DEC 2 2 1994

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. John J. Stokes, Manager
Giant Refining Company
Route 3, Box 7
Gallup, NM 87301

RE: RCRA Facility Investigation (RFI) Additional Sampling Report, Giant Refining Co. - NMD000333211

Dear Mr. Stokes:

The Environmental Protection Agency (EPA) has completed a technical review of Giant Refining's RFI report, dated October 1, 1994, and has determined that the report is deficient. Enclosed is a list of deficiencies for your review.

A revised Report addressing the enclosed deficiencies must be submitted to EPA by February 10, 1995. If this revised report is not approved, then EPA may make further modifications as required. The modified report then becomes the approved RFI report.

If you should have any questions or need additional information, please feel free to contact Mr. Rich Mayer of my staff at (214) 665-7442.

Sincerely yours,

William K. Honker, P.E., Chief
RCRA Permits Branch

Enclosure

cc: Mr. Benito Garcia
New Mexico Environment Department

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DEFICIENCY COMMENTS ON GIANT'S RFI ADDITIONAL SAMPLING REPORT FOR SWMUs' 4, 5, 6, 10 AND 11

General Comment: Giant needs to justify in a revised report why the detection limits for the volatile and semivolatile soil analysis (8240/8260) for each SWMU were relatively high. For example, the PQL for benzene for a low contaminated sample should be 5 ug/kg, Giant's detection limit was 500 ug/kg; likewise, the PQL for chrysene in a low contaminated sample should be 300 ug/kg, Giant's detection limit was 5,000 ug/kg.

General Comment: Please include in a revised report the original data package from the sampling event and the QA/QC discussion/analysis on this data package.

General Comment: EPA is requiring that Giant use the boring log/description format attached in the January 7, 1994, RFI Phase I and II approval letter for all future borings required by EPA. Each boring log must indicate whether or not there is visual contamination in each interval; whether or not there is olfactory contamination in each interval; and, include the PID reading for each interval. In addition, Giant should carry an extra PID instrument when conducting the RFI investigations.

SWMU #5, Landfill Areas

Field Notes/Analytical Results: Please explain in a revised RFI report why the PID reading for sample number 0513 at 16 feet was 230 ppm, but the analytical results for the soil sample was non-detect?

SWMU #6, Tank Farm

Page 4.5; Results: EPA's interpretation of the soil boring results indicate that there is BTEX contamination in the most vertical interval taken at each tank boring. Therefore, the full extent of contamination has not been determined at each tank.

SWMU #11, Secondary Oil Skimmer

Field Notes from Coring 1104: Please clarify in the revised RFI Report whether the discolored clay/sand at 6 feet is from hydrocarbon contamination or just the natural soil color.

Field Notes from Coring 1103: Please clarify in the revised RFI Report whether the black "fill" sand at 5 feet is from hydrocarbon contamination or just the natural soil color.