

GW - 1

WORK PLANS

1998

Mark Ashley

From: Foust, Denny
Sent: Thursday, March 05, 1998 8:49 AM
To: Ashley, Mark
Subject: RE: Giant-bloomfield

-----Original Message-----

From: Ashley, Mark
Sent: Wednesday, March 04, 1998 3:22 PM
To: Foust, Denny
Subject: Giant-bloomfield
Importance: High

Denny,
Here is the letter I came up with for Giant. Give me a call when you have had a chance to review it.
I still haven't received your e-mail from Monday.
Mark

Mr. Lynn Shelton
Environmental Manager
Giant Refining Co.
P.O. Box 159
Bloomfield, NM 87413

**RE: Remediation Plan for the River Bank Contamination
Bloomfield Refinery (GW-001)
San Juan County, New Mexico**

Dear Mr. Shelton:

The New Mexico Oil Conservation Division (OCD) has completed a review of the Giant Refining Co. (Giant) "Remediation Plan for the River Bank Contamination" dated February 17, 1998. This plan contains Giant's proposal to install an impermeable barrier to prevent migration of contaminants to the San Juan River, installation of a monitor well in place of the current recovery culvert, and in-situ remediation of hydrocarbon contaminated soils. Based on the information provided, Giant's plan is hereby approved with the following conditions:

1. The monitor well will be constructed with:
 - a. A minimum of fifteen feet of well screen, with at least five feet of well screen above the water table and ten feet of well screen below the water table.
 - b. An appropriately sized gravel pack will be set around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug will be placed above the gravel pack.
 - d. The remainder of the hole will be grouted to the surface with cement containing 5% bentonite. *A 2 foot by 2 foot cement pad will be installed around the wellbore at the surface.*
2. After completion of the monitor well, ground water will be sampled and

analyzed for concentrations of BTEX on a quarterly basis. Quarterly reports will be sent to the OCD Santa Fe Division Office, and copies to the OCD Aztec District Office. Quarterly analysis of the ground water will continue until BTEX levels fall below Water Quality Control Commission (WQCC) levels. At that time *Giant may* make a request to the OCD to modify this remediation plan. The modification will include recommendations for future actions based on the results of ground water sampling *and may include proposals for sampling intervals.*

3. All separate phase hydrocarbons (SPH) will be recovered from the monitor well. Monthly SPH monitoring will continue one year beyond the last detected SPH. When one year without SPH detection has been reached, Giant will make a request to the OCD to modify this remediation plan. The modification will include recommendations for future actions based on the results of ground water sampling.
4. The hydrocarbon contaminated soils will be sampled annually until BTEX levels fall below WQCC levels. At that time Giant will make a request to the OCD to modify this remediation plan. The modification will include recommendations for future actions based on the results of ground water sampling.
5. The recovery culvert will be plugged using materials consistent with the surrounding river bank.
6. Giant will submit a report on remediation activities to the OCD by September 1, 1998. The report will include a description of the actions performed and the results of the most recent sampling activities.
7. Giant will notify the OCD Aztec District Office at least 72 hours in advance of all activities.
8. All original documents will be submitted to the OCD Santa Fe Office with copies provided to the OCD Aztec District Office.
9. *Please note potential for hydraulic head behind the the sheet piling installation does exist.*
10. *Applications of fertilizer and oxidizers should be directly to contaminated soils where ever possible.*

Please be advised that OCD approval does not relieve Giant of liability if contamination exists which is beyond the scope of this remediation plan or if the activities fail to adequately determine the extent of contamination related to Giant's activities. In addition, OCD approval does not relieve Giant of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7155.

Sincerely,

Mark Ashley
Geologist

xc: OCD Aztec Office

Mark Ashley

From: Mark Ashley on behalf of Ashley, Mark
Sent: Wednesday, March 04, 1998 3:19 PM
To: Foust, Denny
Subject: Giant-bloomfield
Importance: High

Denny,
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Mr. Lynn Shelton
Environmental Manager
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P.O. Box 159
Bloomfield, NM 87413

**RE: Remediation Plan for the River Bank Contamination
Bloomfield Refinery (GW-001)
San Juan County, New Mexico**

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If you have any questions, please call me at (505) 827-7155.

Sincerely,

Mark Ashley
Geologist

xc: OCD Aztec Office

Mark Ashley

From: Foust, Denny
Sent: Thursday, March 05, 1998 8:51 AM
To: Ashley, Mark
Subject: RE: Giant-Bloomfield

-----Original Message-----

From: Ashley, Mark
Sent: Monday, March 02, 1998 11:14 AM
To: Foust, Denny
Subject: Giant-Bloomfield
Importance: High

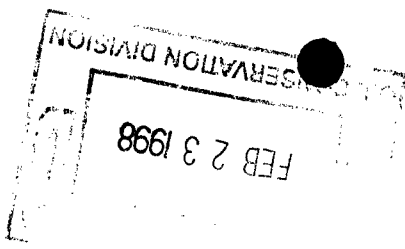
Denny,
Please send me any comments you have on the remediation plan for the river bank contamination. If you could get them to me by Wednesday (3-4-98) I would appreciate it.
Thanks,
Mark

I HAVE NO PROBLEM WITH GIANT'S PROPOSAL FOR REMEDIATION OF CONTAMINATION ALONG THE SAN JUAN RIVER. PLEASE NOTE THIS MAY BE EXCESSIVELY EXPENSIVE AND WILL RESULT IN A BUILD-UP OF HYDRAULIC HEAD BEHIND THE SHEET PILING IMPEREABLE BARRIER. A METHOD OF RELIEVING THIS HYDRAULIC HEAD MUST BE ADDRESSED ALONG WITH INSTALLATION OF THE SHEET PILING IMPERMEABLE BARRIER. I BELIEVE FERTILIZER OR OXIDIZERS MUST BE APPLIED DIRECTLY TO THE CONTAMINATION THROUGH INJECTION--I DO'NT SEE FERTILIZER APPLICATIONS TO THE SURFACE ACCOMPLISHING VERY MUCH.

Mark Ashley

From: Mark Ashley on behalf of Ashley, Mark
Sent: Monday, March 02, 1998 11:10 AM
To: Foust, Denny
Subject: Giant-Bloomfield
Importance: High

Denny,
Please send me any comments you have on the remediation plan for the river bank contamination. If you could get them to me by Wednesday (3-4-98) I would appreciate it.
Thanks,
Mark



50 Road 4990
P.O. Box 159
Bloomfield, New Mexico 87413
505
632-8013

February 17, 1998

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
2040 south Pacheco
Santa Fe, New Mexico 87505

Re: River Bank Remediation Plan Giant Refining Company - Bloomfield
GW-001

Dear Mr. Anderson:

Giant Refining Company - Bloomfield submits the proposed remediation plan for the contamination discovered on the river bank area where Giant's property borders the San Juan River.

If you have any questions, please contact me at (505) 632 8013.

Sincerely:

Lynn Shelton
Environmental Manager
Giant Refining Company - Bloomfield

TLS/tls

Enclosure

cc: John Stokes, Refinery Manager
Warren Arthur, USEPA, Region VI
Benito Garcia, NMED/HRMB
Denny Foust, NMOCD - Aztec

REMEDIATION PLAN
FOR THE
RIVER BANK CONTAMINATION

GIANT REFINING COMPANY
BLOOMFIELD
GW-001

PREPARED FOR:
NEW MEXICO OIL CONSERVATION DIVISION

PREPARED BY:
LYNN SHELTON
ENVIRONMENTAL MANAGER

FEBRUARY, 1998

REMEDATION PLAN FOR THE RIVER BANK CONTAMINATION

GIANT REFINING COMPANY - BLOOMFIELD

FEBRUARY, 1998

GENERAL:

As described in the June, 1997 **RIVER BANK INVESTIGATION** report, an area of hydrocarbon contamination was discovered on the river bank of the San Juan River (the river) at this facility. A complete characterization program was performed to document the extent of the hydrocarbon contamination. Mitigation activities have continued at the site and have included: recovery of separate phase hydrocarbon (SPH), bi-weekly monitoring (for BTEX constituents) of the river in the area behind the containment boom, and recovery of separate phase hydrocarbon within the area of the refining facility in order to prevent additional contamination from migrating to the river bank.

Recovery of SPH at the river bank continued through March, 1997. In February, 1997, the flow rate of the river was returned to ~ 500+ cubic feet per second (cfs) from the low flow test in which the river was limited to 250 cfs for a period of four months. It is assumed that the low flow will not occur again as a test, although low flow can occur as a result of long term drought conditions. As a result of the return to normal flow of the river (~500cfs), SPH was no longer observed in the collection gallery installed near the river. Although recovery equipment has been left in place, no SPH has been seen or recovered since March, 1997.

As stated in the **RIVER BANK INVESTIGATION** report, the low flow conditions appeared to have lowered the hydraulic barrier of the river sufficiently to allow SPH, that was held as bank storage, to migrate west to the river and create the sheen.

Several remediation techniques have been explored in order to determine the most effective remediation program for protection of the river. To be successful, any remediation activity must be performed in concert with the recovery and management of the SPH plume located on top of the bluff and immediately below part of the Giant facility.

SITE SPECIFIC PROPOSAL:

Phase I

The first part (or phase) of a remedial program must be to create an impermeable barrier between the contaminated area and the river. Although the migration of the SPH seems to be inhibited by the normal flow of the river, it is always possible that the low flow condition (<300 cfs) may occur due to additional flow tests or as the result of long term drought conditions. Should low flow conditions exist for an extended period of time, it is

likely that, if SPH is still present and until the hydrocarbon contamination is mitigated, additional migration of SPH may occur.

Giant proposes to install an impermeable wall using sheet pilings. Specifically, an impermeable wall of high density polyethylene from Materials International (4501 Circle 75 Parkway, Atlanta, Georgia), brand name Shore Guard SG500, will be installed. A special sealant will be applied to interlocking seams to assure impermeability. The sheet pilings will be installed 5-10 feet from the edge of the river to minimize or eliminate impact to the river during installation.

The sheet piles will be ~22 feet long and will be driven into place with a crane mounted, hydraulically driven vibratory hammer. The plastic sheets will be supported during installation by a hardened steel mandrel. The sheets will be driven through the fluvials into the Nacimiento Formation. As the sheets are interlocking, an impermeable barrier will be created to prevent horizontal migration and the Nacimiento Formation is a natural barrier to vertical migration.

The sheet piling will be installed around the perimeter of the river bank to the outlet of the water make-up ponds, then south along the west edge of the make-up pond and then east to the east edge of the makeup pond. This will surround the contaminated soil and effectively prevent any migration of contaminants to the river. As the surface of the Nacimiento Formation dips to the north-northwest, this, again, provides adequate protection for the river from migration of contaminants.

A site drawing as well as a detail of the river bank are included as Attachment I and the extent of the sheet piling is marked for your reference.

The sheet piling, at ~22 feet, is of sufficient length to tie into the Nacimiento Formation and will be finished in height above the ground surface to allow a level surface across the entire river bank area.

Phase II

Because the installation of the sheet piling will provide an impermeable barrier that will prevent migration of contamination of the river and due to the fact that no SPH had been observed or recovered since March, 1997, Giant proposes to use in-situ remediation, with stimulated bio-remediation to enhance bio-degradation and subsequent cleanup of the hydrocarbon contaminated soil.

After installation of the impermeable barrier, Giant will backfill the low areas on the western part of the river bank with clean soil to establish a level grade across the river bank area. Giant will then plow or disc the hydrocarbon contaminated area and apply nitrogen/phosphorus rich fertilizer to the affected area. Fertilizer applications will be transported down to the contamination by percolation. Giant will then plow or disc the affected area monthly to provide additional oxygen and to control vegetation growth. Giant plans to apply fertilizer twice annually during the warm months between April and October. Additions of

nitrogen/phosphorus rich fertilizer will serve as a stimulant for bacterial growth. Applications of the fertilizer will not affect the river because of the impermeable barrier.

Additionally, a monitor well will be installed as close to the current recovery culvert* as is safely possible, allowing room for sloughing or sliding of the talus slope to occur without damage to the well (see detail map for wellsite). This well will be monitored monthly with an interface probe to determine if SPH is present. Although Giant believes that most of the SPH has been recovered, if SPH is observed, collection of SPH will commence through the monitor well. If sufficient SPH is present, a collection gallery may need to be installed to recover the SPH. The need for this could be discussed between Giant and the OCD if a considerable volume of SPH is determined to be present. If no SPH is detected for one year, or after SPH recovery is abandoned, Giant will monitor the water in the monitor well for BTEX constituents quarterly until those constituents diminish to below WQCC standards. Quarterly progress reports will be submitted to OCD at that time to inform the OCD of the progress being made by the remediation efforts. When BTEX levels fall below WQCC standards, the river bank area will be considered clean and remediation and sampling activities will cease at that time.

In addition to the remediation activities on the river bank, Giant will continue to maximize product recovery from the plume beneath part of the refinery on top of the bluff. Upon approval of the Corrective Measures Study, an enhanced recovery system will be installed in order to expedite recovery of the SPH plume and cleanup of the Jackson Lake Terrace Formation. As this plume is considered to be the source of the contamination on the river bank, recovery activities will preclude the possibility of additional SPH from migrating to the river bank.

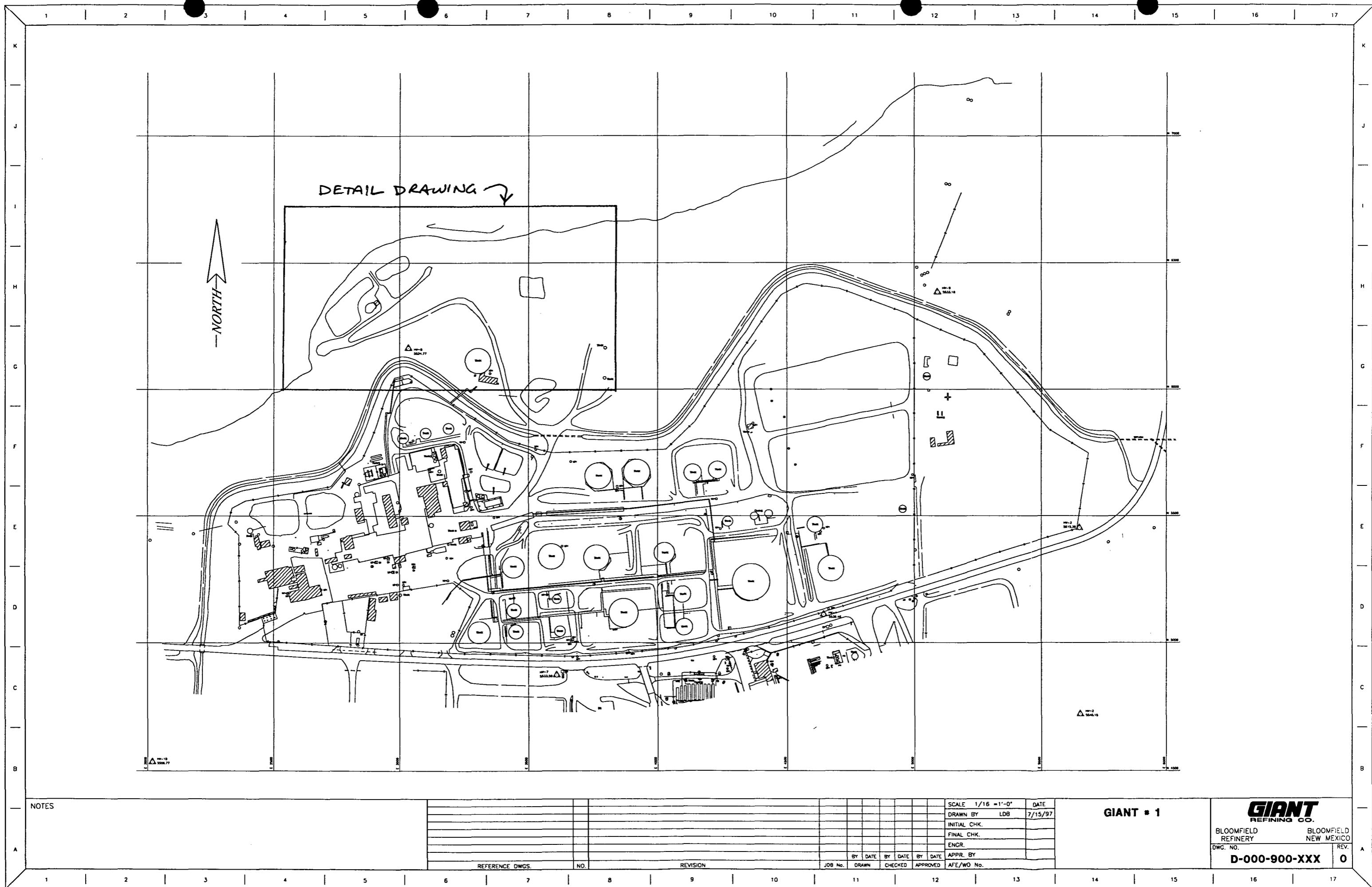
INSTALLATION:

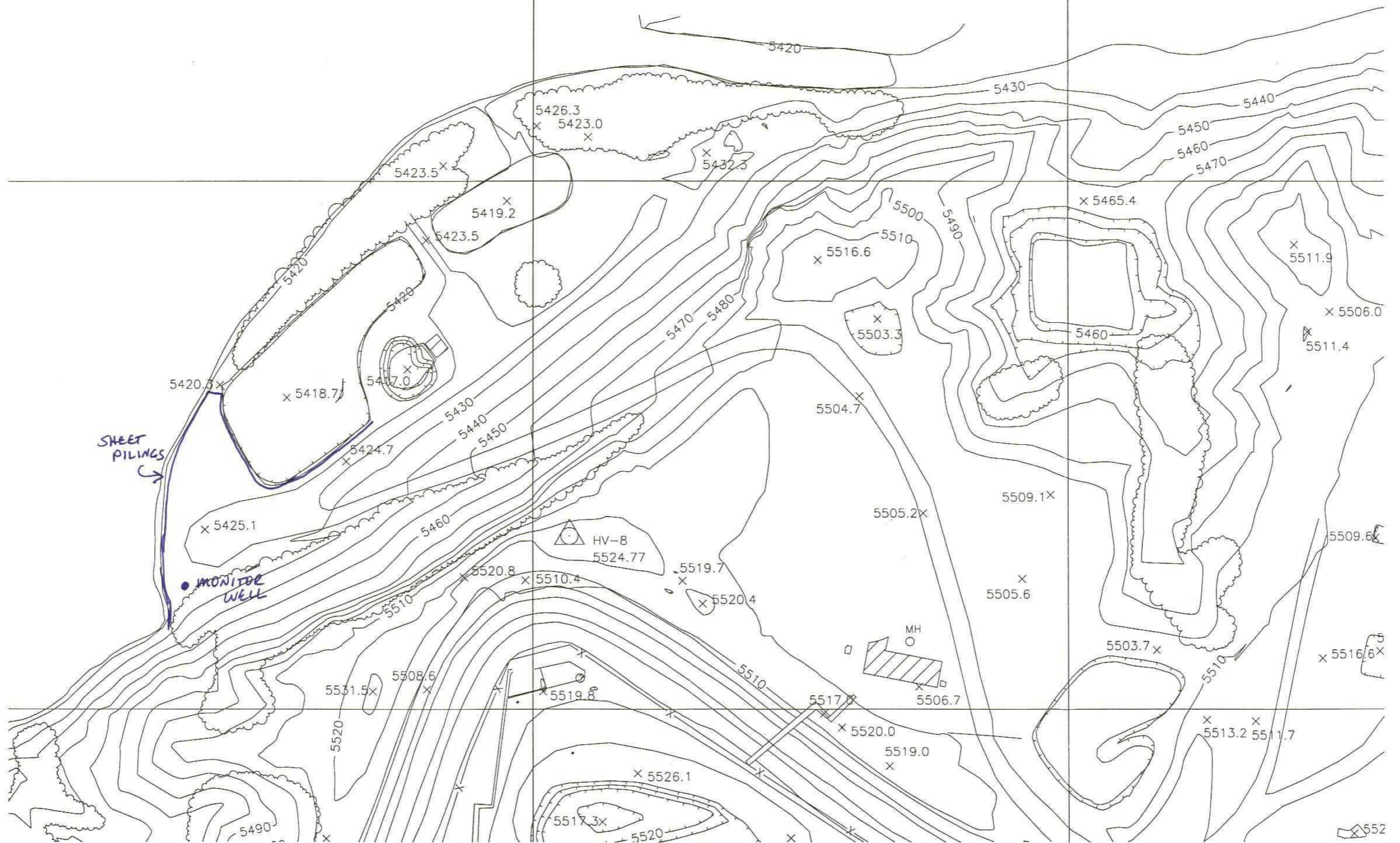
Giant proposes to install the impermeable barrier, assuming approval of this remediation plan by OCD, in June or July 1998. Immediately after completion of the impermeable barrier, the river bank area will be backfilled as needed, leveled and then plowed or disced. The monitor well will be installed at that time.

This timetable provides the quickest assurance that no contamination can reach the river and provides the best assurance that the environment and human health are protected.

*The existing collection culverts will be removed because sloughing of the talus slope threatens to cover them up.

ATTACHMENT I



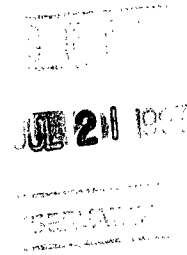


MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 4:00 PM	Date 10.29.97
<u>Originating Party</u> MARK ASHLEY		<u>Other Parties</u> LYNN SHELTON
<u>Subject</u> RIVER BANK INVESTIGATION		
<u>Discussion</u> I ASKED LYNN TO REVIEW THE INVESTIGATION AND WHERE TO GO FROM HERE.		
<u>Conclusions or Agreements</u> HE IS WAITING ON 30 STUDY, AND THEN HE WILL SUBMIT A REMEDIATION PLAN		
<u>Distribution</u>	Signed Mark Ashley	



50 Road 4990
P.O. Box 159
Bloomfield, New Mexico 87413
505
632-8013



July 16, 1997

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Bi-Weekly Report Giant Refining Company - Bloomfield
GW-001

Dear Mr. Anderson:

Giant Refining Company - Bloomfield submits the bi-weekly report on activities associated with the river terrace at this facility.

No additional activities have been performed or data received.

Sincerely:

A handwritten signature in cursive script, reading "Lynn Shelton". The signature is fluid and stylized, with a prominent loop at the end.

Lynn Shelton
Environmental Manager
Giant Refining Company - Bloomfield

TLS/tls

Enclosure

cc: John Stokes, Refinery Manager
Kathleen O'Leary, Regulatory Affairs Coordinator
Greg Lyssy, Region VI USEPA
Steve Pullen, NMED / HRMB