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**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

June 15, 2015

Mr. Randy Schmaltz  
Health, Safety, Environmental, and  
Regulatory Director  
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 2013), MARCH 2014  
WESTERN REFINING SOUTHWEST INC., BLOOMFIELD REFINERY  
EPA ID# NMD089416416  
HWB-WRB-14-001**

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 2013)* (Report) dated March 2014. NMED has reviewed the Report and hereby issues this Approval with the following comments.

**Comment 1**

In Section 2 (Background), Western chronologically summarizes events and activities conducted at the River Terrace Area since 1999. In future reports, include dates/years when wells were removed from the monitoring program and briefly summarize the reason the wells were removed from the monitoring program. No revision required.

### **Comment 2**

In Section 3.3.1 (GAC Sampling), page 10, paragraph 3, Western states that “[s]amples were inadvertently not analyzed for MTBE in January, February, and September [and] TPH-GRO was inadvertently no[t] analyzed in August 2013.” Additionally, in the *2012 River Terrace Voluntary Corrective Measures Bioventing System Annual Report*, some soil gas samples were not collected and some constituents were not analyzed. In future reports, Western must ensure that all samples are collected and analyzed for the correct constituents and reported as required in the corresponding NMED-approved monitoring plans, reports, and letters.

### **Comment 3**

Section 4 (Recommendations), page 14, paragraph 1, Western requests to discontinue groundwater monitoring activities at the eastside of the River Terrace, which includes piezometers TP-3, TP-10, TP-11, TP-12 and TP-13. Groundwater analytical results for these piezometers have been reported as non-detect or below screening levels since 2009, with the exception of one lead exceedance reported for TP-3 during the fourth quarter sampling in 2009. NMED hereby approves Western’s request to discontinue groundwater sampling at piezometers TP-3, TP-10, TP-11, TP-12 and TP-13; however, Western must continue to measure and report groundwater elevations at these locations and may be required to sample these piezometers in the future.

### **Comment 4**

Section 4 (Recommendations), page 14, paragraph 2, Western requests to discontinue soil gas monitoring at the River Terrace System. Western states that the “air samples do not show any additional information outside of the groundwater results.” NMED has reviewed Tables 1 (2013 Soil Gas Monitoring Summary) and 2 (2013 Groundwater Monitoring Data Summary) and agrees that the soil gas analytical results do not provide any additional information regarding subsurface conditions at the River Terrace. NMED hereby approves Western’s request to discontinue soil gas monitoring at the River Terrace System.

### **Comment 5**

Section 4 (Recommendations), page 14, paragraph 3, Western states that “there is no immediate need to replace TP-2 with an additional well” because the proposed monitoring extent is defined as a smaller area. NMED agrees that TP-2 does not need to be replaced. The barrier wall continues to prevent hydrocarbons from migrating from the Facility towards the San Juan River. DW-3 will be utilized as the sampling point for the southwest corner of the River Terrace and if the need arises, NMED may evaluate the installation of additional monitoring wells in the future.

### **Comment 6**

Figures 5 (Groundwater BTEX Concentration Map) and 6 (Soil Vapor BTEX Concentration Map) report the BTEX concentrations for groundwater and soil vapor at the River Terrace. In

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the future, also provide additional figures that report the DRO concentrations for all sampled wells.

**Comment 7**

In Appendix A (Regulatory Criteria/Groundwater Clean-up Standards), Western attached NMED's *Risk Assessment Guidance for Site Investigation and Remediation, February 2012* as a reference for screening levels. At the time of the submittal, the most recent guidance document was revised in June 2012 and NMED recently updated the guidance in December 2014. Use the most recent guidance document in future work plans and reports and check the NMED website for updates to the guidance document. No revision is required.

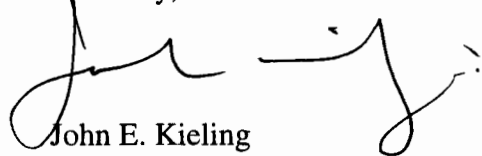
**Comment 8**

In Appendix C, Western includes Hall Environmental Analysis Laboratory's *Quality Assurance Plan, Revision 9.7*. NMED does not review or approve contract laboratory Quality Assurance Plans. Approval of this Report does not constitute approval of the Quality Assurance Plan. No revision required.

Western must apply these comments from this Approval to all future River Terrace Annual Reports, as applicable. In addition, comments from the June 15, 2015 Approval with Modifications letter for the *2014 Facility-Wide Groundwater Monitoring Plan* must be incorporated in all future River Terrace Annual Reports.

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  
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