

Monzeglio, Hope, NMENV

From: Chavez, Carl J, EMNRD

Sent: Tuesday, December 20, 2005 8:59 AM

To: 'Ed Riege'; Steve Morris; Ed Rios

Cc: Price, Wayne, EMNRD; Monzeglio, Hope, NMENV; Foust, Denny, EMNRD; Powell, Richard, NMENV

Ladies and Gentlemen:

RE: Ciniza Refinery

Please find attached the OCD summary from our November 10, 2005 site visit and the stormwater inspection letter from Mr. Richard Powell of the NMED to Giant. Also attached is OCD's analytical data results from the split-sample event that day. Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

12/23/2005

SUMMARY

Ciniza Refinery EPA Stormwater Inspection & OCD Follow-up from September 8, 2005 Inspection

November 10, 2005

Attendees:

Giant Refining Company: Stephen Morris (SM), Ed Riege (ER1) and Ed Rios (ER2)
New Mexico Environment Department (NMED). Surface Water Quality Division:
Richard Powell (RP)
Oil Conservation Division: Carl Chavez (CC) and Wayne Price (WP)

Disclaimer: The following are the minutes of the meeting, and observation notes taken by OCD personnel. These comments do not release Giant of responsibility of any OCD permit condition or rule, or compliance with any other federal, state, or local laws and/or regulations. In addition, these comments are not to be construed to imply enforcement of any permit condition or regulation outside of the authority of the OCD.

Agenda:

I. NPDES Stormwater Inspection (see attached stormwater inspection letter dated December 19, 2005 to Giant from RP)
II OCD September 8, 2005 Refinery Follow-up

I. NPDES Stormwater Inspection of Giant Ciniza's Multi-Site (MS04) General Discharge Permit (NMR05B157)

RP asked for a copy of Giant's general discharge permit and Stormwater pollution prevention plan (SWPPP) with maps of existing stormwater non-contact areas. RP checked the accuracy of the maps in the field and pointed out areas that appear to be missing from the diagram(s). A field inspection was conducted with the assistance of ER and SM.

RP indicated that stormwater (non-contact) is in contact with contact water off-site; this constitutes a non-permitted discharge. Individual NPDES permits are required for contaminated stormwater discharging off-site. Giant has the option to capture or contain contaminated run-off and/or to apply for individual permits for discharge locations with effluent monitoring. If contaminated stormwater leaves the site, Giant is in violation of CWA. Parameters to sample for may include: industry standard contaminants for refinery as specified under 40 CFR 119 and WQCC standards. If concentrations are below regulatory limits, there is no violation.

The conclusions from the stormwater inspection were:

- 1) Need Endangered Species Act and Historical Society information for refinery location.

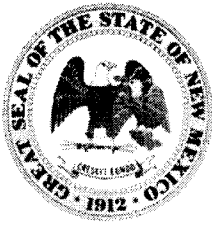
II. OCD September 8, 2005 Ciniza Refinery Follow-up

- 1) Status of installation of chopper pump at new API separator (NAPIS) that was scheduled to be installed the week of Nov. 8, 2005? Giant stated that Rinchem is scheduled to install the pump during the week of December 4, 2005.
- 2) Is the secondary containment at NAPIS holding? Some fluctuation in fluid level, but lately the level has remained constant at 1 ft. of head. Giant feels the primary and secondary containment systems have integrity. OCD is concerned about the integrity of the secondary containment system. OCD wanted to evaluate this situation further and discuss with Giant later. OCD concerns are: 1) integrity of the secondary containment system; and 2) geohydrologic connection to the water table aquifer with potential for leaking contaminants to discharge to the surface and/or migrate via groundwater beneath the refinery property.
- 3) Cleanup of shorelines around evaporation ponds? Giant is scheduled to scrape the shorelines and increase fluid level before the end of December 2005. Waste will be characterized for proper disposal and or treatment in the land farm. EPI is skimming oil off the top of the ponds today.
- 4) Status of oil in the OAPIS? Oil (i.e., TPH) and hazardous waste constituents are still being detected in weekly monitoring.
- 5) OCD Data Quality Objectives (DQOs)? Giant needs to be aware of the appropriate regulatory limits based on site sampling to ensure analytical methods and detection limits are adequate for use by the State. For example, sampling at the OAPIS, evaporation ponds, etc. would require detection limits that do not exceed 40 CFR 261.24 Toxicity Characteristic to determine whether hazardous wastes are present where they should not be. Groundwater sampling would require lower detection limits and it is Giant's responsibility to ensure that any dilutions performed by the lab will not exceed the states DQOs.
- 6) Pilot station effluent (PSE) and monitoring per OCD permit? A couple of analytical monitoring reports were provided at the meeting, which showed significantly elevated BOD levels. OCD is not sure why there were only 2 reports provided, since the permit requires quarterly monitoring? The PSE discharges directly into aeration lagoon #1 without any treatment. BOD levels from the PSE were observed to be significantly elevated. OCD requested that Giant analyze PSE for 405.1, 418.1, 6010, 7470, 8015B, 8260, 8270, 8310, etc. to get a better handle on waste loading to the existing treatment system. Giant will need to determine the volume flow rate from the PSE, refinery process water, determine hazardous constituent concentrations, and estimate loading to the current treatment system to compare with the total capacity of the current treatment system. If loading exceeds it's treatment capacity, then Giant needs to undertake actions to operate within its treatment capacity.
- 7) OCD's Nov. 15, 2005 e-mail requirement for Giant to address the OAPIS? There appears to be another point source(s) migrating into the OAPIS. Giant is working to investigate the source(s) of contamination. OCD is concerned about hazardous wastes in contact with stormwater at the OAPIS.
- 8) Rail Road Lagoon Rack excavation map displaying sample locations for verification of soil remediation? Giant is sending the map in its final report.

- 9) What caused the Tank 232 release? Why the disparity between release and recovery volumes in the C-141 forms? OCD concerns about Giant's response effort in excavating contaminated soils in unlined berm areas? Giant indicated the release occurred due to operator error. OCD mentioned that Giant should consider incorporating a zero loss or pollution prevention goal at its facility to help reinforce and prevent releases from occurring at the facility. OCD is concerned that Giant did not dig down deep enough to recover impacted soils in the unlined berm area. Giant indicated that it has never completely excavated contaminated soil in berm areas after releases occur. Giant collected waste characterization samples of the excavated soil in order to properly dispose or treat it in their land farm. Giant indicated that their general protocol for releases in berm areas is to excavate the bulk of the contamination, but they never excavate deep enough to assess impacts to groundwater. OCD acknowledged the presence of clay substrate underneath the refinery; however, it clarified that all impacted soil, regardless of release location should be properly investigated, removed, and characterized for disposal and/or land treatment. Giant acknowledged OCD's concerns.
- 10) Land farm area status? Giant tills the land farm once per month as specified in the permit.
- 11) Stockpiled soils update? Giant confirmed that cooling tower salt contaminated soil piles observed during the Sept. 8, 2005 inspection were properly disposed.
- 12) Firewater pit status? OCD has not received any information on Giant's request to use an existing facility pit filled with RO reject water for the storage of firewater. Giant indicated that the request is ongoing with permeability test results in hand, etc.
- 13) OCD split-samples with SM from the Old API Separator (OAPIS), the discharge point from Aeration Lagoon 2 to Evaporation Pond (EP) #1, and discharge point from EP #1 to EP #2. OCD is currently awaiting receipt of the analytical sample results from Hall Environmental of Albuquerque. OCD followed all chain-of-custody procedures up to and including delivery to the laboratory the next morning.
- 14) ER2 was present during OCD's agenda discussion and is the new Superintendent of Giant's Ciniza Refinery.

Attachment: NMED Stormwater letter to Giant (December 19, 2005)

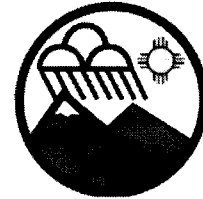
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BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau
Harold Runnels Building Room N2050
1190 St. Francis Drive - Zip 87505
P.O. Box 26110 - Zip 87502-6110
Santa Fe, New Mexico
Telephone (505) 827-0187
Fax (505) 827-0160
www.nmenv.state.nm.us



RON CURRY
SECRETARY

DERRITH WATCHMAN MOORE
DEPUTY SECRETARY

Certified Mail - Return Receipt Requested

December 19, 2005

Mr. Ed Rios, General Manager
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

RE: NPDES Storm Water Compliance Evaluation Inspection, Ciniza Refinery, NPDES #NMR05B157, November 10, 2005

Dear Mr. Rios:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by EPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, and are required per Part 4.10 of the multi-sector general storm water permit, to amend your Storm Water Pollution Prevention Plan as appropriate based on the findings of this report to incorporate additional structural and non-structural controls as needed to eliminate or significantly minimize pollutants in storm water discharges. Further, you are encouraged to notify in writing, both USEPA and NMED regarding modifications and compliance schedules.

My thanks for the help and cooperation of Messrs. Ed Riege and Steve Morris of your staff during this inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 827-2798.

Sincerely,

Richard E. Powell
Surface Water Quality Bureau

cc: Marcia Gail Bohling, USEPA (6EN-AS)
USEPA, NPDES Permits Branch (6WQ-P)
NMED, District V, Grants
Carl Chavez, EM&NRD, OCD, 1220 S. St. Francis, Santa Fe, New Mexico 87505

**NPDES Compliance Inspection
Giant Refining Company/Ciniza Refinery
NPDES Permit #NMR05B157, November 10, 2005**

Further Explanations

Introduction

On November 10, 2005, a Compliance Evaluation Inspection was conducted at the Giant Refining Company/Ciniza Refinery (petroleum refining - Standard Industrial Classification 2911) located near Gallup, New Mexico by Richard E. Powell of the State of New Mexico Environment Department (NMED). Carl Chavez and Wayne Price of the NM Energy, Minerals and Natural Resources Department, Oil Conservation Division (OCD) accompanied the inspector. The primary purpose of this inspection was to document the permittee's status regarding the NPDES multi-sector general storm water permit (MSGP) for industrial activities (this facility has industrial activities being conducted on-site that meet the descriptions of industrial activities in section I) and storm water regulations at **40 Code of Federal Regulations (CFR) Part 122.26**. In addition, this inspection included an assessment of the potential co-mingling of "contaminated runoff" as defined under 40 CFR Part 419.11 that is subject to nationally established effluent guidelines found at 40 CFR Part 419 and ineligible for coverage under the MSGP, with storm water discharges that are eligible.

Permit Status: Overall rating of "Unsatisfactory"

"Contaminated runoff" is defined as "runoff which comes into contact with any raw material, intermediate product, finished product, by-product or waste product located on petroleum refinery property." Most areas at refineries are not eligible for coverage under the MSGP including: raw material, intermediate product, by-product, final product, waste material, chemical, and material storage areas; loading and unloading areas; transmission pipelines; and, processing areas. Runoff that may be eligible for coverage, provided discharges are not co-mingled with "contaminated runoff," include: vehicle and equipment storage, maintenance and refueling areas.

A number of areas from which "contaminated runoff" or co-mingled "contaminated runoff" and storm water runoff appears to discharge were identified during this inspection. These include: a fairly large area in the northeast part of the facility where some (most is contained) of the railcar loading/unloading facility and an LPG tank farm appear to drain either directly offsite or are co-mingled with storm water runoff directed to storm water outfall No. 2; the area along the south side of the main process area (north of the office complex) appears to co-mingle with storm water runoff directed to storm water outfall No. 1; and the area along the north side of the facility where some of the drainage from a scrap yard (from which discharges are likely eligible) appears to co-mingle with drainage from an adjacent (to the east) tank farm and then directed to storm water outfall No. 2. There may be other areas where "contaminated runoff" or co-mingled "contaminated runoff" and storm water runoff discharge from this facility but the difficulty of identifying these areas is exacerbated by the facility operator's failure to identify and provide adequate drainage area mapping. The site maps included in the SWPPP show only general drainage patterns and outfalls, but lack of detailed drainage area mapping creates a situation where even the facility operators may be unaware of exactly what areas drain to "contaminated runoff" containment systems, and what

areas drain offsite or are directed to the storm water outfalls. Figure No. 1 in the SWPPP does delineate eight drainage sectors, which are described in the attached "Storm Water Assessment" narrative, but these appear to be inaccurate per the above discussion. It appears that these eight sectors were determined by merely drawing a large box around a general area rather than making an accurate determination of specific drainage areas.

Section 301 (a) of the Federal Water Pollution Control Act states that "Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful." Since this facility does not have (and has apparently never had) NPDES permit coverage for discharges of process wastewater or contaminated runoff, all past, and continuing, discharges have been (are) in apparent violation of Section 301 of the Clean Water Act, 33 U.S.C. § 1311.

Storm water runoff from this facility discharges to unclassified tributaries to the North Fork of the Rio Puerco (west) in the Little Colorado River minor Basin, Lower Colorado River major Basin. This report is based on a review of files maintained by the permittee and NMED, on-site observation by NMED personnel, and verbal information provided by the permittee's representatives.

An entrance interview was conducted with Messrs. Ed Riege, Environmental Superintendent and Steve Morris, Environmental Engineer at approximately 1025 hours on November 10, 2005. The inspector made introductions, presented his credentials and discussed the purpose of the inspection.

This facility applied for permit coverage under the NPDES multi-sector general storm water permit (MSGP) 2000 and has been assigned reference #NMR05B157 effective April 24, 2002. There was an SWPPP last revised on April 12, 2005, available for review at the site on the date of this inspection. There is no documentation included in the SWPPP, which supports the permittee's determination of permit eligibility with regard to Part 1.2.3.6 (Endangered Species) and Part 1.2.3.7 (Historic Places). There is a signed/certified statement (by Ed Rios) in the "NPDES Certifications" section of the plan regarding eligibility "... due to previous authorization under the Endangered Species Act." However, although the facility may have followed proper procedures (see MSGP Addendum A) to establish MSGP permit eligibility regarding endangered species, no documentation, other than the above statement, regarding this determination was included in the SWPPP. Information to support the permittee's determination of permit eligibility must be included in the SWPPP.

Since most of the time available to conduct this inspection was spent doing the above documented "contaminated runoff" assessment, only a cursory, and after the fact review of the SWPPP, was completed. Some of the major findings of this brief review are as follows:

Storm Water Pollution Prevention Plan (SWPPP)

Pollution Prevention Team: Overall rating of "Marginal"

Part 4.2.1 of the permit states, in part, "You must identify the staff individual(s) (by name or title) that comprise the facility's storm water Pollution Prevention Team ... Responsibilities of each staff individual on the team must be listed."

Although, Mr. Riege appears to have rather significant responsibilities regarding storm water pollution prevention and implementation of the SWPPP, the permittee's SWPPP does not identify this individual or his responsibilities.

Description of Potential Pollutant Sources: Overall rating of "Marginal"

Part 4.1.1 of the permit requires that permittees "Identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges from your facility."

The permit requires that this description include such things as a site map, an identification of the types of pollutants that are likely to be present in storm water discharges, an inventory of the types of materials handled at the site that potentially may be exposed to precipitation, a list of significant spills and leaks of toxic or hazardous pollutants, sampling data, a narrative description of the potential pollutant sources from specific activities at the facility, and identification of specific potential pollutants.

As noted above, the permittee has prepared an SWPPP for this facility. As above, the site map does not include an accurate depiction of drainage areas, all structural controls (berms, including berms associated with the truck parking and staging area; straw bale dikes; secondary containment; etc.) or receiving waters. The SWPPP must include a general location map and a site map identifying such things as: drainage areas, drainage patterns and outfalls, all structural BMPs, surface watercourses, all potential pollutant sources, locations of major spills or leaks, locations of all industrial activities exposed to precipitation, etc. The plan does a very thorough job of pollutant and pollutant source identification.

Although not specifically required (conducting analytical monitoring may be dictated for appropriate site assessment procedures, as well as documentation of SWPPP effectiveness) at these types of facilities by the MSGP 2000, benchmark analytical monitoring was required and conducted under the baseline general storm water permit as well as more limited monitoring since. Results of the September 1991, May 1997, August 2000, and August 2003 analytical monitoring indicate that the MSGP cut-off concentrations for total suspended solids (TSS) was greatly exceeded (range from 42 - 48,000 mg/L) most of the time, and results for COD (range 64 - 428 mg/L) was exceeded some of the time. These elevated analytical results (as well as the results of the quarterly visual examinations) must be taken into consideration during the facility's "Comprehensive Site Compliance Evaluation." These results must be used, in part, to determine required amendments to the SWPPP to incorporate additional structural and non-structural controls as appropriate to eliminate or significantly minimize pollutants in storm water discharges so that these pollutant levels are reduced to below cut-off concentrations. The operator has apparently taken no action to amend the SWPPP as required. However, the permittee has sampled outfalls that are located in "waters of the U.S." Because of this, these results may not be representative of actual discharges from the industrial activities at this facility. Sampling must be conducted in a location that is after the last treatment unit and prior to entry into a "water of the U.S." Also, the permittee has apparently not conducted required Quarterly Visual Monitoring (see 5.1.1 of the MSGP 2000) at this facility.

Description of Appropriate Measures and Controls: Overall rating of "Unsatisfactory"

Part 4.2.7 of the permit requires that the permittee, "Describe the type and location of existing non-structural and structural best management practices (BMPs) selected for each of the areas where industrial materials or activities are exposed to storm water," and describe appropriate proposed BMPs for areas not yet affected, and implement such controls.

Non-structural and structural BMPs to be described and implemented by the permittee include such things as good housekeeping, preventive maintenance, spill prevention and response procedures, periodic inspections, employee training, record keeping, non-storm water evaluations and certifications, sediment and erosion control, as well as implementation/maintenance of traditional storm water management practices, where appropriate.

Some of the BMPs are overly generic (e.g., "maintain in a clean and orderly work environment"). In addition, although the facility apparently does occasionally clean and repair storm water conveyances and replace straw bales dikes, the SWPPP does not include a record of regular inspections and preventive maintenance of these storm water management controls. Part 6.I.4.3.1 of the MSGP 2000 requires facility inspections at a minimum of 6-month intervals and at least quarterly inspections of equipment and vehicles that store, mix or transport chemicals/hazardous materials. It appears that these inspections are not conducted or are, at least, not recorded.

Routine facility storm water inspections must be recorded, including their scheduled frequency, personnel conducting the inspection, dates of the inspection, results of the inspection, actions taken to correct problems encountered during the inspection, etc., in the SWPPP. These inspections must include observations of all areas of the facility where industrial materials or activities are exposed to storm water, and include an evaluation of all BMPs, including sediment and erosion control measures such as silt fences, check dams, etc. These inspections must be conducted by "qualified" personnel and include a reasonable set of tracking or follow-up procedures to be used to ensure that appropriate actions are taken (deficiencies must be corrected no later than 14 days after the inspection) in response to problems documented during the inspections. As above, there are apparent problems at this facility with "contaminated runoff" control practices that the permittee has not addressed. This is the sort of problem that should be documented during the permittee's periodic inspections, and appropriate and timely corrective actions taken and documented.

Although the SWPPP includes a "Non-Storm Water Discharge Assessment Certification" that lists cooling tower mist as a source of non-storm water discharge, there is no description of results of tests/evaluations, evaluation criteria or testing methods used, dates of any testing and/or evaluation, or any other information upon which the certification decision could be based.

Annual Site Compliance Evaluation Reports: Overall rating of "Unsatisfactory"

Part 4.9 of the permit states, in part, "You must conduct facility inspections at least once a year. The inspections must be done by qualified personnel provided by you."

According to the plan, the last annual site compliance evaluation was conducted in December 2004. Ed Riege and Darren Joe, neither of whom are on the Pollution Prevention Team, conducted this evaluation. Other than the apparent failure to incorporate changes dictated by the above-mentioned

analytical sampling data, the areas evaluated, the recording of findings, follow-up, and post evaluation activities for these annual evaluations appear very thorough. However, the staff conducting the evaluations apparently failed to observe, document, and properly address the areas that appear to produce discharges of "contaminated runoff" from this facility. In addition, reports of these evaluations have not been signed and certified by a cognizant official or authorized representative per requirements in Parts 4.9.4 and 9.7.1 of the MSGP.

Per Part 4.9 of the permit, the required annual site compliance evaluation must be done by "qualified personnel that are knowledgeable and possess the skills to assess conditions at your facility that could impact storm water quality and assess the effectiveness of the BMPs ..." This inspection must include a comprehensive evaluation of the SWPPP and the entire facility, including effectiveness of current measures and controls, and identification of current and anticipated potential pollutant sources. The evaluation should include a review of the SWPPP to ascertain that all required inspections, maintenance, and good housekeeping activities are conducted and recorded, and that these activities are effective in controlling pollutant loads in storm water runoff. It should also include a review of visual and analytical monitoring results, and result in appropriate revisions to the SWPPP that describe, and provide for, implementation of any required changes/additions in a timely manner.

Based on this inspection, the operator(s) must prepare, and include with the SWPPP, a properly signed report (and reports documenting any follow-up actions taken) signed by a cognizant official or an authorized representative (see Part 9.7 of the permit) which summarizes the scope of the inspection, includes the name(s) and qualifications of personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the SWPPP, and any incidents of non-compliance (or a certification that the facility is in compliance with the SWPPP and the permit).

An exit interview to discuss the preliminary findings of this inspection was conducted from approximately 1515-1550 hours on November 10, 2005 with Mr. Ed Rios, General Manager, Mr. Stan Fisher, Operations Manager, and Messrs. Riege and Morris all of Ciniza Refinery, as well as Messrs. Chavez and Price of OCD, at the site.



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M R 0 5 B 1 5 7 11 12 0 5 1 1 1 0 17 18 W 19 S 20 2					
Remarks					
P E T R O L E U M R E F I N E R Y S I C 2 9 1 1					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 1	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) GIANT REFINING COMPANY/CINIZA REFINERY, JAMESTOWN, NM. EAST OF GALLUP ON I 40, EXIT 39 BEHIND PILOT TRAVEL CENTER MCKINLEY COUNTY	Entry Time /Date 1025/11-10-05	Permit Effective Date 10-30-00
	Exit Time/Date 1550/11-10-05	Permit Expiration Date 10-30-05
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) *ED RIEGE, ENVIRONMENTAL SUPERINTENDENT 505-722-0217 *STEPHEN MORRIS, ENVIRONMENTAL ENGINEER 505-722-3833	Other Facility Data LAT 35 29 10.9 LONG -108 25 36.3	
Name, Address of Responsible Official/Title/Phone and Fax Number *ED RIOS, GENERAL MANAGER, CINIZA REFINERY, ROUTE 3 BOX 7, GALLUP, NM 87301 505-722-0202	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	U	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- FACILITY HAS COVERAGE UNDER THE MSGP 2000 (UNDER CINIZA REFINERY, JAMESTOWN, NM) AND HAS PREPARED A SWPPP.
- THIS INSPECTION INCLUDED AN ASSESSMENT OF THE POTENTIAL CO-MINGLING OF "CONTAMINATED RUNOFF" AS DEFINED UNDER 40 CFR PART 419.11 THAT IS SUBJECT TO NATIONALLY ESTABLISHED EFFLUENT GUIDELINES FOUND AT 40 CFR PART 419 AND INELIGIBLE FOR COVERAGE UNDER THE MSGP, WITH STORM WATER DISCHARGES THAT ARE ELIGIBLE. A NUMBER OF AREAS FROM WHICH "CONTAMINATED RUNOFF" OR CO-MINGLED "CONTAMINATED RUNOFF" AND STORM WATER RUNOFF APPEARS TO DISCHARGE WERE IDENTIFIED DURING THIS INSPECTION.
- "PETROLEUM REFINERY OF MODERATE COMPLEXITY RATING" WITH CATALYTIC CRACKING CAPABILITY, REFORMING, AND TOPPING (BASIC DISTILLATION).
- SEE REPORT AND FURTHER EXPLANATION.

RICHARD E. POWELL	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2798	Date
Signature of Management QA Reviewer <i>Sandy Tom</i>	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-222-9560	Date