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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

September 17, 2012

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

**RE: APPROVAL  
RIVER TERRACE VOLUNTARY CORRECTIVE MEASURES  
BIOVENTING SYSTEM ANNUAL REPORT  
(JANUARY – DECEMBER 2011), MARCH 2012  
WESTERN REFINING SOUTHWEST INC., BLOOMFIELD REFINERY  
EPA ID# NMD089416416  
HWB-WRB-12-001**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) has received Western Refining Southwest, Inc., Bloomfield Refinery's (Western) *River Terrace Voluntary Corrective Measures Bioventing System Annual Report (January – December 2011)* (Report) dated March 2012. NMED has reviewed the Report and hereby issues this Approval with the following comments.

**Comment 1**

The following comments pertain to Table 2 (Groundwater Monitoring Data Summary – 2011):

- a. On page 2 of 14 in the "Toluene" column, Western highlighted several data results for TP-2 that are below the screening level, 0.75 mg/L.
- b. On page 4 of 14 in the "Ethylbenzene" column, Western highlighted a data result for TP-5 for the High Flow 2011 sampling event that is below the screening level, 0.7 mg/L.
- c. On page 5 of 14 in the "Benzene" column, Western did not highlight a data result for TP-6 for the 4<sup>th</sup> Quarter 2006 sampling event that is above the screening level, 0.005 mg/L.
- d. On page 7 of 14 in the "Toluene" column, there is an extra significant digit reported for the data result for the 4<sup>th</sup> Quarter 2010 sampling event for TP-8.
- e. On page 8 of 14 in the "MTBE" and "Lead" columns, Western did not highlight data results for TP-9 for the Baseline and 4<sup>th</sup> Quarter 2009 sampling events that are above their respective screening levels (0.012 mg/L and 0.015 mg/L).
- f. On pages 12 and 13 of 14 in the "Lead" column, Western highlighted data results for TP-13 and DW-1 that are below the screening level, 0.015 mg/L.
- g. In several of the data table results, Western has an asterisk next to a data result but does not define it in the "Notes" section of the table.

In future work plans and reports, review data tables to ensure the correct information is highlighted and that all symbols, highlighting, and formatting are defined in the "Notes" section of the data tables.

### **Comment 2**

In Table 4 (GAC Filter Monitoring – 2011), the GAC-Lead analytical results in the "TPH-DRO" column are transposed. According to the analytical results in Appendix D (Analytical Reports), the January 17, 2011 analytical result is ND < 0.2 mg/L and the February 10, 2011 analytical result is 0.4 mg/L. Provide a replacement page for Table 4 and check the data tables to ensure the correct analytical result is provided for the sample event date. If any other data tables are found to be incorrect, provide a replacement page for them as well.

### **Comment 3**

In the Figures section, Western provides Figure 2 (Facility Site Plan) that depicts the entire refinery. In future work plans and reports, Western must highlight the investigation area to help the reader identify its location. No revision is necessary.

R. Schmaltz  
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**Comment 4**

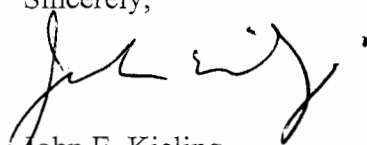
In Appendix A (Regulatory Criteria/Groundwater Clean-up Standards), Western has attached NMED's *Risk Assessment Guidance for Site Investigation and Remediation, February 2012* as a reference for screening levels. The guidance document was revised in June 2012. Use the revised guidance document in future work plans and reports and check the NMED website for updates to the guidance document. No revision is necessary.

**Comment 5**

In Appendix C, Western includes Hall Environmental Analysis Laboratory's *Quality Assurance Plan, Revision 9.4*. Western is reminded that NMED does not review or approve Quality Assurance Plans. Approval of this Work Plan does not constitute approval of the Quality Assurance Plan. No revision is necessary.

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

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

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

File: HWB-WRB-12-001 and Reading 2012