EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH

95 JAN 10 PM 3:23

GIANT
INDUSTRIES, INC.

Route 3, Box 7
Gallup, New Mexico
87301

January 6, 1995

William Honker, Chief
RCRA Permits Branch
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: RCRA Facility Investigation (RFI) Additional Sampling - Revised Report
Giant Refining Company - NMD000333211

Dear Mr. Honker:

Giant Refining Company - Ciniza submits the revised report requested in your letter of December 19, 1994. Specifically, the comments are listed and addressed below:

General Comment:

Giant needs to justify in a revised report why the detection limits for the volatile and semi-volatile 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.

Response:

Giant used the reporting limits for volatiles and semi-volatiles (8240/8260) that have been used in all of the RFI sampling since sampling began in 1990 and that are included in the approved Generic Sampling Plan (May 17, 1990). Giant recognizes that there is a considerable difference between the reporting (detection) limits used in the RFI sampling and the practical quantitation limits determined in a laboratory and that a comparison of the two was never intended. Because no regulatory requirements for reporting (detection) limits in soil were noted, Giant reasoned

that, for consistency, the reporting (detection) limits for all 8240/8260 analysis would remain the same as in past RFI sampling events. As the reporting (detection) limits were well below New Mexico Water Quality Control Regulations and NMED's Solid Waste Management Regulations corrective action levels, Giant considered the limits used to be reasonable and acceptable.

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.

Response:

A copy of the original laboratory data and QA/QC report was forwarded to Region VI on or about December 19, 1994.

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.

Response:

Giant will use the boring log/description format supplied by the EPA in all future borings required by EPA. A copy of of the requested format is attached. Giant will also lease an additional photo-ionization detector when conducting all future RFI sampling.

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 result for the soil sample was non-detect.

Response:

Although every effort is made during sampling to keep all equipment and materials downwind of the samples, it must be remembered that this is a field sampling project in a refinery and occasional changes in wind patterns, equipment movement, and sample collection, to name a few site variables, may bias certain observations. Giant feels that this is the case with sample 0513 at 16.0 feet and that exhaust fumes were detected with the PID.

Giant will keep more detailed notes of PID observations, PID background levels and weather changes on the RFI Data Management Forms during all future sampling required by EPA.

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.

Response:

Using the same sampling locations and intervals, numbering system, and sampling protocol as the August, 1994 event, Giant will bore and sample until two clean samples are obtained at each tank. This sampling will occur in the first quarter of 1995.

WAS THIS DONE

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.

Response:

The discolored soil mentioned in the field notes is the natural color. No hydrocarbon staining or odor was observed in any interval of this boring.

SWMU #11, Secondary Oil Skimmer - 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.

Response:

The "black fill" sand was a recording error. It should read "back filled" sand and I should have caught the mistake. There were some grey/black sections in the 1.5 to 7.5 foot interval that were not hydrocarbon contaminated. Those sections were most likely the natural soil color or possibly the end product of natural biodegradation of organic matter.

Thank you for the opportunity to address the deficiencies in the Report on the Additional RFI Sampling, October, 1994. If you require additional information, please contact me at (505) 722-0227.

Sincerely,

Lynn Shelton
Senior Environmental Coordinator
Giant Refining Company

TLS:sp

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

Benito Garcia, Bureau Chief HRMB
New Mexico Environment Department

TLS\WH-RCRA

BORING LOG
RFI Project 1995
Boring ID Number:
Date:

GIANT – CINIZA
Logged by:
Drilled by:
Total Depth:

Description (Include odors and discoloration of soil)	Depth	Symbol	Sample	PID (ppm)
	0.0			
	2.0			
	4.0			
	6.0			
	8.0			
	10.0			
	12.0			
	14.0			
	16.0			
	18.0			
	20.0			
	22.0			
	24.0			
	26.0			
	28.0			
	30.0			
	32.0			
	34.0			
	36.0			
	38.0			
	40.0			