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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 7, 2010

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

**RE: APPROVAL WITH MODIFICATIONS  
INVESTIGATION WORK PLAN GROUP 4  
WESTERN REFINING SOUTHWEST, INC., BLOOMFIELD REFINERY  
EPA ID# NMD089416416  
HWB-GRCB-09-001**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) has received Western Refining Southwest, Inc., Bloomfield Refinery's (Western) Revised *Investigation Work Plan Group 4 SWMU No. 7 Raw Water Ponds, SWMU No. 10 Fire Training Area, and SWMU No. 16 Active Landfill* (Work Plan), dated January 2010. NMED has reviewed the Work Plan and hereby issues this Approval with the following modifications.

**Comment 1**

The Work Plan divides the Solid Waste Management Units (SWMUs) into Sections (Section 2, 3, and 4). Each SWMU Section provides a Figures tab that includes the following figures: Figure 2 (SWMU Group No. 4 SWMU Locations), Figure 4 (Cross Section A-A' West to East), Figure 5 (Cross Section B-B' North to South), Figure 6 (April 2007 Potentiometric Surface), Figure 7 (Spring 2007 Separate Phase Hydrocarbon Thickness Map), and Figure 8 (Spring 2007 Dissolved-Phase Groundwater Data). In future Work Plans, Western may include Figures 2, 4, 5, 6, 7, and 8 with the general figures in Section 1 (Introduction) and each specific SWMU Section only needs to include figures that identify the sample locations specific to that SWMU.

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**Comment 2**

In Section 2.3.1 (Anticipated Activities), page 2-6, Western states “[b]ecause the Raw Water Ponds (former North Evaporation Pond) are currently used to store fresh water and penetration of the underlying liner could threaten the physical integrity of the ponds, Western has requested that investigation of the liner material and underlying soils be deferred at this time.”

NMED approves the deferral to investigate the Raw Water Ponds at this time. An investigation date will be established by NMED when Western nears completion of investigating the rest of the facility.

**Comment 3**

Section 3 addresses the investigation at SWMU No. 10 (Fire Training Area). Western must conduct the following during this investigation and revise the Work Plan accordingly:

- a. Figure 9 (SWMU No. 10 Sample Locations Map) of this Section has a square feature identified as a Liquid Fueled Training Station which proposes the locations of two borings located on the west and east side of the feature. The boring located on the east side of the feature must be moved to the north side of the feature (downgradient side).
- b. The proposed borings shown in Figure 9 in the vicinity of the Liquid Fueled Training Stations must be advanced within five feet of the structures.
- c. Western states on pages 3-3 and 3-4 that “[t]here are no subsurface features at the Fire Training Area with the exception of the fuel supply lines from the two aboveground storage tanks. There is no reason to believe the fuel supply lines have had any impact on contaminant distribution within the area. The underground lines are buried in permeable soils with native material backfilled around the lines.” Western provided no basis for this statement. In the Investigation Report, Western must explain the basis of the assertion that the fuel supply lines have not impacted this area and include a figure that provides the locations of all fuel lines associated with this SWMU.
- d. Western’s Response to NMED’s September 3, 2009 Notice of Disapproval Investigation Group 4 letter, Comment 19 (items a and b) indicates that borings were not located in a few areas where natural gas is used. In the Investigation Report, Western must provide a figure that shows any above or below ground piping associated with the areas containing natural gas as well as include a description that discusses the use and storage of natural gas at this SWMU.

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**Comment 4**

In Section 4.1 (Background), page 4-1, Western states “[t]he lateral extent of the [active] landfill is visibly obvious; however, the thickness of the material placed in the landfill is uncertain but is estimated to be 10 to 15 feet.”

The above statement does not provide the dimensions for the lateral extent of the Active Landfill. The Investigation Report must include the dimensions and a description of the lateral extent of the Active Landfill.

**Comment 5**

In Section 4.3.1 (Anticipated Activities), pages 4-3 and 4-4, Western states “...soil samples will be collected at SWMU No. 16 Active Landfill from the five soil borings shown on Figure 10. Soil borings will be installed to a minimum depth of ten feet and samples collected as discussed in Section 5.2 with samples collected from the following intervals: 0-6 (all borings); 18-24” (all boring); from the 6” interval at the top of saturation, if encountered; the sample from each boring with the greatest apparent degree of contamination, based on field observations and field screening; and any additional intervals as determined based on field screening results.”

For all boring locations drilled at the Active Landfill, Western must also collect a sample for analyses (as described in Section 5.8) from the native soil directly beneath the Active Landfill. The Investigation Report must also clarify that this SWMU is no longer in use and include when operations ceased.

**Comment 6**

In Section 5.2 (Soil Sampling), page 5-2, Western states “[the soil borings at the former South Evaporation Pond, Fire Training Area, and Active Landfill will be drilled to a minimum depth of ten feet, or five feet below the deepest detected contamination or waste material, whichever is deeper.” In Section 5.2.1 (SWMU No. 7) page 5-2, Western states “[t]hree soil borings will be drilled within the location of the former South Evaporation Pond, with one of these at the former location of the inlet to the pond, as shown on Figure 3. The borings will be continuously logged with samples collected for analysis from each discernable layer, including the underlying native soil. If there is only one soil type encountered in a soil boring (i.e., there are not separate discernable layers), then one soil sample will be collected for analysis from 0 to 6”.

The information provided in Section 5.2 for the South Evaporation Pond differs from that presented in Section 5.2.1. Western must apply both sampling approaches to the South Evaporation Pond with the following modification to Section 5.2.1: for all borings, a sample must also be collected directly from the total depth of the boring from native soil, regardless of the lack of discernable layers, in addition to the sample collected from the 0-to-6 inch interval.

**Comment 7**

In Section 5.8 (Chemical Analyses), page 5-11. Western states “[s]oil samples collected at SWMU No. 16 (Active Landfill), will be analyzed by SW-846 Method 8270 only if the results for motor oil range organics exceed 200 parts per million.”

Western must analyze soil samples for SW-846 Method 8270 if the individual or additive results for motor oil range organics and diesel range organics exceed 200 parts per million.

**Comment 8**

Western sent an email to NMED on May 26, 2010 that contained an attachment proposing changes to the QA/QC for Group 5. Western requested that if the QA/QC language was accepted by NMED, the changes also be applied to the Group 4 investigation Work Plan. NMED accepts the following QA/QC changes:

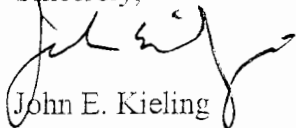
- a. For soils, Western must collect four field duplicate samples.
- b. For water, Western must collect field duplicate water samples obtained at a frequency of one sample per sampling event at permanent monitoring wells. Trip blanks must accompany laboratory sample bottles and shipping and storage containers intended for volatile organic compounds (VOC) analyses. The trip blanks must consist of a sample of analyte-free deionized water prepared by the laboratory and placed in an appropriate sample container. The trip blank must be prepared by the analytical laboratory prior to the sampling event and will be kept with the shipping containers and placed with other water samples obtained from the site each day. The trip blanks must be analyzed at a frequency of one per each shipping container of samples to be analyzed for VOCs.
- c. Pending field conditions, Western may choose to collect additional QA/QC samples.

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Western must adhere to all requirements in this Approval with Modifications. The Investigation Report must be submitted to NMED on or before **March 1, 2011**. OCD must be copied on all correspondence and be notified within one week prior to investigating the Active Landfill. NMED must be notified of the investigation activities in accordance with Section III.I of the July 27, 2007 Order.

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  
H. Monzeglio, NMED HWB  
C. Chavez, OCD  
A. Hains, Western El Paso  
File: GRCB 2009 and Reading  
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