

GW - 32

**GENERAL
CORRESPONDENCE**

YEAR(S):

JUL 96 → JUL 95



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

AZTEC DISTRICT OFFICE
1000 RIO BRAZOS ROAD
AZTEC, NEW MEXICO 87410
(505) 334-6178 Fax (505)334-6170

GARY E. JOHNSON
GOVERNOR

JENNIFER A. SALISBURY
CABINET SECRETARY

July 11, 1996

RECEIVED

JUL 15 1996

Environmental Bureau
Oil Conservation Division

Rex Eberly
Ballou Construction Company Incorporated
PO Box 2300
Salina KS 67402-2300

Re: Using Refinery Waste Water for Road Construction

Dear Mr. Eberly:

I have received your letter dated July 11, 1996, requesting authorization to use approximately 75,000 gallons of refinery wastewater from ponds #2, #11, and #12 at Giant Refinery for construction on Interstate 40.

You may use this water as proposed with the following conditions:

1. The water will be applied so that no excess water runs off into roadside ditches or into any watercourse.
2. At the end of each day's activity, unused water will be stored in trucks or tanks so the water does not drip or drain onto the ground overnight. Alternatively, the water may be returned to the Giant ponds if no other material has been added to the water intentionally, or accidentally mixed with liquids that were previously contained in the truck or tank.

This approval does not relieve you of liability should your operation result in actual pollution of surface waters, ground waters, or the environment that may be actionable under other laws and/or regulations. In addition, this approval does not relieve you of responsibility for compliance with other county, state, federal, or tribal laws and/or regulations.

Sincerely,

Frank T. Chavez
District Supervisor

FTC\sh

cc: Roger Anderson - Santa Fe/
Giant Refinery, Ciniza
Denny Foust, District Environmentalist

Pat Sanchez

From: Denny Foust
Sent: Monday, July 15, 1996 7:13 AM
To: Pat Sanchez
Subject: Registered: Denny Foust

Your message

To: Denny Foust
Subject: GIANT CINIZA RENEWAL LETTER -DRAFT
Sent: 7/11/96 2:55:00 PM

was read on 7/15/96 7:13:00 AM

7-15-96 (by Phone)
talked to Denny
at 9:30 AM regarding
the Ciniza Renewal
- He said He had
no comments.

Pat Sanchez

From: System Administrator
Sent: Thursday, July 11, 1996 2:55 PM
To: Denny Foust
Subject: Delivered: GIANT CINIZA RENEWAL LETTER -DRAFT
Importance: High

Your message

To: Denny Foust
Subject: GIANT CINIZA RENEWAL LETTER -DRAFT
Sent: 7/11/96 2:55:51 PM

was delivered to the following recipient(s):

Denny Foust on 7/11/96 2:55:53 PM

Pat Sanchez

From: Pat Sanchez
Sent: Thursday, July 11, 1996 2:55 PM
To: Denny Foust
Subject: GIANT CINIZA RENEWAL LETTER -DRAFT
Importance: High
Sensitivity: Confidential

DENNY, PLEASE REVIEW AND PROVIDE COMMENTS BY 8:00 AM ON MONDAY JULY 15,1996 BY E-MAIL
THANKS !!!!! PAT SANCHEZ



Gw9632.ren

Pat Sanchez

From: System Administrator
Sent: Thursday, July 11, 1996 9:49 AM
To: Denny Foust
Subject: Delivered: Giant Ciniza GW-032 Discharge Plan Renewal.
Importance: High

Your message

To: Denny Foust
Subject: Giant Ciniza GW-032 Discharge Plan Renewal.
Sent: 7/11/96 9:49:32 AM

was delivered to the following recipient(s):

Denny Foust on 7/11/96 9:49:36 AM

Pat Sanchez

From: Pat Sanchez
Sent: Thursday, July 11, 1996 9:49 AM
To: Denny Foust
Subject: Giant Ciniza GW-032 Discharge Plan Renewal.
Importance: High
Sensitivity: Confidential

Denny, I am in the process of writing the permit renewal for Ciniza, if you have any further comments please let me know in E-mail writing by Monday morning at 8:00 AM.

Thanks!! Pat Sanchez

Pat Sanchez

From: Denny Foust

Sent: Monday, July 15, 1996 7:13 AM
To: Pat Sanchez
Subject: Registered: Denny Foust

Your message

To: Denny Foust
Subject: Giant Ciniza GW-032 Discharge Plan Renewal.
Sent: 7/11/96 9:49:00 AM

was read on 7/15/96 7:13:00 AM

Pat Sanchez

Record# NAME
254 FOUST

DATE TRIP
06/28/96

COMMENT 2
CINIZA REFINERY MEETING WITH ED HORST, DAVE PAVLICH AND STEVE MORRIS. THE LANDFARM ON THE REFINERY GROUNDS IS INSPECTED DAILY BY THE ENVIRONMENTAL STAFF, AN ATTENDANT IS ON DUTY FOR RECEIVING OFFSITE SHIPMENTS. THERE IS CURRENTLY AN AREA CONSTRAINT PROBLEM AS A RESULT OFFSITE SHIPMENTS HAVE BEEN STOPPED. GIANT IS HAVING TROUBLE DROPPING TPH BELOW REMEDIATION STANDARDS. GIANT HAS AN INTERNAL PERMITTING CHECK-OFF AND SIGN PERMITTING PROCEDURE IN PLACE FOR THE LANDFARM. A SIGN IS IN PLACE ON THE LANDFARM AND REGULAR CULTIVATING IS TAKING PLACE. EVAPORATION PONDS ARE LOW AND SHOULD HAVE PLENTY OF ROOM, NO DISCHARGE TO TEMPORARY PONDS. LAB PROCEDURES HAVE TIGHTENED UP, ELIMINATED A SIGNIFICANT VOLUME OF CHEMICALS ONSITE. A PAD IS PROJECTED FOR BULK ITEMS STORED OUTSIDE. TEMPORARY PERSONNEL OFFICES NOW BEHIND THE LAB. WASTE STREAM FROM LAB HAS BEEN SIGNIFICANTLY ALTERED IN CHARACTER TO BECOME COMPATIBLE WITH DISPOSAL IN API SEPARATOR. EPNG BLUEWATER STATION AT THOREAU NEEDS SIGN, DISCHARGE PLAN. R J ENTERPRISES NOSE ROCK EVAP POND, A-16-20N-12W, THE SMALL 50'X50' PND IS 25% COVERED BY OIL EMULSION AND ALGAE.

RECEIVED
JUL 11 1996
Environmental Bureau
Oil Conservation Division



STATE OF NEW MEXICO
 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
 SANTA FE, NEW MEXICO 87505
 (505) 827-7131

July 9, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-594-835-276

Mr. Edward L. Horst
 Environmental Manager
 Giant Refining - Ciniza
 Route 3, Box 7
 Gallup, NM 87301

RE: CAP-SWMU#6/TANK 569
 Recovery well sampling
 Giant Ciniza Refinery - GW-032

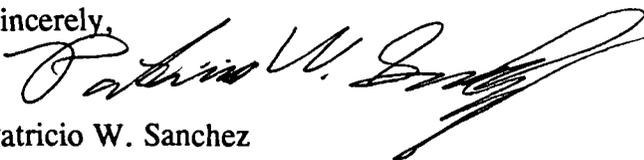
Dear Mr. Horst:

The New Mexico Oil Conservation Division (OCD) has received Giant's letter and "Corrective action Plan dated April 15, 1996, Clarification on OCD Requirements." dated July 4, 1996 (see attachment). The OCD (Pat Sanchez) and NMED HRMB (Bob Sweeney) have met to discuss the previously requested sampling of the two proposed recovery wells B-2 and BG-4. Upon review of sample analysis that OCD obtained as part of the discharge plan renewal process and discussion of the plant waste water handling system and the disposal of API separator sludge - the OCD will not require that the two recovery wells be sampled at this time. Giant may begin free product recovery as previously approved by the OCD on May 8, 1996 .

Giant will however propose the appropriate constituents of concern based upon process knowledge and the appropriate skinner list constituents cross referenced with WQCC constituents for the monitor wells that will be utilized and/or installed as part of the CAP for the area of concern.

Note, that OCD direction does not relieve Giant of liability should operations at Ciniza result in contamination of surface waters, ground waters or the environment which is a result of this directive. In addition, OCD direction does not relieve Giant of responsibility for compliance with any other Federal, State, or local laws and/or regulations.

Sincerely,


 Patricio W. Sanchez
 Petroleum Engineer

xc: Mr. Denny Foust - NMOCD, Mr. Bob Sweeney - NMED, HRMB
 Attachment

US Postal Service
 Receipt for Certified Mail
 No insurance Coverage Provided. CAP CINIZA, NM
 Do not use for International Mail (See reverse)

Sent to: Giant Refining - Ed Horst
 Street & Number: Route 3 Box 7
 Post Office, State, & ZIP Code: Gallup, NM 87301

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



OIL CONSERVATION DIVISION

RECEIVED

Route 3, Box 7
Gallup, New Mexico
87302

505
722-3833

July 4, 1996

Mr. Patricio W. Sanchez
Petroleum Engineer
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

RECEIVED

JUL 08 1996

Environmental Bureau
Oil Conservation Division

Dear Mr. Sanchez:

SUBJECT: CORRECTIVE ACTION PLAN DATED APRIL 15, 1996,
CLARIFICATION ON OCD REQUIREMENTS.

Giant Refining Company is in receipt of the Oil Conservation Division (OCD)'s letter dated June 20, 1996, and is requesting clarification on one of the requirements. In the first bullet OCD is requiring Giant to sample recovery water from the two proposed recovery wells. Collected samples would then be analyzed for constituents of concern set out in WQCC Regulations Section 3103 A, B, and C. In checking with Giant's contracting analytical laboratory, it appears as though 24 sample bottles for each well would be required to analyze for the constituents of concern at a cost of \$2,000 to \$2,500 per well. Giant feels that since they know the source of contamination, sampling the recovery water from the wells and analyzing for benzene, toluene, ethylbenzene, xylene (BTEX) and lead constituents would properly characterize the well water.

If you are in agreement with this approach please acknowledge by signing in the space(s) provided below and returning one fully executed original to me. If there are any questions or comments that you feel should be included please contact me at (505)722-0227.

Signature: _____

Date: _____

Signature: _____

Date: _____

Sincerely,

Edward L. Horst, Environmental Manager
Giant Refining Company
Ciniza Refinery



July 4, 1996

Route 3, Box 7
Gallup, New Mexico
87301

Mr. Patricio W. Sanchez
Petroleum Engineer
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

RECEIVED

JUL 08 1996

Environmental Bureau
Oil Conservation Division

Dear Mr. Sanchez:

SUBJECT: CORRECTIVE ACTION PLAN DATED APRIL 15, 1996,
CLARIFICATION ON OCD REQUIREMENTS.

Giant Refining Company is in receipt of the Oil Conservation Division (OCD)'s letter dated June 20, 1996, and is requesting clarification on one of the requirements. In the first bullet OCD is requiring Giant to sample recovery water from the two proposed recovery wells. Collected samples would then be analyzed for constituents of concern set out in WQCC Regulations Section 3103 A, B, and C. In checking with Giant's contracting analytical laboratory, it appears as though 24 sample bottles for each well would be required to analyze for the constituents of concern at a cost of \$2,000 to \$2,500 per well. Giant feels that since they know the source of contamination, sampling the recovery water from the wells and analyzing for benzene, toluene, ethylbenzene, xylene (BTEX) and lead constituents would properly characterize the well water.

If you are in agreement with this approach please acknowledge by signing in the space(s) provided below and returning one fully executed original to me. If there are any questions or comments that you feel should be included please contact me at (505)722-0227.

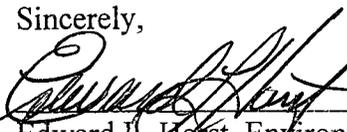
Signature: _____

Date: _____

Signature: _____

Date: _____

Sincerely,


Edward U. Horst, Environmental Manager
Giant Refining Company
Ciniza Refinery



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 28, 1995

Mr. David C. Pavlich
Health, Safety and Environmental Manager
Giant Refining Company
Route 3, Box 7
Gallup, NM 87301

RECEIVED

JUL 08 1996

Environmental Bureau
Oil Conservation Division

Dear Mr. Pavlich,

RE: Approval of Class I Permit Modification to Part A

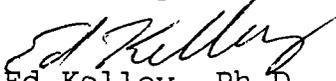
The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) is in receipt of the October 9, 1995 letter from Giant Refining Company (Giant) containing the permit modification fee assessed in HRMB's September 20, 1995 letter to Giant.

HRMB has completed a review of the request for administrative completeness and found it to be complete. NMED hereby approves the Class I permit modification to Giant's Part A Permit. The effective date of approval is Giant's date of receipt of this letter. The new Part A will be incorporated into Giant's operational Permit EPA ID # 000333211. Giant is required to incorporate the enclosed copy in Giant's copy of the operating Permit originally issued by NMED. Further, Giant is required to send a notice of the modification to all persons on the facility mailing list which is enclosed. This notification must be made within 90 (ninety) calendar days after the change is put into effect in compliance with 20 NMAC 4.1, Subpart IX, 40 CFR § 270.42(a)(ii).

Mr. David C. Pavlich
November 28, 1995
Page 2 of 2

If there are any questions please feel free to contact either
Barbara Hoditschek or Michael Chacón at (505) 827-1561.

Sincerely,



Ed Kelley, Ph.D.
Director, Water and Waste Management Division

Enclosure

cc: David Neleigh, EPA (6H-PN)
Benito J. Garcia, Chief, HRMB
Barbara Hoditschek, RCRA Program Manager
Bob Sweeney, RCRA TCP
File-Reading and Red 95



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

September 20, 1995

Mr. David C. Pavlich
Health, Safety and Environmental Manager
Giant Refining Company
Route 3, Box 7
Gallup, NM 87301

RECEIVED

JUL 08 1996

Environmental Bureau
Oil Conservation Division

Dear Mr. Pavlich,

RE: Permit Modification Request

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) is in receipt of the August 25, 1995 modification request submitted by Giant Refining Company (Giant) for a revision of Giant's Part A Permit. Specifically, this request is to remove three (3) non-RCRA units from the Part A Permit, and is in response to the August 14, 1995 request by the Director of NMED Water and Waste Management Division (WWD) for a revised Part A submission by Giant.

HRMB has reviewed the request for administrative completeness and class determination. NMED has found the modification to be a Class I. The New Mexico Hazardous Waste Fee Regulations (EIB/HWFR-1) require the assessment of permit fees for permit modifications. Permit modifications classified as minor by the Hazardous Waste Management Regulations (which includes Giant's Class I Modification request) are subject to a fee of one thousand dollars (\$1,000.00).

Please send payment by check made out to **NMED Hazardous Waste Permit Fees**, and send by **Certified Mail** to:

Ms. Chika Ezeanyim
N.M. Environment Department
Hazardous and Radioactive Materials Bureau
2044 Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502

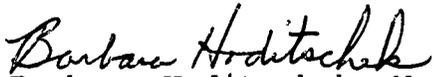
After HRMB has received the permit modification fee, NMED will process your request for the Class I modification. Giant will then receive a letter of notification and a mailing list of persons to

Mr. David C. Pavlich
September 20, 1995
Page 2 of 2

be informed of the modification. Giant is required to do this within 90 calendar days of making the modification, as per 20 NMAC 4.1 Subpart IX, 40 CFR §270.42(a)(ii).

If there are any questions on this matter, you may contact Mr. Michael Chacón of my staff at (505) 827-1561.

Sincerely,



Barbara Hoditschek, Manager
RCRA Permits Program
Hazardous and Radioactive Materials Bureau

cc:
David Neleigh, EPA
Bob Sweeney, HRMB TCP
File-Red 95 & RCRA Reading File

GIANT
REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

August 25, 1995

Mr. Benito J. Garcia, Chief
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
525 Camino De Los Marquez
Santa Fe, New Mexico 87502

RECEIVED

JUL 08 1996

Environmental Bureau
Oil Conservation Division

Via: **CERTIFIED MAIL**
RETURN RECEIPT REQUESTED

Re: **Giant Refining - Ciniza Refinery**
RCRA Operating Permit NMD000333211-2
Class I Permit Modification Request

Dear Mr. Garcia:

Giant Refining Company currently operates its Ciniza refinery under the RCRA Hazardous Waste Facility Permit referenced above (last revision approved via EPA correspondence dated August 16, 1991). During recent discussions with the staff members of the Hazardous & Radioactive Materials Bureau (HRMB), it was discovered that several items currently listed in this facility's RCRA Part A permit have either never been constructed or fall under the jurisdiction of the New Mexico Oil Conservation Division (OCD) and are regulated under this facility's OCD Discharge Plan (GW-032).

In subsequent correspondence, HRMB directed Giant to contact Mr. Ed Kelley, Director of the NMED's Water and Waste Management Division (WWD) to request approval for the removal of these inappropriately listed items from this facility's Part A permit. This request was complied with in correspondence submitted to Mr. Kelley's office on July 24 and July 28, 1995. On August 21, 1995, Giant received WWD's approval of this deletion request in a letter from Mr. Kelley dated August 14, 1995 (copy enclosed).

Therefore, Giant Refining hereby requests a Class I modification to its RCRA Part A Permit #NMD000333211-2 deleting the following items:

- the API separator
- the benzene strippers
- the hazardous waste drum storage area

The first two items are being requested for deletion from the permit due to the fact that they are already regulated under this facility's OCD discharge plan. The third item is being proposed for deletion because it was never constructed, and Giant has no plans for its construction in the future.

Enclosed with this letter are a completed Part A Hazardous Waste Permit Application reflecting the above modifications, a location map, a facility site plan, and a photocopy of an aerial view of the facility site.

Should you or your staff have any questions regarding the above, please do not hesitate to contact me or Lynn Shelton at (505) 722-3833.

Sincerely,

David C. Pavlich

David C. Pavlich
Health, Safety, and Environmental Manager

cc: Kim Bullerdick, Corporate Counsel
Giant Industries Arizona, Inc.

Lynn Shelton, Senior Environmental Coordinator
Giant Refining Company

WWT File

RCRA Permit Binder

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



GARY E. JOHNSON
GOVERNOR

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

RECEIVED

JUL 0 8 1996

Environmental Bureau
Oil Conservation Division

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.

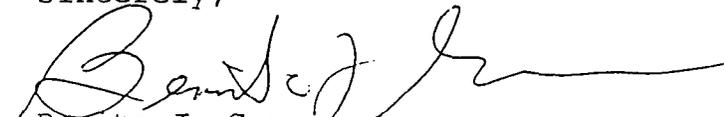
John Stokes
July 13, 1995
Page 2 of 2

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

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
N M D 0 0 0 3 3 3 2 1 1	

VII. Operator Information (See instructions)

Name of Operator													
G I A N T R E F I N I N G C O M P A N Y C I N I Z A													
Street or P.O. Box													
R O U T E 3 B O X 7													
City or Town										State		ZIP Code	
G A L L U P										N M		8 7 3 0 1 -	
Phone Number (Area Code and Number)								B. Operator Type		C. Change of Operator Indicator		Date Changed	
5 0 5 - 7 2 2 - 3 8 3 3								P		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Month Day Year	

VIII. Facility Owner (See Instructions)

A. Name of Facility's Legal Owner													
G I A N T I N D U S T R I E S A R I Z O N A I N C													
Street or P.O. Box													
2 3 7 3 3 N O R T H S C O T T S D A L E R O A D													
City or Town										State		ZIP Code	
S C O T T S D A L E										A Z		8 5 2 5 5 -	
Phone Number (Area Code and Number)								B. Owner Type		C. Change of Owner Indicator		Date Changed	
6 0 2 - 5 8 5 - 8 8 8 8								P		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Month Day Year	

IX. SIC Codes (4-digit, in order of significance)

Primary				Secondary				
2	9	1	1	(Description)	PETROLEUM REFINING			(Description)
Secondary				Secondary				
(Description)				(Description)				

X. Other Environmental Permits (See Instructions)

A. Permit Type (Enter code)	B. Permit Number	C. Description
R	N M D 0 0 0 3 3 3 2 1 1	RCRA PART B PERMIT
E	A Q P 6 3 3 - M - 2	NM AIR QUALITY PERMIT
N	N M R 0 0 A 1 7 2	GENERAL NPDES STORMWATER
E	G W - 3 2	NMOC DISCHARGE PLAN

EPA ID Number (Enter from page 1)	Secondary ID Number (Enter from page 1)																								
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">N</td><td style="width:10%;">M</td><td style="width:10%;">D</td><td style="width:10%;">0</td><td style="width:10%;">0</td><td style="width:10%;">0</td><td style="width:10%;">3</td><td style="width:10%;">3</td><td style="width:10%;">3</td><td style="width:10%;">2</td><td style="width:10%;">1</td><td style="width:10%;">1</td> </tr> </table>	N	M	D	0	0	0	3	3	3	2	1	1	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%; height: 20px;"></td><td style="width:10%;"></td><td style="width:10%;"></td> </tr> </table>												
N	M	D	0	0	0	3	3	3	2	1	1														

XI. Nature of Business (Provide a brief description)

The Giant-Ciniza Plant refines crude oil and markets refined petroleum fuel products.

XII. Process Codes and Design Capacities

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

- AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
- UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	
	<u>Disposal:</u>					
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	} Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
D80	Landfill	Acre-feet or Hectare-meter	T88	Titanium Dioxide Chloride Process Oxidation Reactor		
D81	Land Treatment	Acres or Hectares	T89	Methane Reforming Furnace		
D82	Ocean Disposal	Gallons Per Day r Liters Per Day	T90	Pulping Liquor Recovery Furnace		
D83	Surface Impoundment	Gallons or Liters	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid		
D99	Other Disposal	Any Unit of Measure Listed Below	T92	Halogen Acid Furnaces		
	<u>Storage:</u>		T93	Other Industrial Furnaces Listed In 40 CFR §260.10		
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters	T94	Containment Building-Treatment		Cubic Yards or Cubic Meters
S02	Tank	Gallons or Liters		<u>Miscellaneous (Subpart XI):</u>		
S03	Waste Pile	Cubic Yards or Cubic Meters	X01	Open Burning/Open Detonation		Any Unit of Measure Listed Below
S04	Surface Impoundment	Gallons or Liters	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour	
S05	Drip Pad	Gallons or Liters	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
S06	Containment Building-Storage	Cubic Yards or Cubic Meters	X04	Geologic Repository	Cubic Yards or Cubic Meters	
S99	Other Storage	Any Unit of Measure Listed Below	X99	Other Subpart X	Any Unit of Measure Listed Below	
	<u>Treatment:</u>					
T01	Tank	Gallons Per Day or Liters Per Day				
T02	Surface Impoundment	Gallons Per Day or Liters Per Day				
T03	Inclinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour				
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour				
T80	Boiler	Gallons or Liters				
T81	Cement Kiln	} Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour				
T82	Lime Kiln					
T83	Aggregate Kiln					
T84	Phosphate Kiln					
T85	Coke Oven					
T86	Blast Furnace					

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	O
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
				Btu's Per Hour	I

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
N M D O O O 3 3 3 2 1 1	

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only			
					1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>					
X 1	S	0	2		5 3 3 7 8 8	G	0 0 1				
1	D	8	1		15 0	B	001				
2	T	0	4		300 0	U	001				
3					.						
4					.						
5					.						
6					.						
7					.						
8					.						
9					.						
1 0					.						
1 1					.						
1 2					.						
1 3					.						

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number <small>(Enter #s in seg w/XII)</small>	A. Process Code <small>(From list above)</small>				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
					1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>		
X 1	T	0	4					In-situ Vitrification
1	T	0	4		300 0	U	001	FILTER PRESS
2								
3								
4								

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

N M D O O O 3 3 3 2 1 1

XIV. Description of Hazardous Wastes

- A. **EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. **ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. **UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of item XIV-D(1).
3. Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS	
				(1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
N	M	D	0	0	0	3	3	3	2	1	1												

XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES															
								(1) PROCESS CODES (Enter code)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))										
1	K	0	4	9	0.4	T	T	0	4	S	0	1											FILTER PRESS
2	K	0	5	0	5.0	T	T	0	4	S	0	1											FILTER PRESS
3	K	0	5	1	250.0	T	T	0	4	S	0	1											FILTER PRESS
4	K	0	5	2	10.0	T	T	0	4	S	0	1											FILTER PRESS
5	D	0	1	8	200.0	T	S	0	1	D	8	1											
6	D	0	0	1	1.0	T	S	0	1														
7	D	0	3	9	1.0	T	S	0	1														
8	F	0	3	7	5.0	T	T	0	4	S	0	1	D	8	1								FILTER PRESS
9																							
10																							
11																							
12																							
13																							
14																							
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33																							

EPA I.D. Number (Enter from page 1) <table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <tr> <td>N</td><td>M</td><td>D</td><td>0</td><td>0</td><td>0</td><td>3</td><td>3</td><td>3</td><td>2</td><td>1</td><td>1</td> </tr> </table>	N	M	D	0	0	0	3	3	3	2	1	1	Secondary ID Number (Enter from page 1) <table border="1" style="width:100%; border-collapse: collapse; height: 20px;"> <tr> <td> </td><td> </td> </tr> </table>																				
N	M	D	0	0	0	3	3	3	2	1	1																						

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

* SEE ATTACHMENT A

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

* SEE ATTACHMENT B

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

* SEE ATTACHMENT C

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature	Date Signed
 Name and Official Title (Type or print) JOHN STOKES, REFINERY MANAGER	8/25/95
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
 Name and Official Title (Type or print) JOHN STOKES, REFINERY MANAGER	8/25/95
Operator Signature	Date Signed
Name and Official Title (Type or print)	

XIX. Comments

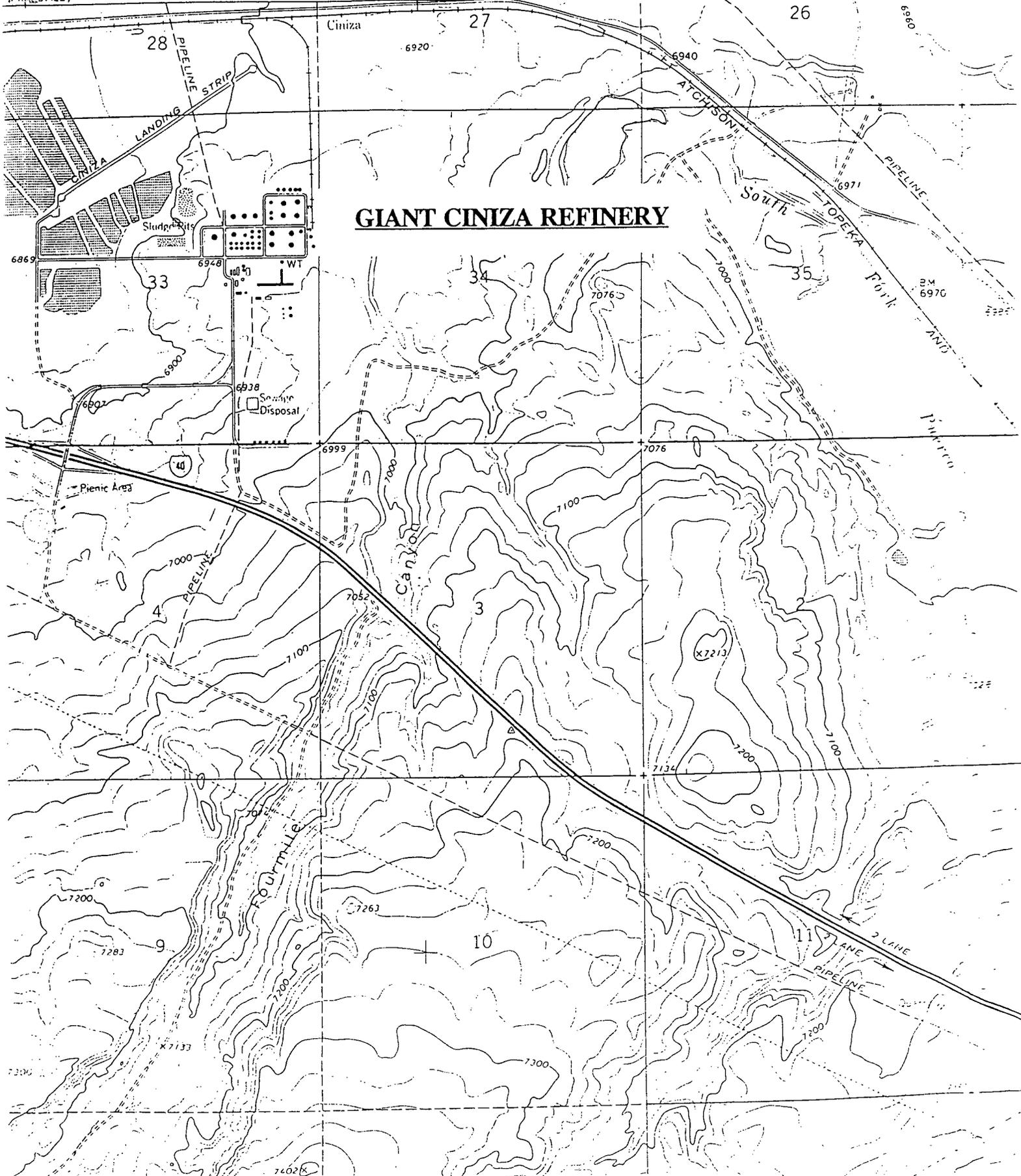
Giant requests a Class I RCRA Part A permit modification based on the provisions of 40 CFR 270.42.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

ATTACHMENT A

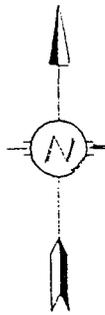
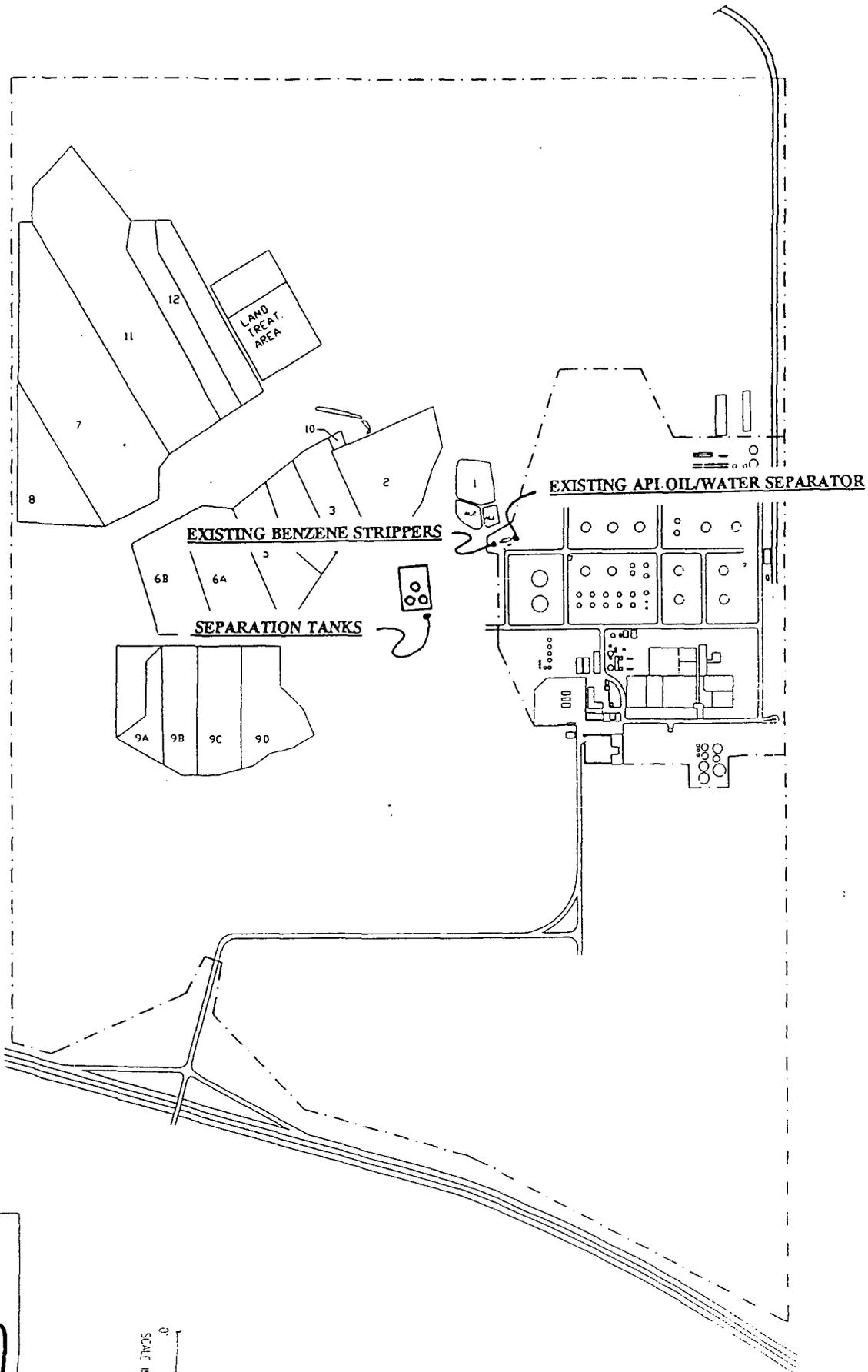
USGS Quadrangle

4 SW (PARTIAL) 733 734 25' R. 15 W. 735 330 000 FEET 736 737



ATTACHMENT B

Facility Plan



0' 500'
SCALE IN FEET

SITE DWG NO
A

GIANT

PIPING PLAN

ATTACHMENT C

Aerial Photograph





June 24, 1996

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

Mr. Patricio W. Sanchez
Petroleum Engineer
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RECEIVED

JUN 24 1996

Environmental Bureau
Oil Conservation Division

Dear Mr. Sanchez:

***SUBJECT: RESPONSE TO NMOCD'S GW-32 PERMIT RENEWAL INSPECTION
DATED DECEMBER, 1995.***

As per our telephone conversation of June 19, 1996, concerning the captioned subject, attached you will find one original and one copy of Giant Refining Company's "Response to NMOCD'S GW-32 Permit Renewal Inspection Dated December, 1995". In addition, Giant has forwarded one copy of the attached document to Mr. Denny Foust in Aztec.

If, after reviewing the attached, you have any questions or concerns, please immediately contact me at (505)722-0227.

Sincerely,

Edward L. Horst, Environmental Manager
Giant Refining Company
Ciniza Refinery

cc: Dick Platt, General Manager, Giant Refining Company
David Pavlich, HSE Manager, Giant Refining Company
Steve Morris, Environmental Specialist, Giant Refining Company
Kim Bullerdick, Legal, Giant Industries of Arizona

**RESPONSE TO NMOCD'S GW-32
PERMIT RENEWAL INSPECTION
DATED DECEMBER, 1995**

**GIANT REFINING COMPANY CINZA
REFINERY**

JUNE 24, 1996

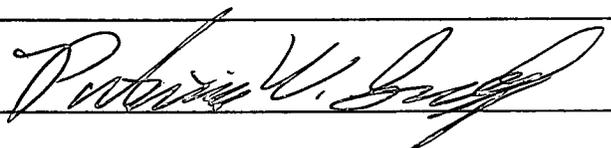
by: Edward L. Horst
Environmental Manager

RECEIVED

JUN 24 1996

Environmental Bureau
Oil Conservation Division

MEMORANDUM OF MEETING OR CONVERSATION

<input type="checkbox"/> Telephone	<input checked="" type="checkbox"/> Personal	Time 3:00 P.M.	Date 6-20-96 Thursday
<u>Originating Party</u>		<u>Other Parties</u>	
Pat Sanchez - OCD		Bob Sweeney - NMED, HRMB	
<u>Subject</u> CAP - Giant Ciniza: OCD response letter dated June 20, 1996.			
<u>Discussion</u> Discussed CAP dated April 15, 1996 from Mr. Edward Hurst w/ Giant Ciniza and OCD'S Letter that incorporated review letters dated May 29, 1996 from Mr. Ron Kern w/ NMED and the letter from EPA Region 6 dated May 29, 1996 from David Neleigh. Bob also let me know that Ron Kern is no longer the program manager and to send all correspondence to Mr. Benito Garcia.			
<u>Conclusions or Agreements</u> Mr. Sweeney had no further items of concern and felt OCD letter incorporated all items of concern.			
<u>Distribution</u> File, Bob Sweeney, Benito Garcia, Ed Hurst.		Signed 	



STATE OF NEW MEXICO
 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
 2040 S. PACHECO
 SANTA FE, NEW MEXICO 87505
 (505) 827-7131

June 20, 1996

P 594 835-146

US Postal Service
 Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail (See reverse)

CERTIFIED MAIL
RETURN RECEIPT NO. P-594-835-146

Mr. Edward L. Horst
 Environmental Manager
 Giant Refining - Ciniza
 Route 3, Box 7
 Gallup, NM 87301

**RE: Corrective Action Plan Dated April 15, 1996(CAP)
 Discharge Plan GW- 32
 Giant Ciniza Refinery**

Dear Mr. Horst:

The New Mexico Oil Conservation Division (OCD) has received Giant's letter and "Corrective action Plan" (CAP) dated April 15, 1996. The OCD has completed its review of the above mentioned plan and has included for Giant's reference comments received by the OCD from the NMED HRMB and EPA Region Six. The review that follows will contain OCD's requirements before the final approval of this proposed "Corrective Action Plan" may be granted:

- Per Verbal phone conversation with Mr. Horst with Giant the OCD requests that the recovery water from the two proposed recovery wells be sampled for WQCC Section 3103 A, B, and C constituents of concern using EPA approved sampling collection and analysis methods before the effluent is disposed of into the API Separator and plant waste water system. Each well shall be purged three wellbore volumes before the sample is collected. Further, the OCD requests that Giant determine the thickness of the free product in the proposed recovery wells B-2 and BG-4. Also, Giant needs to estimate the additional quantity of waste water that will be discharged to the API Separator.

Note: On May 8, 1996 the OCD granted Giant approval to begin recovery of the free product - the OCD requests that Giant not begin recovery and discharge to the API Separator and plant waste water system until the results from the sampling of the effluent generated from wells B-2 and BG-4 are obtained and reviewed by the OCD.

- Pursuant to WQCC Section 4105 A. 6 Giant is exempt from filing an Abatement plan provided: "under the authority of a ground-water discharge plan approved by the secretary, provided that such abatement is consistent with the requirements and provisions of Sections 4101, 4103, 4106.C, 4106.E, 4107 and 4112 of this part."

Sent to Giant-Ciniza - ED Horst	
Street & Number Route 3, Box 7 Gallup, NM	
Post Office, State, & ZIP Code Gallup NM 87301	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

Mr. Edward Horst
Giant Refining
CAP
June 20, 1996
Page 2

Giant shall therefore review the WQCC regulations (a copy of which is provided for Giants reference) and requirements stated on the previous page and submit additional information to the "Corrective Action Plan" dated April 15, 1996 to OCD addressing all the items required by the WQCC regulations.

The OCD concurs with the items of concern as listed by the NMED and EPA excluding the following issues:

See NMED memo dated May 29, 1996 from Bob Sweeney to Ron Kern:

1. Under General Comment 1:

- It is OCD's understanding that the source of the contamination was due to old operational practices of tank cleaning and not leaking AST's or below grade lines leaking (see previous Tank 569 correspondence from OCD dated March 23, 1995 and Giant reply dated April 4, 1996.), is this still the position of Giant or has new information regarding the integrity of the AST's been obtained to prove otherwise?

2. Specific Comments: Page 11, Paragraph 2:

- The OCD in this letter has stated that the recovery well(s) effluent will be sampled for WQCC 3103 A, B, and C constituents of concern before discharge to the API Separator. Therefore the issue of sampling API Separator effluent then becomes a non-issue.

Giant shall submit all the requested information within 60 days of receipt of this review letter and shall copy Mr. Benito Garcia - NMED HRMB, with all correspondence regarding this "Corrective Action Plan."

If Giant has any questions please feel free to call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez
Petroleum Engineer

xc: Mr. Denny Foust - NMOCD, Mr. Benito Garcia and Mr. Bob Sweeney - NMED, HRMB

Attachments



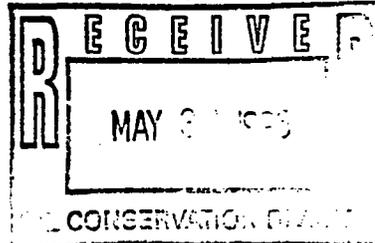
GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY



May 29, 1996

Mr. Patricio W. Sanchez
Petroleum Engineer
Oil Conservation Division
New Mexico Energy, Minerals and
Natural Resources Department
2040 South Pacheco Street
Santa Fe, New Mexico 87505

RE: **Comments on the Corrective Action Plan for SWMU #6, Product Recovery, Giant Refining Company (Ciniza).**

Dear Mr. Sanchez:

The attached memorandum includes the Hazardous and Radioactive Materials Bureau's (HRMB) comments regarding Giant Refining Company's April 15, 1996 *Corrective Action Plan (CAP)* for recovering free product located below Solid Waste Management Unit 6, the Tank Farm. The HRMB comments include the comments and concerns of EPA and, as agreed on during our meetings of May 8 and 17, are to be included in your response to Giant regarding the CAP. Please send a copy of all correspondence related to this CAP to my attention at HRMB.

If you have questions on the attached comments you may contact Mr. Bob Sweeney of my staff at 827-1558.

Sincerely,

Ronald A. Kern
RCRA Technical Compliance Program Manager

cc: Barbara Hoditschek, RCRA Permitting Program Manager
James Harris, EPA Region 6
GRC 1996 Red File
RCRA TCP GRC File

RECEIVED

JUN 10 1996

Environmental Bureau
Oil Conservation Division

NEW MEXICO ENVIRONMENT DEPARTMENT
Hazardous and Radioactive Materials Bureau

MEMORANDUM

Date: May 29, 1996
To: Ron Kern, Technical Compliance Program Manager
From: Bob Sweeney
Re: Giant Refining Company - Ciniza (GRC-C) "CORRECTIVE ACTION PLAN SWMU-6 PRODUCT RECOVERY" dated 15APR96.

The following deficiency comments are submitted for your approval. The comments express the concerns James Harris (EPA R6) and I have regarding Giant Refinery's April 15, 1996 *Corrective Action Plan* (CAP) for recovering free product located below Solid Waste Management Unit 6 (SWMU-6), the Tank Farm. When the comments are approved they will be forwarded to the Oil Conservation Division (OCD) for inclusion in a letter OCD is preparing in response to the CAP.

General Comment 1: SWMU-6 is included in the Hazardous and Solid Waste Amendments module of Giant Refining Company's Resource Conservation and Recovery Act Permit and, as such, requires certain corrective actions to be taken when hazardous constituents have been released to the environment. The following issues need to be addressed:

- The source of the contamination must be determined and further release prevented. Are the storage tanks in SWMU-6 now active? Have they been checked for releases? Has all piping in the area been tested for leaks? What other potential contamination sources exist at the site?
- Contaminant characterization must be completed. What contaminant types and concentrations are in the groundwater and soils at SWMU-6? At what rate is the contamination spreading away from the SWMU-6? What is the extent (both vertical and horizontal) of contamination?

- What are the hazardous constituents of concern for the site? How and where will environmental media be sampled for hazardous waste contamination? What analyses will be done for hazardous constituents in both soils and groundwater?

General Comment 2: The proposed pump & treat method of product removal is likely to alter the characteristics of the contaminant plume. How does GRC-C propose to monitor the changes?

General Comment 3: A timetable for completion of the several tasks associated with corrective action for SWMU-6 must be submitted.

General Comment 4: NMED needs construction & lithology logs and ground levels for the OW wells in order to determine if they're usable, as proposed, in the proposed corrective action.

Specific Comments:

Page 10, Paragraph 2: The boreholes will be sampled and analyzed for hazardous constituents every two feet until two "clean" samples are found.

Page 11, Paragraph 2: How will the API Separator effluent water be checked for dissolved constituents? How will any contaminated water be handled?

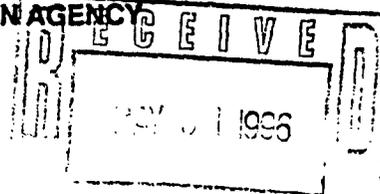
Page 11, Paragraph 3: Does GRC-C assume all free product will be removed by pumping from wells B-2 and BG-4? How will contaminated soil and groundwater be remediated?

Page 12, Paragraph 1: Are the wells OW-14 and OW-13 downgradient of SWMU-6? Across which sands are the two wells screened?



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733



MAY 2 9 1996

Barbara Hoditschek, Manager, RCRA Permits Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo
P.O. Box 26110
Santa Fe, NM 87502

RE: Comments on the Corrective Action Plan for SWMU # 6, Product Recovery, Giant Refinery (Ciniza), EPA ID. No. NMD000333211.

Dear Ms. Hoditschek:

On April 19, 1996 the Environmental Protection Agency (EPA) received a copy of the Corrective Action Plan (CAP) for SWMU # 6, Product Recovery, Giant Refinery (Ciniza). EPA has reviewed the CAP and recommends further horizontal and vertical delineation of the plume. In a letter dated January 7, 1994 EPA requested "...Sampling must extend vertically until no subsequent increase in contamination levels is likely to occur. A minimum of two (2) clean samples are required to verify delineation." EPA also indicated in a letter dated December 15, 1994 "...EPA's interpretation of the soil boring results indicate that there is BTEX contamination in the most vertical interval taken at each tank boring. Therefore, the full extent of contamination has not been determined at each tank."

Stabilization measures should be implemented to isolate and remove the free product in the subsurface. EPA recommends the extent of the release should be determined so as to track the changes in the movement of the plume once the hydrostatic pressure is altered by the pump and treat system.

If you have any questions regarding EPA's comments on the CAP at SWMU # 6 please contact James Harris of my staff at (214) 665-8302.

Sincerely,

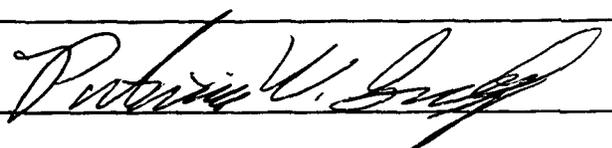
David Neleigh, Chief
New Mexico and Federal
Facilities Section

cc: Benito Garcia
Bob Sweeney
Patricio W. Sanchez



Printed on Recycled Paper

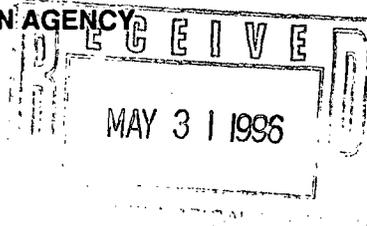
MEMORANDUM OF MEETING OR CONVERSATION

<input type="checkbox"/> Telephone	<input checked="" type="checkbox"/> Personal	Time 3:00 P.M.	Date 6-20-96 Thursday
<u>Originating Party</u>		<u>Other Parties</u>	
Pat Sanchez - OCD		Bob Sweeney - NMED, HRMB	
<u>Subject</u> CAP - Giant Ciniza: OCD response letter dated June 20, 1996.			
<u>Discussion</u> Discussed CAP dated April 15, 1996 from Mr. Edward Horst w/ Giant Ciniza and OCD'S Letter that incorporated review letters dated May 29, 1996 from Mr. Ron Kern w/ NMED and the letter from EPA Region 6 dated May 29, 1996 from David Meleigh. Bob also let me know that Ron Kern is no longer the program manager and to send all correspondence to Mr. Benito Garcia.			
<u>Conclusions or Agreements</u> Mr. Sweeney had no further items of concern and felt OCD letter incorporated all items of concern.			
<u>Distribution</u> File, Bob Sweeney, Benito Garcia, Ed Horst.		Signed 	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733



MAY 29 1996

Barbara Hoditschek, Manager, RCRA Permits Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo
P.O. Box 26110
Santa Fe, NM 87502

RE: Comments on the Corrective Action Plan for SWMU # 6, Product Recovery, Giant Refinery (Ciniza), EPA ID. No. NMD000333211.

Dear Ms. Hoditschek:

On April 19, 1996 the Environmental Protection Agency (EPA) received a copy of the Corrective Action Plan (CAP) for SWMU # 6, Product Recovery, Giant Refinery (Ciniza). EPA has reviewed the CAP and recommends further horizontal and vertical delineation of the plume. In a letter dated January 7, 1994 EPA requested "...Sampling must extend vertically until no subsequent increase in contamination levels is likely to occur. A minimum of two (2) clean samples are required to verify delineation." EPA also indicated in a letter dated December 15, 1994 "...EPA's interpretation of the soil boring results indicate that there is BTEX contamination in the most vertical interval taken at each tank boring. Therefore, the full extent of contamination has not been determined at each tank."

Stabilization measures should be implemented to isolate and remove the free product in the subsurface. EPA recommends the extent of the release should be determined so as to track the changes in the movement of the plume once the hydrostatic pressure is altered by the pump and treat system.

If you have any questions regarding EPA's comments on the CAP at SWMU # 6 please contact James Harris of my staff at (214) 665-8302.

Sincerely,

David Neleigh, Chief
New Mexico and Federal
Facilities Section

cc: Benito Garcia
Bob Sweeney
Patricio W. Sanchez



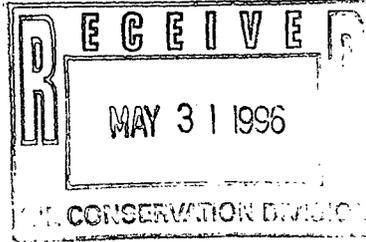
State of New Mexico
ENVIRONMENT DEPARTMENT
 Hazardous & Radioactive Materials Bureau
 2044 Galisteo
 P.O. Box 26110
 Santa Fe, New Mexico 87502
 (505) 827-1557
 Fax (505) 827-1544



GARY E. JOHNSON
 GOVERNOR

MARK E. WEIDLER
 SECRETARY

EDGAR T. THORNTON, III
 DEPUTY SECRETARY



May 29, 1996

Mr. Patricio W. Sanchez
 Petroleum Engineer
 Oil Conservation Division
 New Mexico Energy, Minerals and
 Natural Resources Department
 2040 South Pacheco Street
 Santa Fe, New Mexico 87505

RE: Comments on the Corrective Action Plan for SWMU #6, Product Recovery, Giant Refining Company (Ciniza).

Dear Mr. Sanchez:

The attached memorandum includes the Hazardous and Radioactive Materials Bureau's (HRMB) comments regarding Giant Refining Company's April 15, 1996 Corrective Action Plan (CAP) for recovering free product located below Solid Waste Management Unit 6, the Tank Farm. The HRMB comments include the comments and concerns of EPA and, as agreed on during our meetings of May 8 and 17, are to be included in your response to Giant regarding the CAP. Please send a copy of all correspondence related to this CAP to my attention at HRMB.

If you have questions on the attached comments you may contact Mr. Bob Sweeney of my staff at 827-1558.

Sincerely,

Ronald A. Kern
 RCRA Technical Compliance Program Manager

cc: Barbara Hoditschek, RCRA Permitting Program Manager
 James Harris, EPA Region 6
 GRC 1996 Red File
 RCRA TCP GRC File

RECEIVED

JUN 10 1996

Environmental Bureau
 Oil Conservation Division

~~RECEIVED~~
~~APR 01 1996~~
~~Environmental Bureau~~
~~Oil Conservation Division~~

NEW MEXICO ENVIRONMENT DEPARTMENT
Hazardous and Radioactive Materials Bureau

MEMORANDUM

Date: May 29, 1996

To: Ron Kern, Technical Compliance Program Manager

From: Bob Sweeney

Re: Giant Refining Company - Ciniza (GRC-C) "CORRECTIVE ACTION PLAN SWMU-6 PRODUCT RECOVERY" dated 15APR96.

The following deficiency comments are submitted for your approval. The comments express the concerns James Harris (EPA R6) and I have regarding Giant Refinery's April 15, 1996 *Corrective Action Plan* (CAP) for recovering free product located below Solid Waste Management Unit 6 (SWMU-6), the Tank Farm. When the comments are approved they will be forwarded to the Oil Conservation Division (OCD) for inclusion in a letter OCD is preparing in response to the CAP.

General Comment 1: SWMU-6 is included in the Hazardous and Solid Waste Amendments module of Giant Refining Company's Resource Conservation and Recovery Act Permit and, as such, requires certain corrective actions to be taken when hazardous constituents have been released to the environment. The following issues need to be addressed:

- The source of the contamination must be determined and further release prevented. Are the storage tanks in SWMU-6 now active? Have they been checked for releases? Has all piping in the area been tested for leaks? What other potential contamination sources exist at the site?
- Contaminant characterization must be completed. What contaminant types and concentrations are in the groundwater and soils at SWMU-6? At what rate is the contamination spreading away from the SWMU-6? What is the extent (both vertical and horizontal) of contamination?

- What are the hazardous constituents of concern for the site? How and where will environmental media be sampled for hazardous waste contamination? What analyses will be done for hazardous constituents in both soils and groundwater?

General Comment 2: The proposed pump & treat method of product removal is likely to alter the characteristics of the contaminant plume. How does GRC-C propose to monitor the changes?

General Comment 3: A timetable for completion of the several tasks associated with corrective action for SWMU-6 must be submitted.

General Comment 4: NMED needs construction & lithology logs and ground levels for the OW wells in order to determine if they're usable, as proposed, in the proposed corrective action.

Specific Comments:

Page 10, Paragraph 2: The boreholes will be sampled and analyzed for hazardous constituents every two feet until two "clean" samples are found.

Page 11, Paragraph 2: How will the API Separator effluent water be checked for dissolved constituents? How will any contaminated water be handled?

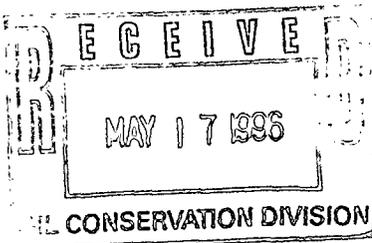
Page 11, Paragraph 3: Does GRC-C assume all free product will be removed by pumping from wells B-2 and BG-4? How will contaminated soil and groundwater be remediated?

Page 12, Paragraph 1: Are the wells OW-14 and OW-13 downgradient of SWMU-6? Across which sands are the two wells screened?

May 14, 1996

Mr. Patricio W. Sanchez
Petroleum Engineer

New Mexico Energy, Minerals and Natrual Resources Department
Oil Conservation division
2040 South Pacheco
Santa Fe, New Mexico 87505



GIANT
REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

Dear Mr. Garcia:

SUBJECT: REQUEST TO PLUG AND ABANDON OW-5.

Giant Refining Company is requesting permission to plug and abandon Observation Well (OW)-5. In reviewing all available information and physically inspecting this well, it has been found to have a perforated casing from above ground level to approximately 25 feet deep. Giant has determined plugging and abandoning OW-5 will not impact any required groundwater monitoring activities at its Ciniza Facility.

Attached is a copy of a map showing the location of OW-5 and other wells that are presently being monitored by Giant. By plugging and abandoning OW-5, groundwater monitoring will not be jeopardized since there is still Monitoring Well (MW)-4 in the same area.

Giant feel that this well, if left "operational", offers an avenue for surface water to migrate downward in to the lower zones, thus impacting any results and reports that would use analytical information associated with OW-5.

The New Mexico Environment Department, Hazardous and Radioactive Materials Bureau is also being contacted for this same purpose. If there are any questions about this matter please contact me at (505)722-0227.

A handwritten signature in black ink, appearing to read "Edward L. Horst".

Edward L. Horst
Environmental Manager
Giant Refining Company
CINIZA Refinery

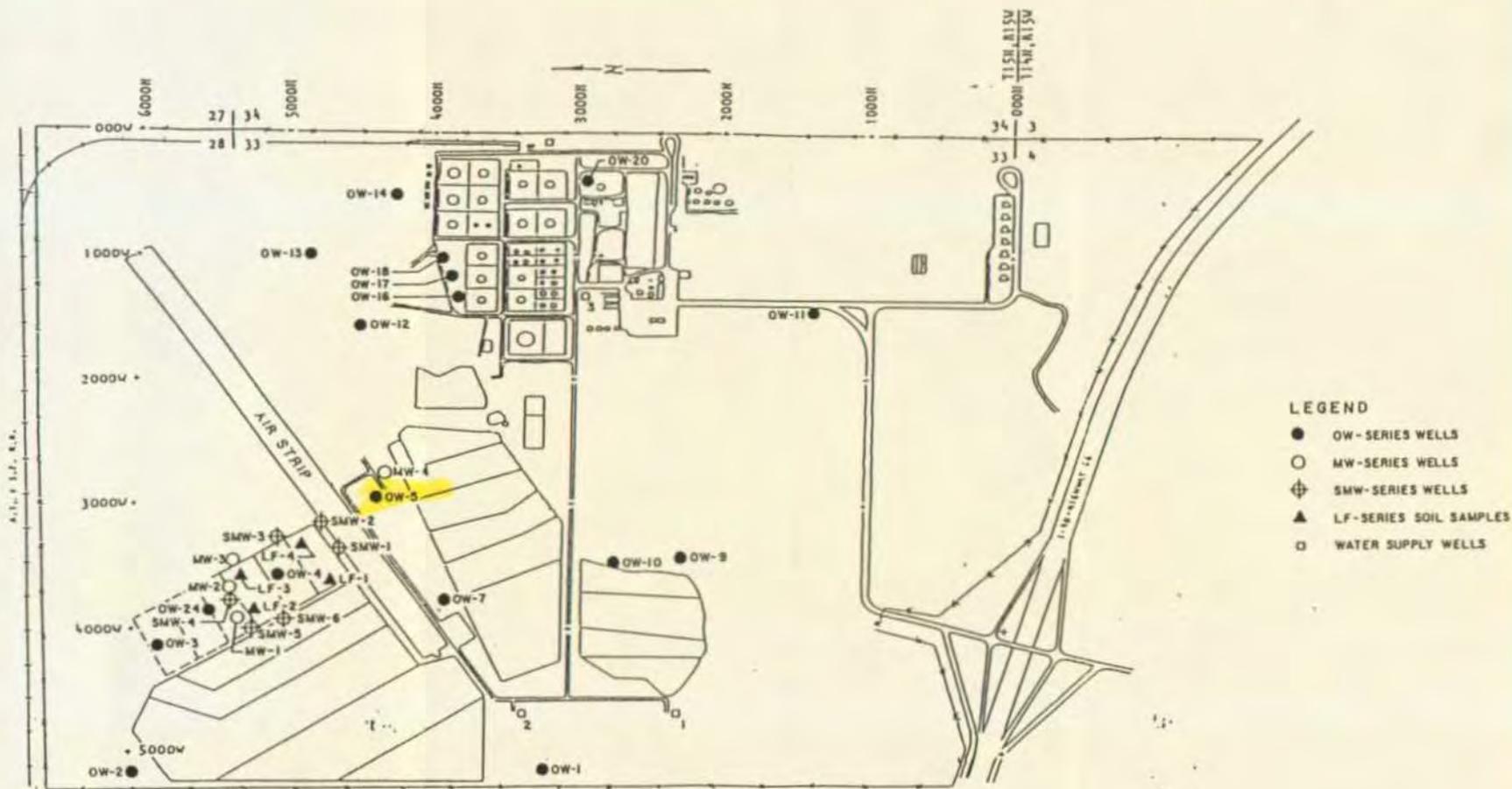
RECEIVED

MAY 17 1996

Environmental Bureau
Oil Conservation Division

cc: Benito Garcia, Bureau Chief, NMED
Barbara Hoditscheck, Program Manager-Permitting, NMED
Ron Kern, Program Manager-Technical, NMED
Coby Muckelroy, Program Manager-Enforcement, NMED
David Pavlich, Health, Safety and Environmental Manager, Giant Refining Co.
Kim Bullerdick, Corporate Counsel, Giant Industries Arizona, Inc.

Verbally approved on 6-5-96
w/ Ed Horst-Giant. PWS
Ed Horst to send follow-up on PIA!



33 | 34
SECTION CORNER
4 | 3

APPROXIMATE SCALE
0 500 1000
FEET

MAP ADAPTED FROM REFINERY SITE MAP, DELTA 8 ENGINEERING, LTD.,
11-18-88. BASE MAP REFERENCE: MASTER PLAN, CERIA REFINERY,
GALLUP, NEW MEXICO, SOUTHWESTERN ENGINEERING COMPANY, 11-81-123-87.
REVISION 1-4-71. EVAPORATION POND BOUNDARIES ARE ESTIMATED.

LEGEND

- OW-SERIES WELLS
- MW-SERIES WELLS
- ⊠ SMW-SERIES WELLS
- ▲ LF-SERIES SOIL SAMPLES
- WATER SUPPLY WELLS

FIGURE 4-2
APPROXIMATE WELL AND
SOIL SAMPLE LOCATIONS
GIANT CIHIZA REFINERY
RCRA FACILITY ASSESSMENT



May 13, 1996

Route 3, Box 7
Gallup, New Mexico
87301

Mr. Benito J. Garcia
Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo
P. O. Box 26110
Santa Fe, New Mexico 87502

505
722-3833

RECEIVED

MAY 17 1996

Dear Mr. Garcia:

Environmental Bureau
Oil Conservation Division

SUBJECT: REQUEST TO PLUG AND ABANDON OW-5.

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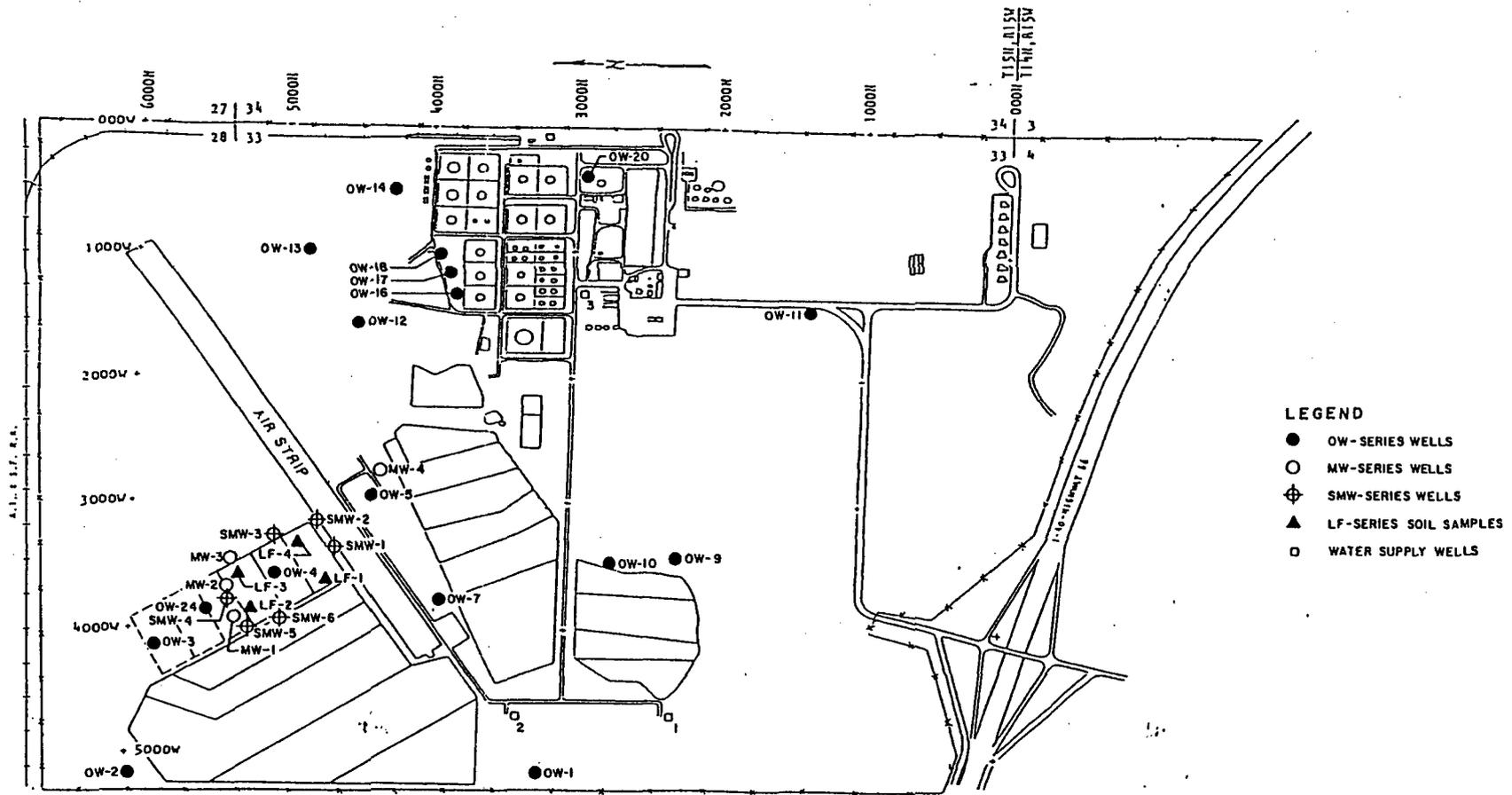
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The New Mexico Oil Conservation Division is also being contacted for this same purpose. If there are any questions about this matter please contact me at (505)722-0227.

Edward L. Horst
Environmental Manager
Giant Refining Company
CINIZA Refinery

cc: Pat Sanchez, Petroleum Engineer, NMOCD
David Pavlich, Health, Safety and Environmental Manager, Giant Refining Co.
Kim Bullerdick, Corporate Counsel, Giant Industries Arizona, Inc.
Barbara Hoditscheck, Program Manager-Permitting, NMED
Ron Kern, Program Manager-Technical, NMED
Coby Muckelroy, Program Manager-Enforcement, NMED



LEGEND

- OW-SERIES WELLS
- MW-SERIES WELLS
- ⊕ SMW-SERIES WELLS
- ▲ LF-SERIES SOIL SAMPLES
- WATER SUPPLY WELLS



MAP ADAPTED FROM REFINERY SITE MAP, DECCA E ENGINEERING, LTD.,
11-16-84. BASE MAP REFERENCE: MASTER PLAN, CINIZA REFINERY,
GALLUP, NEW MEXICO, SOUTHWESTERN ENGINEERING COMPANY, 21-02-123-EP.
REVISION 8-4-71. EVAPORATION POND BOUNDARIES ARE ESTIMATED.

33 | 34
SECTION CORNER

FIGURE 4-2
APPROXIMATE WELL AND
SOIL SAMPLE LOCATIONS
GIANT CINIZA REFINERY
RCRA FACILITY ASSESSMENT



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

May 8, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-145

Mr. Edward L. Horst
Environmental Manager
Giant Refining - Ciniza
Route 3, Box 7
Gallup, NM 87301

RE: Corrective Action Plan Dated April 15, 1996(CAP)
Discharge Plan GW- 32
Giant Ciniza Refinery

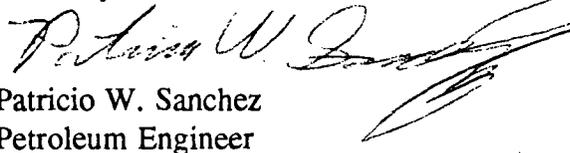
Dear Mr. Horst:

The New Mexico Oil Conservation Division (OCD) has received Giant's letter and "Corrective action Plan" (CAP) dated April 15, 1996. The OCD will be reviewing the plan in detail over the next few weeks and will have a review submitted to Giant no latter than June 18, 1996 regarding the plans adequacy to address the contamination and remmediation in the area outlined in the CAP. **In the mean time Giant shall begin free phase product recovery no later than July 1, 1996 from the two proposed recovery wells B-2 and BG-4, with all the effluent from these wells going to the API Separator.**

Note, that OCD direction does not relieve Giant of liability should operations at Ciniza result in contamination of surface waters, ground waters or the environment which is a result of this directive to recover free phase product. In addition, OCD direction 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 feel free to me at (505)-827-7156.

Sincerely,


Patricio W. Sanchez
Petroleum Engineer

xc: Mr. Denny Foust - NMOCD
Mr. Ron Kern - NMED, HRMB
Mr. Bob Sweeney - NMED, HRMB

PS Form 3800, March 1993

Postmark or Date	
TOTAL Postage & Fees	
Return Receipt Showing to Whom, Date, and Addressee's Address	
Restricted Delivery Fee	
Special Delivery Fee	
Certified Fee	
Postage	
P.O. State and ZIP Code	Gallup, NM 87301
Street and No.	Route 3 Box 7
Sent to	Giant - Ed Horst


Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse) CAP

Z 765 963 145

CONSERVATION DIVISION
RECEIVED



April 29, 1996

'96 APR 30 AM 8 52

Route 3, Box 7
Gallup, New Mexico
87301

Mr. Benito J. Garcia, Bureau Chief
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Mr. Garcia:

SUBJECT: CORRECTIVE ACTION PLAN SWMU-6 PRODUCT RECOVERY

Giant Refining Company (Giant) is in receipt of your April 24, 1996, letter informing Giant that New Mexico has obtained RCRA Corrective Action Authorization through its Hazardous and Radioactive Materials Bureau. Recently, on April 15, 1996, Giant transmitted the Environmental Protection Agency (EPA) Region 6 and the New Mexico Oil Conservation Division (OCD) a Corrective Action Plan (CAP) for recovering free product located below Solid Waste Management Unit 6 (SWMU-6). Giant requested that the USEPA and NMOCD review the CAP and if they had any questions to contact me or Mr. David Pavlich.

Enclosed, for your review, is a copy of the CAP submitted to the USEPA and NMOCD. I want to note that this document is intended to be a "living" document and may be modified as additional information is obtained.

If there are any questions in this matter, please contact me at (505) 722-0227 or Mr. David Pavlich at (505) 722-0217.

Sincerely,

Edward L. Horst, Environmental Manager
Giant Refining Company
Ciniza Refinery

cc: Mr. Ronald Kern, Manager, RCRA Technical Compliance Program, NMED/HRMB
Ms. Barbara Hoditscheck, Manager, RCRA Permits Program, NMED/HRMB
Mr. Patricio W. Sanchez, Petroleum Engineer, NMOCD w/o enclosure
Mr. David Neleigh, Chief, New Mexico Federal Facilities Section, EPA Region 6
Mr. Dick Platt, General Manager Giant Refining Company w/o enclosures
Mr. David Pavlich, HSE Manager Giant Refining Company w/o enclosures
Mr. Kim Bullerdick, Legal Counsel, Giant Industries Arizona



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

April 24, 1996

Dick Platt, General Manager
Giant Refining Company - Ciniza
Route 3, Box 7
Gallup, New Mexico 87301

Dear Mr. Platt:

RE: New Mexico RCRA Corrective Action Authorization and the Flow of Corrective Action Documents

On January 26, 1996, a Federal Register notice announced that New Mexico had received authorization from the U.S. Environmental Protection Agency (EPA) for the Corrective Action (CA) component of the Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The New Mexico Environment Department (NMED) is now the Administrative Authority for HSWA CA, and the Hazardous and Radioactive Materials Bureau (HRMB) is the implementing organization for HSWA CA within NMED. HRMB now has authority and is the responsible agency for both the HSWA Permit Module, as well as the base RCRA Permit(s) for your facility.

NMED and EPA have entered into a "Workshare Agreement" currently whereby EPA will assist NMED with specific HSWA activities at the facility. EPA will forward any comments or other HSWA CA-related information to NMED. NMED will incorporate EPA comments on CA documents for transmittal to the facility. Additionally, NMED will provide for all required public notices and meetings for permit modifications, issue final decisions, and make regulatory notifications.

To ensure an appropriate flow of HSWA CA correspondence and documents between NMED and the facility, the following procedural guidelines shall be adhered to by NMED and the facility. NMED will transmit all comments on CA documents (e.g. Notices of Deficiency, approval letters, and permit modification information) to you, as the facility contact, or to your designated representative. The facility shall send an original response and any document related to HSWA CA to me and a copy for the following persons, unless stipulated otherwise by NMED:

Ronald Kern, Manager, RCRA Technical Compliance Program, NMED/HRMB
Barbara Hoditschek, Manager, RCRA Permits Program, NMED/HRMB
David Neleigh, Chief, New Mexico Federal Facilities Section, EPA Region 6

HSWA CA Authorization
April 24, 1996
Page 2

Should you have any questions regarding this letter, please contact me at (505) 827-1557 or Ronald Kern of my staff at (505) 827-1560.

Sincerely,



Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

cc: Ed Kelley, Director, NMED/WWMD
Susan McMichael, NMED/OGC
Ronald Kern, Manager, RCRA Technical Compliance Program, NMED
Barbara Hoditschek, Manager, RCRA Permits Program, NMED
David Neleigh, Chief, NM Federal Facilities Section, EPA 6
Edward Horst, Environmental Manager, GRC-Ciniza



April 15, 1996

Route 3, Box 7
Gallup, New Mexico
87301

Mr. Patricio W. Sanchez
Petroleum Engineer
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Sanchez:

SUBJECT: CORRECTIVE ACTION PLAN SWMU-6 PRODUCT RECOVERY.

Enclosed is Giant Refining Company's Corrective Action Plan for product recovery at the area known as the Tank Farm and identified as part of the Solid Waste Management Unit (SWMU) - 6. A copy of this document is being transmitted to Mr. James Harris, Region 6, U. S. Environmental Protection Agency (USEPA) for his review. Please review this document and if there are any questions please contact me at (505) 722-0227 or Mr. David Pavlich at (505) 722-0217.

Thank you for all the help you have given to me on this issue.

Sincerely

Edward L. Horst, Environmental Manager
Giant Refining Company
Ciniza Refinery

RECEIVED

APR 18 1996

Environmental Bureau
Oil Conservation Division

cc: Mr. James Harris, RCRA Facility Manager/Geologist
U. S. Environmental Protection Agency Region 6

w/o enclosure

Kim Bullerdick, Legal Counsel, Giant Industries Arizona
Dick Platt, General Manager Giant Refining Company
David Pavlich, HSE Manager
Steve Morris, Environmental Spec.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

January 24, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-007

Mr. David Pavlich
HSE Manager
Giant Refining - Ciniza
Route 3, Box 7
Gallup, NM 87301

**RE: Diesel Tank addition
Discharge Plan GW- 32
Giant Ciniza Refinery**

Dear Mr. Pavlich:

PWG
*should be BDL / per
RCA & Ed. (2-9-96)*

The New Mexico Oil Conservation Division (OCD) has received Giant's letter dated January 19, 1996, requesting OCD approval for the addition of a 55,000-gallon diesel storage tank. The request is hereby approved as a minor modification to the approved discharge plan GW-32.

The Application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3107.C and is approved pursuant to WQCC Regulation 3109. Please note that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3107.C you are required to notify the Director of any facility expansion, production increase or process modification that would result in a significant modification in the discharge of potential ground water contaminants.

Note, that OCD approval does not relieve Giant of liability should operations at Ciniza result in contamination of surface waters, ground waters or the environment which is result of this work plan. 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 feel free to call Patricio Sanchez at (505)-827-7156.

Sincerely,

Roger C. Anderson
Roger C. Anderson
Bureau Chief

xc: Mr. Denny Foust - Geologist

PS Form 3800, March 1993

Street and No. <i>Tank Approval - GW-32</i>	Sent to <i>David Pavlich.</i>
P.O., State and ZIP Code	
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
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 No Insurance Coverage Provided
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Z 765 963 007



January 19, 1996

OIL CONSERVATION DIVISION
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Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

RECEIVED

JAN 4 1996

Via: Certified Mail

Environmental Bureau
Oil Conservation Division

Re: Giant Refining Company - Ciniza Refinery
OCD Facility Discharge Plan GW-32
Addition of Diesel Storage Tank

Dear Mr. Anderson:

In response to diesel fuel market conditions, Giant Refining has determined that it has become necessary to add additional diesel fuel storage capacity at the Company's Ciniza Refinery east of Gallup in order to meet consumer needs. An appropriate tank has been located and is available for installation at the refinery within the next few months.

The tank chosen for this service has a storage capacity of 55,000 barrels and is of an internal floating roof design. The tank is to be erected in the north-central portion of the facility's tank farm (see enclosed tank farm layout drawing) and will be tied into the oily water sewer system with a drain cup arrangement (no sub-grade water draw sump is planned). The tank will also feature a leak detection system as shown on the enclosed section and detail drawing.

Since erection of this tank will take several months to complete and the tank's availability is important to fulfilling consumer needs during the upcoming spring and summer peak-demand months, Giant would appreciate receiving approval from the OCD for commencement of construction on this project at the Bureau's earliest convenience.

Should you or your staff have any questions regarding this request or the proposed project, please do not hesitate to contact me at (505) 722-0217.

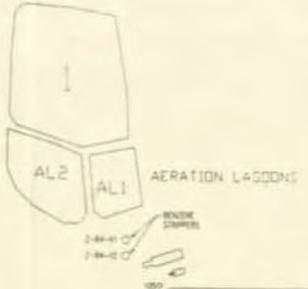
Thank you very much for your time and assistance in this matter.

Sincerely,

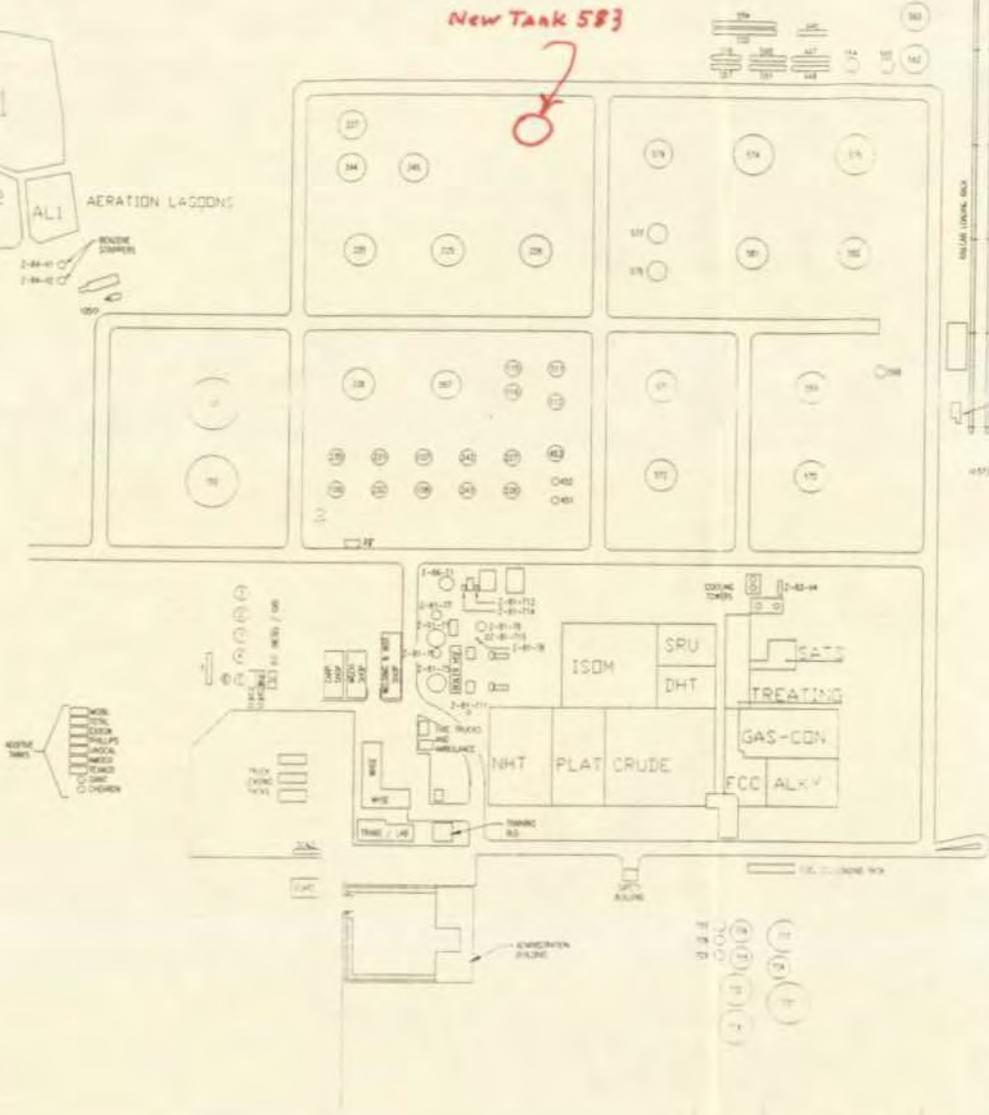
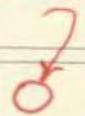
David C. Pavlich
Health, Safety & Environmental Manager

POND 1

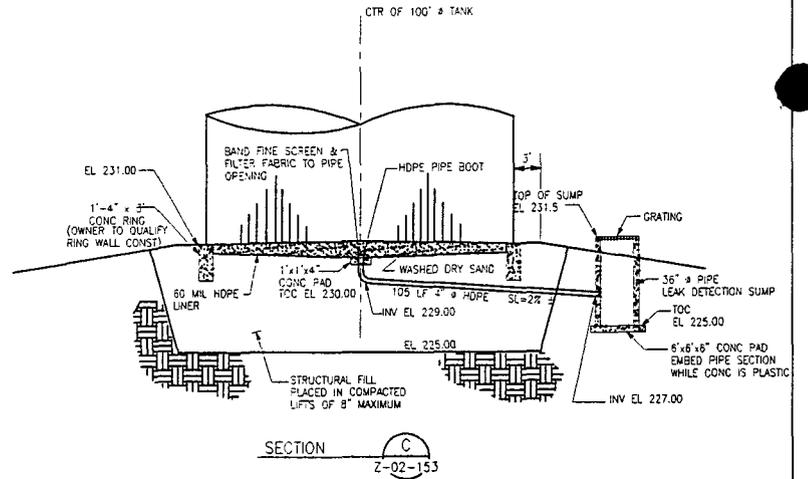
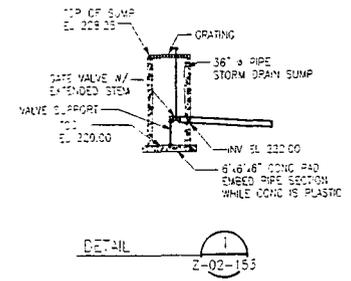
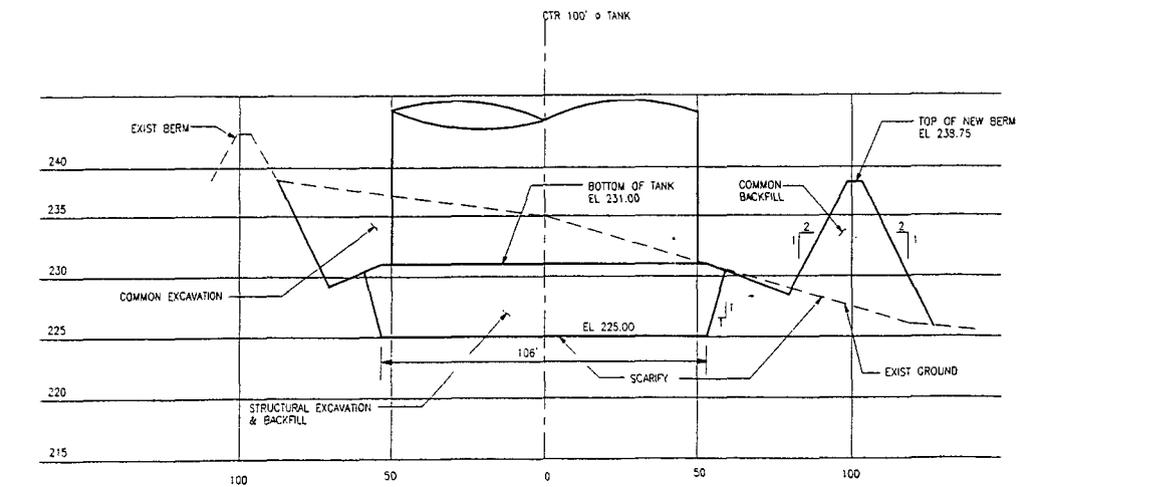
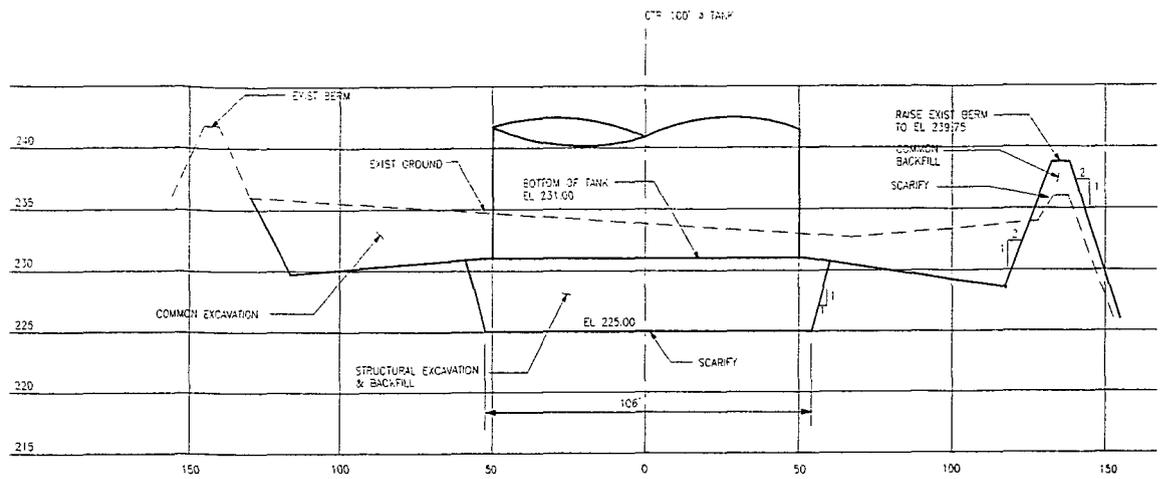
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New Tank 5B3



TITLE: **GIANT** NEW UNIT
 REF: **REFINING CO.**
 SHEET NO. **1** OF **1**
 DATE: **1-1-1962**
 DRAWN BY: **J. W. BROWN**
 CHECKED BY: **J. W. BROWN**
 APPROVED BY: **J. W. BROWN**
 PROJECT: **GIANT REFINERY**
 UNIT: **NEW UNIT**
 SHEET: **1** OF **1**
 DATE: **1-1-1962**
 DRAWN BY: **J. W. BROWN**
 CHECKED BY: **J. W. BROWN**
 APPROVED BY: **J. W. BROWN**



FOR REVIEW
THIS DRAWING HAS BEEN ISSUED FOR REVIEW
AS OF 12-19-95
RAPLEY ENGINEERING SERVICES, INC.

CINIZA REFINERY **GIAN** GALLUP NEW MEXICO
REFINING CO.
A DIVISION OF GIANT INDUSTRIES

SECTIONS & DETAILS
DIESEL FUEL
STORAGE TANK - 583

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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

January 24, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-004

Mr. Edward L. Horst
Environmental Manager
Giant Refining - Ciniza
Route 3, Box 7
Gallup, NM 87301

**RE: Offsite Waste Approval
Discharge Plan GW-32
NMOCD approved Land farm
Giant Ciniza Refinery**

Dear Mr. Horst:

The Santa Fe OCD office has received the letter dated January 11, 1996 titled " REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE ," addressed to Mr. Denny Foust with the OCD Aztec District office. Per the phone conversation with Mr. Patricio Sanchez of my Staff and yourself on The morning of January 23, 1996 - Giant Ciniza has chosen to utilize the form C-138 for wastes that are coming from offsite from Giant Industry owned facilities.

The approval process will proceed as follows for offsite materials to be disposed of at the OCD land farm at the Giant Ciniza Refinery:

1. The Aztec District office will sign the C-138 to allow the movement of the soil to the NMOCD land farm at Giant Ciniza Refinery.
2. The Santa Fe OCD office will sign the C-138 form confirming that the waste may be placed on the NMOCD land farm at Giant Ciniza Refinery.
3. All other wastes generated at the Refinery itself will be certified through the Giant Ciniza Health, Safety, and Environment department with records kept onsite so that the OCD may view them at any time as part of a Discharge plan audit type inspection.

Giant will also evaluate the efficiency of this process from time to time and can request that OCD amend the conditions in (1.) and (2.) above in order to enhance the overall efficiency.

Mr. Edward L. Horst
Giant-Ciniza Refinery
January 24, 1996
Page 2

If you have any questions with regards to this matter feel free to contact me at (505)-827-7152 or Patricio Sanchez at (505)-827-7156.

Sincerely,



Roger C. Anderson
Bureau Chief

RCA/pws

xc: Mr. Denny Foust - Geologist

Z 765 963 004



Receipt for
Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	Mr. Ed Horst
Street and No.	Giant Ciniza - GW-032
P.O., State and ZIP Code	Land Farm. OFFSITE. PWS
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 7:45 AM	Date 1-23-96
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<u>Originating Party</u>	<u>Other Parties</u>
Ed Horst w/ Giant Ciniza	Pat Sanchez - OCD

Subject Waste Application from offsite on the OCD approved Land Farm from within the Giant Industries Company.

Discussion (1) I asked Mr. Horst if he had any problem with using the C-138 form for movement of Exempt or Non-Hazardous waste to the NMOC Land Farm at the Ciniza Refinery? He said NO - because they need some way of tracking/certifying wastes from offsite.

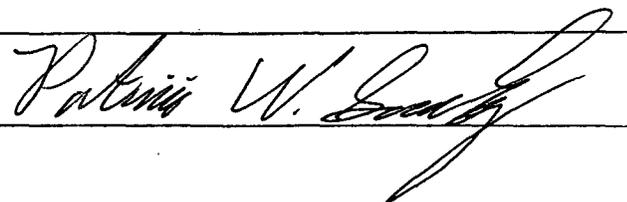
- Note: The District will approve of the movement while Santa Fe will approve of the application.

(2) Also, need to address recovery wells in the tank farm area that have "dried" out; Giant may want to look at plugging these.

Conclusions or Agreements

(1) I will draft up a letter addressing # (1)
(2) Mr. Horst to Evaluate which wells need to be plugged.

Distribution File, Ed Horst, Denny Faust

Signed 

MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal

Time 8:00 AM

Date 1-19-96

Originating Party

Other Parties

Ed Horst - Giant Ciniza

Pat Sanchez - NMOC

Subject Discharge Plan Renewal Permit Meeting.

Discussion

1. Response from Giant to be obtained within 60 days (March - 19, 1996). *
2. Double check 4th QTR. Sampling for 1994 - did Giant supply - Let Mr. Horst know.
2. Discussed Lab issues.
3. Overviewed Entire inspection report with Mr. Horst. (Dated

Conclusions or Agreements

Agreed on March 19, 1996 date for response to January 18, 1996 inspection letter from NMOC. * Items that may be "quick killed"

Distribution File, Mr. Ed. Horst.

Ed Horst

Signed

Robert W. Long

OIL CONSERVATION DIVISION

2040 South Pacheco
 Santa Fe, NM 87505
 (505)-827-7131

January 18, 1996

CERTIFIED MAIL**RETURN RECEIPT NO. Z-765-962-989**

Mr. David C. Pavlich
 HSE Manager
 Giant Refining - Ciniza
 Route 3, Box 7
 Gallup, NM 87301

**RE: Renewal Inspection
 Discharge Plan # GW-32
 Giant Ciniza Refinery**

Dear Mr. Pavlich:

The New Mexico Oil Conservation Division (OCD) has completed its analysis of the information gathered by the OCD on October 4, 5, and 6, 1995 as part of the renewal process for GW-32. Also, included with this inspection report you will find photographs (attachment No. 2) taken during the inspection by the OCD as well as sample results (attachment No. 3) from the October 24 and 25, 1995 sampling collected by the OCD. Also included with this inspection report is the August 9, 1991 commitment letter (attachment No. 1) from Giant Ciniza to the OCD outlining actions that would be undertaken by Giant as part of the 1991 renewal - upon review of this letter it should be noted that some of these commitments have not yet been implemented and need to be addressed promptly as part of this renewal process.

Note: OCD and Giant collected samples as part of the permit renewal requirements. The OCD collected samples on pond no. 9, no. 11, no. 2, OW-13, and OW-20. During the week of the sampling Giant also had to gather samples for the NMED and therefore did not collect samples on all the other OW series wells, Giant did however assure the OCD verbally that the samples would be taken by December of 1995. The samples taken by Giant on the remaining wells will be submitted to the OCD Santa Fe office for review as part of the renewal process, at which point OCD will then review all of the samples at once.

The comments that follow will refer to the enclosed photographs that were taken by the OCD during the October 4, 5, and 6, 1995 inspection of the "Ciniza Refinery."

I. October 4, 1995 - API Separator, Aeration Lagoons, Solar evaporation ponds, OCD permitted Land farm, and Western Tank Area.

OFFICE OF THE SECRETARY - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5950
 ADMINISTRATIVE SERVICES DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5925
 ENERGY CONSERVATION AND MANAGEMENT DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5900
 FORESTRY AND RESOURCES CONSERVATION DIVISION - P. O. BOX 1948 - SANTA FE, NM 87504-1948 - (505) 827-5830
 MINING AND MINERALS DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5970
 OIL CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-7131
 PARK AND RECREATION DIVISION - P. O. BOX 1147 - SANTA FE, NM 87504-1147 - (505) 827-7465

Mr. David C. Pavlich
Giant-Ciniza Refinery
January 18, 1996
Page 2

1. API Separator area - including Benzene stripper. (Photos: 1-6)

- The soil in this immediate area needs to be cleaned up, there were several patches of ground that showed visible contamination.
- The API Separator itself may be lacking in integrity-see the seam in photo No. 5. If the API Separator is going to remain in use as a sludge trap as part of the approved waste water modification (dated March 15, 1995 from OCD), it will have to be cleaned and inspected yearly by Giant to verify integrity as this is a below grade area. *Note: Giant shall document the yearly inspections and keep a record of these inspections at the facility.* Further some method of covering the API should be proposed.
- The benzene stripper was carrying over at the time of the inspection and exhausting a mist to the atmosphere - see photo 6, right-hand stripping tower. This type of upset condition needs to be minimized. Also note in the same photo the free liquid that is on the ground near the inlet line to the Benzene stripper-these types of leaks need to be eliminated.
- See photo 39 - These tanks were in temporary use by Giant at the time of the inspection. Giant did have a plastic liner underneath the tanks and is a good practice and should be continued each time that Giant uses temporary tanks to store API separator contents. However, Giant should also use a temporary earthen berm to contain $1 \frac{1}{3}$ times the tank volume.

2. Aeration Lagoon area - photos No. 8.

- During the inspection there appeared to be some sort of floating product on the aeration lagoons as well as a sludge on the rocks containing the lagoons-see photo 8. This floating scum may have been due to the lack of aeration pumps in operation -i.e. at the time of the inspection one of the pumps was down. Giant needs to maintain the condition of the lagoons-perhaps when the new waste water treatment system begins operation many of these problems will be eliminated.

3. Solar evaporation ponds area.

- The next item on the inspection was the solar evaporation ponds. The observations that follow will address the specific issues of concern to the OCD.

Mr. David C. Pavlich
Giant-Ciniza Refinery
January 18, 1996
Page 3

- A. The use of the temporary evaporation ponds will cease immediately - as was stated verbally by the OCD during the inspection.
- B. The metal posts that surround the ponds are not part of the OCD requirements for this facility upon review of the OCD file for GW-32.

Note: Giant needs to research their own records to verify this point and find out what the exact purpose of these metal posts is/was? If the posts serve no permit need of the OCD or other regulatory agency, as was requested by Mr. Shelton with Giant the metal posts should be removed. OCD agrees with this proposal but would require Giant to fill the holes with a bentonite plug to prevent the post holes from becoming conduits to the subsurface.

4. NMOCD Land Farm. (See photo number 10)

At the time of the inspection free liquids and other items such as rubber gloves and shop floor sweep were present in the land farm area.

- Free liquids are not allowed on the land farm facility permitted by NMOCD.
- Only non-hazardous and RCRA Subtitle C exempt materials are under NMOCD jurisdiction - therefore some means of assuring that only non-hazardous or RCRA Subtitle C exempt materials are placed on the NMOCD permitted land farm. Mr. Foust with the NMOCD Aztec District office did provide Giant Ciniza with some example forms for tracking the wastes to be remediated at the NMOCD permitted land farm. Mr. Shelton proposed some sort of log book to be utilized - it is the OCD Santa Fe office opinion that a form C-138 be utilized for non-exempt-non-hazardous materials and the log book be utilized for the RCRA subtitle C exempt soils. (See enclosure number 1 - form C-138)
- The disking frequency that was part of the NMOCD land farm approval was requested by Giant to be modified. Giant should address what disking frequency would be more workable in order to optimize the Bioremediation process.
- Also of concern was the site security of the NMOCD land farm - Mr. Pavlich suggested gates be put on the berms. Giant should also consider the idea of fencing the entire land farm area as well. Perhaps better tracking as discussed above would prevent non-compliance issues such as shown in photo no. 8 from occurring. Giant needs to address how the security of the NMOCD land farm will be addressed. Giant should require that all wastes placed on the NMOCD land farm be under the direct control on the Giant Ciniza Health, Safety, and Environment office.

Mr. David C. Pavlich
Giant-Ciniza Refinery
January 18, 1996
Page 4

- Treatment zone monitoring as attached as part of the NMOCD discharge plan modification - the OCD Santa Fe office has not received any of the sampling/monitoring as required in the discharge plan GW-032 modification approval dated June 14, 1995. (see enclosure no. 2 - approval letter from NMOCD dated June 14, 1995.)

5. Western tank area - photos number 11 - 19.

A. Empty drum area.

- This area needs immediate attention - drums need to be stored properly: i.e. bungs in place, with the drums on their side, and bungs horizontal to the ground.
- Note, at the time of the inspection many of the drums were partially full and the contents of many of them were unknown. Giant needs to make certain that "empty" drums are in fact empty, and those that contain usable products are stored separately on pad and curb type containment and with proper labels.
- Sump near the empty drum area needs to be cleaned annually and inspected for integrity. (see photo no. 11) Giant needs to document this sump inspection in the facility records.

B. Tank 102/101 area.

- Pumps - several centrifugal type transfer pumps are in need of better housekeeping practices. (See photo no. 13). 5 gallon buckets shall not be allowed to overflow due to pump priming operations or wind blowing the buckets off of the pump.
- Water draws need to be cleaned and inspected at least yearly and documented by Giant Ciniza. (See photo no. 14)
- No. 1 diesel tank appears to be leaking - Giant needs to propose an inspection plan for this tank in order to confirm mechanical integrity. (See photo no. 16)

C. Additive section.

- Texaco, Amoco, and Giant need to address secondary containment and pad and curb options for their respective additive areas.

D. Loading rack area.

- Long-Horizontal sumps in the loading rack area need to be cleaned and inspected yearly

Mr. David C. Pavlich
Giant-Ciniza Refinery
January 18, 1996
Page 5

and Giant must document the inspection and keep a file at the facility.

Giant also needs to propose and schedule a mechanical integrity test for the below grade piping in this area and all other OCD regulated below ground effluent, product, and waste water lines.

E. Carpenters shop area.

- Many cans/5 Gallon buckets partially full are discarded throughout this area- this situation needs to be addressed and housekeeping practices put in place to ensure proper disposal of empty paint and solvent cans and proper storage of partially used containers. (See photo no. 17 and 18)
- Benzene air stripper cleaning pad area needs better housekeeping. (See photo no. 19 and note the concrete trench in front of this area.)

II. October 5, 1995 - Lab, South east tank area, Plant process area, and Railroad loading area.

1. Lab area

- Lab wastes streams need to be characterized and stored/disposed of according to waste profile in terms of hazardous and/or non-hazardous characteristics.
- A written plan for lab employees to follow in terms of spill procedures and clean-up procedures should be prepared by Giant Ciniza.
- Mr. Pavlich proposed to eliminate many of the chemicals present in the lab area that are not needed. Giant should provide the OCD a list of chemicals that will remain in use.
- On January 16, 1996 Mr. Ed Horst Faxed the OCD a section of the 40 CFR 261.3 that discuss' exemptions from Hazardous waste regulations for certain lab facilities - Giant should follow up on this information and how it does or does not relate to this facilities lab waste stream.
- Several tanks and sample areas outside of the lab do not meet the OCD guidelines for secondary containment and pad/curb type containment. (See photos no. 20,21 and 22)

Mr. David C. Pavlich
Giant-Ciniza Refinery
January 18, 1996
Page 6

2. South east tank area

- Many of the general housekeeping concerns apply to this area - see photo no. 24 and 25. i.e. sumps/drip pans need to be maintained and inspected in order to prevent overtopping, pipe areas need to be maintained as far as spill clean-ups.

Note: Any below grade sump that is to be replaced shall have secondary containment and leak detection as part of the design.

3. Plant process area

- In general Giant has made headway as far as installing concrete pad/curb type containment throughout the entire process and appears to be headed towards covering the entire process area with pad/curb type containment. (See photo no. 23)
 - A. Caustic tanks need secondary containment. (1 1/3 volume of the tank) See photo no. 33
 - B. Brine tank needs replacement and secondary containment or placement on an elevated skid with impermeable pad/curb type containment. Salt encrusted pump near brine tank needs clean up(See photo 30, 31, and 32)

4. Railroad loading area.

- A. Former lead house - (See photo no.26) - The water contained in this area should be removed, during the inspection Mr. Pavlich stated that the water could be pumped out and into the waste water treatment system.
- B. Pipe runs in this area showed evidence of spills and needs to be cleaned up - see photo no. 27.
- C. Old railrack lagoon - see photo no. 28.
- A question of regulatory authority at this site needs to be addressed by Giant, OCD, and EPA/NMED so that the impoundment may be closed and cleaned up. A first step to this is to verify if in fact the waste that was put into the lagoon is non-hazardous or exempt - then it would appear to fall under OCD, if Hazardous it would probably fall under EPA/NMED. Giant should bring this point up with the other agencies as well as OCD so that this issue may be resolved and the lagoon closed properly so that it is protective of human health, safety, and the environment.

Mr. David C. Pavlich
Giant-Ciniza Refinery
January 18, 1996
Page 7

III. October 6, 1995 - Plant and shop/warehouse area, North tank farm, Truck stop.

1. Plant and shop/warehouse area

- The general housekeeping in this area needs to be addressed - see photo no. 34 and 35. As can be seen in these photographs spills are present throughout the area and are in need of clean-up. Also, note the drums in photo no. 34 and the oil/water mixture between buildings in photograph no. 35.

2. North tank farm - photos no. 36 through no. 43

- Piperuns and pump areas throughout this area in need of clean-up, It should also be noted that Giant has taken steps to put pad/curb type containments under many of the pumps and has cleaned under many of the piperuns-OCD understands this is an ongoing process of renovation-Giant should therefore propose a plan and time line for installing pad/curb for all pumps and a spill clean up plan to address the current spills/leaks currently on the ground in this area. The plan should address onsite/or offsite disposal options or site specific insitu remedial options.
- North empty drum areas - photo no. 39 and no. 40, Giant should look at the option of consolidating these empty drum areas with the empty drum area in the *Western Tank Area*. Provide the OCD with a description of the disposal of the empty drums.

Note: It is OCD's policy that all empty drums be stored on their side with the bungs in place and horizontal to the groundlevel.

- Tank area in general - spills/leaks need to be cleaned up, berms for the most part appear to be in compliance. See photo no. 37,38, and no. 42.

3. Truck stop

- In the fueling area all below grade sumps need to be cleaned and inspected annually and recorded at the facility by Giant Ciniza.
- Giant Ciniza also needs to propose a mechanical integrity test for the underground piping from the Truck Stop to the Refinery waste water treatment system.

IV. Other issues to be considered as part of the renewal.

Mr. David C. Pavlich
Giant-Ciniza Refinery
January 18, 1996
Page 8

1. Tank 569 Characterization Plan - see Enclosure no. 3.

- On June 14, 1995 the OCD approved of the "Tank 569 Characterization Plan" with certain conditions of approval. Upon verbal discussion with Mr. Pavlich and Mr. Shelton with Giant Ciniza the OCD will allow Giant to Amend the Approval dated June 14, 1995 to address point condition No. 2. It is now the position of the OCD that Giant should first delineate the contamination and log the geologic sections in the investigation well bores in order to determine the optimal clean-up/remmediation strategy. Note: The uncased investigatory well bores must be plugged with a bentonite/cement type grout. Also the State Engineers office and the land owner must be notified prior to drilling any wells.

2. Discharge Plan sampling and monitoring requirements.

- Giant should re-evaluate the current sampling frequency and requirements and propose a revision to the current sampling/monitoring conditions based on current data trends and cost effectiveness while considering risk to the environment and human Health and Safety.

3. Rail Spur Addition.

- If Giant is proposing to add a rail spur or any other modifications they should be included in this renewal so as to save time and money for both the OCD and Giant.

If you have any questions with regards to this inspection report feel free to contact me at (505)-827-7156 or Mr. Roger Anderson at (505)-827-7152.

Sincerely,



Patricio W. Sanchez
Petroleum Engineer

enclosure and attachment

XC: Mr. Denny Foust w/o enclosures or attachments.

Z 765 962 989



Receipt for
Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to DAVE Pavlich	
Street and No. Giant Ciniza - Inspection	
P.O., State and ZIP Code report.	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

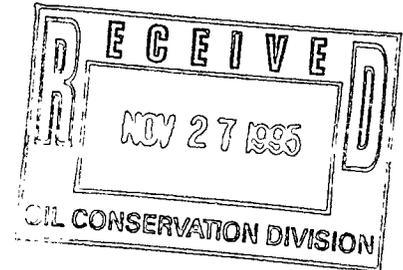
PS Form 3800, March 1993



Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

November 17, 1995



Mr. William J. LeMay
Oil Conservation Division
New Mexico Energy, Minerals, and Natural Resources Department
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Discharge Plant GW-032 Modification Fee - Landfarm Approval

Enclosed with this letter is a check in the amount of \$3,960.00 to cover the permit modification and filing fees for a modification to Giant Refining Company's OCD discharge permit GW-032 for Giant's Ciniza refinery. This fee was requested in your modification approval letter dated June 14, 1995. Due to an oversight on Giant's part, payment of this fee was inadvertently overlooked. I apologize for the delay.

Thank you for your staff's assistance in the permit modification process.

Sincerely,

David C. Pavlich
Health, Safety, and Environmental Manager
Giant Refining Company

[SRP\WPDOCS\WJL1117.95]

RECEIVED
NOV 27 1995
Environmental Bureau
Oil Conservation Division



P.O. Box 12999
Scottsdale, Arizona
85267

Bank #

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Check #

Vendor # : 71570

Check Date: 15-Nov-95

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585-8888

Div#	Inv. Date	Voucher	Invoice Number	Gross	Discount	Net
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Total:

3,960.00

MEMORANDUM OF MEETING OR CONVERSATION

✓ TELEPHONE PERSONAL TIME 8:05 (AM) / PM DATE 10/20/95

ORIGINATING PARTY: PAT SANCHEZ - NMOC

OTHER PARTIES: LYNN SHELTON - Giant

SUBJECT: Giant Ciniza Sampling - Renewal of Discharge Plan.

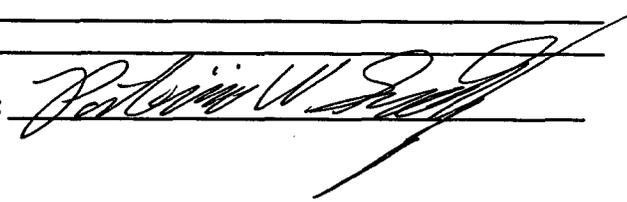
DISCUSSION: Talked about sampling methods - stressed that this is a D.P. renewal type sampling: 601/602

610
6010 - ICAP
General Chem. - Major Cation/Anions

Told him that I had talked to RGA and he could call him if he wished. Told him RGA said I could NOT FAX him the lab contract but that Giant was welcome to come to Santa Fe to view/copy it.

He said the method/sampling would be okay.

CONCLUSIONS/AGREEMENTS: Giant will sample the D.P. renewal for 601/602, 610, 6010, General Chem.

PATRICIO W. SANCHEZ: 

xc: FILE,

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application and renewal application have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505; Telephone (505) 827-7131:

(GW-223) - Americulture, Inc., Gary L. Sawright, 536 Paul Place, Los Alamos, New Mexico 87544; has submitted a discharge plan application for their geothermal heating of a fish farm

complex located in Section 7, Township 28 South, Range 18 West, NMPM, Hidalgo County, New Mexico. After heat is extracted from approximately 60,000 gallons per day of geothermal water using a heat exchanger system, the cooled effluent stream will be disposed into a shallow trench and used to supply a water source for range cattle on adjacent ranch property. The geothermal water has an average total dissolved solids content of 1,050 mg/l. The uppermost groundwater most likely to be affected by any accidental discharge is geothermal and is at a depth of approximately 523 feet with a total dissolved solids concentration of about 1,050 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-032) - GIANT REFINING Company, Mr. Lynn Shelton, (505) 722-3633, Route 3, Box 7, Gallup, New Mexico 87031 has submitted a Renewal application for the previously approved discharge plan for their Giant Refinery located in Section 28, Township 16 North, Range 18 West, NMPM, McKinley County, near Gallup, New Mexico. The Renewal application consists of the Renewal permit dated August 14, 1991 and the subsequent Modifications dated August 21, 1992, September 21, 1993, March 15, 1994, and June 13, 1995. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface varies in depth from 70 feet to 140 feet with an approximate total dissolved solids concentration of 950 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Interested persons may obtain their information from the Oil Conservation Division and may submit their comments to the Director of Oil Conservation Division at the address given above. The discharge plan applications may be reviewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday, or to any ruling on the proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons a hearing shall be held. A hearing will be held if the director determines that there is significant public interest. If a hearing is held, the Director will approve or disapprove the plan based on the information available. If a hearing is held, the Director will approve the plan based on the information presented at the hearing. Under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 30th day of August, 1995.

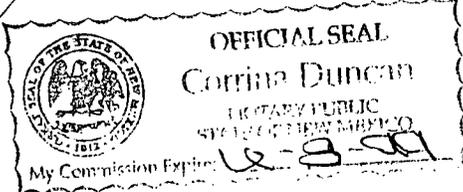
STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

STATE OF NEW MEXICO
County of Bernalillo SS

To by reprinted
10-10-95
TWB

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for One times, the first publication being of the 9 day of Sept, 1995, and the subsequent consecutive publications on _____, 1995.

should be
52'



Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 11th day of Sept, 1995

Bill Tafoya

PRICE 51.21
Statement to come at end of month.

Corinne Duncan

Should be
Section 28 and
Section 33

CLA-22-A (R-1/93) ACCOUNT NUMBER 280938

MEMORANDUM OF MEETING OR CONVERSATION

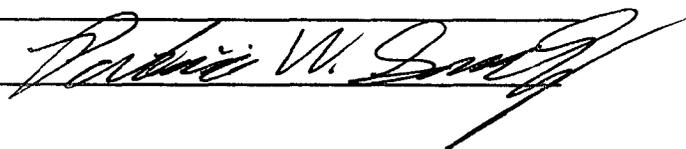
X TELEPHONE PERSONAL TIME 8:10 AM/PM DATE 9/26/95

ORIGINATING PARTY: Pat Sanchez - NMDD
OTHER PARTIES: Lynn Shelton - Giant Ciniza

SUBJECT: Sampling at Giant Ciniza - 6W-32

DISCUSSION: Inspection/Sampling asked Lynn if we could move our sampling to correspond with NMED's on Oct 24-26, 1995 and sample all the wells as part of the discharge plan renewal. We would just inspect the facility next week and not sample. Lynn said there would probably be about 19 wells - He asked what were going to sample - I told him not sure that I would have to check the files.

CONCLUSIONS/AGREEMENTS: Lynn agreed with the above information. So we will inspect the facility next WED, THUR, and FRI and then sample on Oct 24-26, 1995.

PATRICIO W. SANCHEZ: 

xc: FILE,

OIL CONSERVATION DIVISION
RECEIVED

GIANT
REFINING CO.

September 20, 1995

1995 SEP 25 AM 8 52

Route 3, Box 7
Gallup, New Mexico
87301

Bob Sweeney
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87505

505
722-3833

Re: Semi-Annual Groundwater Event

Dear Mr. Sweeney:

Giant Refining Company-Ciniza has scheduled the Semi-Annual Groundwater sampling event for October 24-26, 1995, as required by Attachment G of the facility's Part B Permit.

The following wells will be sampled for the constituents listed in Attachment G, Table G-3:

MW-1 MW-2 MW-4 MW-5 OW-11 SMW-3 SMW-4
SMW-5 SMW-6A

The wells will be purged prior to the sampling dates in order to assure sufficient recharge time.

This letter is also to inform your office that Giant has tentatively scheduled the drilling of SMW-6A and the plugging and abandonment of SMW-6 for October 2, 1995. This should provide adequate time for completion and purging activities of the new well. SMW-6A will be drilled and completed by Precision Engineering Incorporated of Las Cruces.

If you require additional information, please contact me at (505) 722 0227.

Sincerely:



Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

TLS:tls

cc: Dave Pavlich, HSE Manager, Giant Refining Company
Roger Anderson, Oil Conservation Division, Santa Fe
Denny Foust, Oil Conservation Division. Aztec

RECEIVED

SEP 26 1995

Environmental Bureau
Oil Conservation Division

Affidavit of Publication

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION
RECEIVED

) SS

COUNTY OF MCKINLEY

'95 SEP 21 11 08 52

Freida Hubbard being duly sworn upon oath, deposes and says:

As Legal Clerk of The Independent, a newspaper published in and having a general circulation in McKinley County, New Mexico and in the City of Gallup, New Mexico and having a general circulation in Cibola County, New Mexico and in the City of Grants, New Mexico and having a general circulation in Apache County, Arizona and in the City of St. Johns and in the City of Window Rock, Arizona therein: that this affiant makes this affidavit based upon personal knowledge of the facts herein sworn to. That the publication, a copy of which is hereto attached was published in said newspaper during the period and time of publication and said notice was published in the newspaper proper, and not in a supplement thereof,

for one time, the first publication being on the 7th day of September, 1995 the second publication being on the _____ day of _____, 19____ the third publication on the _____ day of _____, 19____

and the last publication being on the _____ day of _____, 19____.

That such newspaper, in which such notice or advertisement was published, is now and has been at all times material hereto, duly qualified for such purpose, and to publish legal notices and advertisements within the meaning of Chapter 12 of the statutes of the State of New Mexico, 1941 compilation.

Freida Hubbard
Affiant.

Sworn and subscribed to before me this 14th day of September, A.D., 1995

William J. Lemay
Notary Public

My commission expires
June 22, 1997

LEGAL NOTICE Gallup McKinley County New Mexico

NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application and renewal application have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505)827-7131:

(GW-223) - Americulture, Inc., Gary L. Seawright, 536 Paul Place, Los Alamos, New Mexico 87544, has submitted a discharge plan application for their geothermal heating of a fish farm complex located in Section 7, Township 25 South, Range 19 West, NMPM, Hidalgo County, New Mexico. After heat is extracted from approximately 60,000 gallons per day of geothermal water using a heat exchanger system, the cooled effluent stream will be disposed into a shallow trench and used to supply a water source for range cattle on adjacent ranch property. The geothermal water has an average total dissolved solids content of 1,050 mg/l. The uppermost groundwater most likely to be affected by an accidental discharge is geothermal and is at a depth of approximately 52 feet with a total dissolved solids concentration of about 1,050 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-032) - GIANT REFINING Company, Mr. Lynn Shelton, (505)722-3833, Route 3, Box 7, Gallup, New Mexico, 87301 has submitted a Renewal application for the previously approved discharge plan for their Ciriza Refinery located in Section 28 and Section 33, Township 15 North, Range 15 West, NMPM, McKinley County, near Gallup, New Mexico. The Renewal application consists of the Renewal permit dated August 14, 1991 and the subsequent Modifications dated August 21, 1992, September 21, 1993, March 15, 1995, and June 14, 1995. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface varies in depth from 70 feet to 140 feet with an approximately total dissolved solids concentration of 950 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing. GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of August, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
/s/ WILLIAM J. LEMAY, DIRECTOR
Legal #12232 Published in The Independent September 7, 1995.

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

NAME OF OPERATOR CINIZA PIPELINE				ADDRESS 5764 U.S. HWY 64 FARMINGTON, NM 87401					
REPORT OF	FIRE	BREAK	SPILL	LEAK <input checked="" type="checkbox"/>	BLOWOUT	OTHER*			
TYPE OF FACILITY	DREG WELL	PROD WELL	TANK BITY	PIPE LINE	GASO PLNT	OIL RFY	OTHER* PUMP STATION		
NAME OF FACILITY STANDING ROCK STATION									
LOCATION OF FACILITY (QUARTER/QUARTER SECTION OR FOOTAGE DESCRIPTION)					SEC. 22	TWP. 19N	RGE. 15W	COUNTY McKINLEY	
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK 23.1 MILES WEST OF CROWNPOINT, N.M.									
DATE AND HOUR OF OCCURENCE 9-2-95 3:30 A.M.				DATE AND HOUR OF DISCOVERY 9-2-95 11:25 A.M.					
WAS IMMEDIATE NOTICE GIVEN?		YES <input checked="" type="checkbox"/>	NO	NOT REQUIRED		IF YES, TO WHOM LEFT MESSAGE FOR DENNY FOUST			
BY WHOM ROY ARMENTA				DATE AND HOUR 9-2-95 5:30 P.M.					
TYPE OF FLUID LOST CRUDE OIL				QUANTITY OF LOSS 400 BBL		VOLUME RECOVERED 262 BBL			
DID ANY FLUIDS REACH A WATERCOURSE?		YES	NO <input checked="" type="checkbox"/>	QUANTITY					
IF YES, DESCRIBE FULLY**									
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**									
PACKING GLAND ON PIPELINE PUMP FAILED. PUMP WAS SHUT DOWN, VALVES TO AND FROM PUMP WERE CLOSED.									
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**									
OIL RAN FROM PUMP IN TWO SMALL STREAMS--WEST FOR 150 FEET, POOLED IN DIKED AREA. OIL WAS RECOVERED BY TRUCK. ABSORBENT WAS SPRINKLED ON OILY DIRT. OILY DIRT WILL BE PICKED UP, STORED ON PLASTIC, SAMPLED, THEN SENT TO COMPANY-OWNED LAND FARM IN GALLUP, N.M.									
DESCRIPTION OF AREA		FARMING		GRAZING <input checked="" type="checkbox"/>		URBAN		OTHER*	
SURFACE CONDITIONS		SANDY <input checked="" type="checkbox"/>	SANDY LOAM	CLAY	ROCKY	WET	DRY <input checked="" type="checkbox"/>	SNOW	
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**									
85° - DRY									
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF									

RECEIVED
SEP 13 1995
OIL CON. DIV.
DIST. 3

SIGNED *Roy Armenta* TITLE TECHNICAL SUPERVISOR DATE 9-5-95

*SPECIFY **ATTACH ADDITIONAL SHEETS IF NECESSARY

9/18/95
SF

Mark Ashley - Pat Scucher

GIANT
REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

OIL CONSERVATION DIVISION
RECEIVED

'95 SEP 5 AM 8 52

August 28, 1995

Denny Foust
Deputy Oil & Gas Inspector
Oil Conservation Division
1000 Rio Brazos Road
Aztec, New Mexico 87410

Re: 116 Notification: Fire

RECEIVED
AUG 30 1995
OIL CON. DIV.
DIST. 3

Dear Mr. Foust:

Pursuant to Rule 116, Giant submits this written notification of a fire that occurred at this site. The fire was quickly extinguished without injury to the fire team and without any spills or runoff. Verbal notification was made to your office at 11:40 AM on August 25, 1995.

The fire was started by burning liquid or solid material from the flare which ignited the API Separator. That area of the refinery is relatively remote from the process areas and posed little or no threat to other hydrocarbon process or storage areas. It is interesting to note that the new wastewater treatment unit that was recently approved by the OCD removes the possibility of fire from the flare.

If you have any questions or need more information, please contact me at (505) 722 0227.

Sincerely:



Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO
APPROPRIATE DISTRICT
OFFICE IN ACCORDANCE
WITH RULE 116 PRINTED
ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR Giant Refining Company					ADDRESS 140 Exit 39 Jamestown, NM			TELEPHONE # 722-3833	
REPORT OF	FIRE X	BREAK	SPILL	LEAK	BLOWOUT	OTHER*			
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY X	OTHER*		
FACILITY NAME: Ciniza Refinery									
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage NW ¼ NW ¼					SEC. 28433	TWP. 15	RGE. 15	COUNTY McKinley	
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK 17 miles east of Gallup, NM									
DATE AND HOUR OF OCCURRENCE 11:10 AM 8-25-95					DATE AND HOUR OF DISCOVERY SAME				
WAS IMMEDIATE NOTICE GIVEN?		YES X	NO	NOT RE-QUIRED	IF YES, Denny Foust, OCD, Aztec TO WHOM Air Quality Bureau, NMED				
BY WHOM Lynn Shelton and David Pavlich					DATE AND HOUR 11:40 AM 8-25-95				
TYPE OF FLUID LOST Residual Oil					QUANTITY OF LOSS ~ 5 BBLs		VOLUME RE-COVERED 0		
DID ANY FLUIDS REACH A WATERCOURSE?		YES	NO X	QUANTITY					
IF YES, DESCRIBE FULLY**									
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN** Hot particles from flare ignited residual Hydrocarbon floating on API separator. Fire was contained in API separator and extinguished with organic foam. Surrounding vessels and equipment cooled with water..									
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN** All foam and water confined to API separator. No cleanup was necessary.									
DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER* Refinery in rural area					
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY X	ROCKY	WET X	DRY	SNOW		
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)** Partly cloudy, 80°F, WSW wind @ 5 mph, soil moist from rain.									
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF									
SIGNED 				PRINTED NAME AND TITLE Lynn Shelton, Env. Coord.			DATE 8-25-95		

RECEIVED
AUG 30 1995
OIL CON. DIV.
DIST. 3

*SPECIFY SF 8/30/95

**ATTACH ADDITIONAL SHEETS IF NECESSARY

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application and renewal application have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-223) - Americulture, Inc., Gary L. Seawright, 536 Paul Place, Los Alamos, New Mexico 87544, has submitted a discharge plan application for their geothermal heating of a fish farm complex located in Section 7, Township 25 South, Range 19 West, NMPM, Hidalgo County, New Mexico. After heat is extracted from approximately 60,000 gallons per day of geothermal water using a heat exchanger system, the cooled effluent stream will be disposed into a shallow trench and used to supply a water source for range cattle on adjacent ranch property. The geothermal water has an average total dissolved solids content of 1,050 mg/l. The uppermost groundwater most likely to be affected by any accidental discharge is geothermal and is at a depth of approximately 52 feet with a total dissolved solids concentration of about 1,050 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-032) - GIANT REFINING Company, Mr. Lynn Shelton, (505)-722-3833, Route 3, Box 7, Gallup, New Mexico, 87301 has submitted a Renewal application for the previously approved discharge plan for their Ciniza Refinery located in Section 28 and Section 33, Township 15 North, Range 15 West, NMPM, Mckinley County, near Gallup, New Mexico. The Renewal application consists of the Renewal permit dated August 14, 1991 and the subsequent Modifications dated August 21, 1992, September 21, 1993, March 15, 1995, and June 14, 1995. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface varies in depth from 70 feet to 140 feet with an approximate total dissolved solids concentration of 950 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of August, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Handwritten signature of William J. Lemay in cursive script, followed by the initials "WJL" and "MES" in a stylized font.

WILLIAM J. LEMAY, Director

SEAL

OIL CONSERVATION DIVISION
RECEIVED

'95 AUG 30 AM 8 52



Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

August 28, 1995

Denny Foust
Deputy Oil & Gas Inspector
Oil Conservation Division
1000 Rio Brazos Road
Aztec, New Mexico 87410

Re: 116 Notification: Fire

Dear Mr. Foust:

Pursuant to Rule 116, Giant submits this written notification of a fire that occurred at this site. The fire was quickly extinguished without injury to the fire team and without any spills or runoff. Verbal notification was made to your office at 11:40 AM on August 25, 1995.

The fire was started by burning liquid or solid material from the flare which ignited the API Separator. That area of the refinery is relatively remote from the process areas and posed little or no threat to other hydrocarbon process or storage areas. It is interesting to note that the new wastewater treatment unit that was recently approved by the OCD removes the possibility of fire from the flare.

If you have any questions or need more information, please contact me at (505) 722 0227.

Sincerely:

A handwritten signature in black ink, appearing to read "Lynn Shelton", written in a cursive style.

Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

DISTRICT I
P.O.Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO
APPROPRIATE DISTRICT
OFFICE IN ACCORDANCE
WITH RULE 116 PRINTED
ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR Giant Refining Company					ADDRESS 140 Exit 39 Jamestown, NM			TELEPHONE # 722-3833	
REPORT OF	FIRE X	BREAK	SPILL	LEAK	BLOWOUT	OTHER*			
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY X	OTHER*		
FACILITY NAME: Ciniza Refinery									
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage NW ½ NW ½					SEC. 28433	TWP. 15	RGE. 15	COUNTY McKinley	
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK 17 miles east of Gallup, NM									
DATE AND HOUR OF OCCURRENCE 11:10 AM 8-25-95					DATE AND HOUR OF DISCOVERY SAME				
WAS IMMEDIATE NOTICE GIVEN?		YES X	NO	NOT RE-QUIRED	IF YES, Denny Foust, OCD, Aztec TO WHOM Air Quality Bureau, NMED				
BY WHOM Lynn Shelton and David Pavlich					DATE AND HOUR 11:40 AM 8-25-95				
TYPE OF FLUID LOST Residual Oil					QUANTITY OF LOSS ~ 5 BBLs		VOLUME RE-COVERED 0		
DID ANY FLUIDS REACH A WATERCOURSE?		YES	NO X	QUANTITY					
IF YES, DESCRIBE FULLY**									
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN** Hot particles from flare ignited residual Hydrocarbon floating on API separator. Fire was contained in API separator and extinguished with organic foam. Surrounding vessels and equipment cooled with water.									
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN** All foam and water confined to API separator. No cleanup was necessary.									
DESCRIPTION OF AREA		FARMING	GRAZING	URBAN	OTHER* Refinery in rural area				
SURFACE CONDITIONS		SANDY	SANDY LOAM	CLAY X	ROCKY	WET X	DRY	SNOW	
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)** Partly cloudy, 80°F, WSW wind @ 5 mph, soil moist from rain.									
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF									
SIGNED 			PRINTED NAME AND TITLE Lynn Shelton, Env. Coord.				DATE 8-25-95		

*SPECIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY

OIL CONSERVATION DIVISION
RECEIVED

'95 AUG 23 AM 8 52

RECEIVED

AUG 23 1995

Environmental Bureau
Oil Conservation Division

August 21, 1995



Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

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

Re: Discharge Plan GW-32 Renewal Request
Giant Refining Company - Ciniza Refinery
McKinley County, New Mexico

Dear Mr. Anderson:

Pursuant to the requirements of the Water Quality Control Commission (WQCC) regulations, Giant Refining Company is applying for renewal of Groundwater Discharge Plan GW-32. The application is for Giant's Ciniza refinery, which is located in Section 28 and 33, Township 15 North, Range 15 West, NMPM, McKinley County, New Mexico. The original plan was approved August 1, 1986 and was renewed on August 14, 1991. The current plan will expire on August 1, 1996.

The current plan consists of the original plan (August 1, 1986), subsequent permit modifications (December 12, 1986, March 5, 1987, and June 4, 1987 [1st modification]; February 20, 1990 [2nd modification]; and July 10 and 13, 1990 [3rd modification]), the Discharge Plan renewal (August 14, 1991) and its subsequent modifications (August 21, 1992, September 21, 1993, March 15, 1995, and June 14, 1995). There are no other changes in Giant's discharge status and no changes are anticipated within the time frame of this application and the renewal of Discharge Plan GW-32.

This application for the Groundwater Discharge Plan GW-32 is submitted pursuant to Section 3-106 of the New Mexico Water Quality Control regulations.

If you require additional information, please contact me at
(505) 722-077.

Sincerely,

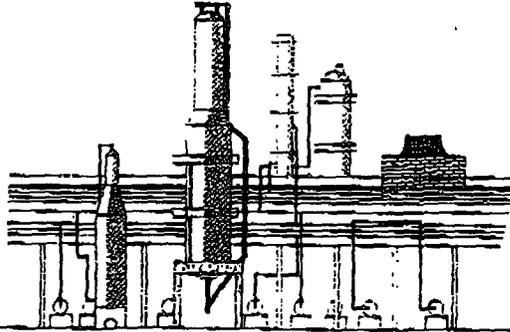


Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

cc: David C. Pavlich
Health, Safety, and Environmental Manager
Giant Refining Company

Kim Bullerdick
Corporate Counsel
Giant Industries Arizona, Inc.

(SRP)[WPDOCS\TLS\NNOCD.821]



DATE: 8-21-95

TIME: 8:06 Am

TO: PAT SANCHEZ

FROM: LYNN SHELTON

FIRM: NMOC

Giant Refining Company
Route 3, Box 7
Gallup, New Mexico

CITY: SANTA FE

FAX #: (505) 827-8177 OR SPEED DIAL # _____

We are transmitting 8 pages FOLLOWING this cover sheet.

IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE INFORM US AS SOON AS POSSIBLE AT 505/722-3833.

OUR MACHINE IS: RAPICOM 3100 at 505/722-0210
Standard _____ Detail _____

FILE REFERENCE:

COMMENTS:

THESE ARE THE FORMS AND EXAMPLES OF
FORMS THAT WE ARE TO COMPLETE, PLUS THE
CERTIFICATION FORMS THAT I GENERATED. Lynn

RETURN: _____ DO NOT RETURN: _____

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXXXXXXXX
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/> (Submitting this form for oilfield exempt waste is optional)	4. Generator	
2. Destination	5. Name of Originating Site	
3. Address of Facility Operator	6. Name of Transporter	
7. Location of Material (Street Address or ULSTR)	8. State	

9. Check One

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job.

C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved.

All transporters must certify that the wastes delivered are only those consigned for transport.

Projected Date(s) for Transportation: _____

BRIEF DESCRIPTION OF THE MATERIAL:

SUBMIT 2
COPIES TO
DENNY@ABTEC

Estimated Volume _____ yd³ Known Volume (to be entered by the operator at the end of the haul): _____ yd³
I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE _____ TITLE _____ DATE _____

TYPE OR PRINT NAME _____ TELEPHONE NO. _____

(This space for State Use)

APPROVED BY _____ TITLE _____ DATE _____

APPROVED BY _____ TITLE _____ DATE _____

CONDITIONS OF APPROVAL, IF ANY:

*Examples***GENERATORS CERTIFICATION OF
WASTE STATUS**

I hereby certify that the contents of this waste consignment are fully and accurately described above and in attached documents and that the waste is not a characteristic hazardous waste as defined by 40 CFR 261 Subpart C and is not a listed hazardous waste as defined by 40 CFR 261 Subpart D and further that the waste is not contaminated with a listed hazardous waste. I further certify under penalty of law that I have personally examined and am familiar with the information submitted in this manifest and all attached documents, and that the information is true accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibilities of fines and imprisonment.

TRANSPORTERS CERTIFICATION

I hereby certify that the waste delivered to the disposal site described above is the waste received from the generator and that no additional waste was added nor was any waste removed.

DISPOSAL CERTIFICATION

I hereby certify the receipt of the waste covered by this manifest and that the waste is authorized to be disposed of pursuant to the terms and conditions of the facility permit.

Examples

CERTIFICATE OF WASTE STATUS
OILFIELD EXEMPT WASTE

Originating Location: _____

Source: _____

Disposal Location: Envirotech Soil Remediation Facility, (ESRF)
Hilltop, New Mexico

"As a condition of acceptance for disposal, I hereby certify that this waste is an oilfield production exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. Additionally, to my knowledge, no non-exempt waste that is a "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the exempt waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned as the agent for the _____
concur with the status of the waste from the subject site.

Name _____

Title/Agency _____

Address _____

Signature _____

Date _____

Examples

CERTIFICATE OF WASTE TRANSPORT

Originating Location: _____

Source of Contamination: _____

Generator: _____

Disposal Location: Envirotech Soil Remediation Site,
Hilltop, New Mexico
Landfarm #1 _____ Landfarm #2 _____

"We, the transporters, certify the material hauled from the above location has not been added to or mixed with and is the same material received from the above mentioned Generator, and that no additional materials have been added."

Name: _____

Company: _____

Signature: _____

Date: _____

EPA WASTE CLASSIFICATION
O & G EXPLORATION AND PRODUCTION WASTES*

Oil and Natural Gas Exploration and Production Materials and Wastes Exempt by EPA from Consideration as "Hazardous Wastes" (provided non-exempt waste which is or may be "hazardous" has not been added):

Materials and Wastes Not Exempt (may be a "hazardous waste" if tests or EPA listing define as "hazardous") **:

- . Produced water;
- . Drilling fluids;
- . Drill cuttings;
- . Rigwash;
- . Drilling fluids and cuttings from offshore operations disposed of onshore;
- . Geothermal production fluids;
- . Hydrogen sulfide abatement wastes from geothermal energy production;
- . Well completion, treatment, and stimulation fluids;
- . Basic sediment and water and other tank bottoms from storage facilities that hold product and exempt waste;
- . Accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments;
- . Pit sludges and contaminated bottoms from storage or disposal of exempt wastes;
- . Workover wastes;
- . Gas plant dehydration wastes, including glycol-based compounds, glycol filters, filter media, backwash, and molecular sieves;
- . Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge;
- . Cooling tower blowdown;
- . Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream);
- . Packing fluids;
- . Produced sand;
- . Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation;
- . Hydrocarbon-bearing soil;
- . Pigging wastes from gathering lines;
- . Wastes from subsurface gas storage and retrieval, except for nonexempt wastes listed below;
- . Constituents removed from produced water before it is injected or otherwise disposed of;
- . Liquid hydrocarbons removed from the production stream but not from oil refining;
- . Gases from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons;
- . Materials ejected from a producing well during the process known as blowdown;
- . Waste crude oil from primary field operations and production;
- . Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment;
- . *Liquid and solid wastes generated by crude oil and crude tank bottom reclaimers***.*
- . Unused fracturing fluids or acids;
- . Gas plant cooling tower cleaning wastes;
- . Painting wastes;
- . Oil and gas service company wastes, such as empty drums, drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids;
- . Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste;
- . Refinery wastes;
- . *Liquid and solid wastes generated by refined oil and product tank bottom reclaimers***;*
- . Used equipment lubrication oils;
- . Waste compressor oil, filters, and blowdown;
- . Used hydraulic fluids;
- . Waste solvents;
- . Waste in transportation pipeline-related pits;
- . Caustic or acid cleaners;
- . Boiler cleaning wastes;
- . Boiler refractory bricks;
- . Boiler scrubber fluids, sludges, and ash;
- . Incinerator ash;
- . Laboratory wastes;
- . Sanitary wastes;
- . Pesticide wastes;
- . Radioactive tracer wastes;
- . Drums, insulation, and miscellaneous solids.

* Source: Federal Register, Wednesday, July 6, 1988, p.25,446 - 25,459.

** See important note on 1990 disposal restrictions for non-exempt waste on reverse.

*** See reverse side for explanation of oil and tank bottom reclaimer listings.

**CERTIFICATE of WASTE STATUS
OILFIELD NON-EXEMPT WASTE**

Originating Location: _____

Source: _____

Disposal Location: _____

"I hereby certify that the contents of this waste consignment are fully and accurately described above and in the attached documents and that the waste is not a characteristic hazardous waste as defined by 40 CFR 261 Subpart C and is not a listed hazardous waste as defined by 40 CFR 261 Subpart D and further that the waste is not contaminated with a listed hazardous waste. I further certify under penalty of law that I have personally examined and am familiar with the information submitted in this manifest and all attached documents, and that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibilities of fines and imprisonment."

I, the undersigned, as the agent for Giant Industries, Pipeline Division, concur with the status of the waste from the subject site.

Name: _____

Title: _____

Address: _____

Signature: _____

Date: _____

CERTIFICATE of WASTE TRANSPORTATION

Originating Location:

Source of Contamination:

Generator:

Disposal Location:

"We , the transporters, certify the material hauled from the above location has not been added to or mixed with and is the same material received from the above mentioned Generator, and that no additional materials have been added."

Name:

Company:

Signature:

Date:

DISPOSAL CERTIFICATION

Giant Refining Company - Ciniza

Disposal Location: _____

Source of Material: _____

Certificate of Waste Status? Yes _____ **No** _____

"I hereby certify the receipt of the waste covered by this manifest and that the waste is authorized to be disposed of pursuant to the terms and conditions of the facility permit."

Name: _____

Title: _____

Address: _____

Signature: _____

Date: _____



Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

July 28, 1995

Ronald A. Kern
RCRA Technical Compliance Program Manager
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
525 Camino De Los Marquez
Santa Fe, New Mexico 87502

Re: SMW-6 Well Replacement
Giant Refining Company - Ciniza
NMD000333211

Dear Mr. Kern:

Giant Refining Company - Ciniza (Giant) submits the following responses to the questions in the July 25, 1995 letter from your office.

Specifically, and in the order presented in your letter, those responses are:

- 1) In the 4th paragraph of your letter you state GRC's belief that the stainless steel casing in SMW-6 is damaged and that water samples from this well are similar to the water in the evaporation lagoons. Has damaged casing provided a pathway for lagoon water to reach the Ciniza Sands? Can GRC provide an analysis of the evaporation lagoon water so that HRMB can compare it to the groundwater analyses?

Giant's belief that the stainless steel casing in SMW-6 is damaged is based on observation of a separation at ~ seven feet, the occurrence of a clay/shale plug at ~ fifty feet, the ability to hear water flowing into the wellbore and the abrupt change in water analysis results. That the casing is damaged is certain. The nature of the damage and its effect on the groundwater characteristics are less clear.

Obviously, water entering the wellbore above the screened interval could potentially affect the water contained within the Ciniza Sands, assuming hydrostatic pressure is sufficient to recharge those sands. At the very least, water entering the wellbore will most certainly bias the sample and diminish the credibility of the analytical data obtained

from laboratory analysis. For that reason, Giant believes that the damaged casing could, in fact, create a pathway for water other than that produced by the Ciniza Sands to migrate into the Ciniza Sands.

The statement that the water samples obtained from SMW-6 were similar to the evaporation lagoon water is based on the fact that evaporation lagoon water is much higher in total dissolved solids and electro-conductivity and of lower pH than water samples obtained from the Ciniza Sands (see attached analytical data).

Please note that the levels of salts, TDS, and pH in a given sample will vary in direct proportion to the levels in the ponds (due to evaporation). For example, a sample taken near the end of the evaporation season when water levels are extremely low will be considerably higher in some constituents than a sample taken when ponds are full).

- 2) In the 5th paragraph of your letter you suggest earth moving activities in the evaporation lagoons adjacent to SMW-6 may have exposed a route for lagoon water to migrate to the Ciniza Sands. Could you explain in greater detail what you have in mind?

Giant assumes that in reconditioning the evaporation lagoons immediately adjacent to SMW-6 that a sand stringer or similar porous formation may have been exposed. In that the depth increase in the pond was minimal, the possibility of exposing a pathway to the Ciniza Sands is remote. Nevertheless, in trying to imagine all of the potential reasons for the change in the characteristics of water from SMW-6, this was considered a possibility.

It is also conceivable that the well casing may have been physically damaged by some of the earthmoving equipment, either by striking the steel protective well casing or the concrete pad the surrounds it.

- 3) In the 6th paragraph you propose drilling an offset monitoring well prior to plugging and abandoning SMW-6. Unless SMW-6 is providing a conduit for contaminants to reach groundwater, HRMB sees no reason to plug it. The new monitoring well, if approved, will need to be designed and constructed similar to the existing SMW-6 (with the obvious difference in casing materials). The U.S. Environmental Protection Agency's RCRA GROUNDWATER MONITORING: DRAFT TECHNICAL GUIDANCE, November 1992 contains the guidelines for design, construction and development of a monitoring well.

Giant is committed to plugging and abandoning SMW-6, before drilling

SMW-6A. As SMW-6 will serve no purpose, Giant is reluctant to leave an open pathway, from either the surface or the subsurface, to a zone that is used to monitor the potential migration of hazardous constituents from the Land Treatment Area.

The design of the new well, SMW-6A, is an improvement on the well design and construction of SMW-6, primarily because it will have a sand pack around the screened interval as opposed to a gravel pack. The well design for SMW-6A that was submitted to HRMB in the July 6, 1995 letter is consistent with the requirements of the New Mexico Oil Conservation Division and, again, exceeds the design/construction specifications of SMW-6. A more detailed list of construction features is included in the following response.

- 4) In the 8th paragraph you state GRC does not consider the abandonment of SMW-6 and its replacement with SMW-6A to be permit modifications. Because the proposed well, SMW-6A, will replace a monitoring well which may be damaged and/or will have a different design than the existing well, SMW-6, a permit modification may be required. Please submit a more detailed diagram (e.g. where the centralizers will be placed, slot size, thickness and location of bentonite plug above the slotted screen, height of top of casing above ground level, radius of concrete pad, etc.) than the well diagram sent with your July 6 letter.

Giant still does not believe that the replacement of SMW-6 with SMW-6A should be a permit modification. Although technically the design of SMW-6A is an improvement on the design of SMW-6, the function of the well within the permit is exactly the same. The same constituents, sampling interval (Spring/Fall), geologic formation, and reporting requirements of SMW-6A are identical to those of SMW-6. Only the physical location of the wellbore will change very slightly.

A list of construction details of SMW-6A are listed below:

Total depth	72' to 75'
Casing size and type	2" PVC (flush screw joints)
Sand packing	16 - 40 sand
Screened casing	.010" slots
Bentonite seal-bottom	≥ 3' bentonite pellets
Bentonite seal-top	3' bentonite pellets (immediately above sand pack)
Height of casing	36" above ground level
Steel protective casing	2' into grout
Cement pad	36" x 36" x 6"
Screened interval	Ciniza Sand formation only

Centralizers

Stainless steel - bottom of pipe,
top of screen, and every 20' to
surface

The cement pad will be 3' x 3' x 6" and sloped away from the protective casing. The protective casing will be installed 2' into the grout. A locking cap will be installed on the protective casing. A centralizer will be installed at the bottom of the casing, at the top of the slotted screen casing and at $\geq 20'$ intervals to the surface.

After installation of the well is complete, the formation will be surged and developed. After development activities are complete, the dedicated pump (presently in SMW-6) will be decontaminated and installed in SMW-6A. Water samples for analysis are expected to be taken in conjunction with the semi-annual groundwater sampling event in late September or October provided that HRMB approval for this replacement is received in time to complete the project prior to the Fall sampling event.

Giant hopes that the responses contained in this letter adequately answer your inquiries. If you need additional information, please contact me at (505) 722-0277.

Sincerely,



Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

cc: David Pavlich, HSE Manger, Giant Refining Company
Kim Bullerdick, Corporate Counsel, Giant Industries Arizona, Inc.
Roger Anderson, NMOCD



July 28, 1995

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

Mr. Ed Kelley, Director
Water and Waste Management Division
New Mexico Environment Department
525 Camino De Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Kelley:

Earlier this week, I sent you a letter (copy attached) at the direction of Benito Garcia of the Hazardous and Radioactive Materials Bureau (HRMB) requesting your approval to remove several listed items from Giant Refining's Part A RCRA permit. Those items are the API separator and the benzene stripping units. In subsequent discussions with HRMB staff, an additional item was identified as being a good candidate for removal from the Part A Permit. This item is a small hazardous waste drum storage area. Since this area was never constructed and Giant does not foresee a need for it in the near future, its removal from the Part A Permit is appropriate.

Therefore, in addition to the items listed in Giant's letter of July 24, 1995, Giant also requests approval for the removal of the hazardous waste container storage area from its Part A Permit. Upon receipt of your approval, Giant will submit an application for permit modification to the HRMB.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "David C. Pavlich".

David C. Pavlich
Health, Safety, and Environmental Manager

cc: Roger Anderson, OCD
Michael Chacon, HRMB
Ron Kern, HRMB
Lynn Shelton, Giant

[SRP\WPDOCS\PAV\NMED.728]



Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

July 24, 1995

Mr. Ed Kelley, Director
Water and Waste Management Division
New Mexico Environment Department
525 Camino De Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Kelley,

Giant Refining recently requested a modification to its Part A RCRA Permit. In reviewing this modification request, the Hazardous & Radioactive Materials Bureau (HRMB) staff determined that several items listed on Giant's Part A Permit (the API separator and benzene stripping units) should not have been included in the permit since they are part of a process wastewater treatment system and are regulated by the Oil Conservation Division.

Therefore, at the request of the HRMB, Giant hereby requests removal of the abovementioned API separator and benzene stripping units from its Part A Permit. Upon your approval of this request, Giant will submit to the HRMB a revised Part A Permit excluding these units.

Enclosed with this letter is a copy of HRMB Chief Benito Garcia's letter detailing the HRMB staff's findings and his request that Giant seek removal of these units from its Part A Permit.

Should you or your staff have any questions regarding the above, please do not hesitate to contact me or Mr. Lynn Shelton at (505) 722-3833. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "David C. Pavlich".

David C. Pavlich
Health, Safety, and Environmental Manager



OIL CONSERVATION DIVISION
Route 3, Box 7 RECEIVED
Gallup, New Mexico
87301 95 AUG 2 2 AM '85

505
722-3833

July 28, 1995

James Harris
Hazardous Waste Management Division
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Survey Plats

Dear Mr. Harris:

Pursuant to the requirements of 40 CFR 264.116, Giant Refining Company - Ciniza submits the enclosed survey plats for SWMUs #1, 3, 8, 9, and 13.

Please note that Giant is aware of the requirement to prominently display a note, stating the obligation to restrict disturbances of each SWMU, with the survey plats submitted to the local zoning authority. Giant believes that the authority for our location will be McKinley County.

If you require additional information, contact me at (505) 722-0227.

Sincerely,

Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

cc w/attachment: Kathleen Sisneros, NMED
Roger Anderson, NMOCD
Gallup Public Library

cc w/o attachments: Kim Bullerdick, Corporate Counsel
Giant Industries Arizona, Inc.

David Pavlich, HSE Manager
Giant Refining Company

[SRP\WPDOCS\TLS\USEPA.728]



Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

July 26, 1995

James Harris
Hazardous Waste Management Division
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Report on the March 1995 RFI sampling activities
Giant Refinery - Ciniza NMD000333211

Dear Mr. Harris:

Giant Refining Company - Ciniza (Giant) submits the Report on the March 1995 RFI Sampling Activities.

If you have any questions about this report or require additional information, please do not hesitate to call me at (505) 722-0227.

Sincerely:

A handwritten signature in cursive script, appearing to read "Lynn Shelton".

Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

cc: Kim Bullerdick, Corporate Counsel, Giant Industries Arizona,
Inc.
Kathleen Sisneros, NMED
Roger Anderson, NMOCD
Gallup Public Library

{TA\WP\LB\REPJUL}



Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

July 25, 1995

Patricio W. Sanchez
Environmental Bureau
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Re: Benzene Stripper Drawings

Dear Mr. Sanchez:

Please find enclosed the drawings of the benzene air strippers at Giant's Ciniza Refinery.

An early drawing, from 1991, and a more recent drawing are included. The most recent drawing shows the piping changes made in mid-1994 to enhance flows.

Hopefully you will find this information useful.

Sincerely:

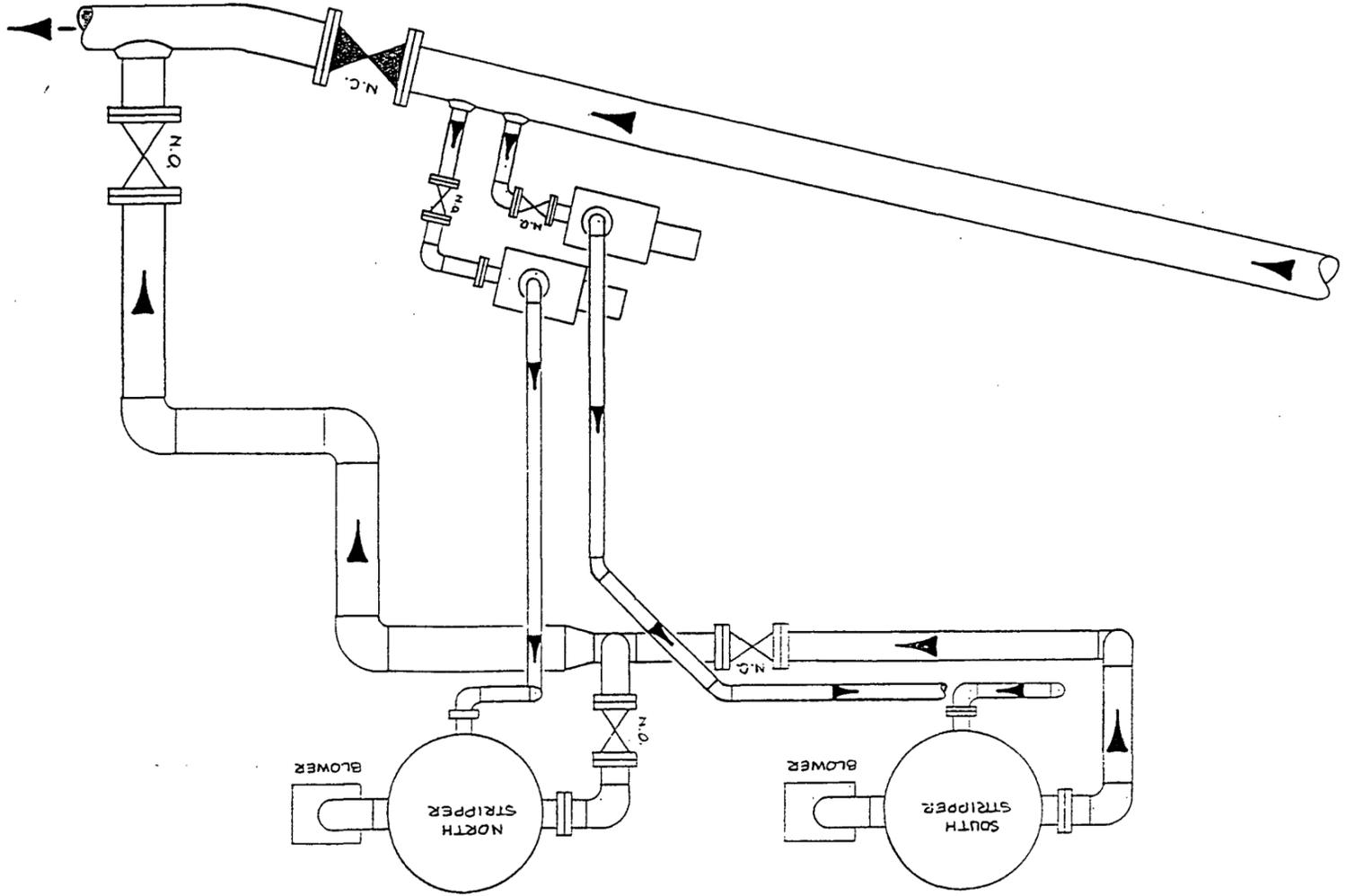
A handwritten signature in black ink, appearing to read "Lynn Shelton", with a long horizontal line extending to the right.

Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

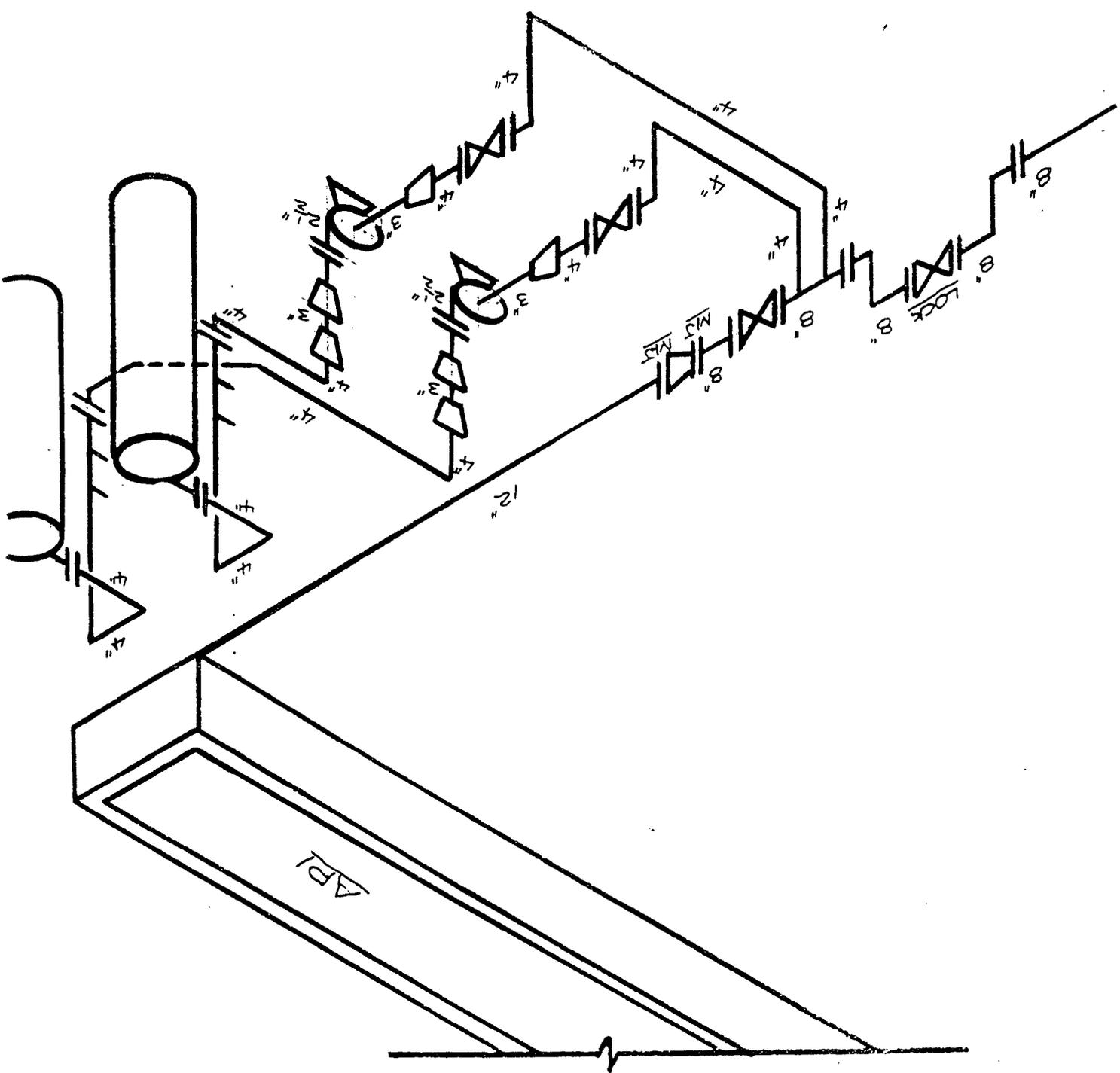
{TA\WP\LS\BARCHEZ}

GIANT REFINING CO.
BENZENE STRIPPER
PIPING PLAN
NOT TO SCALE
JAN. 1991

TO
PARSHALL
FLUME



FROM
A.P.I.
SEPARATOR



PUMP SECTION



Oil Conservation Division
RECEIVED

Route 3, Box 7
Gallup, New Mexico
87301

'95 JUL 31 AM 8 52

505
722-3833

July 24, 1995

Mr. Ed Kelley, Director
Water and Waste Management Division
New Mexico Environment Department
525 Camino De Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Kelley,

Giant Refining recently requested a modification to its Part A RCRA Permit. In reviewing this modification request, the Hazardous & Radioactive Materials Bureau (HRMB) staff determined that several items listed on Giant's Part A Permit (the API separator and benzene stripping units) should not have been included in the permit since they are part of a process wastewater treatment system and are regulated by the Oil Conservation Division.

Therefore, at the request of the HRMB, Giant hereby requests removal of the abovementioned API separator and benzene stripping units from its Part A Permit. Upon your approval of this request, Giant will submit to the HRMB a revised Part A Permit excluding these units.

Enclosed with this letter is a copy of HRMB Chief Benito Garcia's letter detailing the HRMB staff's findings and his request that Giant seek removal of these units from its Part A Permit.

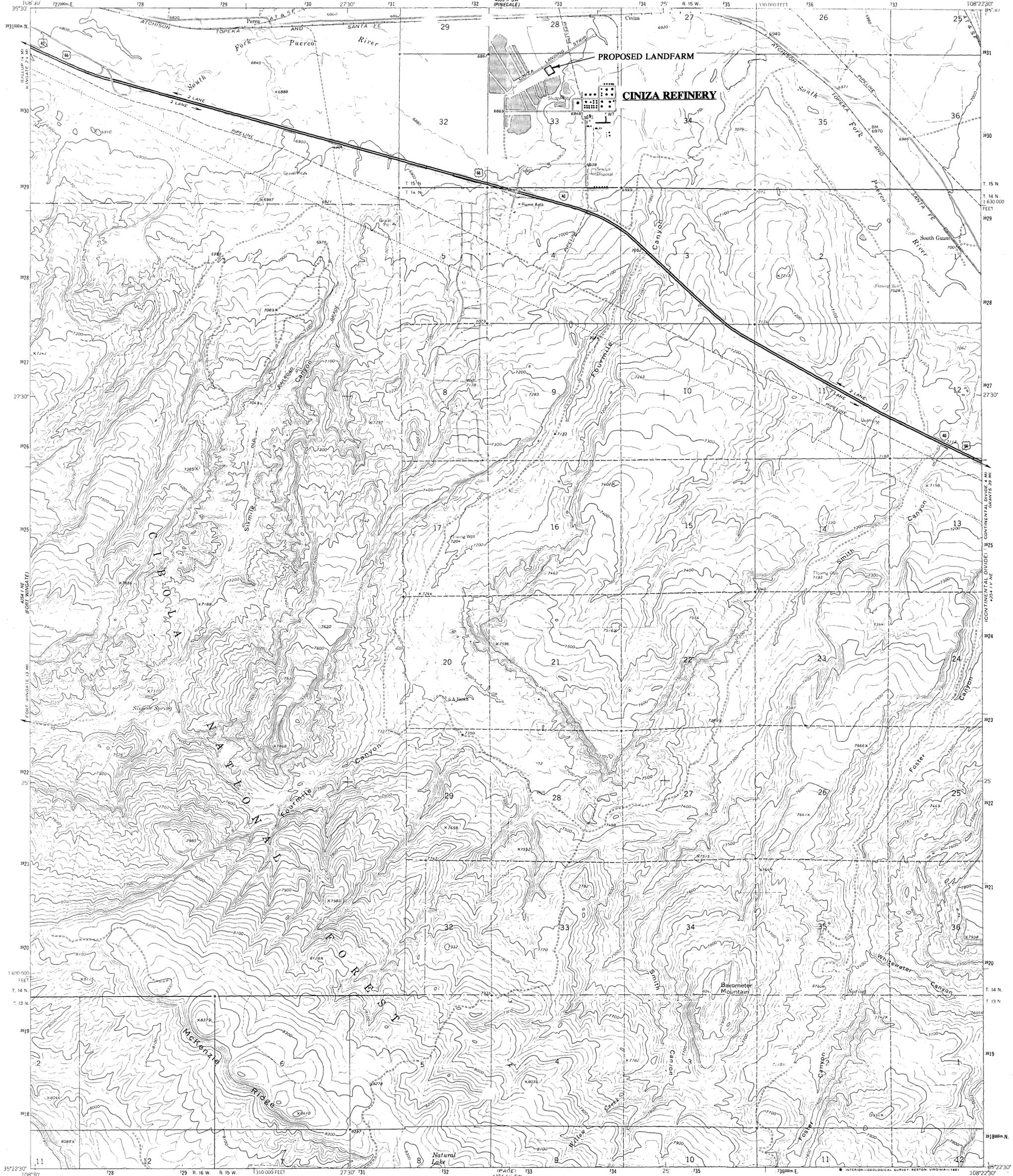
Should you or your staff have any questions regarding the above, please do not hesitate to contact me or Mr. Lynn Shelton at (505) 722-3833. Thank you for your assistance in this matter.

Sincerely,

David C. Pavlich
Health, Safety, and Environmental Manager

cc w/enclosure: Lynn Shelton, Giant

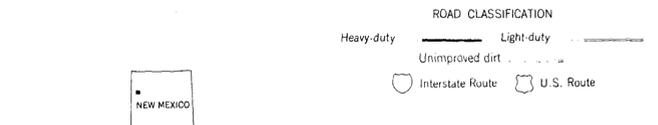
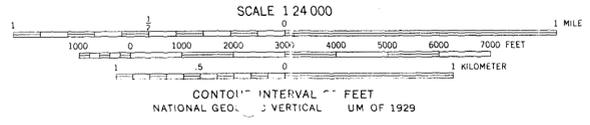
cc w/o enclosure: Roger Anderson, OCD Bureau Chief
Michael Chacón, HRMB, RCRA Permits
Ron Kern, HRMB Program Manager



Mapped, edited, and published by the Geological Survey

Control by USGS and NOS/NOAA
Topography by photogrammetric methods from aerial photographs taken 1961. Field checked 1962.
Polyconic projection. 1927 North American datum 10,000 foot grid based on New Mexico coordinate system, west zone 1000-meter Universal Transverse Mercator grid ticks, zone 12, shown in blue.
Fine red dashed lines indicate selected fence lines. Where omitted, land lines have not been established.
To place on the predicted North American Datum 1983 move the projection lines 57 meters east as shown by dashed corner ticks.

UTM GRID AND 1980 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET
There may be private inholdings within the boundaries of the National or State reservations shown on this map.



THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225 OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions shown in purple compiled from aerial photographs taken 1978 and other source data. This information not field checked. Map edited 1980.

CINIZA, N. MEX.
N3522.5-W10822.5/7.5
1962
PHOTOREVISED 1980
DMA 4354 IV NW-SERIES V881