

GRCC 06



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



RON CURRY
SECRETARY

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

September 19, 2006

Ed Riege
Giant Refining Company,
Route 3, Box 7
Gallup, New Mexico 87301

**RE: APPROVAL WITH MODIFICATIONS WORK PLAN FOR INVESTIGATION OF THE OVERFLOW DITCH AND FAN-OUT AREA OF RAILROAD RACK LAGOON, SWMU #8
GIANT REFINING COMPANY, CINIZA REFINERY
EPA ID #: NMD000333211, HWB-GRCC-06-001**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) has reviewed Giant Refining Company, Ciniza Refinery's (Permittee) *Work Plan for Investigation of Overflow Ditch and Fan-Out Area of Rail Road Rack Lagoon, SWMU #8* (Work Plan), dated August 29, 2006. NMED hereby approves the Work Plan with the following modifications. The Permittee must implement the modifications to the Work Plan described below and document them in the investigation report.

Comment 1

If the Permittee detects evidence of contamination during the investigation, the Permittee must contact NMED within one business day to determine the need for further action.

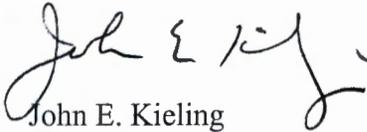
Comment 2

The Permittee must move the locations of soil boring B-3 and B-9 to the locations identified in Attachment 1 of this letter. To provide for more evenly distributed locations, sample point B-9 must be moved further north toward B-8 and sample point B-3 must be moved southwest, between B-4 and B-7.

Mr. Riege
Giant Refining Company
September 19, 2006
Page 2

The Permittee must submit the results of this investigation in an investigation report to NMED within 180 days after receipt of this letter. If you have any questions regarding this letter please contact Hope Monzeglio of my staff at (505) 428-2545.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

HM

cc: D. Cobrain, NMED HWB
H. Monzeglio, NMED HWB
C. Frischkorn, NMED HWB
W. Price, OCD
J. Lieb, GRCC
S. Morris, GRCC
R. Allen, Trihydro Corporation
File: GRCC 2006 and Reading
HWB-GRCC-06-001

Attachment 1

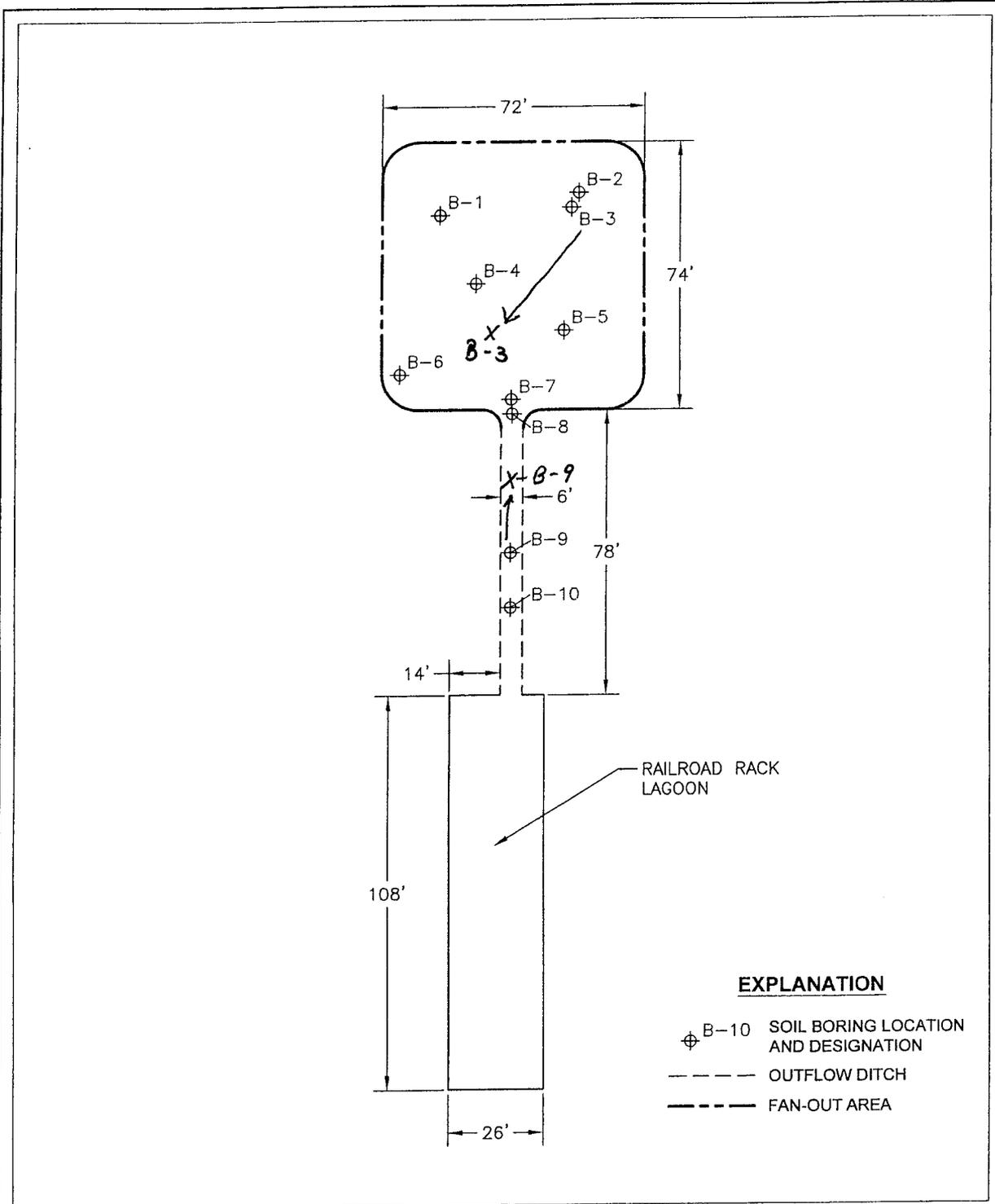


FIGURE 2

**RAILROAD RACK LAGOON
OVERFLOW DITCH AND FAN-OUT AREA**

**GIANT REFINING COMPANY
CINIZA REFINERY
GALLUP, NEW MEXICO**



Trihydro
CORPORATION
1252 Commerce Drive
Laramie, Wyoming 82070
www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729

Drawn By: REP	Checked By: RA	Scale: 1" = 40'	Date: 8/7/06	File: 072RROVERFLOW_200608
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Monzeglio, Hope, NMENV

From: Jim Lieb [jlieb@giant.com]
Sent: Friday, September 15, 2006 3:54 PM
To: Chavez, Carl J, EMNRD; Monzeglio, Hope, NMENV
Cc: Ed Riege; Ed Rios; Steve Morris
Subject: Update for week of 9-11-06
Attachments: August06.pdf

Carl and Hope:

1) As required by OCD and NMED, we sampled the aeration lagoons in August for phenol. I have attached the results. For some reason phenol was detected at a higher concentration leaving than was detected entering the aeration lagoons. I asked our waste water consultants about this and they said it could be due to one or a combination of factors:

- 1) Sampling snapshot that just happened to show higher phenol leaving while at the same time water with lower phenol concentration was entering
- 2) Degradation of organics in process water into phenol type compounds
- 3) Entrained phenol in the lagoon mud entering water
- 4) Sampler inadvertently mixed up the samples

All 5 of our aerators were operating during the sampling and nothing out of the ordinary was occurring with the system. We will sample the aeration lagoons for phenol this month and await the results to see if a similar pattern results.

2) Trihydro will be on site Monday to kick off a QQQ audit to identify applicable requirements that would pertain for storm sewer conversions to process sewers. We will identify the storm sewers that we will plan to convert to process sewers. Trihydro will also perform work to prepare a process/storm sewer comparison schematic as NMED and OCD have requested in comments to Giant. We expect to submit the comparison schematic with our other responses to NMED's and OCD's comments that are due to NMED and OCD on or before October 16, 2006.

3) We are continuing flow meter project and expect to issue purchase orders soon for the meters and for contractor to begin installation.

4) We will soon be closing potable well #1. We recently obtained approval from the New Mexico Engineer's Office to perform the well closing.

If you have any questions concerning any of these points, please contact me at (505) 722-0227.

Sincerely,

Jim Lieb
Environmental Engineer
Giant Industries, Inc.
Ciniza Refinery
I-40, Exit 39
Jamestown, NM 87347
(505) 722-0227
fax (505) 722-0210
jlieb@giant.com

9/18/2006



COVER LETTER

Friday, August 25, 2006

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

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

RE: Pond 2 Inlet & Aeration Lagoon Phenolics

Order No.: 0608225

Dear Steve Morris:

Hall Environmental Analysis Laboratory, Inc. received 3 sample(s) on 8/18/2006 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", is written over a horizontal line.

Andy Freeman, Business Manager
Nancy McDuffie, Laboratory Manager

AZ license # AZ0682
ORELAP Lab # NM100001



Hall Environmental Analysis Laboratory, Inc.

Date: 25-Aug-06

CLIENT:	Giant Refining Co	Client Sample ID:	AL-1 Inlet
Lab Order:	0608225	Collection Date:	8/17/2006 1:00:00 PM
Project:	Pond 2 Inlet & Aeration Lagoon Phenolics	Date Received:	8/18/2006
Lab ID:	0608225-02	Matrix:	AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 420.3: TOTAL PHENOLICS						Analyst: SCC
Phenolics, Total Recoverable	9.4	3.0		µg/L	1	8/25/2006

Qualifiers:	* Value exceeds Maximum Contaminant Level	B Analyte detected in the associated Method Blank
	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
	S Spike Recovery outside accepted recovery limits	

Hall Environmental Analysis Laboratory, Inc.

Date: 25-Aug-06

CLIENT:	Giant Refining Co	Client Sample ID:	AL-2 Outlet
Lab Order:	0608225	Collection Date:	8/17/2006 1:15:00 PM
Project:	Pond 2 Inlet & Aeration Lagoon Phenolics	Date Received:	8/18/2006
Lab ID:	0608225-03	Matrix:	AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 420.3: TOTAL PHENOLICS						Analyst: SCC
Phenolics, Total Recoverable	110	15		µg/L	5	8/25/2006

Qualifiers:	* Value exceeds Maximum Contaminant Level	B Analyte detected in the associated Method Blank
	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
	S Spike Recovery outside accepted recovery limits	

HALL ENVIRONMENTAL
 attn: ANDY FREEMAN
 4901 HAWKINS NE, SUITE D
 ALBUQUERQUE NM 87109-4372

Explanation of codes	
B	Analyte Detected in Method Blank
E	Result is Estimated
H	Analyzed Out of Hold Time
N	Tentatively Identified Compound
S	Subcontracted
1-9	See Footnote

STANDARD

Assagai Analytical Laboratories, Inc.

Certificate of Analysis

All samples are reported on an "as received" basis, unless otherwise noted (i.e. - Dry Weight).

Client: HALL ENVIRONMENTAL
 Project: 0608225
 Order: 0608543 HAL03 Receipt: 08-18-06

William P. Biava: President of Assagai Analytical Laboratories, Inc.

Sample: 0608225-01A POND INLET 2 Collected: 08-17-06 13:30:00 By:
 Matrix: AQUEOUS

QC Group	Run Sequence	CAS #	Analyte	Result	Units	Dilution Factor	Detection Limit	Code	Prep Date	Run Date
0608543-0001A		EPA 410.1	Chemical Oxygen Demand					By: NJL		
WC0006053	WC.2006.2080.12	C-004	Chemical Oxygen Demand	976	mg/L	1	10		08-24-06	08-24-06

Sample: 0608225-01B POND INLET 2 Collected: 08-17-06 13:30:00 By:
 Matrix: AQUEOUS

QC Group	Run Sequence	CAS #	Analyte	Result	Units	Dilution Factor	Detection Limit	Code	Prep Date	Run Date
0608543-0002A		EPA 405.1	Biochemical Oxygen Demand					By: NJL		
B0006101	WC.2006.2077.5	10-26-4	Biochemical Oxygen Demand	525	mg/L	1	2		08-18-06	08-23-06

Unless otherwise noted, all samples were received in acceptable condition and all sampling was performed by client or client representative. Sample result of ND indicates Not Detected, ie result is less than the sample specific Detection Limit. Sample specific Detection Limit is determined by multiplying the sample Dilution Factor by the listed Reporting Detection Limit. All results relate only to the items tested. Any miscellaneous workorder information or footnotes will appear below.

Analytical results are not corrected for method blank or field blank contamination.

QA/QC SUMMARY REPORT

Client: Giant Refining Co
 Project: Pond 2 Inlet & Aeration Lagoon Phenolics

Work Order: 0608225

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: E420.1									
Sample ID: MB-11109		MBLK							
Phenolics, Total Recoverable	ND	µg/L	3.0						
Sample ID: LCS-11109		LCS							
Phenolics, Total Recoverable	18.80	µg/L	3.0	94.0	51.7	133			

Batch ID: 11118 Analysis Date: 8/25/2006
 Batch ID: 11118 Analysis Date: 8/25/2006

Qualifiers:

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

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name GIANTREFIN

Date and Time Received:

8/18/2006

Work Order Number 0608225

Received by AT

Checklist completed by

[Signature]
Signature

8/18/06
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? 3° 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 - Cimiza*
 Address: *Route 3 Box 7 Gallup, NM 87301*

Project Name: *Pond 2 inlet and Aeration Lagoon Phenolics*

Project #: *8-17-2006*

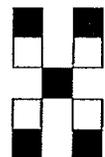
Project Manager: *Steve Morris*

Phone #: *505 722 3833*

Sampler: *Steve Morris*

Fax #: *505 722 0210*

Sample Temperature: *3rd*



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)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F, Cl, NO ₂ , NO ₃ , PO ₄ , SO ₄)	8081 Pesticides / PCB's (8082)	8260B (VOA)	8270 (Semi-VOA)	BOD	COD	420.3 Phenolics	Air Bubbles or Headspace (Y or N)	
					HgCl ₂	HNO ₃																		
<i>8/17/06</i>	<i>1330</i>	<i>H₂O</i>	<i>Pond 2 inlet</i>	<i>2</i>			<i>165225-1</i>														<i>X</i>	<i>X</i>		
<i>"</i>	<i>1300</i>	<i>"</i>	<i>AL-1 inlet</i>	<i>1</i>			<i>-2</i>															<i>X</i>		
<i>"</i>	<i>1315</i>	<i>"</i>	<i>AL-2 Outlet</i>	<i>1</i>			<i>-3</i>															<i>X</i>		

Date: *8/18/06* Time: *0950* Relinquished By: (Signature) *[Signature]*

Received By: (Signature) *[Signature]*

Remarks: *RUSH*

Date: _____ Time: _____ Relinquished By: (Signature) _____

Received By: (Signature) _____

8/18/06 0950