



From: [Larsen, Thurman](#)
To: [VanHorn, Kristen, NMENV](#); [Chavez, Carl J, FMNRD](#); [Cobrain, Dave, NMENV](#)
Cc: [Riege, Ed](#); [Johnson, Cheryl](#); [Morgan, Loretta](#); [Dorsey, Alvin](#); [Iso, Janice](#)
Subject: DECEMBER 2012 MONTHLY PROGRESS REPORT - AMENDED (Benzene Exceedance for December 27th and 30th , 2012
Date: Tuesday, January 15, 2013 11:20:35 AM
Attachments: [DECEMBER 2012 Bnz Results.pdf](#)
[RE REPORT # 1301026.msg](#)
[FW Failed benzene samples.msg](#)
[FW .msg](#)
[FW Dec. 27 benzene samples.msg](#)

Dear Kristen,

The following is an amended monthly report for December 2012 concerning the benzene failures for December 27th and 30th. An investigation was conducted of the incidents of December 27th and 30th that resulted in a benzene exceedance for those two dates through interviews and personnel statements. A summary of the findings are as follows:

The Hall benzene results for December 27th (Report # 1301026) was reported as 880 ug/l (0.880 ppm). Hall also ran a duplicate analysis of 840 ug/l (0.840 ppm) for confirmation. The Hall benzene results for December 30th (Report # 13-1-26) was reported as 540 ug/l (0.540 ppm). Hall also ran a duplicate analysis of 570 ug/l (0.570 ppm) for confirmation.

During the investigation, I received a statement from Off-site (MPPE Operators) concerning the sampling events from December 27th and 30th. According to the statements, no samples were collected during the morning shift of December 27th due to a MPPE Unit upset from high turbidity. The MPPE Unit was down during this time frame and no samples were collected during the morning shift. No water was being sent to STP-1 until the MPPE Unit was online and operational in the afternoon. Therefore, the 880 ug/l sample that was in the refrigerator was inadvertently sent to Hall Laboratory was an older sample which was sent in error.

The benzene exceedance that occurred on December 30th was due to failure to follow sampling protocol. According to the statement, MPPE Operators did not follow the correct sampling procedures as prescribed. The samples were put in the Operator's truck and were not refrigerated after they were collected. Therefore, This sample of 540 ug/l (0.540 ppm) may have been a temperature related issue and not following the correct sampling procedures. This issue was addressed with the Operator by their Supervisor.

In order to address these issues, the refrigerator was moved to the MPPE Unit building. The MPPE Operators will continue to collect the MPPE samples using the proper protocol. However, environmental personnel who pick up the MPPE samples will first check with the MPPE Operators to get their approval prior to removing samples from refrigerator for shipment offsite to Hall Laboratories for analysis. This should eliminate any confusion between the sample collection and shipping personnel. The attachments included are the backup statements and additional e-mail information for your review.

Sincerely,
Beck Larsen

From: Larsen, Thurman
Sent: Friday, January 11, 2013 2:03 PM

To: 'VanHorn, Kristen, NMENV'; 'Chavez, Carl J, EMNRD'; 'Cobrain, Dave, NMENV'
Cc: Riege, Ed; Johnson, Cheryl; Dorsey, Alvin; Tso, Janice; Morgan, Loretta
Subject: DECEMBER 2012 MONTHLY PROGRESS REPORT

Dear Kristen,

The following is the monthly Progress Report for December 2012. Attached are all laboratory results from Hall laboratories for December 2012 sampling events to date through the MPPE for your review.

The monthly flow data for December 2012 from **AL-2 to EP-1** is summarized as follows:

(gpd)	Weir Height (in)	Flow Rate (gpm)	Flow Volume
Average 33368	2.8	23.2	
Maximum 68733	4.3	47.7	
Minimum 281	0.5	0.2	

The monthly flow data for December 2012 of the **API Influent, API Effluent, MPPE Effluent to STP-1** is summarized as follows:

	API Influent (gpm)	API Effluent (gpm)	MPPE
Effluent (gpm) to STP-1			
Average (gpm) 206.84	185.55	240.20	
Maximum (gpm) 269.56	292.82	222.42	
Minimum (gpm) 162.27	155.84	155.34	

Benzene Strippers: The MPPE Unit was in full operation during the month of December (744 hrs). The benzene strippers have not been used since the November 10, 2012 deadline.

MPPE UNIT:

The initial startup of the MPPE Unit occurred on May 8, 2012 at 1500 hrs. Sampling is conducted on a daily basis in accordance with NMED letter of May 24, 2012 (Comment 17). The Agency prescribes the methodology and sampling requirements necessary to fulfill this obligation.

The MPPE Unit was in full operation during the month of December 2012 for a total of 744 hours.

SAMPLING:

MPPE samples were collected during the month of December 2012. During the month the MPPE Unit ran 100% of the time. The MPPE Unit had two excursions on December 27th and 30th. (Refer to Hall Laboratory Report # 1301026.pdf) The benzene value from December 27th was **0.88** ppm). On December 30th the benzene value was **0.54** ppm. Hall Lab ran duplicate analysis which provided confirmation of results. At this time the cause is unknown, however, and an investigation is being conducted and its results will be forthcoming.

If you should have and questions or concerns, please contact me via my office phone (505) 722-0258 or via

my cell at (505) 862-1749.

Sincerely,
Beck Larsen
Environmental Engineer
Western Refining (Gallup Refinery)

WESTERN REFINING - GALLUP REFINERY

MPPE BENZENE ANALYSIS

Date Sample Taken	Western - Lab Benzene Results (ppm)		Hall Sample ID	Time	Hall Environmental Lab Data Benzene Results (ppm)			Results in Compliance < 0.5 ppm Yes; FAILED >0.5	Comments
	AM	PM			Sample rec'd Temp <6° C Acceptable range	Results (ppb)	> 0.5 ppm		
Saturday, December 01, 2012	0.10	0.05	1212025	0800	2.2	51.0	0.05	Yes	Flow Through MPPE
Sunday, December 02, 2012	0.13	0.06	1212025	0800	2.2	120.0	0.12	Yes	Flow Through MPPE
Monday, December 03, 2012	0.10	0.07	1212353	0800	1.0	99.0	0.10	Yes	Flow Through MPPE
Tuesday, December 04, 2012	0.06	0.08	1212353	0800	1.0	62.0	0.06	Yes	Flow Through MPPE
Wednesday, December 05, 2012	0.06	0.10	1212890	0800	1.0	430.0	0.43	Yes	Flow Through MPPE
Thursday, December 06, 2012	0.07	0.04	1212487	0800	1.1	33.0	0.03	Yes	Flow Through MPPE
Friday, December 07, 2012	0.03	0.08	1212487	0800	1.1	ND	0.00	Yes	Flow Through MPPE
Saturday, December 08, 2012	0.04	0.09	1212487	0800	1.1	ND	0.00	Yes	Flow Through MPPE
Sunday, December 09, 2012	0.08	0.04	1212487	0800	1.1	30.0	0.03	Yes	Flow Through MPPE
Monday, December 10, 2012	0.07	0.09	1212650	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Tuesday, December 11, 2012	0.04	0.05	1212650	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Wednesday, December 12, 2012	0.08	0.00	1212650	0800	1.0	62.0	0.06	Yes	Flow Through MPPE
Thursday, December 13, 2012	OOS	OOS	1212890	0800	1.0	330.0	0.33	Yes	Flow Through MPPE
Friday, December 14, 2012	0.00	0.00	1212890	0800	1.0	62.0	0.06	Yes	Flow Through MPPE
Saturday, December 15, 2012	0.35	0.13	1212890	0800	1.0	280.0	0.28	Yes	Flow Through MPPE
Sunday, December 16, 2012	0.31	0.07	1212890	0800	1.0	460.0	0.46	Yes	Flow Through MPPE
Monday, December 17, 2012	0.02	0.05	1212890	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Tuesday, December 18, 2012	0.00	0.20	1212890	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Wednesday, December 19, 2012	0.00	0.00	1212A84	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Thursday, December 20, 2012	0.00	OOS	1212A84	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Friday, December 21, 2012	0.30	0.00	1212A84	0800	1.0	12.0	0.01	Yes	Flow Through MPPE
Saturday, December 22, 2012	0.00	0.00	1212A84	0800	1.0	41.0	0.04	Yes	Flow Through MPPE
Sunday, December 23, 2012	OOS	OOS	1212A84	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Monday, December 24, 2012	0.11	0.00	1212A84	0800	1.0	340.0	0.34	Yes	Flow Through MPPE
Tuesday, December 25, 2012	0.00	0.00	1212A84	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Wednesday, December 26, 2012	0.00	0.00	1301026	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Thursday, December 27, 2012	Unit Down	0.45	1301026	0800	1.0	880.0	0.88	Failed	MPPE DOWN (No AM Sample Collected) No Flow to STP-1 until PM
Friday, December 28, 2012	0.10	0.00	1301026	0800	1.0	130.0	0.13	Yes	Flow Through MPPE
Saturday, December 29, 2012	0.00	0.00	1301026	0800	1.0	ND	0.00	Yes	Flow Through MPPE
Sunday, December 30, 2012	0.30	0.00	1301026	0800	1.0	540.0	0.54	Failed	Bad Sample; Flow Through MPPE
Monday, December 31, 2012	0.00	0.10	1310026	0800	1.0	ND	0.00	Yes	Flow Through MPPE

From: [Andy Freeman](#)
To: [Larsen, Thurman](#)
Subject: RE: REPORT # 1301026
Date: Tuesday, January 08, 2013 3:09:40 PM

Beck,

1301026-002 Original BZ result 880ug/L. reanalysis 840ug/L

1301026-005 Original result 540ug/L. reanalysis 570ug/L.

Hang in there Beck.

Andy

From: Larsen, Thurman [<mailto:Thurman.Larsen@wnr.com>]
Sent: Tuesday, January 08, 2013 3:03 PM
To: Andy Freeman
Subject: RE: REPORT # 1301026

Thanks,

I am trying to compare our internal results with your results. The I have to get with the wastewater Operators to find out what they were doing at the time. Then I have to write a narrative toe explain why we failed. Sounds like "fun"? Huh?

From: Andy Freeman [<mailto:andy@hallenvironmental.com>]
Sent: Tuesday, January 08, 2013 2:58 PM
To: Larsen, Thurman
Subject: RE: REPORT # 1301026

Will do.

Andy

From: Larsen, Thurman [<mailto:Thurman.Larsen@wnr.com>]
Sent: Tuesday, January 08, 2013 2:56 PM
To: Andy Freeman
Subject: REPORT # 1301026

Andy,

Would you mind sending the duplicate results for 12/27 and 12/30/12 for Report # 1301026? (Initial and duplicate)

Thanks,

From: Larsen, Thurman
Sent: Monday, January 07, 2013 7:55 AM
To: 'Andy Freeman'
Subject: RE: MPPE volatiles data

Thanks Andy. Would you mind sending me the duplicate results for the benzene for the samples from 12/27 and 12/30. I.e., the 1st and 2nd (Confirmation) benzene results.

Thanks,

From: Andy Freeman [<mailto:andy@hallenvironmental.com>]

Sent: Thursday, January 03, 2013 2:30 PM

To: Larsen, Thurman

Subject: MPPE volatiles data

Hey Beck,

I have attached some Benzene numbers for the MPPE samples. These numbers have been confirmed.

Andy

From: [Quinones, Joel](#)
To: [Larsen, Thurman](#)
Subject: FW: Failed benzene samples
Date: Thursday, January 10, 2013 10:17:02 AM

I asked Erik to go back through the logs and PI to see what the WWTP conditions were the days that the results failed. Below are his findings.

From: Loera, Erik
Sent: Wednesday, January 09, 2013 8:39 AM
To: Quinones, Joel
Subject: Failed benzene samples

December 27, 2012

On the 27th of December, the water quality (turbidity) of the DGF Effluent was poor throughout the day. The turbidity got as high as 63.52 NTU and did not get lower than 14.81 NTU. Secondary filters were changed twice and the Porous Media filters were changed once. Each column was soaked once, showing that the columns were plugging due to poor water quality. Chemical dosage rates were high, indicating that the Operator was having a hard time controlling the turbidity of the unit. Ronnie Randolph and Cipriano Garcia rotated between API Operator and WWTP Operator. One of these workers caught the Hall sample on the 27th.

December 30, 2012

On the 30th of December, the water quality of the WWTP was very good. The Turbidity did not rise above 6.46 NTU. The level of Tank 35 dropped by 7 inches, indicating that the plant ran very well during the day shift. The quality of the water was good all day. The only thing I see on the notes that would cause poor benzene samples is that the Float Tank was drained. The only discrepancy is that the Float Tank was drained late in the afternoon (4:00 pm) while the benzene samples are caught in the morning. Perhaps the Hall samples were caught towards the end of the regeneration cycle instead of the beginning, but, if this is the case, the samples should still pass. Lorenzo Chavira caught the Hall samples on this day.

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From: [Tso, Janice](#)
To: [Larsen, Thurman](#)
Subject: FW:
Date: Friday, January 11, 2013 1:37:54 PM

From: Loera, Erik
Sent: Friday, January 11, 2013 10:32 AM
To: Dorsey, Alvin; Tso, Janice
Cc: Quinones, Joel; Riege, Ed
Subject:

Alvin and Janice,

The refrigerator used to store the Hall samples until they are picked up has been moved to the WWTP Control Room. This was done to eliminate any confusion in routine sampling and allow Alvin or Janice to speak to the WWTP Operator directly with any sampling concerns. This would benefit both the WWTP Operator and the Environmental Dept. and allow more communication between the two departments. Hopefully this will eliminate the recent problems we have had with the Hall samples. Alvin usually comes into the WWTP Control Room every other day to check on sample bottle supply anyway. I do not believe there would be a problem with collecting the samples here instead of the Lab Petroblast Building. If there is, please let me know and the fridge will be returned to the Petroblast Building.

Thanks,
Erik Loera

From: [Quinones, Joel](#)
To: [Larsen, Thurman](#)
Subject: FW: Dec. 27 benzene samples
Date: Monday, January 14, 2013 9:07:28 AM

Beck, as you can read from the Operator's statement below, the WWTP benzene samples were not caught on Dec. 27th due to unit upset. I don't know where Alvin got the samples from that were sent to Hall, but they were not from us.

On the 30th, the only thing I have been able to determine is that the Operator failed to follow the benzene sampling procedure fully. Apparently he left the Hall samples in his truck and forgot to refrigerate them immediately after they were caught.

From: Garcia, Cipriano
Sent: Friday, January 11, 2013 11:25 AM
To: Quinones, Joel
Subject: Dec. 27 benzene samples

To Whom It May Concern:

On December 27, 2012, I Cipriano Garcia, did not collect the daily benzene water samples at the WWTP due to high turbidity. The turbidity did not get below 14.81 throughout my shift. It was documented in the daily log journal, as well as, verbally communicated to my relief, Mitch Green that samples were not collected.