



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)



RYAN FLYNN  
Cabinet Secretary-Designate

BUTCH TONGATE  
Deputy Secretary

THOMAS SKIBITSKI  
Acting Director  
Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 8, 2013

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

**RE: APPROVAL  
INVESTIGATION REPORT GROUP 8 (SWMU NO. 3 UNDERGROUND  
PIPING CURRENTLY IN USE AND SWMU NO. 6 ABANDONED  
UNDERGROUND PIPING), JUNE 2012  
WESTERN REFINING SOUTHWEST INC., BLOOMFIELD REFINERY  
EPA ID# NMD089416416  
HWB-WRB-12-004**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) has received Western Refining Southwest, Inc., Bloomfield Refinery's (Western) *Investigation Report Group 8 (SWMU No. 3 Underground Piping Currently in Use and SWMU No. 6 Abandoned Underground Piping)* (Report) dated June 2012. NMED has reviewed the Report and hereby issues this Approval with the following comments.

**1. Section 3.1 (Soil Boring Installation and Sample Collection), page 9, paragraph 2:**

**Western's Statement:** "NMED was contacted on February 2, 1012 to request changes to the proposed scope of work."

**NMED's Comment:** There is a typographical error in reporting the date of the correspondence with NMED. Western meant 2012. No revision is necessary.

**2. Section 3.1 (Soil Boring Installation and Sample Collection), SWMU 6-1, 6-2, and 6-3, page 11, paragraph 1:**

**Western's Statement:** "[a] 10-foot deep hydro-excavated trench extending north approximately 20 feet from the piping manifold south of Tank 13 feet did not reveal any underground piping in the area."

**NMED's Comment:** There appears to be a typographical error in this statement. It is unclear if Western is referencing "Tank 13" or describing a distance of "13 feet" and did not report the tank number. Clarify the statement and provide a replacement page with the correct information.

**3. Section 5 (Regulatory Criteria), page 29, paragraph 3:**

**Western's Statement:** "[b]ecause the specific type of products (e.g., diesel fuel or jet fuel) that were potentially released from the various underground pipelines is not always known, "unknown oil" was selected from Table 6-2 for comparison to the diesel range analytical results. There are no screening levels for comparison to results reported in the gasoline range, but rather individual constituents (e.g., [benzene, toluene, ethylbenzene, and xylene (BTEX)]) are evaluated."

**NMED's Comment:** There appears to be a typographical error associated with the statement that "[t]here are no screening levels for comparison to results reported in the gasoline range" because in Table 3 (Ground Water Analytical Results Summary), Western reports a screening level of 1.34 mg/L for #3 and #6 fuel oils from the NMED Total Petroleum Hydrocarbons (TPH) Screening Guidelines (October 2006) Table 2a (TPH Screening Guidelines for Potable Groundwater (GW-1)) to compare to the gasoline range organics (GRO) data results. In addition, NMED reviewed the 2006 drinking water standards from the Massachusetts Department of Environmental Protection (MADEP) website and did not find screening levels equivalent to the #3 and #6 fuel oils screening levels found in NMED's TPH guidance documents. Explain why the #3 and #6 fuel oils screening level was chosen to evaluate the GRO data and provide replacement pages that contain the discussion in the appropriate sections of the Report and future reports.

**4. Section 6.1 (Soil Sampling Chemical Analytical Results), SWMU No. 6 Abandoned Underground Piping, page 34, paragraph 2:**

**Western's Statement:** "[s]oil boring SWMU 15-3 is located along an active underground hydrocarbon pipeline but is also near the end of an abandoned underground hydrocarbon pipeline. Arsenic and chromium were the only constituents detected at concentrations above the screening levels from this location in a sample collected from 0.5 to 2'. The arsenic and chromium results are discussed above under SWMU No. 3."

**NMED's Comment:** The chromium results for soil boring SWMU 15-3 are not discussed in the referenced section above. In future reports, discuss relevant samples in the appropriate sections. No revision is necessary.

**5. Section 7.2 (Recommendations), page 38, paragraph 2:**

**Western's Statement:** "[a]fter background values have been established, the site data for arsenic, chromium, and cobalt should be reassessed to determine if some analytical results are actually representative of background conditions and not site-related impacts. If some of the highest chromium values exceed background concentrations, then these locations may need to be reassessed to determine if chromium in soils is present as chromium III or VI."

**NMED's Comment:** Past investigations have stated the need to speciate chromium but Western has not proposed methods for speciating chromium at the facility and when it will be carried out. Briefly explain the method Western plans to use to speciate chromium at the facility and propose a schedule to complete the task, if appropriate.

**6. Section 7.2 (Recommendations), page 38, paragraph 3:**

**Western's Statement:** "[t]he sampling data does not indicate any releases from the underground pipelines investigated as part of Group 8. Western recommends that SWMUs 3 and 6 be approved for Corrective Action Complete [(CAC)] Without Controls once a demonstration is made that chromium does not pose an unacceptable threat."

**NMED Comment:** NMED does not believe that a Corrective Action Complete without Controls determination is possible for the Group 8 SWMUs at this time because groundwater contamination is present beneath the sites and the underground piping at SWMU 3 remains in use. Western has demonstrated that no further work is warranted for SWMUs 3 and 6 and may petition for a Corrective Action Complete with Controls determination, which would include the continuation of groundwater monitoring at the facility and maintaining and testing the active underground pipelines at SWMU 3 throughout the duration of their use. Any future releases from SWMU 3 will be addressed at that time.

**7. Table 1 (Description and Inspection Schedule of Underground Pipelines):**

**NMED's Comment:** Revise Table 1 to address the typographical errors and missing information as listed in the comments below:

- a. "Effluent," "Hydrotest," "Naptha," "Premium," "Gasoline," "Nozzle," and "Unleaded" are misspelled in Table 1.
- b. Provide a footnote section at the end of the Table 1 to define all symbols and blank cells.
- c. Include a section on the table that provides the installation date for the pipelines and the out of service date.
- d. Define LPG, ULSD, VRU, and DHT in the footnote section of Table 1.

**8. Tables 2 (Existing Soil Analytical Results) and 7 (Group 8 Soil Analytical Results Summary):**

**NMED's Comment:** Revise Tables 2 and 7 to address the typographical errors and missing information as listed in the comments below:

- a. In the footnote section of Tables 2 and 7, Western defines bolded values that were above non-residential screening levels and yellow highlighted values that were above the leachate (DAF) screening levels. The chromium VI results included highlighted and bolded values that were above the DAF and residential screening levels. Apply the appropriate formats in the revised table.
- b. 1,2,4-trimethylbenzene is missing from Table 2.
- c. There are two sets of volatile organic compound (VOC) data in Table 2; however, the units for the first set appear to be mislabeled as "mg/kg" instead of "mg/kg-dry." Provide the correct units or explain why there are two sets of VOC data in the table and, if appropriate, provide a revised table.
- d. "Unknown" is misspelled in the footnote section of both tables.

**9. Table 3 (Ground Water Analytical Results Summary):**

**NMED's Comment:** Table 3 does not define all symbols and highlights in the table. Provide these definitions in the revised table.

R. Schmaltz  
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**10. Appendix H (Quality Assurance/Quality Control Review), Section 2.7(MS/MSD Recovery and Relative Percent Difference), bullet 2:**

**Western's Statement:** "[i]f the MS or MSD recovery for an analyte was above acceptance limits and the analyte was detected in the associated analytical batch, then analyte results were qualified "J+" to account for a potential low bias."

**NMED's Comment:** There is a typographical error in reporting the "J" qualified information. "J+" is qualified to account for a potential high bias and "J-" for a potential low bias. In future reports, ensure the correct information is presented in their appropriate sections.

Western must address all comments where a response is required by this Approval. A response letter and replacement pages must be submitted to NMED by **August 8, 2013**.

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  
N. Dhawan, NMED HWB  
L. Tsinnajinnie, NMED HWB  
C. Chavez, OCD  
A. Hains, Western Refining Company, El Paso, Texas  
K. Robinson, Western Refining Company, Bloomfield, NM

File: HWB-WRB-12-004 and Reading 2013