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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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DALLAS, TX 75202-2733



RETURN RECEIPT REQUESTED CERTIFIED MAIL # P176 163 667

August 27, 1993

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

RE: EPA RESPONSE TO BLOOMFIELD RFI WORKPLAN, Bloomfield Refining Company  
EPA ID # NM089416416

Gentlemen:

The U.S. Environmental Protection Agency (EPA) has performed a technical review of Bloomfield's RCRA Facility Investigation (RFI) Workplan for the Bloomfield Refining Company facility (BRC), located in Bloomfield, New Mexico. BRC submitted the RFI 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. The RFI Workplan was received by EPA on April 1, 1993.

EPA reviewed BRC's RFI Workplan to determine if it fulfills the requirements of the Order. The RFI Workplan satisfies the majority of the requirements of the Order; however, several comments must be addressed prior to approval. These comments were discussed with BRC on August 2, 1993 when EPA conducted a corrective action oversight inspection at the Facility. 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.

SPECIFIC COMMENTS

Section 1.0, Introduction, page 2

The workplan contains a discussion of the Project Management Plan, Data Collection Quality Assurance Plan, Data Management Plan, and Health and Safety Plan. It does not contain a description of the Community Relation Plan (CRP). A discussion of the CRP should be added.

Section 1.1, Facility Description, page 2

The workplan lists eleven products which are produced at the facility. The workplan should ensure that all of the constituents from the produced products are analyzed for in the proposed sample analysis.

Section 1.3, Hazardous Waste Activity, page 5

The workplan states "in response to a RCRA 3008[a] Order, BRC prepared a closure plan for the NOWP, SOWP, Landfill, and Landfill pond which included soil sample data from these areas supporting closure. The purpose of the closure plan was to make [mute] the issue as to whether or not these units were RCRA-regulated." BRC shall provide the rationale and any supporting documentation to support that statement.

Section 1.4, Areas and Hazardous Waste Constituents of Concern, page 8

The workplan states that the entire site will be considered as one Corrective Action Management Unit (CAMU) for remediation. This statement must be clarified or deleted. In order to utilize the CAMU provisions as part of the Order, the facility will be required to meet the requirements of 40 CFR § 264.552 and 40 CFR § 264.553. BRC must request the use of CAMU at the appropriate time, and if all of the referenced requirements are met, the facility will be allowed to use CAMU(s) for management of remediation wastes pursuant to implementing corrective action requirements at the facility.

Section 1.4, Areas and Hazardous Waste Constituents of Concern, page 8

The workplan states that ground water plume delineation will be useful for design of the corrective measures for the site and for the development of the ground water monitoring program. This statement must be revised to reflect the actual requirements of an RFI. The RFI workplan must provide the rationale necessary to determine if a release has occurred to the environment in any media. If a release has occurred, then the complete horizontal and vertical extent of contamination must be determined.

Section 1.4, Areas and Hazardous Waste Constituents of Concern, page 8

There is missing language between page 8 and page 9. The missing language should be added.

Section 1.4, Areas and Hazardous Waste Constituents of Concern, page 9

The workplan states that selected soil samples will be collected during the soil vapor survey for laboratory analysis of VOCs. It is understood that the soil gas survey will be utilized for determining VOC concentrations in the soil gas. However, soil samples collected as part of this phase should be analyzed for the required Appendix IX constituents. BRC shall provide the rationale for only analyzing the soil samples for VOCs.

Section 1.5, Data Acquisition Objectives, page 10

The workplan states that the entire site will be considered as one Corrective Action Management Unit (CAMU) for remediation. This statement must be clarified or deleted. In order to utilize the CAMU provisions as part of the Order, the facility will be required to meet the requirements of 40 CFR § 264.552 and 40 CFR § 264.553. BRC must request the use of CAMU at the appropriate time, and if all of the referenced requirements are met, the facility will be allowed to use CAMU(s) for management of remediation wastes pursuant to implementing corrective action requirements at the facility.

Section 1.5, Data Acquisition Objectives, Phase I, page 11

The workplan does not propose to place any soil vapor survey points along the Hammond Ditch area. Additional sampling locations are needed to provide information on the possible plume migration towards the San Juan River. As discussed in our meeting on August 9, 1993, additional soil vapor survey locations shall be added near Hammond Ditch and between Hammond Ditch and the San Juan River.

Section 1.5, Data Acquisition Objectives, Phase I, page 11

The workplan states that only ten soil samples will be collected during the soil gas survey. Provide the rationale and justification for collecting only ten soil samples during the soil gas survey.

Section 1.5, Data Acquisition Objectives, Phase II, page 11

The workplan states that three soil samples will be analyzed for physical parameter testing. Due to the size of the facility, additional samples may be required to characterize the lithologic conditions across the site. Provide the rationale and justification for selecting only three soil samples.

Section 1.5, Data Acquisition Objectives, page 12

The workplan states that stream sediment and surface water samples will be collected during low flow conditions. The workplan does not provide the number of samples that will be collected, or their prospective location. This information must be provided.

Section 2.1, Technical Approach, page 13

The workplan states "the objectives of the RFI are to investigate the sources of contamination and determine the nature and extent of contamination." It should be noted that the purpose of the RFI is to characterize the site and fully delineate, both horizontally and vertically, the complete extent of contamination.

Section 2.1.1, Phase I: Soil Vapor Survey/Soil Sampling, page 14

The detection limits listed for the soil gas survey are in the low part per trillion (ppt) range using an FID detector. The detection limits appear to be too low for an FID. The numbers should be revised to reflect actual detection limits.

Section 2.1.1, Phase I: Soil Vapor Survey/Soil Sampling, page 15

The workplan states that soil samples will be collected during the soil vapor survey for laboratory analysis of VOCs. It is understood that the soil gas survey will be utilized for determining VOC concentrations in the soil gas. However, soil samples collected as part of this phase should be analyzed for the required Appendix IX constituents. BRC shall provide the rationale for only analyzing the soil samples for VOCs. The workplan states that only ten soil samples will be collected during the soil gas survey. Provide the rationale and justification for collecting only soil samples from only 10 percent of the sampling locations during the soil gas survey.

Section 2.1.2, Phase II: Soil Borings/Soil Sampling and Analysis, page 16

The workplan states that three soil samples will be analyzed for physical parameter testing. Due to the size of the facility, additional samples may be required to characterize the lithologic conditions across the site. Provide the rationale and justification for selecting only three soil samples.

Section 2.1.3, Phase III: Groundwater Monitoring Well Installations, page 17

Specific information on the ground water monitoring wells, including screen length is not presented in the workplan. The specific information must be provided. It is recommended that screen lengths not exceed ten feet. Additional information on the design and appropriateness of fiberglass reinforced well casing and screen should also be provided. Soil cuttings shall be disposed of in accordance with all applicable Federal and State regulations.

Section 2.1.3, Phase III: Groundwater Monitoring Well Installations, page 18

The workplan states that two ground water samples will be analyzed for water quality parameters. BRC must provide the justification and rationale for only analyzing two samples for water quality parameters.

Section 2.1.4, Phase IV: Field Studies, Page 21

The workplan states that six vapor samples will be collected during the pilot air sparging test, three during the vapor extraction test, and three during the air sparge test. Given the variables involved during air sparging, additional samples will probably be required. BRC should be prepared to modify the frequency of sample testing during the pilot tests.

Section 3.2.3.1, Well Materials, Page 40

The workplan states that 20-foot, 0.020-inch slotted screen and Global No. 5 silica sand filter material will be used for installation of the ground water monitoring wells. In the next paragraph, the workplan states that 0.036-inch slotted screen will be utilized. It is recommended that a screen length be limited to ten feet in length. The screen slot size and filter material should be based upon aquifer characteristics. It is recommended that sieve tests be conducted in the field to determine the appropriate monitoring well design specifics. The discrepancy between slot sizes must be clarified.

Section 3.2.4.2, Ground Water Sampling Procedures, Page 43

The workplan states that ground water samples will be collected for laboratory analysis when temperature, pH, and conductivity have stabilized, or when three well volumes have been removed from the well, whichever comes first. If the parameter measurements have not stabilized after three well volumes have been purged, additional amounts of water must be purged. The intent of the ground water sampling is to provide representative results of the ground water conditions. It is important that the parameters have stabilized prior to collecting samples. BRC must clarify the statement.

Section 3.2.4.2, Ground Water Sampling Procedures, Page 43

The workplan states that a submersible pump may be used to collect ground water samples. Due to the turbulence that a submersible pump creates, a submersible pump shall not be used to collect samples in ground water monitoring wells.

Section 3.2.4.2, Ground Water Sampling Procedures, Page 44

The workplan states that samples collected for metals analysis will be filtered in the field. The metals samples should be analyzed for total metals content, not just the dissolved portion. Therefore, samples for metals analysis shall not be field filtered.

Section 3.2.5.2, Sampling Procedures, Page 47

The workplan states that samples collected for metals analysis will be filtered in the field. The metals samples should be analyzed for total metals content, not just the dissolved portion. Therefore, samples for metals analysis shall not be field filtered.

Section 3.2.5.3, Sample Containers and Preservation, Table 5, Page 49

The workplan states that BNAs should be preserved with HNO<sub>3</sub> to a pH < 2.0. SW-846 states that BNAs are not preserved with HNO<sub>3</sub>, but merely cooled to 4° C.

Section 5.5, Fact Sheet and Public Meeting, Page 70

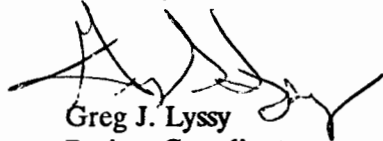
The workplan states "a public meeting will be held upon request from a number of citizens or if EPA and BRC deem a public meeting is appropriate based upon public concern and misunderstandings." This sentence should be deleted. Upon completion of the CMS report, EPA will review the information and develop a Statement of Basis. A public meeting will be held, if determined by EPA to be necessary, to inform the public of the proposed remedy that will be implemented at the facility. EPA will conduct the meeting.

Appendix D, Section 9.0, Analytical Procedures, Pages 26 - 29

The detection limits listed for the various constituents are different from the PQL's listed in SW-846. These numbers should be corrected.

All of these comments must be adequately addressed prior to approval of the RFI workplan. 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  
Technical Section (6H-CX)  
RCRA Enforcement Branch

cc: Ed Horst, New Mexico Environment Department