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Certified Mail - Return Receipt Requested

July 26, 2022

Mr. Marc Brunet
Terminal Manager
Western Refining Southwest, Inc.
Bloomfield Terminal
#50 County Road 4490
Bloomfield, New Mexico 87413

**RE: SECOND DISAPPROVAL
BLOOMFIELD TERMINAL (FORMER BLOOMFIELD REFINERY)
RIVER TERRACE ANNUAL REPORT VOLUNTARY BIOVENTING/AIR SPARGING SYSTEM
JANUARY – DECEMBER 2020
WESTERN REFINING SOUTHWEST, INC. - BLOOMFIELD TERMINAL
SAN JUAN COUNTY, BLOOMFIELD, NEW MEXICO
EPA ID# NMD089416416
HWB-WRB-21-001**

Dear Mr. Brunet:

The New Mexico Environment Department (NMED) has received Western Refining Southwest, Inc., dba Marathon Petroleum Company's (Western's) Bloomfield Terminal (Former Bloomfield Refinery) River Terrace Annual Report Voluntary Bioventing/Air Sparging System (January – December 2020) (Revised Report), dated October 29, 2021 and received on March 29, 2022. NMED has reviewed the Revised Report and hereby issues this second Disapproval with the following comments.

Comment 1

Comment 5 from NMED's September 8, 2021 Disapproval letter required Western to "[p]rovide a construction diagram for dewatering well DW-3 with the revised Report or cite a reference to the construction diagram in the response letter." Western provided numerous well construction logs provided in the revised Report, however Western failed to provide a construction log/diagram for dewatering well DW-3. Also missing from Appendix C (Well Construction Diagrams) are construction logs/diagrams for bioventing wells BV1, 3, 4, 5, and 6. Provide the construction logs/diagrams for dewatering well DW-3 and bioventing wells BV 1, 3, 4, 5, and 6 with the revised Report or cite references to specific reports including page numbers to the construction diagrams in the second revision.

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
Telephone (505) 476-6000 - www.env.nm.gov

Comment 2

Comment 7 from NMED's September 8, 2021 Disapproval letter required Western to "[e]xplain why groundwater field parameters were not collected from dewatering well DW-2 or to include the data, if available, in the revised Report." Western's response to NMED's Comment 7 states that, "[a] small subset of samples [were] collected in May 2020 during the semi-annual gauging event. This was a shortened semi-annual event due to COVID-19 and the sampling that occurred during this event was not scheduled, therefore, no parameters were taken during the May event due to limited sampling time. There was not enough time to rent the necessary equipment for collecting parameters." Although Western provided the explanation and a revision to Section 3.1.1 (Fluid Level Measurements) in the revised Report, there is still information missing from the May 2020 semi-annual gauging event. Fluid levels were not included in Table 1 (Fluid Levels) for the wells that were gauged and a laboratory report is missing for the "small subset of samples" collected during the May 2020 event in the revised Report. Revise Table 1 to include the fluid levels and provide the missing laboratory reports with the response letter.

Comment 3

Comment 9 from NMED's September 8, 2021 Disapproval letter required Western to include information regarding soil gas sampling in the revised Report. Although Western's response included an email from a subcontractor in Appendix A (Field Methods), describing how the soil gas sampling was performed, the email attachment failed to include the sizes of the different types of tubing used for sample collection. Provide all necessary information in Appendix A in the second revision.

Comment 4

Comment 11 from NMED's September 8, 2021 Disapproval letter required Western to "[e]xplain how the purge volumes are sufficient for the bioventing wells if the casing volume exceeds the purge volumes in the revised Report." Although Western's response to NMED's Comment 11 states that, "[p]urge volumes for the BV wells were calculated according to tubing volume instead of well volume during the 2020 event," Table 4 does not indicate which wells had purge volumes calculated by volume of tubing used. Update Table 4 to distinguish the samples and wells where the purge volumes were calculated using tubing volume and provide the equation in the Notes section of the table in the second revision. Also, explain why using tubing volumes to calculate purge volumes instead of the combined tubing and well volumes is sufficient to determine the appropriate purge volumes.

Comment 5

Section 3.3.1 (GAC Sampling), paragraph 7, page 14 states "[e]levated constituent concentrations in the GAC-Inlet are not expected and could be due to mislabeled samples. These may instead be the samples taken from GAC-Lead. Samples taken from the GAC-Inlet taken on 4/22/20 and 6/17/20 contained elevated concentrations of benzene, ethylbenzene, total xylenes, total naphthalene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, TPH-GRO,

and TPH-DRO. Some of the concentrations detected at GAC-Inlet exceed concentrations found in DW-2 and DW-3. Presumably, these are samples from GAC-Lead which were mislabeled. Concentrations in GAC-Inlet again drop below detection limits during the 4th quarter sampling on 12/30/20, after the lead GAC was changed out.” Provide a flag or an annotation in Table 5 (GAC Filter Monitoring Data Summary) to indicate the GAC-Inlet samples are presumed to be an additional sampling of the GAC-Lead collected during the 4/22/20 sampling event in the second revision. Furthermore, Western must make a concerted effort to ensure that all samples collected are labeled correctly in all future monitoring events.

Comment 6

Several comments from NMED’s September 8, 2021 Disapproval letter required Western to revise Table 3 (Groundwater Monitoring Data Summary) to clarify information in the table; however, the following additional deficiencies were noted in the revised Report:

- a. Western did not include a definition for any of the flags in the “Notes” section of the table,
- b. Some text in the “Notes” section of Table 3 is overlain by the newly added text and is therefore illegible, and;
- c. The added text font color in the “Notes” section of Table 3 is red in the “Clean” final draft of the Revised Report.

Review Table 3 and make the required corrections in the second revision.

Comment 7

In Table 3, Western did not include the laboratory data for duplicate sample, DUP-01, collected on August 5, 2020 or state from which well DUP-01 was collected. Provide this information in the second revision.

Comment 8

In Table 5, Western did not collect duplicate samples during each sampling event at the GAC Unit. Per the Order, “[a]t a minimum, one duplicate sample per sampling event shall always be obtained.” In the future, collect at least one duplicate sample during each sampling event or as otherwise described in the Order. No revision required.

Comment 9

The email attachment at the end of Appendix A, number 8, states, “[u]sing the Geotech High Vacuum Sampler purge 3 well volumes and detached the sampler.” This statement contradicts the data provided in Table 4 (Soil Gas Monitoring Data Summary), as Table 4 indicates purge volumes to be equivalent to one well volume or less. Section VIII.A.8 (Subsurface Vapor-phase Monitoring and Sampling) of the July 27, 2007 Order (Order) states, “[t]he well shall be purged

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of a minimum of five well volumes prior to collection of samples or field measurements.”
Resolve the discrepancy in the second revision. In the future, Western must discuss deviations from the sampling plan in the report or acquire prior written approval from NMED for utilizing different methods to obtain vapor-phase field measurements if the methods differ from methods described in the Order.

Comment 10

Several inconsistencies have been noted in this second disapproval regarding field measurements and the mislabeling of samples and/or sampling points. Western must provide all field notes and forms for all of the field activities described in the Report with the second revision.

Western must address all comments in this second Disapproval and submit a revised Report no later than **September 29, 2022**. The revised Report must be accompanied by a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. In addition, Western must submit an electronic copy of the redline-strikeout version that identifies all changes and edits to the revised Report on a CD/DVD and a hard copy of the clean version of the revised Report.

If you have any questions regarding this letter, please contact Cristina Eads at (505) 490-5808.

Sincerely,

Rick Shean

Digitally signed by Rick
Shean
Date: 2022.07.26
09:52:18 -06'00'

Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
C. Eads, NMED HWB
L. Barr, EMNRD OCD
K. Luka, Marathon Petroleum Company

File: Reading File and WRB 2022