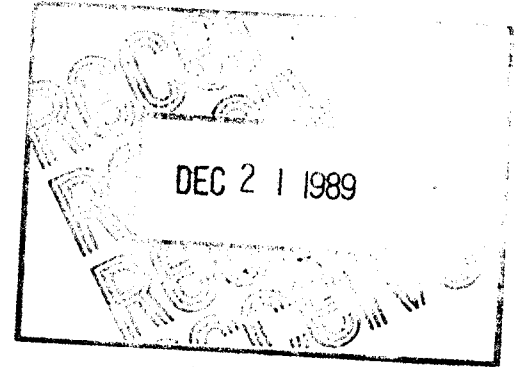


# AES

## APPLIED EARTH SCIENCES

December 15, 1989



Mr. Richard Mayer  
U. S. Environmental Protection Agency  
Mail Code GHPS  
1445 Ross Avenue  
Dallas, Texas 75202-2733

XVII

Re: Giant Refinery RFI Workplan; AES Project 5202-00

Dear Mr. Mayer:

Enclosed are four copies of the Giant Refinery RFI Workplans. Listed below are the deficiencies from the EPA letter and the sections showing the amendments.

- 1) Health and Safety (H&S) Plan - Per our telephone conversation of December 18, 1989 the H&S Plan submitted on May 31, 1989 is acceptable.
- 2) Community Relations Plan - Enclosed.
- 3) Data Management Plan - Enclosed.
- 4) Generic Sampling Plan - Enclosed.

*These documents  
plus RFI workplan  
are in megajim  
file.  
AES 02/07/90*

<u>EPA Comments</u>	<u>Giant RFI Document</u>
Page 5	Section 2.3.2
Page 14	Section 3.3.1.2
Page 17	Section 3.3.1.5
Page 19	Section 3.3.1.5.2
Page 20	Sections 3.3.1.5, 3.3.2.1, 3.3.2.2, 5.0
Page 21	Section 3.3.2.6
Page 22	Section 3.3.2.2
Page 24	Section 3.3.3.6
Page 28	Section 4.0 and Appendix C
Page 24 (1)	Section 3.4.1
(2)	Section 3.4.4
(3)	Section 3.4.5
(4)	Section 4.0
(5)	Tables 5 and 6
(6)	Section 3.4.6
(7)	Section 9.0

Waste/Source Characterization - Per our telephone conversation of December 18, 1989, the Appendix VIII analyses of the Aeration Basin sludge and liquid does not have to be conducted at this time. Instead we will analyze for 8240 and 8270.

Contamination Characterization - Soil

- 1) Soil borings depths have been changed and angle borings will be attempted. The total depth of borings at individual SWMU's will range 5 to 20 feet.
- 2) Individual maps of SWMU's have been added as has a cross-sectional view of the Aeration Basin.
- 3) Sampling intervals are included. No sample interval is larger than one foot.
- 4) A discussion of background soils is included in Section 9.0 of the Generic Sampling Plan. The existing metals data from the land treatment demonstration is proposed to be used.
- 5) See Section 9.0 of the Generic Sampling Plan.
- 6) The appropriate sections (3.4 Soil Sampling Techniques, etc). of the Generic Sampling Plan have been referenced in each individual SWMU).

Contamination Characterization (Air Media)

- 1) A larger map is included and sampling heights have been specified.
- 2) Tenax tubes are the new sampling device.
- 3) Sampling lengths are included.
- 4) The analysis has been changed.
- 5) See Section 3.6.


Contamination Characterization - Ground Water - Per the EPA letter, no ground water contamination characterization study will be conducted at this time.

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Page Three

If you have any questions, please contact me.

Sincerely,

  
David Bratberg  
Associate Hydrogeologist

cc: Mr. John Stokes - Giant Refinery  
Mr. Richard Mitzelfelt - New Mexico Environmental  
Improvement Division.

/bmw