

Monzeglio, Hope, NMENV

From: Chavez, Carl J, EMNRD
Sent: Wednesday, January 16, 2008 2:40 PM
To: Jim Lieb; Ed Riege
Cc: Monzeglio, Hope, NMENV; Cobrain, Dave, NMENV; Frischkorn, Cheryl, NMENV; Price, Wayne, EMNRD; Powell, Brandon, EMNRD
Subject: Giant Ciniza Refinery (GW-32) Conceptual Design Report Storm Drain System Extension Report (October 2007)

Mr. Lieb:

The New Mexico Oil Conservation Division (OCD) and New Mexico Environment Department have review the above subject report. It appears that the maximum treatment capacity of the NAPIS is 300 gpm. The estimated storage tank and operational flow volumes appear to be accurate and the design appears to be feasible. The agencies presume that the recently installed flow meters will be monitored to account for total flow volumes over time across the process areas and overall treatment system. The agency comments, questions, and recommendations based on the report are provided below.

Agency comments, questions, and recommendations based on the report are:

- 1) There is no mention or schematic of a pipeline cleanout system especially for the smaller diameter return line to the NAPIS from the storage tanks. We cannot assume that Giant will be capable of achieving maximum flow efficiency over time with hardness, scaling problems, blockage, etc. that may occur within the pipeline over time. Giant shall design the pipeline(s) to allow for cleanout to ensure maximum flow rates can be maintained for the treatment system. A pipeline cleanout schedule should be incorporated into the Refinery's O&M Plan. Please confirm that the pipeline will allow for cleanout as necessary to maintain flow rates.
- 2) There is no mention of insulation for the pipelines to ensure they will not freeze up and disrupt flow during the Winter. Please confirm that this will be addressed.
- 3) It would appear that most if not all flow (spills, leaks & any storm water) in the process areas will be routed to the NAPIS through process drains. Since Giant will place cups around the storm water drains to eliminate or minimize flow to the storage tanks, how much flow does Giant expect will flow to the storage tanks during normal operations? How tall are the cups? It would appear that storm water drain flow to the storage tanks would occur only during high precipitation events, emergencies, and when max. NAPIS flow rates are exceeded?
- 4) Page 14, Figure 3: There appear to be some locations that are not contributing to flow within the process areas. Does Figure 3 account for all man-made drainage within the process areas? If not, please explain why they are not accounted for in the flow estimations table. The agencies want to make sure all drainage is addressed within the process areas.
- 5) Do we need anymore flow meters to monitor individual or total flow volume(s) from the process area(s)?
- 6) How will liquids be discharged from the storage tanks when they are at capacity? The agencies observe that fluids from the process areas will be mixed with refinery chemicals that will flow into the storm water drains located within the process areas. Consequently, the agencies regard liquids stored in the storage tanks to be process water unless fluids within the storage tanks are tested and shown to meet WQCC WQSs before discharge into ponds, etc. Giant needs to address how fluids will be discharged from the storage tanks in the event of an emergency, over fill, etc. A contingency plan for discharging liquids into any ponds from the storage tanks seems in order; and
- 7) Since the agencies consider the liquids in the storage tanks to be process water, how will giant construct the secondary containment system (berms, liner, containment volume of one and one-third the volume of the largest tank volume or total volume of interconnected tanks) around and under the storage tanks?

Please respond to the above comments and contact me if you have questions or wish to arrange for a telephone conference call to discuss the above items. Thank you.

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(Pollution Prevention Guidance is under "Publications")

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