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ENTERED  
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Secretary

JON GOLDSTEIN  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 6, 2008

Mr. Randy Schmaltz  
Environmental Manager  
Giant Refining Company  
P.O. Box 159  
Bloomfield, New Mexico 87413

**RE: APPROVAL WITH DIRECTION  
RIVER TERRACE VOLUNTARY CORRECTIVE MEASURES  
BIOVENTING SYSTEM ANNUAL REPORT  
JANUARY 2007 THROUGH DECEMBER 2007  
GIANT REFINING COMPANY, BLOOMFIELD REFINERY  
EPA ID# NMD089416416  
HWB-GRCB-08-002**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) has reviewed Bloomfield Refinery's (owned by San Juan Refining Company, operated by Western Refining Company) (Western) *River Terrace Voluntary Corrective Measure Bioventing System Annual Report (January 2007 through December 2007)* (Report), dated January 2008. NMED hereby issues this Approval with Direction and provides the following comments.

**Comment 1**

Western states in the Executive Summary that "[a] facility plot plan and river terrace project plot plan are provided in Section 7.0."

The plot plans are found in Section 8.0. No revision is necessary, but this must be corrected in the next report.

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**Comment 2**

In the Groundwater Monitoring Table provided in Section 5.0, Tab 2, Western applied the diesel range organic (DRO) screening concentrations for diesel #2/crankcase oil for groundwater (1.72 mg/L) found in Table 2a of NMED's Total Petroleum Hydrocarbon (TPH) Screening Guidelines. Western must explain why the screening value for diesel # 2 crankcase oil was applied instead of the screening value for unknown oil.

**Comment 3**

The Groundwater Monitoring Table provided in Section 5.0, Tab 2 must be revised in the next annual report to include the Maximum Contaminant Level (MCL) for benzene (.005 mg/L) and ethylbenzene (0.7 mg/L) which are lower values than the Water Quality Control Commission (WQCC) standards for benzene (0.01 mg/L) and ethylbenzene (0.75 mg/L).

**Comment 4**

NMED has the following comments related to Section 5.0, Tab 3, (Groundwater Monitoring – Total Metals).

- a. Western lists the WQCC standard for barium as 2 mg/L and for chromium as 0.1 mg/L. The WQCC standards for barium and chromium are 1.0 mg/l and 0.05 mg/L, respectively. This must be revised in the next annual report. Note that these standards were reported correctly in the text in Section 7.0 (Summary), page 2.
- b. The table lists the MCL for arsenic as 0.05 mg/L. The MCL for arsenic is 0.01 mg/L. Western must apply the correct MCL for arsenic in the next annual report.
- c. The table lists the MCL for silver as 0.05 mg/L; however, there is no MCL for silver. The WQCC for silver is 0.05 mg/l. Western must list the correct source for the standard for silver in the next annual report.

**Comment 5**

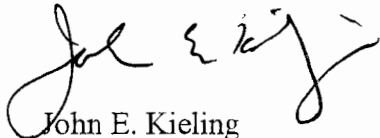
In the next annual report, Western must include soil vapor and groundwater benzene, toluene, ethylbenzene, and xylenes (BTEX) concentration maps for all quarters.

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Western must address all requirements included in this letter in future reports. Western must also submit a response to Comment 2 on or before June 3, 2008. In accordance with Section V.B.1, item 3 of Order No. HWB 07-34 (CO); the annual report is due on or before March 1, 2009. Western must follow the sampling requirements established in Table 1 (Groundwater Monitoring) and Table 2 (Soil Vapor Monitoring) of NMED's April 18, 2007 and June 13, 2007 letters, respectively. If any anomalies (e.g. unexpected detections or concentrations, plume migration) are observed during the quarterly sampling, NMED and the Oil Conservation Division (OCD) must be notified within 5 business days of discovering the anomaly.

If you have any questions regarding this letter, please contact Hope Monzeglio of my staff at (505) 476-6045.

Sincerely,



John E. Kieling  
Program Manager  
Permits Management Program  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
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