

NM2 - 10

INSPECTIONS & DATA



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

May 26, 2000

CERTIFIED MAIL

RETURN RECEIPT NO. Z-559-573-319

Mr. Timothy Kinney
Giant Industries Arizona, Inc.
111 County Road 4990
Bloomfield, NM 87413

**RE: Centralized Surface Waste Management Facilities Inspection Report
Giant Industries Arizona, Inc.
OCD Rule 711 Permit Approval NM-02-0010
NW/4 SE/4 of Section 16, Township 25 North, Range 12 West, NMPM,
San Juan County, New Mexico.**

Dear Mr. Kinney:

The New Mexico Oil Conservation Division (OCD) inspected the Giant Industries Arizona, Inc. (Giant) surface waste management facility at the above location on May 17, 2000.

Overall the OCD found Giant to have a well maintained landfarm with good security. The OCD inspection and file review of Giant indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Giant during the inspection and file review. Attachment 2 contains photographs taken during the inspection. Giant shall provide OCD with a detailed description of how the corrections will be made and a time table of when each of the corrections will be completed. Giant must respond to the permit deficiencies by June 26, 2000.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martyne J. Kielling
Environmental Geologist

Attachments

xc: Aztec OCD Office
Barry Holeman

ATTACHMENT 1
INSPECTION REPORT
GIANT INDUSTRIES ARIZONA, INC.
NW/4 SE/4 of Section 16, Township 25 North, Range 12 West, NMPM,
San Juan County, New Mexico
(May 26, 2000)

1. Fencing and Signs: The facility will be fenced and have a sign at the entrance. The sign shall be maintained in good condition and shall be legible from at least fifty (50) feet and contain the following information : a) name of facility, b) location by section, township and range, and c) emergency phone number.

Landfarm is secured with a fence and locking gate and has a sign at the entrance.

2. Berming: An adequate berm will be constructed and maintained to prevent runoff and runon for that portion of the facility containing contaminated soils.

Cell berms are in good shape and well maintained (see photo 2).

3. Setbacks: All new landfarm facilities or modifications to existing landfarm facilities must have a setbacks along the facility boundary and along any pipelines crossing the landfarm. Contaminated soils will not be placed within twenty (20) feet of any pipelines crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines..

The facility setbacks are maintained. There are no pipelines crossing the landfarm.

4. Soil Spreading, Disking and Lift Thickness: All contaminated soils received at the facility will be spread and disked within 72 hours of receipt. Soils will be spread on the surface in six inch lifts or less. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

At the time of inspection, soils in each cell had been spread and disked accordingly (see photos 1 and 2).

5. Free Liquids: No free liquids or soils with free liquids will be accepted at the facility.

No free liquids were observed within the landfarm.

6. Trash and Potentially Hazardous Materials: All trash and potentially hazardous materials should be properly disposed of.

Landfarm contained some plastic and wire.

7. 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 facilities or modifications to existing facilities must place the tank on an impermeable pad within the berm so that leaks can be identified.

N/A There are no above ground tanks located at the landfarm.

8. Sumps and Valve Catchments: All sumps and catchments must be kept empty so that leaks can be identified and to prevent overflow onto the ground.

N/A There are no sumps or valve catchments located at landfarm.

9. Concrete Mixing Impoundment: Adequate freeboard must be maintained to prevent any overtopping or slop over of material. Material received at the impoundment must be mixed and stabilized immediately.

N/A There are no impoundment located at landfarm.

10. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should 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 should also be stored on an impermeable pad and curb type containment.

N/A There are no drums located at landfarm.

All drums and chemical containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill or ignite.

11. 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.

N/A There are no saddle tanks located at landfarm.

12. Tank Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill or ignite.

N/A

13. Migratory Bird Protection: All tanks exceeding 16 feet in diameter and exposed pits, ponds or lagoons must be screened, netted, covered or otherwise rendered not hazardous to migratory birds.

N/A

14. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 to the appropriate OCD District Office.

At the time of inspection, there were no spills evident at landfarm.

15. Regular Facility Inspections: Cells must be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants. Facility inspections and maintenance must be conducted on at least a biweekly basis and immediately following each consequential rainstorm or windstorm.

Disking records show that land farm is disked on average once every three weeks instead of the required two week interval. Facility inspection records have been maintained at the same frequency as disking.

16. H₂S Screening: H₂S screening must be recorded and maintained.

N/A

17. Waste Acceptance and Disposal Documentation: The records for each load must include: 1) generator; 2) origin; 3) date received; 4) quantity; 5) certification; 6) NORM status declaration; 7) transporter; 8) exact cell location; and 9) any addition of microbes moisture, fertilizers, *etc.*

Disposal records are maintained as required.

ATTACHMENT 2:

Page 1

Giant Industries Arizona, Inc.
Permit NM-02-0010



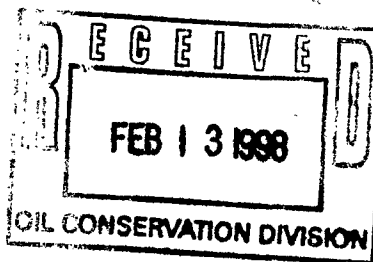
Photo 1 05-17-00
Looking Southeast at landfarm.



Photo 1 05-17-00
Looking East at landfarm.



Industrial Services Group
Central Region



February 11, 1998

Project 16958

Martyne J. Kieling, Environmental Geologist
New Mexico Energy, Minerals and Natural Resources Dept.
Oil Conservation Division - Environmental Bureau
2040 S. Pacheco Street
Santa Fe, NM 87505

RE: Giant Industries Arizona, Inc. Landfarm Application Review NW/4, SE/4 of Section 16, Township 25 North, Range 12 West, NMPM, San Juan County, New Mexico

Dear Ms. Kieling:

Philip Services Corporation (Philip) has received your letter dated January 23, 1997 requesting additional information prior to further review of the Giant Industries Arizona, Inc. (Giant) Landfarm application.

Please amend the following sections of Giant's Application form C-137 dated November 3, 1997 to include the following:

SECTION 6

Giant owns all of Section 16, Township 25 North, Range 12 West, NMPM. The proposed landfarm facility will not be constructed within one hundred (100) feet of adjacent landowners' property. A twenty-five (25) foot buffer zone will be maintained inside the fenced area, and no contaminated soil will be placed within twenty five (25) feet of the boundary of the facility. No contaminated soil will be placed within one hundred (100) feet of adjacent landowners' property.

SECTION 8

Within twenty-four (24) hours from discovery, Giant will notify the OCD of any break, spill, blow out, or fire or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

SECTION 9

Routine inspection and maintenance will be conducted on a monthly basis following consequential rainstorms or windstorms as long as on-site soils have:

Combining the Strengths of Philip Services Corp., Allwaste and Serv-Tech



- total petroleum hydrocarbons (TPH) concentrations above 100 parts per million (ppm);
- sum concentrations of all aromatic hydrocarbons (BTEX) greater than 50 ppm;
- benzene concentrations greater than 10 ppm.

The following procedures shall be used to monitor a treatment zone not to exceed three (3) feet beneath the landfarm:

- Approved EPA methods will be used to take one (1) background soil sample from the center portion of the landfarm two (2) feet below the native ground surface prior to operation. The sample will be analyzed for TPH, major cations/anions, volatile aromatic organics (BTEX), and heavy metals.
- A treatment zone not to exceed three (3) feet beneath the landfarm will be monitored. A minimum of one (1) random soil sample will be taken from each cell, with no cell being larger than five (5) acres, six (6) months after the first contaminated soils are received in the cell and then quarterly thereafter. The sample will be taken at two to three (2-3) feet below the native ground surface.
- Approved EPA methods will be used to analyze the soil samples quarterly for TPH and BTEX, and annually for major cations/anions and heavy metals.
- After the soil samples are obtained, the boreholes will be filled with bentonite.
- Analytical results from the treatment zone monitoring will be submitted to the OCD Santa Fe office for annual review.

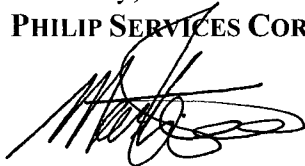
SECTION 10

Giant will perform quarterly treatment zone monitoring until a laboratory measurement of TPH in the last lift of treated soil is less than 100 ppm, the sum concentration of BTEX is less than 50 ppm, and the concentration of benzene is less than 10 ppm.

Please call me at (505) 326-2262 if you have any questions or need additional information.

Sincerely,

PHILIP SERVICES CORPORATION



Martin Nee
Operations Manager

cc: OCD Aztec Office
Mr. Timothy Kinney, Giant

GIANT MID-CONTINENT, INC.
NW/4 SE/4 SEC. 16,
T-25-N, R-12-W, NMPM
SAN JUAN CO., NEW MEXICO
IN CASE OF EMERGENCY
CALL COLLECT
(505) 632-8006

Giant Land Farm

1998

GIANT MID-CONTINENT, INC.

**NW/4 SE/4 SEC. 16,
T-25-N, R-12-W, NMPM
SAN JUAN CO., NEW MEXICO
IN CASE OF EMERGENCY
CALL COLLECT
(505) 632-8006**

Giant Land Farm

1998



Giant Land Farm

1998

NW, SE, Sec 16, T25-N, R12W



Giant Land Farm

1998

NW SE, Sec 16, T2S N, R12W



Giant Land Ferry

1998

NW, SE, Sec 16, T25N, R12, W



Giant Land Farm

1998

NW, SE, Sec 16, T25N, R12W