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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

ALLIED BANK TOWER AT FOUNTAIN PLACE

1445 ROSS AVENUE

DALLAS, TEXAS 75202

MAR 04 1988

Mr. Jack Ellvinger
Program Manager
Hazardous Waste Section
Groundwater and Hazardous Waste Bureau
Environmental Improvement Division
New Mexico Health and Environment Department
P.O. Box 968
Santa Fe, New Mexico 87504-0968

Subject: Bloomfield Refining Company final closure plan, July 1986.
EPA I.D. No. NMD089416416

Dear Mr. Ellvinger:

My staff has reviewed the July 1986, closure plan submitted by Bloomfield Refining Company (BRC) in accordance with the U.S. EPA Consent Agreement and Final Order (Docket No. RCRA VI-501-H) signed November 26, 1985. This closure plan addresses closure of the API Wastewater Ponds, Landfill and Landfill Pond, as well as maintenance of the API Separator, North and South Evaporation Ponds, Slop Oil Tank, and Spent Caustic Tank. We offer the following comments on the closure plan to assist you in your review.

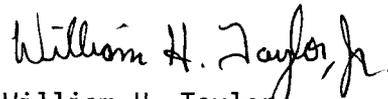
On the sampling conducted to determine closure methodology, it appears that all soil samples taken to determine the presence or absence of volatile aromatics were composite samples. If standard compositing techniques were followed, the procedure is to blend the aliquots to be composited until a homogeneous mixture is obtained and then sample a portion of the mixture to have analyzed for constituents. Such procedures are not appropriate when using volatile aromatics as the indicator parameters, as this methodology would tend to drive off the volatiles. Therefore, before a determination can be made about the presence of contaminants beneath the API Wastewater Pond liners, beneath the visible contamination zone in the Landfill Area, or in the sediments of the Landfill Pond, discrete samples must be taken and analyzed. The number of sample locations and depths used in proposing the July 1986 closure alternatives appears appropriate. However, sample handling should be as directed by SW-846. Head space analysis as well as residual volatiles analysis should be determined in each sample. Based on the results of these analyses, a determination should be made, consistent with SW-846, on the number of additional samples that will be necessary to confirm or deny the presence of contaminants at a confidence interval of 95% before developing the method of closure.

If BRC desires to close in place, or cannot show clean closure, they have the option of capping and groundwater monitoring the units to be closed, in conjunction with conducting the necessary corrective action.

BRC has demonstrated groundwater and surface water contamination, but has not defined the source of contamination. It must be assumed that this contamination originated from the units being closed until otherwise demonstrated. It is this Agency's position that if groundwater contamination exists and could have realistically been a result of migration from a land treatment unit, that unit cannot be clean-closed. We would therefore expect to see groundwater monitoring included in the closure plan. The closure plan as submitted would not be deemed adequate by EPA.

If you have any questions concerning this review, please do not hesitate to have your staff contact Guy L. Tidmore of my staff at (214)655-6775.

Sincerely,



William H. Taylor
Chief
Enforcement Section

cc: Dave Boyer, NMOCD