

 **ENTERED**

M E M O R A N D U M

TO: FILE
FROM: Bruce Swanton, EID *BS*
DATE: 10/22/90
SUBJECT: Bloomfield Refinery - Conversation with Chris Hawley

Chris Hawley is Bloomfield's Environmental Engineer. (632-8013)

Bloomfield Ownership. Gary Williams Companies owns Gary Williams Energy which is the parent company of the entity called Bloomfield Refining Company, Inc, which owns Bloomfield Refinery.

History. In 1982 refinery was owned by Plateau. There were two small surface impoundments ("Oily Water Ponds") downstream of the API separator. At this time they cleaned out the two impoundments intending to line them. They took the most contaminated sludges offsite for disposal. Some of the underlying material was tested for characteristics, was found not to be hazardous waste, and was landfilled onsite. One of the impoundments was divided in two at this time, so there are now three upper ponds.

At an EPA inspection in about 1983 (still owned by Plateau) EPA decided that this material may have contained some listed hazardous waste (K-wastes).

Bloomfield refining bought out Plateau in Nov., 1984, inheriting the debate and the obligation for solving the 1983 NOV and working w/ EPA to a 1985 Consent Agreement. Settled everything except for the closure of the old landfill where the K-wastes were buried. This remains an outstanding item.

Bloomfield did not know how much material was buried in the landfill. Last year they excavated all the material from the landfill using Geoscience Ltd. as an "outside" witness. This is in a March 5, 1990 letter to Jack Ellvinger. Jack said he sent this letter to the EPA for action.

Bloomfield has since done extensive testing on this excavate including Appendix VIII, or as required in the delisting process. Used TCLP on some of the parameters. Got non-detect on all organics and no EP-TOX or TCLP exceedances for metals.

Current Events. They do not want to go the delisting process, want to meet to discuss other alternatives.

Depth to a perched water table is 25 feet. They say: the perched water table results from an irrigation ditch and refinery activities; next lower zone is artesian and is at roughly 400 feet past a impermeable sandstone formation and is called the Ojo Alamo aquifer; the Ojo Alamo has 40-50 feet of head.

Bloomfield thinks it is now possibly a treatment facility due to benzene in the surface impoundments. The discharge is now below the 0.5 ppm limit, but the impoundment water exceeds it. Downstream of the "Oily water ponds" are two 5-acre double lined (high den. polyethylene) and two 2.5 Ac evaporation ponds (lined with clay). Bloomfield is in process of double lining these as well.

My Response. I told Chris that I would have to coordinate with EPA on this issue as apparently the fate of the excavated material is an issue in an outstanding EPA enforcement action. Having determined what EPA intends to do in this situation I will recontact Chris and, if appropriate, arrange for an EID/Bloomfield meeting.