

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Wednesday, April 27, 2011 7:57 AM
To: Tsinnajinnie, Leona, NMENV
Cc: Cobrain, Dave, NMENV; VanHorn, Kristen, NMENV; VonGonten, Glenn, EMNRD
Subject: RE: NOD Draft for Western Refinery - Gallup, Groundwater Monitoring Report 2009

Leona:

OCD looked over the appendices and has the following comments and/or observations for NMED consideration of the above subject letter to the operator:

Appendix E: Summary Underground Waste Water Lines Tested

1) Operator places responsibility for line testing notification to OCD on the NMED, but the operator is supposed to provide notification to OCD at least 72 hrs in advance of line testing under the discharge permit.

2) Operator shall remove NMED from this section as the sanitary waste water is under OCD jurisdiction because the waste water is mixed with treated effluent and evaporated in evaporation ponds as part of OCD refinery waste water treatment system.

Appendix H: Summary of All Leaks, Spills , Releases

1) OCD expects to see no more API overflows in future annual reports based on the upgrades that are being made to the waste water treatment system under the RCRA Compliance Order.

Appendix I: New Well Drilling Logs, Survey, Lab Data

1) Based on NMED recent evaluation of survey datums and NMED observations with concerns about the hydrogeologic illustration of ground water flow direction and hydraulic gradients, a resurvey of datums to 0.01 ft. MSL (i.e., ground and top of well casing) appears to be needed to double check past datums and to establish corrected datums for all future hydrogeologic information, flow diagrams, etc. based on each aquifer system.

2) OCD notices Hall Environmental Laboratory appears to have low or unacceptable recovery for several for phenols, pyrene, and other SVOCs. Also, there were no RPDs displayed, but would also be considered unacceptable by EPA QA/QC Lab Standards. The operator should contact Hall Environmental to determine whether their lab test analyses capabilities can be improved to acceptable standards or the operator shall find a laboratory with better precision instrumentation and laboratory analytical capabilities for any parameters the lab falls short of meeting acceptable QA/QC analytical data results.

Appendix K: Temporary Landfarm Analytical Results

1) OCD notices Central LF Cell 91 and 110 exhibited 1900 and 650 ppm Chlorides respectively on 12/22/2008, which explain why the operator is currently working with the OCD to meet OCD discharge permit limits or background (whichever is greater) in order to remove filled up landfarm and put removed soils to beneficial use. The operator is currently working to develop background criteria under OCD DP by May of 2011.

Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>

"Why not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward with the Rest of the Nation?" To see how, go to "Pollution Prevention & Waste Minimization" at: <http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>)

From: Tsinnajinnie, Leona, NMENV
Sent: Monday, April 25, 2011 1:17 PM
To: Chavez, Carl J, EMNRD
Cc: Cobrain, Dave, NMENV; VanHorn, Kristen, NMENV
Subject: RE: NOD Draft for Western Refinery - Gallup, Groundwater Monitoring Report 2009

Carl-

I was just following up with you to make sure you received the copies of Appendices D through L for Western Refinery-Gallup Groundwater Monitoring Report 2009. I would like to have your comments by Wednesday, April 27th to get the NOD to the facility so they can incorporate our comments in the next monitoring report.

Thanks,
Leona

From: Tsinnajinnie, Leona, NMENV
Sent: Tuesday, April 19, 2011 3:51 PM
To: Chavez, Carl J, EMNRD
Cc: Cobrain, Dave, NMENV; VanHorn, Kristen, NMENV; Martinez, Cynthia, NMENV
Subject: RE: NOD Draft for Western Refinery - Gallup, Groundwater Monitoring Report 2009

Hi Carl-

We do not have an electronic copy of the appendices for the Groundwater Monitoring Report and only received one full copy of the entire report. We will be sending you photocopies of Appendices D through L so you can complete your review of the report. Please have any comments to me by next Wednesday, April 27th. The photocopies should go out today or tomorrow.

I will be including an additional comment that will direct Gallup to make sure that complete copies of the report are sent to NMED and OCD.

Thanks,
Leona