



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

MAR 02 2020

Gregory J. McCartney, P.E.
Project Manager
Western Refining Southwest, Inc.
Bloomfield Terminal
P.O. Box 159
Bloomfield, New Mexico 87413

**RE: APPROVAL WITH MODIFICATION
INVESTIGATION WORK PLAN MAY 17, 2018 SLOP OIL LINE RELEASE
SWMU NO. 3 UNDERGROUND PIPING CURRENTLY IN USE, OCTOBER 2018
WESTERN REFINING SOUTHWEST, INC. – BLOOMFIELD TERMINAL
BLOOMFIELD, NEW MEXICO
EPA ID NO. NMD089416416
HWB-WRB-18-004**

Dear Mr. McCartney:

The New Mexico Environment Department (NMED) has received Western Refining Southwest, Inc., Bloomfield Terminal's (Western) *Investigation Work Plan Underground Slop Pipeline Release – May 18, 2018* (Work Plan) dated October 10, 2018. NMED has reviewed the Work Plan and hereby issues this Approval with the following modifications.

Comment 1

In Section 2 (Background), page 2-3, Western describes the release that occurred from the slop oil pipeline. Provide the following information:

- a. According to the description, Western removed 285 cubic yards of soil but did not report whether liquid was removed from the site. Report the amount of liquid removed from the site in the response letter and the final C-141.

- b. Based on the original e-mailed notifications on May 18, 2019, the release was identified by visual inspection. State whether there were other types of indicators that were used to identify the release in the response letter.
- c. Along with the C-141, several photographs have been provided that showed the area where the release occurred as well as the open trench with the exposed pipelines. However, Western has not provided a scaled figure that includes the dimensions of the open trench or the depth that the soil was excavated. Provide a scaled figure with the dimensions of the open trench with the response letter.
- d. In an e-mail dated June 19, 2018, Western provided results for three composite soil samples and a picture of the open trench. Western did not provide a figure with the locations that the samples were collected. Furthermore, Western did not provide the sample depths or the rationale for the sample locations. Provide a scaled figure with the sample locations as well as discuss the reasons for the selected sample locations in the response letter. Also provide the sample depths in the response letter.

Comment 2

Section 5.2 (Soil Sampling), pages 5-1 to 5-3, Western discusses the soil sampling method and procedures and proposes to collect soil samples from four soil borings “to a minimum depth of six feet below the pipeline or to the vertical extent of any observed impacts.” Figure 9 (Sample Location Map) depicts the excavation location and the four proposed soil sample locations. The soil sample locations appear to be too far away from the pipeline on the north side, and it is unclear why the soil sample locations are located so far north of the release site. Propose to include two additional soil sample locations with the following:

- a. The additional soil samples must be collected between the southern limit of the excavation and the two proposed southern soil sample locations depicted on Figure 9. Provide a revised Figure 9 that includes the added sample locations with the response letter.
- b. All soil samples must be collected within three to five feet laterally from the excavation boundary. These soil samples should laterally delineate the extent of the release as well as determine if the release migrated below the pipelines.

Comment 3

Section 5.3 (Groundwater Water Monitoring), page 5-4, Western states that “no groundwater samples are proposed under this Scope of Work.” However, Western did not state how long the pipeline may have been leaking. It is possible that the release may have been leaking for some time and may have migrated to groundwater. Furthermore, Table 2 (Ground Water

Analytical Results Summary) did not include monitoring wells MW-30 and MW-44 which are located east of the release. Include data from these two monitoring wells with the report and provide a discussion if the analytical data indicates that the release migrated into the groundwater.

Western must address all comments where a response is required by this Approval with Modifications. A response letter with the required figures must be submitted to NMED on or before **May 15, 2020**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

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

Sincerely,



Kevin Pierard
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
C. Chavez, NMEMNRD OCD
K. Robinson, Western Refining Southwest, Inc. - Bloomfield

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