



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

December 21, 2022

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

**RE: DISAPPROVAL
RIVER TERRACE ANNUAL REPORT VOLUNTARY BIOVENTING/AIR SPARGING SYSTEM
JANUARY – DECEMBER 2021, APRIL 15, 2022
BLOOMFIELD TERMINAL (FORMER BLOOMFIELD REFINERY)
WESTERN REFINING SOUTHWEST, INC. - BLOOMFIELD TERMINAL
SAN JUAN COUNTY, BLOOMFIELD, NEW MEXICO
EPA ID# NMD089416416
HWB-WRB-22-003**

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 2021* (Report), dated April 15, 2022. NMED has reviewed the Report and hereby issues this Disapproval with the following comments.

Comment 1

The signature block is missing from the title page as required by Section X.C.1 (Title) of the July 27, 2007 Final Order (Order). The signature block must be provided in the revised Report.

Comment 2

In Section 3 (Performance Monitoring Activities), page 5, paragraph 1, there appears to be a typographical error in reporting the number of temporary piezometers. Western states "[t]he River Terrace system currently consists of the following:

- Five biovent wells (BV-1, BV-3, BV-4, BV-5, and BV-6);
- 10 temporary piezometers (TP-3 and TP-6 thru TP-13);"

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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

Bullet item 2 reports that the River Terrace system consists of 10 temporary piezometers (TP-3 and TP-6 through TP-13). However, based on the piezometers (TP-3 and TP-6 through TP-13) referenced in Bullet Item 2, only 9 Temporary piezometers are listed. Revise the Report to correct this statement by providing the correct number of piezometers or by including the missing piezometer in the text.

Comment 3

Section 3.1.1 (Fluid Level Measurements), page 5, paragraph 1 states, "TP-5 could not be located during either gauging event and is assumed to have been destroyed during grading activities. A thorough search will be performed for TP-5 in 2022." Table 1 also describes TP-5 as "Well Destroyed." Explain the reason grading activities took place at this location and why the operator was not informed that there were wells present at the site. After Western has located and determined that TP-5 was destroyed during grading activities, Western must abandon and replace TP-5 in accordance with Section IX.D. (Well Abandonment) of the Order which requires approval from NMED and the New Mexico Office of the State Engineer to abandon wells. Western must plug and abandon TP-5 in accordance with 19.27.4 New Mexico Administrative Code *Rules and Regulations Governing Well Driller Licensing Construction, Repair, and Plugging of Wells*. Western must submit the abandonment report for TP-5 to NMED within thirty days upon completion. No revision required.

Comment 4

Several statements and data points presented throughout this Report contradict the availability of access to wells DW-2 and DW-3. The following contradictions are listed below.

- a. Section 3.1.1 (Fluid Level Measurements), page 5, paragraph 1, Western states, "[d]uring both events, fluid level measurements were collected from MW-48, MW-49, DW-1, DW-2, DW-3, collection gallery, TP-3, TP-6, TP-7, TP-8, TP-9, TP-10, TP-11, TP-12, and TP-13";
- b. Section 3.1.2 (Groundwater Sampling and Field Parameters), page 5, Paragraph 1, Western states, "[d]uring the low-flow groundwater sampling event occurring between August 18 and August 19, 2021, samples were collected from TP-6, TP-7, TP-8, TP-9, DW-1, DW-3, MW-48, MW-49, and the collection gallery";
- c. Section 4.1 (Groundwater Sampling Results) summarizes sample results for DW-3;
- d. Table 1 (Fluid Level Measurements) presents both DW-2 and DW-3 as inaccessible in April 2021;
- e. Table 1 (Fluid Level Measurements) presents fluid level data collected in August 2021 for DW-2, however fluid level data was not collected in August 2021 for DW-3;

- f. Table 2 (Groundwater Field Measurements) presents data collected for DW-2;
- g. On Table 2, page 5, row 14, Western did not include field measurements for DW-3 because the well could not be located;
- h. Table 3 (Groundwater Monitoring Data Summary) does not include analytical data for DW-2 in August 2021, but analytical data is included for DW-3 in August 2021;
- i. Appendix B (Groundwater Field Data Forms) does not include the Groundwater Field Data form for DW-2 in August 2021, but the Groundwater Field Data form is included for DW-3;
- j. Figure 5 depicts the location for DW-2 and indicates “Not Sampled – Could Not Access” on the figure.

Revise the Report to clarify the state of accessibility of DW-2 and DW-3 and provide all field notes related to the Report.

Comment 5

In Section 3.1.2 (Groundwater Sampling and Field Parameters), page 6, Western presents the EPA Methods used for analyzing the groundwater samples in a table. This table is also presented in the Executive Summary on page ES-1. In both tables, EPA Methods 6010 and 7470 are listed as the analytical methods used to analyze “Total Recoverable Metals” in the groundwater samples; however, EPA Methods 200.7 and 245.1 are the analytical methods listed in the laboratory reports. Although EPA methods SW-846 6010 and 7470 are very similar to EPA Methods 200.7 and 245.1, the analytical methods listed in the lab report must match the analytical methods listed in the Report narrative. Explain why EPA Methods 200.7 and 245.1 were used to analyze the groundwater samples instead of EPA Methods 6010 and 7470. Furthermore, Western must discuss all deviations from the Monitoring Plan in the Report and must also receive approval from NMED prior to changing any analytical method. Make the appropriate changes in the revised Report.

Comment 6

In Section 3.2.1 (Pressure Readings), page 6, paragraph 1, Western states, “[t]he pressure reading in sparge line B decreased from 44 inches of water in 2020- to 1.1 inches of water in 2021.” Data from 2020 and any previously recorded data was not included in Table 4 (Soil Vapor Monitoring Data Summary). Revise the Report to provide historical soil vapor monitoring data for the last 3 events in Table 4 to support statements related to the comparison of the provided data.

Comment 7

Section 5.2 (Discussion and Recommendations), page 11, paragraph 3 contains a typographical error when referring to the air sparge blower in the statement. It is stated as the “air spare blower.” Revise the Report to correct this error.

Comment 8

Table 4 (Soil Vapor Monitoring Data Summary) is missing the purge volume data from the current sampling event. Table 4 is also the only table provided that does not include historical data in this Report. Previous reports have included historical soil vapor monitoring data. Revise the Report to include the missing purge volume information and the historical data for # events. See also Comment 6.

Comment 9

Table 4 indicates pressure readings were not measured at wells TP-6, TP-7, and TP-8. The Report narrative does not provide an explanation for why these measurements were not collected. Revise the Report to discuss why pressure readings were not measured at wells TP-6, TP-7, and TP-8.

Comment 10

Table 4 indicates that data could not be collected from the Main Blower because “Could Not Access.” However, Western does not explain in the Report narrative why the blower could not be accessed. Revise the Report to discuss the access problems with the Main Blower.

Comment 11

The last page of Appendix B (Groundwater Field Data Forms) includes a form titled “Sample Port/Well and Vacuum Response Data.” However, the form appears to be incomplete as it is missing the sampler’s name(s) and the date the samples were collected. It is important to include this information on the form and provide it in the field notes. Include this information with the submittal of future Reports. Additionally, the times recorded on this form do not match the times written on the chain of custody for the soil vapor samples. Explain why there are two different times reported for each sample collected and what the recorded times represent.

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Western must address all comments in this Disapproval and submit a revised Report no later than **March 1, 2023**. 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 a redline-strikeout version that identifies all changes and edits to the revised Report and a 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: 2022.12.21
10:03:39 -07'00'

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 File