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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 4, 2011

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

**RE: APPROVAL WITH MODIFICATIONS
INVESTIGATION REPORT GROUP 5 (SWMU NO. 15 TANK FARM AREA)
WESTERN REFINING SOUTHWEST INC., BLOOMFIELD REFINERY
EPA ID# NMD089416416
HWB-WRB-11-006**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) has received Western Refining Southwest, Inc., Bloomfield Refinery's (Western) *Investigation Report Group 5 (SWMU No. 5 Tank Farm Area)* (Report) dated July 2011. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

1. Section 3.2 (Background Information Research), page 9:

Western's Statement: "[d]ocuments containing the results of previous investigations and subsequent routine groundwater monitoring data from monitoring wells were reviewed to facilitate development of the Group 5 Investigation Work Plan. The previously collected data provides valuable information on the overall subsurface conditions, including hydrogeology and contaminant distribution within groundwater. The data collected under this investigation supplements the historical groundwater data and provide SWMU-specific information regarding contaminant occurrence and distribution within soils and groundwater."

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NMED's Comment: In future work plans and reports, provide references and citations for all investigations used as background information for work plans and reports. Provide the reference for the investigation mentioned in the statement in a response letter.

2. Section 4.3 (Exploratory Drilling Investigations, Soil Sampling and Boring Abandonment, SWMU 15-12), page 17:

Western's Statement: "[t]he PID readings were low (2.3-3.2 ppm) over the upper eight feet but increased to 280 in the 10 to 12' interval and reached a maximum value of 1,325 ppm in the 14 – 16' interval. The PID reading decreased to 235 ppm in the 18 to 20' interval."

NMED's Comment: The 18-20 foot depth exhibited a PID reading of 235, but Western did not continue to advance the boring past this depth. In the response letter, explain why the boring was not advanced deeper than 20 feet or until the Nacimiento Formation was encountered. In all future investigations, if the field screening evidence indicates increasing or relatively high levels of contamination, Western must continue to advance the soil boring beneath the water table, until field screening indicates decreasing contaminant levels or until the drilling equipment hits refusal, or explain why drilling was discontinued.

3. Section 4.3 (Exploratory Drilling Investigations, Soil Sampling and Boring Abandonment, SWMU 15-13), page 17:

Western's Statement: "[a] maximum PID reading of 1,727 ppm was recorded from a depth of 12 to 14'. A silt deposit present from the land surface to a depth of eight feet graded to clayey silt, which persisted to a depth of 12' bgl. Silty sand is present from 12 to 16' bgl and grades to gravelly sand, which continued to the termination depth of 28' bgl."

NMED's Comment: Detected VOC concentrations decreased with depth in several of the borings exhibiting high PID readings. In the response letter, state whether or not boring SWMU 15-13 followed this same trend. In future work plans and reports, include discussions of all field screening information in the appropriate sections of the documents.

4. Section 7.2 (Recommendations), page 40:

NMED Comment: Western recommends reassessing the analytical data from the SWMU No. 15 investigation with the background values established by the background study that was completed in the summer of 2011. Western recommends additional delineation in the vicinity of soil boring locations SWMU 15-6, 15-11, 15-12, and 15-13. Western must provide a work plan to conduct additional investigation at SWMU 15. At a minimum, the work plan must propose additional investigation to the water table beneath the site and must propose the collection of soil samples for analysis of volatile organic compounds (VOCs), semi-volatile organic compounds

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(SVOCs), Skinner List Metals, diesel range organics (DRO), gasoline range organics (GRO), motor oil range organics (MRO), and general chemistry. In addition, if groundwater is encountered, groundwater samples must be collected and analyzed with the same analytical suite as the soil samples as well as cyanide, and dissolved iron and manganese. If separate phase hydrocarbons are encountered, Western must collect a sample for fuel fingerprint analysis to characterize the product.

5. Section 7.2 (Recommendations), page 41:

Western's Statement: "[w]ith the combination of groundwater data collected from previously existing wells and the new groundwater samples recently collected, the impacts to groundwater within the tank farm have been adequately characterized to support final remedy selection. No further investigation of groundwater within the tank farm is recommended at this time."

NMED's Comment: Western asserts that previous and current data have adequately characterized the groundwater in the SWMU that supports their final remedy. However, Western does not discuss a remedy or reference a submittal with plans for a remedy. Provide a discussion regarding potential remedies in the response letter.

6. Table 1 (Historical Subsurface Soil Vapor Concentrations):

NMED's Comment: Western provides a table summarizing the historical subsurface soil vapor concentrations from a previous investigation, but a reference document is not cited. Provide replacement pages for the tables with the response letter that provides the reference in the table notes.

7. Table 2 (Historical Groundwater Analyses):

NMED's Comment: Table 2 provides a summary of the historical groundwater data. In several cells of the table, "--" was not defined. In future documents, define all symbols in all tables.

8. Table 3 (Group 5 Soil Boring Samples – Vapor Screening Results):

NMED's Comment: Western provides a summary of the soil boring sample vapor screening results but it is not clear when these screening results were collected. In future work plans and reports, provide collection dates for the screening data and include a note identifying the instrument and its detection range used to collect the screening level readings.

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9. Figures 4 (Cross Section A-A', West to East), 5 (Cross Section B-B', North to South), and 6 (Cross Section C-C', North to South):

NMED's Comment: Figures 4, 5, and 6 are missing screened intervals for the following monitoring wells, MW-1, MW-3, MW-5, MW-6, MW-41, MW-42, MW-44, MW-52, and RW-42. Provide replacement pages with the missing information and ensure all well information is available on all figures in future documents.

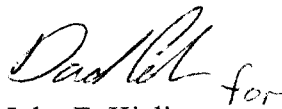
10. Appendix B (Survey Data):

NMED's Comment: Appendix B provides survey data for the soil borings and new monitoring wells from the investigation. However, in Section 3.4 (Surveys), Western does not discuss the survey point locations for the new monitoring wells (e.g., north side of the PVC casing or the highest location on the PVC casing). In future documents, Western must describe the location of the measuring points for all monitoring wells.

Western must address all comments required by this Approval with Modifications. A letter containing the required responses and replacement pages must be submitted to NMED on or before **February 13, 2012**. Western must submit a work plan for the additional investigations to NMED on or before **March 19, 2012**.

If you have any questions regarding this letter, please contact Leona Tsinnajinnie of my staff at (505) 476-6057.

Sincerely,



John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
C. Chavez, OCD
A. Hains, Western Refining Company, El Paso, Texas

File: HWB-WRB-11-006 and Reading 2011