

GRC 2004



May 24, 2004

Wayne Price
Environmental Bureau
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505



RE: Use of Remediated Soil from the Central OCD Landfarm – GW-08

Dear Wayne:


Ciniza Refinery requests permission to use the soil currently on the Central OCD Landfarm to cover the area on the northwest corner of the site, where the temporary evaporation ponds were located, after removal of the surface soil from that area.

The surface soil from the temporary pond area has been impacted with salts by its use for holding wastewater. The salt-impacted surface soil will be removed and used as dike material to repair the dike between ponds 5 & 6.

This landfarm has been tilled and fertilized, without addition of new amounts of contaminated soil, since 1999. The TPH has dropped from ~5000 ppm to between 1200 and 1800 ppm. Please see attached spreadsheet and analytical results. There is no gasoline range TPH. This soil has shown the ability to grow native vegetation and has a significant amount of seeds, which will be beneficial in stabilizing and controlling erosion in the northwest area.

Your timely response is appreciated, since the dike work is critical, and needs to be started as soon as possible. Please contact me at 505.722.0227 if you have questions or concerns. Again, thank you for your assistance with this request.

Sincerely


Dorinda Mancini
Environmental Manager, Ciniza Refinery

Enc.

cc: Denny Foust, Aztec Office
Dave Cobrain, NMED
Ed Riege, Environmental Superintendent, Giant Refining Co.

PHONE
505-722-3833
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GALLUP
NEW MEXICO
87301

**CINIZA REFINERY
GIANT REFINING COMPANY**
Discharge Plan GW-032

**Table 1
OCD Central Landfarm
(mg/Kg)**

Date	Sample ID	TPH	Gasoline	Diesel	Oil	benzene	e-benzene	o-xylene	m/p xylene	toluene
6/18/1998	OCD - 15	3200	<100	1300	1900					
6/18/1998	OCD - 39	4700	<100	1500	3200					
6/18/1998	OCD - 93	4700	<100	1900	2800					
6/18/1998	OCD - 137	4700	<100	1800	2900					
7/8/1998	OCD-North			1700						
7/8/1998	OCD-South			3000						
11/1/1999	OCD-North	1520	<10	560	960					
11/1/1999	OCD-South	1070	<10	320	750					
8/2/2000	OCD-East	2090	<50	690	1400					
8/2/2000	OCD-West	1910	<50	610	1300					
1/4/2001	OCD LF		<10	920		<0.005	<0.005	<0.005	<0.01	<0.005
12/19/2002	OCD - 59			720	600					
12/19/2002	OCD - 63			880	680					
12/19/2002	OCD - 112			1200	980					
5/14/2004	Central - North		<5	610	570					
5/14/2004	Central - South		<5	850	990					

Table 2
OCD Central Landfarm
(mg/Kg) **Total & TCLP Metals**

Date	Sample ID	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
1/4/2001	OCD LF Soil Total	<3	303	0.5	23.8	32.3	1.66	<2.5	<1
1/30/2001	OCD - North Total	12	396	0.8	19	30	3.02	<4	<2
	TCLP	<0.1	0.7	<0.01	<0.02	<0.1	<0.01	<0.1	<0.05
1/30/2001	OCD - South Total	10	254	<0.5	17	27	0.3	<4	<2
	TCLP	<0.1	0.7	<0.01	<0.02	<0.1	<0.01	<0.1	<0.05

Table 3
NE OCD Landfarm - Below the Treatment Zone
(mg/Kg)

Date	Sample ID	TPH	Gasoline	Diesel	Oil	Volatiles (8260B)	Semi-vols (8270B)
12/7/2000	BTZ-RRR-Lag Assaigai Lab		<0.25	<25	<100	ND	ND
12/7/2000	BTZ-RRR-Lag IML		<5	<30		ND	ND

Table 4
NE OCD Landfarm - Below the Treatment Zone
(mg/Kg) **Total Metals**

Date	Sample ID	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
12/7/2000	BTZ-RRR-Lag Assaigai Lab	<3	333	0.24	9.8	9.8	0.1	<2.5	<0.5
12/7/2000	BTZ-RRR-Lag IML	0.6	326	<0.5	10	11	<0.06	<0.5	<2

Table 5
NE OCD Landfarm - Below the Treatment Zone
(mg/Kg)

Date	Sample ID	pH	Calcium	Magnesium	Potassium	Silicon	Sodium
12/7/2000	BTZ-RRR-Lag Assaigai Lab	7	19200	5160	1399	888	995

Table 6
NE OCD Landfarm - Remediated Soil
(mg/Kg)

Date	Sample ID	TPH	Gasoline	Diesel	Oil	Volatiles (8260B)	BNA
4/17/2001	Temp LTA TCLP					ND	ND
8/28/2001	Temp LTU - No.	205					
8/28/2001	Temp LTU - So.	100					
12/19/2002	RRR - 36			5600	1100		
12/19/2002	RRR - 76			3500	820		
12/19/2002	RRR - 125			2700	700		
5/13/2004	NE - North		<5	1400	910		
	NE - South		ND	1000	800		

Table 7
Railroad Rack Lagoon Sludge
(mg/Kg) **Total & TCLP Metals**

Date	Sample ID	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
12/7/2000	RRR Lagoon Sl. Assaigai-Total	<3	560	0.41	42.4	77.8	1.18	<2.5	<0.5
12/7/2000	RRR Lagoon IML-Total	0.6	300	0.5	10	10	0.21	<0.5	<1
4/17/2001	RRR Lag Summit-TCLP	<0.01	<1.0	<0.005	<0.05	<0.1	<0.002	<0.02	<0.01

Table 8
Railroad Rack Lagoon Sludge
(mg/Kg)

Date	Sample ID	TPH	Gasoline	Diesel	Oil	benzene	e-benzene	o-xylene	m/p xylene	toluene
12/7/2000	RRR Lagoon Sl. Assaigai		760	17000	7400	0.6	3.1	5.5	15	3.1
12/7/2000	RRR Lagoon IML			13,500	27000	<0.5	1	2.2	5.4	1.6

Table 9
Railroad Rack Lagoon Sludge
(mg/Kg) **TCLP Volatiles & Semi-Volatiles**

Date	Sample ID	Vols	BNA
4/17/2001	RRR Lagoon Summit	ND	ND

Ciniza Refinery
Giant Refining Company
Discharge Plan GW-032

NE OCD Landfarm Sample Grid
Length 20 Ft. by Width 7.5 Ft..

1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40
41	42	43	44	45	46	47	48	49	50
51	52	53	54	55	56	57	58	59	60
61	62	63	64	65	66	67	68	69	70
71	72	73	74	75	76	77	78	79	80
81	82	83	84	85	86	87	88	89	90
91	92	93	94	95	96	97	98	99	100
101	102	103	104	105	106	107	108	109	110
111	112	113	114	115	116	117	118	119	120
121	122	123	124	125	126	127	128	129	130
131	132	133	134	135	136	137	138	139	140
141	142	143	144	145	146	147	148	149	150

Ciniza Refinery
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Discharge Plan GW-032

CENTRAL OCD Landfarm Sample Grid
Length 22 Ft. by Width 20 Ft.

1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40
41	42	43	44	45	46	47	48	49	50
51	52	53	54	55	56	57	58	59	60
61	62	63	64	65	66	67	68	69	70
71	72	73	74	75	76	77	78	79	80
81	82	83	84	85	86	87	88	89	90
91	92	93	94	95	96	97	98	99	100
101	102	103	104	105	106	107	108	109	110
111	112	113	114	115	116	117	118	119	120
121	122	123	124	125	126	127	128	129	130
131	132	133	134	135	136	137	138	139	140
141	142	143	144	145	146	147	148	149	150