

Gree

~~9/16/08~~ 9/16/08



ROUTE 3 BOX 7
GALLUP
NEW MEXICO 87301

PHONE
505-722-3833
INTERNET
WWW.GIANT.COM

October 24, 2007
(Revision/Correction October 25, 2007)

Certified Mail # 7007 0220 0001 6547 2173

Mr. Craig Lutz (6EN-HS)
Environmental Engineer
EPA Region 6
1445 Ross Ave.
Suite 1200
Dallas, TX 75202

**Re: Giant Gallup, New Mexico Refinery/EPA RCRA Inspection
Initial Giant Response and Follow-up Submission**

Dear Mr. Lutz:

This letter is in response to the RCRA inspection your team performed at Giant's Gallup, New Mexico refinery (the "refinery") on September 11-13, 2007. This response and follow-up is designed to respond to and clarify some of the preliminary observations set forth in the close-out meeting and, where appropriate, to set forth efforts by Giant to correct matters noted during the inspection. In addition, Giant requests the opportunity to meet with EPA in advance of any formal enforcement action to explore avenues of resolving any outstanding issues at the earliest possible point and facilitate the adoption of a framework that will expedite a final settlement.

I. Recovered Oil Tanks

In the close-out meeting, your team and Giant discussed the material in the recovered oil tanks. This material was removed from our lagoons and ponds and is currently being recycled at Norco. As we discussed in the close-out meeting Giant sampled the bottom material from these tanks on September 17, 2007. The results can be found in Attachment 1.¹ In lieu of handling this material as hazardous waste, Giant proposes to undertake the following actions by the end of 2007: Giant will completely remove this material from the recovered oil tanks such that those tanks will qualify as RCRA "empty." Giant will centrifuge the removed materials on-site and will recover the oil from this process. The oil will be reinserted into the refining process on-site or sold to a third-party. The resulting waters will be processed in the on-site wastewater treatment and resulting solids will be sent off-site to Norco for recycling. Giant requests EPA concurrence on this approach.

¹EPA Method 8260B/1331 results indicate benzene at 21 ppm.

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II. Bundle Cleaning Pad

A. Open Drums of Sludge at Bundle Pad

A few drums were noticed on the bundle cleaning pad without lids and labelling. Two Giant employees were working these drums and had just left the pad to take several drums to the 90-day area. They wanted to clear the area of these drums so they could finish filling, covering, cleaning and labelling the drums in question. The two employees were gone less than 10 minutes and when they returned a refinery environmental engineer asked the employees with their forklift to leave the area so the EPA inspection that day could be completed.

After the inspection group left the area, Giant employees finished filling these drums, placed lids on the open drums, and labelled them with Hazardous Waste labels. All of these drums were then placed on pallets and moved to the 90 day storage area.

To improve upon the current procedures in place, Giant has developed an updated environmental procedure "E-8, Drum Management Procedure" (*See Attachment 2*) to reflect changes made at the refinery to better ensure environmental compliance. Training has been provided to those individuals responsible for the appropriate management of drums and the sign-in sheet from that training is attached as Attachment 3.

B. ASO Soil on Pad

ASO contaminated soil had been sampled in the past and was non-hazardous (*See Attachment 4*); a copy was provided to you during the inspection. Based on this analysis of material generated in the same manner as the material on-site the day of the inspection, Giant considered this material to be non-hazardous. This pile of soil was sampled on September 19, 2007 and analysis (*See Attachment 5*) confirmed it was also non-hazardous.

C. Heat Exchanger on Top of ASO Soil

Giant agrees that waste segregation practices at the refinery can be improved. In this case since the heat exchanger was placed on top of the non-hazardous ASO soil pile the whole pile was drummed and sent offsite for hazardous waste disposal. An environmental procedure has been written to specifically address the handling of heat exchangers (*See Attachment 6*). Employees have been recently trained on applicable procedures and the sign-in sheet from that training is attached as Attachment 3.

D. Charcoal Filter Material

Torn super-sacks of charcoal filter material were found on bundle cleaning pad. EPA inspectors inquired about (i) the point at which waste determination is conducted on this material and (ii) the method of containerizing this material. Giant will ensure that all future sampling for waste determination is conducted while the waste is being removed from process. Additionally, this material (*See* Attachment 7) was containerized and labelled and is scheduled for shipment offsite for regeneration after receipt of pending waste analyses.

III. Twenty Times Rule

Sometimes Giant has used total analysis testing in waste determination believing doing so was legitimate process knowledge. Giant accepts your recommendation and is now using TCLP for all waste determinations.² Giant plans to recharacterize those wastes still being managed on-site using TCLP and will revise applicable paperwork to reflect the TCLP results. Additionally, Giant will revise its waste analysis plan to reflect that the TCLP will be used in waste determinations.

IV. Vacuum Truck Leakage

During the inspection a vacuum truck was found leaking water onto the ground surface from the front valve and the rear valve was leaking onto the concrete containment to drain. During the inspection a containment bucket was placed under the front valve and both valves were capped. The rear valve has been replaced. Soil staining was also found around the outside of the drain pad. This soil was sampled and analysis (*See* Attachment 8), indicate it is non-hazardous.

Giant agrees that this area could be improved and has designed a curbed concrete containment pad that will fully contain a vacuum truck with side room to accommodate any drain splash to protect surrounding soils. The anticipated completion date for this work is on or before March 15, 2008.

V. Leakage From New API Separator

The installation of a stainless steel liner inside one bay of the API separator has recently been installed and is undergoing leak tests. It is anticipated that the repaired bay will go into service within thirty (30) days. At that time the other bay will be taken out of service for the liner installation and there will no longer be any leakage from the separator. (Note that leakage from this unit is explicitly covered in a Site Specific Condition of Discharge Permit GW-032 issued by the Oil Conservation Division ("OCD") on August 23, 2007.)

² *See* undated letter from Michael Shapiro, Principal Deputy Assistant Administrator of U.S. EPA to the Hon. Charlie Norwood, U.S. House of Representatives confirming that the calculational screen (*a/k/a* the twenty times rule) is one type of generator knowledge that can be used to show that waste is not hazardous for toxicity.

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See also the discussion of RCRA permitting issues relevant to this unit in the Section VIII of this letter entitled "Status of Refinery Wastewater Treatment System Under RCRA."

VI. Wastewater Aeration Lagoons

The refinery has just completed the installation of a third benzene stripper and anticipates the start-up of that new stripper by November 9, 2007. This stripper has been installed close to the process units and it is estimated that it will remove up to 60% of the benzene load reporting to the separator/existing strippers. Weekly sampling (before and after existing strippers) is being conducted to determine the actual reduction and will be forwarded to you upon receipt.

During the inspection the EPA noted apparent API separator overflow to aeration lagoon #1. The refinery plans to install pumps with capability to pump the entire API effluent to the benzene strippers with anticipated installation date by March 15, 2008.

See also the discussion of RCRA permitting issues relevant to these units in the section of this letter entitled, "Status of Refinery Wastewater Treatment System Under RCRA."

VII. Dewatering at Bundle Pad Area

The refinery will no longer dewater wastes on the bundle cleaning pad. The refinery will be managing all future sludges and slurries in a phase separator roll-off box or similar equipment meeting the definition of a container. This box will then become a 90 day storage unit that can be swapped out at least every 90 days.³

VIII. Status of Refinery Wastewater Treatment System Under RCRA

During the close-out session a question was raised regarding the RCRA permit status of the refinery's wastewater treatment system. Following is a discussion of the RCRA regulatory program as it has related to a wastewater treatment system like that at the Gallup refinery and an analysis of the status of the Gallup system in the context of that program.

On November 17, 1980, EPA promulgated a rule providing that, if a facility was already treating hazardous wastewaters in tank systems subject to the federal Clean Water Act ("CWA") discharge permit program, that facility's hazardous wastewater treatment would not be subject to the RCRA permit program for treating those wastewaters. (See 45 Fed. Reg. 76074; codified at 40 CFR §§260.10, 264.1(g)(6), and 265.1(c)(10).) Over the years, EPA has continued to confirm that such CWA treatment keeps eligible tank-based wastewater treatment unit ("WWTU") systems outside of RCRA treatment permitting.

³ We note that EPA, in an August 23, 1985 memorandum from John H. Skinner, Director, observed that proper dewatering is a desirable waste minimization activity.

Although we believe that the Gallup wastewater system had been operating to provide the type of primary and secondary treatment contemplated by the CWA and Part 419, Giant nevertheless included benzene decharacterization as a possible RCRA-regulated treatment activity in its March 6, 1995 RCRA permit application. When operating properly, the benzene stripper tank system was intended to "treat" D018 wastewater by removing the benzene characteristic.

Giant, therefore, initially believed that it required authorization to treat D018 wastewater either with a TSD permit or pursuant to another option recognized in 270.1(c)(2), such as WWTU treatment. In 1995, however, the Hazardous and Radioactive Materials Bureau of NMED, the agency with primacy over the RCRA TSD permit program, expressly determined that the Gallup refinery benzene decharacterization WWTU was not required to submit a RCRA TSD treatment permit application, as the benzene strippers fit within the CWA WWTU program. (See Attachment 9.) In a subsequent letter (the first page of which is attached as Attachment 10⁴) NMED made a determination that the zero discharge tank-based decharacterization WWTU system was outside of RCRA treatment permit jurisdiction. This determination was affirmed again in 2000, when NMED issued the RCRA post-closure permit for the facility.⁵

As noted during the inspection, Giant has been having problems with operation of the WWTU decharacterization system. Repairs to the WWTU tank (oil water separator) are underway at present. In addition, more benzene stripper capacity is needed and will be installed. Giant has been working with NMED staff to effectuate NMED-approved correction of those problems. Aside from bringing the WWTU system to full and proper operation, consistent with the NMED regulations, Giant also will be remediating releases due to leaks in its tank system (being repaired) or problems with its benzene strippers.

WWTU tank-based decharacterization is also the method for LDR compliance at the Gallup refinery, when operating properly. The intent of the 1996 Land Disposal Program Flexibility Act, as reflected in Part 268 regulatory provisions, is to recognize the propriety of centralized wastewater treatment systems that were engaged in CWA-type primary (oil/water separator) and secondary treatment (aggressive biological treatment lagoons). When the LDRs were finalized in the 1990s, 40 C.F.R. 268.1(c) (4) (iii & iv) reflected the determinations in the 1996 Land Disposal Program Flexibility Act that zero discharge facilities that remove the benzene

⁴ Only the first page was available in Giant's files.

⁵ Also we note that By August 23, 2007 letter, the EMNRD's OCD approved Discharge Permit GW-032 for the refinery. The Discharge Permit is a CWA NPDES-like permit; it establishes effluent limits and discharges not authorized by the Discharge Permit are explicitly prohibited. The Discharge Permit explicitly covers the aeration lagoons and evaporation ponds associated with the WWTU system, and contains conditions associated with operation of those lagoons and ponds. However, the Discharge Permit does not authorize any refinery process water discharge from those units. Consequently, the Discharge Permit represents a zero discharge permit for the aeration lagoons and evaporation ponds. Giant believes that the Discharge Permit conditions and the authorities under which the Discharge Permit are issue represent the appropriate legal mechanism for regulation of the WWTU system.

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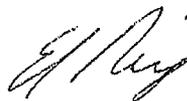
characteristic in a WWTU-tank system should be considered compliant with the LDR program, even if decharacterized wastewater later is placed in an impoundment (for secondary or tertiary treatment). So long as the tank-based WWTU achieves decharacterization prior to further treatment in impoundments, LDR compliance is achieved, allowing the continued use of centralized wastewater treatment impoundments with aggressive biological treatment or tertiary evaporative treatment.

IX. Conclusion

The preceding discussion has been provided on knowledge, information, and belief in the interest of cooperating with EPA's review of the relevant issues and to facilitate a resolution of these matters. Nothing herein should be construed as an admission of liability, and Giant reserves all applicable rights and defenses.

Please contact me if you have any questions regarding this report. We look forward to the opportunity to meet with you in the near future and work with you toward a satisfactory conclusion of these matters.

Sincerely,



Ed Riege

Environmental Superintendent

Attachment 1



COVER LETTER

Friday, October 19, 2007

Jim Lieb
Giant Refining Company
Rt. 3 Box 7
Gallup, NM 87301

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

RE: Recovered Oil Tanks

Order No.: 0709274

Dear Jim Lieb:

Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 9/20/2007 for the analyses presented in the following report.

This report is an addendum to the report dated 10/5/2007.

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



Hall Environmental Analysis Laboratory, Inc.

Date: 19-Oct-07

CLIENT: Giant Refining Company
 Lab Order: 0709274
 Project: Recovered Oil Tanks
 Lab ID: 0709274-01

Client Sample ID: Recovered Oil Sludge
 Collection Date: 9/17/2007 2:00:00 PM
 Date Received: 9/20/2007
 Matrix: SLUDGE

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
Analyst: LMM						
VOLATILES BY 8260B/1311						
Benzene	21	0.50		mg/L	1	10/4/2007 9:43:24 AM
2-Butanone	ND	10		mg/L	1	10/4/2007 9:43:24 AM
Carbon Tetrachloride	ND	0.50		mg/L	1	10/4/2007 9:43:24 AM
Chlorobenzene	ND	100		mg/L	1	10/4/2007 9:43:24 AM
Chloroform	ND	6.0		mg/L	1	10/4/2007 9:43:24 AM
1,4-Dichlorobenzene	ND	7.5		mg/L	1	10/4/2007 9:43:24 AM
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	10/4/2007 9:43:24 AM
1,1-Dichloroethene	ND	0.70		mg/L	1	10/4/2007 9:43:24 AM
Hexachlorobutadiene	ND	0.50		mg/L	1	10/4/2007 9:43:24 AM
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	10/4/2007 9:43:24 AM
Trichloroethene (TCE)	ND	0.50		mg/L	1	10/4/2007 9:43:24 AM
Vinyl chloride	ND	0.20		mg/L	1	10/4/2007 9:43:24 AM
Surr: 1,2-Dichloroethane-d4	102	69.9-130		%REC	1	10/4/2007 9:43:24 AM
Surr: 4-Bromofluorobenzene	101	71.2-123		%REC	1	10/4/2007 9:43:24 AM
Surr: Dibromofluoromethane	89.4	73.9-134		%REC	1	10/4/2007 9:43:24 AM
Surr: Toluene-d8	101	81.9-122		%REC	1	10/4/2007 9:43:24 AM

Qualifiers: * Value exceeds Maximum Contaminant Level
 E Value above quantitation range
 J Analyte detected below quantitation limits
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 RL Reporting Limit

Date: 19-Oct-07

Hall Environmental Analysis Laboratory, Inc.

QA/QC SUMMARY REPORT

Client: Giant Refining Company
Project: Recovered Oil Tanks

Work Order: 0709274

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
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Method: Volatiles by 8260B/1311

Sample ID: MBLK-13972

MBLK

Batch ID: 13972 Analysis Date: 10/4/2007 8:31:46 AM

Benzene	ND	mg/L	0.50						
2-Butanone	ND	mg/L	10						
Carbon Tetrachloride	ND	mg/L	0.50						
Chlorobenzene	ND	mg/L	100						
Chloroform	ND	mg/L	6.0						
1,4-Dichlorobenzene	ND	mg/L	7.5						
1,2-Dichloroethane (EDC)	ND	mg/L	0.50						
1,1-Dichloroethene	ND	mg/L	0.70						
Hexachlorobutadiene	ND	mg/L	0.50						
Tetrachloroethane (PCE)	ND	mg/L	0.70						
Trichloroethene (TCE)	ND	mg/L	0.50						
Vinyl chloride	ND	mg/L	0.20						

Sample ID: LCS-13972

LCS

Batch ID: 13972 Analysis Date: 10/4/2007 9:07:35 AM

Benzene	382.9	mg/L	0.50	95.7	51.1	171			
Chlorobenzene	332.8	mg/L	100	83.2	36.1	191			
1,1-Dichloroethene	406.6	mg/L	0.70	102	49.1	162			
Trichloroethene (TCE)	375.6	mg/L	0.50	93.9	41.2	166			

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 Spike recovery outside accepted recovery limits

Attachment 2

**ENVIRONMENTAL PROCEDURE E-8
Drum Handling Procedure**

PURPOSE:

The purpose of this Environmental Procedure (EP) is to ensure the proper handling and communication of drum management inside the confines of the refinery. Drums must be handled in accordance with regulatory requirements with regards to the type of drums used, proper labeling of drums, inter-plant movements, and disposal. Communication regarding drums and drum management by contractors and/or plant employees is essential to the success of a project involving drum containers.

SCOPE:

This procedure applies to the appropriate management of drums at the Gallup Refinery.

RESPONSIBILITY:

- All personnel, including contractors, are required to follow this procedure when generating sludge/solids/sediments and managing those materials in drums at the Gallup Refinery.
- The Maintenance Department or designee is responsible for providing assistance with equipment and manpower, as required, any waste. It is also the responsibility of the Maintenance Department or designee to communicate the potential generation of waste from a project or event prior to work commencement.
- The Environmental Department is responsible for assisting with identification or labeling any waste. Waste labels are kept at the environmental office or may be obtained from the warehouse with guidance from the Environmental Dept.

EQUIPMENT, TOOLS USED:

- Three-ringed open top DOT approved drum(s)
- Wrenches (15/16" Socket)
- Forklift

MATERIALS USED:

- Open top 55-gallon drums, in good condition
- Drum labels
- Pallet(s)

Approved/Recertified E. Riege	Effective 10/08/07	Supercedes 10/31/05	Revision # 2	Page 1 of 3
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ENVIRONMENTAL CONSIDERATIONS:

- This procedure is based upon EPA and DOT regulations. Failure to comply could result in violations from NMED, US EPA, and/or DOT.

COST CONSIDERATIONS:

- Avoidance of fines for failure to follow EPA and DOT regulations.
- Reduce costs for hazardous waste disposal by minimizing solid/sludges from going to the sewer.

REFERENCES:

40 CFR 262.30 thru 32 and 262.34
49 CFR 173.24

PROCEDURE/WORK INSTRUCTIONS:

WHEN REQUESTING DRUMS FOR CONTAINERIZING WASTE:

Communicate the need for a drum(s) to the Environmental Representative. Information the Environmental Representative will need includes the following:

- How many drums are required for the project?
- What is the equipment number and the material type to be placed in the drum(s)?
- What is the quantity of material to be generated?

If hazardous waste will be generated or the project is non-routine, communicate the project to the Environmental Dept., develop a plan, and review with the responsible party for implementation of the plan. Ensure that labeling of the drum(s) occurs prior to filling of the waste.

Provide the appropriate number of containers for the project. A plastic liner is required for all drums which will contain solids, sludges and/or liquids.

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FOR DRUMS CONTAINING WASTE:

For a drum that contains a hazardous or non-hazardous waste, special care should be taken before, during, and after the drum is filled. Utilize good work practices and take precautions to keep the outside of the container clean during work activities.

The person(s) generating the waste should:

- Make certain ALL drums used are DOT-approved prior to filling. Drums must be requested per Section 1 of this EP. (DOT -approved drums have three rings around the circumference of the drum as opposed to two-ringed drums. Two-ringed drums are not acceptable for containerizing waste.)
- Ensure a liner is placed in the drum prior to filling. Ensure the liner is folded over the outside of the drum, to the extent possible, to prevent material from covering the outside of the drum.
- Label the container prior to filling. Identify where the waste came from. Any waste label should contain the following information; the date, waste code (if applicable), and description of the material with a Sharpie or permanent marker.
- Secure the drum immediately upon filling (approximately 80 to 90%). The ring shall be oriented downward and tightened sufficiently to prevent a release in the event the drum should tip over. NOTE: The lid shall be closed at all times unless filling or removing material into or out of the drum
- Arrangements should then be made to have the drum(s) taken to the 90-day storage area as soon as practicable, not to exceed 72 hours.

Upon completion of filling, contact the Maintenance Dept. Representative to have the drum(s) moved to the appropriate location delegated by the Environmental Representative.

FOR EMPTY DRUMS (i.e. catalysts, chemicals, etc.):

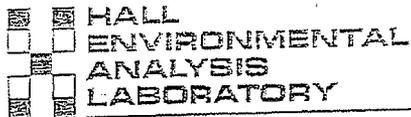
When a drum is empty and is to be removed from a unit, the person generating the drum should:

- Ensure the drum is empty. For a drum to be considered empty, all of the material possible must be removed using normal procedures and less than one inch of material is remaining in the drum.
- Replace the bungs or lids (with ring and bolt) on the drum.
Place an "EMPTY" label on the drum. These labels are located in the Warehouse.
Contact the appropriate Maintenance Foreman to have the drum removed. The Maintenance Department will schedule empty drum movements and take them to an area designated by the Environmental Department. Please contact your Environmental Representative when more "EMPTY" labels are needed.
- Place the empty drum near the roadway.

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Attachment 3

Attachment 4



COVER LETTER

Wednesday, May 30, 2007

Cheryl Johnson
Giant Refining Co
Rt. 3 Box 7
Gallup, NM 87301
TEL: (505) 722-3833
FAX (505) 722-0210
RE: Soil Samples

Order No.: 0705139

Dear Cheryl Johnson:

Hall Environmental Analysis Laboratory, Inc. received 6 sample(s) on 5/10/2007 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,

Andy Freeman, Business Manager
Nancy McDuffie, Laboratory Manager

NM Lab # NM9425
AZ license # AZ0682
ORELAP Lab # NM100001



Hall Environmental Analysis Laboratory, Inc.

Date: 30-May-07

CLIENT: Giant Refining Co
Project: Soil Samples
Lab Order: 0705139

CASE NARRATIVE

"S" flags denote that the surrogate was not recoverable due to sample dilution or matrix interferences.

Hall Environmental Analysis Laboratory, Inc.

Date: 30-May-07

CLIENT: Giant Refining Co
 Lab Order: 0705139
 Project: Soil Samples
 Lab ID: 0705139-02

Client Sample ID: ASO Soil
 Collection Date: 5/8/2007 11:06:00 AM
 Date Received: 5/10/2007
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 7471: MERCURY						
Mercury	ND	0.31		mg/Kg	5	5/29/2007
EPA METHOD 6010B: SOIL METALS						
Arsenic	ND	2.5		mg/Kg	1	5/24/2007 10:49:35 AM
Barium	350	1.0		mg/Kg	10	5/24/2007 11:21:41 AM
Cadmium	0.12	0.10		mg/Kg	1	5/24/2007 10:49:35 AM
Chromium	22	0.30		mg/Kg	1	5/24/2007 10:49:35 AM
Lead	20	0.25		mg/Kg	1	5/24/2007 10:49:35 AM
Selenium	ND	2.5		mg/Kg	1	5/24/2007 10:49:35 AM
Silver	ND	0.25		mg/Kg	1	5/24/2007 10:49:35 AM
EPA METHOD 8270C: SEMIVOLATILES						
Acenaphthene	ND	10		mg/Kg	10	5/21/2007
Acenaphthylene	ND	10		mg/Kg	10	5/21/2007
Aniline	ND	10		mg/Kg	10	5/21/2007
Anthracene	ND	10		mg/Kg	10	5/21/2007
Azobenzene	ND	10		mg/Kg	10	5/21/2007
Benz(a)anthracene	ND	13		mg/Kg	10	5/21/2007
Benzo(a)pyrene	ND	10		mg/Kg	10	5/21/2007
Benzo(b)fluoranthene	ND	10		mg/Kg	10	5/21/2007
Benzo(g,h,i)perylene	ND	15		mg/Kg	10	5/21/2007
Benzo(k)fluoranthene	ND	25		mg/Kg	10	5/21/2007
Benzoic acid	ND	25		mg/Kg	10	5/21/2007
Benzyl alcohol	ND	50		mg/Kg	10	5/21/2007
Bis(2-chloroethoxy)methane	ND	25		mg/Kg	10	5/21/2007
Bis(2-chloroethyl)ether	ND	13		mg/Kg	10	5/21/2007
Bis(2-chloroisopropyl)ether	ND	25		mg/Kg	10	5/21/2007
Bis(2-ethylhexyl)phthalate	ND	10		mg/Kg	10	5/21/2007
4-Bromophenyl phenyl ether	ND	13		mg/Kg	10	5/21/2007
Butyl benzyl phthalate	ND	10		mg/Kg	10	5/21/2007
Carbazole	ND	10		mg/Kg	10	5/21/2007
4-Chloro-3-methylphenol	ND	10		mg/Kg	10	5/21/2007
4-Chloroaniline	ND	10		mg/Kg	10	5/21/2007
2-Chloronaphthalene	ND	10		mg/Kg	10	5/21/2007
2-Chlorophenol	ND	10		mg/Kg	10	5/21/2007
4-Chlorophenyl phenyl ether	ND	10		mg/Kg	10	5/21/2007
Chrysene	ND	10		mg/Kg	10	5/21/2007
Di-n-butyl phthalate	ND	25		mg/Kg	10	5/21/2007
Di-n-octyl phthalate	ND	25		mg/Kg	10	5/21/2007
Dibenz(a,h)anthracene	ND	13		mg/Kg	10	5/21/2007
Dibenzofuran	ND	25		mg/Kg	10	5/21/2007

Qualifiers: * Value exceeds Maximum Contaminant Level
 E Value above quantitation range
 J Analyte detected below quantitation limits
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 30-May-07

CLIENT: Giant Refining Co
 Lab Order: 0705139
 Project: Soil Samples
 Lab ID: 0705139-02

Client Sample ID: ASO Soil
 Collection Date: 5/8/2007 11:06:00 AM
 Date Received: 5/10/2007
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8270C: SEMIVOLATILES						
1,2-Dichlorobenzene	ND	10		mg/Kg	10	5/21/2007
1,3-Dichlorobenzene	ND	10		mg/Kg	10	5/21/2007
1,4-Dichlorobenzene	ND	10		mg/Kg	10	5/21/2007
3,3'-Dichlorobenzidine	ND	10		mg/Kg	10	5/21/2007
Diethyl phthalate	ND	10		mg/Kg	10	5/21/2007
Dimethyl phthalate	ND	10		mg/Kg	10	5/21/2007
2,4-Dichlorophenol	ND	10		mg/Kg	10	5/21/2007
2,4-Dimethylphenol	ND	25		mg/Kg	10	5/21/2007
4,6-Dinitro-2-methylphenol	ND	25		mg/Kg	10	5/21/2007
2,4-Dinitrophenol	ND	10		mg/Kg	10	5/21/2007
2,4-Dinitrotoluene	ND	10		mg/Kg	10	5/21/2007
2,6-Dinitrotoluene	ND	10		mg/Kg	10	5/21/2007
Fluoranthene	ND	10		mg/Kg	10	5/21/2007
Fluorene	ND	10		mg/Kg	10	5/21/2007
Hexachlorobenzene	ND	10		mg/Kg	10	5/21/2007
Hexachlorobutadiene	ND	10		mg/Kg	10	5/21/2007
Hexachlorocyclopentadiene	ND	13		mg/Kg	10	5/21/2007
Hexachloroethane	ND	25		mg/Kg	10	5/21/2007
Indeno(1,2,3-cd)pyrene	ND	10		mg/Kg	10	5/21/2007
Isophorone	ND	10		mg/Kg	10	5/21/2007
2-Methylnaphthalene	ND	10		mg/Kg	10	5/21/2007
2-Methylphenol	11	10		mg/Kg	10	5/21/2007
3+4-Methylphenol	ND	10		mg/Kg	10	5/21/2007
N-Nitrosodi-n-propylamine	ND	10		mg/Kg	10	5/21/2007
N-Nitrosodiphenylamine	ND	10		mg/Kg	10	5/21/2007
Naphthalene	ND	25		mg/Kg	10	5/21/2007
2-Nitroaniline	ND	25		mg/Kg	10	5/21/2007
3-Nitroaniline	ND	13		mg/Kg	10	5/21/2007
4-Nitroaniline	ND	10		mg/Kg	10	5/21/2007
Nitrobenzene	ND	10		mg/Kg	10	5/21/2007
2-Nitrophenol	ND	10		mg/Kg	10	5/21/2007
4-Nitrophenol	ND	25		mg/Kg	10	5/21/2007
Pentachlorophenol	ND	10		mg/Kg	10	5/21/2007
Phenanthrene	ND	10		mg/Kg	10	5/21/2007
Phenol	ND	10		mg/Kg	10	5/21/2007
Pyrene	ND	25		mg/Kg	10	5/21/2007
Pyridine	ND	10		mg/Kg	10	5/21/2007
1,2,4-Trichlorobenzene	ND	10		mg/Kg	10	5/21/2007
2,4,5-Trichlorophenol	ND	10		mg/Kg	10	5/21/2007
2,4,6-Trichlorophenol	42.9	35.5-141		%REC	10	5/21/2007
Surr: 2,4,6-Tribromophenol						

Analyst: BL

- Qualifiers:
- * Value exceeds Maximum Contaminant Level
 - E Value above quantitation range
 - J Analyte detected below quantitation limits
 - ND Not Detected at the Reporting Limit
 - S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 30-May-07

CLIENT: Giant Refining Co
 Lab Order: 0705139
 Project: Soil Samples
 Lab ID: 0705139-02

Client Sample ID: ASO Soil
 Collection Date: 5/8/2007 11:06:00 AM
 Date Received: 5/10/2007
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8270C: SEMIVOLATILES						
Surr: 2-Fluorobiphenyl	55.9	30.4-128		%REC	10	5/21/2007
Surr: 2-Fluorophenol	57.9	28.1-129		%REC	10	5/21/2007
Surr: 4-Terphenyl-d14	91.6	34.6-151		%REC	10	5/21/2007
Surr: Nitrobenzene-d5	80.8	26.5-122		%REC	10	5/21/2007
Surr: Phenol-d5	61.3	37.6-118		%REC	10	5/21/2007

Analyst: BL

EPA METHOD 8260B: VOLATILES

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260B: VOLATILES						
Benzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Toluene	0.41	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Ethylbenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Methyl tert-butyl ether (MTBE)	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,2,4-Trimethylbenzene	12	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,3,5-Trimethylbenzene	6.8	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,2-Dichloroethane (EDC)	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,2-Dibromoethane (EDB)	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Naphthalene	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
1-Methylnaphthalene	1.8	1.0		mg/Kg	5	5/18/2007 12:13:53 PM
2-Methylnaphthalene	2.3	1.0		mg/Kg	5	5/18/2007 12:13:53 PM
Acetone	ND	3.8		mg/Kg	5	5/18/2007 12:13:53 PM
Bromobenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Bromochloromethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Bromodichloromethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Bromoform	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Bromomethane	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
2-Butanone	ND	2.5		mg/Kg	5	5/18/2007 12:13:53 PM
Carbon disulfide	ND	2.5		mg/Kg	5	5/18/2007 12:13:53 PM
Carbon tetrachloride	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
Chlorobenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Chloroethane	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
Chloroform	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Chloromethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
2-Chlorotoluene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
4-Chlorotoluene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
cis-1,2-DCE	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
cis-1,3-Dichloropropene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,2-Dibromo-3-chloropropane	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
Dibromochloromethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Dibromomethane	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
1,2-Dichlorobenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,3-Dichlorobenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,4-Dichlorobenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM

Analyst: SMP

- Qualifiers:
- Value exceeds Maximum Contaminant Level
 - E Value above quantitation range
 - J Analyte detected below quantitation limits
 - ND Not Detected at the Reporting Limit
 - S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 30-May-07

CLIENT: Giant Refining Co
 Lab Order: 0705139
 Project: Soil Samples
 Lab ID: 0705139-02

Client Sample ID: ASO Soil
 Collection Date: 5/8/2007 11:06:00 AM
 Date Received: 5/10/2007
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260B: VOLATILES						
						Analyst: SMP
Dichlorodifluoromethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,1-Dichloroethane	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
1,1-Dichloroethene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,2-Dichloropropane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,3-Dichloropropane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
2,2-Dichloropropane	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
1,1-Dichloropropene	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
Hexachlorobutadiene	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
2-Hexanone	ND	2.5		mg/Kg	5	5/18/2007 12:13:53 PM
Isopropylbenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
4-Isopropyltoluene	0.60	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
4-Methyl-2-pentanone	ND	2.5		mg/Kg	5	5/18/2007 12:13:53 PM
Methylene chloride	ND	0.75		mg/Kg	5	5/18/2007 12:13:53 PM
n-Butylbenzene	2.3	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
n-Propylbenzene	1.0	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
sec-Butylbenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Styrene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
tert-Butylbenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,1,1,2-Tetrachloroethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,1,2,2-Tetrachloroethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Tetrachloroethene (PCE)	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
trans-1,2-DCE	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
trans-1,3-Dichloropropene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,2,3-Trichlorobenzene	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
1,2,4-Trichlorobenzene	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,1,1-Trichloroethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,1,2-Trichloroethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Trichloroethene (TCE)	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Trichlorofluoromethane	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
1,2,3-Trichloropropane	ND	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
Vinyl chloride	ND	0.25		mg/Kg	5	5/18/2007 12:13:53 PM
Xylenes, Total	4.5	0.50		mg/Kg	5	5/18/2007 12:13:53 PM
Surr: 1,2-Dichloroethane-d4	117	62.1-102	S	%REC	5	5/18/2007 12:13:53 PM
Surr: 4-Bromofluorobenzene	766	72-107	S	%REC	5	5/18/2007 12:13:53 PM
Surr: Dibromofluoromethane	119	56.6-105	S	%REC	5	5/18/2007 12:13:53 PM
Surr: Toluene-d8	79.9	83.4-104	S	%REC	5	5/18/2007 12:13:53 PM

- Qualifiers:
- * Value exceeds Maximum Contaminant Level
 - E Value above quantitation range
 - J Analyte detected below quantitation limits
 - ND Not Detected at the Reporting Limit
 - S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

CHAIN-OF-CUSTODY RECORD

QA/QC Package

Std Level 4

Other: _____

Client: **Giant Refining
Albion Refinery**
Address: **Rt. 3, Box 7
Allup, NM 87301**

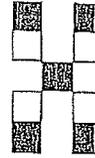
Project Name: **Soil Samples**

Project #: _____

Project Manager: **Cheryl Johnson**

Contact: **Johnson@giant.com**
Phone #: **505 722 0231**
Fax #: **505 722 0210**

Sampler: **Cheryl Johnson**
Sample Temperature: **3**



**HALL ENVIRONMENTAL
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www.hallenvironmental.com

ANALYSIS REQUEST

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)	B31D (PNA or PAH)	RCRA 6 Metals	Anions (F, Cl, NO ₂ , NO ₃ , PO ₄ , SO ₄)	8081 Pesticides / PCB's (8082)	8260B (VDA)	8270 (Semi-VDA)
				HgCl ₂	HNO ₃														
1053	Sludge	T703 Soil	2x 4oz jar				0705139												
1106	Sludge	ASO Soil*	2x 4oz jar				-2								X		X	X	
1119	Soil	T581 Soil	2x 4oz jar				-3								X		X	X	
1145	Soil	Bundle Pad	2x 4oz jar				-4								X		X	X	
1131	Soil	T575 Soil	2x 4oz jar				-5								X		X	X	
1156	Soil	Salt Dryer	2x 4oz jar				-6								X		X	X	

Time: **1315**
Relinquished By: (Signature) *[Signature]*
Time: **0910**
Relinquished By: (Signature) *[Signature]*

Received By: (Signature) *[Signature]*
Received By: (Signature) *[Signature]*
5/10/07
0910

Remarks: **ASO soil may contain traces of acid, handle w/caution.**

Air Bubbles or Headspace (Y or N)

Attachment 5

Hall Environmental Analysis Laboratory, Inc.

Date: 09-Oct-07

CLIENT: Giant Refining Company
 Lab Order: 0709278
 Project: Soil Samples
 Lab ID: 0709278-08

Client Sample ID: Cont. Pad
 Collection Date: 9/19/2007 2:50:00 PM
 Date Received: 9/20/2007
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 9056A: ANIONS						
Fluoride	43	3.0		mg/Kg	10	9/28/2007 4:21:28 AM
Chloride	40	3.0		mg/Kg	10	9/28/2007 4:21:28 AM
MERCURY, TCLP						
Mercury	ND	0.020		mg/L	1	10/2/2007 3:03:15 PM
EPA METHOD 6010B: TCLP METALS						
Arsenic	ND	5.0		mg/L	1	9/29/2007 2:04:16 PM
Barium	ND	100		mg/L	1	9/29/2007 2:04:16 PM
Cadmium	ND	1.0		mg/L	1	9/29/2007 2:04:16 PM
Chromium	ND	5.0		mg/L	1	9/29/2007 2:04:16 PM
Lead	ND	5.0		mg/L	1	9/29/2007 2:04:16 PM
Selenium	ND	1.0		mg/L	1	9/29/2007 2:04:16 PM
Silver	ND	5.0		mg/L	1	9/29/2007 2:04:16 PM
EPA METHOD 8270C TCLP						
2,4-Dinitrotoluene	ND	0.13		mg/L	1	9/26/2007
Hexachlorobenzene	ND	0.13		mg/L	1	9/26/2007
Hexachlorobutadiene	ND	0.50		mg/L	1	9/26/2007
Hexachloroethane	ND	3.0		mg/L	1	9/26/2007
Nitrobenzene	ND	2.0		mg/L	1	9/26/2007
Pentachlorophenol	ND	100		mg/L	1	9/26/2007
Pyridine	ND	5.0		mg/L	1	9/26/2007
2,4,5-Trichlorophenol	ND	400		mg/L	1	9/26/2007
2,4,6-Trichlorophenol	ND	2.0		mg/L	1	9/26/2007
Cresols, Total	ND	200		mg/L	1	9/26/2007
Surr: 2,4,6-Tribromophenol	92.9	20.9-128		%REC	1	9/26/2007
Surr: 2-Fluorobiphenyl	79.6	18.3-119		%REC	1	9/26/2007
Surr: 2-Fluorophenol	49.7	16.6-101		%REC	1	9/26/2007
Surr: 4-Terphenyl-d14	71.8	32.3-135		%REC	1	9/26/2007
Surr: Nitrobenzene-d5	69.4	22.6-117		%REC	1	9/26/2007
Surr: Phenol-d5	38.5	8-77.9		%REC	1	9/26/2007
VOLATILES BY 8260B/1311						
Benzene	ND	0.50		mg/L	1	10/4/2007 12:42:31 PM
2-Butanone	ND	10		mg/L	1	10/4/2007 12:42:31 PM
Carbon Tetrachloride	ND	0.50		mg/L	1	10/4/2007 12:42:31 PM
Chlorobenzene	ND	100		mg/L	1	10/4/2007 12:42:31 PM
Chloroform	ND	6.0		mg/L	1	10/4/2007 12:42:31 PM
1,4-Dichlorobenzene	ND	7.5		mg/L	1	10/4/2007 12:42:31 PM

Qualifiers: * Value exceeds Maximum Contaminant Level
 E Value above quantitation range
 J Analyte detected below quantitation limits
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 09-Oct-07

CLIENT: Giant Refining Company
 Lab Order: 0709278
 Project: Soil Samples
 Lab ID: 0709278-08

Client Sample ID: Cont. Pad
 Collection Date: 9/19/2007 2:50:00 PM
 Date Received: 9/20/2007
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
Analyst: LMM						
VOLATILES BY 8260B/1311						
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	10/4/2007 12:42:31 PM
1,1-Dichloroethene	ND	0.70		mg/L	1	10/4/2007 12:42:31 PM
Hexachlorobutadiene	ND	0.50		mg/L	1	10/4/2007 12:42:31 PM
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	10/4/2007 12:42:31 PM
Trichloroethene (TCE)	ND	0.50		mg/L	1	10/4/2007 12:42:31 PM
Vinyl chloride	ND	0.20		mg/L	1	10/4/2007 12:42:31 PM
Surr: 1,2-Dichloroethane-d4	101	89.9-130		%REC	1	10/4/2007 12:42:31 PM
Surr: 4-Bromofluorobenzene	104	71.2-123		%REC	1	10/4/2007 12:42:31 PM
Surr: Dibromofluoromethane	97.8	73.9-134		%REC	1	10/4/2007 12:42:31 PM
Surr: Toluene-d8	99.4	81.9-122		%REC	1	10/4/2007 12:42:31 PM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit



ENERGY LABORATORIES, INC. • P.O. Box 30916 • 1120 South 27th Street • Billings, MT 59107-0916
800-735-4489 • 406-252-6325 • 406-252-6069 fax • eli@energylab.com

LABORATORY ANALYTICAL REPORT

Client: Hall Environmental-Albuquerque
Project: 0709278
Lab ID: B07092148-008
Client Sample ID: 0709278-08C, Cont. Pad

Report Date: 10/09/07
Collection Date: 09/19/07 14:50
Date Received: 09/25/07
Matrix: Soil

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
IGNITABILITY Flash Point (Ignitability)	>200	°F		30.0		SW1010M	10/02/07 15:37 / mgs
CORROSIVITY pH of Soil and Waste	5.91	s.u.		0.10		SW9045D	10/01/07 10:00 / pwc
REACTIVITY Cyanide, Reactive	ND	mg/kg		0.05	250	SW846 Ch 7	09/26/07 16:40 / kjp
Sulfide, Reactive	ND	mg/kg		20	500	SW846 Ch 7	09/26/07 08:00 / pwc

Report
Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.

Attachment 6

ENVIRONMENTAL PROCEDURE E-6
HEAT EXCHANGER BUNDLE CLEANING (HXBC) PROCEDURE

PURPOSE:

The purpose of this procedure is to provide specific guidance for performing heat exchanger cleaning at the Gallup Refinery. Sludges generated from the cleaning of heat exchangers from petroleum refinery process units are a listed hazardous waste (K050). As a result, it is extremely important that the specific requirements contained in this procedure be followed for preparing, disassembling and cleaning heat exchangers and managing liquid hydrocarbons, wash water, and sludges generated from these activities. There are no exceptions to this listing for cooling water exchangers.

The specific objectives for this procedure are as follows:

- Minimize the potential for personnel exposure of hazardous substances.
- Minimize the potential for the release, spreading, or commingling of hazardous waste when removing, transporting, and cleaning heat exchanger bundles.
- Minimize labor costs of cleanup and waste disposal from improper work area preparation.
- Minimize the potential for regulatory sanctions due to improper waste handling practices.

SCOPE:

This procedure applies to the proper management of Heat Exchanger Bundle Cleaning (HXBC) sludges and residues.

RESPONSIBILITY :

- All personnel, including contractors, are required to follow this procedure when generating sludge/solids/sediments and managing those materials in drums at the Gallup Refinery.
- The Maintenance Department or designee is responsible for providing assistance with equipment and manpower, as required, for any waste. It is also the responsibility of the Maintenance Department or designee to communicate the potential generation of waste from a project or event prior to work commencement.
- The Environmental Department is responsible for assisting with identification or labeling of any waste. Waste labels are kept at the Environmental Department Office or may be obtained from the Warehouse with guidance from the Environmental Department.

EQUIPMENT/ TOOLS USED:

- High pressure jet rig
- Bundle Extractor
- Crane
- Forklift
- Scaffold
- Vacuum Truck

Approved/Recertified E. Riege	Effective 10/8/07	Supercedes 10/31/05	Revision # 1	Page 1 of 5
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Environmental Procedure E-6
Heat Exchanger Bundle Cleaning (HXBC) Procedure

MATERIALS USED:

- Open top 55-gallon drums, in good condition
- Drum labels
- Poly sheeting
- Lumber or some other berming material

ENVIRONMENTAL CONSIDERATIONS:

This procedure is based upon EPA RCRA regulations. Failure to comply could result in violations from NMED or the EPA.

COST CONSIDERATIONS:

- Avoidance of fines for failure to follow RCRA regulations.
- Reduce costs for hazardous waste disposal by minimizing solid/sludges from going down the drain.

REFERENCES:

40 CFR 262.34

PROCEDURE/WORK INSTRUCTIONS:

Environmental Department:

- Assist the Maintenance Department and or Contractor in the development of a plan and serve as the proponent of the plan.
- Participate in pre-job meetings and/or provide personnel training as needed to communicate environmental requirements relating to bundle cleaning.
- Provide appropriate containers (drums or roll-off boxes), labels and guidance on in-plant staging of containers after they are filled.
- Review work progress of bundle removal and cleaning to ensure that the requirements of this Environmental Procedure are being met.
- Provide guidance to the Maintenance and Operations Departments as needed for the implementation of this procedure.

Maintenance Department:

- Provide verbal, written or electronic notification to the Environmental Department in advance of work involving heat exchangers that may result in the generation of hydrocarbon, water, and/or solid material.
- Ensure containers of hazardous waste generated from bundle removal or cleaning are properly labeled, temporarily stored, and removed from the work area to the hazardous waste container storage area within three calendar days of being filled. Tarps or lids should be securely attached

Approved/Recertified E. Riege	Effective 10/8/07	Supersedes 10/31/05	Revision # 1	Page 2 of 5
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Environmental Procedure E-6
Heat Exchanger Bundle Cleaning (HXBC) Procedure

- to the container unless adding to or taking out of the container. Communicate with the Environmental Department when containers have been moved to staging.
- Ensure that all personnel, including contractors, performing heat exchanger bundle removal and cleaning have been trained in the requirements of this procedure and that they follow the requirements of this procedure during the course of performing work involving heat exchangers.
 - Ensure that materials handled by vacuum trucks, including hydrocarbon and hydrocarbon-water mixtures, are documented on the contractor's **Vacuum Truck Movement Log** and are unloaded at the location authorized by the Environmental Department.
 - Visually inspect the bundle cleaning pad surface in advance of any bundle cleaning work on the bundle cleaning pad. **No** bundle cleaning shall be allowed until any necessary repairs are completed or provisions are made for adequate containment.
 - Monitor the progress of bundle removal or cleaning work and ensure that all residues from bundle removal or cleaning are containerized, if possible, by the end of the shift on which they are generated. If extended shifts (24 hour) are utilized, work can progress through shift changes and cleanup can occur once work is completed.
 - Inspect work areas where heat exchanger bundles are being removed or cleaned to ensure that these areas are cleaned by the end of the shift and that any wastes related to bundle cleaning are properly containerized and moved to the appropriate storage location.

Operations Department:

- The Operations Department will prepare heat exchangers in a manner that will remove and recycle as much product as possible before allowing blinding to begin.

Maintenance/Contractor Cleaning Procedures:

- The cleaning procedures are divided into four parts: **pre-work coordination, initial exchanger disassembly, cleaning in place, and jetting on the bundle cleaning pad.** Environmental requirements for each of these steps are provided in the following sections.

Pre-Work Coordination:

- Once heat exchanger cleaning is scheduled, the Maintenance Department will notify the Environmental Department via verbal, written or electronic notification.
- If the bundle cleaning pad will be used to clean any of the components of the heat exchanger(s) being disassembled, the Maintenance Department will arrange for the inspection of the bundle cleaning pad for cracks and/or other damage to the surface coating and will repair any areas that prior to cleaning of tube bundles or exchanger components on the pad.
- The Maintenance Department will verify adequacy of repairs in a follow-up inspection and will provide written documentation that the required repairs have been completed.

Initial Exchanger Disassembly:

- Maintenance will obtain poly sheeting, catch pans, 55-gallon DOT approved 3-ringed drums, and hazardous waste labels in advance of beginning disassembly process.
- Prior to removing any heat exchanger component that could release process liquids or residues, Maintenance will prepare the work area surface beneath the heat exchanger head to remove any trash, soil, debris, or exchanger components and will lay protective poly sheeting and, as necessary, position poly catch pans to collect any hydrocarbons or residues from inside the heat exchanger and to prevent them from contacting the permanent surface beneath the exchanger.

Approved/Recertified E. Riege	Effective 10/8/07	Supercedes 10/31/05	Revision # 1	Page 3 of 5
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Environmental Procedure E-6
Heat Exchanger Bundle Cleaning (HXBC) Procedure

- Once all studs are removed from the exchanger head, carefully detach the bellhead and/or channel head from the exchanger shell and remove any loose residues and place them directly into the 55-gallon drum. **NOTE: Place a trash bag or drum liner in the 55 gallon drum prior to placing waste in the drum in order to minimize contamination to the outside of the drum. Be sure to write the necessary information on the hazardous waste label and affix the label to the side of the drum.**
- Wrap channel head and bellhead in poly sheeting and transport to the wash pad for cleaning.

Cleaning in Place:

- Build a splash enclosure with side and back walls to minimize backslash or over spray from tube side jetting using scaffolding and polyethylene sheeting. **NOTE: If an elevated work platform (i.e., scaffolding) is required to provide a work surface during bundle cleaning, refer to safety requirements for setup of scaffolding. Evaluate the splash enclosure as it may be considered a confined space. Prior to personnel entry into the enclosure, the Safety Department should be contacted to determine whether confined space entry requirements apply.**
- Place or construct a temporary basin to collect water and solids from within the splash enclosure
- Jet bundle, collecting solid materials inside basin and allowing water to overflow the basin to the nearest sewer drain. If no sewer drain is nearby, remove accumulated water with a vacuum truck.
- Upon completion of jetting, drain as much water as possible from the containment basin, then containerize the poly and bundle sludge in a DOT approved 55-gallon drum labeled with the information as directed by the Environmental Department. **NOTE: Cleanup and containerize solids at or before the end of the shift. Ensure all containers of waste are closed and sealed prior to leaving the work site.**

Jetting on the Bundle Pad:

- Construct bermed areas for catching sludge as bundle is pulled, line with heavy poly sheeting. Berms should be approximately 5 feet wide and the length of the tube bundle. The bermed area can be formed using 2 x 6, 8, 10, or 12 inch lumber or plywood, 6" corrugated plastic pipe, or any other material sufficient to provide a stable containment area. A pan can be placed directly below the exchanger shell to catch the majority of sludge as the tube bundle is being removed from the shell. Once in the pan, the sludge can be easily containerized or vacuumed by Vacuum truck.
 - Completely wrap bundle with poly sheeting for transport to wash pad. **NOTE: Use duct tape to secure poly sheeting around exchanger bundle.**
 - If shell is to be washed, leave poly berm, but complete the washing promptly. Washing must be completed by the end of the shift following bundle removal.
 - When dismantling bermed containment areas, drain water to sewer, remove sludge from poly-lined bermed area and place in 55-gallon drum labeled with the information as received by the Environmental Department. **NOTE: If poly is not grossly contaminated and additional tube bundles are to be pulled, poly can be cleaned and reused for other berming or bundle wrapping. If it is not to be reused, it may be placed in the 55-gallon drum with the bundle sludge.**
 - Leave area as clean as or cleaner than it is was before starting work. Any residues generated during the bundle extraction or shell cleaning must be containerized as a hazardous waste.
- NOTE: Bundle sludge has to be contained to as small an area as possible. Cleaning must be**

Approved/Recertified E. Riege	Effective 10/8/07	Supersedes 10/31/05	Revision # 1	Page 4 of 5
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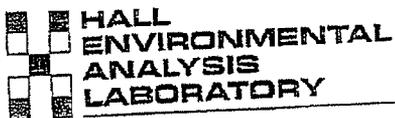
Environmental Procedure E-6
Heat Exchanger Bundle Cleaning (HXBC) Procedure

performed in a manner so that spreading of sludge by over spray and splatter does not occur. For bundles that will not fit within the bundle cleaning enclosure, plywood and/or poly sheeting on makeshift frames should be positioned to block splatter as necessary.

- Do not track bundle sludge off pad - either on tires or shoes/boots. Personnel performing bundle cleaning operations should wear disposable foot coverings and should remove these along with their disposable coveralls. When moving bundles using a crane, keep vehicle traffic off pad during jetting operations. Any vehicle whose tires come in contact with bundle sludge must be decontaminated before it can be driven off the cleaning pad.
- Clean up at end of shift or at the end of cleaning, whichever comes first. Sludge and any poly used to wrap bundles must be placed in drums. Wash down pad and roller with power washer. Use water-soluble degreaser to remove oily residues. Bundle cleaning is not complete until the pad is free of oily residues and all poly, disposable coveralls, and cleaning sludges have been removed and containerized. **NOTE: Only those soaps/ degreasers approved by the Environmental Department can be used for cleaning. PLEASE USE APPROVED DEGREASERS SPARINGLY TO PREVENT NEGATIVE IMPACTS AT THE WASTEWATER TREATMENT PLANT!**
- Ensure drum(s) are labeled and palletized for movement to the < 90 day hazardous waste storage area. Contact Maintenance to arrange for movement. Palletize drums so that the labels face outward for inspection. Drums must be clean before they can be transported.
- Heat Exchanger Bundle Cleaning sludge contained in a Vacuum Truck can be offloaded into drums at the Bundle Cleaning Pad.

Approved/Recertified E. Riege	Effective 10/8/07	Supercedes 10/31/05	Revision # 1	Page 5 of 5
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Attachment 7



COVER LETTER

Thursday, September 20, 2007

Ron Starks
RINCHEM
6133 Edith Blvd., NE
Albuquerque, NM 87107

TEL: (505) 345-3655
FAX (505) 344-7986

RE: Western Refining-Gallup

Order No.: 0709197

Dear Ron Starks:

Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 9/17/2007 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

NM Lab # NM9425
AZ license # AZ0682
ORELAP Lab # NM100001



4901 Hawkins NE ■ Suite D ■ Albuquerque, NM 87109
505.345.3975 ■ Fax 505.345.4107
www.hallenvironmental.com

Hall Environmental Analysis Laboratory, Inc.

Date: 20-Sep-07

CLIENT: RINCHEM
 Lab Order: 0709197
 Project: Western Refining-Gallup
 Lab ID: 0709197-01

Client Sample ID: WR-G-1
 Collection Date: 9/17/2007 11:15:00 AM
 Date Received: 9/17/2007
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
Analyst: JDC						
EPA METHOD 8270C TCLP						
2,4-Dinitrotoluene	ND	0.13		mg/L	1	9/19/2007
Hexachlorobenzene	ND	0.13		mg/L	1	9/19/2007
Hexachlorobuladiene	ND	0.50		mg/L	1	9/19/2007
Hexachloroethane	ND	3.0		mg/L	1	9/19/2007
Nitrobenzene	ND	2.0		mg/L	1	9/19/2007
Pentachlorophenol	ND	100		mg/L	1	9/19/2007
Pyridine	ND	5.0		mg/L	1	9/19/2007
2,4,5-Trichlorophenol	ND	400		mg/L	1	9/19/2007
2,4,6-Trichlorophenol	ND	2.0		mg/L	1	9/19/2007
Cresols, Total	ND	200		mg/L	1	9/19/2007
Surr: 2,4,6-Tribromophenol	74.9	20.9-128		%REC	1	9/19/2007
Surr: 2-Fluorobiphenyl	76.8	18.3-119		%REC	1	9/19/2007
Surr: 2-Fluorophenol	63.9	16.6-101		%REC	1	9/19/2007
Surr: 4-Terphenyl-d14	70.4	32.3-135		%REC	1	9/19/2007
Surr: Nitrobenzene-d5	86.3	22.6-117		%REC	1	9/19/2007
Surr: Phenol-d5	27.7	8-77.9		%REC	1	9/19/2007
Analyst: SMP						
VOLATILES BY 8260B/1311						
Benzene	ND	0.50		mg/L	1	9/18/2007
2-Butanone	ND	10		mg/L	1	9/18/2007
Carbon Tetrachloride	ND	0.50		mg/L	1	9/18/2007
Chlorobenzene	ND	100		mg/L	1	9/18/2007
Chloroform	ND	6.0		mg/L	1	9/18/2007
1,4-Dichlorobenzene	ND	7.5		mg/L	1	9/18/2007
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	9/18/2007
1,1-Dichloroethene	ND	0.70		mg/L	1	9/18/2007
Hexachlorobutadiene	ND	0.50		mg/L	1	9/18/2007
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	9/18/2007
Trichloroethene (TCE)	ND	0.50		mg/L	1	9/18/2007
Vinyl chloride	ND	0.20		mg/L	1	9/18/2007
Surr: 1,2-Dichloroethane-d4	97.1	69.9-130		%REC	1	9/18/2007
Surr: 4-Bromofluorobenzene	97.5	71.2-123		%REC	1	9/18/2007
Surr: Dibromofluoromethane	90.6	73.9-134		%REC	1	9/18/2007
Surr: Toluene-d8	103	81.9-122		%REC	1	9/18/2007

Qualifiers:
 * Value exceeds Maximum Contaminant Level
 E Value above quantitation range
 J Analyte detected below quantitation limits
 ND Not Detected at the Reporting Limit
 S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
 H Holding times for preparation or analysis exceeded
 MCL Maximum Contaminant Level
 RL Reporting Limit

QA/QC SUMMARY REPORT

Client: RINCHEM
 Project: Western Refining-Gallup

Work Order: 0709197

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
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Method: SW1311/8270
 Sample ID: mb-13862

MBLK

Batch ID: 13862 Analysis Date: 9/19/2007

2,4-Dinitrotoluene	ND	mg/L	0.13						
Hexachlorobenzene	ND	mg/L	0.13						
Hexachlorobutadiene	ND	mg/L	0.50						
Hexachloroethane	ND	mg/L	3.0						
Nitrobenzene	ND	mg/L	2.0						
Pentachlorophenol	ND	mg/L	100						
Pyridine	ND	mg/L	5.0						
2,4,5-Trichlorophenol	ND	mg/L	400						
2,4,6-Trichlorophenol	ND	mg/L	2.0						
Cresols, Total	ND	mg/L	200						

Sample ID: lcs-13862

LCS

Batch ID: 13862 Analysis Date: 9/19/2007

2,4-Dinitrotoluene	0.07666	mg/L	0.0010	76.7	38.4	94.2			S
Hexachlorobenzene	0.08544	mg/L	0.0010	85.4	42.1	81.1			
Hexachlorobutadiene	0.05902	mg/L	0.0010	59.0	34.3	85.2			
Hexachloroethane	0.05418	mg/L	0.0010	54.2	33.2	85.3			
Nitrobenzene	0.07778	mg/L	0.0010	77.8	6.84	126			
Pentachlorophenol	0.07928	mg/L	0.0010	79.3	6.48	109			
Pyridine	0.05558	mg/L	0.0010	55.6	1.11	76.5			
2,4,5-Trichlorophenol	0.07212	mg/L	0.0010	72.1	18.5	95.3			
2,4,6-Trichlorophenol	0.07732	mg/L	0.0010	77.3	13	103			
Cresols, Total	0.1848	mg/L	0.0010	61.6	5.76	107			

Sample ID: lcsd-13862

LCSD

Batch ID: 13862 Analysis Date: 9/19/2007

2,4-Dinitrotoluene	0.07648	mg/L	0.0010	76.5	38.4	94.2	0.235	15.5	S
Hexachlorobenzene	0.08482	mg/L	0.0010	84.8	42.1	81.1	0.728	15.9	
Hexachlorobutadiene	0.05602	mg/L	0.0010	56.0	34.3	85.2	5.22	32.7	
Hexachloroethane	0.05242	mg/L	0.0010	52.4	33.2	85.3	3.30	36.7	
Nitrobenzene	0.07454	mg/L	0.0010	74.5	6.84	126	4.25	23	
Pentachlorophenol	0.07816	mg/L	0.0010	78.2	6.48	109	1.42	18.6	
Pyridine	0.05290	mg/L	0.0010	52.9	1.11	76.5	4.94	52	
2,4,5-Trichlorophenol	0.06744	mg/L	0.0010	67.4	18.5	95.3	6.71	39.3	
2,4,6-Trichlorophenol	0.07536	mg/L	0.0010	75.4	13	103	2.57	59.6	
Cresols, Total	0.1761	mg/L	0.0010	58.7	5.76	107	4.79	29.6	

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 Spike recovery outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: RINCHEM
 Project: Western Refining-Gallup

Work Order: 0709197

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
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Method: SW8260B
 Sample ID: MB-13849

MBLK

Batch ID: 13849 Analysis Date: 9/18/2007

Benzene	ND	mg/L	0.50
2-Butanone	ND	mg/L	10
Carbon Tetrachloride	ND	mg/L	0.50
Chlorobenzene	ND	mg/L	100
Chloroform	ND	mg/L	6.0
1,4-Dichlorobenzene	ND	mg/L	7.5
1,2-Dichloroethane (EDC)	ND	mg/L	0.50
1,1-Dichloroethene	ND	mg/L	0.70
Hexachlorobutadiene	ND	mg/L	0.50
Tetrachloroethene (PCE)	ND	mg/L	0.70
Trichloroethene (TCE)	ND	mg/L	0.50
Vinyl chloride	ND	mg/L	0.20

Sample ID: LCS-13849

LCS

Batch ID: 13849 Analysis Date: 9/18/2007

Benzene	411.4	mg/L	0.50	103	51.1	171
Chlorobenzene	412.0	mg/L	100	103	36.1	191
1,1-Dichloroethene	389.8	mg/L	0.70	97.5	49.1	162
Trichloroethene (TCE)	368.2	mg/L	0.50	92.1	41.2	166

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 Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name RINCHEM

Date and Time Received:

9/17/07

Work Order Number 0709197

Received by AMF

Checklist completed by

Signature



9/17/07

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? Yes No No VOA vials submitted Yes No
- Water - Preservation labels on bottle and cap match? Yes No N/A
- Water - pH acceptable upon receipt? Yes No N/A
- Container/Temp Blank temperature? 26° 4° C ± 2 Acceptable
If given sufficient time to cool.

COMMENTS:

Client contacted

Date contacted:

Person contacted

Contacted by:

Regarding

Comments:

Corrective Action

Attachment 8

Hall Environmental Analysis Laboratory, Inc.

Date: 09-Oct-07

CLIENT: Giant Refining Company
Lab Order: 0709278
Project: Soil Samples
Lab ID: 0709278-03

Client Sample ID: SwrBx Pad
Collection Date: 9/19/2007 3:01:00 PM
Date Received: 9/20/2007
Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
Analyst: KS						
EPA METHOD 9056A: ANIONS						
Fluoride	19	1.5		mg/Kg	5	9/28/2007 2:19:36 AM
Chloride	230	1.5		mg/Kg	5	9/28/2007 2:19:36 AM
Analyst: SLB						
MERCURY, TCLP						
Mercury	ND	0.020		mg/L	1	10/2/2007 2:55:12 PM
Analyst: TES						
EPA METHOD 6010B: TCLP METALS						
Arsenic	ND	5.0		mg/L	1	9/29/2007 1:46:13 PM
Barium	ND	100		mg/L	1	9/29/2007 1:46:13 PM
Cadmium	ND	1.0		mg/L	1	9/29/2007 1:46:13 PM
Chromium	ND	5.0		mg/L	1	9/29/2007 1:46:13 PM
Lead	ND	5.0		mg/L	1	9/29/2007 1:46:13 PM
Selenium	ND	1.0		mg/L	1	9/29/2007 1:46:13 PM
Silver	ND	5.0		mg/L	1	9/29/2007 1:46:13 PM
Analyst: JDC						
EPA METHOD 8270C TCLP						
2,4-Dinitrotoluene	ND	0.13		mg/L	1	9/26/2007
Hexachlorobenzene	ND	0.13		mg/L	1	9/26/2007
Hexachlorobutadiene	ND	0.50		mg/L	1	9/26/2007
Hexachloroethane	ND	3.0		mg/L	1	9/26/2007
Nitrobenzene	ND	2.0		mg/L	1	9/26/2007
Pentachlorophenol	ND	100		mg/L	1	9/26/2007
Pyridine	ND	5.0		mg/L	1	9/26/2007
2,4,6-Trichlorophenol	ND	400		mg/L	1	9/26/2007
2,4,6-Trichlorophenol	ND	2.0		mg/L	1	9/26/2007
Cresols, Total	ND	200		mg/L	1	9/26/2007
Surr: 2,4,6-Tribromophenol	78.9	20.9-128		%REC	1	9/26/2007
Surr: 2-Fluorobiphenyl	69.3	18.3-119		%REC	1	9/26/2007
Surr: 2-Fluorophenol	49.6	16.6-101		%REC	1	9/26/2007
Surr: 4-Terphenyl-d14	56.9	32.3-135		%REC	1	9/26/2007
Surr: Nitrobenzene-d5	68.4	22.6-117		%REC	1	9/26/2007
Surr: Phenol-d5	39.5	8-77.9		%REC	1	9/26/2007
Analyst: LMM						
VOLATILES BY 8260B/1311						
Benzene	ND	0.50		mg/L	1	10/4/2007 5:34:05 AM
2-Butanone	ND	10		mg/L	1	10/4/2007 5:34:05 AM
Carbon Tetrachloride	ND	0.50		mg/L	1	10/4/2007 5:34:05 AM
Chlorobenzene	ND	100		mg/L	1	10/4/2007 5:34:05 AM
Chloroform	ND	6.0		mg/L	1	10/4/2007 5:34:05 AM
1,4-Dichlorobenzene	ND	7.5		mg/L	1	10/4/2007 5:34:05 AM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- c Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 09-Oct-07

CLIENT: Giant Refining Company
 Lab Order: 0709278
 Project: Soil Samples
 Lab ID: 0709278-03

Client Sample ID: SwrBx Pad
 Collection Date: 9/19/2007 3:01:00 PM
 Date Received: 9/20/2007
 Matrix: SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
Analyst: LMM						
VOLATILES BY 8260B/1311						
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	10/4/2007 5:34:05 AM
1,1-Dichloroethene	ND	0.70		mg/L	1	10/4/2007 5:34:05 AM
Hexachlorobutadiene	ND	0.50		mg/L	1	10/4/2007 5:34:05 AM
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	10/4/2007 5:34:05 AM
Trichloroethene (TCE)	ND	0.50		mg/L	1	10/4/2007 5:34:05 AM
Vinyl chloride	ND	0.20		mg/L	1	10/4/2007 5:34:05 AM
Surr: 1,2-Dichloroethane-d4	96.4	69.9-130		%REC	1	10/4/2007 5:34:05 AM
Surr: 4-Bromofluorobenzene	99.2	71.2-123		%REC	1	10/4/2007 5:34:05 AM
Surr: Dibromofluoromethane	98.4	73.9-134		%REC	1	10/4/2007 5:34:05 AM
Surr: Toluene-d8	102	81.9-122		%REC	1	10/4/2007 5:34:05 AM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit



ENERGY LABORATORIES, INC. • P.O. Box 30916 • 1120 South 27th Street • Billings, MT 59107-0916
800-735-4489 • 406-252-6325 • 406-252-6069 fax • all@energylab.com

LABORATORY ANALYTICAL REPORT

Client: Hall Environmental-Albuquerque
Project: 0709278
Lab ID: B07092148-003
Client Sample ID: 0709278-03C, SwrBx Pad

Report Date: 10/09/07
Collection Date: 09/19/07 15:01
Date Received: 09/25/07
Matrix: Soil

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
IGNITABILITY Flash Point (Ignitability)	>200	°F		30.0		SW1010M	10/02/07 15:37 / mgs
CORROSIVITY pH of Soil and Waste	7.78	s.u.		0.10		SW9045D	10/01/07 10:00 / pwc
REACTIVITY Cyanide, Reactive	ND	mg/kg		0.05	250	SW846 Ch 7	09/26/07 16:25 / kjp
Sulfide, Reactive	ND	mg/kg		20	500	SW846 Ch 7	09/26/07 08:00 / pwc

Report Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.

ATTACHMENT 9



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
525 Camino De Los Marquez
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-4358
Fax (505) 827-4389

MARK E. WEIDLER
SECRETARY
EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 13, 1995

John Stokes, Refinery Manager
Giant Refining Company
Ciniza Refinery
Route 3, Box 7
Gallup, New Mexico 87301

Dear Mr. Stokes,

RE: Part A Permit Revision

On March 10, 1995, the New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) received a copy of the Giant Refining Company-Ciniza (Giant) Part A Permit Modification request dated March 6, 1995, and sent to the Environmental Protection Agency (EPA). Giant is hereby notified that because the permit modification request concerns RCRA units, NMED and not EPA has the lead. The modification requested is a 337% increase in both API tank treatment capacity (API) and benzene stripping capacity.

The API and benzene stripping units appear on Giant's Part A Permit. However, they should not have been included on the Part A Permit as they are part of the process wastewater treatment system and are exempt from RCRA regulation. Also, evidence shows that the API and benzene strippers are regulated by the Oil Conservation Division (OCD) of the New Mexico Energy, Minerals and Natural Resources Department (EMNRD). OCD's Groundwater Discharge Permit #32 (GW 32), covers all discharges by the facility, including the API, benzene strippers and the aeration lagoons into which they discharge.

Required by the OCD is biennial groundwater monitoring which includes all approved RCRA constituents, to the standards of the New Mexico Water Quality Control Commission. Also required is annual monitoring of the API, benzene stripper and aeration lagoon effluents. Although the API and benzene stripper effluents are not monitored for RCRA constituents, the aeration lagoon into which they discharge are monitored for RCRA metals, and volatile and semi-volatile organics.

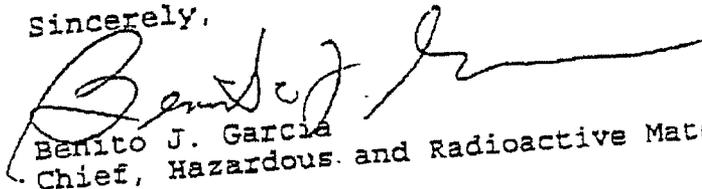
John Stokes
July 13, 1995
Page 2 of 2

Further, Giant has submitted to OCD a modification request identical to the March 6, 1995 request for modification of their RCRA Part A Permit. As per OCD's March 15, 1995 letter to Giant, approval of this modification request is conditional upon Giant's submittal of a closure plan for the existing API. This is analogous to RCRA requirements and further demonstrates that OCD requirements for the API and benzene strippers are protective of human health and the environment.

Therefore, HRMB requests that Giant submit a request for removal of the aforementioned units from Giant's Part A Permit to the Director of NMED Water and Waste Management Division (WWD) for his approval. If the Director approves the request, Giant will be required to submit a revised Part A Permit which excludes the API oil/water separator and the benzene strippers.

If there are any questions on this matter, you may contact Mr. Michael Chacón at (505) 827-4308.

Sincerely,



Benito J. Garcia
Chief, Hazardous and Radioactive Materials Bureau

cc: Roger Anderson, OCD
Ron Kern, HRMB Program Manager
Michael Chacón, RCRA Permits
David Neleigh, EPA
File-Red 95
File-Reading

ATTACHMENT 10



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
525 Camino De Los Marquez
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MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 14, 1995

Mr. David Pavlich
Health, Safety and Environmental Manager
Giant Refinery-Ciniza
Route 3, Box 7
Gallup, New Mexico 87301

Dear Mr. Pavlich,

RE: Request to amend Giant's Part A Permit.

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) is in receipt of the Giant Refining Company (Giant) letters to HRMB dated July 24 and 28, 1995. In the July 24 letter Giant agrees to HRMB's request (dated July 13, 1995) for Giant to request removal from their RCRA Part A Permit of the following items;

- the API separator
- the benzene strippers.

In the July 28 letter Giant adds the hazardous waste drum storage area to the removal request.

The API separator and benzene strippers are part of the process wastewater treatment system and thus are exempt from RCRA permitting requirements. Further, these units are regulated by NMED Oil Conservation Division (OCD). The hazardous waste drum storage area has not been constructed, and Giant has no plans to construct it, thus there is no need for it to be on the Part A Permit.

HRMB hereby approves Giant's request for removal of the aforementioned items from their Part A Permit. Giant must now submit to HRMB within two (2) weeks of receipt of this letter a revised Part A excluding these units.