

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, October 20, 2006 5:09 PM
To: 'Jim Lieb'; Steve Morris
Cc: Price, Wayne, EMNRD; Powell, Brandon, EMNRD; Monzeglio, Hope, NMENV; Cobrain, Dave, NMENV
Subject: Some follow-up items from OCD's October 11, 2006 site inspection

Jim and Steve:

I am writing to follow-up with you on some issues from the OCD's October 11, 2006, fire inspection. The inspection was precipitated by an alkylation unit fire on October 5, 2006, and resulted in a comprehensive refinery inspection with discussion of past inspection items. The refinery inspection also facilitated the introduction of two new OCD Inspectors, Mr. Leonard Lowe and Mr. Ed Hansen. This e-mail serves to follow-up on some items from our meeting and to update you on what will be forthcoming.

I am in the process of completing a OCD fire investigation document pertaining to the Alkylation Unit fire. It will contain observations, recommendations and some requirements (i.e.; sampling for chlorides, fluorides and pH at a couple of locations) based on our inspection. It is interesting to note that some stormwater drainage changes have been made by Giant, since our inspection of September 8, 2005, i.e.; Giant appears to have decommissioned outfall #2 replacing it with a series of drainage blocks in the vicinity of the railroad lagoon area, which Giant indicated it had submitted a stormwater drainage map to the EPA in its most recent Stormwater Pollution Prevention Plan (SWPPP) and had yet to be contacted by the EPA. The OCD is concerned about natural rainfall events and the potential for overflow at the process area. Is this likely and especially if Giant combines stormwater with its process water drains. For example, the overflow from the refinery process area (cement curbing) during the fire ran over into a stormwater drainage area that is contained by a berm. Any contamination in the stormwater area could present a point source of contamination.

Secondly, there were some follow-up items to previous refinery inspections that were discussed. I am working on more comprehensive write-up of our inspection. The OCD and NMED will be discussing the NAPI Unit on Thursday, November 2, 2006 around 11:30 a.m. and may contact you if we have questions. I think we need to know the maximum flow capacity of the NAPI system. It seems like Giant is moving forward with tank placement, etc., in lieu of the previously proposed fire water pond in advance of engineering plans, submittals, etc. The issues associated with the NAPI Unit may affect Giant's plans.

Regarding the proposal to bypass AL2 during the installation of a flow meter device, flow from AL1 to EP1 may be approvable if the 3 aerators are fully functional in AL1, and you can provide us with a reasonable time-frame (ex., 1/2 day); and provided there are no other plant treatment system upsets or issues that have yet to be discussed.

Please contact me if you have questions. Thanks.

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(Pollution Prevention Guidance is under "Publications")