

**Monzeglio, Hope, NMENV**

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**From:** Jim Lieb [jlieb@giant.com]  
**Sent:** Thursday, August 23, 2007 10:19 AM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Monzeglio, Hope, NMENV; Powell, Brandon, EMNRD; Cobrain, Dave, NMENV; Ed Rios; Ed Riege; Mickey D'Souza; Steve Morris; Cheryl Johnson; Don Riley; William Chojnacky; Joel Quinones; Loren Pritzel; Ann Allen  
**Subject:** RE: Diesel oil Release at Tank 583 on 8-21-07, email followup to verbal notification  
**Importance:** High

Carl:

We will obtain discrete samples in the area of release. We do not believe that the oil release extends under Tank 583 because the tank is equipped with a primary plastic liner which was installed under the tank floor in 1997.

The tank was recently taken out of service for a routine API 653 internal and external inspection. On completion of our visual and intensive non-destructive testing methods that included: settlement of tank, ultrasonic thickness survey of shell, roof, floor and all nozzles, 100% vacuum box testing of all floor welds, wet florescent magnetic particle testing on all vertical weld seams and nozzle connection welds and 18" on all three sides of "T" junctions of the first course shell, MFE testing of the floor plates, diesel-overnight testing of corner/chime weld. All weld repairs were performed by qualified welders/specification and procedures meeting and exceeding API-653 requirements.

The cause of the failure of the floor is unknown at this time. We have emptied the tank; thereafter we will open, gas free, prepare for entry for confined space, clean the entire floor and investigate the leak visually/ with the help of various non destructive testing methods. Once the source of the leak is detected a root cause failure analysis will be performed by a third party metallurgical laboratory. All repairs will then be performed to API-653 and Good Engineering Standards used by the Industry.

I may have misstated in my previous email that the tank was reconstructed because in discussing the tank with our Inspection Department no major repairs were performed on Tank 583. We did however remove the internal floating roof from this tank, but that would in no way effect the mechanical integrity. We visually saw the leaks from the concrete ring wall below the tank and situated above the liner and noticed that the diesel was clean with no signs of soil/sand contamination. A sample of the product will be sent to an independent fuels laboratory in Albuquerque for purity analysis which we believe will show no contact with soils beneath the tank. This should show that the primary liner under the tank is in god condition and has prevented soil impacts beneath the tank.

We will take pictures of excavated areas and analyze soil samples for BTEX, DRO extended and GRO. We will also provide you with the reason for the tank failure after we have completed the root cause analysis.

If you have any questions, please contact me.

Regards,  
Jim Lieb  
Environmental Engineer  
Western (Giant) Refining, Inc.  
Gallup Refinery  
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**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Tuesday, August 21, 2007 4:13 PM

9/20/2007

**To:** Jim Lieb; Monzeglio, Hope, NMENV; Powell, Brandon, EMNRD; Cobrain, Dave, NMENV; Price, Wayne, EMNRD  
**Cc:** Ed Rios; Ed Riege; Steve Morris; Cheryl Johnson; Don Riley; William Chojnacky; Joel Quinones; Mickey D'Souza; Loren Pritzel; Ann Allen  
**Subject:** RE: Diesel oil Release at Tank 583 on 8-21-07, email followup to verbal notification

Jim:

The OCD requires discrete sampling to verify that diesel fuel impacted soils were cleaned up at depth below the reconstructed tank and within the bermed area. See OCD spill cleanup guidelines at [http://www.emnrd.state.nm.us/ocd/documents/7C\\_spill1.pdf](http://www.emnrd.state.nm.us/ocd/documents/7C_spill1.pdf).

Provide photos of the base of the excavation and confirmation samples from the base of the excavation analyzing for BTEX, DRO extended and GRO. A description of the Tank 583 reconstruction, the problem with the reconstructed tank resulting in the release and what Giant will do to fix the tank problem would be appreciated. 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  
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Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

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**From:** Jim Lieb [mailto:jl Lieb@giant.com]  
**Sent:** Tuesday, August 21, 2007 3:03 PM  
**To:** Monzeglio, Hope, NMENV; Chavez, Carl J, EMNRD; Powell, Brandon, EMNRD; Cobrain, Dave, NMENV  
**Cc:** Ed Rios; Ed Riege; Steve Morris; Cheryl Johnson; Don Riley; William Chojnacky; Joel Quinones; Mickey D'Souza; Loren Pritzel; Ann Allen  
**Subject:** Diesel oil Release at Tank 583 on 8-21-07, email followup to verbal notification

Carl, Hope, and Brandon:

We experienced a release of diesel oil from Tank 583 early this morning (2 AM). Tank 583 was reconstructed and was being put back into service when the release occurred. The tank was being filled with the diesel oil when it was observed that diesel oil was leaking from the base of the tank. The filling operation was immediately stopped. The tank has been filled partially with water to float remaining oil above the bottom.

We estimate that 450 gallons of diesel oil was released. It was all contained inside the dike/berm surrounding the tank with no release to outside property or sensitive environmental areas. A vacuum truck was dispatched to the tank to vac up the free liquid. We estimate that as of this morning 220 gallons were recovered and an additional 100 gallons this afternoon. I just got back from the tank - the vac truck was still down there vacuuming up the remaining liquid.

There is some soil impact inside the berm near the tank. We will remove the soil and take it over to our soil staging area. It will be placed on plastic sheeting in a bermed area set up for it. We will sample it for analysis and decide how to handle it when results are obtained.

I have attached the OCD Form C-141 for this release. If you have any questions, please contact me at below.

Regards,  
Jim Lieb  
Environmental Engineer  
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9/20/2007

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