward from mid-point along east side of EP 2 shoreline at scraped waste along shoreline and workers preparing for a lunch break.



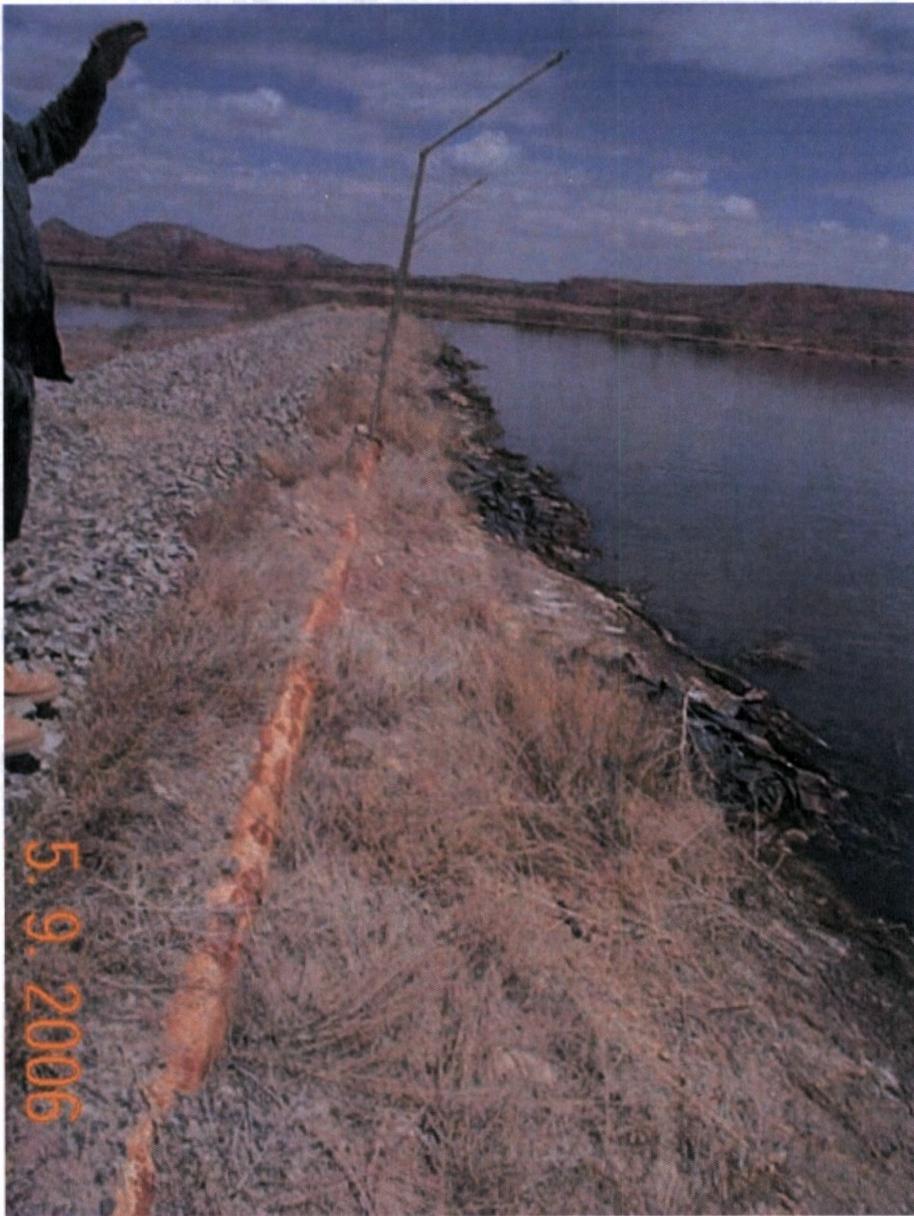
Looking westward from east side middle section of EP2. Scraped waste on shoreline in foreground. Notice clean shoreline conditions on west side of pond.



Looking northward from SE side of pond along east side of EP 2 shoreline. Eastern shoreline is estimated to be about 300 ft. long.



Contractors are digging with long scrapers by hand at least 4 inches deep from at least 2 feet inside of pond scraping waste outward over shoreline. Anticipated volume of waste expected from soil cleanup is expected to be greater than 200 ft³ or 7.4 yd³ as the shoreline will end up being scraped during the waste removal process.



Looking northward from SW of EP2 along shoreline.



Looking eastward from center west shoreline of EP2 back toward refinery.



Looking southward from NE point along EP2 shoreline. Eastern shoreline is estimated to be about 300 ft. long.