

August 25, 2011

John E. Kieling, Acting Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, NM 87505



Certified Mailer #: 7010 3090 0001 3450 2630

Re: Response to June 7, 2011 APPROVAL WITH MODIFICATIONS
Investigation Work Plan Group 8
Western Refining Southwest, Inc., Bloomfield Refinery
EPA ID# NMD089416416
HWB-WRB-10-008

Dear Mr. Kieling:

Western Refining Southwest, Inc., Bloomfield Refinery has prepared the following responses to your comments received on the referenced investigation work plan.

NMED Comment 1 - Section 5.2 (Soil Sampling), page 12:

- a) Clarify why the wastewater line that runs along the south side of the Raw Water Pond would not be susceptible to degradation or damage.
- b) Explain how it was determined there were no indications of historical releases along the pipeline that was removed (e.g., visual and olfactory examinations).
- c) Submit replacement page(s) responding to items a and b above.

Response to Comment 1:

- a) The discussion in Section 5.2 explains the reasoning used to select potential soil boring locations along the underground piping. As stated on page 11, "The locations most likely to have releases from underground piping include pipe connections (e.g., fittings and valves) and areas most likely to result in corrosion of steel lines (e.g., locations with corrosive soils)." The discussion in the second paragraph on page 12 explains that the wastewater line that runs along the south side of the Raw Water Pond is a PVC pipeline and thus is not susceptible to corrosion like a steel pipeline would be in an area of potentially high soil moisture levels. Therefore, as stated in the first sentence of the second paragraph on page 12, "The proposed soil boring locations are concentrated at pipeline connections." Regarding potential damage to the PVC line on the south side of the Raw Water Pond, the pipeline is buried a minimum depth of four feet to reduce any potential for damage to the line. The text in Section 5.2 (page 12, second paragraph) has been revised to stress that there were no historic steel lines near the Raw Water Ponds and to discuss the potential for damage to the PVC pipeline.
- b) When the new steel line was installed on the western side of the Raw Water Pond, the previously existing PVC line was fully excavated and removed. During this process, there were no indications of releases from the line (e.g., areas with abnormally high soil moisture levels, any presence of petroleum hydrocarbon odors, or stained soils). The text in the second paragraph on page 12 has been revised to

further clarify the discussion on potential indications of historical releases from this pipeline.

- c) Replacements are enclosed for pages 12 through 17. Changes were only made to the second paragraph of page 12 but the additional text caused a shift that carries through page 17. A revised table of contents is also provided, as some of the subsections shifted onto another page.

NMED Comment 2 - Section 5.2 (Soil Sampling), page 12, paragraph 2:

Borings to be installed near the inactive underground piping must be installed within three feet instead of five feet, if possible. This must be documented in the Investigation Report.

Response to Comment 2:

Borings to be completed near inactive underground pipelines will be installed within three feet of the inactive line where possible. This will be documented in the Investigation Report.

NMED Comment 3 - Figures

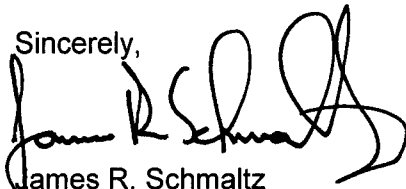
- a) *NMED has added additional soil boring locations to Figure 9 (see attached Figure 9).*
- b) *The legend in Figures 2 and 9 contain dotted green lines that states "Under Ground Wastewater Piping (SWMU No. 3)." As written this could indicate that SWMU 3 only consists of underground wastewater piping. SWMU No. 3 also includes underground piping associated with the transfer of product, the above ground storage tank farm, and the wastewater treatment system as described in the July 2007 Order. Revise the legends of Figures 2 and 9 to indentify all aspects of SWMU 3.*
- c) *Submit replacement figures with the required changes described in items a and b above.*

Response to Comment 3:

- a. Figure 9 has been revised to include the four additional borings.
- b. The legends of Figures 2 and 9 have been revised to show the various symbols used to indicate the different types of underground piping associated with SWMU 3 (i.e., hydrocarbon piping and wastewater piping).
- c. Revised Figures 2 and 9 are enclosed.

If you have questions regarding the above responses or the enclosures, please contact me at (505) 632-4171.

Sincerely,



James R. Schmaltz
Health, Safety, Environmental, and Regulatory Director
Western Refining Southwest, Inc. - Bloomfield Refinery

cc: Dave Cobrain – NMED HWB
Leona Tsinnajinnie – NMED HWB
Carl Chavez - NMOCD
Allen Hains – Western Refining El Paso
Scott Crouch - RPS