

Fed Ex #: 8709 9688 0476

October 23, 2009

John Kieling, Program Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, NM 87505-6303

Re: Response to September 1, 2009 APPROVAL WITH DIRECTION
2008 Groundwater Remediation and Monitoring Annual Report
Western Refining Southwest, Inc., Bloomfield Refinery
EPA ID# NMD089416416
HWB-GRCB-09-003

Dear Mr. Kieling:

Western Refining Southwest, Inc., Bloomfield Refinery has prepared the following responses to your comments (dated September 1, 2009) on the referenced 2008 Groundwater Remediation and Monitoring Annual Report. The requested revised report sections are enclosed.

Comment 1

In Section 3.0 (Scope of Activities), page 2, paragraph 3 under "Seep/Sump Wells," Western states "[d]uring the week of August 11, 2008, samples were collected from Seep 1, 3, and 6 and as required by the Facility-Wide Groundwater Monitoring Plan (Revised May 2008) were analyzed for BTX and MTBE (EPA 8260), SVOCs (EPA 8270), and general chemistry (EPA 300.0 and SM 2320B). Results can be found in Section 9.0, Tab 9.0."

Samples collected from Seep 1, 3, and 6 were required to be analyzed for total dissolved solids (TDS), carbon dioxide, and specific conductance in accordance with Table 3 (Facility-Wide Monitoring Program) of the December 2007 Facility-Wide Groundwater Monitoring Plan (FWGMP). The analyses for these constituents were not mentioned in the text or in Section 9.0 (Tables), Tab 9.0, with the exception of carbon dioxide. In the response letter, Western must explain why TDS and specific conductance were not analyzed. Western must ensure that TDS and specific conductance are included in the analysis at Seeps 1, 3, and 6 during the next annual

groundwater monitoring event. In addition, the text of future annual groundwater monitoring reports must discuss all constituents that were analyzed or include an explanation as to why a specific analysis was not conducted.

Response:

Total dissolved solids, pH, conductivity, and temperature were collected in the field using an Ultrameter 6P (hand-held instrument). The results of these field measurements have been added to Section 9.0, Tab 4 of the 2008 Annual Report. A copy of the additional field measurement data for inclusion in NMED's copy of the 2008 Annual Report is attached.

Comment 2

*In Section 3.0 (Scope of Activities), page 2, paragraph 2 under **Groundwater Monitoring**, Western states "[t]he facility-wide semi-annual monitoring event occurred during the week of April 7, 2008. Guidelines from the Facility-Wide Groundwater Monitoring Plan (Revised December 2007) were followed. East Outfall #2 and East Outfall #3 were sampled and analyzed for BTEX/MTBE (EPA 8260), Dissolved metals (EPA 6010B), Total Metals (EPA 6010B & 7470), Anions (EPA 300.0, and Alkalinity (SM 2320B). Field measurements of E.C., pH, and temperature were also read."*

According to Table 3 of the FWGMP, samples collected from East Outfall #2 and East Outfall #3 should have been analyzed for carbon dioxide. The analysis of carbon dioxide was not mentioned in the text, but the results were included in the Table "Groundwater Analysis-General Chemistry" found in Section 9.0 (Tables), Tab 9. In the next annual groundwater monitoring report, the text must identify all constituents included in the sample analyses.

Response:

Western will include text identifying all constituents included in the sample analysis for future groundwater monitoring reports.

Comment 3

*In Section 3.0 (Scope of Services), page 2, paragraph 2, under "**Seeps/Sump Wells**," Western references the Facility-Wide Groundwater Monitoring Plan (Revised May 2008) and in the same section under **Groundwater Monitoring**, Western references Facility-Wide Groundwater Monitoring Plan (revised December 2007). Western provides two revision dates; however, the approved FWGMP document is dated as the "revised December 2007" document. In future annual groundwater monitoring reports, Western must reference documents consistently and apply the correct revision date.*

Response:

In May 2008, Western modified Section 5.3.1 and Table 3 of the FWGMP to include monitoring of the Seeps and Sump Wells, as directed by NMED in the Approval with Direction Facility-Wide Groundwater Monitoring Plan dated March 25, 2008. The

revised section and tables in the FWGMP were footnoted with a revision date “revised May 2008,” which is why the reference was made in Section 3.0 of the 2008 Annual Report.

To be consistent with on-going reporting, Western will reference the FWGMP (revised December 2007) document for future reporting, which will assume inclusion of the additional monitoring directed by NMED in the March 25, 2008 letter.

Comment 4

In Section 3.0 (Scope of Services), Western lists the constituents and analytical methods utilized during the semi-annual and annual sampling events. Western left out the analysis of total dissolved solids; however, the results for these analyses were identified in the tables. In future groundwater monitoring reports, Western must identify in the text all analyses conducted during the monitoring event or explain any deviations from the FWGMP.

Response:

Western will identify all analyses conducted during the monitoring event or explain any deviations from the FWGMP in future reporting.

Comment 5

In the next annual groundwater monitoring report, Western must include the following changes to Section 4.0 (Regulatory Criteria/Groundwater Cleanup Standards/State of New Mexico Soil Screening Levels):

- a. *On page 1, Western applies the Water Quality Commission Control (WQCC) standard for lead (0.05 mg/L). Western must replace this with the MCL which has a lower standard (0.015 mg/L).*
- b. *Western must reference the Regional Screening Levels (RSLs) which have replaced the USEPA Region VI Human Health Medium-Screening level and the Federal Maximum Contaminant Levels. The RSLs can be located at http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_talbe/index.htm.*
- c. *Western must revise the title of this section to remove the reference to the “State of New Mexico Soil Screening Levels” since these standards are not applied in this Report.*

Response:

Western will include the above mentioned changes to Section 4.0 for all future reports.

Comment 6

Table 3 of the FWGMP segregated the wells located at the facility into four groups; these groups and the associated wells are listed in the text of Section 8.0 (Summary – Conclusions and Recommendations). Western must revise Section 8.0 in the next annual groundwater monitoring

report to include MW-31 to the cross-gradient group and include MW-31 and MW-40 to the refinery wells group. These wells are not identified in the Report but are listed in Table 3 of FWGMP.

Response:

MW-31 was inadvertently listed twice on Table 3. As stated in **Section 5.1.1 Sampling Locations** of the Facility-Wide Groundwater Monitoring Plan (Revised December 2007), MW-31 is considered a Refinery Area well due to its location in proximity to the Refinery Process Areas. MW-31 was not intended to be considered a Cross-gradient well. Table 3 has been revised to reflect this clarification. A revised Table 3 is attached.

For future reporting, Western will revise Section 8.0 to include MW-31 and MW-40 to the refinery wells group.

Comment 7

In Section 9.0 (Tables), Tab 3, Western provides Sump Well Fluids Monitoring data for June 2008. The Separate Phase Hydrocarbon Thickness Column for SW5-0206, SW6-0206, and SW7-0206 show negative numbers. Western must provide an explanation for the negative numbers or provide the correct data in the response letter and make all necessary corrections to the next annual groundwater monitoring report.

Response:

The negative numbers reflect the fact that no product was detected at those locations. Western inadvertently did not change the negative numbers to the appropriate notation "NPP." The correct notation to be used for wells with no separate-phase hydrocarbon detected is "NPP" (which stands for No Product Present). These changes for the respective tables of Section 9.0 of the 2008 Annual Report have been made. The revised tables are attached.

Comment 8

In Section 9.0 (Tables), Tab 5, page 3, the table "Background Wells, Groundwater Analysis – Total Metals" identifies monitoring well (MW)3. The August 06 results for this well are listed as "NS¹" (which is noted as "Well is Dry or Not Enough Water to Sample – No Sample") for all metals except chromium and lead. If a sample was not collected, it is not clear why results are reported for chromium and lead. Western must provide an explanation for the analytical results in the response letter and make any necessary correction(s) to the next annual groundwater monitoring report.

Response:

The chromium and lead results were inadvertently transposed from the 2005 results. The rest of the results for 2006 should read "NS¹" (which is noted as "Well is Dry or Not Enough Water to Sample – No Sample"). Samples were not collected at MW-3 in 2006;

therefore the summary results table should reflect “NS¹” for all entries across the row. The revised table is attached.

Comment 9

In Section 9.0 (Tables), Western applied NMED’s Total Petroleum Hydrocarbon Screening Guidelines, diesel #2/crankcase oil (1.72 mg/kg) for diesel range organics (DRO). Western must apply the “unknown oil” screening guideline of 0.2 mg/l to future annual groundwater monitoring reports. If Western can confirm that DRO at the facility is diesel #2/crankcase oil, then the 1.72 mg/kg may be applied, but the basis using diesel #2/crankcase oil must be included.

Response:

Western will apply the appropriate screening levels and include justification for the respective screening levels in future reports with regards to DRO analysis.

Comment 10

In Section 3.0 (Scope of Activities), page 4, Western states “[a]t least three well volumes were purged from each well prior to sampling. Electrical conductance, pH, and temperature were monitored during purging using an Ultrameter 6P.” In Section 12 (Field Methods), page 1, Western states under Water Quality/Groundwater Sampling that “[w]ater quality parameters are measured using an Ultrameter 6P by the Myron L Company. Electrical conductance, oxidation-reduction potential (ORP), pH, and temperature are monitored during purging.”

The FWGMP states in Section 4.1.3 (Well Purging), page 4-1 that “[t]otal purge volume will be determined by monitoring groundwater, pH, specific conductance, dissolved oxygen (DO) concentrations, oxidation-reduction potential (ORP) and temperature after every two gallons or each well volume, whichever is less, has been purged from the well.” The collection of dissolved oxygen (DO) was not mentioned in the Report nor was ORP mentioned in Section 3.0. In addition, the DO and ORP data were not reported in the tables found in Section 9, Tab 4 (Water Quality Measurements). Western must explain why this data was not collected. If the data was collected, this information must be included in the response to this letter. Western must ensure that DO and ORP data collected and reported in the next annual groundwater monitoring report.

Response:

Western inadvertently did not collect the DO and ORP data during the 2008 monitoring event. Western will ensure that DO and ORP data be collected and reported in all future annual groundwater monitoring reports.

Comment 11

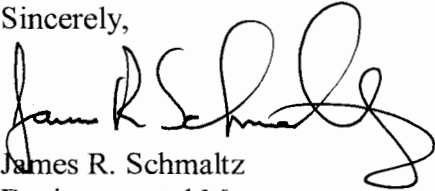
In Section 13 (Waste Disposition), the “Containers, Type” column has the following notations “DM, DF, CM, DT, CF, and TT” which are not defined. In the next annual groundwater monitoring report, Western must define these notations.

Response:

Table I – Types of Containers notation references the type of containers listed on the back of uniform Hazardous Waste manifests. Western has added the respective notations to Section 13 (Waste Disposition) and will include the definition of each notation on all future groundwater monitoring reports.

If you have questions or would like to discuss the revised work plan, please contact me at (505) 632-4171.

Sincerely,



James R. Schmaltz
Environmental Manager
Western Refining Southwest, Inc.
Bloomfield Refinery

cc: Hope Monzeglio – NMED HWB
Carl Chavez – NMOCD (w/attachment)
Dave Cobrain – NMED HWB
Todd Doyle – Western Refining – Bloomfield Refinery
Allen Hains – Western Refining El Paso Refinery

Water Quality Field Measurements

Seep #	Date	TDS (mg/L)	E.C. (umhos/cm)	pH	TEMP. (Fahrenheit)
Seep 1	Aug-08	2980	3851	7.03	81.9
	Apr-08	2849	3739	6.92	50.4
Seep 3	Aug-08	4206	5274	7.06	87.8
	Apr-08	NS ¹	NS ¹	NS ¹	NS ¹
Seep 6	Aug-08	7099	8469	6.96	72.3
	Apr-08	4827	5945	6.80	47.1
Seep 7	Aug-08	NS ¹	NS ¹	NS ¹	NS ¹
	Apr-08	4018	4870	6.60	60.5
Seep 9	Aug-08	NS ¹	NS ¹	NS ¹	NS ¹
	Apr-08	3561	4563	6.85	59.3

NS¹= Well is Dry or Not Enough Water to Sample- No Sample

NS² = Not Sampled due to approved Facility-Wide Monitoring Plan

NR¹= No Sample Required - Well Contains Separate Phase Hydrocarbon

NR² = No Sample Required per OCD and NMED pre-2007 Conditions

NWP = No Water Present

NPP = No Product Present

SECTION 9.0

TAB 4

PAGE 6

**Table 3
Facility-Wide Monitoring Program
Bloomfield Refinery - Western Refining Company**

Well ID	Sampling Frequency	VOCs (EPA Method 8260)	VOCs - Target List (EPA Method 8260) ¹	SVOCs (EPA Method 8270)	TPH - Diesel Range Organics (DRO) (EPA Method 8015B)	TPH - Gasoline Range Organics (GRO) (EPA Method 8015B)	Dissolved Metals (EPA Method 6010/7470)	Total Recoverable Metals - Target List (EPA Method 6010/7470)	Total Dissolved Solids (TDS) (EPA Method 160.1 or Field Measurement)	Specific Conductance (EPA Method 120.1 or Field Measurement)	Carbon Dioxide (EPA Method 310.1)	Alkalinity (EPA Method 310.1)	Anions (EPA Method 300.0)
REFINERY COMPLEX													
Background Wells													
MW-3	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-5	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-6	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
Refinery Wells													
RW-1	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-4	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-8	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
RW-9	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
RW-15	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
RW-18	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-20	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-21	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
RW-23	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
RW-28	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-29	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-30	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-31	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-40	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
RW-42	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
RW-43	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-44	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
Cross-Gradient Wells													
MW-1	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X

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MW-13	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-26	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-27	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-32	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-33	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
Downgradient Wells													
MW-11	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-12	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-34	Semi-Annually	Not Sampled											
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-35	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-37	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
MW-38	Semi-Annually		X		X	X							
	Annually	X		X	X	X	X	X	X	X	X	X	X
NORTH BARRIER WALL													
Collection Wells													
CW 0+60	Semi-Annually		X		X								
CW 25+95	Semi-Annually		X		X								
Observation Wells													
OW 0+60	Semi-Annually		X		X	X							
OW 1+50	Semi-Annually		X		X	X							
OW 3+85	Semi-Annually		X		X	X							
OW 5+50	Semi-Annually		X		X	X							
OW 6+70	Semi-Annually		X		X	X							
OW 8+10	Semi-Annually		X		X	X							
OW 11+15	Semi-Annually		X		X	X							
OW 14+10	Semi-Annually		X		X	X							
OW 16+60	Semi-Annually		X		X	X							
OW 19+50	Semi-Annually		X		X	X							
OW 22+00	Semi-Annually		X		X	X							
OW 23+10	Semi-Annually		X		X	X							
OW 23+90	Semi-Annually		X		X	X							
OW 25+70	Semi-Annually		X		X	X							
Sump Wells ⁽²⁾													
SW-1	Major Precipitation Event	<i>(No Sampling; Collection of Groundwater and SPH Levels Only)</i>											
SW-2	Major Precipitation Event	<i>(No Sampling; Collection of Groundwater and SPH Levels Only)</i>											
SW-3	Major Precipitation Event	<i>(No Sampling; Collection of Groundwater and SPH Levels Only)</i>											
SW-4	Major Precipitation Event	<i>(No Sampling; Collection of Groundwater and SPH Levels Only)</i>											

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Bloomfield Refinery - Western Refining Company**

Well ID	Sampling Frequency	VOCs (EPA Method 8260)	VOCs - Target List (EPA Method 8260) ¹	SVOCs (EPA Method 8270)	TPH - Diesel Range Organics (DRO) (EPA Method 8015B)	TPH - Gasoline Range Organics (GRO) (EPA Method 8015B)	Dissolved Metals (EPA Method 6010/7470)	Total Recoverable Metals - Target List (EPA Method 6010/7470)	Total Dissolved Solids (TDS) (EPA Method 160.1 or Field Measurement)	Specific Conductance (EPA Method 120.1 or Field Measurement)	Carbon Dioxide (EPA Method 310.1)	Alkalinity (EPA Method 310.1)	Anions (EPA Method 300.0)
SW-5	Major Precipitation Event	<i>(No Sampling; Collection of Groundwater and SPH Levels Only)</i>											
SW-6	Major Precipitation Event	<i>(No Sampling; Collection of Groundwater and SPH Levels Only)</i>											
SW-7	Major Precipitation Event	<i>(No Sampling; Collection of Groundwater and SPH Levels Only)</i>											
SAN JUAN RIVER BLUFF													
Outfalls													
Tank #33 (Outfall #1)	Quarterly		X										
Out Fall #2	Semi-Annually		X				X	X	X	X	X	X	X
Out Fall #3	Semi-Annually		X				X	X	X	X	X	X	X
Seeps													
Seep 1	Semi-Annually		X	X					X	X	X	X	X
Seep 2 ³	Semi-Annually		X	X					X	X	X	X	X
Seep 3 ³	Semi-Annually		X	X					X	X	X	X	X
Seep 4 ³	Semi-Annually		X	X					X	X	X	X	X
Seep 5 ³	Semi-Annually		X	X					X	X	X	X	X
Seep 6	Semi-Annually		X	X					X	X	X	X	X
Seep 7	Semi-Annually		X	X					X	X	X	X	X
Seep 8	Semi-Annually		X	X					X	X	X	X	X
Seep 9	Semi-Annually		X	X					X	X	X	X	X
SAN JUAN RIVER TERRACE													
Monitoring Wells													
MW-49	Quarterly		X		X	X		X					
	Annually							X					
DW-1	Quarterly		X		X	X		X					
	Annually							X					
Piezometers													
TP-1	Quarterly		X		X	X		X					
	Annually							X					
TP-2	Quarterly		X		X	X		X					
	Annually							X					
TP-3	Quarterly		X		X	X		X					
	Annually							X					
TP-5	Quarterly		X		X	X		X					
	Annually							X					
TP-6	Quarterly		X		X	X		X					
	Annually							X					
TP-7	Quarterly		X		X	X		X					
	Annually							X					
TP-8	Quarterly		X		X	X		X					
	Annually							X					
TP-9	Quarterly		X		X	X		X					
	Annually							X					
TP-10	Quarterly		X		X	X		X					
	Annually							X					
TP-11	Quarterly		X		X	X		X					
	Annually							X					
TP-12	Quarterly		X		X	X		X					
	Annually							X					
TP-13	Quarterly		X		X	X		X					
	Annually							X					

**Table 3
Facility-Wide Monitoring Program
Bloomfield Refinery - Western Refining Company**

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San Juan River													
Upstream	Semi-Annually		X		X	X	X	X	X	X		X	X
North of MW#46	Semi-Annually		X		X	X	X	X	X	X		X	X
North of MW#45	Semi-Annually		X		X	X	X	X	X	X		X	X
Downstream	Semi-Annually		X		X	X	X	X	X	X		X	X

Notes:

- VOC target list analytes for River Terrace sample are analyzed by EPA Method 8021B, as stated in Table 1 of NMED's letter dated April 18, 2007.
- Groundwater and SPH levels are monitored in each sump well following each major precipitation event (NMED, 2008).
- A sample will be collected at this location during a semi-annual sampling event if an active groundwater discharge is present (NME

Sump Well Fluids Monitoring June 2008

SECTION 9.0 TAB 3

Well ID	Date	Measuring Point Elevation	Total Well Depth	Depth To Product (DTP)	Depth To Water (DTW)	Corrected Groundwater Elevation	Separate Phase Hydrocarbon Thickness
SW1-0206	6/3/2008	5508.27	53.08	NPP	DRY		NPP
	6/16/2008	5508.27	53.08	NPP	DRY		NPP
	6/30/2008	5508.27	53.08	NPP	DRY		NPP
SW2-0206	6/3/2008	5507.75	27.69	NPP	DRY		NPP
	6/16/2008	5507.75	27.69	NPP	DRY		NPP
	6/30/2008	5507.75	27.69	NPP	DRY		NPP
SW3-0206	6/3/2008	5505.29	52.56	NPP	26.64	5478.65	NPP
	6/16/2008	5505.29	52.56	NPP	26.64	5478.65	NPP
	6/30/2008	5505.29	52.56	NPP	26.71	5478.58	NPP
SW4-0206	6/3/2008	5504.45	42.34	NPP	35.49	5468.96	NPP
	6/16/2008	5504.45	42.34	NPP	35.00	5469.45	NPP
	6/30/2008	5504.45	42.34	NPP	34.71	5469.74	NPP
SW5-0206	6/3/2008	5514.34	52.24	NPP	33.73	5480.61	NPP
	6/16/2008	5514.34	52.24	NPP	33.95	5480.39	NPP
	6/30/2008	5514.34	52.24	NPP	34.28	5480.06	NPP
SW6-0206	6/3/2008	5519.72	47.41	42.75	42.85	5476.95	0.10
	6/16/2008	5519.72	47.41	NPP	42.85	5476.87	NPP
	6/30/2008	5519.72	47.41	NPP	43.04	5476.68	NPP
SW7-0206	6/3/2008	5517.63	32.95	NPP	19.71	5497.92	NPP
	6/16/2008	5517.63	32.95	NPP	19.29	5498.34	NPP
	6/30/2008	5517.63	32.95	NPP	19.21	5498.42	NPP

NPP = No Product Present NWP = No Water Present

Background Wells

Groundwater Analysis - Total Metals

Sample Location	Date	EPA Method 6010B, EPA Method 7470: Mercury							
		Arsenic (mg/L)	Barium (mg/L)	Cadmium (mg/L)	Cr (mg/L)	Lead (mg/L)	Se (mg/L)	Silver (mg/L)	Mercury (mg/L)
		0.01	1	0.005	0.05	0.05	0.05	0.05	0.002
MW #3	Aug-08	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-07	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-06	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-05	NR ²	NR ²	NR ²	0.016	<0.005	NR ²	NR ²	NR ²
MW #5	Aug-08	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-07	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-06	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-05	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
MW #6	Aug-08	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-07	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-06	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹
	Aug-05	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹	NS ¹

40 CFR 141.102 MCL

NS¹ = Well is Dry or Not Enough Water to Sample- No Sample
 NS² = Not Sampled due to approved Facility-Wide Monitoring Plan
 NS³ = Sample Inadvertently not Collected this Sampling Event
 NR¹ = No Sample Required - Well Contains Separate Phase Hydrocarbon
 NR² = No Sample Required per OCD and NMED pre-2007 Conditions

SECTION 9.0 TAB 5
PAGE 3