GW - 040

FORMER DIESEL DISPENSER SYSTEM

2015 - Present

Western Refining

WNR LISTED NYSE

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December 17, 2015

John E. Kieling, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, NM 87505

US Certified #: 7015 0640 0005 8542 0944

Re: Response to APPROVAL WITH MODIFICATIONS
REVISED ACCELERATED CORRECTIVE MEASURES COMPLETION REPORT
FORMER DIESEL DISPENSER SYSTEM, SEPTEMBER 2015
Western Refining Southwest, Inc. – Bloomfield Terminal
EPA ID# NMD089416416

Dear Mr. Kieling:

Pursuant to the Approval with Modifications letter received from the New Mexico Environment Department – Hazardous Waste Bureau ("NMED-HWB") dated November 9, 2015 regarding the above referenced Report, Western Refining Southwest, Inc. – Bloomfield Terminal ("Western") has prepared the following responses:

NMED Comment 1

In Section 4.1 (Soil Sample Field Screening and Logging Results), page 13, paragraph 3, Western states that "[t]he odor indications correspond to the three locations with the highest PID readings." However, Table 1 (Field Screening and Soil Sample Analytical Summary) reports only two samples, DD-08-28' and DD-11-28', with the highest PID readings and corresponding hydrocarbon odor. Sample DD-09-8' had no reported hydrocarbon odor. Revise Section 4.1 to resolve the discrepancies and provide a replacement page with the response letter.

Western Response to Comment 1: Section 4.1 has been revised to address the discrepancies. Replacement pages are provided as attachments.

NMED Comment 2:

Figure 1 (Site Location Map) and 2 (Dispenser System Layout) are missing a north arrow. Revise Figures 1 and 2 to include a north arrow. Also, revise all figures to include a date. Provide replacement figures with the response letter.

Western Response to Comment 2: Figures 1 through 3 have been revised to ensure inclusion of the north arrow and respective report date. Replacement pages are provided as attachments.

NMED Comment 3:

Western's Response to NMED's Notice of Disapproval, dated July 9, 2015, Comment 7 states that Figure 3 was added to the Report in order to "depict the final excavation limits to-scale, the soil sample locations, and their respective sample IDs." The scale of Figure 3 is such that the sample locations in the area of the Fueling Pad are difficult to discern. Revise Figure 3 to

include a smaller scale inset map or diagram of the Fueling Pad that provides a clearer image of the sample locations and revise the text size and color of the sample location labels to ensure that the labels are clear and legible. In addition, Sample DD-08-28' is depicted on Figure 3 in two different locations. Revise Figure 3 to show the correct location of sample DD-08-28'. Include the replacement Figure 3 with the response letter.

Western Response to Comment 3: Figure 3 has been reformatted to allow for better clarity in appearance. In addition, revisions have been made to Figure 3 to address the discrepancy. A replacement page is provided as an attachment.

NMED Comment 4: The images in Appendix C (Photographs of Decommissioning Activities) do not include captions that adequately explain the images. Revise the image captions in Appendix C to include a description which summarizes the date, location, orientation, and key elements of the image. Images that are intended to depict the extent of localized contamination must point out the zone of contamination. Provide replacement images with this response letter.

Western Response to Comment 4: Photos in Appendix C have been revised to include date, location, orientation, and intended purpose of the photo has it pertains to the corrective actions captured in each photo. Replacement pages for Appendix C are provided.

If you have questions regarding the Report, please feel free to contact me at (505) 632-4171.

Sincerely,

James R. Schmaltz
Health, Safety, Environmental, and Regulatory Director
Western Refining

cc: D. Cobrain – (NMED HWB)
N. Dhawan – (NMED - HWB)
K. Van Horne -)NMED-HWB)
L. Tsinnajinnie – (NMED HWB)
R. Murphy – (NMED-HWB)
C. Chavez – (NMED-HWB)
A. Hains – (WNR – El Paso)

SECTION 4 RESULTS AND CONCLUSIONS

4.1 Soil Sample Field Screening and Logging Results

No visual soil impacts were observed along the fueling supply piping trench. Field PID readings collected at seven locations along the trench ranged from 0.0 ppm to 6.3 ppm, with the highest PID reading collected at the sample location at the north end of the diesel fuel supply line (i.e. Sample ID: DD-07-2.5-3.0').

Visual impacts of the soil within the former fueling pad area were localized within areas directly below the dispenser pumps. A total of 19 field samples were collected for field screening purposes within the vicinity of the former fueling pad area. The PID readings from samples collected in this area ranged between 0.8 ppm and 1,200 ppm, with an average PID reading being 92 ppm.

The soils within the trench area and below the concrete pad were characterized as silty sand, very fine, brown in color, and damp. Three of the 26 sample locations were identified as exhibiting slight odors. The three locations were localized in soils below the dispenser pumps, with the highest odors identified below the south dispenser pump. The odor indications corresponded to three of the four locations with the highest PID readings. Table 1 provides a summary of the field observations made and respective PID readings for each sample location.

4.2 Soil Sampling Results

A total of 26 soil samples were collected in the field for laboratory analysis. On June 11, 2013, seven soil samples were collected specifically along the fueling piping trench directly beneath a pipe fitting, which represent the most likely location of where a leak would occur. The remaining 19 samples were collected between June 12, 2013 and June 14, 2013 at locations below the former fueling pad area. Table 1 and Table 2 provide a summary of the analytical results for the soil samples collected. Copies of the respective analytical reports are provided in Appendix E. The following is a summary of the soil sampling results for samples collected along the fueling piping trench and below the former fueling pad area.

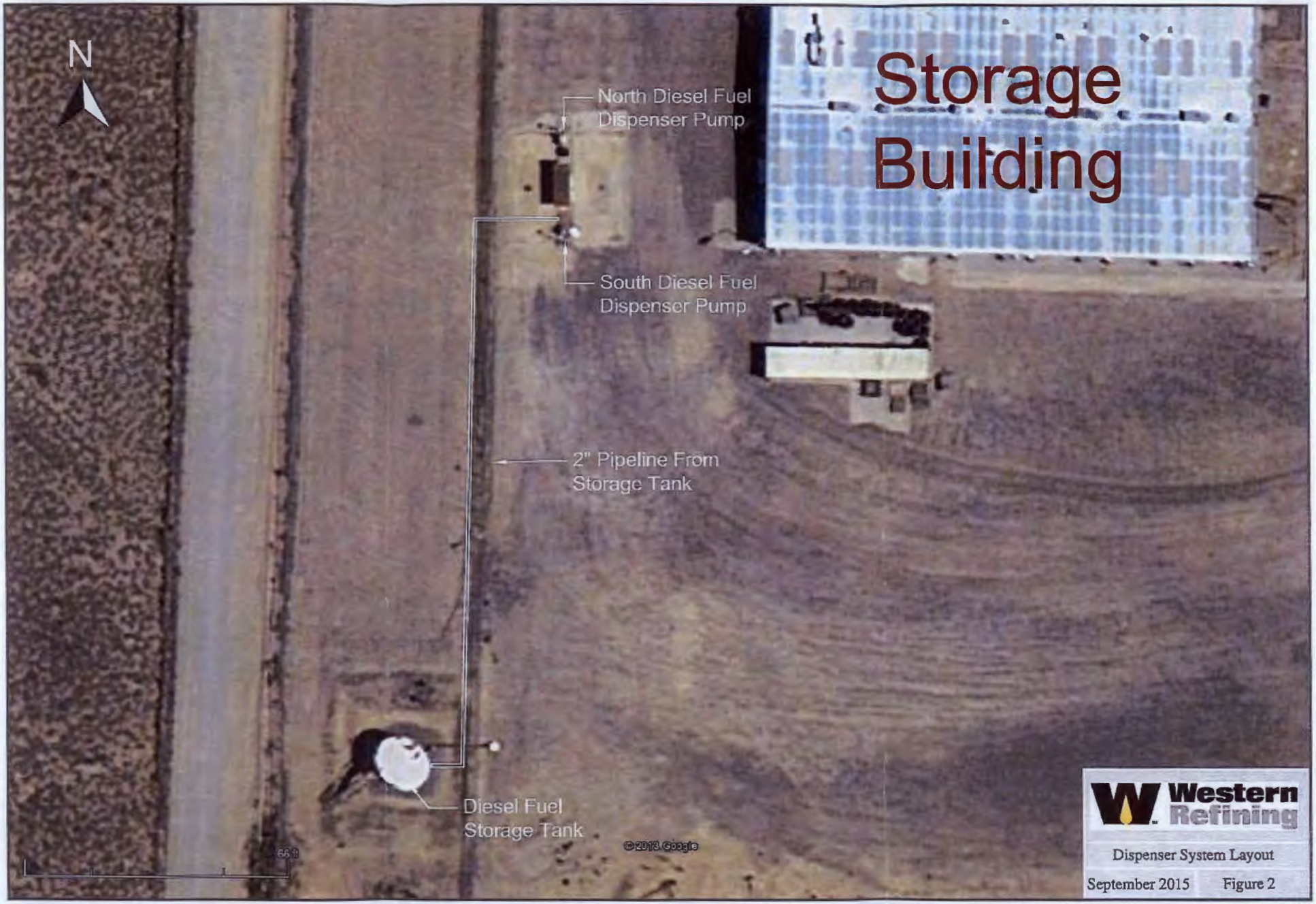
4.2.1 Fueling Trench Soil Sampling

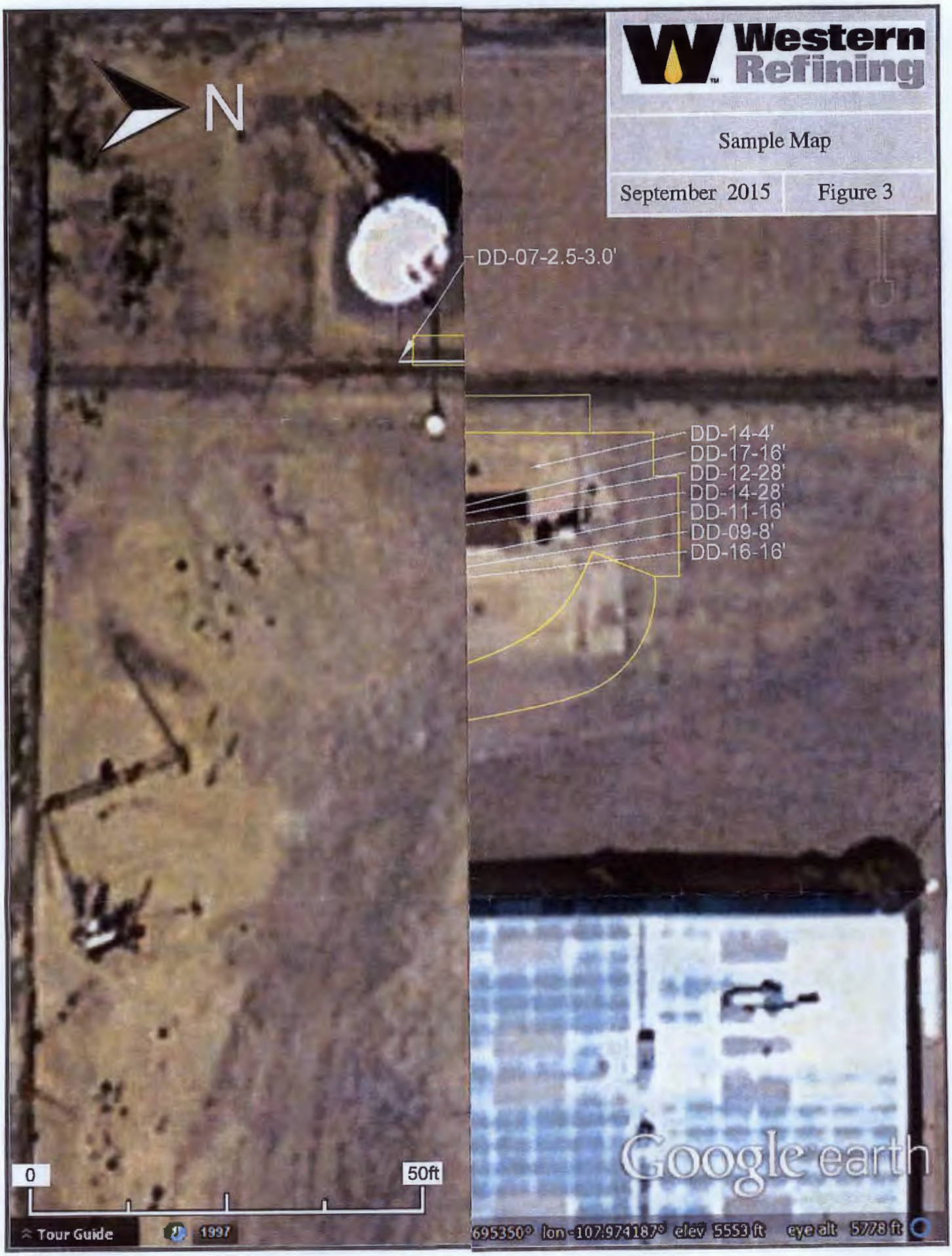
One June 11, 2013, seven soil samples were collected along the fueling piping trench and submitted to the lab for analysis. One sample was collected at each end where the supply line entered a 90 degree fitting (i.e. corresponding sample IDs were DD-01-0-6" and DD-07-2.5-3.0'). Five additional samples were collected at each location along the trench where the piping was joined together by a threaded coupling. All seven samples were submitted to Hall Environmental Laboratories and analyzed for TPH-DRO via EPA Method 8015D. Laboratory results indicated that diesel range organics were detected above the laboratory detection limit at three locations (i.e. Sample IDs are DD-05-3.0-3.5', DD-06-2.5-3.0', and DD-07-2.5-3.0'). The detected concentrations ranged between 14 mg/kg and 37 mg/kg. None of the samples were analyzed for SVOCs because the detected TPH-DRO concentrations were below the 800 mg/kg threshold issued by NMED-HWB.

4.2.2 Fueling Dispenser Area Soil Sampling

Soil samples were collected below the fueling dispenser area between June 12, 2013 and June 14, 2013. Based on visual field observations, it was determined that most of the impacted soil was located within the vanity of the south fueling dispenser pump. A sample was collected below the south dispenser at a depth of approximately 28


N
Sullivan Rd
Western Rd
Diesel Dispenser Excavation
© 2013 Google
Western Refining
Site Location Map
September 2015
Figure 1


N
Storage Building
North Diesel Fuel Dispenser Pump
South Diesel Fuel Dispenser Pump
2" Pipeline From Storage Tank
Diesel Fuel Storage Tank
© 2013 Google
Western Refining
Dispenser System Layout
September 2015
Figure 2



Western Refining

Sample Map

September 2015 | Figure 3

APPENDIX C
Former Diesel Dispensing System Decommissioning
Western Refining – Bloomfield Terminal

These photos capture the fuel supply piping excavation trench which runs north and south. There was no visual indicators of leaks along the supply piping, which connected the diesel supply tank to the dispenser area. The supply line appeared to be intact.

APPENDIX C
Former Diesel Dispensing System Decommissioning
Western Refining – Bloomfield Terminal

The concrete pad at the fueling dispenser pump area was removed in order to begin the excavation of impacted soil. This picture is facing south.

Depicted in this photo are the fueling supply piping stick-ups at dispenser locations. This photo facing north shows the former location of the fueling pumps. The green arrow in the picture shows the former location of the north dispenser and the orange arrow in the photo designates the former location of the south dispenser.

APPENDIX C
Former Diesel Dispensing System Decommissioning
Western Refining – Bloomfield Terminal

These photos facing south show localized impacts within the vicinity of the south dispenser pump. The area of contamination extended vertical and is designated by the arrows in the pictures.

APPENDIX C

Former Diesel Dispensing System Decommissioning
Western Refining – Bloomfield Terminal

These photos facing south of the excavation show the benching that was required to extend the vertical reach of the excavator.