UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

RECEIVED
JAN 12 1994
GIANT REFINING CO.
CINIZA REFINERY

JAN 07 1994

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

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

RE: RFI Phase I and Phase II Supplemental Reports and Voluntary Corrective Action Plan
Giant Refining Co.
NMD000333211

Dear Mr. Stokes:

The Environmental Protection Agency (EPA) hereby approves your RCRA Facility Investigation (RFI) Phase I Supplemental Report, dated October 21, 1991, with the enclosed list of modifications. Your Corrective Action Plans (CAPs) for the Sludge Pits and the Railroad Rack Lagoon, submitted in November and December, 1992, respectfully, are also approved with the enclosed list of modifications.

The EPA is requiring that additional monitoring be completed at several sites. An annual report detailing the monitoring results shall be submitted to the EPA by December 31, 1994, and each year thereafter. The EPA is also requiring that additional soil sampling be completed at the Sludge Pits and the Tank Farm. Sampling results shall be submitted to the EPA by October 1, 1994. Further information concerning the additional monitoring and sampling requirements may be found in the attached list of modifications.

If you have any further questions or need additional information, please contact Nancy Morlock at (214) 655-6650 or Richard Mayer at (214) 655-7442.

Sincerely yours,

Allyn M. Davis

Allyn M. Davis, Director
Hazardous Waste Management Division (6H)

Enclosure

cc: Kathleen Sisneros, NMED

Printed on Recycled Paper

APPROVAL WITH MODIFICATIONS
RFI PHASE I SUPPLEMENTARY REPORT
RFI PHASE II REPORT AND THE
VOLUNTARY CORRECTIVE ACTION PLANS

The Environmental Protection Agency (EPA) has completed a technical review of Giant Refining's RCRA Facility Investigation (RFI) Phase I Supplementary Report; RFI Phase II Report; and voluntary Corrective Action Plan (CAP) for the Sludge Pits and Railroad Rack Lagoon. The subject reports are hereby approved with the following comments and modifications.

GENERAL COMMENTS

SWMU 1, The Aeration Basin; SWMU 2, The Evaporation Pond; and SWMU 13, The Drainage Ditch

The EPA agrees with the finding of no further action for Solid Waste Management Units (SWMUs) 1, 2 and 13. The EPA is, however, requiring periodic monitoring of these SWMUs (see below under Modifications). However, this approval is contingent upon the completion of a survey plat for these SWMUs. The survey plats shall be completed in accordance with the requirements set forth in 40 CFR 264.116. Giant shall submit copies of the completed survey plats to the EPA for review and approval. Upon approval, Giant may submit a Class III permit modification to terminate the RFI/Corrective Measures Study (CMS) process for these SWMUs.

SWMU 6, The Tank Farm

The EPA disagrees with Giant on their recommendation of no further action. Sampling results indicate that 9 of the 13 samples taken at the 11 foot interval (the deepest interval sampled) contained elevated levels of BTEX constituents. One sample at the 16 foot interval also contained elevated BTEX levels. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications).

SWMU 8, The Railroad Rack Lagoon, Overflow Ditch and Fan Out Area

The EPA agrees with the finding of no further action for this SWMU. The EPA understands that Giant has elected to perform voluntary corrective measures at this unit which will include bioremediation of the wastes with periodic soil and waste monitoring. Giant's voluntary bioremediation should reduce the volume and toxicity of the wastes while continuing to periodically monitor the SWMU. The EPA will, however, require that additional monitoring be completed (see below under Modifications). The EPA is also requiring that a survey plat be completed for this SWMU. The survey plat shall be completed in accordance with the requirements set forth in 40 CFR 264.116. Giant shall submit a copy of the completed survey plat to the EPA for review and approval. Upon approval, Giant may submit a Class III permit modification to terminate the RFI/Corrective Measures Study (CMS) process for this SWMU.

SWMU 9, The Sludge Pits
The EPA is unable to approve Giant's finding of no further action for this SWMU. Two (2) soil samples collected at the 15 foot interval (the deepest interval sampled) contained semivolatile contaminants. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications). Giant may begin the voluntary bioremediation (see SWMU #8 voluntary corrective action) under the CAP after the deeper soil samples have been completed.

MODIFICATIONS

SWMU 1, The Aeration Basin
Giant shall take soil samples around the Aeration Basin every two (2) years beginning in calendar year 1994. Sampling requirements shall be identical to those performed during the previous RFI, except that all soil borings shall be angled and an additional sample shall be collected at the 20-21 foot interval. Results shall be included in the appropriate Annual Monitoring Report (1994, 1996, etc.).

SWMU 6, The Tank Farm
Giant shall complete additional soil borings as close as possible to the following sample points (numbers correspond to previous RFI sampling points completed in May, 1991): 21, 22, 23, 25, 26, 27, 30, and 31. The sampling interval shall be at 16 feet, with the exception of sample point 31 which shall be sampled at 20 feet. Samples shall be analyzed for BTEX constituents. Sampling must extend vertically until no subsequent increase in contamination levels is likely to occur. A minimum of two (2) "clean" samples are required to verify delineation. The results of this sampling event shall be submitted to EPA by October 1, 1994.

SWMU 2, Evaporation Ponds
Giant shall monitor the seven (7) groundwater wells around the evaporation ponds biannually for the same constituents monitored for in the original RFI. Results shall be included in the Annual Monitoring Report.

SWMU 13, Drainage Ditch between APIs Evaporation Ponds and Neutralization Tank Evaporation Ponds
Giant shall conduct soil sampling around the Drainage Ditch every two (2) years, with sampling beginning in calendar year 1994. Sampling procedures and analytical constituents shall be identical to those required in the RFI, except that all soil borings shall be angled and an additional interval shall be sampled at from 6.0-6.5 feet. Results shall be included in the appropriate Annual Monitoring Report (1994, 1996, etc.).

SWMU 6, The Railroad Rack Lagoon
Giant shall take 5 soil borings within the lagoon after it has ceased receiving wastes. Three (3) of the five (5) borings must be sampled at the 0-1 foot interval. All borings must be sampled at the 5-6 foot interval, the 10-11 foot interval, and the 14-15 foot interval. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Sampling results shall be included in the 1994 Annual Monitoring Report.

Additionally, all six (6) borings required under the CAP closure (Section 5.0) must be sampled at the 5-6, 10-11, and 14-15 foot interval. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Sampling results shall be included in the appropriate Annual Monitoring Report.

Monitoring requirements under the voluntary CAP shall be submitted to EPA in the appropriate quarterly progress report. Giant shall notify the EPA when final closure of the Railroad Rack Lagoon has been initiated.

Continuation of SWMU 6, The Overflow Ditch
Giant shall complete three (3) soil borings in the Overflow Ditch after closing the Railroad Rack Lagoon. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Soil samples shall be collected at the 3.0 - 4.0 and 6.5 - 7.0 foot interval. All results shall be included in the 1994 Annual Monitoring Report.

Continuation of SWMU 6, The Fan Out Area
Giant shall complete four (4) soil borings in the Fan Out Area after closure of the Railroad Rack Lagoon has been completed. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Soil samples shall be collected at the 3.0 - 4.0 and 6.5 - 7.0 foot interval. Results shall be included in the 1994 Annual Monitoring Report.

SWMU #12, Contact Waste Water Collection System (CWWCS)
Giant shall perform an inspection of the CWWCS every five years beginning in calendar year 1996. The inspection shall be identical to the one performed in the previous RFI. If better technological equipment is developed, Giant may request that an alternative method be used. Results shall be included in the appropriate Annual Monitoring Report.

SWMU 9, The Sludge Pits
Giant shall complete soil borings as close as possible to sampling points 6 and 7 (numbers correspond to previous RFI sampling points, completed in May, 1991). Sampling intervals shall be at 18.0 -19.0 foot and 24.0 - 25.0 foot. Sampling procedures and analytical constituents shall be identical to those required in the previous

RFI. Sampling must extend vertically until no subsequent increase in contamination levels is likely to occur. A minimum of two (2) "clean" samples are required to verify delineation. The results of this sampling event shall be submitted to the EPA by October 1, 1994.

Before final closure of the West Pit under the CAP, all soil borings shall be sampled at the 18.0 - 19.0 and 24.0 - 25.0 foot intervals. Sampling procedures and analytical constituents shall be identical to those required in the previous RFI. Four (4) soil borings shall also be completed (before closure) in the East Pit using the same requirements specified for the West Pit borings. Results shall be included in the appropriate Annual Monitoring Report.

Monitoring requirements under the voluntary CAP shall be submitted to EPA in the appropriate quarterly progress report. Giant shall notify the EPA when final closure of the Sludge Pits has been initiated.

Soil Boring Logs: The EPA has included an example of a soil boring log to be used for all future borings.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JAN 7 1994

RECEIVED
JAN 12 1994
GIANT REFINING CO.
CINIZA REFINERY

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

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

RE: RCRA Facility Investigation (RFI) Phase III Report and Voluntary Corrective Action Plan
Giant Refining Co.
NMD000333211

Dear Mr. Stokes:

The Environmental Protection Agency (EPA) hereby approves your RCRA Facility Investigation Phase III Report dated November 3, 1992, with the enclosed modifications. The EPA is requiring that additional soil sampling be completed at several sites, including the Landfill Areas, the Old Burn Pit, the Secondary Skimmer, and the Fire Training Area. A supplementary report detailing the results of these sampling activities shall be submitted to the EPA by December 31, 1994.

Additionally, the EPA is approving the voluntary Corrective Action Plan for the Landfill Areas, submitted in March, 1993.

If you have any further questions or need additional information, please contact Nancy Morlock at (214) 655-6650 or Richard Mayer at (214) 655-7442.

Sincerely yours,

Jack Dinta

for Allyn M. Davis, Director
Hazardous Waste Management Division (6H)

Enclosure

cc: Kathleen Sisneros, NMED

Printed on Recycled Paper

APPROVAL WITH MODIFICATIONS
GIANT REFINING COMPANY
RCRA FACILITY INVESTIGATION PHASE III REPORT
AND THE
CORRECTIVE ACTION PLAN FOR THE LANDFILL AREAS

The Environmental Protection Agency (EPA) has completed a technical review of your RCRA Facility Investigation (RFI) Phase III Report, dated October, 1992, and your voluntary Corrective Action Plan for the Landfill Area, dated February, 1993. The subject reports are hereby approved with the following comments and modifications.

GENERAL COMMENTS

SWMU 5, The Empty Container Storage Area
The EPA hereby approves the finding of No Further Action (NFA) for Solid Waste Management Unit (SWMU) number three (3), the Empty Container Storage Area. However, this approval is contingent upon the completion of a survey plat for the unit. The survey plat shall be completed in accordance with the procedures outlined in 40 CFR 264.116. Giant shall submit a copy of the survey plat to the EPA for review and approval. Upon approval, Giant may submit a Class III permit modification to terminate the RFI/Corrective Measures Study (CMS) process for the Empty Container Storage Area.

SWMU 8, The Old Burn Pit
Due to the presence of elevated levels of volatile and semivolatile contaminants in soil samples from this unit, the EPA is unable to approve Giant's finding of No Further Action. All three (3) soil samples taken at the 4.5 foot interval (the deepest interval sampled) contained elevated levels of heavy molecular weight semivolatiles. Additionally, one of the three (3) samples at the 4.5 foot interval also contained elevated BTEX levels. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications).

SWMU 11, The Secondary Oil Skimmer
Due to the presence of elevated levels of volatile and semivolatile contaminants in soil samples from this unit, the EPA is unable to approve Giant's finding of No Further Action. One of the two (2) samples taken at the 3.0 foot interval (the deepest interval sampled) contained volatile and semivolatile contaminants. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications).

SWMU 4, The Fire Training Area
Due to the presence of elevated levels of oil and grease in soil samples from this unit, the EPA is unable to approve Giant's finding of No Further Action. Two (2) of the four (4) samples

taken at the 4.5 foot interval (the deepest interval sampled) contained oil and grease above 2,000 ppm. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications).

SWMU 7, The Landfill Areas

Because soil borings completed in this unit indicate the presence of waste and metal contamination at depths up to 9.5 feet, the EPA is requiring that additional soil borings be completed at greater depths. These additional soil borings will be installed in order to:

1) Verify that saturated zones found in three (3) of the 12 deepest soil boring intervals are isolated and are not connected to the groundwater;
2) Ensure that the vertical extent of waste emplacement has been defined;
3) Confirm that the vertical extent of metal contamination has been delineated.

Following the completion of the additional soil borings in the Landfill Areas, Giant may proceed with the capping of the landfills as per their voluntary Corrective Action Plan.

MODIFICATIONS

Note: All referenced sampling points correspond to the previous RFI sampling points completed in May, 1992. Soil boring logs included in future report submittals shall follow the attached example.

SWMU #8, The Old Burn Pit

Giant shall complete soil borings as close as possible to sample points one (1), two (2) and three (3). Sampling intervals shall be at six (6) and (10) feet and must extend vertically until no subsequent increase in contaminant levels is likely to occur. A minimum of two (2) "clean" samples are required to verify delineation. Sampling procedures and analytical requirements are identical to those required in the previous RFI. The results of this sampling event shall be submitted to the EPA by December 31, 1994.

SWMU #11, The Secondary Oil Skimmer

Giant shall complete two (2) soil borings within the area occupied by the former Skimmer. All borings must be sampled at the 5-6 foot and 9-10 foot interval. Sampling shall extend vertically until no subsequent increase in contaminant levels is likely to occur. A minimum of two (2) "clean" samples are required to delineate contamination. Sampling procedures and analytical requirements are identical to those required in the previous RFI. The results of this sampling event shall be due to EPA by December 31, 1994.

SWMU #4, The Fire Training Area

Giant shall complete angled soil borings as close as possible to sample points one (1) and two (2). Sampling intervals shall be at 7 and 11 feet. Sampling must extend vertically until no subsequent increase in contaminant levels is likely to occur. A minimum of two (2) "clean" samples are required to delineate contamination. Sampling procedures shall be identical to those required in the previous RFI. Analytical constituents shall include the Skinner constituents. The results of this sampling event shall be submitted to the EPA by December 31, 1994.

SWMU #7, The Landfill Areas

Giant shall take soil borings as close as possible to sample points two (2) through seven (7), and nine (9). Sampling intervals shall be at 11 feet, 16 feet and 20 feet. Sampling must extend vertically until no subsequent increase in contaminant levels is likely to occur. A minimum of two (2) "clean" samples are required to delineate contamination. Sampling procedures shall be identical to those required in the previous RFI. Giant shall analyze all samples for metals. If volatile or semivolatile contamination is encountered when sampling, then those constituents shall be analyzed also. The results of this sampling event shall be due to EPA by December 31, 1994.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

RECEIVED
AUG 26 1994
GIANT REFINING CO.
CINIZA REFINERY

August 24, 1994

Mr. Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company
Route 3, Box 7
Gallup, NM 87301

Dear Mr. Shelton:

The Environmental Protection Agency (EPA) has reviewed your letter dated August 2, 1994, concerning additional RFI sampling requirements at solid waste management unit (SWMU) #1, the Aeration Basin; #2, the Evaporation Pond; and #13, the Drainage Ditch. In your letter, you propose to conduct soil and groundwater sampling every five years as opposed to the biennial sampling requirement detailed in the EPA's January 7, 1994 letter.

The EPA has reassessed your Phase II RFI Report and hereby approves your request to sample SWMUs 1, 2, and 13 every five years. Sampling shall begin in 1995 and reports shall be submitted to the EPA by December 31 of each sample year. As a reminder, a survey plat must be completed for SWMUs 1, 2, and 13 and submitted to the EPA for review and approval. Giant shall also initiate a Class 3 permit modification to terminate the RFI/Corrective Measures Study process for these SWMUs within three months of receipt of this letter.

Please contact Nancy R. Morlock of my staff at (214) 665-6650 if you have any questions or require additional information.

Sincerely yours,

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

cc: Ms. Kathleen Sisneros, Director
Water and Waste Management Division
New Mexico Environment Department

Printed on Recycled Paper

GIANT
REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

August 2, 1994

Allyn M. Davis
United States Environmental Protection Agency
Region VI
1445 Ross Avenue
Suite 1200
Dallas, Texas 75202-2733

Re: Additional RFI Sampling

Dear Mr. Davis:

In the letter from you dated January 7, 1994 (copy enclosed), Giant Refining Company - Ciniza (Giant) received EPA's approval of Giant's recommendation of "No Further Action" on SWMU #1, the *Aeration Basin*; SWMU #2, the *Evaporation Pond*; and SWMU #13, the *Drainage Ditch*. The agency's approval of the "No Further Action" recommendations was accompanied with several additional requirements.

The additional requirements were to repeat the sampling protocol set forth in the approved RFI Sampling Plan (May, 1990) biennially. This additional sampling is intended to monitor potential migration of hazardous constituents from these SWMUs during the duration of their active service.

Giant understands the logic of continued sampling to document potential migration but has some reservations about the frequency of sampling and the true potential for migration of hazardous constituents.

It was determined in the RFI sampling (1990-1992) that migration of hazardous constituents had not occurred in any of the previously mentioned SWMUs and that water saturation had not occurred below five feet. This observation, coupled with the fact that hazardous constituents are not released to the three SWMUs, indicates that future contamination due to migration of hazardous constituents is virtually impossible.

Based on this knowledge, Giant proposes to sample SWMUs #1, #2, and #13, using the protocol set forth in the approved RFI Sampling Plan, every five years, beginning in 1995, with annual reports due on December 31 of the sample year. This sampling will adequately

demonstrate migration, if any, of hazardous constituents. Giant appreciates your prompt attention to this proposal, as this will expedite completion of any responsibilities of Giant to fully characterize and monitor SWMUs #1, #2, and #13.

If you require additional information, please contact me at (505) 722-0227.

Sincerely,

Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

TLS:sp

cc w/attachment: David C. Pavlich, Giant
Kim Bullerdick, Giant
Rich Mayer, USEPA
Kathleen Cisneros, NMED

TLS\ADEPA894

GIANT
REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

September 30, 1994

Nancy Morlock
Hazardous Waste Management Division
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Quarterly Progress Report

Dear Ms. Morlock:

Pursuant to the requirements of the HSWA Permit, Condition C.4., Page 11 and the May 31, 1990 RFI Work Plan Approval, Giant Refining Company - Ciniza (Giant) submits the **Quarterly Progress Report** for the third quarter of 1994.

Giant has completed the additional sampling requirements as directed by the January 7, 1994 letter from the Hazardous Waste Management Division of Region VI, USEPA, with the notable exception of three sample points. At Tank 451, the drilling rig was too large to maneuver into the limited space around the tank, particularly in a safe manner. A portable pneumatic rig will be employed on October 24 or 25 to complete that boring. The photoionization detector (PID) that was used for this RFI event malfunctioned and we were unable to take readings around the leaded gasoline tanks. Consequently, Giant did not drill deep enough to get two "clean" samples. Giant has contracted Precision Engineering, Inc. to drill two additional borings to depths as needed to produce clean samples. This will occur on October 24 or 25.

Results of the sampling and analysis of those three sites will be submitted to USEPA on or before December 1, 1994.

Giant proceeded with all additional sampling and analysis needed to fulfill the requirements of closure of SWMU No. 10 - <u>The Sludge Pits</u> as set forth in the January 7, 1994 letter from your office.

Giant has, essentially, completed the "Report on Additional FRI Sampling" and will submit it on October 1, 1994.

During the fourth quarter of 1994, Giant will continue dirt work and sampling on SWMU No. 8 as closure of that SWMU continues. Giant will also be developing correction action plans for SWMUs as indicated in the "Report on Additional RFI Sampling".

Surveys of several SWMUs were made by registered surveyors in the third quarter of 1994. Copies of those survey plats will be submitted in the fourth quarter of 1994.

If you require additional information, please contact Lynn Shelton, of my staff, at (505) 722-0227.

"I certify under penalty of law that this document and all attachments were prepared under my direction to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

John Stokes

John Stokes
Refinery Manager
Giant Refining Company

JJS/TLS:sp

cc: Kim Bullerdick, Corporate Counsel
Giant Industries Arizona, Inc.

David Pavlich, Health, Safety, and Environmental Manager
Giant Refining Company

TLS\USEPA930

GIANT REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

June 28, 1994

Rich Mayer
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Quarterly Progress Report

Dear Mr. Mayer:

Pursuant to requirements of the HSWA Permit, Condition C.4., Page 11 and the May 31, 1990 RFI Workplan approval, Giant Refining Company - Ciniza (Giant) submits the Quarterly Progress Report for the second quarter of 1994.

Giant has completed piping modifications to the "Railroad Rack Lagoon" (SWMU #8) system and is presently evacuating the remaining water from the lagoon and disposing of it in the process wastewater system. As soon as it is feasible, Giant will sample the SWMU as required and begin bioremediation activities.

Giant is soliciting proposals for the survey requirement of SWMUs #1, 3, 8, 9 and 13.

Giant is also developing a scope and estimate of expense to further characterize SWMUs #4, 5, 6, 7, 10, and 11 and expects to complete that sampling during the third quarter of 1994.

If you require additional information, please contact Lynn Shelton, of my staff, at (505) 722-0227.

"I certify under penalty of law that this document and all attachments were prepared under my direction to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false

information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

John Stokes
Refinery Manager

JJS/TLS:sp

cc: Kim Bullerdick, Corporate Counsel
Giant Industries Arizona, Inc.

David Pavlich, Health/Safety and Environmental Manger
Giant Refining Company

GIANT
REFINING CO.

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

March 24, 1994

Rich Mayer
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Quarterly Progress Report

Dear Mr. Mayer:

Giant Refining Company - Ciniza (Giant) is submitting this Quarterly Progress Report as required by the May 31, 1990 RFI Workplan approval and HSWA Permit Condition C.4., Page 11.

Giant has reviewed the "Additional Requirements" of the Phase I, II, and III approval letters and will be scheduling a meeting with EPA in the near future to discuss those requirements.

Implementation of the Corrective Action Plan (CAP) for the "Railroad Rack Lagoon" (SWMU #8) can proceed now that weather conditions will support bioremediation activities.

If you require additional information, please contact Lynn Shelton, of my staff, at (505) 722-0227.

"I certify under penalty of law that this document and all attachments were prepared under my direction to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

John Stokes
Refinery Manager

JJS/TLS:sp

cc: Kim Bullerdick, Corporate Counsel, Giant Industries Arizona, Inc.
David Pavlich, Health/Safety Environmental Manager, Giant Refining