



BRC Red File  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

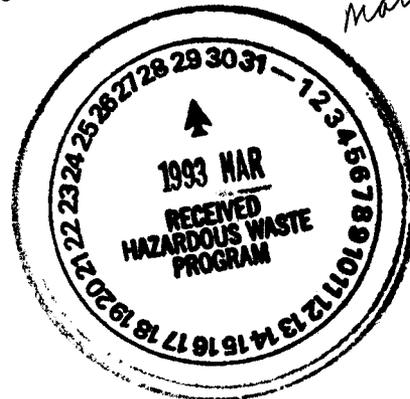
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CERTIFIED MAIL #P 176 163 648

March 26, 1993

Mr. Chris Hawley  
Environmental Manager  
Bloomfield Refining Company  
P.O. Box 159  
Bloomfield, NM 87413



XIII

RE: EPA RESPONSE TO INTERIM MEASURES WORKPLAN  
~~Bloomfield Refining Company~~  
EPA ID # NM089416416

Gentlemen:

The U.S. Environmental Protection Agency (EPA) has performed a technical review of Bloomfield's Interim Measures (IM) Workplan for the Bloomfield Refining Company facility (BRC), located in Bloomfield, New Mexico. BRC submitted the IM Workplan to EPA as one of the requirements of the Administrative Order on Consent (Order), EPA Docket No. VI-303-H, dated December 31, 1992.

EPA reviewed BRC's IM workplan to determine if it fulfills the requirements of the Order. The IM Workplan satisfies the majority of the requirements of the Order; however, several comments must be addressed prior to approval. As per the Order, BRC has 30 days in which to fully address EPA comments. If BRC does not adequately address EPA concerns, EPA will modify the revised submittal and it shall become the approved workplan.

GENERAL COMMENTS

- 1) The IM workplan should clarify if the existing ground water recovery system is recovering SPH as a DNAPL, LNAPL or both. The SPH contour map in the workplan indicates that SPH is absent from the proposed recovery well locations. However, hydrocarbon seeps have been observed along the San Juan River bluff at the contact between the Nacimiento and Jackson Lake Terrace. It therefore appears that there may be a DNAPL component in the ground water. The IM workplan should address the presence of both DNAPL and LNAPL phases.
- 2) Has it been determined if the gravel zone is continuous over the area in which the recovery wells will be installed? Since the objective of the two additional recovery wells is to prevent further migration off-site to the San Juan River, it is suggested that a cross section illustrating the position of the proposed recovery wells in relation to the lithology of the Jackson Lake Terrace be included in the workplan. The rationale for choosing a twenty-five foot screen for the recovery wells should be presented. How does the screen length relate to the SPH/water table interface?

- 3) Have approximate radius of influence determinations been made for the existing recovery wells? If so, please provide the information.
- 4) Has the impact of the Hammond Ditch on the proposed recovery wells been determined or modeled. If so, please provide the information.

SPECIFIC COMMENTS

1.4, Groundwater Monitoring, third paragraph, page 6

The workplan states "*due to the significant presence of SPH in both the upgradient and down-gradient wells, a meaningful groundwater monitoring program for RCRA compliance is unlikely.*" This sentence must be explained, including any rationale which was used to arrive at this conclusion. If upgradient wells are impacted by the presence of SPH, then additional upgradient wells are required. The IM workplan should contain the necessary analytical results.

2.3, Closure of Solid Waste Management Units, first paragraph, page 13

In the last sentence, the term "*minor*" must be deleted or explained further.

3.0, Proposed Additional Interim Measures, third paragraph, page 16

BRC must add language in this section which states that groundwater samples will be collected from the recovery wells and analyzed for Appendix IX constituents for volatile organics, semi-volatile organics, priority pollutant metals, and TPH.

All of these comments must be adequately addressed. Should you have any questions or comments, please do not hesitate to contact the undersigned at (214) 655-8317.

Sincerely,

  
Greg J. Lyssy  
Project Coordinator (6H-CX)  
RCRA Technical Section  
RCRA Enforcement Branch

cc: Ed Horst, New Mexico Environment Department