

AP-111

**SWMU No. 10
Sludge Pits**

**Investigation Work
Plan**

September 2014

Chavez, Carl J, EMNRD

From: Johnson, Cheryl <Cheryl.Johnson@wnr.com>
Sent: Monday, January 04, 2016 9:52 AM
To: VanHorn, Kristen, NMENV; Chavez, Carl J, EMNRD
Cc: Riege, Ed; Scott Crouch
Subject: FW: Notice - SWMU 10 Corrective Action Work Plan - additional soil borings (5) - DRAFT...
Attachments: SWMU 10 Soil Boring Coordinates - Phase 2.xlsx; SWMU 10 Proposed Soil Boring Locations 18 thru 22.jpg

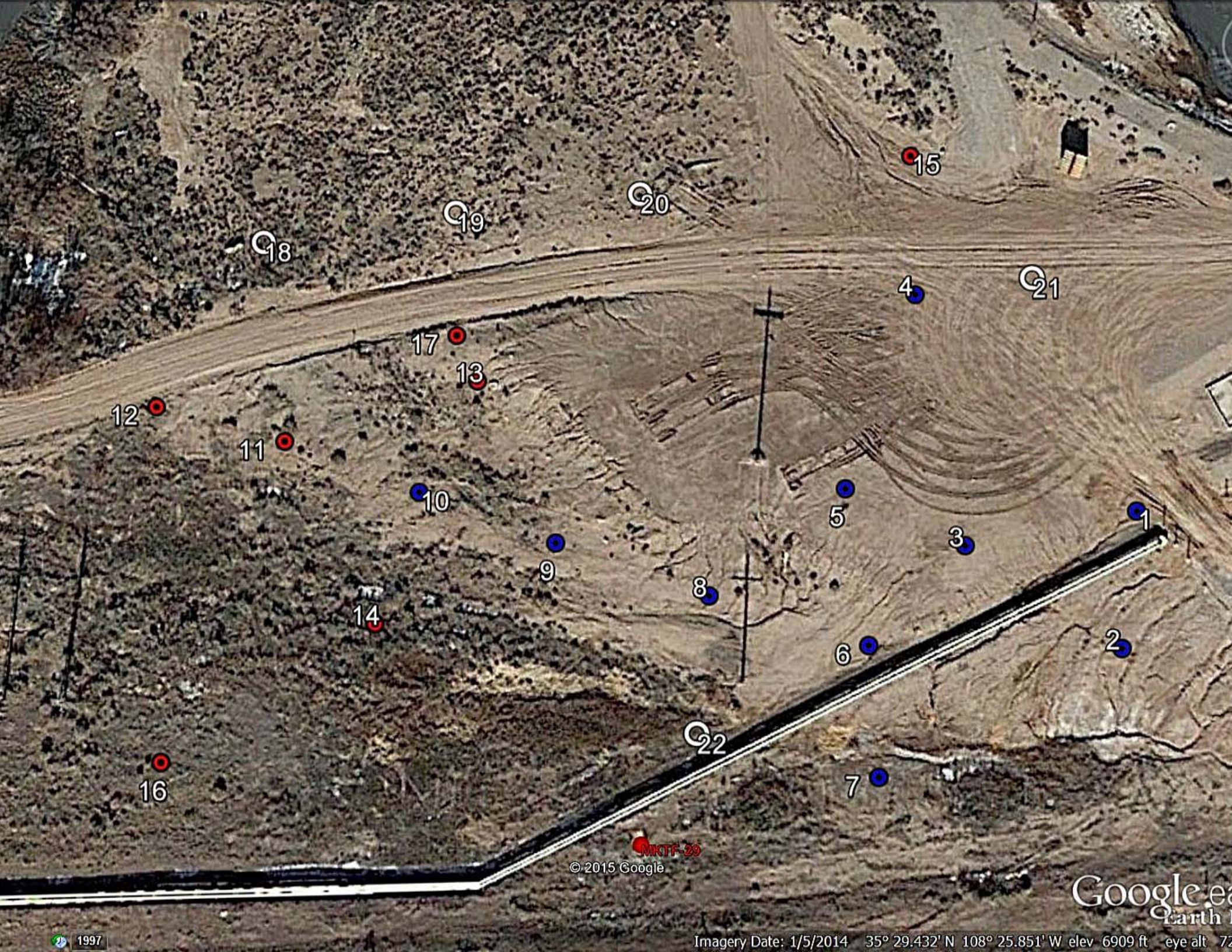
Kristen, Carl;

Under the SWMU 10 Corrective Action Work Plan, Section 4.1, Western plans an additional five soil borings to complete the lateral delineation of impacted soil at SWMU 10. The planned work is scheduled to commence the week of January 25, 2016. Attached are the proposed soil boring coordinates as provided by Google Earth and a map of the proposed locations.

If you have any questions, please call or e-mail.

Cheryl Johnson
Environmental Specialist

Western Refining - Gallup Refinery
92 Giant Crossing Road
Gallup, NM 87301
505 722 0231 Direct
505 863-0930 Fax
505 722 3833 Main
cheryl.johnson@wnr.com



MKTF-29
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Google Earth

WESTERN REFINERY SW, INC.
GALLUP, NEW MEXICO
COORDINATES FOR SWMU 10 SOIL BORINGS

Boring No.	Coordinates	
SWMU 10-18	N 35°29.445'	W 108°25.875'
SWMU 10-19	N 35°29.446'	W 108°25.861'
SWMU 10-20	N 35°29.447'	W 108°25.849'
SWMU 10-21	N 35°29.442'	W 108°25.823'
SWMU 10-22	N 35°29.418'	W 108°25.846'

* All borings will be advanced to a minimum of 20 feet below the ground surface.

Chavez, Carl J, EMNRD

From: Johnson, Cheryl <Cheryl.Johnson@wnr.com>
Sent: Monday, January 04, 2016 12:11 PM
To: VanHorn, Kristen, NMENV; Chavez, Carl J, EMNRD
Cc: Riege, Ed; Scott Crouch; Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV
Subject: RE: Notice - SWMU 10 Corrective Action Work Plan - additional soil borings (5)
Attachments: WestRef-dB66 1_2_4-Trimethylbenzene Soil Concen SWMU No 10.pdf; WestRef-dB67 Benzene Soil Concen SWMU No 10.pdf; WestRef-dB68 Ethylbenzene Soil Concen SWMU No 10.pdf; WestRef-dB69 Naphthalene Soil Concen SWMU No 10.pdf; WestRef-dB70 1-Methylnaphthalene Soil Concen SWMU No 10.pdf; WestRef-dB71 2-Methylnaphthalene Soil Concen SWMU No 10.pdf; WestRef-dB72 Xylenes Soil Concen SWMU No 10.pdf; WestRef-dB73 DRO Soil Concen SWMU No 10.pdf; WestRef-dB74 MORO Soil Concen SWMU No 10.pdf

Kristen,
Per your request attached are maps of analytical results to date.

cj

Cheryl Johnson
Environmental Specialist
Ext. 3231

"It's easier to take a small action now instead of a big action "some day."

From: VanHorn, Kristen, NMENV [mailto:Kristen.VanHorn@state.nm.us]
Sent: Monday, January 04, 2016 11:05 AM
To: Johnson, Cheryl; Chavez, Carl J, EMNRD
Cc: Riege, Ed; Scott Crouch; Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV
Subject: RE: Notice - SWMU 10 Corrective Action Work Plan - additional soil borings (5) - DRAFT...

Hi Cheryl,
Thanks for sending the proposed boring locations. We need some more information to justify the location of the proposed soil borings before we can say whether or not they are adequate. Since we don't have the results of the investigation to date - What are the analytical results for the soil borings that were already installed?

Feel free to call to discuss.

Thanks,
Kristen

From: Johnson, Cheryl [mailto:Cheryl.Johnson@wnr.com]
Sent: Monday, January 04, 2016 9:52 AM
To: VanHorn, Kristen, NMENV; Chavez, Carl J, EMNRD
Cc: Riege, Ed; Scott Crouch
Subject: FW: Notice - SWMU 10 Corrective Action Work Plan - additional soil borings (5) - DRAFT...

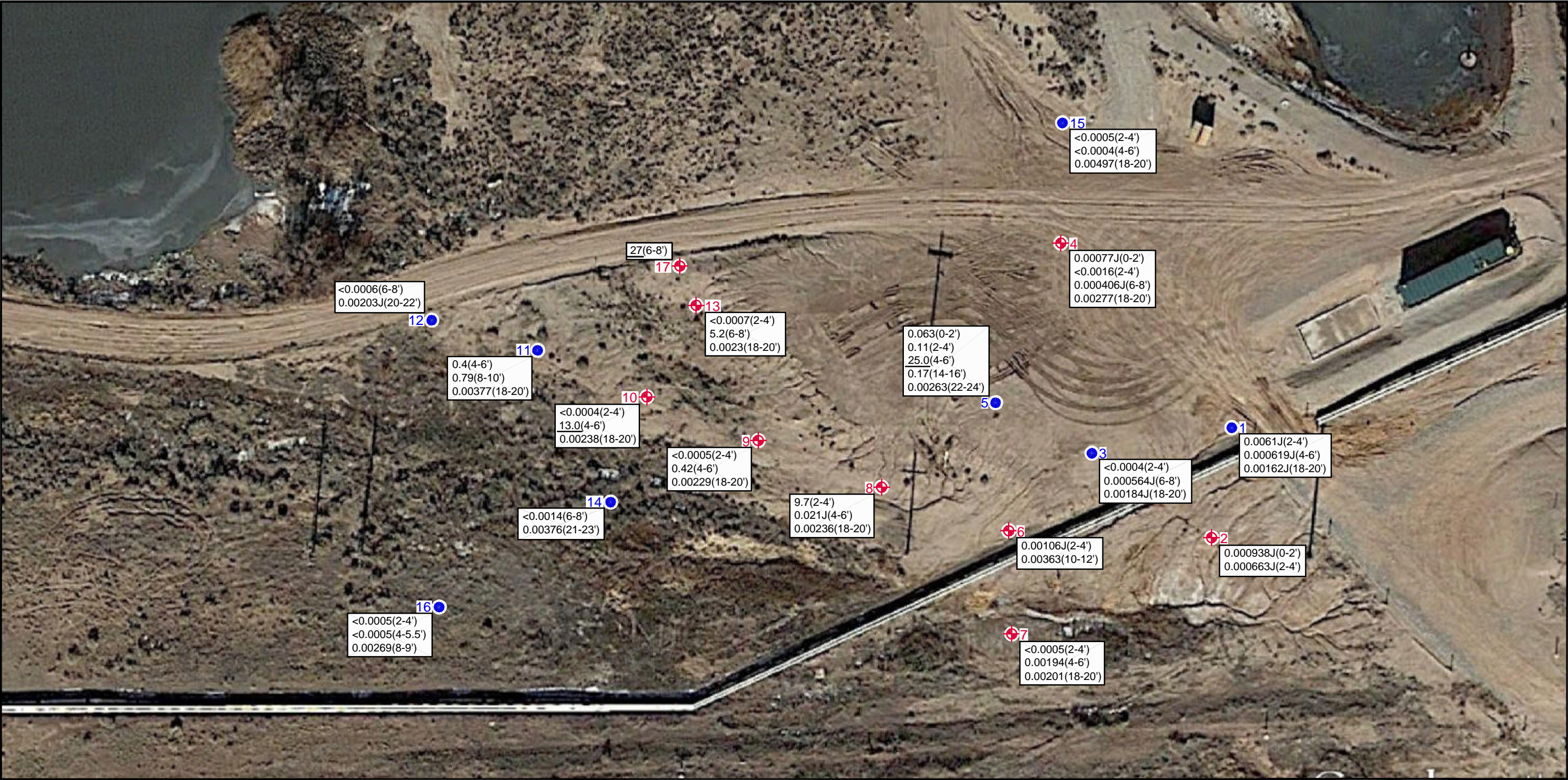
Kristen, Carl;

Under the SWMU 10 Corrective Action Work Plan, Section 4.1, Western plans an additional five soil borings to complete the lateral delineation of impacted soil at SWMU 10. The planned work is scheduled to commence the week of January 25, 2016. Attached are the proposed soil boring coordinates as provided by Google Earth and a map of the proposed locations.

If you have any questions, please call or e-mail.

Cheryl Johnson
Environmental Specialist

Western Refining - Gallup Refinery
92 Giant Crossing Road
Gallup, NM 87301
505 722 0231 Direct
505 863-0930 Fax
505 722 3833 Main
cheryl.johnson@wnr.com



Aerial Map Source: Google Map, 01/05/2014.

0 40
SCALE IN FEET

LEGEND

2 SOIL BORING LOCATION AND IDENTIFICATION NUMBER

1 SOIL BORING / TEMPORARY WELL LOCATION AND IDENTIFICATION NUMBER

0.063(0-2') 1,2,4- TRIMETHYLBENZENE CONCENTRATION, mg/kg (SAMPLE DEPTH-FT)

25.0 UNDERLINED CONCENTRATION VALUE EXCEEDS SCREENING LEVEL

NEW MEXICO

GALLUP SITE LOCATION

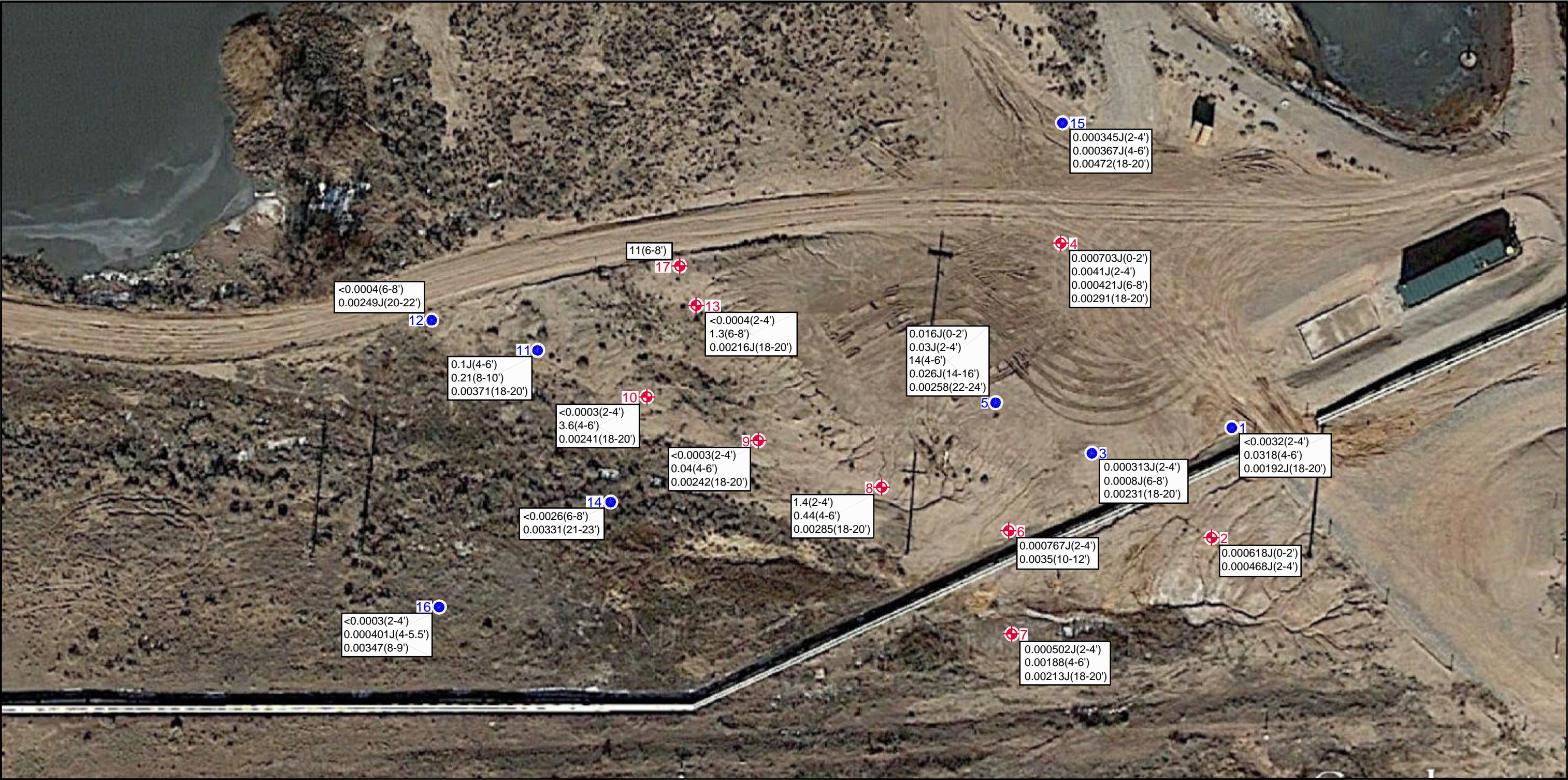
Western Refining
GALLUP REFINERY

PROJ. NO.: Western Refining | DATE: 12/19/15 | FILE: WestRef-dB66

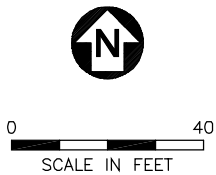
1,2,4- TRIMETHYLBENZENE
SOIL CONCENTRATIONS
SWMU No. 10

DiSorbo
Environmental Consulting Firm

8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



Aerial Map Source: Google Map, 01/05/2014.



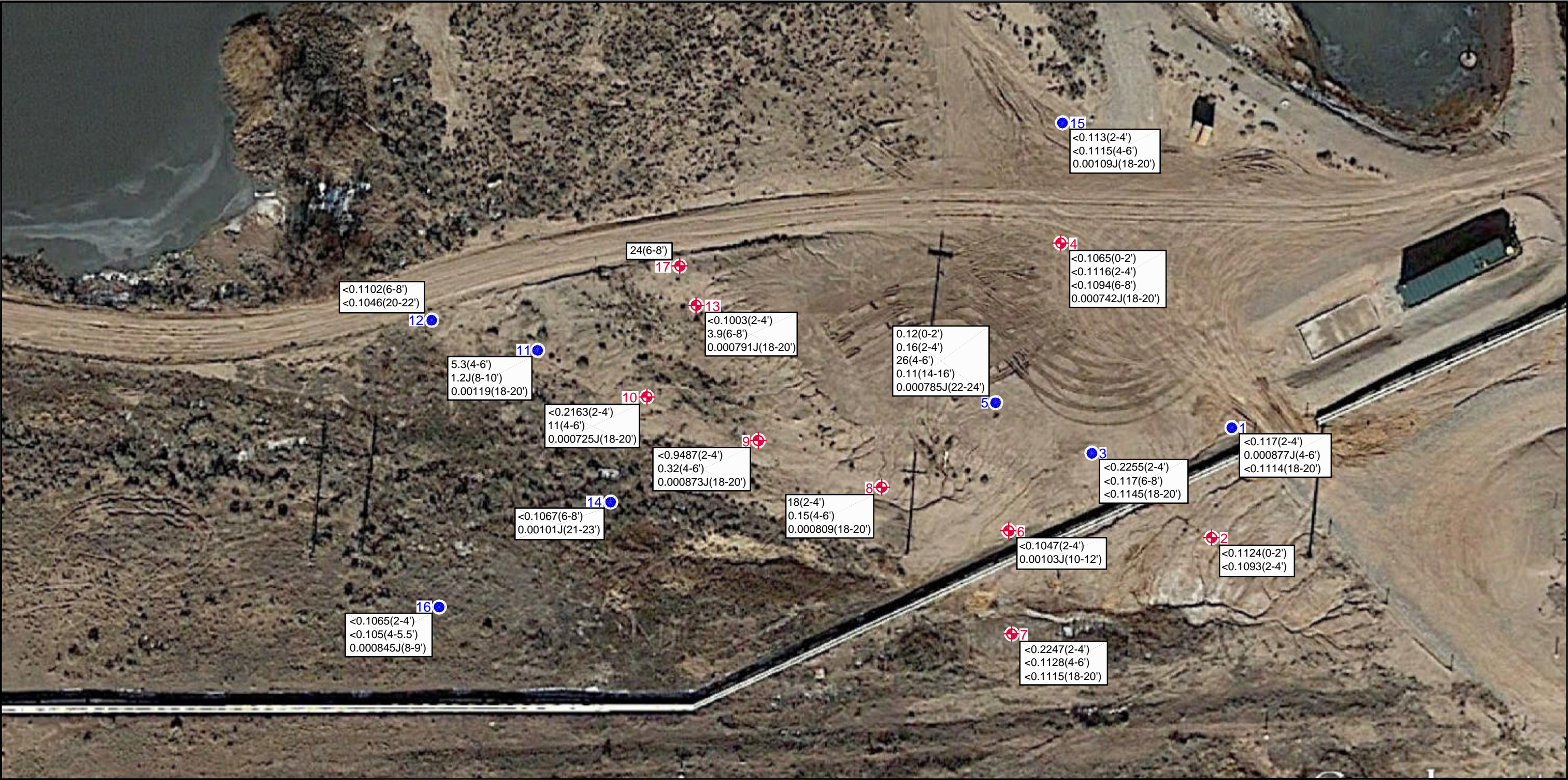
- LEGEND**
- 2 SOIL BORING LOCATION AND IDENTIFICATION NUMBER
 - 1 SOIL BORING / TEMPORARY WELL LOCATION AND IDENTIFICATION NUMBER
 - 1.4(2-4') ETHYLBENZENE CONCENTRATION, mg/kg (SAMPLE DEPTH-FT)





PROJ. NO.: Western Refining | DATE: 12/19/15 | FILE: WestRef-dB68

ETHYLBENZENE
SOIL CONCENTRATIONS
SWMU No. 10

DiSorbo
Environmental Consulting Firm
8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759





Aerial Map Source: Google Map, 01/05/2014.


SCALE IN FEET

LEGEND

2  SOIL BORING LOCATION AND IDENTIFICATION NUMBER


1  SOIL BORING / TEMPORARY WELL LOCATION AND IDENTIFICATION NUMBER

0.12(0-2') NAPHTHALENE CONCENTRATION, mg/kg (SAMPLE DEPTH-FT)



NEW MEXICO


GALLUP SITE LOCATION



Western Refining
GALLUP REFINERY

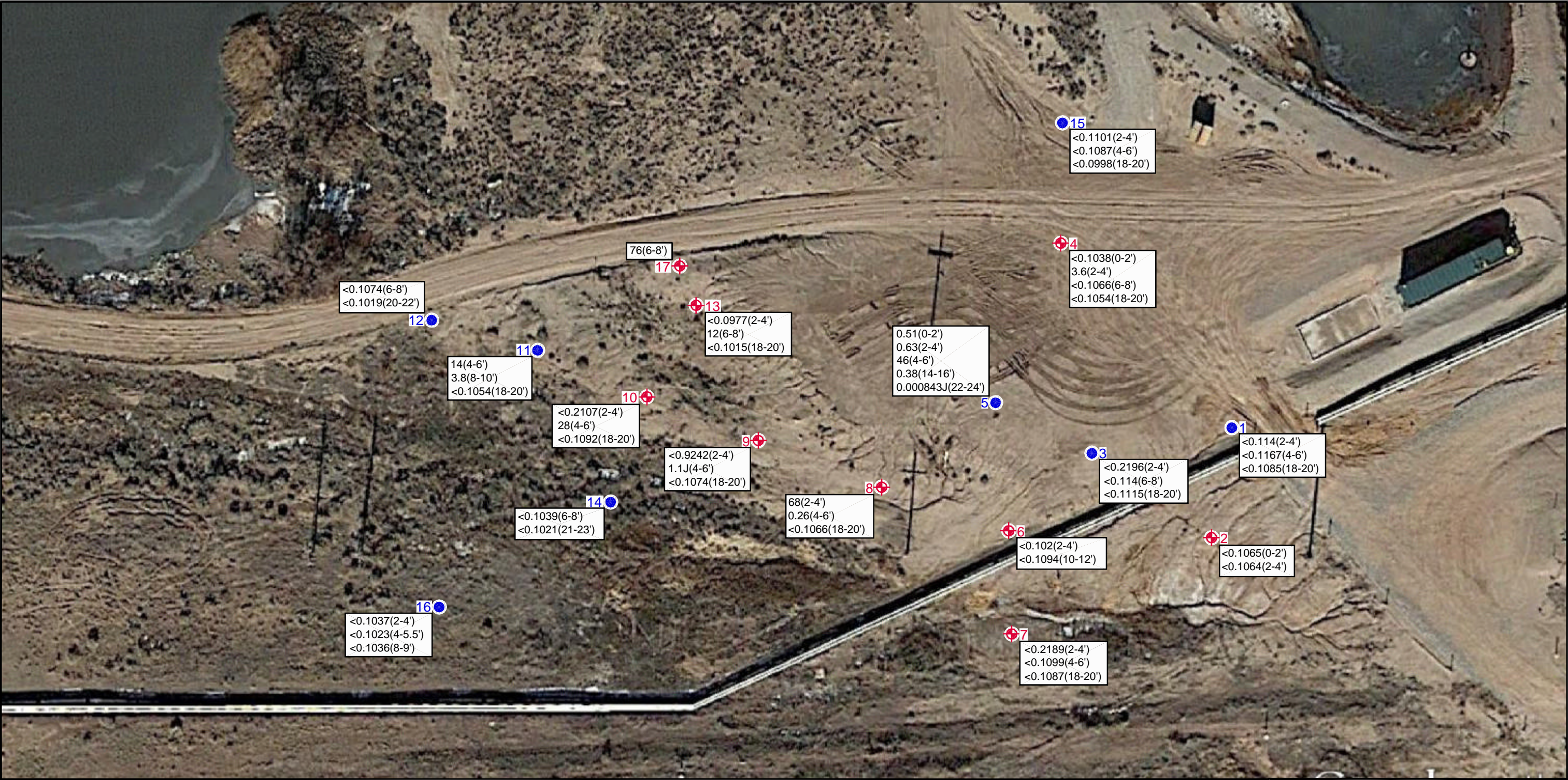
PROJ. NO.: Western Refining | DATE: 12/19/15 | FILE: WestRef-dB69

NAPHTHALENE
SOIL CONCENTRATIONS
SWMU No. 10

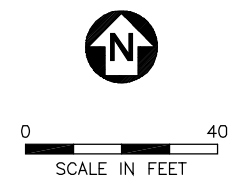


DiSorbo
Environmental Consulting Firm

8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



Aerial Map Source: Google Map, 01/05/2014.



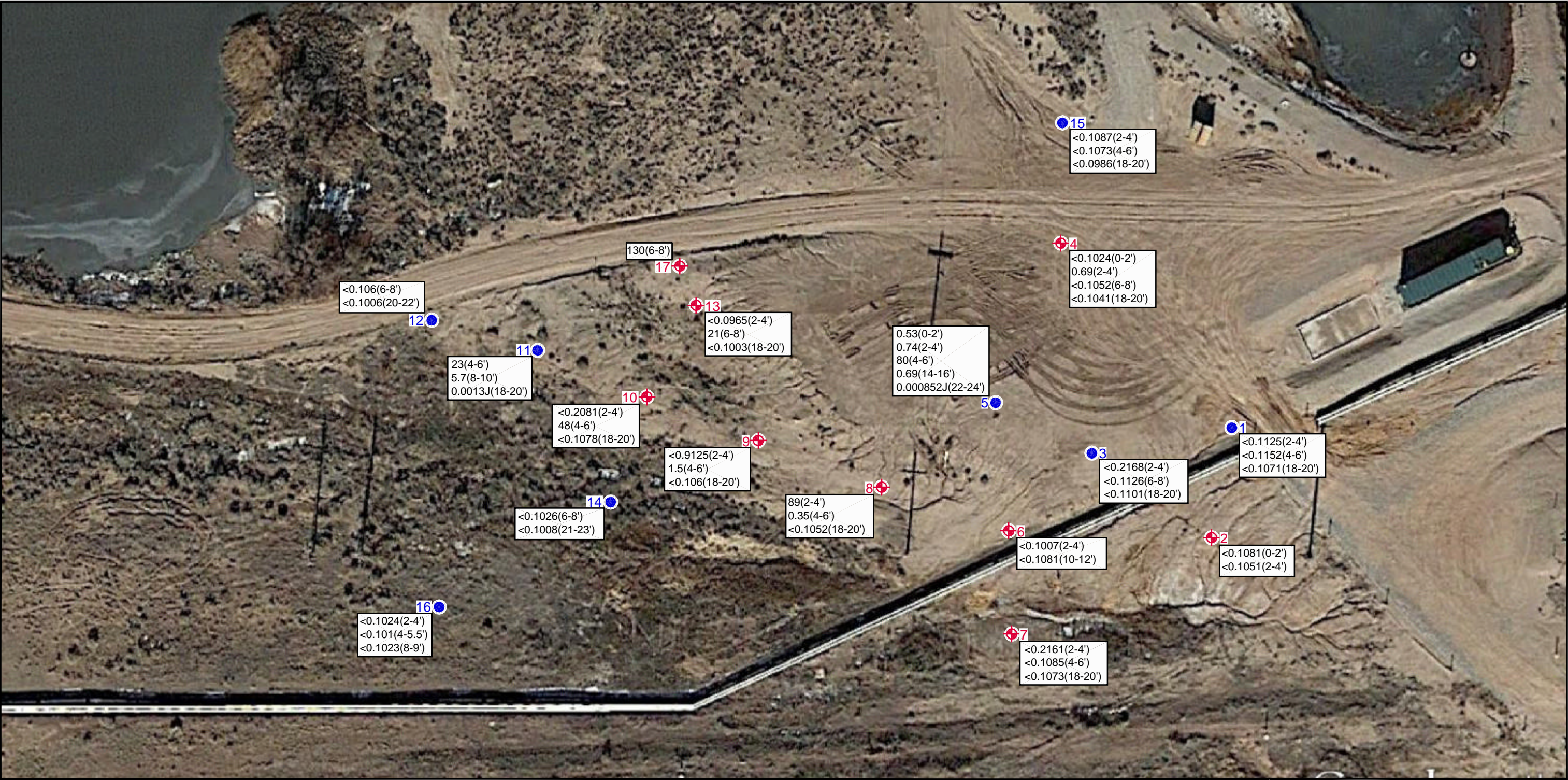
- LEGEND**
- 2 SOIL BORING LOCATION AND IDENTIFICATION NUMBER
 - 1 SOIL BORING / TEMPORARY WELL LOCATION AND IDENTIFICATION NUMBER
 - 0.51(0-2') 1-METHYLNAPHTHALENE CONCENTRATION, mg/kg (SAMPLE DEPTH-FT)



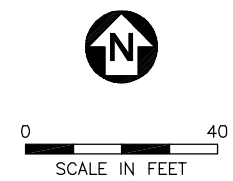
PROJ. NO.: Western Refining | DATE: 12/19/15 | FILE: WestRef-dB70

1-METHYLNAPHTHALENE
SOIL CONCENTRATIONS
SWMU No. 10

DiSorbo
Environmental Consulting Firm
8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



Aerial Map Source: Google Map, 01/05/2014.



- LEGEND**
- 2 SOIL BORING LOCATION AND IDENTIFICATION NUMBER
 - 1 SOIL BORING / TEMPORARY WELL LOCATION AND IDENTIFICATION NUMBER
 - 0.53(0-2') 2-METHYLNAPHTHALENE CONCENTRATION, mg/kg (SAMPLE DEPTH-FT)



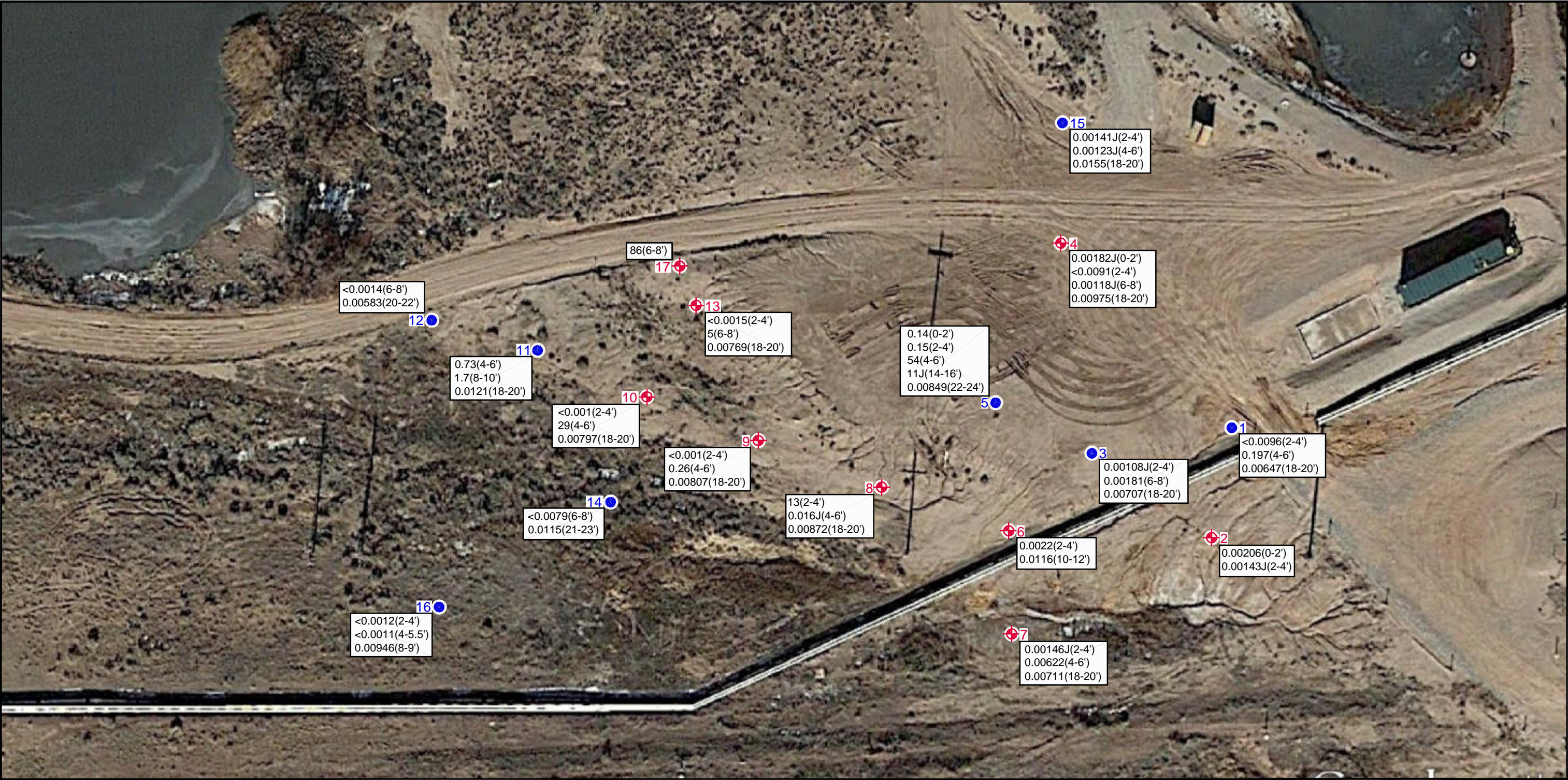
GALLUP SITE LOCATION





PROJ. NO.: Western Refining | DATE: 12/27/15 | FILE: WestRef--dB71

2-METHYLNAPHTHALENE
SOIL CONCENTRATIONS
SWMU No. 10


DiSorbo
Environmental Consulting Firm
8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759




Aerial Map Source: Google Map, 01/05/2014.




SCALE IN FEET


LEGEND

2  SOIL BORING LOCATION AND IDENTIFICATION NUMBER

1  SOIL BORING / TEMPORARY WELL LOCATION AND IDENTIFICATION NUMBER


0.14(0-2') XYLENES CONCENTRATION, mg/kg (SAMPLE DEPTH-FT)

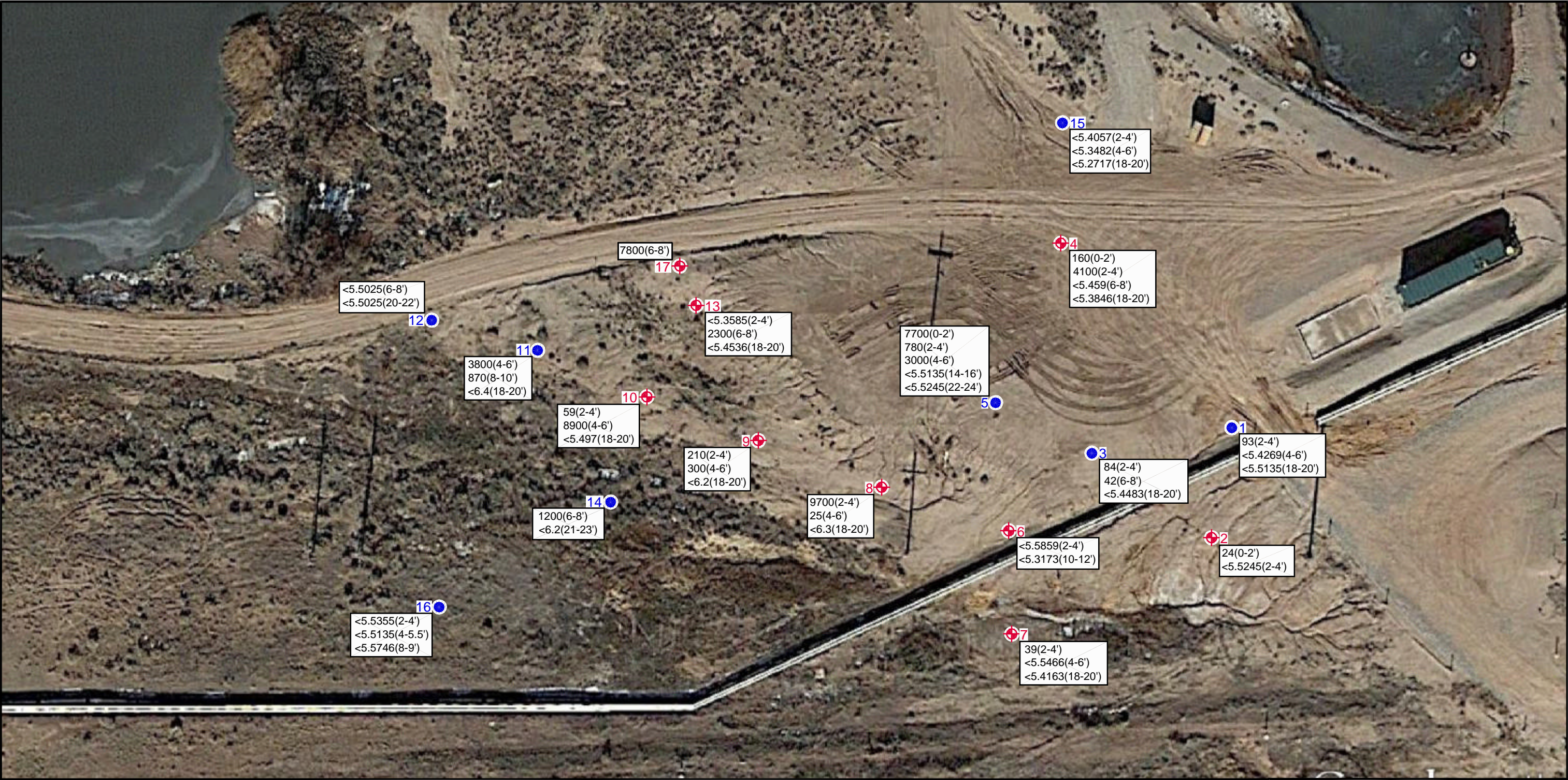

NEW MEXICO
GALLUP SITE LOCATION


GALLUP REFINERY

PROJ. NO.: Western Refining | DATE: 12/27/15 | FILE: WestRef-dB72

XYLENES
SOIL CONCENTRATIONS
SWMU No. 10

 8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



Aerial Map Source: Google Map, 01/05/2014.

0 40
SCALE IN FEET

LEGEND

2 SOIL BORING LOCATION AND IDENTIFICATION NUMBER

1 SOIL BORING / TEMPORARY WELL LOCATION AND IDENTIFICATION NUMBER

160(0-2') DIESEL RANGE ORGANICS CONCENTRATION, mg/kg (SAMPLE DEPTH-FT)

NEW MEXICO

GALLUP SITE LOCATION

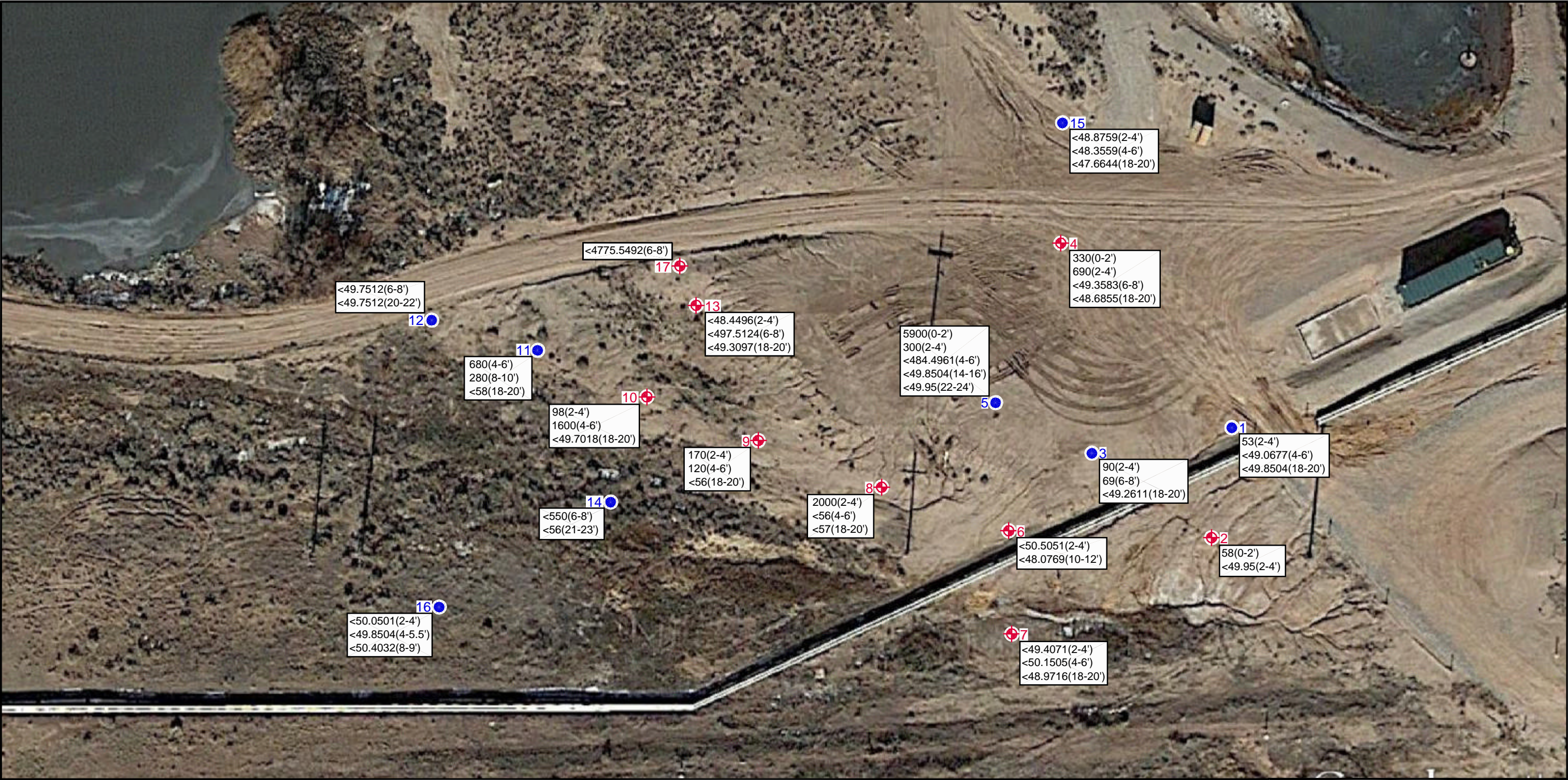
Western Refining
GALLUP REFINERY

PROJ. NO.: Western Refining | DATE: 12/27/15 | FILE: WestRef-dB73

**DIESEL RANGE ORGANICS
SOIL CONCENTRATIONS
SWMU No. 10**

DiSorbo
Environmental Consulting Firm

8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



Aerial Map Source: Google Map, 01/05/2014.

0 40
SCALE IN FEET

LEGEND

2

SOIL BORING LOCATION AND IDENTIFICATION NUMBER

1

SOIL BORING / TEMPORARY WELL LOCATION AND IDENTIFICATION NUMBER

330(0-2')

MOTOR OIL RANGE ORGANICS CONCENTRATION, mg/kg (SAMPLE DEPTH-FT)

NEW MEXICO
GALLUP SITE LOCATION

GALLUP REFINERY

PROJ. NO.: Western Refining | DATE: 12/27/15 | FILE: WestRef-dB74

MOTOR OIL RANGE ORGANICS
SOIL CONCENTRATIONS
SWMU No. 10

Environmental Consulting Firm

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Suite 300
Austin, Texas 78759



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

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RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 2, 2015

Mr. Ed Riege
Environmental Manager
Western Refining, Southwest Inc., Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

**RE: APPROVAL WITH MODIFICATIONS
INVESTIGATION WORK PLAN SWMU NO. 10 SLUDGE PITS
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-14-007**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) has reviewed the *Investigation Work Plan Solid Waste Management Unit (SWMU) No. 10 Sludge Pits* (Work Plan), dated September 16, 2014, submitted on behalf of Western Refining Southwest Inc., Gallup Refinery (Permittee) and hereby issues this Approval with the following modifications.

Comment 1

Figure 7 (Proposed Sample Locations) depicts the proposed locations for borings, but none of the locations are labeled. In the Investigation Report provide a figure where the borings are identified. Additionally, re-locating several of the proposed locations may provide better coverage to compare to prior sampling analytical results exceeded the soil screening levels; however, it is difficult to determine historic sampling locations in comparison to the proposed locations using the figures provided in the Work Plan. Submittal of revised figures are not required, because the Permittee's sampling plan, discussed in Section 4.1 (Investigation), allows

Mr. Riege
Gallup Refinery
March 2, 2015
Page 2

for additional investigation to be conducted, if field results reveal that the lateral and vertical extent of contamination has not been determined.

Comment 2

In the Background Section of the Investigation Report required by this Approval with Modifications, discuss the amount of sludge removed from the pits and where the sludge was disposed, if known. Discuss whether or not the overflow pipe from the pit was removed or not. Provide a figure depicting the pipe and outfall locations.

Comment 3

Section 3.2 (Subsurface Conditions) provides a general discussion of the soil types and associated hydraulic conductivity at the SWMU. In the Investigation Report provide a more specific discussion regarding groundwater conditions beneath the SWMU. An existing monitoring well is depicted on Figure 7 (Proposed Sample Locations) and there are other groundwater monitoring wells in the vicinity; therefore, localized groundwater data are available for interpretation. Also, utilizing the boring logs from previous investigations and the current investigation, provide a more site specific discussion of the soils at the SWMU.

Comment 4

NMED's NFA Comments called attention to the fact that the sludge pits were used to dispose of RCRA listed wastes, K049 and K051, that generally contain hexavalent chromium and lead as constituents. The Permittee proposes to analyze for chromium (SW-846 method 6010/6020) and chromium VI (SW-846 method 3060A). In addition to a discussion of the analytical results for chromium VI, include a discussion in the Investigation Report regarding the historical use of chromium VI at the refinery.

Comment 5

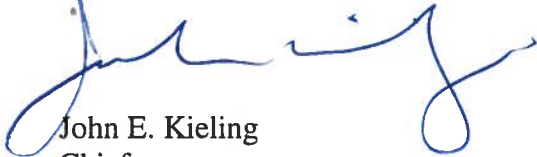
In the Executive Summary and Section 2.1 (Sludge Pits (SWMU No. 10) page 2-2, the Permittee states, "Giant Refining Company proposed in-place bioremediation of soils in 1993, which was approved by the United States Environmental Protection Agency (EPA) in January 1994, with modifications." There is no record of in-place bioremediation occurring at the SWMU. According to historic documents sludge was removed from the pits using a vacuum truck with some sludge remaining at the bottom of the pits. Then "dry" soil was placed in the pit as backfill. In the Investigation Report include a statement that bioremediation was recommended, but there was no follow through. Include a discussion of the source of the backfill soil and whether or not the soil was characterized prior to use as backfill.

The Permittee must address all relevant comments in this Approval with Modifications in the Investigation Report. The Investigation Report must be submitted on or before **March 8, 2016**.

Mr. Riege
Gallup Refinery
March 2, 2015
Page 3

If you have questions regarding this Approval with Modifications, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
K. Van Horn, NMED HWB
C. Chavez, EMNRD OCD
A. Hains, WRG
L. King, EPA

File: Reading File and WRG 2015 File
WRG-14-007

INVESTIGATION WORK PLAN

SWMU No. 10 Sludge Pits

Gallup Refinery
Western Refining Southwest, Inc.
Gallup, New Mexico
EPA ID# NMD000333211

September 2014

Mr. Billy McClain
Refinery Manager
Western Refining Southwest, Inc.
Gallup Refinery



(512) 693-4190

8501 N. MoPac, Suite 300

Austin, TX 78759

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Appendix D Investigation Derived Waste Management Plan

List of Acronyms

areas of concern (AOCs)

below ground surface (bgs)

Code of Federal Regulations (CFR)

Contract Laboratory Program (CLP)

Data quality objective (DQO)

Environmental Protection Agency (EPA)

Hazardous and Solid Waste Act (HSWA)

Investigation derived waste (IDW)

mean sea level (msl)

New Mexico Administrative Code (NMAC)

New Mexico Environment Department (NMED)

photoionization detector (PID)

quality assurance/quality control (QA/QC)

Resource Conservation and Recovery Act (RCRA)

RCRA Facility Investigation (RFI)

semi-volatile organic compound (SVOC)

Solid Waste Management Units (SWMUs)

volatile organic constituent (VOC)

Executive Summary

The Gallup Refinery, which is located 17 miles east of Gallup, New Mexico, has been in operation since the 1950s. Past inspections by State [New Mexico Environment Department (NMED)] and federal environmental inspectors have identified locations where releases to the environment may have occurred. These locations are generally referred to as Solid Waste Management Units (SWMUs). Pursuant to the terms and conditions of the facility Resource Conservation and Recovery Act (RCRA) Post-Closure Care Permit and 20.4.1.500 New Mexico Administrative Code, this Investigation Work Plan has been prepared for the former Sludge Pits. Attachment G of the facility's Post-Closure Care Permit provides a list of designated SWMUs and Areas of Concern (AOCs), and the Sludge Pits are listed as SWMU No. 10.

The two former API Separator sludge pits were located approximately 200 feet southwest of the Old API Separator. The two pits covered an area of approximately 130 feet by 80 feet and 70 feet by 50 feet with a depth of 2 feet. The pits were used to contain oily waste removed from the API Separator. In 1980 the sludge was removed from the pits, which were then backfilled and covered with clean soil. A RCRA Facility Assessment was conducted at the site in 1987 and the location of the former pits was identified as SWMU No. 10. Subsequently, soil sampling was conducted in 1990 and 1994. The results of these sampling events detected the presence of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and metals. Giant Refining Company proposed in-place bioremediation of soils in 1993, which was approved by the United States Environmental Protection Agency (EPA) in January 1994, with modifications.

This Investigation Work Plan proposes to collect samples of soil and groundwater, if encountered, to determine the current concentrations of constituents in the area of the former sludge pits. Ten soil borings/temporary wells will be completed throughout the area of the former sludge pits and the samples will be analyzed for Skinner List metals, VOCs, and SVOCs, and total petroleum hydrocarbons.

Section 1

Introduction

The Gallup Refinery is located approximately 17 miles east of Gallup, New Mexico along the north side of Interstate Highway I-40 in McKinley County. The physical address is I-40, Exit #39 Jamestown, New Mexico 87347. The Gallup Refinery property covers approximately 810 acres. Figure 1 presents the refinery location and the regional vicinity, which is characterized as high desert plain comprised primarily of public lands used for grazing by cattle and sheep.

The Gallup Refinery is a crude oil refinery currently owned and operated by Western Refining Southwest, Inc. ("Western"), formerly known as Giant Industries Arizona, Inc. and formerly doing business as Giant Refining Company Ciniza Refinery, an Arizona corporation. The Gallup Refinery generally processes crude oil from the Four Corners area transported to the facility by pipeline or tanker truck.

Various process units are operated at the facility, including crude distillation, reforming, fluidized catalytic cracking, alkylation, isomerization, sulfur recovery, mercox treater, and hydrotreating. Current and past operations have produced gasoline, diesel fuels, jet fuels, kerosene, propane, butane, and residual fuel.

On October 31, 2013, the NMED issued a RCRA Post-Closure Care Permit ("Permit") to Western. The Permit authorizes post-closure care at a hazardous waste land treatment unit and also includes corrective action provisions. Section IV.H.5.a.i requires the Permittee to prepare and submit RCRA Facility Investigation Work Plans to the NMED in accordance with the schedule set forth in Permit Attachment E. The investigation work plan for SWMU No. 10 (Sludge Pits) is due September 20, 2014.

The location of SWMU No. 10 is shown on Figure 2. Photographs of the SWMU and the surrounding area are included in Appendix A.

The purpose of the site investigation is to determine and evaluate the presence, nature, and extent of releases of contaminants in accordance with 20.4.1.500 New Mexico Administrative Code (NMAC) incorporating 40 Code of Federal Regulations (CFR) Section 264.101.

Section 2

Background

This section presents background information for SWMU No. 10 including a review of historical waste management activities to identify the following:

- Type and characteristics of all waste and all contaminants handled in the SWMU;
- Known and possible sources of contamination;
- History of releases; and
- Known extent of contamination.

2.1 Sludge Pits (SWMU No. 10)

The Sludge Pits were originally included as a SWMU in the 1988 Hazardous and Solid Waste Act (HSWA) permit and subsequently included for investigation in the 1990 RCRA Facility Investigation (RFI) Work Plan. The Sludge Pits were put into service in 1958 and was removed from service in 1980, when the sludge was removed and the pit area was covered with a layer of soil. There were two pits that covered an area of approximately 130 feet by 80 feet and 70 feet by 50 feet with a depth of 2 feet (Figure 2). The pits were used to contain oily waste removed from the API Separator.

In 1990, during the Phase I RFI eight soil borings (RFI1001V through RFI1008V) were completed to depths of 13 feet below ground surface (bgs) (Figure 3) (Giant Refining Company, 1991). Soil samples were collected from depths of 0.0 feet bgs, 3.0 feet bgs, 6.0 feet bgs, 9.0 feet bgs, and 12.5 feet bgs. The soil samples were analyzed for metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, nickel, mercury, potassium, selenium, vanadium, and zinc), VOCs, and SVOCs and the results are presented in Table 1. For comparison the NMED soil screening levels (*Risk Assessment Guidance for Site Investigation and Remediation*, dated February 2012) and EPA Regional Screening Levels are also included in Tables 1 and 2. Based on the detection of constituents in the samples collected in 1990, EPA directed that deeper samples be collected from the same area. As shown on Figure 4, eight additional soil borings (RFI1014V through RFI1021V) were drilled to depths of 25 feet bgs using hollow-stem augers with soil samples collected at depths of 19.0 feet bgs and 25.0 feet bgs (Giant Refining Company, 1994). The soil samples were analyzed for VOCs, SVOCs, and metals and the results are summarized in Table 2.

The analytical results for the soil samples collected in 1990 indicated the presence of arsenic, barium, cadmium, chromium (compared to chromium VI screening levels), cobalt, copper, mercury, benzene, ethylbenzene, toluene, xylenes, 2,4-dimethylphenol, 2-methylnaphthalene, o-cresol, m&p-cresol, fluorene, naphthalene, and phenol at concentrations above screening levels. The metals were initially compared to background concentrations in the 1991 RFI report; however, NMED has not approved background concentrations for metals and thus it is not currently known how the reported metals concentrations compare to naturally occurring concentrations. The metals were found at concentrations above screening levels in all samples, in particular for chromium when compared to chromium VI screening levels and cobalt. The soil samples collected in 1990 were not analyzed to determine the valence state of the chromium, but rather it was reported as total chromium. The organic constituents with concentrations above the screening levels were detected in samples collected at boring locations RFI1002 at a depth of 3 feet bgs, RFI1004 from depths of 3 feet bgs to 9 feet bgs, and RFI1005 from depths of 6 feet bgs to 12.5 feet bgs.

The analytical results for the soil samples collected in 1994 indicated the presence of barium and di-n-butyl phthalate at concentrations above their respective screening levels. Barium was detected in all but one soil sample (RFI1015V25.0) above the screening level of 300 mg/kg. Di-n-butyl phthalate was detected at concentrations above the screening level (7.0 mg/kg) in four soil samples (RFI1018V19.0, RFI1019V25.0, RFI1021V19.0, and RFI1021V25.0). Di-n-butyl phthalate is a phthalate ester (plasticizer) and is considered by EPA to be a common laboratory contaminant (EPA, 1989).

Giant proposed to implement the corrective action plan (in-place bioremediation) that had previously been submitted to EPA in February 1993 and approved, with modifications, by EPA on January 7, 1994. During the week of March 23, 1998, an on-site inspection was conducted by Practical Environmental Services, Inc. in support of preparation of a RCRA Post-Closure Care Permit for the Gallup Refinery Land Treatment Unit. The Summary Report is included as Appendix B and the observations were as follows:

- The sludge pits area was observed vacant and inactive. No sign of soil staining or residual waste was evident at or in the vicinity of the site;
- Native shrubs and grasses were observed growing throughout the general vicinity. No signs of distress were evident; and
- Local soil in the vicinity of the sludge pits is bentonitic clays and silts. Similar soil strata from a neighboring SWMU exhibited a hydraulic conductivity of less than 10^{-7} cm/sec.

Section 3

Site Conditions

The conditions at the site, including surface and subsurface conditions that could affect the fate and transport of any contaminants, are discussed below. This information is based on recent visual observations and historical subsurface investigations.

3.1 Surface Conditions

Local site topographic features include high ground in the southeast gradually decreasing to lowland fluvial plain in the northwest. Elevations on the refinery property range from 7,040 feet to 6,860 feet. The area of the site near SWMU No. 10 is at an approximate elevation of 6,910 feet above mean sea level (msl). The pictures in Appendix A show the land surface in the immediate area.

The McKinley County soil survey identifies the soil in the area of SWMU No. 10 as the Simitarq-Celavar sandy loams (USDA, 2005). The Simitarq-Celavar soils are well drained with a conservative permeability of 0.20 in/hr and minimal salinity. Simitarq soils have nearly neutral pH values ranging from 7.2 to 7.4 standard units.

Regional surface water features include the refinery evaporation ponds and aeration lagoons and a number of small ponds. The site is located in the Rio Puerco valley, north of the Zuni Uplift with overland flows directed northward to the tributaries of the Rio Puerco. The Rio Puerco continues to the east to the confluence with the Rio Grande. The South Fork of the Puerco River is intermittent and retains flow only during and immediately following precipitation events.

3.2 Subsurface Conditions

The shallow subsurface soils consist of fluvial and alluvial deposits comprised of clay and silt with minor inter-bedded sand layers. Very low permeability bedrock (e.g., claystones and siltstones) underlie the surface soils and effectively form an aquitard. The Chinle Formation, which is Upper Triassic, crops out over a large area on the southern margin of the San Juan Basin. The uppermost recognized local member is the Petrified Forest and the Sonsela Sandstone Bed is the uppermost recognized regional aquifer. Aquifer test of the Sonsela Bed northeast of Prewitt indicated a transmissivity of greater than 100 ft²/day (Stone and others, 1983). The Sonsela Sandstone's highest point occurs southeast of the site and slopes downward to the northwest as it passes under the refinery. The Sonsela Sandstone forms a water-bearing reservoir with artesian conditions

throughout the central and western portions of the refinery property. Groundwater within the Sonsela Sandstone flows downdip to the northwest.

The diverse properties and complex, irregular stratigraphy of the surface soils across the site cause a wide range of hydraulic conductivity ranging from less than 10^{-2} cm/sec for gravely sands immediately overlying the Chinle Formation to 10^{-8} cm/sec in the clay soils located near the surface (Western Refining, 2009). Generally, shallow groundwater at the refinery follows the upper contact of the Chinle Formation with prevailing flow from the southeast to the northwest, with some flow to the northeast on the northeastern portion of the refinery property. Figure 5 presents a cross section location map showing cross section (A-A'), which is included as Figure 6.

Section 4

Scope of Activities

The site investigation of soils and groundwater will be conducted to define the nature and extent of impacts to the environment and facilitate remedy selection, as necessary. The investigation will commence upon approval of this investigation work plan by NMED.

4.1 Investigation

A focused investigation of soils throughout the location of the former sludge pits will be conducted to characterize current concentrations of constituents associated with refinery operations (e.g., former storage of API Separator sludge) and define the extent of any such impacts. Ten soil borings will be located in the area of the former sludge pits. These locations have been selected to help ensure samples are collected from within the former sludge pits and also near the perimeter of the pit area.

All soil borings will be drilled to a minimum depth of 20 feet or to the top of bedrock, whichever occurs first. If there is field evidence of impacts at greater depths, then soil borings will be drilled deeper to achieve full vertical delineation. A review of previous borings in the area drilled to 25 feet bgs (Appendix C) indicates the presence of a continuous hard shaley clay throughout the area that occurs at approximately 17 feet bgs. There were no observed impacts in this continuous clay unit.

The proposed locations for soil borings/temporary wells are shown on Figure 7. As necessary, additional investigation of soils and groundwater will be conducted to define the lateral extent of any identified releases. If there are indications of lateral migration of constituents away from the former location of the sludge pits within subsurface soils and/or groundwater, then additional borings/temporary monitoring wells will be completed within approximately 50 feet of the original boring location. Additional borings/temporary wells will continue to be added in a similar manner, as necessary, to define the lateral and vertical extent of impacts to soil and/or groundwater. Selection of additional sample locations will be coordinated with NMED.

4.1.1 Soil Sample Field Screening and Logging

All soil borings will be continuously logged and samples field screened. Samples obtained from the soil borings will be screened in the field on 2.0 foot intervals for evidence of contaminants. Field screening results will be recorded on the exploratory boring logs. Field screening results will be used to aid in the selection of soil samples for laboratory analysis. The primary screening methods

include: (1) visual examination, (2) olfactory examination, and (3) headspace vapor screening for volatile organic compounds. Additional screening for site- or release-specific characteristics such as pH or for specific compounds using field test kits may be conducted where appropriate.

Visual screening includes examination of soil samples for evidence of staining caused by petroleum-related compounds or other substances that may cause staining of natural soils such as elemental sulfur or cyanide compounds. Headspace vapor screening targets volatile organic compounds and involves placing a soil sample in a plastic sample bag or a foil sealed container allowing space for ambient air. The container will be sealed and then shaken gently to expose the soil to the air trapped in the container. The sealed container will be allowed to rest for a minimum of 5 minutes while vapors equilibrate. Vapors present within the sample bag's headspace will then be measured by inserting the probe of the instrument in a small opening in the bag or through the foil. The maximum value and the ambient air temperature will be recorded on the field boring or test pit log for each sample.

The monitoring instruments will be calibrated each day to the manufacturer's standard for instrument operation. A photo-ionization detector (PID) equipped with a 10.6 or higher electron volt (eV) lamp or a combustible gas indicator will be used for VOC field screening. Field screening results may be site- and boring-specific and the results may vary with instrument type, the media screened, weather conditions, moisture content, soil type, and type of contaminant, therefore, all conditions capable of influencing the results of field screening will be recorded on the field logs.

Discrete soil samples will be retained for laboratory analyses from within the following intervals:

- 0.0-0.5 feet (at soil borings with evidence of impacts near the land surface);
- 2.0-2.5 feet or the top of native soil if identifiable (at all soil borings);
- > 2.0 feet (from the interval in each soil boring with the greatest apparent degree of contamination, based on field observations and field screening);
- From the bottom of each borehole (all soil borings);
- From the 0.5 foot interval at the top of saturation (applicable only to borings that reach saturation); and
- Any additional intervals as determined based on field screening results.

The physical characteristics of the samples (such as mineralogy, ASTM soil classification, moisture content, texture, color, presence of stains or odors, and/or field screening results), depth where each

sample was obtained, method of sample collection, and other observations will be recorded in the field log by a qualified geologist or engineer. Detailed logs of each boring will be completed in the field by a qualified geologist. Additional information, such as the presence of water-bearing zones and any unusual or noticeable conditions encountered during drilling, will be recorded on the logs.

Quality Assurance/Quality Control (QA/QC) samples will be collected to monitor the validity of the soil sample collection procedures as follows:

- Field duplicates will be collected at a rate of 10 percent; and
- Equipment blanks will be collected from all sampling apparatus at a frequency of one per day.

4.1.2 Drilling Activities

Soil borings will be drilled using hollow-stem augers. The drilling equipment will be properly decontaminated before drilling each boring. The NMED will be notified as early as practicable if conditions arise or are encountered that do not allow the advancement of borings to the specified depths or at planned sampling locations. Appropriate actions (e.g., installation of protective surface casing or relocation of borings to a less threatening location) will be taken to minimize any negative impacts from investigative borings. If contamination is detected at the water table, then the boring will be drilled five feet below the water table or to refusal, whichever occurs first.

Known site features and/or site survey grid markers will be used as references to locate each boring. The boring locations will be measured to the nearest foot and locations will be recorded on a scaled site map upon completion of each boring.

4.1.3 Groundwater Sample Collection

If groundwater is encountered in any of the soil borings, then groundwater will be sampled and analyzed. Groundwater samples will be collected within 24 hours of the completion of well purging using disposable bailers. Alternatively, well sampling may also be conducted in accordance with the NMED's Position Paper *Use of Low-Flow and other Non-Traditional Sampling Techniques for RCRA Compliant Groundwater Monitoring* (October 30, 2001, as updated). Sample collection methods will be documented in the field monitoring reports. The samples will be transferred to the appropriate, clean, laboratory-prepared containers provided by the analytical laboratory. Sample handling and chain-of-custody procedures will be in accordance with the procedures presented below in Section 4.1.4.

Groundwater samples intended for metals analysis will be submitted to the laboratory as both total and dissolved metals samples. QA/QC samples will be collected to monitor the validity of the groundwater sample collection procedures as follows:

- Field duplicate water samples will be obtained at a frequency of ten percent, with a minimum, of one duplicate sample per sampling event;
- Equipment rinsate blanks will be obtained for chemical analysis at the rate of ten percent or a minimum of one rinsate blank per sampling day. Equipment rinsate blanks will be collected at a rate of one per sampling day if disposable sampling equipment is used. Rinsate samples will be generated by rinsing deionized water through unused or decontaminated sampling equipment. The rinsate sample will be placed in the appropriate sample container and submitted with the groundwater samples to the analytical laboratory for the appropriate analyses; and
- Trip blanks will accompany laboratory sample bottles and shipping and storage containers intended for VOC analyses. Trip blanks will consist of a sample of analyte- free deionized water prepared by the laboratory and placed in an appropriate sample container. The trip blank will be prepared by the analytical laboratory prior to the sampling event and will be kept with the shipping containers and placed with other water samples obtained from the site each day. Trip blanks will be analyzed at a frequency of one for each shipping container of groundwater samples to be analyzed for VOCs.

4.1.4 Sample Handling

At a minimum, the following procedures will be used at all times when collecting samples during investigation, corrective action, and monitoring activities:

1. Neoprene, nitrile, or other protective gloves will be worn when collecting samples. New disposable gloves will be used to collect each sample;
2. All samples collected of each medium for chemical analysis will be transferred into clean sample containers supplied by the project analytical laboratory with the exception of soil, rock, and sediment samples obtained in Encore® samplers. Sample container volumes and preservation methods will be in accordance with the most recent standard EPA and industry accepted practices for use by accredited analytical laboratories. Sufficient sample volume will be obtained for the laboratory to complete the method-specific QC analyses on a laboratory-batch basis; and
3. Sample labels and documentation will be completed for each sample following procedures discussed below. Immediately after the samples are collected, they will be stored in a cooler with ice or other appropriate storage method until they are delivered to the analytical laboratory. Standard chain-of-custody procedures, as described below, will be followed for all samples collected. All samples will be submitted to the laboratory soon enough to allow the laboratory to conduct the analyses within the method holding times.

Chain-of-custody and shipment procedures will include the following:

1. Chain-of-custody forms will be completed at the end of each sampling day, prior to the transfer of samples off site.
2. Individual sample containers will be packed to prevent breakage and transported in a sealed cooler with ice or other suitable coolant or other EPA or industry-wide accepted method. The drainage hole at the bottom of the cooler will be sealed and secured in case of sample container leakage. Temperature blanks will be included with each shipping container.
3. Each cooler or other container will be delivered directly to the analytical laboratory.
4. Glass bottles will be separated in the shipping container by cushioning material to prevent breakage.
5. Plastic containers will be protected from possible puncture during shipping using cushioning material.
6. The chain-of-custody form and sample request form will be shipped inside the sealed storage container to be delivered to the laboratory.
7. Chain-of-custody seals will be used to seal the sample-shipping container in conformance with EPA protocol.
8. Signed and dated chain-of-custody seals will be applied to each cooler prior to transport of samples from the site.
9. Upon receipt of the samples at the laboratory, the custody seals will be broken, the chain-of-custody form will be signed as received by the laboratory, and the conditions of the samples will be recorded on the form. The original chain-of-custody form will remain with the laboratory and copies will be returned to the relinquishing party.
10. Copies of all chain-of-custody forms generated as part of sampling activities will be maintained on-site.

4.1.5 Collection and Management of Investigation Derived Waste

Drill cuttings, excess sample material and decontamination fluids, and all other investigation derived waste (IDW) associated with soil borings will be contained and characterized using methods based on the boring location, boring depth, drilling method, and type of contaminants suspected or encountered. All purged groundwater and decontamination water will be characterized prior to disposal unless it is disposed in the refinery wastewater treatment system upstream of the API Separator. An IDW management plan is included as Appendix D.

4.1.6 Field Equipment Calibration

Field equipment requiring calibration will be calibrated to known standards, in accordance with the manufacturers' recommended schedules and procedures. At a minimum, calibration checks will be conducted daily, or at other intervals approved by the Department, and the instruments will be recalibrated, if necessary. Calibration measurements will be recorded in the daily field logs. If field equipment becomes inoperable, its use will be discontinued until the necessary repairs are made. In the interim, a properly calibrated replacement instrument will be used.

4.1.7 Documentation of Field Activities

Daily field activities, including observations and field procedures, will be recorded in a field log book. Copies of the completed forms will be maintained in a bound and sequentially numbered field file for reference during field activities. Indelible ink will be used to record all field activities. Photographic documentation of field activities will be performed, as appropriate. The daily record of field activities will include the following:

1. Site or unit designation;
2. Date;
3. Time of arrival and departure;
4. Field investigation team members including subcontractors and visitors;
5. Weather conditions;
6. Daily activities and times conducted;
7. Observations;
8. Record of samples collected with sample designations and locations specified;
9. Photographic log, as appropriate;
10. Field monitoring data, including health and safety monitoring;
11. Equipment used and calibration records, if appropriate;
12. List of additional data sheets and maps completed;
13. An inventory of the waste generated and the method of storage or disposal; and
14. Signature of personnel completing the field record.

4.1.8 Chemical Analyses

All samples collected for laboratory analysis will be submitted to an accredited laboratory. The laboratory will use the most recent standard EPA and industry-accepted analytical methods for target analytes as the testing methods for each medium sampled. Chemical analyses will be performed in accordance with the most recent EPA standard analytical methodologies and extraction methods.

Groundwater and soil samples will be analyzed by the following methods:

- SW-846 Method 8260 for Skinner List volatile organic compounds;
- SW-846 Method 8270 for Skinner List semi-volatile organic compounds; and
- SW-846 Method 8015B gasoline range (C5-C10), diesel range (>C10-C28), and motor oil range (>C28-C36) organics.

Groundwater and soil samples will also be analyzed for the following Skinner List metals and iron and manganese using the indicated analytical methods shown below. Groundwater samples for metals analyses will be collected and analyzed for total and dissolved analyses. Groundwater samples will also be analyzed for chloride, fluoride, and sulfate.

Inorganic Analytical Methods

Analyte	Analytical Method
Antimony	SW-846 method 6010/6020
Arsenic	SW-846 method 6010/6020
Barium	SW-846 method 6010/6020
Beryllium	SW-846 method 6010/6020
Cadmium	SW-846 method 6010/6020
Chromium	SW-846 method 6010/6020
Chromium VI	SW-846 method 3060A
Cobalt	SW-846 method 6010/6020
Cyanide	SW-846 method 335.4/335.2 mod
Lead	SW-846 method 6010/6020
Mercury	SW-846 method 7470/7471
Nickel	SW-846 method 6010/6020
Selenium	SW-846 method 6010/6020
Silver	SW-846 method 6010/6020

Vanadium	SW-846 method 6010/6020
Zinc	SW-846 method 6010/6020
Iron	SW-846 method 6010/6020
Manganese	SW-846 method 6010/6020

As discussed previously, if collected, groundwater field measurements will be obtained for pH, specific conductance, dissolved oxygen concentrations, oxidation-reduction potential, and temperature.

4.1.9 Data Quality Objectives

The Data Quality Objectives (DQOs) were developed to ensure that newly collected data are of sufficient quality and quantity to address the projects goals, including Quality Assurance/Quality Control (QA/QC) issues (EPA, 2006). The project goals are established to determine and evaluate the presence, nature, and extent of releases of contaminants at specified SWMUs. The type of data required to meet the project goals includes chemical analyses of soil and groundwater to determine if there has been a release of contaminants at the SWMU.

The quantity of data is SWMU specific and is based on the historical operations at individual locations. Method detection limits should be 20% or less of the applicable background levels, cleanup standards and screening levels.

Additional DQOs include precision, accuracy, representativeness, completeness, and comparability. Precision is a measurement of the reproducibility of measurements under a given set of circumstances and is commonly stated in terms of standard deviation or coefficient of variation (EPA, 1987). Precision is also specific to sampling activities and analytical performance. Sampling precision will be evaluated through the analyses of duplicate field samples and laboratory replicates will be utilized to assess laboratory precision.

Accuracy is a measurement in the bias of a measurement system and may include many sources of potential error, including the sampling process, field contamination, preservation, handling, sample matrix, sample preparation, and analysis techniques (EPA, 1987). An evaluation of the accuracy will be performed by reviewing the results of field/trip blanks, matrix spikes, and laboratory QC samples.

Representativeness is an expression of the degree to which the data accurately and precisely represent the true environmental conditions. Sample locations and the number of samples have

been selected to ensure the data is representative of actual environmental conditions. Based on SWMU specific conditions, this may include either biased (i.e., judgmental) locations/depths or unbiased (systematic grid samples) locations. In addition, sample collection techniques (e.g., field monitoring and decontamination of sampling equipment) will be utilized to help ensure representative results.

Completeness is defined as the percentage of measurements taken that are actually valid measurements, considering field QA and laboratory QC problems. EPA Contract Laboratory Program (CLP) data has been found to be 80-85% complete on a nationwide basis and this has been extrapolated to indicate that Level III, IV, and V analytical techniques will generate data that are approximately 80% complete (EPA, 1987). As an overall project goal, the completeness goal is 85%; however, some samples may be critical based on location or field screening results and thus a sample-by-sample evaluation will be performed to determine if the completeness goals have been obtained.

Comparability is a qualitative parameter, which expresses the confidence with which one data set can be compared to another. Industry standard sample collection techniques and routine EPA analytical methods will be utilized to help ensure data are comparable to historical and future data. Analytical results will be reported in appropriate units for comparison to historical data and cleanup levels.

Section 5

References

EPA, 1987, Data Quality Objectives for Remedial Response Activities; United States Environmental Protection Agency, Office of Emergency and Remedial Response and Office of Waste Programs Enforcement, OSWER Directive 9355.0-7B, 85p

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EPA, 2006, Guidance on Systematic Planning Using the Data Quality Objectives Process, United States Environmental Protection Agency, Office of Environmental Information; EPA/240/B-06/001, p. 111.

Giant Refining Company, 1991, RCRA Facility Investigation, Phase I – Final Report, Ciniza Refinery, Gallup New Mexico, p. 1216.

Giant Refining Company, 1994, Report on Additional RFI Sampling, Ciniza Refinery, Gallup New Mexico.

Giant Refining Company, 2001, Ciniza Refinery No Further Action Report, August 2001.

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Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizel, N.H., and Padgett, E.T., 1983, *Hydrogeology and Water Resources of San Juan Basin, New Mexico*; Hydrogeologic Report 6, New Mexico Bureau of Mines and Mineral Resources, p. 70.

USDA, 2005, Soil Survey of McKinley County Area, New Mexico, McKinley County and Parts of Cibola and San Juan Counties, p. 683.

Western Refining, 2009, Annual Ground Water Monitoring Report Gallup Refinery – 2009.

Tables

TABLE 1
1990 RCRA Facility Investigation Soil Analytical Data
Western Refining Southwest, Inc. - Gallup Refinery

Analyte	Sample ID	RFI1001 V0.0	RFI1001 V3.0	RFI1001 D3.0	RFI1003 V12.5	RFI1003 V9.0	RFI1003 V6.0	RFI1003 V3.0	RFI1003 V0.0	RFI1004 V0.0	RFI1004 V3.0	RFI1004 V6.0	RFI1004 V9.0	RFI1004 V12.5	RFI1005 V0.0	RFI1005 V3.0	RFI1005 V6.0	RFI1005 V9.0	RFI1005 V12.5	RFI1005 D3.0	RFI1002 V0.0	RFI1002 V3.0	RFI1002 V6.0	RFI1002 V9.0	RFI1002 V12.5	RFI1005 D12.5	NMED Soil Screening Levels				EPA Regional Soil Screening Levels			
	Sample Depth (ft)	0	3	3	12.5	9	6	3	0	0	3	6	9	12.5	0	3	6	9	12.5	3	0	3	6	9	12.5	12.5	Residential Soil (mg/kg)	Industrial/ Occupation al Soil (mg/kg)	Construction Worker Soil (mg/kg)	Risk-based SSL for a DAF of 1 (mg/kg)	Resident Soil (mg/kg)	Industrial Soil (mg/kg)	Groundwater Protection Risk-based (mg/kg)	Groundwater Protection MCL-based (mg/kg)
	Sample Date	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990									
Metals																																		
Antimony	mg/kg	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	NA	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	3.13E+01	4.54E+02	1.24E+02	6.61E-01	3.10E+01	4.10E+02	6.60E-01	2.70E-01
Arsenic	mg/kg	0.97	<1.0	<0.50	<1.0	0.52	0.58	0.90	0.65	0.60	0.64	2.4	0.6	<1.0	<1.0	0.52	27.9	0.58	<1.0	NA	0.52	0.79	0.58	<1.0	<0.50	<0.50	3.90E+00	1.77E+01	5.30E+01	1.31E-02	3.90E-01	1.60E+00	1.30E-03	2.90E-01
Barium	mg/kg	372	107	105	392	152	178	292	317	280	195	422	213	164	315	321	700	48.7	187	NA	188	231	332	201	171	124	1.56E+04	2.23E+05	4.35E+03	3.01E+02	1.50E+04	1.90E+05	3.00E+02	8.20E+01
Beryllium	mg/kg	0.7	1.0	1.1	1.1	1.0	1.0	0.65	0.96	0.93	0.79	0.80	1.00	1.1	0.88	0.85	0.76	1.4	1.2	NA	1.0	0.90	0.90	1.4	0.87	1.1	1.56E+02	2.26E+03	1.44E+02	5.77E+01	1.60E+02	2.00E+03	5.80E+01	3.20E+00
Cadmium	mg/kg	<0.50	0.70	<0.50	0.73	<0.50	<0.50	<0.50	<0.50	<0.50	0.56	<0.50	<0.50	<0.50	<0.50	<0.50	1.5	<0.50	<0.50	NA	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	7.03E+01	8.97E+02	2.77E+02	1.37E+00	7.00E+01	8.00E+02	1.40E+00	3.80E-01
Chromium total results - CR III SL	mg/kg	60.1	6.1	7.8	7.5	5.9	6.5	6.1	9.5	5.6	11.6	398	21.7	7.2	6.8	6.3	4020	11.6	8.9	NA	7.0	117	6.7	8.0	6.4	6.1	1.17E+05	1.70E+06	4.65E+05	9.86E+07	1.20E+05	1.50E+06	9.90E+07	NA
Chromium total results - CR VI SL	mg/kg	60.1	6.1	7.8	7.5	5.9	6.5	6.1	9.5	5.6	11.6	398	21.7	7.2	6.8	6.3	4020	11.6	8.9	NA	7.0	117	6.7	8.0	6.4	6.1	2.97E+00	6.31E+01	6.56E+01	8.31E-03	2.30E+02	1.40E+03	2.10E+00	NA
Cobalt	mg/kg	2.0	3.6	4.6	3.2	3.4	2.8	2.0	2.6	2.8	2.2	4.8	3.8	4.4	4.0	4.4	8.4	5.7	5.1	NA	4.3	4.4	3.9	6.0	5.4	3.9	NA	NA	NA	NA	2.30E+01	3.00E+02	4.90E-01	NA
Copper	mg/kg	10.3	5.9	7.4	7.0	5.6	6.1	4.3	7.4	5.7	4.1	29.0	6.2	6.9	9.2	4.6	215	11.8	7.2	NA	6.4	16.5	5.2	7.7	7.7	7.8	3.10E+03	4.54E+04	1.24E+04	2.14E+01	NA	NA	NA	NA
Lead	mg/kg	11.1	5.5	6.3	7.8	8.1	6.5	5.5	8.4	8.2	7.0	50.0	12.5	13.3	13.2	11.8	337	16.1	14.2	NA	13.8	19.3	13.5	14.9	11.9	16.0	4.00E+02	8.00E+02	8.00E+02	NA	4.00E+02	8.00E+02	NA	NA
Mercury	mg/kg	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	1.3	<0.10	<0.10	<0.10	<0.10	2.9	<0.10	<0.10	NA	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	1.56E+01	7.36E+01	1.36E+01	3.27E-02	4.40E+00	3.00E-01	1.00E-01	
Nickel	mg/kg	7.0	6.7	9.1	8.5	6.8	6.5	5.4	6.5	6.1	5.3	9.0	7.9	8.0	5.8	6.8	19.2	11.3	9.3	NA	6.4	9.2	6.5	9.5	8.5	6.9	1.56E+03	2.25E+04	6.19E+03	4.77E+01	1.40E+04	6.90E+04	4.80E+01	NA
Potassium	mg/kg	972	1310	1660	1410	1340	1070	866	1020	853	783	2320	1200	1210	850	834	3920	1450	1250	NA	806	1310	841	1380	1410	1010	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	mg/kg	<1.0	<1.0	<1.0	<0.50	<0.50	<0.50	<0.50	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	<1.0	<1.0	NA	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	3.91E+02	5.68E+03	1.55E+03	9.65E-01	3.90E+02	5.10E+03	9.50E-01	2.60E-01
Vanadium	mg/kg	16.3	14.0	16.3	17.5	14.3	12.9	15.2	15.7	15.5	14.4	18.6	13.9	13.7	14.5	14.1	24.2	18.7	16.2	NA	15.4	18.2	18.8	16.5	18.0	14.0	3.91E+02	5.68E+03	1.55E+03	1.83E+02	5.50E+02	7.20E+03	2.60E+02	NA
Zinc	mg/kg	81.3	14.7	17.7	16.1	13.9	13.0	12.9	16.4	14.0	15.2	81.2	12.5	12.5	11.8	13.1	538	17.9	14.3	NA	13.4	228	11.2	15.2	15.0	12.4	2.35E+04	3.41E+05	9.29E+04	6.82E+02	2.30E+04	3.10E+05	6.80E+02	NA
Method 8240																																		
1,1,1-Trichloroethane	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	1.56E+04	7.89E+04	1.48E+04	2.91E+00	9.00E+03	3.90E+04	3.30E+00	7.20E-02
1,1,2,2-Tetrachloroethane	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	8.02E+00	4.35E+01	2.21E+02	2.13E-04	5.90E-01	2.90E+00	2.80E-05	NA
1,1,2-Trichloroethane	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	2.81E+00	1.33E+01	4.72E+02	1.12E-04	1.10E+00	5.50E+00	8.20E-05	1.70E-03
1,1-Dichloroethane	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	6.45E+01	3.59E+02	1.70E+03	5.98E-03	3.40E+00	1.70E+01	7.00E-04	NA
1,1-Dichloroethene	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	4.49E+02	2.29E+03	4.32E+02	1.16E-01	2.50E+02	1.10E+03	1.20E-01	2.60E-03
1,2,3-Trichloropropane	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	4.97E-02	3.76E+01	7.23E+00	2.50E-06	9.10E-02	4.10E-01	4.40E-06	NA
1,2-Dichloroethane	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	7.89E+00	4.35E+01	5.87E+01	3.56E-04	4.50E-01	2.20E+00	4.40E-05	1.50E-03
1,2-Dichloropropane	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	1.52E+01	8.44E+01	2.50E+01	1.07E-03	9.30E-01	1.470E+00	1.30E-04	1.70E-03
2-Butanone (MEK)	ug/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<500	<120	<20	<5	<5	<340	<10	<5	<5	<5	<5	<5	<5	<5	<5	3.71E+04	3.75E+05	8.43E+04	1.27E+00	2.80E+04	1.90E+05	1.50E+00	NA
2-Hexanone	ug/kg	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<100	<25	<4	<1	<1	<67	<2	<1	<1	<1	<1	<1	<1	<1	<1	NA	NA	NA	NA	2.0E+02	1.3E+03	8.8E-03	NA
4-Methyl-2-pentanone (MIBK)	ug/kg	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<100	<25	<4	<1	<1	<67	<2	<1	<1	<1	<1	<1	<1	<1	<1	NA	NA	NA	NA	NA	NA	NA	NA
Acetone	ug/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<500	<120	<20	<5	<5	<340	<10	<5	<5	<5	<5	<5	<5	<5	<5	6.66E+04	8.68E+05	2.21E+05	3.86E+00	6.10E+04	6.10E+05	4.40E+00	NA
Benzene	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	1.7	<50.0	<12.0	<2.0	<0.5	<0.5	37	<1	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	1.54E+01	8.47E+01	1.38E+02	1.73E-03	1.10E+00	5.60E+00	2.30E-04	2.80E-03
Bromodichloromethane	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	5.41E+00	3.01E+01	1.43E+02	2.71E-04	2.80E-01	1.40E+00	3.30E-05	NA
Bromoform	ug/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<50.0	<12.0	<2.0	<0.5	<0.5	<34.0	<1.0	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	6.16E+02	2.42E+03	4.76E+03	6.04E-01	6.10E+01			

TABLE 1
1990 RCRA Facility Investigation Soil Analytical Data
Western Refining Southwest, Inc. - Gallup Refinery

Analyte	Sample ID	RFI1001 V0.0	RFI1001 V3.0	RFI1001 D3.0	RFI1003 V12.5	RFI1003 V9.0	RFI1003 V6.0	RFI1003 V3.0	RFI1003 V0.0	RFI1004 V0.0	RFI1004 V3.0	RFI1004 V6.0	RFI1004 V9.0	RFI1004 V12.5	RFI1005 V0.0	RFI1005 V3.0	RFI1005 V6.0	RFI1005 V9.0	RFI1005 V12.5	RFI1005 D3.0	RFI1002 V0.0	RFI1002 V3.0	RFI1002 V6.0	RFI1002 V9.0	RFI1002 V12.5	RFI1005 D12.5	NMED Soil Screening Levels				EPA Regional Soil Screening Levels			
	Sample Depth (ft)	0	3	3	12.5	9	6	3	0	0	3	6	9	12.5	0	3	6	9	12.5	3	0	3	6	9	12.5	12.5	Residential Soil (mg/kg)	Industrial/ Occupation al Soil (mg/kg)	Construction Worker Soil (mg/kg)	Risk-based SSL for a DAF of 1 (mg/kg)	Resident Soil (mg/kg)	Industrial Soil (mg/kg)	Groundwater Protection Risk-based (mg/kg)	Groundwater Protection MCL-based (mg/kg)
	Sample Date	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990									
2-Chloronaphthalene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	6.26E+03	9.08E+04	2.48E+04	1.14E+01	6.30E+03	8.20E+04	1.80E+01	NA
2-Chlorophenol	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	3.91E+02	5.68E+03	1.55E+03	1.16E-01	3.90E+02	5.10E+03	2.00E-01	NA
2-Methylnaphthalene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	290	<5.0	5	<5.0	<5.0	1400	<5.0	<5.0	<5.0	<5.0	56	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	3.10E+02	4.10E+03	9.00E-01	NA
o-Cresol	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	16	<5.0	<5.0	<5.0	<5.0	<100	34	19	<5.0	<5.0	<10	<5.0	<5.0	<5.0	16	NA	NA	NA	NA	3.10E+03	3.10E+04	2.00E+00	NA
2-Nitroaniline	ug/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<500	<25	<25	<25	<25	<50	<25	<25	<25	<25	NA	NA	NA	NA	1.80E+02	1.80E+03	3.30E-02	NA
2-Nitrophenol	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA
3,3'-Dichlorobenzidine	ug/kg	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<200	<10	<10	<10	<10	<20	<10	<10	<10	<10	1.08E+01	4.26E+01	3.64E+02	7.40E-03	1.10E+00	3.80E+00	2.30E-03	NA
m & p-Cresol(s)	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	26	<5.0	<5.0	<5.0	<5.0	120	68	34	<5.0	<5.0	<10	<5.0	<5.0	<5.0	28	NA	NA	NA	NA	3.10E+02	3.10E+03	1.90E-01	NA
3-Nitroaniline	ug/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<500	<25	<25	<25	<25	<50	<25	<25	<25	<25	NA	NA	NA	NA	NA	NA	NA	NA
4,6-Dinitro-o-cresol	ug/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<500	<25	<25	<25	<25	<50	<25	<25	<25	<25	NA	NA	NA	NA	NA	NA	NA	NA
4-Bromophenyl Phenyl ether	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA
4-Chloro-3-methylphenol	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA
4-Chloroaniline	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	2.40E+00	8.60E+00	1.20E-04	NA
4-Chlorophenyl	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA
4-Nitroaniline	ug/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<500	<25	<25	<25	<25	<50	<25	<25	<25	<25	NA	NA	NA	NA	2.40E+01	8.60E+01	1.00E-03	NA
4-Nitrophenol	ug/kg	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<50	<25	<25	<25	<25	<500	<25	<25	<25	<25	<50	<25	<25	<25	<25	NA	NA	NA	NA	NA	NA	NA	NA
Acenaphthene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	3.44E+03	3.67E+04	1.86E+04	1.69E+01	3.40E+03	3.30E+04	2.70E+01	NA
Acenaphthylene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA
Aniline	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	8.50E+01	3.00E+02	3.40E-03	NA
Anthracene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	1.72E+04	1.83E+05	6.68E+04	2.71E+02	1.70E+04	1.70E+05	4.50E+02	NA
Benzo(a)anthracene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	1.48E+00	2.34E+01	2.13E+02	7.83E-02	1.50E-01	2.10E+00	1.40E-02	NA
Benzo(a)pyrene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	1.48E-01	2.34E+00	2.13E+01	2.60E-02	1.50E-02	2.10E-01	4.60E-03	3.10E-01
Benzo(b)fluoranthene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	1.48E+00	2.34E+01	2.13E+02	2.65E-01	1.50E-01	2.10E+00	4.70E-02	NA
Benzo(g,h,i)perylene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	1.48E+01	2.34E+02	2.06E+03	2.60E+00	1.50E+00	2.10E+01	4.60E-01	NA
Benzoic acid	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	2.40E+05	2.50E+06	3.30E+01	NA
Benzyl alcohol	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	3.10E+04	3.10E+05	4.20E+00	NA
bis(2-Chloroethoxy)-methane	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	1.80E+02	1.80E+03	2.30E-02	NA
bis(2-Chloroethy1) ether	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	2.68E+00	1.42E+01	7.78E+01	2.63E-05	1.90E-01	9.00E-01	2.70E-06	NA
bis(2-Chloroisopropyl)-ether	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	9.15E+01	4.54E+02	3.10E+03	2.33E-03	NA	NA	NA	NA
bis(2-Ethylhexyl)phthalate	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	3.47E+02	1.37E+03	4.76E+03	8.62E+00	3.50E+01	1.20E+02	1.60E+00	2.00E+00
Butyl benzyl phthalate	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	2.60E+02	9.10E+02	6.70E-01	NA
Chrysene	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	1.48E+02	2.34E+03	2.06E+04	7.99E+00	1.50E+01	2.10E+02	1.40E+00	NA
Dibenz(a,h)anthracene	ug/kg	<5</																																

TABLE 1
1990 RCRA Facility Investigation Soil Analytical Data
Western Refining Southwest, Inc. - Gallup Refinery

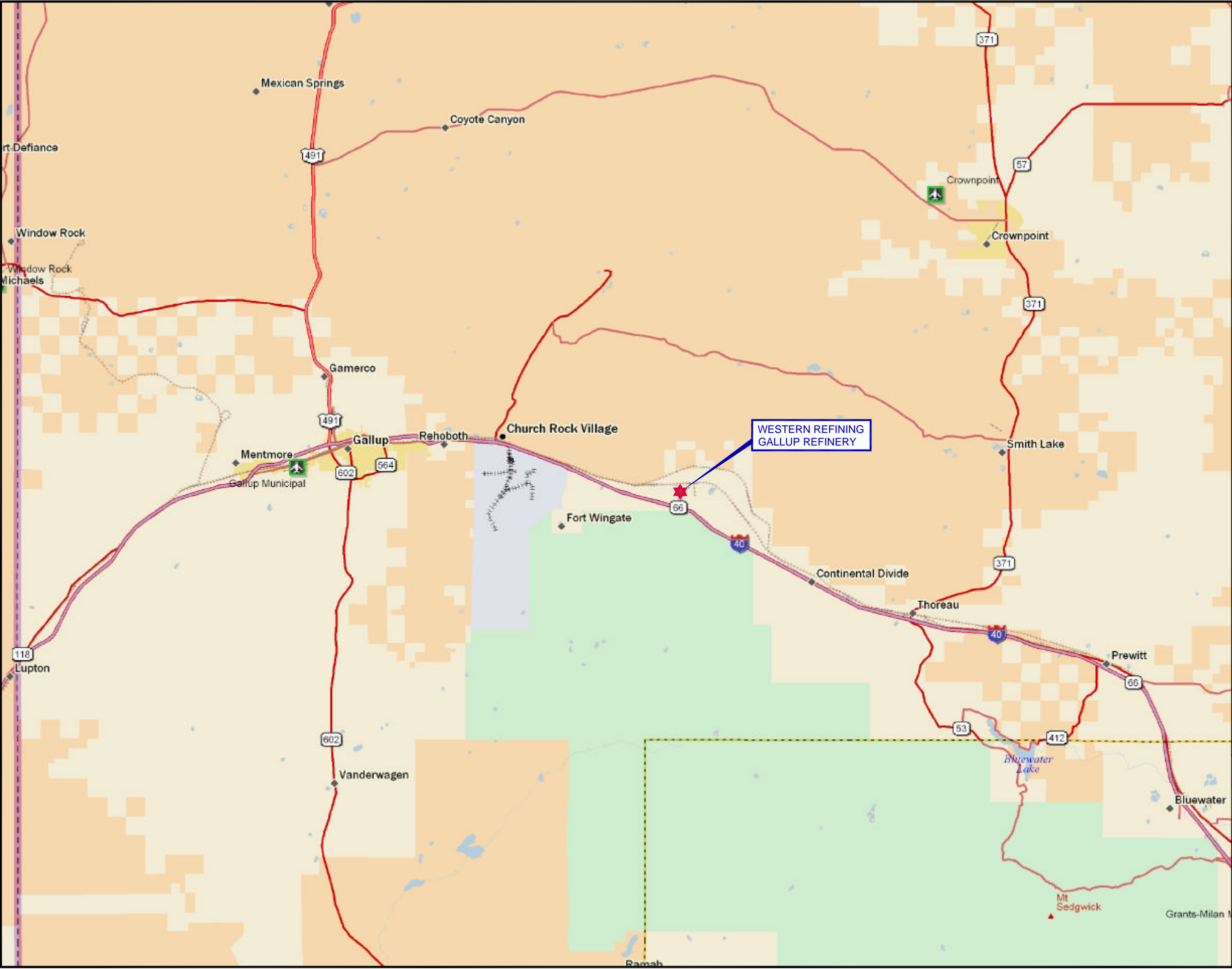
Analyte	Sample ID	RFI1001 V0.0	RFI1001 V3.0	RFI1001 D3.0	RFI1003 V12.5	RFI1003 V9.0	RFI1003 V6.0	RFI1003 V3.0	RFI1003 V0.0	RFI1004 V0.0	RFI1004 V3.0	RFI1004 V6.0	RFI1004 V9.0	RFI1004 V12.5	RFI1005 V0.0	RFI1005 V3.0	RFI1005 V6.0	RFI1005 V9.0	RFI1005 V12.5	RFI1005 D3.0	RFI1002 V0.0	RFI1002 V3.0	RFI1002 V6.0	RFI1002 V9.0	RFI1002 V12.5	RFI1005 D12.5	NMED Soil Screening Levels				EPA Regional Soil Screening Levels			
	Sample Depth (ft)	0	3	3	12.5	9	6	3	0	0	3	6	9	12.5	0	3	6	9	12.5	3	0	3	6	9	12.5	12.5	Residential Soil (mg/kg)	Industrial/ Occupation al Soil (mg/kg)	Construction Worker Soil (mg/kg)	Risk-based SSL for a DAF of 1 (mg/kg)	Resident Soil (mg/kg)	Industrial Soil (mg/kg)	Groundwater Protection Risk-based (mg/kg)	Groundwater Protection MCL-based (mg/kg)
	Sample Date	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990	6/28/1990									
Phenacetin	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<50	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	2.4E+02	1.0E+03	9.7E-03	NA	
phenyl ether	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<50	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	
Pronamide (kerb)	ug/kg	<5	<5	<5	<5	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	<100	<50	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	4.6E+03	6.2E+04	1.2E+00	NA	

Bolded Value - concentration exceeds screening level
NA - Screening level not available or not analyzed
DAF - Dilution attenuation factor
NMED Screening levels (June 2012)
EPA Regional Screening Levels (Nov. 2012)

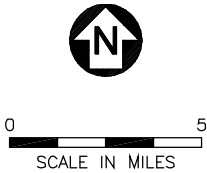
TABLE 2
1994 RCRA Facility Investigation Soil Analytical Data
Western Refining Southwest, Inc. - Gallup Refinery

Analyte	Sample ID	RF11014 V19.0	RF11014 V25.0	RF11015 V19.0	RF11015 V25.0	RF11016 V19.0	RF11016 V25.0	RF11017 V19.0	RF11017 V25.0	RF11018 V19.0	RF11018 V25.0	RF11019 V19.0	RF11019 V19.0D	RF11019 V25.0	RF11020 V19.0	RF11020 V25.0	RF11021 V19.0	RF11021 V25.0	NMED Soil Screening Levels				EPA Regional Soil Screening Levels				
	Sample Depth (ft)																		Residential Soil (mg/kg)	Industrial/ Occupational Soil (mg/kg)	Construction Worker Soil (mg/kg)	Risk-based SSL for a DAF of 1 (mg/ka)	Resident Soil (mg/kg)	Industrial Soil (mg/kg)	Groundwater Protection Risk-based (mg/kg)	Groundwater Protection MCL-based (mg/kg)	
	Sample Date	7/26/1994	7/26/1994	7/26/1994	7/26/1994	7/26/1994	7/26/1994	7/26/1994	7/26/1994	7/26/1994	7/27/1994	7/27/1994	7/27/1994	7/27/1994	7/27/1994	7/27/1994	7/27/1994	7/27/1994	7/27/1994								
Metals																											
Arsenic	mg/kg	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	3.9E+00	1.8E+01	5.3E+01	1.3E-02	6.1E-01	2.4E+00	1.3E-03	2.90E-01	
Barium	mg/kg	370	1100	360	190	310	340	420	610	410	690	400	370	630	400	360	520	680	1.6E+04	2.2E+05	4.4E+03	3.0E+02	1.5E+04	1.9E+05	1.2E+02	8.20E+01	
Beryllium	mg/kg	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	1.6E+02	2.3E+03	1.4E+02	5.8E+01	1.6E+02	2.0E+03	1.3E+01	3.20E+00	
Cadmium	mg/kg	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	7.0E+01	9.0E+02	2.8E+02	1.4E+00	NA	NA	5.2E-01	3.80E-01	
Chromium	mg/kg	8.2	9.1	14	8	10	14	8.2	12	7.6	8.4	12	8.5	8.9	11	14	13	9.4	1.2E+05	1.7E+06	4.6E+05	9.9E+07	1.2E+05	1.5E+06	2.8E+07	NA	
Lead	mg/kg	15	11	17	14	19	16	17	15	14	17	19	17	20	16	20	19	20	4.0E+02	8.0E+02	8.0E+02	NA	4.0E+02	1.8E+02	8.0E+02	1.40E+01	
Mercury	mg/kg	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	1.6E+01	7.4E+01	1.4E+01	3.3E-02	1.0E+01	4.3E+01	3.3E-02	1.00E-01	
Nickel	mg/kg	17	18	18	18	19	20	19	18	17	15	16	13	17	16	19	16	17	1.6E+03	2.3E+04	6.2E+03	4.8E+01	1.5E+03	2.0E+04	2.0E+01	NA	
Vanadium	mg/kg	4.1	5.3	5.2	4.8	<2.5	4.6	3.4	9.5	4.4	4.0	5.5	<2.5	3.3	4.3	5.0	6.8	4.7	3.9E+02	5.7E+03	1.5E+03	1.8E+02	3.9E+02	5.1E+03	6.3E+01	NA	
8240/8260 Skinner List																											
1,2-Dibromoethane	mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	5.9E-01	3.2E+00	1.6E+01	1.5E-05	3.4E-02	1.7E-01	1.8E-06	1.40E-05	
1,4-Dichloroethane	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	7.9E+00	4.4E+01	5.9E+01	3.6E-04	4.3E-01	2.2E+00	4.2E-05	1.40E-03	
1,4-Dioxane	mg/kg	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	4.9E+01	1.9E+02	1.7E+03	1.2E-03	4.9E+00	1.7E+01	1.4E-04	NA	
2-butanone (MEK)	mg/kg	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	3.7E+04	3.7E+05	8.4E+04	1.3E+00	2.8E+04	2.0E+05	1.0E+00	NA	
2-Chloroethylvinyl ether	mg/kg	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	NA	NA	NA	NA	NA	NA	NA	NA	
Benzene	mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	1.5E+01	8.5E+01	1.4E+02	1.7E-03	1.1E+00	5.4E+00	2.0E-04	2.60E-03	
Carbon Disulfide	mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	1.5E+03	8.3E+03	1.6E+03	2.8E-01	8.2E+02	3.7E+03	2.1E-01		
Chlorobenzene	mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	3.8E+02	2.1E+03	4.1E+02	4.9E-02	2.9E+02	1.4E+03	4.9E-02	6.80E-02	
Ethylbenzene	mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	6.8E+01	3.8E+02	1.8E+03	1.3E-02	5.4E+00	2.7E+01	1.5E-03	7.80E-01	
Styrene	mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	7.3E+03	5.0E+04	1.0E+04	1.4E-00	6.3E+03	3.6E+04	1.2E+00	1.10E-01	
Toluene	mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	5.3E+03	5.8E+04	1.3E+04	1.3E+00	5.0E+03	4.5E+04	5.9E-01	6.90E-01	
Xylenes	mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	8.1E+02	4.0E+03	7.4E+02	1.6E-01	6.3E+02	2.7E+03	1.9E-01	9.80E+00	
8270 Skinner List																											
1,2-Dichlorobenzene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.3E+03	1.4E+04	2.7E+03	2.8E-01	1.9E+03	9.8E+03	2.7E-01	5.80E-01	
1,3-Dichlorobenzene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	
1,4-Dichlorobenzene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	3.2E+01	1.8E+02	8.3E+02	3.2E-03	2.4E+00	1.2E+01	4.0E-04	7.20E-02	
2,4-Dimethylphenol	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.2E+03	1.4E+04	4.8E+03	6.7E-01	1.2E+03	1.2E+04	3.2E-01	NA	
2,4-Dinitrophenol	mg/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	1.2E+02	1.4E+03	4.8E+02	6.3E-02	1.2E+02	1.2E+03	3.4E-02	NA	
7,12-Dimethylbenz(a)anthracene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	4.3E-04	6.2E-03	8.5E-05	NA	
1-Methylnaphthalene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	1.6E+01	5.3E+01	5.1E-03	NA	
3-Methylphenol	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	6.1E+03	6.2E+04	1.1E+00	NA	
4-Methylphenol	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	6.1E+03	6.2E+04	NA	1.1E+00	
4-Nitrophenol	mg/kg	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	NA	NA	NA	NA	NA	NA	NA	NA	
Anthracene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.7E+04	1.8E+05	6.7E+04	2.7E+02	1.7E+04	1.7E+05	4.2E+01	NA	
Benzo(a)anthracene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5E+00	2.3E+01	2.1E+02	7.8E-02	1.5E-01	2.1E+00	1.0E-02	NA	
Benzo(a)pyrene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5E-01	2.3E+00	2.1E+01	2.6E-02	1.5E-02	2.1E-01	3.5E-03	2.40E-01	
Benzo(b)flouranthene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5E+00	2.3E+01	2.1E+02	2.7E-01	1.5E-01	2.1E+00	3.5E-02	NA	
Benzo(k)flouranthene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5E+01	2.3E+02	2.1E+03	2.6E+00	1.5E+00	2.1E+01	3.5E-01	NA	
Bis(2-ethylhexyl)phthalate	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	3.5E+02	1.4E+03	4.8E+03	8.6E+00	3.5E+01	1.2E+02	1.1E+00	1.40E+00	
Butyl benzyl phthalate	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	2.6E+02	9.1E+02	2.0E-01	NA	
Chrysene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5E+02	2.3E+03	2.1E+04	8.0E+00	1.5E+01	2.1E+02	1.1E+00	NA	
Dibenz(a,j)acridine	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	NA	NA	NA	NA	NA	NA	NA	NA	
Dibenzo(a,h)anthracene	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	1.5E-01	2.3E+00	2.1E+01	8.5E-02	1.5E-02	2.1E-01	1.1E-02	NA	
Diethyl phthalate	mg/kg	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	4.9E+04	5.5E+05	1.9E+05						

Figures



Map Source: DeLorme Street Atlas USA 2007 Plus.



PROJ. NO.: Western Refining | DATE: 07/13/14 | FILE: WestRef-B198

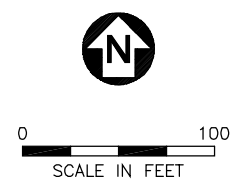
FIGURE 1
SITE LOCATION MAP
GALLUP REFINERY




8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



Aerial Map Source: Google Map, 02/19/2014.



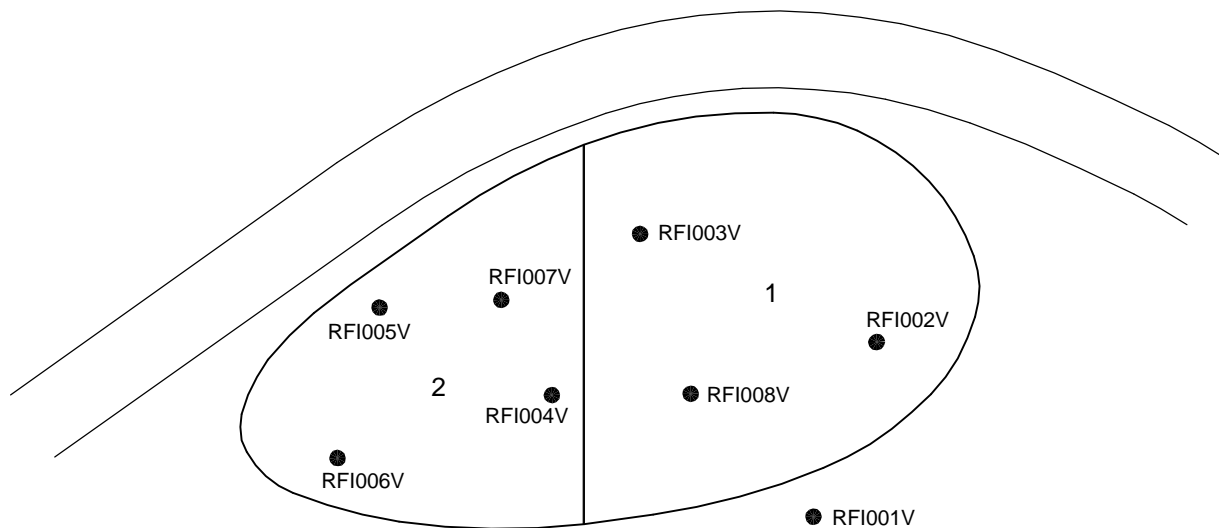
LEGEND
 SWMU No. 10 LOCATION



PROJ. NO.: Western Refining | DATE: 09/09/14 | FILE: WestRef-dB05

FIGURE 2
SWMU No. 10 LOCATION MAP

DiSorbo
Environmental Consulting Firm
8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



0 50
SCALE IN FEET

LEGEND

RFI002V ● 1990 RFI SOIL BORING LOCATION
AND IDENTIFICATION NUMBER

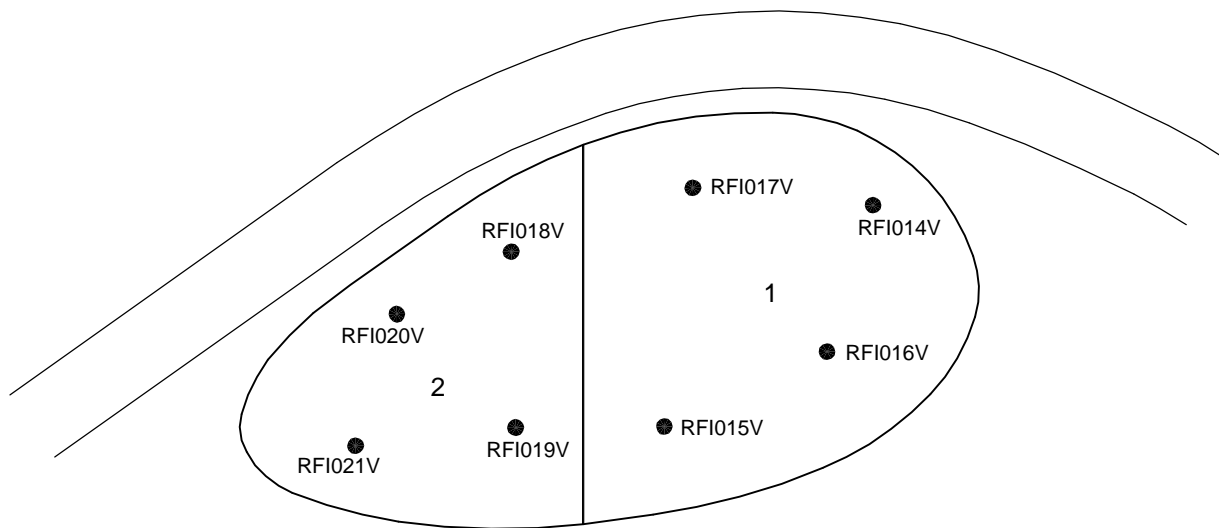


PROJ. NO.:Western Refining DATE:09/07/14 FILE:WestRef-dA02

FIGURE 3
SWMU No. 10
1990 RFI SAMPLE LOCATIONS
GALLUP REFINERY



8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



LEGEND

RFI014V ● 1994 RFI SOIL BORING LOCATION
AND IDENTIFICATION NUMBER

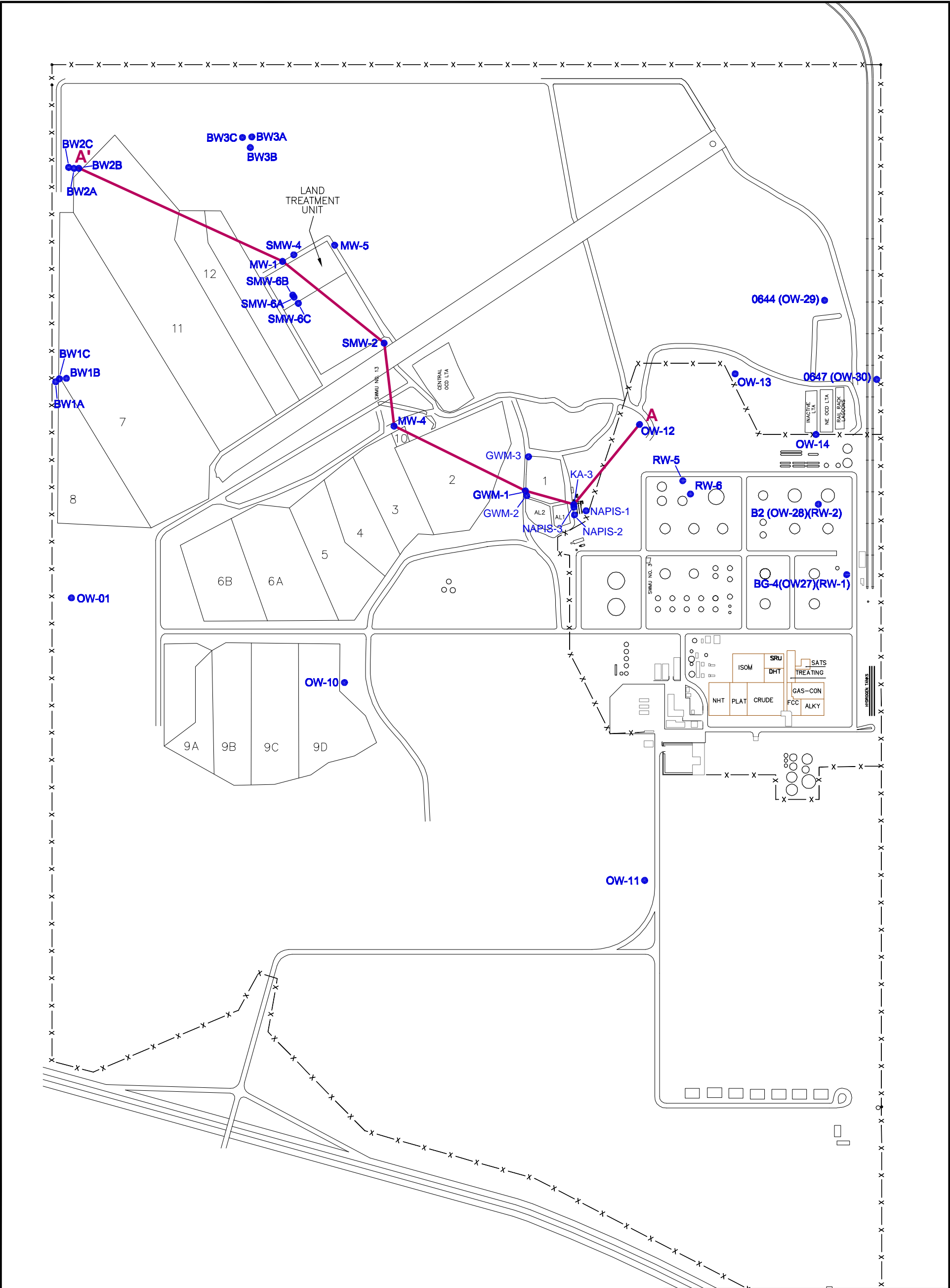



PROJ. NO.: Western Refining | DATE: 09/07/14 | FILE: WestRef-dA03

FIGURE 4
SWMU No. 10
1994 RFI SAMPLE LOCATIONS
GALLUP REFINERY



8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759





0 600
SCALE IN FEET

LEGEND


GWM-1 ● MONITORING WELL LOCATION

A — A' LINE OF CROSS SECTION

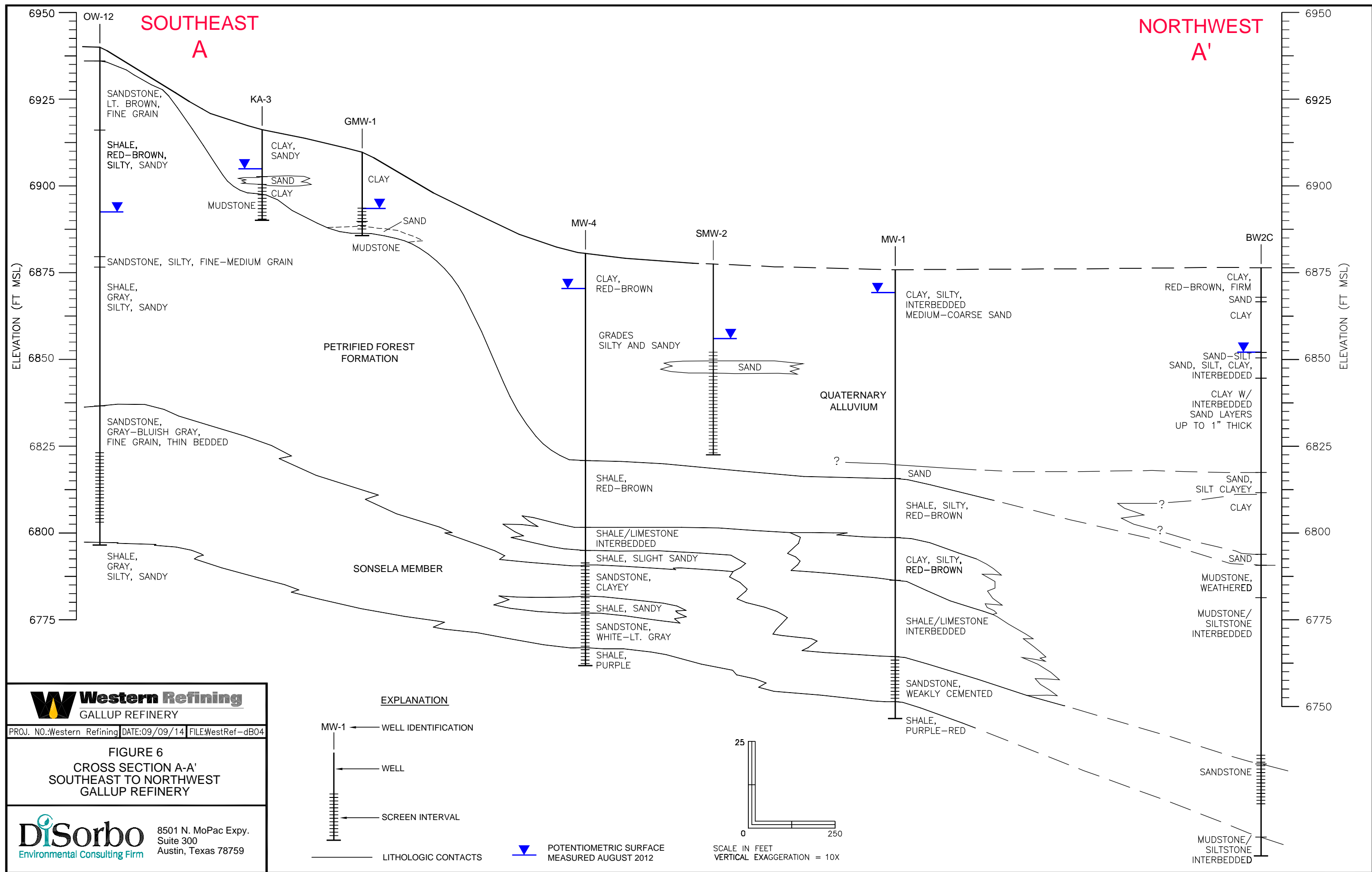
**Western Refining**
GALLUP REFINERY

PROJ. NO.:Western Refining|DATE:09/09/14|FILE:WestRef-dB03

FIGURE 5
CROSS SECTION LOCATION MAP
GALLUP REFINERY

**DiSorbo**
Environmental Consulting Firm

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Suite 300
Austin, Texas 78759

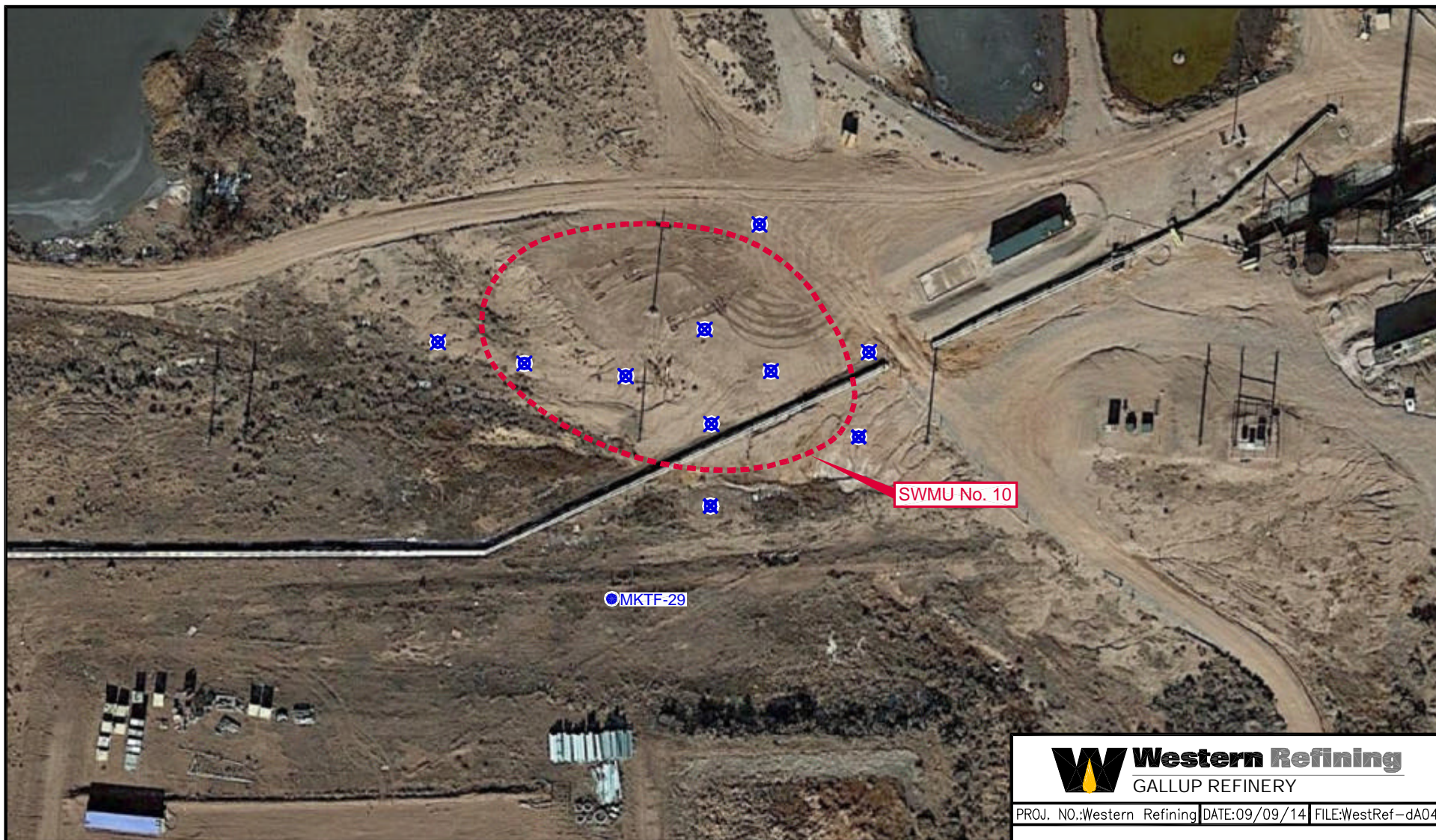


PROJ. NO.:Western Refining DATE:09/09/14 FILE:WestRef-dB04

FIGURE 6
CROSS SECTION A-A'
SOUTHEAST TO NORTHWEST
GALLUP REFINERY



8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759






Aerial Map Source: Google Map, 02/19/2014.



0 80
SCALE IN FEET

LEGEND

-  PROPOSED SOIL BORING LOCATION
-  EXISTING MONITORING WELL LOCATION
-  SWMU No. 10 LOCATION

Western Refining
GALLUP REFINERY

PROJ. NO.: Western Refining | DATE: 09/09/14 | FILE: WestRef-dA04

FIGURE 7
SWMU No. 10
PROPOSED SAMPLE LOCATIONS
GALLUP REFINERY

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Suite 300
Austin, Texas 78759

Appendix A

Photographs



Aerial Map Source: Google Map, 02/19/2014.



0 80
SCALE IN FEET

LEGEND



PHOTO IDENTIFICATION AND DIRECTION TAKEN

SWMU No. 10 LOCATION

Western Refining
GALLUP REFINERY

PROJ. NO.: Western Refining | DATE: 09/09/14 | FILE: WestRef-dA05

SWMU No. 10
PHOTO LOCATIONS MAP
GALLUP REFINERY

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Environmental Consulting Firm

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Suite 300
Austin, Texas 78759



Photo 1. Looking south from the north side of SWMU 10.



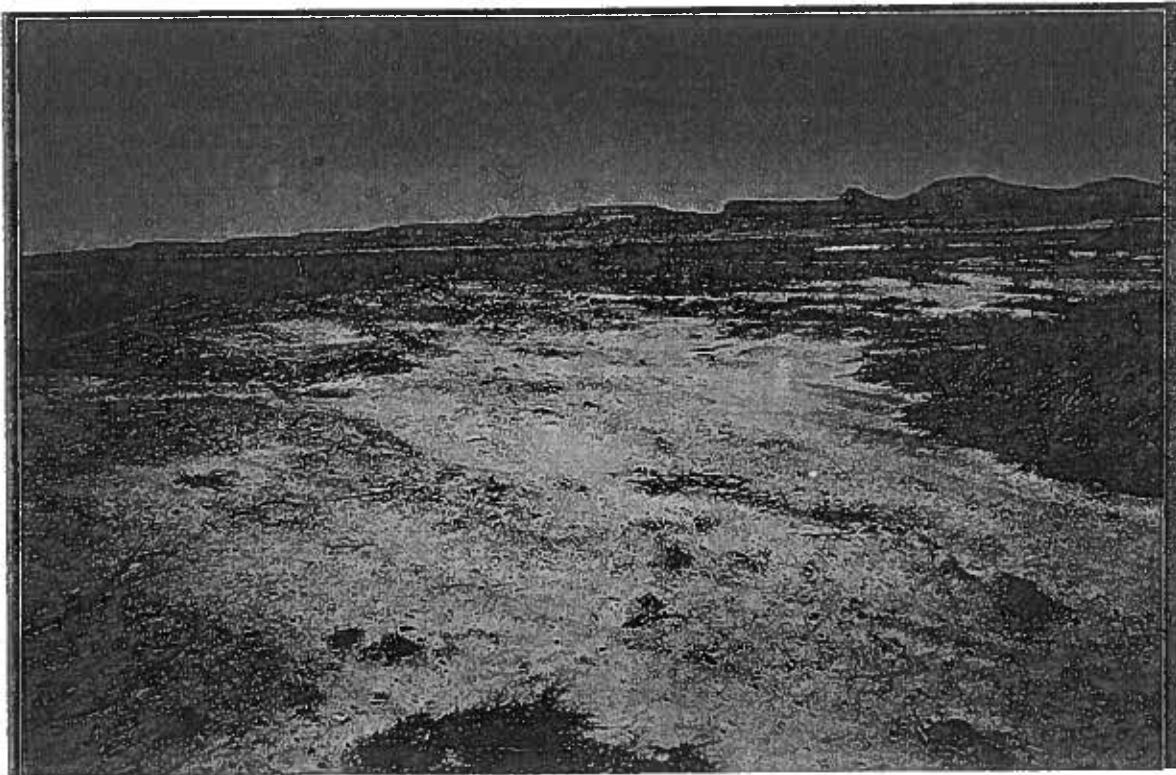
Photo 2. Looking southeast from north side of SWMU 10.

Appendix B
SWMU No. 10 Summary Report

SWMU #10 Summary Report

Sludge Pits

Ciniza Refinery
McKinley County, New Mexico



Prepared for:

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

Prepared by:

Practical Environmental Services, Inc.
1444 Wazee Street, Suite 225
Denver, Colorado 80202

Job No. 98-205-03

April 23, 1998

1.0 EXECUTIVE SUMMARY

Practical Environmental Services, Inc. (PES) has been retained by Giant-Ciniza Refinery (Ciniza) to perform a visual inspection, data evaluation, and status assessment for the sludge pits located at the Ciniza Refinery, in McKinley County, New Mexico.

The sludge pits area was identified as a Solid Waste Management Unit (SWMU), and designated as SWMU #10, during a RCRA Facility Investigation (RFI) conducted at the refinery in the early 1990's. This investigation included soil sampling and analysis, detected organic contaminants, and recommended corrective action.

In 1994, the Environmental Protection Agency Region VI Office (EPA) requested additional sampling at greater depth. Results confirmed previous findings. A corrective plan was prepared by Ciniza and approved by the EPA.

This summary report for SWMU #10 has been prepared in conjunction with submittal of a Resource Conservation and Recovery Act (RCRA) Part B permit application covering post closure care of the Ciniza Refinery Land Treatment Unit. All investigative activities for SWMU #10 have been completed. This assessment is summarized as follows.

- ⇒ Sludge was removed from the pits in 1980 and replaced with clean soil. The site was then covered with a layer of clean soil.
- ⇒ Soil sampling and analysis was conducted during an initial site investigation and subsequent re-investigation at greater depth. Organic contaminants were detected above corrective action levels.
- ⇒ SWMU #10 has been characterized in accordance with current applicable state and federal regulations.
- ⇒ Installation of an engineered earthen cap is recommended as corrective action for this site.

2.0 BACKGROUND

During 1987, a RCRA Facility Assessment was conducted at the Ciniza Refinery. This assessment identified various "solid waste management units" and recommended further evaluation. A RCRA Facility Investigation was subsequently conducted and the sludge pits area was identified as SWMU #10.

Applied Earth Sciences (AES) investigated the sludge pits area during the early 1990s. Soil samples were collected and analyzed. Organic contaminants were detected above State of New Mexico corrective action levels. Trace metals were also detected; of which, a few samples indicated levels slightly above ambient background concentration.

As a result of the investigation, AES recommended tilling the site to promote natural attenuation of organics, followed by capping to contain residual metals. Results and recommendations were reported to the EPA in 1990. In 1994, the EPA requested additional sampling at greater depth. Follow-up sampling and analysis confirmed the original findings.

3.0 SITE LOCATION AND DESCRIPTION

SWMU #10 is located within the Ciniza Refinery's property boundary. This refinery is located on the north side of Interstate 40, approximately 17 miles east of Gallup, New Mexico. Within the refinery, SWMU #10 is located approximately 200 feet southwest of the API separator. See Figure No. 1 for location details.

The sludge pits area is an oblong flat site measuring approximately 120 feet wide by 200 feet long. Within this area, two pits were previously excavated and filled with oily waste from the API separator.

In 1980, the sludge was removed from the pits and replaced with clean fill soil. The site was then covered with a layer of clean soil.

4.0 SITE INSPECTION

During the week of March 23, 1998, an on-site inspection was performed. Observations are noted as follows:

- The sludge pits area was observed vacant and inactive. No sign of soil staining or residual waste was evident at or in the vicinity of the site.
- Native shrubs and grasses were observed growing throughout the general vicinity. No signs of distress were evident.
- Local soil in the vicinity of the sludge pits presents as bentonitic clays and silts. Similar soil strata from a neighboring SWMU exhibited a hydraulic conductivity of less than 10^{-7} cm/sec.

5.0 DATA REVIEW

Soil samples from within the sludge pits area were collected and analyzed during the initial site investigation and subsequent re-sampling at greater depth.

In 1990, the initial site investigation collected samples at eight locations and multiple depths; including surface, 3, 6, 9, and 12.5 feet below ground surface. VOCs were detected in 7 of 27 samples; of which, xylenes at 540 mg/kg represented the highest detection. SVOCs were detected in 10 of 27 samples; of which, methylnaphthalene at 1,400 mg/kg represented the highest detection.

In 1995, a second round of sampling and analysis was conducted at eight locations and depths of 19 and 25 feet below ground surface. No VOCs were detected in any sample. Trace SVOCs were detected in four samples; of which, di-n-butyl phthalate at 13 mg/kg represents the highest detection.

State of New Mexico corrective action levels for BTEX in soil is 50 mg/kg total and 10 mg/kg of benzene. Seven of 43 samples indicated BTEX constituents, the highest of which was over 900 mg/kg total; which is above the 50 mg/kg action level.

All samples detected trace metals; of which, chromium and lead were detected at levels above ambient background concentration.

6.0 ASSESSMENT

Based on the site inspection and data review, the sludge pits area is assessed as follows.

- Oily waste originally placed in the sludge pits has been substantially removed and the pits now contain a mixture of residual waste and backfilled clean soil.
- Residual organic contaminants, consisting of both VOCs and SVOCs, are present in moderate concentrations and substantially confined to a 20 foot soil layer beneath the surface cover.
- Residual metal contaminants, consisting primarily of chromium and lead, are present in the same soil layer at elevated levels.
- The currently approved CAP recommends excavation and tilling to enhance biodegradation of organics. This technique will expose soil metals to oxidation and precipitation; thereby mobilizing these contaminants and promoting migration.
- Local soil underlying this site has a very low hydraulic conductivity which effectively inhibits outward migration of contaminants.
- An alternative corrective action is recommended. Installation of an engineered soil cap represents a preferred and appropriate remedy for this site.

7.0 PROFESSIONAL ENGINEER'S CERTIFICATION

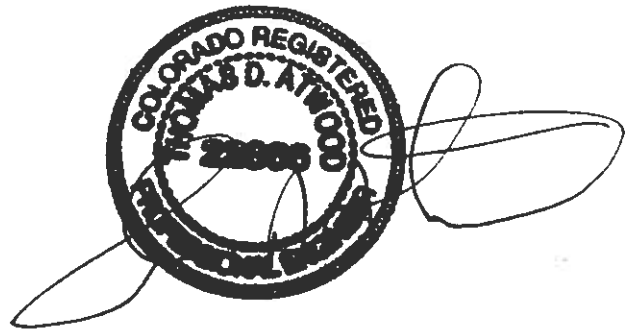
This summary report for SWMU #10 has been prepared under the direct supervision and control of a Registered Professional Engineer.

Client: Ciniza Refinery
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

Job No.: 98-205-03

Date: April 23, 1998

Prepared and Certified by:



Thomas D. Atwood, P.E.
Colorado Registration No. 22866

Appendix C

1990 and 1994 Boring Logs

RFI 1001

Personnel: Mark, Chris, Corrie, Danny, Mike, Claud*, (Jeff, Jay) PRC

Weather: Clear
No Wind
Temp 73°

Terrain: A few scattered weeds less than a foot high. The sample was collected on level ground near an overflow pipe outlet from a 4-5' high bank.

Sampling: 06-28-90
Background PID 4.0
7:16 took first sample 0- $\frac{1}{2}$ ' and split it with EPA as a duplicate. PID 4.0. The soil was brown, dry and granular.
7:21 Started augering down to 3-3 $\frac{1}{2}$ '
7:30 took sample at 3-3 $\frac{1}{2}$ ' PID 5.0 we took our sample, the soil was brown and very moist.
7:39 filled the hole.

Sampling Method:

The first sample was taken with the closed split spoon auger. The open end split spoon auger was used to auger down to the 3-3 $\frac{1}{2}$ ' interval. The second sample was then taken with the closed split spoon auger.

RFI 1002

Personnel: Mark, Chris, Danny, Mike*, Jeff, Jay

Weather: Clear
Wind 0-5 mph
Temperature 87

Terrain: A few scattered bushes about a foot in height on level ground

Sampling: 6-28-90
Background 1.0
11:50 took top sample at 0- $\frac{1}{2}$ ', the soil was dry and brown. PID 1.0
11:58 took second sample 3-3 $\frac{1}{2}$ ', the soil was brown with traces of black lines. PID 5.0
12:03 took third sample 6-6 $\frac{1}{2}$ ', the soil is dark brown and a little moist. PID 3.0
12:13 took fourth sample 9-9 $\frac{1}{2}$ ', the soil is dark brown and moist. PID 1.0
12:35 took last sample at 12 $\frac{1}{2}$ -13', the soil is brown damp clay. PID 0.5

Sampling Method:

The first sample was collected in an open end auger, then the backhoe dug down to 3' where the next sample was collected with the open end auger. The backhoe proceeded down to 6' level where the third sample was collected with a closed end auger. The backhoe again dug down to the next interval 9-9 $\frac{1}{2}$ ' and the sample was collected with the closed end auger. The backhoe dug down to 12' and the open end auger was used to go down 6 more inches, here the closed auger was used to collect the 12 $\frac{1}{2}$ -13' sample.

Unusual Incidents:

At about 4 $\frac{1}{2}$ ' there was a 4-6" wide darker brown, almost black layer.

RFI 1003

Personnel: Mark, Chris, Corrie, Danny, Claud*, Mike, (Jeff, Jay) with PRC

Weather: Clear
No Wind
Temperature 73

Terrain: A few scattered weeds about a foot in height on level ground.

Sampling: 06-28-90
Background PID 1.5
8:00 took first sample at 12½-13' interval and split it with PRC for a duplicate, and took another sample for a replicate for PRC. The soil was dark brown and a little moist. PID 1.5
8:21 took the second sample at 9-9½' interval, the soil was moist and dark brown. PID 10
8:35 took sample at 6-6½' interval, another background PID was taken at 8:30, it read 1.0 and the sample read 4.0. The soil was moist and dark brown.
8:43 took sample at 3-3½' interval, the soil was dark brown. PID 2.0
8:46 took sample at 0-½' interval, the soil was brown and dry. PID 1.0

Sampling Method:

The backhoe first dug down to 10', then we set a 4' diameter culvert, with precut holes for sampling, in the hole. The open end auger was used to auger from 10' to 12½' then the closed end auger was used to take the sample. Next we used the closed end auger to take the 9-9½' sample through one of the precut port holes. The third sample was done the same way at the 6-6½' interval, and again at 3-3½'. At 0-½' the open end auger was used to collect the sample.

RFI 1004

Personnel: Mark, Chris, Corrie, Danny, Philbert, Claud*, Mike,
(Jeff, Jay) with PRC.

Weather: Clear
No Wind
Temperature 75°

Terrain: A few scattered small bushes about a foot high on
level ground.

Sampling: 06-28-90
Background 1.0
8:53 took sample at 0- $\frac{1}{2}$ ', the soil was brown and a little
moist. PID 1.0
9:01 took second sample at 3-3 $\frac{1}{2}$ ', the soil looked dark
like oily sludge and moist. PID 38
9:07 took sample at 6-6 $\frac{1}{2}$ ', the soil looked like dark
sticky sludge, the sample was split with PRC as
a duplicate. PID 50
9:32 took sample at 9-9 $\frac{1}{2}$ ', the soil looked like sludge
but last few inches of the sample was clearing up.
PID 150
9:45 took sample at 12 $\frac{1}{2}$ -13', the soil looked dark brown
but clean. PID 20

Sampling Method:

The first sample was taken with an open end auger,
then the backhoe dug down to 3-3 $\frac{1}{2}$ ' and the closed
end auger was used to sample. The backhoe dug down
to the next depth of 6-6 $\frac{1}{2}$ ' where the third sample
was taken with the closed end auger. Then the
backhoe dug down as far as it could to about 12',
where we augered down 6" with open end auger and
then took our sample with the closed end auger.

RFI 1005

Personnel: Corrie, Claud*, Philbert, Jeff, Jay

Weather: Clear
Wind 0-5 mph
Temperature 83

Terrain: A few scattered bushes about a foot in height on level ground.

Sampling: 06-28-90

Background PID 3.0

10:29 took 0- $\frac{1}{2}$ ' sample, the soil was dry and brown PID 3.0

10:48 took sample at 3-3 $\frac{1}{2}$ ', the soil was dark brown and little moist, another background PID was taken with a reading of 1.5 and the sample also read 1.5.

11:01 took sample at 6-6 $\frac{1}{2}$ ', the soil was like black sludge PID 42

11:15 took sample at 9-9 $\frac{1}{2}$ ', the soil was clean and brown PID 2.5

11:30 took last sample at 12 $\frac{1}{2}$ -13', the soil was clean sticky brown clay. PID 3.5

Sampling Method:

The top sample was taken with the open end auger, then the backhoe dug down 3' where another sample was taken. At the 3' level, the closed end auger was used, and we split the sample with PRC as a duplicate. The backhoe then dug down to the 6' level, black sludge was very apparent from about 5'9" to 7'10", where the sample was taken. Then the backhoe dug down to the 9' level and another sample was taken with closed end auger. On the final sample there was clean brown clay, but from about 10' to 11' was more black sludge.

Boring Location _____

LOG OF TEST BORINGS

Location CINIZA REFINERY

Elevation EXISTING

Boring Number: RFI 1013

Water Level NOT ENCOUNTERED. Date: 07/26/94

LAB #	DEPTH	BLOWS/N	MATERIAL CHARACTERISTICS (MOISTURE, CONDITION, COLOR, GRAIN SIZE, ETC.)			WM	LL	PI	CLASS.
			T	E	E				
	2.0		/ */ 0 */		C	CLAY, SANDY, SLIGHTLY GRAVELLY, DAMP, SOFT, RED BROWN			
	5.5		/ - / - /	2.5	C	CLAY, SILTY, WET, SOFT, MOTTLED BLACK			
	6.4		/ */ */		C	CLAY, SANDY (MEDIUM), WET, BROWN			
	6.8		* - * - *		C	SAND, FINE, SILTY, WET, SHARP CONTACTS			
	12.3		/ - / - /	7.5	C	CLAY, SILTY, WET, SOFT, RED BROWN, SOME DARK STAINING IN THIN VARIED SILTY LENSES			
	15.8		/ * - / * -	15	C	CLAY, SANDY (FINE), SILTY, MOIST TO WET, FIRM, RED BROWN, THIN BEDDING PLANES (< 1 CM)			
	16.6		/ - / - /		C	CLAY, SILTY, WET, FIRM, RED BROWN			
	20.0		/ s / s /		C	CLAY, SHALEY, MOIST TO WET, FISSILE, DARK RED BROWN, GREY SANDY STREAKS, MORE MASSIVE AND SANDY BELOW 18.3'			
	TOTAL DEPTH		/ s / s /	20	C				

Size & Type of Boring: 4-1/4" ID Hollow Stemmed Auger

Logged By: WHK

Boring Location _____

LOG OF TEST BORINGS

Location CINIZA REFINERY

Elevation EXISTING

Boring Number: RFI 1016

Water Level NOT ENCOUNTERED Date: 07/26/94

LAB #.	DEPTH	BLOWS/N	S A M P L E			MATERIAL CHARACTERISTICS (MOISTURE, CONDITION, COLOR, GRAINSIZE, ETC.)	WM	LL	PI	CLASS.
			T	E	E					
	3.3		/-/-/-		C	CLAY, SILTY, OCCASIONAL FINE GRAVEL, MOIST, SOFT TO FIRM, BROWN				
			/-/-/-		C					
			/-/-/-		C					
			/-/-/-		C					
			/-/-/-	2.5	C					
			/-/-/-		C					
			/-/-/-		C					
	5.8		-/-/-		C	SILT/CLAY, WET, VERY SOFT, BLACK				
			-/-/-		C					
			-/-/-	5.0	C					
			-/-/-		C					
			-/-/-		C					
	9.1		/-/-/-		C	CLAY, SILTY, WET, VERY SOFT, BLACK MOTTLING				
			/-/-/-		C					
			/-/-/-	7.5	C					
			/-/-/-		C					
			/-/-/-		C					
			/-/-/-		C					
	9.8		*/**/*		C	SAND, CLAYEY, WET, VERY LOOSE, BROWN				
			*/**/*	10	C					
			//////		C	CLAY, WET, SOFT, SOME SAND LENSES(<1 CM)				
			//////		C					
			//////		C					
			//////		C					
			//////		C					
			//////		C					
			//////		C					
			//////		C					
			//////	15	C					
			//////		C					
			//////		C					
			//////		C					
	16.9		//////		C					
			/s//s/		C	CLAY, SHALEY, MOIST, HARD, RED, SOME GREY CLAY MOTTLING, FISSILE TO BLOCKY(<1 CM)				
			/s//s/		C					
			/s//s/		C					
			/s//s/		C					
			/s//s/		C					
			/s//s/	20	C					
			/s//s/		C					
			/s//s/		C					
			/s//s/		C					
			/s//s/		C					
			/s//s/		C					
			/s//s/		C					
			/s//s/		C					
			/s//s/		C					
	25.0		/s//s/	25	C					
	TOTAL DEPTH									

Boring Location _____

LOG OF TEST BORINGS

Location CINIZA REFINERYElevation EXISTINGBoring Number: RFI 1018Water Level NOT ENCOUNTERED Date: 07/27/94

LAB #	DEPTH	BLOWS/N	MATERIAL CHARACTERISTICS (MOISTURE, CONDITION, COLOR, GRAIN SIZE, ETC.)			WM	LL	PI	CLASS.
			T	E	E				
			/-/-/-		C	CLAY, SILTY, DAMP TO MOIST, FIRM, BROWN			
			/-/-/-		C				
			/-/-/-		C				
	1.8		/-/-/-		C				
			/-/-/-	2.5	C	CLAY, SILTY, SCATTERED GRAVEL, WET, VERY SOFT,			
			/-/-/-		C	BROWN, MOTTLED BLACK			
			/-/-/-		C				
			/-/-/-		C				
			/-/-/-		C				
			/-/-/-	5.0	C				
			/-/-/-		C				
	6.2		/-/-/-		C				
			/-/-/-		C	CLAY, SILTY, WET, VERY SOFT, RED BROWN			
	7.1		/-/-/-		C				
	7.6		/-/-/-	7.5	C	CLAY, SANDY, SILTY, VERY SOFT, BROWN, SOME DRK			
			//////		C	STREAKING ON BEDDING, FREE FLUID IN BEDDING			
			//////		C	CLAY, WET, SOFT, RED BROWN, SOME BLACK MOTTLING			
	9.1		//////		C				
	9.7		*/*/*		C	SAND, CLAYEY, MOIST TO WET, LOOSE, YELLOW BROWN			
			//////	10	C	CLAY, WET, FIRM, RED BROWN			
			//////		C				
			//////		C				
			//////		C				
			//////		C				
			//////		C				
			//////		C				
			//////		C				
			//////		C				
	15.2		//////	15	C				
			/*/*/*		C	CLAY, SANDY, WATER BEARING, VERY SOFT, BROWN,			
	15.9		/*/*/*		C	SAND LAMINATIONS (<0.5 CM)			
			/s//s/		C	CLAY, SHALEY, MOIST, HARD, RED TO PURPLE BROWN			
			/s//s/		C	SOME GREY CLAY MOTTLING, FISSILE AND FINE BLOCKY			
			/s//s/		C	(<1 CM)			
			/s//s/		C				
			/s//s/		C				
			/s//s/		C				
			/s//s/		C				
			/s//s/	20	C				
			/s//s/		C				
			/s//s/		C				
			/s//s/		C				
			/s//s/		C				
			/s//s/		C	GRADES SANDIER BELOW 22.1'			
			/s//s/		C				
			/s//s/		C				
			/s//s/		C				
	25.0		/s//s/	25	C				
	TOTAL DEPTH								

Boring Location _____

LOG OF TEST BORINGS

Location CINIZA REFINERYElevation EXISTINGBoring Number: RPI 1020Water Level NOT ENCOUNTERED Date: 07/27/94

LAB #	DEPTH	BLOWS/N	S		MATERIAL CHARACTERISTICS (MOISTURE, CONDITION, COLOR, GRAINSIZE, ETC.)	WM	LL	PI	CLASS.
			T	E					
	3.0		/-/-/-/	C	CLAY, SILTY, MOIST TO WET, SOFT, BROWN				
			/-/-/-/	C					
			/-/-/-/	C					
			/-/-/-/	C					
			/-/-/-/ 2.5	C					
			/-/-/-/	C					
	6.0		/-/-/-/	C	CLAY, SILTY, WET, SOFT, BROWN				
			/-/-/-/	C	DARK SPOT AT 3.3'				
			/-/-/-/	C					
			/-/-/-/ 5.0	C					
			/-/-/-/	C					
			/-/-/-/	C					
	6.7		*/*/*/*	C	SAND, CLAYEY, WET, LOOSE, BROWN				
			//*/*	C					
			////// 7.5	C	CLAY, WET, FIRM TO STIFF, BROWN				
			//////	C					
			//////	C					
			//////	C					
			//////	C					
			////// 10	C					
			//////	C					
	11.8		//////	C					
			/**/**	C	CLAY, SANDY, WET, SOFT, BROWN				
	12.4		/**/**	C					
			//////	C	CLAY, WET, FIRM TO STIFF, BROWN				
	13.5		//////	C					
	13.9		/**/**	C	CLAY, SANDY (FINE TO MEDIUM), WET, HARD, BROWN				
			/S//S/	C	CLAY, SHALEY, HARD, BROWN TO RED BROWN, THIN				
			/S//S/ 15	C	LAMINATIONS, FISSLE AND FINE BLOCKY (<1 CM),				
			/S//S/	C	SOME GREY CLAY MOTTILING				
			/S//S/	C					
			/S//S/	C					
			/S//S/	C					
			/S//S/	C					
			/S//S/	C					
			/S//S/	C					
			/S*/S/	C	GRADES SANDIER				
			/S*/S/	C					
			/S*/S/	C					
			/S*/S/ 20	C					
			/S*/S/	C					
			/S*/S/	C					
			/S*/S/	C					
			/S*/S/	C					
			/S*/S/	C					
			/S*/S/	C					
			/S*/S/	C					
			/S*/S/	C					
	25.0		/S*/S/ 25	C					
	TOTAL DEPTH								

Boring Location _____

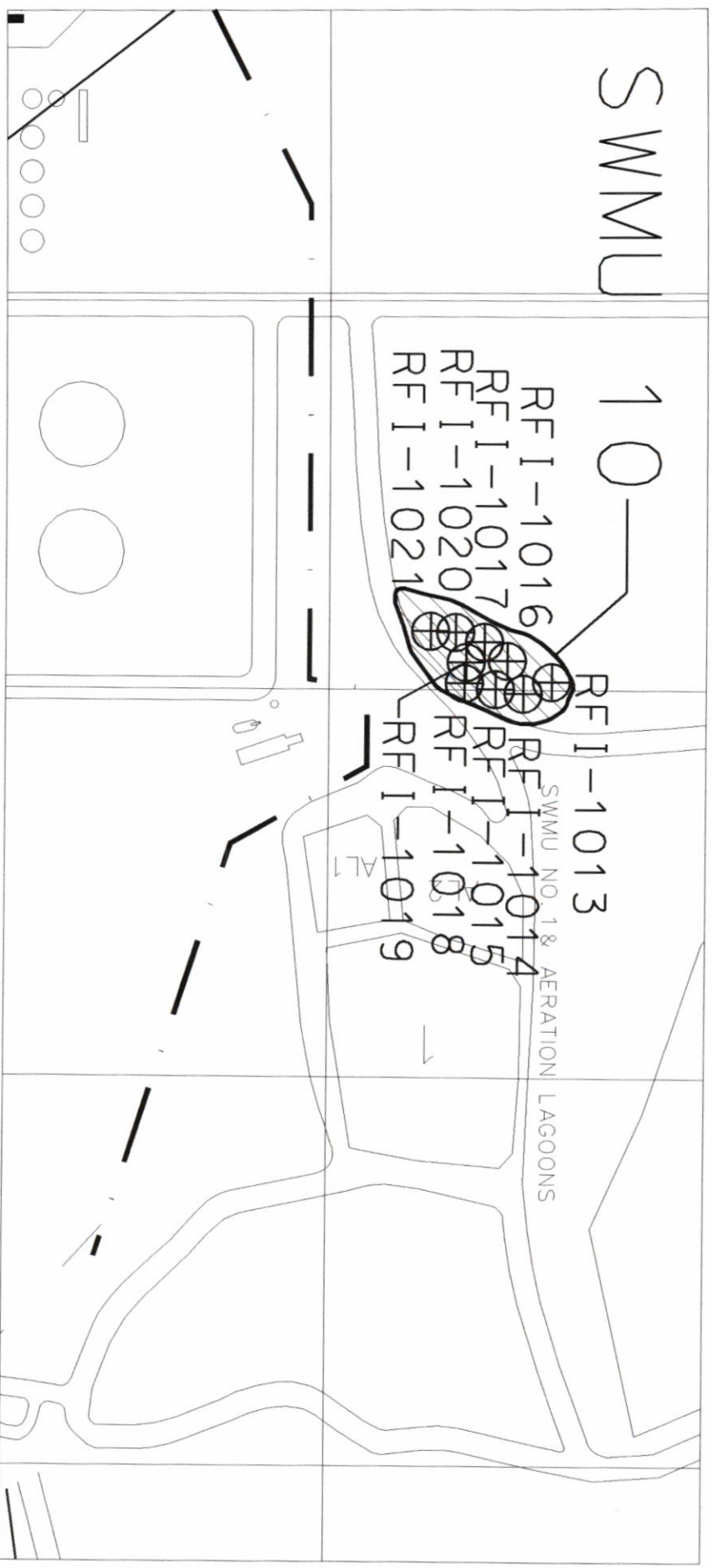
LOG OF TEST BORINGS

Location CINIZA REFINERYElevation EXISTINGBoring Number: RPI 1021Water Level NOT ENCOUNT. Date: 07/27/94

LAB #	DEPTH	BLOWS/N	MATERIAL CHARACTERISTICS (MOISTURE, CONDITION, COLOR, GRAINSIZE, ETC.)			WM	LL	PI	CLASS.
			T	E	E				
			/-*/-/		C	CLAY, SILTY, SLIGHTLY SANDY, WET, FIRM, BROWN			
	1.7		/-*/-/		C				
			/-*/-/		C				
	2.4		/-//-/		C	CLAY, SILTY, WET, SOFT, BROWN, BLACK AT 1.8 TO 1.9'			
			/-//-/	2.5	C				
			/*/*/*		C	CLAY, SANDY (APPEARS TO BE IN <0.5 CM STINGS),			
			/*/*/*		C	SOFT TO VERY SOFT, BROWN			
			/*/*/*		C				
	5.0		/*/*/*	5.0	C				
			//////		C	CLAY, WET, SOFT, BROWN			
	6.1		//////		C				
			//*		C	SAND, CLAYEY, WET (POSSIBLY WATER BEARING),			
	6.8		*/*/*		C	LOOSE, SHARP CONTACT			
			/-//-/	7.5	C	CLAY, SILTY, RARE SAND STRINGER (<0.5 CM), WET,			
			/-//-/		C	FIRM TO STIFF, RED BROWN			
			/-//-/		C				
			/-//-/		C				
			/-//-/		C				
			/-//-/	10	C				
			/-//-/		C				
			/-//-/		C				
			/-//-/		C	SAND STRINGER ~ 1" AT 11' & 13'			
			/-//-/		C				
			/-//-/		C				
			/-//-/		C				
	13.9		/-//-/		C				
			/S//S/		C	CLAY, SHALEY, HARD, RED TO RED BROWN, FISSLE			
			/S//S/	15	C	AND BLOCKY (<1 CM), SOME GREY MOTTLING, GRADES			
			/S//S/		C	SANDIER			
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/	20	C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
			/S//S/		C				
	25.0		/S//S/	25	C				
	TOTAL DEPTH								



GIANT REFINING CINIZA REFINERY SWMU 10 SLUDGE PITS



Appendix D

Investigation Derived Waste Management Plan

Investigation Derived Waste (IDW) Management Plan

All IDW will be properly characterized and disposed of in accordance with all federal, State, and local rules and regulations for storage, labeling, handling, transport, and disposal of waste. The IDW may be characterized for disposal based on the known or suspected contaminants potentially present in the waste.

A dedicated decontamination area will be setup prior to any sample collection activities. The decontamination pad will be constructed so as to capture and contain all decontamination fluids (e.g., wash water and rinse water) and foreign materials washed off the sampling equipment. The fluids will be pumped directly into suitable storage containers (e.g., labeled 55-gallon drums), which will be located at satellite accumulation areas until the fluids are disposed in the refinery wastewater treatment system upstream of the API separator. The solids captured in the decontamination pad will be shoveled into 55-gallon drums and stored at the designated satellite accumulation area pending proper waste characterization for off-site disposal.

Drill cuttings generated during installation of soil borings will be placed directly into 55-gallon drums and staged in the satellite accumulation area pending results of the waste characterization sampling. The portion of soil cores, which are not retained for analytical testing, will be placed into the same 55-gallon drums used to store the associated drill cuttings.

The solids (e.g., drill cuttings and used soil cores) will be characterized by testing to determine if there are any hazardous characteristics in accordance with 40 Code of Federal Regulations (CFR) Part 261. This includes tests for ignitability, corrosivity, reactivity, and toxicity. If the materials are not characteristically hazardous, then further testing will be performed pursuant to the requirements of the facility to which the materials will be transported. Depending upon the results of analyses for individual investigation soil samples, additional analyses may include TPH and polynuclear aromatic hydrocarbons (PAHs).