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Reading file  
mailed  
7.26.10  
C.M.

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

July 26, 2010

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

**RE: APPROVAL WITH DIRECTION  
FACILITY-WIDE GROUNDWATER MONITORING  
WESTERN REFINING SOUTHWEST, INC., BLOOMFIELD REFINERY  
EPA ID# NMD089416416  
HWB-WRB-10-005**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) has reviewed Western Refining Southwest, Inc., Bloomfield Refinery's (Western) *Facility-Wide Groundwater Monitoring Plan* (FWGMP), dated June 2010. This FWGMP will replace the revised December 2007 Facility-Wide Groundwater Monitoring Plan. NMED hereby approves this FWGMP with the following direction.

**Comment 1**

In the Executive Summary, page E-4, Western states "[p]iping from Tank #38, which receives water from East Outfall #1, has been re-routed to discharge directly to the Refinery wastewater treatment system, upstream of the API; therefore no longer are samples collected at Tank #33 on a monthly basis."

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If the piping from Tank #38 is re-routed back to Tank #33 and the effluent is no longer routed through the refinery's wastewater treatment system, Western must resume monthly sampling at Tank 33 and notify NMED of this change within five business days.

**Comment 2**

In Section 4.1.3 (Well Purging), pages 4-1 and 4-2, Western states "[t]otal purge volume will be determined by monitoring groundwater pH, specific conductance, dissolved oxygen (DO) concentrations, oxidation-reduction potential, and/or temperature after every two gallons or each well volume, whichever is less, has been purged from the well...Purging will continue, as needed until the field parameter readings stabilize to within 10 %, purging will stop and the well is ready for sample collection...Well purging and sampling will be performed using disposable bailers and/or appropriate sampling pumps."

Western must ensure that a minimum of three well volumes are purged from the well before the collection of a groundwater sample unless all field parameters stabilize for three consecutive measurements. The water quality parameters must also be collected consistently at each well to allow comparisons to be made between samples and from well to well. This practice must be followed in all future groundwater sampling events.

**Comment 3**

In Section 5.1.1 (Sampling Locations), page 5-2, Western states "[a]ny sump wells where [separate phase hydrocarbon] SPH is present will be evacuated to prevent releases along the river bluff."

If Western detects greater than one foot of SPH in any sump wells, NMED and the Oil Conservation Division (OCD) must be notified within five business days.

**Comment 4**

In the "NOTES" portion of Table 2 (Analytical Methods and Target Analytes), note (1) states "VOCs Target List For River Terrace samples are analyzed by EPA Method 8021B Per Table 1 of NMED's Letter Dated April 18, 2007."

The letter which contains the River Terrace VOC Target List for the River Terrace Samples and the analytical requirements at the River Terrace is found in NMED's June 10, 2010 Approval with Direction. Western must revise Table 2 to reference NMED's June 10, 2010 letter and submit a replacement Table.

**Comment 5**

It is not clear from Table 2 (Analytical Methods and Target Analytes) or Table 3 (Facility-Wide Monitoring Program) which monitoring and temporary wells at the San Juan River Terrace will analyze for metals on an annual basis, without the assistance of the River Terrace Monitoring

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requirements outlined in Attachment 1, Table 1 (Groundwater Monitoring) of NMED's June 10, 2010 letter. Western must revise Table 2 and 3 to clarify this discrepancy and submit replacement Tables accordingly.

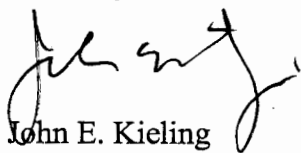
**Comment 6**

Table 2 (Analytical Methods and Target Analytes), under Total Recoverable Metals (EPA Method 6010B/7470) states "-Target List \* (For Annual River Terrace Sampling)."

The meaning of the asterisk is not clear. Western must revise Table 2 to clarify the meaning of the asterisk or remove it from the table. Western must submit a replacement Table.

Western must submit replacement pages as stated in Comments 4, 5 and 6 to NMED on or before August 27, 2010. Responses to the other comments are unnecessary. The replacement pages must be accompanied with a response letter that details where all revisions have been made cross referencing NMED's numbered comments. Western must follow all directives identified in this letter. As a reminder, the annual revisions to the FWGMP must be submitted annually to NMED and OCD by June 30<sup>th</sup> of each respective year. 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  
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File: WRB and Reading 2010  
HWB-WRB-10-005