

GRC07

NEW MEXICO
ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 15, 2007

Mr. Ed Riege
Environmental Superintendent
Giant Refining Company
Route 3, Box 7

Mr. Jim Lieb
Environmental Engineer
Giant Refining Company
Route 3, Box 7

**RE: APPROVAL WITH DIRECTION
SUBSURFACE INVESTIGATION WORK PLAN NEAR TANK 101 AND 102
GIANT REFINING COMPANY, CINIZA REFINERY
EPA ID No. NMD048918817
HWB-GRCC-07-003**

Dear Messrs. Riege and Lieb:

The New Mexico Environment Department (NMED) has completed its review of the Giant Refining Company, Cinza Refinery's (Permittee) *Work Plan for Subsurface Investigation near Tanks 101 and 102* (Work Plan) dated August 6, 2007. NMED hereby approves this Work Plan with the following conditions.

Comment 1

The Permittee discusses the EM-31 survey on pages two and three of the Work Plan and states "[t]he survey area will be divided into a bi-directional grid with a grid spacing of approximately 30 feet."

Based on the known subsurface conditions at the refinery, NMED believes a 30 foot grid spacing is too wide to provide adequate coverage to detect zones of saturation. NMED recommends using a 15 foot grid spacing to survey for water bearing zones.

Mr. Ed Riege
Giant Ciniza Refining Company
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Comment 2

The Permittee states on page three (Soil Characterization) "Laboratory analyses will be conducted on soil samples to show whether or not the soil contamination is seep-related. The analyses performed will be dependent on the results of the analyses performed on the fluid samples collected from the seeps."

This section neither provides locations or depths at which soil samples will be collected if contamination is detected, nor the number of samples to be collected. Due to the presence of relatively coarse grained lenses and stringers in the clay underlying the facility, contamination is most likely present in zones surrounded by non-contaminated soils. If contamination is detected, a sample must be collected above, below, and within the zone to help determine the vertical extent of contamination and identify the type of contaminants. For screening purposes and to identify the general type of contamination, the Permittee should submit soil samples for analysis to oil range organics using EPA Method 8015 to test for both light and heavier hydrocarbons.

Comment 3

From the description of the Phase I investigation and Figure 1, it appears that no investigation activities will be conducted east of Tanks 101 and 102. It is possible that sources of contamination could be upgradient from the tank farm east of Tanks 101 and 102. The Permittee must propose sampling east of tanks 101 and 102 for NMED approval.

Comment 4

It is NMED's understanding that the scope of a second phase of investigation will be determined from the results of this initial investigation and that the Permittee will provide NMED with the scope of the Phase II investigation prior to implementation. The Permittee must notify NMED if this has been misinterpreted.

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Giant Ciniza Refining Company
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A response to Comment three should be submitted in a timely manner to allow NMED sufficient time to review the proposed work. The scope of work must be approved by NMED prior to implementation.

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

cc: D. Cobrain, NMED HWB
C. Frischkorn, NMED HWB
H. Monzeglio, NMED HWB
W. Price, OCD
S. Morris, GRCC
File: Reading File and GRCC 2007
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