



**Bloomfield Refining  
Company**

A Gary Energy Corporation Subsidiary

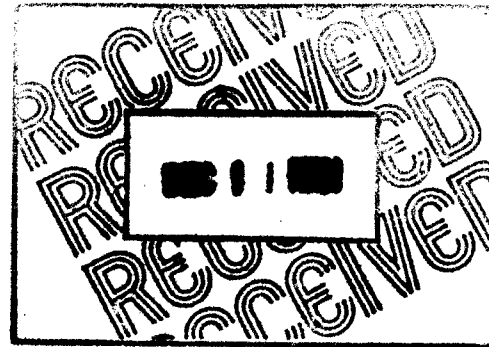
December 10, 1991

Mr. Ed Horst  
New Mexico Environmental Division  
P. O. Box 26110  
Santa Fe, New Mexico 87502-6110

RE: Request for Regulatory Opinion



**ENTERED**



Dear Mr. Horst:

Bloomfield Refining Company (BRC) operates a hazardous waste treatment facility consisting of three small, lined surface impoundments equipped with aspirating aerators. The treatment process, designed to remove benzene and other contaminants from the refinery's wastewater stream through the use of aggressive biological treatment in the form of high-rate aeration, is very effective, with most hydrocarbon contamination removed in the first impoundment.

Since surface impoundments are not exempted by the 90-day rule, BRC proposes to replace the impoundments with a tank treatment system so that this particular hazardous waste may be accumulated on site for ninety (90) days or less without a permit or without having interim status as allowed by New Mexico HWMR Part II, 204 B.1. BRC would operate the tank system in accordance with NM HWMR 206 C.5 and other applicable regulations. The tank system would be sized and equipped with adequate mixing equipment to ensure that the wastewater volume moves through the system in less than 90 days. Preliminary estimates indicate that sojourn time for the refinery's wastewater discharge in each tank could be limited to less than a day.

Bloomfield Refining Company respectfully requests that the New Mexico Environmental Division confirm that a tank system would be considered as less than 90-day accumulation. BRC would continue to operate the surface impoundments, or portions thereof, in accordance with applicable New Mexico hazardous waste regulations until those impoundments are closed in accordance with a closure plan.

BRC is prepared to work closely with the Division in resolving any issues concerning this request. A data sheet is enclosed concerning this request. Please feel free to contact me or Chris Hawley of my staff for any additional information you may require.

Sincerely,

Dave Roderick  
Refinery Manager

DR/jm

Enclosure

cc: Joe Warr  
Chris Hawley  
John Goodrich

Bloomfield Refining Company  
Hazardous Waste Treatment - Data Sheet

EPA I.D. Number: NMD 089 416 416

Lined Treatment Impoundments

Number: 3 identified as SOWP, NOWP-W, and NOWP-E.  
Size: SOWP: 7,800 sq. ft., 6 ft. deep, 350,000 gals.  
NOWP-W: 10,000 sq. ft., 6 ft. deep, 440,000 gals.  
NOWP-E: 7,500 sq. ft., 6 ft. deep, 330,000 gals.  
Flow order: SOWP to NOWP-W to NOWP-E.  
Equipment: 100 mil HDPE liner, French drain leak  
detection system. SOWP equipped with two  
5 hp aspirating aerators, NOWP-W equipped with  
one 2 hp aspirating aerator, and NOWP-E  
equipped with one 2 hp aspirating aerator and  
a 2 hp splash aerator for backup. (Note: The  
liner was installed in 1982. All sludges were  
removed prior to liner installation. This was  
confirmed with analytical data obtained in  
1985.)  
Thruput: Average of 70 gpm, minimum of 50 gpm.  
Benzene removal efficiency: 10 ppm benzene in API  
discharge, less than 5 ppb  
in SOWP discharge. 100%.

Proposed Tank System

Number: 3  
Size: 40 ft. dia., 6 ft. liquid level, 2 ft. freeboard.  
Capacity: 56,000 gals. each.  
Sojourn: 0.8 days at 50 gpm.  
Equipment: Primary and Secondary containment, aerators as  
required.