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MEMORANDUM

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TO: Benito Garcia, Chief HRMB  
FROM: Tom Tatkin, RCRA Permitting  
DATE: July 22, 1992  
SUBJECT: Bloomfield Refining Company (BRC)



In Susan Collins absence I was asked to visit BRC.

Today I returned from the Farmington area where visited the Bloomfield Refinery. The purpose of my visit was to tour the RCRA hazardous waste treatment aspect of the facility and discuss with appropriate personnel the status of their impending plans. Currently, BRC retains interim status for their 3 surface impoundments. Until September 1989, the impoundments were not regulated under RCRA because benzene in API separator sludge did not break the EP toxicity test. However, when the TC Rule became affective in September 1990 the impoundments were pulled into the RCRA universe. BRC had 6 months from the date the TC Rule was promulgated (March 1990) to submit a Part A. This requirement was satisfied when the Part A was received on September 27, 1990.

BRC has been studying a strategy for dealing with environmental regulations. In December 1991 and January 1992 BRC wrote to our office requesting an opinion concerning the replacement of the 3 impoundments with a tank treatment system. Prior to that time, BRC prepared and submitted a Part B for permitting the 3 surface impoundments. They also studied the possibility of getting an NPDES permit, which would exempt them from RCRA. They found that the NPDES permit was not a realistic approach at this time. So, they are continuing to investigate the impoundment or tank approach. We received the Part B for the surface impoundments at the prescribed time, September 1991. Replacing the surface impoundments with the tank treatment system (suggested by our office to be a miscellaneous unit) is still being considered by BRC.

Administrative review of the Part B is slated to begin in the first quarter of FY 93.

Side note - In scanning the Part B application, it was noted that there are no plans included that address retrofitting the impoundments with a secondary liner and leachate collection system. The Part B may also need to include a sampling and analysis plan for groundwater monitoring.

xc: Susan Collins