GW - 32

INSPECTIONS & DATA

2001 / 1997

GIANT REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

October 18, 2001

Mr. Wayne Price
Petroleum Engineering Specialist
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, NM 87505

Re: Ciniza Refinery GW-032
Discharge Plan Renewal Inspection

Dear Mr. Price:

This correspondence is in response to your letter of September 26, 2001 summarizing the results of the OCD's inspection of Giant's Ciniza Refinery on August 23, 2001. The following represents a status report on the progress that has been made to address the various issues listed in your letter. The items below are listed in the same order as presented in the Division's letter.

1. The old acid (HCL) storage tank area and the old monitor well in the area east of the cooling towers.

Soil samples were gathered from these and adjacent areas and field analyzed for pH levels in order to screen for any un-neutralized acids or bases. Both surface and subsurface (6" – 12") samples were taken. The results of these tests are as follows:

East of old acid tank site (i.e., in the direction of surface drainage) at the surface – pH 7
East of old acid tank site (subsurface) – pH 7
Inside old acid tank bermed area (surface) – pH 8
Inside old acid tank bermed area (subsurface) – pH 7
Near old well site (OW-20) east of the cooling towers (surface) – pH 7
Near old well site (subsurface) – pH 7

In addition to the above soil samples, the standing water in the small drainage ditch catch basin east of the cooling towers and acid storage area was sampled. Its pH level was 7.

A work ticket was submitted to have the old acid tank area smoothed so that the small remaining berm would not retain stormwater in that location.

2. The water discharge to the ground near the Gas Concentration Unit.

The over spray of steam condensate water onto the aerial coolers in this area was corrected the same day that is was noted during the inspection and the runoff onto the surrounding soil was eliminated.

3. The storage of methanol drums in the FCC area.

Because methanol storage at the Ciniza Refinery has been converted from a drum-based system to a tote-type system, a work ticket was issued shortly after the inspection to transfer the contents of the three methanol drums found in the FCC Unit to one of the bulk storage totes at the facility.

4. The below-grade "tank" at the old fuel oil unloading area outside the northeast corner of the dike at the Hot Oil Tank Farm.

This shallow drip-catch sump has been added to the facility's list of below grade sumps scheduled for annual inspections.

5. The Hot Oil Tank Farm where oil and water was being discharged to the ground.

Work tickets have been issued and work is underway to clean up the standing water and oil that had accumulated in portions of the HOTF and to repair the steam, water, and heavy oil leaks which had caused these accumulations.

6. The Rail Road Rack lagoon excavated area had standing fluids in it.

The standing water which had collected in this area following recent rains has been removed from the excavation.

7. All waste streams and disposal methods shall be included in the discharge plan submittal including Rule 712 waste.

All waste streams have been or are being identified and analyzed and their various disposal locations have been or are being established. This information will be included in the materials submitted by Giant as part of the Ciniza Discharge Plan renewal information.

We did happen to notice one apparently mislabeled picture in the photographs you included with your letter. Picture #9 is listed as being from the area between tanks 345, 344, and 337. In examining the picture more closely, it appears that the area shown is actually part of the HOTF area where some heavy oil FCC feed had collected on top of a puddle of standing water.

Should you have any questions regarding the above status report, please do not hesitate to contact me at 505-722-0217.

Sincerely,

David C. Pavlich

David C. Pavlich
Environmental Superintendent
Giant Refining Company

RECEIVED

OCT 2 2 2001

OIL CONSERVATION
DIVISION

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

September 26, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5357 7584

Ms. Dorinda Mancini
Environmental Manager
Giant Refining Co.
Route 3, Box 7
Gallup, NM 87301

RE: Ciniza Refinery GW-032
Discharge Plan Renewal

Dear Ms. Mancini:

The New Mexico Oil Conservation Division (OCD) conducted a discharge plan inspection on August 23, 2001 for the above captioned facility. Per your request, the results of the inspection are enclosed and OCD requires Giant Refining Co. to address the following issues:

1. The Old Acid (HCL) storage tank area (picture #1). and the old monitor well in this area.

2. The water discharge to the ground near the Gas Concentration Unit (picture #2).

3. The storage of methanol drums in the FCC area (picture #3).

4. The below-grade tank at the old fuel oil unloading catch tank (picture #4).

5. The Hot Oil Tank Farm where oil and water is being discharged to the ground. (see pictures #5-9).

6. The Rail Road Rack lagoon excavated area has standing fluids in it (picture #10). This area has visual contaminates that may seep into the groundwater.

7. All waste streams and disposal methods shall be included in the discharge plan submittal including Rule 712 waste. In order for OCD to approve 712 D(2) and D(3) waste as part of the discharge plan OCD requires that Giant submit the analytical results or knowledge of process to verify each waste stream meets the testing and other requirements of Rule 712. Any waste not listed in the discharge plan shall be approved on a case-by-case basis.

OCD may require additional actions to be taken along with additional operating conditions in the discharge plan. Also, Giant Refining Co. is hereby required to submit a completed discharge plan for OCD review by December 03, 2001.

If you have any questions please do not hesitate to contact me at 505-476-3487.

Sincerely,

Wayne Price-Pet. Engr. Spec.
cc: OCD Aztec Office

Attachments-1

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 8/23/01 Time: 7:45 AM

Type of Facility: Refinery ☑ Gas Plant ☐ Compressor St. ☐ Brine St. ☐ Oilfield Service Co. ☐
Surface Waste Mgt. Facility ☐ E&P Site ☐ Crude Oil Pump Station ☐
Other ☐ _____

Discharge Plan No ☐ Yes ☐ GW# 032

FACILITY NAME: GIANT CINIZA REFINERY - 6500 BBL/DAY NGL'S 23000 BBL/DAY CRUDE

PHYSICAL LOCATION: 17 mi EAST of GALLUP I-40 Exit 39

Legal: QTR___QTR___ Sec___ TS___ R___ County McKINLEY

OWNER/OPERATOR (NAME) GIANT IND. - AZ INC

Contact Person: DORINDA MANCINI Tele:# 722-3833

MAILING ADDRESS: Rt 3 Box 7 GALLUP 87 State NM ZIP 87301

Owner/Operator Rep's:
DAVE PATTLICH, DORINDA MANCINI

OCD INSPECTORS: W PRICE

1. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

PIC #3 - METHANOL DRUMS IN FCC AREA - NEED PROPER CONTAINMENT

2. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

PIC #1 - OLD HCL TANK AREA / OWS20 AREA (CAUSTIC PROBLEM) CONCENTRATION FEED WATER
PIC #2 - ONE of PLANT GAS ~~TREATMENT~~ UNIT - BOILER ~~CONDENSATE~~ DISCHARGING TO GROUND - PH MEASURED 7

3. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

HOTF HOT OIL TANK FARM -

PIC #5 - FUEL OIL PUMP BASIN PIC #7 FCC TK 703-

PIC #8 - PIPE RACK BETWEEN TK 703 & 704

PIC #6 - FUEL OIL TK # 706 (N SIDE) VALVE AREA - HOT WATER LEAK HEAVY OIL & WATER ON GROUND

3' CONT

~~4. Above Ground Saddle Tanks:~~ Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

PIC # 9 - HOTF AREA FREE OIL ON GROUND -

SEVERAL OIL & WATER LEAKS IN WHOLE AREA (345) (334)

BETWEEN TK 704 & 702 RW-6

PIC # 15 - TANK FARM RW-5 & RW-6 (TK 345) RW-5 (337)

N

5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

PIC # 4 - BGT OLD FUEL OIL UNLOADING CATCH TANK W/ STEAM TRAP NEED TO LIST ON DP

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

- OLD SYSTEM UNDER RENVOVATION -

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly?

Does the facility have an EPA hazardous waste number? _____ Yes _____ No

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? (YES) NO IF NO DETAIL BELOW.

DISCUSSED RULE 712

9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO ☑ YES ☐ IF YES DESCRIBE BELOW ! Undetermined ☐

10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

FAIR - NEEDS IMPROVEMENT

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

12. Does the facility have any other potential environmental concerns/issues?

SWMU #8 pic # 10 RR LAGOON AREA; pic # 11 RR LAGOON LANDFARM
pic # 12 CONTAMINATED SOILS FROM FIRE TRAINING AREA AND SECONDARY OIL SKIMMER ALL NON-HAZARDOUS

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

SPCC - YES SW - YES

14. ANY WATER WELLS ON SITE? NO ☐ YES ☑ IF YES, HOW IS IT BEING USED ?

(4) ON SITE - WILL INCLUDE IN DP

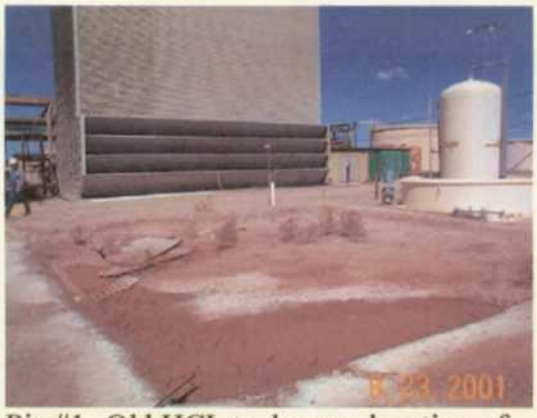
15. Documents reviewed:

Miscellaneous Comments:

pic # 14 POND # 11
pic # 13 TEMP EMERGENCY POND
RW-1, 5, & 6 HAS PRODUCT - BAILING ONCE/WK RW-2 - WATER
RW-3 & 4 - (DEEPER MW'S) - CLOSED

Photos taken:

Documents Reviewed/Collected: PROCESS FLOW DIAGRAM, POND PLOT PLAN, TANK FARM LAYOUT



Pic #1- Old HCL tank area- location of old monitor well OW20 had high PH readings.

Pic #4- Below-Grade Tank (BGT) old fuel oil unloading catch tank with steam trap.

Pic #2- water discharge to ground. Area located NE of plant gas concentration unit. PH of water was measured at 7

Pic #5- Fuel Oil Pump Basin

Pic # 3- Methanol drums in FCC area- need proper containment.

Pic #6- North side Fuel Oil Tank #706


Pic #9- Area between tanks 345,344 and 337.

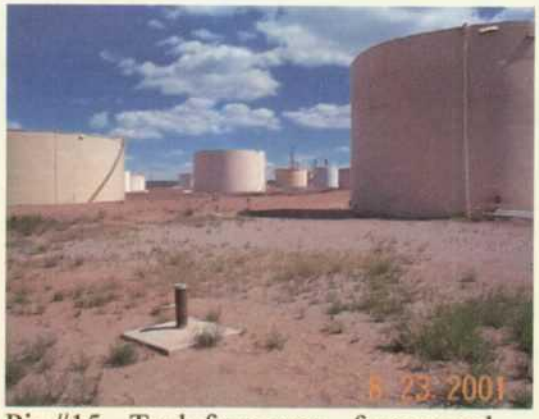
Pic #7- FCC tank 703

Pic # 10- Railroad Rack Lagoon area.

Pic #8- Pipe Rack between Tank # 703 & 706 area free oil on ground.

Pic #11- Railroad Rack Lagoon landfarm area.

Pic #12 Contaminated spoils from fire training area and secondary oil skimmer (all non-hazardous).



Pic #15- Tank farm area- foreground shows current recovery well #5 (RW-5).

Pic #13- Old Temporary Emergency Pond far NW side of property.

Pic #14- Pond #11

State of New Mexico
ENVIRONMENT DEPARTMENT
Surface Water Quality Bureau
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0187

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

Certified Mail - Return Receipt Requested

April 23, 1997

Mr. Richard Platt
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

RE: Compliance Evaluation Inspection, Giant Refinery-Ciniza, NPDES Permit #NMR00A172, February 26, 1997

Dear Mr. Platt:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by EPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both USEPA and NMED regarding modifications and compliance schedules.

My thanks to Mr. David Pavlich and Ms. Dorinda Mancini of your staff for their help and cooperation during this inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 827-2798.

Sincerely,

Richard E. Powell
Surface Water Quality Bureau

xc: USEPA, Dallas (2 copies)
Taylor Sharpe, USEPA (6EN-WT)
NMED, District I, Albuquerque, Gallup Field Office
NMOCD, Roger Anderson

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

1	2	3	11	12	17	18	19	20
Transaction Code		NPDES		yr/mo/day		Inspec. Type	Inspector	Fac Type
N	5	NMR00A172		970226		C	S	2

Remarks: SIC2911 PETROLEUM REFINERY

67	70	71	72	73	74	75	80
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved			
	2	N	N				

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Giant Refining Co.-Ciniza Refinery - east of Gallup Ex. 39 off I 40 - behind Travel Center Route 3, Box 7, Gallup, McKinley County, NM 87301

Entry Time /Date: **0755/2-26-97**

Permit Effective Date: **9-9-92**

Exit Time/Date: **1500/2-26-97**

Permit Expiration Date: **9-9-97**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

***David C. Pavlich/Mgr., Health Safety and Environment,**
***Dorinda Mancini/Environmental Manager 505-722-0217**

Other Facility Data: **Lat. 34 29 26 Long. 108 25 24**

Name, Address of Responsible Official/Title/Phone and Fax Number

Richard Platt/General Manager/505-722-0202/505-722-0210

Contacted: Yes [*] No [ ]

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	U	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
M	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. **Permittee has coverage under the NPDES baseline general storm water permit and has a Storm Water Pollution Prevention Plan (SWPP).**
2. **The description of potential pollutant sources in the SWPPP and on the site map is incomplete.**
3. **The permittee has installed storm water runoff controls per the SWPPP in many areas of the plant site but, some areas with a high potential for contributing pollutants to storm water discharges are not controlled.**
4. **The permittee has not conducted the required site compliance evaluations for the past two years.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Richard E. Powell	NMED/SWQB/505-827-2798	4-23-97
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date

Storm Water Industrial General Permit
Pollution Prevention Plan

CHECKLIST

Giant Refinery - Ciniza	DATE: 2-26-97	PERMIT NO NMOOROOA172

POLLUTION PREVENTION TEAM

MEETS PERMIT REQUIREMENTS. S☐ M☒ U☐ N/A☐ (FURTHER EXPLANATION ATTACHED Yes)
DETAILS: Not updated since 3-30-93 - numerous personnel changes

1. IDENTIFY SPECIFIC INDIVIDUALS. Y☒ N☐ N/A☐

2. OUTLINE INDIVIDUALS RESPONSIBILITIES. Y☒ N☐ N/A☐

DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

MEETS PERMIT REQUIREMENTS. S☐ M☐ U☒ N/A☐ (FURTHER EXPLANATION ATTACHED yes)
DETAILS:

1. SITE MAP INDICATING. S☐ M☒ U☐ N/A☐

a) DRAINAGE AREAS Y☐ N☒ N/A☐

b) DRAINAGE PATTERNS AND OUTFALLS Y☒ N☐ N/A☐

c) STRUCTURAL AND NON-STRUCTURAL CONTROLS no structural controls Y☐ N☒ N/A☐

d) SURFACE WATERS separate map Y☒ N☐ N/A☐

e) SIGNIFICANT MATERIALS EXPOSED TO PRECIPITATION Y☐ N☒ N/A☐

f) LOCATION OF LEAKS/SPILLS WHICH HAVE OCCURED IN THE LAST 3 YEARS 1 occurance Y☐ N☒ N/A☐

g) LOCATION OF INDUSTRIAL ACTIVITIES EXPOSED TO PRECIPITATION Y☒ N☐ N/A☐

FUELING STATIONS not marked Y☒ N☐ N/A☐

MAINTENANCE OR CLEANING AREAS not marked Y☒ N☐ N/A☐

LOADING/UNLOADING AREAS 1 marked, 1 not marked Y☒ N☐ N/A☐

WASTE TREATMENT,STORAGE OR DISPOSAL AREAS water treatment not marked Y☒ N☐ N/A☐

LIQUID STORAGE TANKS not marked but on SPCC list Y☒ N☐ N/A☐

PROCESSING AREAS not all Y☐ N☒ N/A☐

STORAGE AREAS not marked/not all Y☐ N☒ N/A☐

2. LIST OF POLLUTANTS LIKELY TO BE PRESENT IN DISCHARGES. not in some areas S☐ M☐ U☒ N/A☐

3. DESCRIPTION OF SIGNIFICANT MATERIALS HANDLED, TREATED, STORED OR DISPOSED OF SUCH THAT EXPOSURE TO STORM WATER OCCURED IN THE LAST 3 YEARS. S☒ M☐ U☐ N/A☐

a) DESCRIPTION OF THE METHOD AND LOCATION OF STORAGE OR DISPOSAL Y☒ N☐ N/A☐

b) DESCRIPTION OF ALL MATERIAL MANAGEMENT PRACTICES Y☒ N☐ N/A☐

c) DESCRIPTION AND LOCATION OF EXISTING STRUCTURAL AND NON-STRUCTURAL CONTROLS none in some areas Y☒ N☐ N/A☐

4. SUMMARY OF EXISTING STORM WATER SAMPLING DATA none done since 1992 S☐ M☒ U☐ N/A☐

5. DESCRIPTION OF AREAS WITH A HIGH POTENTIAL FOR SIGNIFICANT SOIL EROSION S☐ M☒ U☐ N/A☐

6. A NARRATIVE SUMMARIZING POTENTIAL POLLUTANT SOURCES sources in some areas not identified S☐ M☐ U☒ N/A☐

Storm Water Industrial General Permit
Pollution Prevention Plan

CHECKLIST

Giant Refinery - Ciniza	DATE: 2-26-97	PERMIT NO. NMR00A172

DESCRIPTION OF APPROPRIATE MEASURES AND CONTROLS

MEETS PERMIT REQUIREMENTS. S☐ M☐ U☒ N/A☐ (*FURTHER EXPLANATION ATTACHED* Yes)
DETAILS:

1. GOOD HOUSEKEEPING PROCEDURES. S☐ M☒ U☐ N/A☐
2. PREVENTIVE MAINTENANCE PROCEDURES. need to reference where records are kept S☐ M☒ U☐ N/A☐
3. SPILL PREVENTION AND RESPONSE PROCEDURES. From SPCC S☒ M☐ U☐ N/A☐
4. INSPECTION PROCEDURES. not recorded S☐ M☒ U☐ N/A☐
5. EMPLOYEE TRAINING PROGRAM. done 2/yr. in safety training -not in SWPPP S☐ M☒ U☐ N/A☐
6. RECORDKEEPING AND INTERNAL REPORTING PROCEDURES S☐ M☐ U☒ N/A☐
7. NON-STORM WATER DISCHARGE CERTIFICATION. not done, not signed by Manager S☐ M☐ U☒ N/A☐
   a) IDENTIFY AUTHORIZED NON-STORM WATER DISCHARGES AND APPROPRIATE CONTROLS Y☐ N☒ N/A☐
8. EROSION AND SEDIMENT CONTROLS FOR AREAS WITH HIGH EROSION POTENTIAL. S☐ M☒ U☐ N/A☐
9. A NARRATIVE CONSIDERATION OF TRADITIONAL STORM WATER MANAGEMENT PRACTICES. for some areas S☐ M☒ U☐ N/A☐
10. PLANS FOR IMPLEMENTATION AND MAINTENANCE OF TRADITIONAL MEASURES APPROPRIATE. only for some areas S☐ M☐ U☒ N/A☐

ANNUAL SITE COMPLIANCE EVALUATION REPORTS

MEETS PERMIT REQUIREMENTS. S☐ M☐ U☒ N/A☐ (*FURTHER EXPLANATION ATTACHED* yes)
DETAILS: not done within the past 2 years

1. SUMMARY OF THE SCOPE OF THE INSPECTION. S☐ M☐ U☒ N/A☐
2. PERSONNEL MAKING THE INSPECTION. S☐ M☐ U☒ N/A☐
3. MAJOR OBSERVATIONS. S☐ M☐ U☒ N/A☐
4. ACTIONS TAKEN TO REVISE THE POLLUTION PREVENTION PLAN. S☐ M☐ U☒ N/A☐
5. CERTIFICATION OF COMPLIANCE OR A LIST OF INCIDENTS OF NON-COMPLIANCE. S☐ M☐ U☒ N/A☐

COMPLIANCE WITH MUNICIPAL STORM WATER MANAGEMENT REQUIREMENTS

MEETS PERMIT REQUIREMENTS. S☐ M☐ U☐ N/A☒ (*FURTHER EXPLANATION ATTACHED* No)
DETAILS:

CONSISTENCY OF POLLUTION PREVENTION PLAN WITH OTHER PLANS

MEETS PERMIT REQUIREMENTS. S☒ M☐ U☐ N/A☐ (*FURTHER EXPLANATION ATTACHED* no)
DETAILS: SPCC personnel need updating

SALT STORAGE PILES ONSITE COVERED OR ENCLOSED

MEETS PERMIT REQUIREMENTS. S☐ M☐ U☐ N/A☒ (*FURTHER EXPLANATION ATTACHED* no)
DETAILS:

NPDES Compliance Inspection
Giant Refinery-Ciniza, NMR00A172

Further Explanations

Introduction

On February 26, 1997, a Compliance Evaluation Inspection was conducted at the Giant Refinery (Standard Industrial Classification 2911) located near Gallup, New Mexico by Richard E. Powell of the State of New Mexico Environment Department (NMED). The purpose of this inspection was to evaluate the permittee's compliance with the NPDES baseline general storm water permit for industrial activities and storm water regulations at **40 Code of Federal Regulations Part 122.26.**

Giant Refinery was granted permit coverage under the NPDES baseline general storm water permit and is assigned permit #NMR00A172. Storm water runoff from this site discharges to an unclassified tributary to the South Fork Puerco River; thence to the Puerco River (west). This report is based on review of files maintained by the permittee, on-site observation by NMED personnel, and verbal information provided by the permittee's representatives, Mr. David Pavlich, Manager-Health, Safety and Environment and Ms. Dorinda Mancini, Environmental Manager.

An entrance interview was conducted with Mr. Pavlich and Ms. Mancini, at approximately 0755 hours on February 26, 1997. The inspector made introductions, presented his credentials and discussed the purpose of the inspection.

Storm Water Pollution Prevention Plan (SWPPP)

Pollution Prevention Team: Overall rating of "Marginal"

Part IV.D.1. of the permit states, in part, "Each plan shall identify a specific individual or individuals within the facility organization as members of a storm water Pollution Prevention Team."

The SWPPP has not been updated since its initial preparation (plan dated 3-30-93) to incorporate numerous personnel changes which have occurred since that time.

Description of Potential Pollutant Sources: Overall rating of "Unsatisfactory"

Part IV.D.2 of the permit states, in part, "Each plan shall provide a description of potential sources which may reasonably be expected to add significant amounts of pollutants to storm water discharges or which may result in the discharge of pollutants during any dry weather from separate storm sewers draining the facility. Each plan shall identify all activities and significant materials which may potentially be significant pollutant sources."

The permittee has prepared a site map as required by the general permit but has not indicated drainage areas, particularly those which drain to the process water circuit; structural controls such as process/storm water controls, some secondary containment, curbing, etc.; and locations of all industrial activities and materials exposed to precipitation such as a scrap storage area north, and a large area northeast of the plant office. Many industrial activities, while indicated on the map are not labeled as such. In addition, the permittee has not done sampling since 1992, described all areas with a high potential for soil erosion, and has not summarized potential pollutant sources in all areas such as within the two areas mentioned above.

There is no indication in the SWPPP that these two areas were examined for potential pollutant sources either during the initial preparation of the SWPPP or since, during the facility's periodic/compliance inspections. Storm water runoff from these areas is allowed to discharge offsite, uncontrolled, which may result in the discharge of significant amounts of pollutants in storm water discharges from these areas.

Description of Appropriate Measures and Controls: Overall rating of "Unsatisfactory"

Part IV.D.3 of the permit states, In part, "Each facility covered by this permit shall develop a description of storm water management controls appropriate for the facility, and implement such controls. The appropriateness and priorities of controls in a plan shall reflect identified potential sources of pollutants at the facility."

Measures and controls to be described and implemented by the permittee include such things as good housekeeping, preventive maintenance, periodic inspections, employee training, record keeping, non-storm water evaluations and certifications, sediment and erosion control, as well as implementation/maintenance of traditional storm water management practices, where appropriate.

Although the SWPPP states what good housekeeping should involve, the plan does not include an implementation schedule or any records that good housekeeping practices are being conducted.

The SWPPP also states, under the preventive maintenance section, that the permittee will "Develop a suitable records system for scheduling tests and documenting inspections in the preventive maintenance program." The SWPPP does establish schedules for periodic inspections of pipes, pumps, storage tanks and bins, pressure vessels, valves, process and material handling equipment, storm water management devices, drums, tanks, containment structures, etc. to be conducted by plant personnel at specific intervals and within specific time frames, and provides for "prompt repair". However, there are no records included, or referenced in the plan, that these inspections have or are being conducted and that required repairs/maintenance activities have been completed.

Although not addressed in the SWPPP, according to the permittee's representative, employee training is conducted at a frequency of 2/year in conjunction with semi-annual safety training, but this training is not recorded in the SWPPP.

Part IV.D.3.f of the baseline general permit requires that "Inspection and maintenance activities shall be documented and records of such activities shall be incorporated into the plan."

Some of the above perceived problems may be due to the fact that inspection, maintenance, good housekeeping, and other required records (if available at all) are not incorporated into the SWPPP, but are rather scattered throughout several locations, without any clear indication in the SWPPP of where pertinent records may found. At a minimum, the SWPPP should document procedures which the permittee follows when conducting inspections, good housekeeping, maintenance and training, and reference where records of these activities can be found. Overall, there does not seem to be a mechanism within the framework of the SWPPP for setting objectives and tracking performance, preparing status reports, amending procedures as needed, etc., and coordinating these efforts through the Pollution Prevention Team.

Part IV.D.3.g.(1) of the baseline general permit requires that "[t]he plan shall include a certification that the discharge has been tested or evaluated for the presence of non-storm water discharges.", signed by a responsible corporate officer or by his(her) duly authorized representative. The SWPPP does not include a signed certification that the permittee has tested or evaluated the storm water discharges at this site for the presence of non-storm water discharges.

Finally, during the initial site assessment at this facility, the permittee identified a number of areas having a reasonable potential to generate significant amounts of pollutants in storm water discharges from this site. The SWPPP includes a description of storm water management controls to be implemented by the permittee in these areas, along with a schedule for their implementation. According to the permittee's representative, the proposed controls were implemented according to schedule in many areas. However, during the site tour, the inspector observed that storm water management controls in several areas identified by the permittee as having a "high" potential for contributing pollutants to storm water discharges, have not been implemented or are insufficient, as follows:

1. Truck Rack Area - curbing sufficient to contain the worst case spill from this area was to have been installed by 1-31-94. Curbing and berms have been installed but, on the date of this inspection, the inspector observed an oily residue in a ditch adjacent to this area. This ditch drains to an employee parking lot and the permittee's representative was unsure of the source of this residue, or whether runoff carried by the ditch is captured or treated before leaving the

plant site;

2. Truck Parking Area - curbing to contain spills and leaks from equipment utilizing this area was to have been constructed along the downslope borders by 2-28-94. Curbing has not been installed along at least part of the area. Since there are significant oil & grease accumulations on the surface of the sections of this parking area from which runoff does not appear to be controlled, the potential for contaminated runoff to discharge offsite from these areas remains high; and

3. Rail Car Loading Area - a spill containment berm between this area and the adjacent main diversion ditch was to have been constructed by 2-28-94. This berm has not yet been constructed. Given the close proximity of this main offsite water diversion ditch, and the nature and volume of the materials handled at this location, this appears to be quite a serious oversight on the part of the permittee.

Annual Site Compliance Evaluation Reports: Overall rating of "Unsatisfactory"

Part IV.D.4 of the permit states, in part, "Qualified personnel shall conduct site compliance evaluations at appropriate intervals specified in the plan, but, except as provided in paragraph IV.D.4.d (below), in no case less than once a year."

According to the permittee's representative, annual site compliance evaluations have not been conducted at this facility for the past two years.

Per Part IV.D.4 of the permit, the required annual site compliance evaluation should involve pollution prevention team members in a **comprehensive** evaluation of the SWPPP and the entire plant site, including effectiveness of current measures and controls, and identification of current and anticipated potential pollutant sources. This evaluation should include an inspection of all equipment, such as spill response equipment, needed to implement the plan, and should ascertain that all required inspections, maintenance, and good housekeeping activities are conducted and recorded, and that these activities are effective in controlling pollutant loads in storm water runoff. Based on the results of this evaluation, appropriate revisions to the SWPPP, and implementation of any required changes/additions should be made in a timely manner. Finally, a report summarizing all aspects of the evaluation including major observations, required revisions, and schedules must be prepared, and signed by (in this case) the plant manager.

An exit interview to discuss the findings of this inspection was conducted at approximately 1445 hours on February 26, 1997 with Mr. Pavlich, at the plant office.

GIANT
REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505.
722.3833

July 2, 1997

Mr. Richard E. Powell
Surface Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
Santa Fe, NM 87502

Re: SWPPP Compliance Evaluation Inspection - February 26, 1997
Giant Refining Company, Ciniza Refinery - NPDES Permit No. NMR00A172

Dear Mr. Powell:

I would like to thank you for forwarding to Giant a copy of your report on the above-referenced inspection visit. I appreciate the time you took to go over Ciniza's Storm Water Pollution Prevention Plan in detail and provide suggestions on how we can improve our Plan and best address some of the shortcomings which we uncovered during your visit.

This letter is intended to provide you with a follow-up response to the items noted in your report and advise you of how those items are being addressed. In order to avoid overlooking any of those items, the attached response summary addresses each inspection item marked as "Marginal" or "Unsatisfactory" in the inspection report on an item-by-item, section-by-section basis.

Again, thank you for your assistance in reviewing our facility's Plan.

Sincerely,

David C. Pavlich

David C. Pavlich
Manager - Health, Safety & Environment
Giant Refining Company

Enc.

cc: Dick Platt, Giant, Ciniza Refinery
Dorinda Mancini, Giant, Ciniza Refinery
Steve Morris, Giant, Ciniza Refinery
Joe Winkler, NMED, Gallup Field Office
Roger Anderson, NMOCD
Taylor Sharpe, USEPA (6EN-WT)

SWPPP Inspection Report Response

POLLUTION PREVENTION TEAM

Meets Permit Requirements (Marginal) "Not updated since 3-30-93 - numerous personnel changes"

The Plan has been updated to reflect current personnel assignments.

DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

Meets Permit Requirements (Unsatisfactory)

1. *Site Map*
    a) *Drainage areas*
    c) *Structural and non-structural controls*
    e) *Significant materials exposed to precipitation*
    f) *Location of leaks/spills which have occurred in the last 3 yrs. "1 occurrence"*
    g) *Location of industrial activities exposed to precipitation*
        Fueling stations. "Not marked"
        Maintenance or cleaning areas. "not marked"
        Loading/unloading areas. "1 marked, 1 not marked"
        Waste treatment storage or disposal areas. "Water treatment not marked"
        Liquid storage tanks. "Not marked but on SPCC list"
        Processing areas. "Not all"
        Storage areas. "Not marked/not all"

The maps associated with the Plan are being updated to more clearly identify the above items. The revised maps will indicate in more detail specific drainage areas, locations of controls, areas of industrial activities, etc.

2. *List of pollutants likely to be present in discharges (Unsatisfactory) "Not in some areas."*

In addition to clearly identifying specific potential discharge areas in the Plan and associated maps, potential pollutants from areas not specifically listed in the prior Plan (e.g., the used equipment storage yard) will be listed in the updated Plan.

4. *Summary of existing storm water sampling data (Marginal) "None done since 1992."*

After several years of extremely dry conditions which limited the potential for sampling of stormwater runoff, this year's unseasonably wet Spring conditions provided sufficient runoff to allow facility personnel the opportunity to sample runoff leaving the site.

5. *Description of areas with a high potential for significant soil erosion (Marginal)*

Description / delineation of these areas will be improved in the updated Plan. In addition, further mitigation measures are being taken in these areas to minimize the potential for erosion in those areas.

6. *A narrative summarizing potential pollutant sources (Unsatisfactory) "Sources in* some areas not identified."

Sources presenting a potential for pollution (e.g., the used equipment storage yard) will be more fully discussed in the updated Plan.

DESCRIPTION OF APPROPRIATE MEASURES AND CONTROLS

Meets Permit Requirements (Unsatisfactory)

1. *Meets good housekeeping procedures (Marginal)*

The description of the facility's housekeeping procedures has been revised in the updated Plan.

2. *Preventive maintenance procedures (Marginal) "Need to reference where records are kept."*

Because of the voluminous nature of these records, they are kept in the responsible departments' (e.g., Inspection and Maintenance) files. The location of these quite records has been more specifically referenced in the updated Plan.

4. *Inspection procedures (Marginal) "Not recorded."*

As mentioned in Item 2. above, these quite substantial files are kept in their respective departments. The SWPP Plan has been updated to reflect the location of these documents.

5. *Employee training program (Marginal) "Done 2/yr. in safety training - not in SWPPP"*

The semi-annual "safety" training at this facility includes not only safety and fire-fighting training but also presentations and training by the facility's Health, Safety & Environmental personnel in environmental matters. This environmental training includes the explanation and discussion of the facility's obligations and procedures regarding the proper handling of chemicals and hazardous wastes, minimization of air pollution, spill response and containment, leak detection and prevention, and prevention of soil, groundwater, and surface water contamination. Storm water pollution prevention obligations and practices are standard discussion items during these training sessions.

The above-mentioned environmental training material has historically been and remains an integral part of this periodic refresher training. It is also a standard part all employees' initial orientation and training when beginning employment at this facility.

6. *Recordkeeping and internal reporting procedures (Unsatisfactory)*

Documentation of SWPPP inspections and actions taken as a consequence to inspections will be improved. Other daily / weekly / periodic inspections of the facility's process area, wastewater treatment areas, hazardous waste handling areas, storage areas, etc. and the associated documentation of these inspections was judged to be in order and will be continued.

7. Non-storm water discharge certification (Unsatisfactory) "Not done, not signed by Manager."

This certification will be prepared and signed following the satisfactory completion of all items identified during the facility area inspections being conducted this Spring and Summer.

a) *Identify authorized non-storm water discharges and appropriate controls*

This further identification of discharges and the specification and implementation of appropriate controls is in progress. All identified control measures are anticipated to be in place by mid-summer.

8. *Erosion and sediment controls for areas with high erosion potential (Marginal)*

Areas identified during the SWPPP inspection as well as other areas with elevated erosion potential identified subsequent to the inspection are being addressed. Appropriate control / mitigation measures are anticipated to be in place by mid- to late-summer at all identified locations.

9. *A narrative consideration of traditional storm water management practices (Marginal) "For some areas."*

Discussions of these practices in the Plan are being enhanced and expanded to cover other areas as needed.

10. *Plans for implementation and maintenance of traditional measures appropriate (Unsatisfactory) "Only for some areas."*

The Plan's documentation of the implementation of these measures will be improved.

The inspection report identifies three areas of particular concern where storm water management controls were inadequate or not properly implemented. These specific areas are discussed below.

1. The Truck Rack Area - Though the curbing and berms called for in the original Plan have been installed, a ditch adjacent to this area still drains to a truck parking lot. This ditch is currently being evaluated for two possible resolution options: a) redirection of flow to the facility's process sewer system or b) installation of drainage controls which will capture any hydrocarbon liquids or sheens which may occur in any runoff from this ditch.

2. The Truck Parking Area - Though some limited curbing has been installed around this parking area and erosion controls (rip-rap) have been installed at the drainage points with the highest erosion potential, the possibility remains for some uncontrolled runoff from this area. In reassessing the originally proposed control techniques, facility Pollution Prevention Team members have identified more viable control techniques that include additional erosion control measures and the installation of new runoff control structures. These structures will be capable of containing on site the entire volume of a maximum credible hydrocarbon release from a truck parked in the area as well as any hydrocarbon sheens from parking lot storm water runoff contamination.

3. The Rail Car Loading Area - The spill containment berm originally proposed and begun for this area has now been refurbished / completed. The bermed area will prevent stormwater runoff from the rail car loading area from entering the water diversion ditch running along the eastern boundary of the site. The area is now capable of containing a volume of spilled material approximately equal to the entire capacity of a typical rail car.

ANNUAL SITE COMPLIANCE EVALUATION REPORT

Meets Permit Requirements (Unsatisfactory) "Not done within the past two years."

The facility's Pollution Prevention Team will conduct the annual site compliance evaluation inspections as required and will properly document all findings, observations, actions, and Plan revisions necessary to maintain facility compliance. Facility compliance certifications will be completed and filed following these inspections.