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July 31, 2000

David Cobrain
RCRA Permits Management Program
Hazardous & Radioactive Materials Bureau
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**Ciniza Refinery, Land Treatment Unit
RCRA Post-Closure Draft Permit - Comments**

Dear Mr. Cobrain:

Enclosed, in table format, are comments for the *Ciniza Refinery RCRA Post-Closure Care Draft Permit - Land Treatment Unit*, Revision 0, May 2000. These comments are submitted under regulations adopted pursuant to Resource Conservation and Recovery Act and the Hazardous Waste Act, the New Mexico Administrative Code, Hazardous Waste Management, Title 20 Chapter 4 Part 1 NMAC 901.A.

Thank you for the opportunity to submit comments on the Draft Permit.

Sincerely,

Dorinda Mancini (Sc)

Dorinda Mancini
Environmental Manager, Ciniza Refinery

Enclosures

cc: David Pavlich, Environmental Superintendent, GRC
Mathew R. Davis, General Manager, GRC
Steve Morris, Environmental Specialist, Ciniza Refinery
Susan Collins, ThermoRetec



Ciniza Refinery - Giant Refining Company

Land Treatment Unit

Draft Post-Closure Permit

DOCUMENT REVIEW RECORD

Title: DRAFT LTU Post-Closure Care Permit EPA ID No. NMD 000333211	Doc No: 8A79-0.DOC	Rev: 0.0	Reviewer: D. Mancini
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Module	Page	Current Text and Comment	Change Requested	ACC	REJ
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GENERAL COMMENT

Title page		Change: Giant Refining Company To: Ciniza Refinery Giant Refining Company	Request text change		
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Header		Change header from: Giant Refining Company Post Closure Care Permit May 2000 To: Land Treatment Unit Ciniza Refinery-GRC Post Closure Care Permit May 2000	Request global change		
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MODULE I

I.D	2	<u>Definitions</u> Clarify or add the following definitions: "Facility" means the Ciniza Refinery site owned by the Giant Refining Company and located in... "Land Treatment Unit" means the three approximately 480-foot x 240-foot treatment cells located adjacent to the east of evaporation pond 12B.	Delete "site" Add definition of LTU		
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I.E.6	5	<u>Proper Operation and Maintenance</u> The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control and related appurtenances which are installed or used by the Permittee to achieve compliance with the conditions of the Permit. • Clarify that the LTU must be maintained such that all activities achieve compliance with the conditions of the Permit.	Delete: facilities Add: LTU such that New text reads as follows: The Permittee shall at all times properly operate and maintain the LTU such that all systems of treatment and control and related appurtenances which are installed or used by the Permittee to achieve compliance with the conditions of the Permit.		
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Module	Page	Current Text and Comment	Change Requested	ACC	REJ
MODULE II					
II.B.	9	<u>Off Site Waste</u> The Permittee shall not accept hazardous waste at the Facility from any off-site source. <ul style="list-style-type: none"> Change Facility to LTU to indicate this permit condition specific to the LTU 	Change to: The Permittee shall not accept hazardous waste at the LTU from any off-site source.		
II.F.3.b.iv	12	<u>Monitoring Records</u> <ul style="list-style-type: none"> . . .The laboratory and individuals who performed the analyses;. . . Request text change to clarify responsibilities 	Change to: <ul style="list-style-type: none"> The chain-of-custody records and the laboratory that performed the analysis 		
MODULE III					
III.D. 1.a.3	16	<u>Notices and Certification</u> . . . And, the survey plat and record of the type, location, and quantity of hazardous wastes applied to the Land Treatment Unit of the facility have been filed with the Director and McKinley County, New Mexico. . .	Change facility to Facility		
III.D.2	16	<u>Notices and Certification</u> If the Permittee wishes to move off-site any hazardous waste, hazardous waste residue, or contaminated soils, then he or she shall request a modification to this Permit... <ul style="list-style-type: none"> Hazardous waste is routinely managed, stored, labeled, and disposed of [moved] off-site as a result of normal refinery operations. Request text change 	Change to: If the Permittee wishes to move off Site any hazardous waste, hazardous waste residue, or contaminated soils from the LTU ...		
MODULE IV					
IV	Global	Change from: Chemicals of concern To: Constituents of concern <ul style="list-style-type: none"> Based on EPA Region VI RCRA Delisting Program Guidance Manual, page 29, March 21, 1996 	Request global change		

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MODULE IV (continued)					
IV.A.1.a	20	<p><u>Corrective Action for Soil</u></p> <p>The Permittee shall comply with the sampling strategy for soils, consisting of increased a sampling frequency and, if necessary, further characterization, as described in the Permit Application, Volume 1 Section E.0 and Section I.0 and Volume 2, Appendix E. The Permittee shall notify NMED if there is a statistically significant increase in chemicals constituents of concern in the soils located in the zone of incorporation (ZOI), defined as and/or the treatment zone [soils present in the LTU at depths less than five (5) feet below the ground surface (264.271(c))], and in soils below the treatment zone (BTZ):</p>	<p>Request change:</p> <ul style="list-style-type: none"> Delete: increased Add: "a" Change: chemicals to constituents Add: and/or Delete: , defined as Delete: , and in soils below the treatment zone (BTZ): <p>New text reads as follows:</p> <p>The Permittee shall comply with the sampling strategy for soils, consisting of a sampling frequency and, if necessary, further characterization, as described in the Permit Application, Volume 1 Section E.0 and Section I.0 and Volume 2, Appendix E. The Permittee shall notify NMED if there is a statistically significant increase in constituents of concern in the soils located in the zone of incorporation (ZOI) and/or the treatment zone [soils present in the LTU at depths less than five (5) feet below the ground surface (264.271(c))].</p>		
IV.A.2. a.i. (a)	21	<p><u>Groundwater Protection Standard</u></p> <p><u>Hazardous Constituents.</u> The Permittee shall monitor at the locations, frequencies, and for the hazardous constituents specified in Permit Application Volumes 1 and 2, Tables E-1A, E-1B, E-1C and E-1D. The chemicals of potential concern are included in Appendix B [the modified Skinner List (Exhibit 4, EPA Region VI RCRA Delisting Program Guidance Manual for the Petitioner, March 21, 1996)]. Annual Groundwater sampling at the site will include chemical analyses for the modified Skinner List analytes including the following the chemicals of concern:</p>	<p>Request change:</p> <p>Delete: Annual Add: Groundwater sampling...</p>		
IV.A.2. a. iv.(b)	22	<p><u>Groundwater Monitoring</u></p> <p>The Permittee shall maintain groundwater monitoring wells at the locations specified on the Site Map in Permit Application Volume 1, Section E.0, Figure I-2a and Volume 2, Appendix E, Figures 1-2 and 2-1. [20 NMAC 4.1.500 and 900 (incorporating 40 CFR §§264.97(c) and 270.14(c))]</p>	<p>Request change:</p> <ul style="list-style-type: none"> Section E to Section I 		

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Corrections to the LTU Part B Post Closure Application					
IV.A.2. a.i. (a)		<u>Concentration Limits</u> <ul style="list-style-type: none"> Part B, Volume I, Table E-1A ; liquid reporting limit for Total Xylene and Toluene incorrect. Module IV: Reporting limit established as: Total Xylene 10,000 ug/L Toluene 1000 ug/L 	Table modified and replacement page provided. Change: 620 ug/L to 10,000 ug/L Change: 750 ug/L to 1000 ug/L		
Part B Vol II App. C	3	<u>1.3 List of Wastes</u> 1.3.3 Slop Oil Emulsion Sludge (K047) <ul style="list-style-type: none"> Slop oil emulsion sludge incorrectly identified as K047 	Replacement page provided Change from K047 to: K049		

1.3 List of Wastes [20 NMAC 4.1, Subpart IX, §270.20(b)(1)]

This section, compiled from information found in Ciniza's Hazardous Waste Facility Permit, identifies the Ciniza waste streams approved for application to the LTU, their associated U.S. Environmental Protection Agency hazardous waste numbers, and their annual application limits. Table 1-1 summarizes this information.

1.3.1 Potentially Ignitable Materials (D001)

Ignitable materials applied to the LTU from 1988 to 1990, were generated by refinery operations, specifically filter clay from kerosene filters, unleaded fuels tank bottoms, and soils contaminated by petroleum product spills occurring within the refinery grounds. This waste stream did not include degreasing solvents used within the plant or waste lubricants generated by refinery equipment and vehicles.

1.3.2 Cooling Water Filter Sludge (D007)

Cooling water filter sludge was approved for LTU application, but was never applied. Cooling water filter sludge was generated from the filtration of circulated cooling water to remove solids. The solids were removed to prevent sedimentation and fouling of heat exchangers. The filtered solids were predominately dusts aspirated into the cooling tower.

1.3.3 Slop Oil Emulsion Sludge (K049)

Slop oil emulsion sludge applied to the LTU from 1987 to 1990, was generated when oil collected in the refinery American Petroleum Institute (API) separator was pumped to slop oil recovery tanks. The oil eventually fed to the Crude Unit. The water collected in the tank was drained back into the API separator. The slop tanks are cleaned of sludge approximately every five years.

1.3.4 Heat Exchanger Bundle Cleaning Sludge (K050)

Heat exchanger bundle cleaning sludge applied to the LTU from 1987 to 1990, was generated as process units were shut down for maintenance and cleaning. The units were either steam cleaned or water washed with mechanical cleaning, where needed. The cleaning water and sludges were collected in the refinery sewer system which flows to an API separator. The remaining sludge was shoveled into barrels for treatment at the LTU.

1.3.5 API Separator Sludge (K051)

API separator sludge applied to the LTU from 1987 to 1990, was generated from the cleaning of the API separators. Refinery wastewaters, including those from the cooling tower and tank farm, were serviced by the oily water sewer system. The oily water sewer system discharged to a two-parallel-bay API separator. The oil

Table E-1A. Modified Skinner List 8260 Volatile Organics and PHCs^a

Parameter	EPA Method SW-846	Description	Containers	Preservative	Holding Time/Days	Liquid Reporting ^c Limit (μ g/L)	Soil Reporting ^c Limit (mg/kg)
Benzene	8260	GC/MS	G	4°C	14	5	0.67
2-Butanone (MEK)	8260	GC/MS	G	4°C	14	1900	7000
Carbon Disulfide	8260	GC/MS	G	4°C	14	1000	350
Chlorobenzene	8260	GC/MS	G	4°C	14	39	54
Chloroform	8260	GC/MS	G	4°C	14	0.16	0.24
Chloromethane	8260	GC/MS	G	4°C	14	1.5	1.2
1,1 Dichloroethane	8260	GC/MS	G	4°C	14	25	580
1,2 Dichloroethane	8260	GC/MS	G	4°C	14	5	0.34
1,1 Dichloroethene	8260	GC/MS	G	4°C	14	5.0	0.053
trans-1,2-Dichloroethene	8260	GC/MS	G	4°C	14	100	63
1,4-Dioxane	8260	GC/MS	G	4°C	14	6.1	44
Ethylbenzene ^a	8260	GC/MS	G	4°C	14	700	230
Methylene Chloride	8260	GC/MS	G	4°C	14	4.3	8.6
Styrene	8260	GC/MS	G	4°C	14	100	1700
1,1,2,2-Tetrachloroethane ^b	8260	GC/MS	G	4°C	14	0.055	0.37
Tetrachloroethene ^b	8260	GC/MS	G	4°C	14	5	4.9
Toluene	8260	GC/MS	G	4°C	14	1000	1000
1,1,1-Trichloroethane	8260	GC/MS	G	4°C	14	60	200
Trichloroethene	8260	GC/MS	G	4°C	14	5	2.7
Total Xylene ^{a, d}	8260	GC/MS	G	4°C	14	10,000	860
Ethylene Dibromide ^b	8260	GC/MS	G	4°C	14	0.1	0.005
Acetone	8260	GC/MS	G	4°C	14	610	1500

^aPrincipal hazardous constituent identified in Ciniza Hazardous Waste Facility Permit.

^bAdditional constituents.

^cBased on EPA Region 6, Human Health Medium-Specific Screening Levels (1999) and NM WQCC Regulations (1996). Analytical detection limits are required to be lower than reporting limits.

^dRegulatory limits for individual isomers combined into a 'total' limit for these compounds.

mg/kg = milligrams per kilogram

μ g/L = microgram per liter

G = glass with Teflon-lined lid

GC/MS = gas chromatography/mass spectrometry