



BRUCE KING  
GOVERNOR

State of New Mexico

ENVIRONMENT DEPARTMENT

HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU  
RADIATION LICENSING AND REGISTRATION SECTION

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 ENTERED

December 20, 1991

BLMF  
JW

Dave Roderick  
Refinery Manager  
Bloomfield Refining Co.  
PO Box 159  
Bloomfield, NM 87413

Dear Mr. Roderick,

This letter is in response to your letter of December 10, 1991 inquiring about the potential permit status of a tank aeration unit to replace the surface impoundments currently in use at your facility.

The tank treatment system that you refer to in your letter would be a permittable unit and would not be exempt using the 90-day rule. Although waste residence time would be less than a day, the characteristics of the tank clearly fit the treatment definition given in 40 CFR section 260.10. Therefore, bringing such a unit on-line would require a Class III modification to your operating permit.

If you have any questions regarding this matter, please call Dr. Herb Grover of my staff at 827-4300.

Sincerely,

Edward L. Horst  
RCRA Program Manager  
Hazardous and Radioactive Materials Bureau

xc: Benito Garcia, Chief, HRMB  
Herb Grover, RCRA Supervisor, HRMB  
Bruce Swanton, RCRA Technical Unit Supervisor, HRMB