

March 15, 2012

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



UPS Tracking #: 1Z F9F 647 25 9311 3809

Re: Supplemental Response to NMED's Approval with Modifications
Group 5 Investigation Report (June 2011)
Western Refining Southwest, Inc., Bloomfield Refinery
EPA ID# NMD089416416

Dear Mr. Kieling:

Pursuant to your Approval with Modifications letter dated November 4, 2011, Western Refining Southwest, Inc., Bloomfield Refinery ("Western") has prepared the following response to comment No. 4. In our initial response dated February 9, 2012, Western indicated that a Phase II Investigation Work Plan would be submitted for Group 5; however, as explained below Western believes it would premature to submit the Phase II Investigation Work Plan for Group 5 at this time.

NMED Comment 4 - Section 7.2 (Recommendations), page 40:

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 (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.

Western Response No. 4: Western is requesting that submittal of the Phase II Investigation Work Plan for Group 5 (SWMU 15) be postponed at this time. It will be more productive to conduct Phase II investigations for the RFI Groups, including Group 5, after the initial investigations and associated reports have been completed for all of the RFI Groups. This will allow time to establish site-specific background concentrations, which may affect subsequent investigation requirements. In addition, information obtained from other initial RFI Group investigations may affect data acquisition requirements in nearby RFI Groups. Conducting a comprehensive Phase II investigation across the facility will

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facilitate remedy selection for any impacted areas that extend across multiple SWMUs/AOCs (e.g., impacts in shallow groundwater).

If you have questions, then please contact me at (505) 632-4171.

Sincerely,

P.P. Kelly Robinson on behalf of,

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

Enclosure

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