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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
ALLIED BANK TOWER AT FOUNTAIN PLACE
1445 ROSS AVENUE
DALLAS, TEXAS 75202

June 15, 1987

Mr. Richard Traylor
Bloomfield Refinery, Plateau Inc.
East Sullivan Road
Bloomfield, New Mexico 87413

RECEIVED

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Re: Visual Site Inspection
Bloomfield Refinery
NMD09416416

HAZARDOUS WASTE SECTION

Dear Mr. Traylor:

The RCRA Hazardous and Solid Waste Amendments of 1984 under Section 3004(u) require a RCRA Facility Assessment (RFA) for your facility as part of the permitting process. The objective of this evaluation is to determine whether there have been, or are likely to be, releases of hazardous wastes or hazardous constituents at the facility which will require further investigation. This analysis will provide information to establish priorities for a subsequent RCRA Facility Investigation if needed.

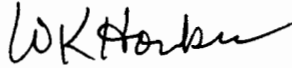
An integral part of the RFA is a visual site inspection to verify and determine the location of all "Solid Waste Management Units" (SWMUs). SWMUs are defined as "any discernible solid waste unit at a RCRA facility from which hazardous wastes or constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste" (USEPA, 1986). The SWMUs definition includes container storage units; tanks; surface impoundments; waste piles; land treatment units; landfills; incinerators; underground injection wells; physical, chemical and biological treatment units; recycling units; and areas contaminated by routine, systematic, and deliberate discharges from process areas.

We will visit your facility for the purpose of inspecting these SWMUs. This inspection is to enable EPA to attain a technical understanding of current and historical waste flows. Photographs of each SWMU are to be taken to document conditions at the facility and the waste management procedures. No samples will be taken during this inspection.

EPA may require the assistance of some of your personnel in reviewing solid waste flows, associated units, past and present disposal practices, construction and details of units, and any other solid waste management information. The attachment to this letter is a partial list of items which EPA will consider during the site inspection to clarify and supplement previously submitted information. The list is separated into general items and items related to SWMUs. Additional issues may be reviewed at the time of the site inspection.

The Visual Site Inspection is scheduled for June 24-25, 1987 at 9:00 a.m. Should you have any questions regarding this letter, please contact Mr. Greg Uetrecht at (214) 655-6790.

Sincerely yours,



Sam Becker, P.E.

for Chief

Hazardous Waste Compliance Branch

Attachment

cc: Joe Rowe, Black & Veatch



CRK

VISUAL SITE INSPECTION

BLOOMFIELD REFINING COMPANY
BLOOMFIELD, NEW MEXICO

DATE OF INSPECTION: June 24, 1987

TIME OF INSPECTION: 9:00 a.m.

INSPECTORS: Christopher D. Robb, Chemical Engineer/
Black & Veatch, Engineers-Architects

Anthony C. Davis, Civil Engineer/
Black & Veatch, Engineers-Architects

LIST OF QUESTIONS:

1. Does the facility currently operate under interim status?
2. Is the facility a generator only or is it a TSDF?
3. Has a RCRA Part B permit application been filed?
4. Describe where all listed hazardous wastes are produced, how they are handled, intervals at which they are removed, and how they are ultimately disposed of.
5. How long have the API separator, surface impoundments, and landfill been used at the facility? What types and quantities of materials have been disposed of in the landfill?
6. What is the current status of the units mentioned above (active, inactive, closed)?
7. Is wastewater still applied by the irrigation system?
8. Describe the facility's hydrocarbon recovery system.