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ENVIRONMENT DEPARTMENT



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 23, 2007

Mr. Ed Riege
Environmental Superintendent
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

**RE: WORK PLAN FOR MONITROING WELL INSTALLATION AROUND THE
NEWAPI SEPARATOR; HWB-GRCC-07-001
GIANT REFINING COMPANY, CINIZA REFINERY
NMED ID # NMD000333211**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) has received Giant Refining Company, Ciniza Refinery's (Permittee) *Work Plan for Monitoring Well Installation* (Work Plan) at the New API Separator (NAPIS), dated March 13, 2007. The purpose of the monitoring well installations is to evaluate for the presence of contaminants at the NAPIS. Other correspondence addressing potential leaks from the NAPIS and the monitoring well installations consist of an e-mail message dated, November 16, 2006 titled *Giant Ciniza Refinery Leaky NAPIS Unit & Secondary Containment Problems* and a letter from the Permittee to NMED dated December 29, 2006 titled *Plan for Correction of Leakage from the New API Separator*.

The Work Plan addresses the installation of three monitoring wells. Two monitoring wells will be installed downgradient (west) of the NAPIS and one monitoring well will be installed upgradient (east) of the NAPIS. The monitoring well to be installed upgradient (east) of the NAPIS will be located within approximately 20 feet of the secondary containment system (SCS). This well must be logged and sampled continuously. The boring log information will be used to place the location of the screened interval of the monitoring well in the uppermost water-bearing

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zone that is anticipated to intersect the base of the NAPIS. One of the wells must be constructed so that the screened interval corresponds to that of the well located to the east (upgradient) side of the NAPIS to evaluate for releases from the NAPIS. The other well must be constructed so that the screened interval intersects the confining layer located directly below the uppermost water bearing zone to evaluate for the downward migration of groundwater.

The Permittee must perform the following during the installation of the monitoring wells.

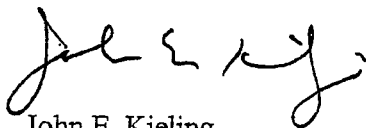
- 1) The Permittee must collect soil samples during the installation of all three monitoring wells. The Permittee must collect soil samples from the water table, from the base of each bore hole, from the confining layer in the deepest boring and from any soils containing visual contamination. The samples must be sent to a laboratory for analysis for benzene, toluene, ethylbenzene, xylenes (BTEX), and methyl tertiary butyl ether (MTBE) using EPA Method 8021B and gasoline and diesel range organics extended (GRO and DRO) using EPA Method 8015B.
- 2) Once the monitoring wells are installed, the Permittee must complete the following:
 - a. The wells must be surveyed. The newly installed well elevations must be tied into the existing monitoring well elevations already surveyed at the refinery. Horizontal positions shall be measured to the nearest 0.1-ft, and vertical elevations shall be measured to the nearest 0.01-ft.
 - b. Develop the wells within 10 days of installation if water is present. Within one week of the completion of well development, the wells must be sampled. Depth to water (DTW) and depth to product (DTP) (if detected) measurements shall be collected. Each well must be purged prior to sampling to ensure formation water is being sampled. The groundwater samples must be submitted to the laboratory and analyzed for BTEX and MTBE using EPA Method 8021B and GRO and DRO extended using EPA Method 8015B.
 - c. Check monitoring wells GWM-2, and GWM-3 for the presence of fluids. GWM-1 must also be checked for fluids. If fluids are present, a DTW/DPT measurements must be recorded.
- 3) The Permittee must submit a summary report that describes all the well installation and monitoring activities. This must also include all monitoring and sampling methods and procedures used. The report must contain the following:
 - a. All well construction details and boring logs.

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- b. A map identifying the locations of the newly installed monitoring wells relative to the Aeration Lagoons, Evaporation Pond 1, the Old API separator, and wells GWM-1 through GWM-3. The monitoring wells must be surveyed.
- c. Sampling methods and procedures.
- d. All laboratory analytical reports and summary tables.

The Permittee must install all three monitoring wells and submit a drilling report summarizing the monitoring well installations and sampling activities to NMED and the Oil Conservation Division (OCD) within 120 days of receipt of this letter. The Permittee must notify NMED one week prior to the start of installation of the monitoring wells. If you have any questions regarding this letter please call Hope Monzeglio of my staff at (505) 476-6045.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

JEK:hm

cc: D. Cobrain, NMED HWB
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