

Monzeglio, Hope, NMENV

From: Chavez, Carl J, EMNRD
Sent: Friday, August 04, 2006 3:31 PM
To: Jim Lieb; Ed Riege; Steve Morris; Johnny Sanchez
Cc: Price, Wayne, EMNRD; Powell, Brandon, EMNRD; Monzeglio, Hope, NMENV; Cobrain, Dave, NMENV
Subject: Water Treatment System Study Conference Call August 3, 2006

Jim:

Please find below OCD comments stemming from yesterday's telephone conference call related to the above subject. Giant requested to discharge non-contact water used in refinery operations into the stormwater system.

Wastewater Treatment System Study:

1) The OCD regards non-contact water that is run through refinery systems to be "process water;" therefore, the OCD cannot approve Giant's request to discharge non-contact water into the OAPIS and/or fire water pond. Giant will need to re-route non-contact water into a process drain(s) with contact water instead of a stormwater drain(s) with non-contact water. The discharge plan permit also supports this requirement.

During the conference call, the OCD and NMED discovered that non-contact water run through refinery systems has been discharging into the OAPIS, which will eventually be decommissioned. Furthermore, Giant is requesting to route non-contact water to the proposed fire water or evaporation pond, once the OAPIS is decommissioned.

2) The OCD requires that monthly phenol (total) monitoring at a minimum be implemented by Giant at influent and effluent locations to AL1 starting this month in order to begin assessing the existing treatment system efficiency under normal operation and flow conditions. The OCD and NMED have discussed this with Giant in previous meetings.

During the conference call, the OCD and NMED were informed that there would be a delay in the Refinery Treatment System Study until Giant could send the state agencies a completed engineering design plan (plan) for the study, including the number, type, location and installation of flow meters for the study and for future monitoring and assessment of the treatment system. The plan is scheduled for receipt in mid September of 2006 and the agencies anticipate completion of the study in February or March of 2006.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

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