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WORKPLANS 1993

RCRA FACILITY INVESTIGATION TASK 1: DESCRIPTION OF CURRENT CONDITIONS

BLOOMFIELD REFINING COMPANY 50 COUNTRY ROAD 4990 BLOOMFIELD, NEW MEXICO

MARCH 1993

Prepared For:

BLOOMFIELD REFINING COMPANY P.O. BOX 159 BLOOMFIELD, NEW MEXICO 87413

Prepared by:

GROUNDWATER TECHNOLOGY, INC. 2501 YALE BOULEVARD, S.E., SUITE 204 ALBUQUERQUE, NEW MEXICO 87106

Groundwater Technology, Inc.

2501 Yale Blvd. SE. Suite 204, Albuquerque, NM 87106 Tel: (505) 242-3113 Fax: (505) 242-1103

RCRA FACILITY INVESTIGATION
TASK I: DESCRIPTION OF CURRENT CONDITIONS
BLOOMFIELD REFINING COMPANY
50 COUNTY ROAD 4990 (SULLIVAN ROAD)
BLOOMFIELD, NEW MEXICO

MARCH 1993

Submitted to:

United States Environmental Protection Agency Region VI RCRA Technical Enforcement 1445 Ross Avenue Dallas, Texas 75202-2733

Submitted by:

Bloomfield Refining Company 50 County Road 4990 Bloomfield, New Mexico 87413

Groundwater Technology, Inc. Written/Submitted by

Cymantha Diaz Senior Geologist Groundwater Technology, Inc. Reviewed/Approved by

Sara C. Brothers

Operations Manager, New Mexico

BRC/task1.rep

TABLE OF CONTENTS

LIST O	F FIGUR	ES			iii
LIST O	F TABLE	S			iii
LIST O	F APPEN	NDICES			iv
1.0	INTRO	DUCTIO	N		1
	1.1 1.2 1.3 1.4	1.1.1 Hazard Regular Previou 1.4.1 1.4.2 1.4.3 1.4.4	BRC Actions Was tory Back Investion Installat RCRA 3 Off-Site	bund	2 4 4 8 8 8 9
2.0 ENVIRONMENTAL SETTING					
	2.1 2.2 2.3 2.4 2.5	Meteor Hydrold Land U	ology ogy Ise	geologyays and Receptors	12 13 13 14 14
3.0	NATUR	E AND I	EXTENT	OF CONTAMINATION	17
	3.1	3.1.2 3.1.3 3.1.4	Area 1 3.1.1.1 3.1.1.2 3.1.1.3 3.1.1.4 3.1.1.5 Area 2 Area 3 3.1.3.1 3.1.3.2 Area 4 3.1.4.1 3.1.4.2 3.1.4.2 3.1.4.2 3.1.4.3	Landfill and Landfill Pond	18 18 19 21 21 22 23 24 24 25 26 27 28
4.0	GROUN	NDWATE	ER CONE	DITIONS	29

TABLE OF CONTENTS

(Cont.)

5.0	SURF	ACE WATER CONDITIONS	31
6.0	PRE-I	NVESTIGATIVE EVALUATION OF CORRECTIVE MEASURES	32
	6.1	Screening Matrix For Seepage (see also Appendix B)	32
	6.2	Screening Matrix for SPH (Appendix B)	33
	6.3	Screening Matrix for Soil (Appendix B)	33
	6.4	Screening Matrix for Dissolved Groundwater (Appendix B)	34
	6.5	Pilot Tests	35
		6.5.1 Pilot Test to Mitigate Seepage	35
		6.5.2 Pilot Test for SPH Recovery	
		6.5.3 Pilot Test for Soil Remediation	
		6.5.4 Pilot Test for Dissolved Hydrocarbons	36
	6.6	Recommendations for Remedial Actions	37
7.0	SUMI	MARY	38
8.0	REFE	RENCES	30

LIST OF FIGURES

FIGURE 1	SITE LOCATION/TOPOGRAPHIC MAP			
FIGURE 2	PROPERTIES ADJACENT TO BLOOMFIELD REFINING COMPANY			
FIGURE 3	SITE TOPOGRAPHIC MAP			
FIGURE 4	SITE MAP			
FIGURE 5	SITE WELL LOCATIONS			
FIGURE 6	SOIL VAPOR SURVEY RESULTS			
FIGURE 7	SOLID WASTE MANAGEMENT UNITS AND POTENTIAL SOURCE AREAS			
FIGURE 8	SITE CROSS-SECTION A-A'			
FIGURE 9	WELLS WITHIN A ONE-MILE OF FACILITY			
FIGURE 10	WATER TABLE CONTOUR MAP, NOVEMBER 1991			
FIGURE 11	WATER TABLE CONTOUR MAP, OCTOBER 1992			
FIGURE 12	SEPARATE-PHASE HYDROCARBON ISOPLETH MAP, OCTOBER 1991			
FIGURE 13	WATER AND WASTEWATER LINE DIAGRAM			
FIGURE 14	DISSOLVED HYDROCARBON DISTRIBUTION MAP, OCTOBER 1992			
LIST OF TABLES				
TABLE 1	SUMMARY OF HAZARDOUS WASTES GENERATED AT FACILITY			
TABLE 2	MONITORING WELL SPECIFICATIONS			
TABLE 3	SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS, CLOSURE SAMPLING FOR WASTEWATER PONDS, LANDFILL, AND LANDFILL PONDS			
TABLE 4	SUMMARY OF SURFACE WATER SAMPLE ANALYTICAL RESULTS, HAMMOND DITCH AND SAN JUAN RIVER			
TABLE 5	SUMMARY OF ORGANIC GROUNDWATER DATA			
TABLE 6	SUMMARY OF INORGANIC GROUNDWATER AND WATER QUALITY DATA			



LIST OF TABLES (Cont.)

TABLE 7 SUMMARY OF SOIL VAPOR SURVEY RESULTS

TABLE 8 SUMMARY OF WELL INFORMATION FOR WELLS WITHIN ONE

MILE OF SITE

TABLE 9 SUMMARY OF CLIMATOLOGICAL DATA

LIST OF APPENDICES

APPENDIX A SPILL REPORTS

APPENDIX B TECHNOLOGY SCREENING MATRIX



1.0 INTRODUCTION

This "Task I: Description of Current Conditions" report has been prepared pursuant to Part I.C of Attachment II - Corrective Action Plan of the Administrative Order on Consent (Docket No. VI-303-H) dated December 31, 1992 between the United States Environmental Protection Agency (USEPA) Region VI and Bloomfield Refining Company (BRC). The purpose of this report is to summarize the background of the BRC facility, provide information on the nature and extent of contamination and perform a preliminary evaluation of corrective measures technologies. This report provides the basis for the technical approach of the Draft RCRA Facility Investigation Work Plan (RFIWP) submitted concurrently. The RFIWP discusses the additional investigative work tasks proposed to complete the delineation of the nature and extent of contamination resulting from facility operations and to evaluate corrective measure technologies for application at the facility.

This report is organized as follows:

- Section 1.0 provides information on the facility background, previous investigations, and regulatory history;
- Section 2.0 describes the environmental setting of the facility, including geology, hydrology, land use and potential receptors;
- Section 3.0 discusses known and potential sources of releases to the environment and data previously collected in these areas;
- Section 4.0 describes groundwater conditions at the site;
- Section 5.0 describes surface water conditions at the site;
- Section 6.0 provides a pre-investigative evaluation of corrective measures;
- Section 7.0 is a summary of the Task I report; and
- Section 8.0 includes references used in compiling the report.

1.1 Facility Background

The BRC facility is located at 50 County Road 4990 (Sullivan Road), immediately south of Bloomfield, New Mexico in San Juan County (Figure 1). The site is located on a bluff approximately 100 feet above the south side of the San Juan River, a perennial river that flows to the west. On the bluff and between the river and the process area of the facility is the Hammond Ditch, a man-made channel

GROUNDWATER TECHNOLOGY

for irrigation water supply that borders all but the southern portion of the site. Bordering the facility is a combination of federal and private properties (Figure 2). The topography of the site is generally flat with low-lying areas to the east of the process area (Figure 3). The current facility layout is shown in Figure 4.

The BRC facility was originally constructed as a crude topping unit in the late 1950s by local entrepreneur Kimball Campbell. O. L. Garretson bought the facility in the early 1960s, renamed it Plateau, Inc., and sold it in 1964 to Suburban Propane of New Jersey. Suburban upgraded the facility in 1966, increasing the crude unit throughput to 4,100 barrels per day (bbl/day) and adding a 1,850 bbl/day reformer and naphtha hydrotreater. The crude unit was later expanded to 8,400 bbl/day in 1975.

In 1979, the crude unit was expanded again to 16,800 bbl/day capacity. A fluidized catalytic cracker (FCC) with a capacity of 6,000 bbl/day, an unsaturated gas plant, and a treater unit were also added at this time. The capacity of the reformer/hydrotreater was increased to 2,250 bbl/day. The FCC was upgraded in 1982 to conform with state and federal air quality standards.

In November 1980, Plateau applied for a Part A Permit as a generator, storer, treater, and disposer of hazardous waste as a protective filing. Plateau later petitioned for reclassification under a generator-only status (in 1982).

1.1.1 BRC Activities

Bloomfield Refining Company acquired the facility from Suburban Propane (Plateau) on October 31, 1984 and made several improvements in facility management and operations. These improvements are listed below and discussed in greater detail in the "Interim Measures Work Plan" dated February 11, 1993.

1986 Relocated spent caustic tank onto a concrete pad with concrete retaining walls

1987 Upgraded the reformer and increased capacity to 3,600 bbl/day, modified the

laboratory and treater unit, and increased tank storage capacity

Cleaned up north and south bone yards

Decommissioned and dismantled old tanks 6 and 7

Relocated API crude tanks 8 and 9 onto concrete pads with concrete retaining walls



	Established a s	vstematic ins	pection/	maintenance/	repair/	program fo	r tanks
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1988 Added a 2,000 bbl/day catalytic polymerization unit

Removed the facility's two underground storage tanks (USTs) and replaced them

with aboveground storage tanks (ASTs)

Completed cathodic protection system for tank farm and underground piping

Rebuilt process area sewer system and added curbed, concrete paving to the

unpaved process areas

Installed hydrocarbon recovery wells

1989 Increased reformer throughput to 4,000 bbl/day

Activated hydrocarbon recovery system

Installed a concrete pad with curbing between tanks 3 and 4

Constructed first double-lined evaporation pond as part of discharge plan

improvements

1990 Constructed second double-lined evaporation pond as part of discharge plan

improvements

Constructed a drum storage shed and converted to bulk chemical usage to

minimize use of drummed chemicals

1991 Revamped burner fuel rack with concrete paving and curbing

Submitted permit application for underground disposal well

Upgraded hydrocarbon recovery system

1992 Submitted "Air Quality Permit Application to New Mexico Department of the

Environment (NMED)," proposing the installation of a hydrodesulfurization (HDS) unit

and a sulfur recovery unit (SRU) to decrease air emissions

1993 Submitted "Interim Measures Work Plan" to USEPA, proposing additional

hydrocarbon recovery wells, well survey and monitoring

Replaced portions of the underground cooling water piping

Future Implement "Interim Measures Work Plan" upon approval by USEPA

Install and operate underground disposal well upon permit issuance

Close clay-lined evaporation ponds once disposal well is on-line

Double-line NOWP and SOWP by March 29, 1994

Improve pollution prevention measures with additional paving and drainage controls

Decrease emissions by installing the HDS and SRU upon air permit approval

1.2 Hazardous Waste Generation

A summary of substances generated or handled at the facility that have been identified as hazardous wastes, including the reason for listing and the approximate amounts generated, is provided as Table 1. These are wastes that have been generated at the facility in the past, or that continue to be generated as a part of normal operating procedures at the petroleum refinery. BRC currently lists heat exchanger bundle (HEB) cleaning sludge (K050), API separator sludge (K051), leaded tank bottoms (K052), primary oil/water/solids/separation sludges (F037), ignitable wastes (D001), and benzene toxic waste (D018) with generation potential. The D018 waste (refinery wastewater stream) is further identified by a Part A and a Part B application. BRC has also disposed of some spent caustic as a waste, but currently handles the material as a product.

1.3 Regulatory Background

Since 1980, the facility has undertaken a series of interactions with the USEPA, the New Mexico Oil Conservation Division (NMOCD), and the New Mexico Environment Department (NMED) (formerly the New Mexico Environmental Improvement Division (NMEID)) regarding permitting and characterization of the site. The following chronology is a summary of regulatory activities concerning the site:

- August 19, 1980 Plateau (Suburban Propane) notified USEPA that the facility was a treater, storer, and disposer (TSD facility) of hazardous waste as a protective filing.
- November 19, 1980 Plateau was issued a RCRA Part A Permit as a generator, treater, storer, and disposer of hazardous waste.
- April 16, 1982 Plateau amended the Part A permit to reflect their status as a generator of hazardous waste, not a treater, storer, or disposer, and asked that interim status be withdrawn.
- July 1982 NMOCD conducted site inspection.
- May 21, 1982 Plateau applied for delisting of hazardous wastes K049, K050, and K051. BRC did not wish to continue the Plateau initiated petition because of deficiencies in the petitioning process.



- October 21, 1982 through November 30, 1982 Cleaned and lined SOWP and NOWP. Landfilled some material from SOWP and NOWP onsite.
- May 11, 12, 27 and June 8, 1983 USEPA and NMEID sampling events.
- February 1984 Groundwater monitoring wells MW-1 through MW-6 were installed at the facility.
- March 9, 1984 USEPA conducted a Compliance Evaluation Inspection (CEI) of the Plateau facility.
- March 19 through 24, 1984 USEPA conducted a sampling investigation.
- October 31, 1984 BRC purchased the facility.
- March 29, 1985 USEPA issued a RCRA 3013 Administrative Order (as a result of March 9, 1984 CEI) identifying alleged violations and/or technical deficiencies and directing BRC to complete an investigation of geologic and hydrogeologic site conditions.
- April 1, 1985 USEPA issued RCRA 3008(a) Compliance Order (Docket No. RCRA VI-501-H).
- April 26, 1985 BRC submitted RCRA 3013 Workplan proposal.
- June 26, 1985 NMOCD sampling conducted.
- July 5, 1985 USEPA comments on 3013 Workplan.
- August 5, 1985 BRC submitted final 3013 Workplan.
- September 25, 1985 Consent Agreement and Final Order (CAFO) negotiated and signed, incorporated Compliance Order.
- November 26, 1985 USEPA issued a RCRA 3008 Order to pay fine of \$5,700.00 for failure to make timely ownership transfer notices. Required that a closure plan be developed for NOWP, SOWP, Landfill, and Landfill Pond.
- December 2, 1985 USEPA issued approval of 3013 Workplan.
- January 1986 through July 1987 BRC contracted Engineering-Science, Inc. (Austin, Texas) to implement the approved 3013 Workplan. The investigation included an electrical resistivity survey, installation of monitoring wells MW-7 through MW-10, four quarters of groundwater sampling from all wells (MW-6 was dry), performance of slug tests and surface water sampling of the Hammond Ditch and the San Juan River.
- March 4, 1986 NMOCD requested offsite hydrocarbon study.
- June 2, 1986 BRC submitted to NMOCD report on offsite hydrocarbon study("Report on Subsurface Hydrocarbon Data").



- June 30, 1986 BRC submitted to NMOCD Remedial Action Plan, including the installation and operation of hydrocarbon recovery wells.
- August 20, 1986 BRC submitted a "Final Closure Plan for the API Wastewater Ponds, Landfill, and Landfill Pond at the Bloomfield Refinery" (E-S, 1986) to USEPA and NMEID.
- February 6, 1987 BRC submitted "A Final Report on Section 3013 Administrative Order Work Elements" (E-S, 1987) in accordance with RCRA 3013 Administrative Order.
- June 26, 1987 USEPA conducted a CME inspection.
- August 1987 BRC installed offsite groundwater monitoring wells MW-11 and MW-12.
- January 26, 1988 USEPA and NMEID conducted a CEI inspection and recommended corrective action for the facility.
- March 8, 1988 BRC submitted to USEPA, NMEID, and NMOCD "Site Investigation and Remedial Action Conceptual Design".
- May 13, 1988 NMOCD notified BRC to define extent of subsurface hydrocarbons and to initiate recovery of fluids.
- July 31, 1988 BRC conducted a soil vapor survey on BLM property per NMOCD request.
- August 1988 BRC installed additional recovery wells and piezometers for subsurface hydrocarbon recovery and groundwater monitoring well MW-13.
- January 1989 BRC began operation of the hydrocarbon recovery system (RW-1, RW-2 and RW-3).
- April 27, 1989 NMOCD conducted sampling.
- August 1989 BRC submitted "Final Report on Soil Vapor Survey, Well Installation and Hydrocarbon Recovery System" (GCL, 1989) to NMOCD.
- September 12-14, 1989 USEPA conducted CME and CEI inspections, issued report and Notice of Violation for technical deficiencies and alleged violations noted during inspection.
- November 1989 BRC submitted a report to NMOCD about an investigation of the property between the Hammond Ditch and Highway 44 (Avis Salmon property).
- December 1989 BRC excavated the "landfill" area.
- April 9, 1990 NMOCD conducted sampling.
- May 7, 1990 BRC remediated an area of localized contamination on the property between the Hammond Ditch and Highway 44 (Avis Salmon property).



- August 1990 BRC installed additional recovery wells to augment the subsurface hydrocarbon recovery efforts.
- September 1990 BRC submitted a Part A Operating Permit Application for the SOWP and NOWP, and installed high-rate aeration system in these ponds.
- April 29, 1991 BRC submitted a Delisting Petition (ERM, April 1991) to USEPA and NMEID for the "landfill" area.
- September 1991 BRC installed groundwater monitoring wells MW-20 and MW-21 as part of the facility's RCRA groundwater monitoring program.
- September 25, 1991 BRC submitted a Part B Operating Permit Application (ERM, Sept. 1991) for SOWP and NOWP to USEPA and NMEID.
- August 1992 BRC submitted a Discharge Plan Approval (Tierra, 1992) application for an underground disposal well to NMOCD.
- December 18, 1992 BRC submitted an Air Quality Permit Application (BRC, 1992).
- April through December 1992 USEPA issued a draft Administrative Order on Consent to BRC and entered into negotiations with BRC on the Order. The final order was signed by USEPA on 31 December 1992.
- February 11, 1993 BRC submitted the "Interim Measures Work Plan" (GTI, 1993) to USEPA for review as part of the Administrative Order requirements.

The BRC facility currently operates under the following permits:

- RCRA Part A Permit (Interim Status) Hazardous Waste Facility A Part B Operating Permit Application was submitted to USEPA and NMOCD in September 1991. BRC conducts groundwater sampling of groundwater monitoring wells MW-9, MW-20, MW-21, RW-15 and RW-18 as part of the interim status compliance requirements.
- <u>Discharge Plan Approval (GW-1)</u> This approval is for the facility's wastewater treatment system. BRC conducts semi-annual monitoring of wells MW-1 and MW-5 to comply with NMOCD requirements. A new discharge plan approval has been requested (August 1992) for the underground disposal well. Compliance and monitoring requirements will change.
- General Air Quality Permit BRC operates under a General Air Quality Permit under the jurisdiction of the NMED Air Quality Bureau and submits reports for compliance as required. BRC submitted an Air Quality Permit Application and Notice of Intent in December 1992 to modify its existing permit to reduce emissions by adding a hydrodesulfurization unit (HDS), a sulfur recovery unit (SRU), and a cover for the API separator.
- Spill Prevention, Control and Countermeasure (SPCC) Plan The facility has a SPCC plan describing preventative and emergency procedures to control releases of hydrocarbons to the environment. In addition, BRC recently (February 1993)



submitted an Emergency Response Plan to USEPA (Contingency Planning Section) to describe emergency procedures in the unlikely event of a release to the San Juan River.

Stormwater Permit - BRC received a Stormwater General Permit Notice on December 31, 1992 (No. NMR00A013) from USEPA (National Pollutant Discharge Elimination System Program). A Stormwater Pollution Prevention Plan has been prepared. Implementation is proceeding to meet an October 1993 deadline.

1.4 Previous Investigations

A series of investigations has been conducted at BRC to characterize subsurface impacts at the site. Following is a discussion of the studies conducted at the site.

1.4.1 Installation of Wells

Between 1984 and 1991, 14 groundwater monitoring wells, nine recovery wells, and three piezometers were installed as part of the existing NMOCD discharge plan requirements, the RCRA 3013 Administrative Order investigation, or for voluntary recovery of separate-phase hydrocarbons (SPH). Well construction details are summarized in Table 2. Well locations are shown in Figure 5.

1.4.2 RCRA 3008 Order and Consent Agreement Investigation

After issuance of the April 1985 RCRA 3008 Order and Consent Agreement for alleged violations at the facility under previous ownership, BRC submitted a Closure Plan to USEPA and the NMEID to comply with requirements specified in the Order. This included the closure of the API wastewater ponds (SOWP and NOWP), the "landfill", and the landfill runoff pond. In October 1985, soil samples were collected from each of the oily water ponds for closure characterization, and the soil analytical results were consistent with clean closure for the units (E-S, 1986). The landfill runoff pond, created as a result of blockage of an arroyo during construction of the Hammond Ditch, was also sampled in 1985, and again, the results were consistent with clean closure for the unit. A summary of soil sample analytical results for the 1985 closure sampling event is provided in Table 3.



1.4.3 RCRA 3013 Administrative Order Investigation

Subsequent to the issuance by USEPA of the 3013 Order requiring an extensive groundwater study at the site (Docket No. RCRA 3013-00-185), a final report on groundwater conditions (E-S, 1987) was submitted to the USEPA on February 6, 1987. Included in this study were an electrical resistivity survey, installation of groundwater monitoring wells MW-7 through MW-10, monthly fluid-level measurements, quarterly groundwater sampling of wells MW-1 through MW-5 and MW-7 through MW-10 for a one-year period, and a series of slug tests. The results of surface water sampling of Hammond Ditch and the San Juan River (summarized in Table 4) were submitted to USEPA on September 14, 1987, so that samples could be collected during low-flow conditions. Tables 5 and 6 provide summaries of groundwater analytical data for organic and inorganic analyses, respectively.

1.4.4 Off-Site Investigation

In 1988, BRC conducted a soil vapor survey of land owned by the Bureau of Land Management (BLM) adjacent to the facility. A report of findings was submitted in August 1989 (GCL, 1989). During this time, three piezometers, two recovery wells and one monitoring well were installed, MW-10 was converted to a recovery well (RW-3), pneumatic skimmer pumps were installed in the recovery wells, and the system was started up on January 4, 1989.

A total of 25 soil gas survey locations (three on the BRC property and 22 on the BLM property) taken at five-foot depths were analyzed for benzene, toluene, ethylbenzene, total xylenes, tetrachloroethene, and trichloroethylene using a portable gas chromatograph. The highest concentrations of soil vapors detected were in the onsite survey locations, decreasing to the south across Sullivan Road. Vapor concentrations were detected southeast of the site near monitoring well MW-11 (survey location 14). A summary of soil vapor survey results is presented in Table 7. Soil gas survey locations are shown in Figure 6.

1.5 Documentation of Product Spills at Facility

The facility has been an active petroleum refinery since its construction in the late 1950s. The following is a chronology of the known major product spills at the facility since BRC's ownership. These incidents were reported to the appropriate authorities (NMOCD), and copies of the spill reports are included in Appendix A. A map showing the approximate locations of major spills is provided as Figure 7.



Date:

November 7, 1984

Incident:

880 barrels of naphtha spilled, 80 unrecovered.

Location:

Storage tank.

Action:

Contained in tank dike, cleaned up, and returned to system.

Date:

May 19, 1985

Incident:

140 barrels of diesel fuel spilled, 80 unrecovered.

Location:

Inside Tank 19 dike.

Action:

Within one hour of discovery, removed product from tank, water pumped into tank, small pit dug to contain leak and vacuum truck used to pump out pit. Modified piping to pump contents of tank into another tank. Maintained

water level in tank until tank empty and all water recovered from pit.

Date:

April 8-9, 1986

Incident:

200 barrels diesel fuel spilled from leaking diesel rundown piping, 150

barrels unrecovered.

Location:

Lower piperack to the east of crude unit.

Action:

Diesel rundown routed to slop tank, flanges tightened, line inspected. Vacuum truck used to recover pooled diesel fuel, area sanded to prevent

fire hazard.

Date:

February 24, 1987

Incident:

290 barrels regular gasoline spilled during blending, 5 barrels unrecovered.

Location:

Inside Tank dike.

Action:

Water added to float gasoline, cleaned up by vacuum truck. Added warning

sign to check blends and instrumentation.

Date:

August 27, 1989

Incident:

100 barrels gasoline blend/intermediate water spilled, 1 barrel unrecovered.

Location:

Inside Tank 22 dike.

Action:

Vacuum truck used to recover product.

Date:

March 8, 1991

Incident:

180 barrels kerosene (Jet A) spilled during transfer, 60 unrecovered.

Location:

Inside Tank 26 dike (transferred from Tank 5).

Action:

Vacuum truck used to recover product.

In addition, indirect documentation of product releases as a result of discovering leaks in product storage tanks during inspections include:

Tank 17:

February, 1991 - Floor repaired with 120 mils of fiberglass.

Tank 18:

May, 1988 - Five holes patched in epoxy coated floor.

Tank 19:

July, 1985 - Repaired 28 holes in floor.

June, 1990 - Repaired 60 pits/holes in floor. June, 1991 - Replaced old floor with new floor.

Tank 20:

November, 1990 - Repaired 5 holes in floor with fiberglass.

Tank 23:

June, 1992 - Repaired 1 hole in floor.

Tank 24:

May, 1986 - Installed 2 coats of epoxy to floor to repair leaks.

10

GROUNDWATER TECHNOLOGY

Tank 25:	March, 1986 - Installed 2 coats of epoxy to floor to repair leaks.
Tank 26:	February, 1989 - Fiberglass/epoxy coating of floor to repair leaks.
Tank 29:	January, 1990 - Replaced floor because of numerous holes.
Tank 30:	December, 1989 and March, 1992 - Repaired holes in floor.
Tank 31:	March, 1992 - Replaced part of floor on east side because of corrosion holes.

2.1 Geology/Hydrogeology

The BRC facility is located within the San Juan Basin, a subprovince of the Colorado Plateau physiographic province. The site is underlain by Quaternary Jackson Lake terrace deposits, consisting of 10 to 15 feet of coarse-grained fluvioglacial outwash and loess. A permeable cobble layer directly overlies the bedrock at the site, the Tertiary Nacimiento Formation. The Nacimiento Formation is an interbedded, black carbonaceous mudstone/claystone with white, medium to coarse-grained sandstones approximately 570 feet thick in this area. The bluff that crops out along the San Juan River near the site is similarly composed of these lithologies. Underlying the Nacimiento are the Ojo Alamo, Kirtland Shale, and Fruitland Formations (USEPA, 1987). A site cross-section is presented as Figure 8.

Details on ownership and construction of water wells within a one-mile radius of the site are summarized in Table 8, and the location of each is shown in Figure 9. A total of 22 wells were identified in a well search conducted by Tierra Environmental Company, Inc. (Tierra, 1992). The locations of 18 of these wells are shown on Figure 9, since the well records for three wells (#4, 11 and 12) were not reported and the location of well #21 was reported to be located in Township 29 N, Range 11W, Section 25, which is off the map. The locations of two wells (#15 and 22) are only approximate.

As shown in Figure 9, eight wells are within a one-mile radius of the center of the BRC site: #1, 3, 5, 6, 7, 13, 15 and 22. Well #1, located south of the site, is owned by C.W. Wooten. This well is double-cased and is screened between 266 and 306 feet. Well #6 is located west of the site on the opposite side of the Hammond Ditch. This well is owned by D.C. Looney and is reported to be screened between 22 and 32 feet below ground surface. Well #5 is located southwest of the site, is owned by E.H. Brown (Aztec, NM), and is reportedly cased to 20 feet. Wells #3, 7, 13, 15, and 22 are located across (north of) the San Juan River from the site. Due to their location and/or the depths of the screened intervals, none of these wells is at risk for impact from off-site migration of petroleum hydrocarbon constituents, although no testing has been performed.

Groundwater at the site occurs at depths ranging from 6 to 40 feet below ground surface, increasing in depth from west to east across the site. Groundwater flow direction is generally to the north-



northwest, toward the Hammond Ditch and San Juan River. BRC dikes the Hammond Ditch during the non-irrigation season (October 15 through April 15) to maintain a mounding effect of the ditch, thereby inhibiting northward groundwater flow. Groundwater in the perched aquifer migrates through the permeable sands, silts and cobble zone along the relatively impermeable Nacimiento Formation, which is reported to dip toward the north. Groundwater seeps along the bluff occur at the interface between the cobble zone and the Nacimiento. Two water table contour maps using data collected during November 1991 and February 1992 are presented as Figures 10 and 11.

In 1986, slug tests performed to estimate characteristics of the cobble zone indicated average hydraulic conductivity and transmissivity values of 2.08 x 10⁻⁴ feet/second and 171 square feet/day, respectively. The average saturated thickness was estimated at 9.6 feet. Using an estimated average gradient of 0.0025, the calculated flux over a 2,500 square foot area was 8,500 gallons per day or 6 gallons per minute (E-S, 1987).

2.2 Meteorology

A compilation of climatological data for the Bloomfield area is provided in Table 9 (EPA, 1987). The mean temperature extremes for the Bloomfield area occur in January and July. Temperatures are above freezing for the majority of the year (February through November). Mean annual precipitation for the area is 8.37 inches, with the greatest precipitation during the month of August (1.27 inches). Evaporation in the area varies from 68 inches to 45 inches, depending on measurement method. A gross lake surface evaporation rate is estimated at 52 inches (90 percent of a 58-inch floating pan evaporation rate). A net loss of 44 inches results.

2.3 Hydrology

Surface waters in the vicinity of the facility include the San Juan River (to the north) and the Hammond Ditch (Figures 1 and 4). The San Juan River is used for potable water for the town of Bloomfield and surrounding areas, and is controlled by the upstream Navajo Dam (ERM, 1991). The Hammond Ditch, an unlined man-made channel used for irrigation of agriculture and watering of livestock, is not intended for human consumption.

The Hammond Ditch and the surface impoundments that are part of refinery operations distributed across the site contribute to groundwater recharge at the site. Toward the southern portion of the site, as the elevation of the Nacimiento Formation increases, the perched water table dissipates

GROUNDWATER TECHNOLOGY

(MW-6 has been dry since its installation in 1984). The Hammond Ditch (unlined in the vicinity of BRC) is actively flowing during the irrigation season (April 15 through October 15) for agricultural purposes and is diked by BRC during the non-irrigation season. When full, the Hammond Ditch creates a mounding effect, inhibiting groundwater flow. Seepage from the ditch has not been quantified at this time but is known to be substantial based on numerous seeps along the San Juan River bluff. Seepage from the raw water ponds is estimated at 16,500 gallons per day. Seepage from the clay-lined evaporation ponds is estimated at 14,400 gallons per day. No seepage is expected from the HDPE single-lined oily water ponds (SOWP and NOWP) or the HDPE double-lined evaporation ponds.

Stormwater is collected in the curbed, concrete paved process areas that have sewers connected to the wastewater treatment system. Other sewers outside of the paved areas collect stormwater runoff and channel it to the facility's wastewater treatment system. Some areas (not served by sewers) collect process and stormwater in sumps which are emptied by vacuum truck to the wastewater treatment system. Tank berms and dikes are used to control other stormwater runoff.

2.4 Land Use

Public property managed by the Bureau of Land Management borders the facility to the south. Undeveloped public and private lands in addition to several gravel pits border the property to the east and private undeveloped land borders the property to the west. The town of Bloomfield is located immediately north of the refinery, across the San Juan River, and has a population of approximately 5,000. The majority of the undeveloped land in vicinity of the refinery is used extensively for oil and gas production and, in some instances, grazing. U.S. Highway 44 is located approximately one-half mile west of the facility. The adjacent property owners are illustrated in Figure 2.

2.5 Potential Pathways and Receptors

Surface Water

As indicated above, the San Juan River is a source of potable water for the surrounding communities. In addition, the San Juan River is used for recreational purposes (i.e., fishing). The Hammond Ditch provides a barrier to groundwater migration between the facility and the San Juan River. However, seeps from the bluff are a potential source of contamination to the San Juan River and, if impacted, will need to be controlled as part of the facility's interim and final corrective

GROUNDWATER TECHNOLOGY

measures. Overland migration of dissolved petroleum constituents to water bodies is limited by the site-wide stormwater runoff control system.

The Hammond Ditch, because it is used for irrigation of agriculture and livestock, may be a potential pathway for transmission of hazardous constituents to sources of food for human consumption. The United States Department of the Interior - Bureau of Reclamation (USDOI - BOR) has proposed a plan to line the Hammond Ditch with impermeable materials to reduce seepage and thereby reduce the salinity of the water downstream (USDOI-BOR, January 1993). This project will eliminate the potential for impacts to the Hammond Ditch from the BRC facility.

Groundwater

No evidence has been found to date indicating that water wells used for human consumption are completed in the shallow perched water-bearing zone that contains dissolved concentrations of petroleum hydrocarbon constituents at the refinery. The shallow wells depicted in Figure 9 and summarized in Table 8 are used for non-human consumption (irrigation, etc.) purposes.

The deeper aquifer, the Ojo Alamo, is used for potable water, therefore the potential exists for migration of petroleum hydrocarbon constituents to this aquifer. However, the presence of the relatively impermeable Nacimiento Formation (approximately 570 feet thick) between the Ojo Alamo and the shallow, perched zone acting as a confining layer eliminates the possibility of downward migration of dissolved petroleum constituents.

Petroleum hydrocarbons are lighter than water tending to remain in the upper portion of the perched water zone. The lighter-than-water, non-aqueous phase liquids (LNAPLs) provide the primary source for dissolved and adsorbed-phase hydrocarbon contamination at the site. Therefore, these contaminant zones are also expected to be limited to the unsaturated zone and zone of seasonal water table fluctuation for the adsorbed-phase contamination, and the upper, perched water zone for dissolved-phase contamination.

Soils

The process areas of the facility are secure from access by the public with fencing and 24-hour surveillance. High-traffic process areas have been paved. Only facility personnel and contractors will potentially contact contaminated soils during construction or remediation projects at the facility. These projects would be performed in accordance with OSHA requirements and the site-specific Health and Safety Plan.



Contaminated soils presenting potential sources for groundwater contamination will be addressed as part of the corrective measures for the facility, but with consideration to the ongoing industrial activity at the site.

Subsurface Vapors

Volatile petroleum hydrocarbons are present in soils and groundwater at the BRC facility. Vapor hazards have not been identified at the site. Onsite buildings do not have basements where vapors may accumulate. As necessary, subsurface vapors will be addressed as part of the corrective measures for soil contamination at the facility.

<u>Air</u>

The facility operates under a General Air Quality Permit issued by the NMED. Refinery emissions are reported as required in compliance with this permit. BRC has recently submitted a permit modification Notice of Intent to install units to reduce emissions. The soil and groundwater contamination and investigation activities will not contribute significantly to the overall facility emissions. Air monitoring will be performed during the facility investigation in accordance with the site specific Health and Safety Plan. Possible air emissions as part of corrective measures (e.g., emissions from soil vapor extraction activities) will be permitted and monitored as required.



3.0 NATURE AND EXTENT OF CONTAMINATION

The current facility layout identifying all major aboveground structures is depicted in Figure 4. The refinery offices are located on the western end of Sullivan Road along with warehouse space, maintenance and shop areas, a drum storage area, raw water ponds (for temporary storage of water from the San Juan River), and one cooling tower (#1). Process units are located just east of the offices and include: the crude unit, the fluidized catalytic cracking unit, the gas con unit, the treater unit, one cooling tower, reformer/hydrotreater, catalytic polymerization unit, and API separator and oily water treatment ponds.

Aboveground storage tanks (ASTs) occupy a large portion of the facility from north of the process units east along Sullivan Road. Two clay-lined evaporation ponds are located to the east of the tank farms for treated wastewater discharge, and the fire training and "landfill" areas are east of the evaporation ponds near Hammond Ditch. South of Sullivan Road are the terminals where product trucks are loaded and crude trucks are off-loaded. The spray irrigation area and double-lined evaporation ponds are located east of the terminals.

From previous investigations, a separate-phase hydrocarbon (SPH) plume has been partially delineated at the BRC site, extending from the western area of the site (near the offices) to the eastern portion of the AST farm (Figure 12). The sources of this plume are believed to be product releases which occurred from ASTs and associated piping over the many years of the facility's operation as a petroleum refinery. In order to prevent any new releases, BRC has made numerous improvements to the facility's storage and processing units and has established a systematic tank inspection and maintenance program. A cathodic protection system was installed to minimize the potential for future corrosion.

Because of the nature of the SPH plume, and associated adsorbed- and dissolved-phase contamination, the BRC site has been geographically divided into four (4) areas for the purposes of the following discussion regarding the nature and extent of contamination. Potential source(s) within these areas are discussed in this section. It should be noted, however, that BRC intends to consider the entire site as one Solid Waste Management Unit (SWMU) for investigation purposes and as one Corrective Action Management Unit (CAMU) for remediation purposes.



3.1 Geographic Areas

The facility has been divided into four geographic areas which are shown on Figure 7 and are discussed below. In June 1987, an USEPA-led investigation identified 13 areas as Solid Waste Management Units (SWMUs), five of which were further classified as RCRA-regulated SWMUs. These include the two oily water ponds (NOWP and SOWP), the clay-lined evaporation ponds (north and south), the landfill, and the landfill pond. Since that time, it has been determined that the clay-lined evaporation ponds are not RCRA-regulated SWMUs.

3.1.1 Area 1

Area 1 is located on the northeast corner of the site and includes the following units:

- The API Oil/Water Separator and the NOWP and SOWP;
- The Spent Caustic Tank;
- The Former Drum Storage Area(s) (warehouse yard);
- The Major Processing Units; and
- Tank Area for Tanks 3, 4, and 5 and Former Location of Tanks 6 and 7.

As mentioned previously, the NOWP and SOWP are considered RCRA-regulated SWMUs since DO18 (benzene-contaminated) wastes are treated in these units. The API separator is considered a process unit and the spent caustic tank is currently for product storage. The former drum storage area in the warehouse yard was not used for waste storage. The crude unit is the site of a documented spill that occurred in 1986 (see list of spills in Section 1.5). Other spills, although undocumented, undoubtedly occurred during the long history of the refinery and the process areas. The tank areas for tanks 3, 4, and 5 and the former location of tanks 6 and 7 are also considered probable source areas.

Several monitoring wells (MW-4, MW-7, MW-9 and MW-20), recovery wells (RW-1, RW-2, RW-3, RW-18, and RW-19), proposed recovery wells (RW-22 and RW-23) and piezometers (P-1, P-2 and P-3) are located in Area 1. Discernable thicknesses of SPH historically have been observed in many of these wells. Recovery wells RW-2, RW-18 and RW-19 are currently active in the facility's hydrocarbon recovery system. Because SPH has been measured in MW-4, RW-2, RW-19, and RW-18, the entire eastern portion of Area 1 is known to be impacted. The source(s) of this impact are assumed to be product releases (documented and undocumented) from storage and processing areas over the many years of the refinery operations. The sources of the subsurface contamination



in this area are not considered to be limited to the SWMUs discussed in this section. It is likely that a portion of the subsurface contamination migrated from other areas.

3.1.1.1 Wastewater Treatment System: API Separator, SOWP, and NOWP

BRC has an intake in the San Juan River to provide raw water for facility processes. A line diagram illustrating the routing of water through the facility is shown as Figure 13. Water (approximately 369,000 gallons per day) is pumped from the river to the east and west raw water ponds. Water from the raw water ponds is filtered and then either channeled through softeners to the boilers for steam generation or to the two cooling towers. The steam is used in the process units. The process wastewater is discharged to the API separator. Cooling tower blowdown is directly discharged to the API separator.

The wastewater treatment system, which includes the API separator, the south oily water pond (SOWP), and the north oily water pond (NOWP), treats approximately 72 gallons per minute (gpm) of water. The separator, considered a process unit, is a double-chambered steel-reinforced concrete tank that acts as a physical separator of water and oil. Oil is skimmed in the separator and returned to the refinery process, water underflows a weir to the SOWP, and sludges accumulate in the bottom.

The facility drainage system, consisting of a network of tank farm sumps which are emptied by vacuum truck and sewer lines within the process areas, leads directly to the API separator unit. Accumulated API sludge is normally cleaned out annually (never less frequently than every two years) and is shipped offsite to a permitted hazardous waste disposal facility. The API separator discharges water to HDPE-lined SOWP and NOWP, which are equipped with aerators and serve to biologically treat the wastewater. The facility plans to double-line these hazardous waste impoundments in early 1994.

The facility began using aerators in the SOWP and NOWP in 1990 which averaged 91 percent removal of benzene concentrations. Additional aerators were added in May 1991 and again in July 1992. Samples collected between August 1992 and February 1993 on a monthly basis indicate non-detectable benzene concentrations in the effluent from the NOWP in five of the seven sampling events. Benzene was detected during the December 1992 and February 1993 samplings at 0.022 mg/l and 0.040 mg/l, respectively.



After aeration and biological treatment, water is discharged to the evaporation ponds (either the clay-lined north and south evaporation ponds or the HDPE double-lined north and south evaporation ponds). The total daily discharge averages 100,800 gallons. BRC is in the process of permitting an underground disposal well as an alternative to total evaporation of the refinery discharge. When the disposal well is permitted and installed (expected by late 1993), the clay-lined evaporation ponds will be taken out of service and the double-lined evaporation ponds will serve as backup and retention ponds prior to underground injection of treated wastewater.

The oily water ponds were cleaned out in 1982 and lined with 100-mil HDPE liners. The two ponds are scheduled to be double-lined in late 1994. A french drain system, consisting of 4-inch diameter PVC perforated pipe draining to a nearby observation well, was installed beneath the ponds to detect leakage. Leakage was detected in the system soon after its installation, so the ponds were emptied and the liners repaired. Daily monitoring of the ponds is conducted to insure no overbanking of the ponds occurs.

Some of the sludges removed from the SOWP and NOWP in 1982 were disposed onsite into the "landfill", which has been identified by the USEPA as a RCRA-regulated SWMU because of the alleged presence of these sludges (see Area 4).

Soil beneath the ponds were sampled in 1985 (E-S, 1986) as part of a closure plan for the units (Table 3). A total of thirteen soil samples were collected from beneath the two ponds and analyzed for benzene, toluene, ethylbenzene and xylenes (BTEX), phenolics, total chromium and total lead. Only one soil sample contained a detectable concentration of BTEX constituents, which consisted of 7.4 micrograms per kilogram (ug/kg) of total xylenes in sample 51469-17. Phenolics were non-detectable in all samples. Chromium and lead levels were well within the range of background concentrations of these metals in soils.

One soil sample (51469-23) was also analyzed for "Skinner List" parameters (a subset of Appendix VII parameters that are expected to be present at a petroleum refinery.) None of these parameters, which include volatile organic compounds and base/neutral acid extractable compounds, were detected.

Monitoring wells MW-9 and MW-20 and recovery well RW-18 are located downgradient of the wastewater treatment units. During the 1987 EPA inspection, it was noted that the good condition of the liners, the fact that overtopping of the ponds was not occurring, and the presence of the leak

GROUNDWATER
TECHNOLOGY

detection system all serve to minimize the possibility of migration of hazardous substances from the ponds to the soil, surface water, or groundwater. No further investigation is proposed to specifically address the API separator, the NOWP or the SOWP, although non-SPH bearing wells will be included in the groundwater sampling to be performed as part of the facility investigation.

3.1.1.2 Spent Caustic Tank

The contents of the spent caustic tank that had been located near the API separator were sampled during a 1984 USEPA inspection and were found to have a pH of 12.8, thereby rendering the material hazardous based on its characteristic of corrosivity (EPA, 1987). The material also contained levels of reactive sulfides. Since the storage of this waste was not included in the facility's RCRA permit application, this finding was cited in the 3008 Compliance Order issued by USEPA. Ensuing discussions resolved that BRC would not store corrosive or reactive wastes for more than 90 days at the facility.

In 1986, the caustic tank was cleaned out and the material was shipped to a hazardous waste disposal facility. In early 1987, a new spent caustic tank was installed to the west of the SOWP and NOWP. The tank (12 feet in diameter, 20 feet in height) rests on a concrete pad and is surrounded by a concrete containment wall. A transfer pump to remove spent caustic from the tank is located within the containment area. Currently, spent caustic is a product shipped to a pulp paper plant.

During the 1987 USEPA inspection, it was noted that the tank appeared to be in good structural condition with no signs of leakage, and that it was unlikely that releases from the tank would occur. No further investigation is proposed to specifically address the spent caustic tank.

3.1.1.3 Drum Storage Areas

North Bone Yard

Several areas where drums were stored at the facility were noted during the 1984 inspection by the USEPA, including the north bone yard located north of the clay-lined evaporation ponds (Area 4). In July 1987, BRC removed the drums from this area to the area west of the refinery offices. Currently only empty drums are stored in the north bone yard. Monitoring well MW-1 is located in the north bone yard and is sampled on a semi-annual basis as part of the facility's discharge plan compliance requirements. Dissolved hydrocarbon concentrations in MW-1 historically have been low or non-detectable.



Warehouse Yard

During the 1987 inspection, drum storage for solvents and oils used in the refinery processes had been consolidated to the fenced area west of the refinery office (warehouse yard). In 1988, the facility again upgraded its drum storage area by constructing a metal frame storage shed with concrete flooring and curbing and a collection trench. This project was part of the facility's program to convert to bulk storage and minimize drummed chemicals. Drums containing primarily lube oils are currently stored on a rack in the shed. For the most part, chemicals used in the refinery processes are stored in the process areas in portafeed tanks or stainless-steel totes. Recovery well RW-1 and piezometer P-1 are located in the warehouse yard. Well RW-1 is connected to the hydrocarbon recovery system but is not currently active since SPH has not been detected in this well for several consecutive monitoring events and the recovery well underlies the office and warehouse leachfield. Groundwater sampling as part of the facility investigation will include RW-1, provided SPHs are not present in the well.

90-day Hazardous Waste Storage Area

Drums of hazardous wastes are stored in an indoor, 90-day storage room in the east end of an auxiliary warehouse building (Area 3). The room is fully enclosed and has a concrete floor in good structural condition. The only drums stored in this area are those containing wastes awaiting offsite shipment to a hazardous waste disposal area. During the 1987 inspection, it was noted that releases of waste from this drum storage area were unlikely to occur. No further investigation is proposed to specifically address the 90-day waste storage area.

3.1.1.4 Crude Unit and Other Process Units

As discussed in Section 1.5 above, a spill near the crude unit was reported in April 1986. A total of 200 barrels of diesel fuel were spilled, 150 of which were not recovered. The area has since been paved with concrete. This area is not easily accessible for investigation. The facility investigation activities will characterize this portion of the site and provide data for corrective measures evaluation. Other process areas are likely to have had undocumented releases of products over the long history of the facility.



3.1.1.5 Tanks 3, 4, 5, 6, and 7

Tanks 6 and 7 were removed from service in mid-1987 because of corrosion and generally poor structural condition. Tanks 3, 4, and 5 have capacities of 420,000 gallons each and currently contain JP4 Jet Fuel (tanks 3 and 4) and premium unleaded gasoline (tank 5). The two additional recovery wells to be installed in this area as proposed in the "Interim Measures Work Plan" will further define groundwater and soil conditions in this location and will serve to enhance the existing subsurface hydrocarbon recovery system.

3.1.2 Area 2

A second geographic area of the facility consists of the main AST farm. The documented product releases in Area 2 are:

- Inside the Tank 19 Berm;
- Inside the Berms for Tanks 21 and 22; and
- Inside the Tank 26 Berm;

Product releases (documented and undocumented) from the ASTs and associated piping are believed to be the primary source of subsurface impacts at the BRC facility. Spills occurred in several of the tank berms in the past as documented in the spill reports included in Appendix A and discussed in Section 1.5 above. Additional and more substantial product releases have been documented as likely because of tank floor leaks detected during routine inspections.

There are four recovery wells (RW-14 through RW-17) and one monitoring well (MW-21) in Area 2. Discernable thicknesses of SPH historically have been observed in the all of the recovery wells which are currently active in the facility's hydrocarbon recovery system. Monitoring well MW-21 is sampled as part of the RCRA groundwater monitoring compliance (Table 5). Dissolved concentrations during the past year have shown an increasing trend, with the highest benzene concentration of 3.010 mg/l during the October 1992 event. Since SPH is present in the four recovery wells located across the entire bulk storage area, Area 2 is known to be impacted. The source(s) of this impact are product releases from storage tanks and associated piping. Further investigation in this portion of the facility is proposed as part of the facility investigation because of the historical spills documented and the need to delineate both the SPH and dissolved plumes in this area.



3.1.3 Area 3

Area 3 is the portion of the site to the south of Sullivan Road and includes the following units:

- Transportation Terminal Sump;
- Heat Exchanger Bundle (HEB) Cleaning Area and RCRA 90-day Area;
- Crude Loading Area;
- Product Loading Rack; and
- Underground Piping.

The transportation terminal sump and HEB cleaning areas were identified in the 1987 EPA CME as potential SWMUs but were not considered RCRA-regulated units. The crude loading area was the site of a spill, and the product loading rack and underground piping are considered additional potential sources because of the nature of the activities conducted at these sites. Further investigation in the vicinity of the transportation terminal sump and crude loading rack is proposed as part of the facility investigation.

There are two monitoring wells (MW-13 and MW-6) in Area 3. Monitoring well MW-6 has been dry since its installation in 1984. Monitoring well MW-13 was sampled in 1988 for BTEX, 1,2-dichloroethane, rans 1,2-dichloroethane, nitrate as N, phenol, sulfate and total dissolved solids (TDS). Low levels of BTEX, 1,2-dichloroethane and phenols were detected. This well will be included in the groundwater sampling to be performed during the facility investigation.

3.1.3.1 Transportation Terminal Sump

An earthen sump was located to the south of the liquid propane gas (LPG) bullets in the southern portion of the refinery (south of Sullivan Road) and was used as a truck cleaning area at one time. The area was backfilled with soil in 1986 and is no longer used. It was noted during the 1987 inspection that although the terminal area was located outside the floodplain, the potential for leaching and migration of hazardous constituents was possible since no liners or containment features were documented for the area. Further investigation of this area is proposed as part of the facility investigation.



3.1.3.2 Heat Exchanger Bundle (HEB) Cleaning Area

The HEB cleaning area is located to the south of Sullivan Road in a room on the east end of the auxiliary warehouse. The room is fully enclosed with sheet metal walls and a concrete floor. A concrete sump in the floor of the cleaning area collects sludges generated during cleaning of the bundles. The sludges are then transported to a hazardous waste facility offsite. Monitoring well MW-13 is located downgradient (to the west) of this area. It was deemed unlikely during the USEPA-led 1987 inspection that the HEB cleaning area would be a source area for transmittal of hazardous constituents to soil, surface water, or groundwater because of the good structural condition of the unit. The downgradient monitoring well MW-13 will be included in the groundwater sampling to be performed as part of the facility investigation.

3.1.4 Area 4

The fourth geographic area includes the following units:

- Evaporation Ponds (north and south);
- Landfill;
- Landfill Pond;
- Fire Training Area; and
- Spray Irrigation Area.

The clay-lined evaporation ponds were considered by USEPA to be RCRA-regulated units during the 1987 USEPA inspection, but it has since been determined that they are non-regulated units. The landfill and landfill runoff pond were identified in the 1987 EPA CME report as RCRA-regulated SWMUs, although BRC has not agreed to this opinion. The fire training and spray irrigation areas were identified as non RCRA-regulated SWMUs by USEPA.

There are four monitoring wells (MW-1, MW-3, MW-5 and MW-8) in Area 4. None of these wells has ever contained discernable thicknesses of SPH. Wells MW-1 and MW-5 are sampled semi-annually as part of the facility's discharge plan compliance requirements for the following parameters:

- water level,
- pH,
- total dissolved solids (TDS),
- RTEX
- chlorinated purgeable volatile hydrocarbons,



- phenol,
- cyanide,
- iron, manganese, sulfate, nitrate/nitrite as N, ammonia, total Kjeldahl N,
- arsenic, barium, boron, cadmium, chromium, and lead.

Monitoring wells MW-3 and MW-8 were sampled quarterly in 1986 during the 3013 investigation. Samples from MW-3 were analyzed for BTEX, phenols, total organic carbon (TOC), cyanide, TDS, chloride and sulfate and metals. Samples from MW-8 were analyzed for these same parameters and volatile organic compounds and semivolatile organic compounds. Tables 5 and 6 summarize this data. Dissolved concentrations of volatile organic compounds, semivolatile organic compounds and phenols have been low or non-detectable. The units comprising Area 4 are not considered to be major contributors to subsurface contamination at the BRC facility. The groundwater monitoring wells in this area will be included in the groundwater sampling to be performed during the facility investigation.

3.1.4.1 Evaporation Ponds

As shown in the line diagram (Figure 13), treated wastewater from the NOWP is transferred first to the south evaporation pond, then into the north evaporation pond, both of which are located to the east of the AST area. The earthen dikes and bottoms of the ponds are lined with 4 to 6 inches of bentonite. The units are inspected daily to assure no overtopping of the ponds occurs. Water is removed from the ponds through evaporation or is transferred to the spray irrigation area to the southeast of the refinery. The two ponds are scheduled to be decommissioned in 1994 upon permitting and operation of the proposed underground disposal well.

Studies using neutron logging, thermonics, and radioactive tracers to determine seepage patterns indicated that water seeps from the ponds at a rate of approximately 10 to 20 gpm.

It was noted during the 1987 inspection that the ponds lie outside of the floodplain, they were observed to be in good condition, and daily inspections of freeboard are conducted by the facility. The USEPA inspection concluded that it was unlikely that hazardous constituents would be transferred to surface waters by overbanking of the ponds. However, because of the seepage of water from the ponds, the units were identified as potential sources of soil or groundwater contamination.



Monitoring well MW-1 is located north (downgradient) of these ponds and is sampled on a semiannual basis according to the facility's discharge plan approval requirements noted above. Concentrations of hydrocarbon contamination historically have been low to non-detectable. Soil and groundwater quality on the west side (also downgradient) of the ponds will be investigated during the facility investigation.

3.1.4.2 Landfill and Landfill Pond

The "landfill" is the low-lying area to the east of the process area into which sludges and contaminated soils from the SOWP and NOWP were placed in 1982.

Soils in the landfill and landfill pond areas were sampled in 1985 (E-S, 1986) as part of a closure plan for the units (Table 3). Eight samples in the landfill area and seven samples in the landfill pond area were collected and analyzed for BTEX, phenolics, total chromium and total lead. Only one soil sample contained a detectable concentration of BTEX constituents, which consisted on 1.3 ug/kg of benzene in sample 51469-13 taken from the landfill pond. Phenolics were non-detectable in all samples. Chromium and lead levels were well within the range of background concentrations of these metals in soils.

One soil sample (51469-23) from the landfill pond was also analyzed for "Skinner List" parameters (a subset of Appendix VII parameters that are expected to be present at a petroleum refinery.) None of these parameters, which include volatile organic compounds and base/neutral acid extractable compounds, were detected.

During the 1987 inspection, it was noted that runoff from the landfill was unlikely to reach surface waters since it is a low-lying area relative to the rest of the surrounding property. However, based on soil and water sampling conducted by USEPA in 1984, this area was noted as a potential source for soil and groundwater. Since 1987, the landfill has undergone the rigors of a delisting petition filed in 1991 (ERM, 1991). Composite soil samples were collected and analyzed for the following parameters:

- ignitability
- corrosivity
- reactivity (cyanide/sulfide)
- total metals
- metals in Toxicity Characteristics Leachate Procedure (TCLP) leachate (TCLP metals)
- EP Toxicity metals



- total pesticides
- total herbicides
- TCLP organics
- total organic carbon (TOC)
- oil and grease
- cyanide
- Appendix VIII constituents

USEPA has recently requested additional sampling in support of the petition which will be conducted by BRC. This SWMU has been subjected to extensive investigation and is being further characterized as part of the delisting process. In addition, as stated above, monitoring well MW-8 will be included in the groundwater sampling to be performed as part of the facility investigation.

3.1.4.2 Fire Training Area

The fire-training area is located to the east of the north evaporation pond in the northeast corner of the site. It is used to practice extinguishing fires similar to those that might occur at the facility. The area includes a fuel tank on the south end of the training area, and diesel fuel, gasoline, and other fuels are used to set the fires for training. The area is covered with gravel, and tanks and vessels in which the fires are set are distributed across the area. During the 1987 CME inspection, black oily stains were noted on the ground around several of the vessels. The area is outside the floodplain, but because of limited containment features, runoff from this area may be transported to surface waters, including Hammond Ditch. It was further noted during the 1987 CME that it is possible that organic compounds used during training exercises may leach to soil and groundwater. Because of the lack of soil data in this vicinity, further investigation of the fire training area is proposed as part of the facility investigation.

3.1.4.3 Spray Irrigation Area

The spray irrigation area is located to the southeast of the refinery and consists of a 10-acre parcel of land onto which water from the north evaporation pond is sprayed through stationary sprinkler heads (mainly from March through October). The area is diked to prevent runoff. It was noted during the 1987 inspection that contamination of surface waters by flooding or runoff from the spray irrigation field was not likely.

Monitoring well MW-5, which is sampled on a semi-annual basis as part of the facility's discharge plan, is located downgradient from this area (Tables 5 and 6). BTEX concentrations in this well have been non-detectable and phenols detected at very low (<0.15 mg/l) concentrations. This well will be sampled during the groundwater sampling to be performed as part of the facility investigation.



4.0 GROUNDWATER CONDITIONS

A site map illustrating the locations of monitoring and recovery wells is shown as Figure 5. In accordance with the NMED's request for monitoring of groundwater quality, under interim status BRC has conducted groundwater monitoring at the facility since November 1991. The wells chosen as compliance monitoring wells are: MW-9, MW-20, MW-21, RW-15, and RW-18. The wells have been sampled for the following analytes:

- BTEX (USEPA method 8020)
- Chlorinated herbicides (USEPA method 8150)
- Organochlorine pesticides and PCBs (USEPA method 8080)
- Total organic halides (TOX, USEPA method 9020)
- Priority pollutant metals (USEPA method 200.7/200 series)
- Total organic carbon (TOC)
- Phenols
- Fecal coliform
- Radiation: Gross alpha/beta, Radium 226/228
- Fluoride, nitrate as N, chloride, sulfate, sodium

As part of the NMOCD's requirements for the facility's discharge plan, wells MW-1 and MW-5 are sampled on a semi-annual basis for the following constituents:

- Total dissolved solids (TDS)
- BTEX
- Chlorinated purgeable volatile hydrocarbons
- Phenol
- Cyanide
- Iron, manganese, sulfate, nitrate as N, total Kjeldahl N
- Metals: Arsenic, barium, boron, cadmium, chromium, lead

In addition to the above groundwater sampling plans, a sampling plan for the proposed injection well will provide for analysis of the following parameters:

- Aromatic and halogenated volatile hydrocarbons (USEPA methods 8010/8020 or 8240)
- General water chemistry: Calcium, potassium, magnesium, sodium, bicarbonate, carbonate, chloride, sulfate, TDS, pH, and conductivity
- Heavy metals (USEPA method 6010)
- Arsenic and mercury (USEPA methods 7060 and 7470, respectively)

A summary of all available organic and inorganic groundwater data collected in the course of the numerous investigations conducted at the facility is provided in Tables 5 and 6, respectively, and a



map depicting the most recent (October 1992) distribution of dissolved hydrocarbons (BTEX) is shown as Figure 14. The tables show only compounds that were detected.

During the four quarters of monitoring of wells MW-1 through MW-10 (except MW-6 which was dry), samples from MW-4, MW-7, MW-8, MW-9, and MW-10 were also analyzed for full VOCs and BNAs. With the exception of a single occurrence of 1,2-dichloroethane (at 2 ug/l in MW-1 in December), no VOCs other than BTEX were detected. Based on these results, BTEX (by USEPA Method 602) would be an appropriate analysis for future groundwater sampling events.

Four quarters of data (November 1991 through October 1992) show that no significant changes in groundwater quality have occurred over the past year. It should be noted that wells RW-15 and RW-18 typically contain SPH which is decanted prior to analysis of the samples. Dissolved concentrations of BTEX in these wells are consistently elevated, which is expected. The dissolved concentrations in wells MW-9 and MW-20 have remained relatively constant over the four quarters monitored, while increasing during the last two quarters in well MW-21.

Similarly, concentrations of metals dissolved in groundwater have remained unchanged through four quarters of monitoring and are considered to be within the range of background concentrations. No concentrations of herbicides or pesticides have been detected, although they are routinely analyzed for in groundwater samples.

Groundwater contamination associated with the SPH plume is limited by the Hammond Ditch which surrounds the facility on all but the southern side. Beyond the ditch to the north, groundwater occurs as seeps in the bluff above the San Juan River. Dissolved contamination extends to the northern (downgradient) end of the facility in the process area of the site, as monitored by wells MW-9 and MW-20. Additional delineation is proposed in the northwestern portion of the site in the area between the fire house and the transformer station. Dissolved contamination in the western portion of the facility may be monitored using RW-1, which previously contained SPH that has since dissipated over time.

The eastern side of the site (upgradient) is monitored frequently and results indicate that the dissolved plume has been delineated in this area. Additional groundwater delineation is proposed in the southeastern, southern, and northeastern portions of the site.

Vertical distribution of soil and groundwater impacts is effectively limited by the physical characteristics of the underlying Nacimiento Formation. The Nacimiento Formation has an extremely low permeability and has exhibited an upward vector of groundwater movement.

GROUNDWATER TECHNOLOGY

5.0 SURFACE WATER CONDITIONS

As described in Section 1.4.3, surface water investigations were conducted in 1986-1987 and included sampling of the San Juan River and Hammond Ditch. Results of the sampling are summarized in Table 4. Four samples were collected from each of the water bodies during low-flow (worst case) conditions. As shown, concentrations of volatile and semivolatile organic compounds were not detected in any of the samples from the San Juan River. Low levels of benzene (6 ug/l) and toluene (3 ug/l) were detected in one of the four surface water samples from the Hammond Ditch (near Sullivan Road). Six targeted semivolatile compounds were also detected at low concentrations in the same sample. Fluoranthene was the only semivolatile compound detected in one of the other three surface water samples collected from the Hammond Ditch (1 ug/l). Phenols were detected in seven of the eight surface water samples at concentrations ranging from 2 ug/l to 18 ug/l.

Additional sampling of surface water and sediment in the vicinity of the site is proposed for both the Hammond Ditch and the San Juan River to obtain more current data.



6.0 PRE-INVESTIGATIVE EVALUATION OF CORRECTIVE MEASURES

Any corrective measure or remedial action for the BRC site needs to account for the contaminant type, volume, media which is contaminated, risk that the contaminant presents, cost for clean-up, and practicality of construction. The initial response in the proposed corrective measure is to mitigate potential seepage into the Hammond Ditch and/or the San Juan River. Other remedial objectives will be to eliminate/mitigate separate-phase hydrocarbons (SPH), remediate soil from which the SPH are still produced, and finally, reduce the concentration of dissolved hydrocarbons in groundwater beneath the site.

Because four remedial objectives are sought, no single technology is applicable across the site. In order to assess technologies, a screening matrix for each remedial objective has been prepared (Appendix B). This section lists the alternatives considered and provides recommendations for acceptable technologies, also identifying pilot studies which may be necessary to further assess the technologies. Risk assessment may be applicable if there are no offsite receptors. Remedial objectives will consider risk or the potential for exposure to chemicals of concern prior to selection of the final remedy.

6.1 Screening Matrix For Seepage (see also Appendix B)

The following corrective measures address mitigation of groundwater seepage into the Hammond Ditch and/or San Juan River:

- Dewater entire area by pumping water
- Construct a grout curtain
- Implement an air curtain
- Build an interceptor trench
- Reverse gradient with pumping
- Implement a water curtain (clean water)

As shown in Appendix B, three alternatives were retained for further consideration: a grout curtain, an interceptor trench and dewatering near the seeps. Dewatering near seeps has been proposed in



the Interim Measures Work Plan (GTI, 1993), although a grout curtain may be needed if the facility's injection well permitting is significantly delayed.

These measures may be temporary if BRC can decrease the use of evaporation ponds which contribute to the recharge of perched groundwater beneath the site. As described previously, a discharge plan approval application for an underground injection well has been submitted, and construction is planned for late 1993.

6.2 Screening Matrix for SPH (Appendix B)

The following corrective measures address mitigation of SPH (free floating hydrocarbons) from the water table:

- Install skimming pumps
- Construct dual pump system (groundwater and SPH)
- Remove SPH by vapor extraction
- Utilize high vacuum (Hi Vac) fluid removal
- Perform sparging/vapor extraction
- Perform total fluid pumping

As shown in Appendix B, three alternatives were retained for further consideration from the preliminary screening: skimming pumps, vapor extraction and Hi VAC total fluid extraction. Skimming pumps are already in use in seven recovery wells onsite. Vapor extraction will be evaluated as part of the facility investigation (pilot test).

6.3 Screening Matrix for Soil (Appendix B)

The following measures were considered as soil remediation alternatives:

- Risk assessment (determine exposure levels)
- In situ vapor extraction
- In situ bioventing



- Excavation and disposal/treatment of contaminated soil
- In situ soil washing
- Perform chemical fixation
- Stabilization of mobile contaminants
- Vitrification
- Steam-stripping of contaminants

As shown in Appendix B, two alternatives were retained for further consideration from the preliminary screening: risk assessment and *in situ* vapor extraction. Vapor extraction will be evaluated further during the facility investigation (pilot test). A risk assessment may be useful in determining site-specific remedial objectives.

6.4 Screening Matrix for Dissolved Groundwater (Appendix B)

The following measures were screened for groundwater remediation:

- Risk Assessment (eliminate exposures)
- Altered water management practices for facility
- -- i.e., Gradually reduce the amount of perched groundwater, by decreasing the leakage from the evaporation ponds and raw water ponds
- Pump, treat, re-inject of groundwater
- Pump, treat, re-infiltrate of groundwater
- Perform sparging (VOC stripping, oxygen addition)
- In situ biotreatment (nutrient addition)
- Natural biological degradation combined with source elimination (eventually dissolved contaminants will decrease)
 - -- Only 1% of hydrocarbon mass is dissolved in groundwater
 - -- The object is to eliminate residual sources and contain dissolved hydrocarbon on site



As shown in Appendix B, four alternatives were retained for further consideration during the preliminary screening: risk assessment; pump, treat, reinject; sparging/vapor extraction; and source reduction.

A risk assessment may assist in determining site-specific remedial objectives. If BRC can limit production water recharged into the perched aquifer directly beneath the site, groundwater should decrease in volume over time. The aquifer test to be performed during the facility investigation will assist in evaluating the feasibility of the pump, treat and reinject alternative. The air sparge/vapor extraction pilot study will provide information on the applicability of these technologies. Source reduction (removal of SPH) will be required regardless of the other measures selected.

6.5 Pilot Tests

Prior to investigating any of the preferred technologies identified in Appendix B, pilot tests and a more rigorous cost evaluation will be performed as part of the facility investigation and Task IV - Investigation Analysis.

6.5.1 Pilot Test to Mitigate Seepage

A pump test is necessary to define aquifer parameters for proper spacing of wells and rates of groundwater recovery for the dewatering alternative to mitigate seepage. Slug tests performed in 1986 provided values for aquifer characteristics, although it is preferable to have active pumping data upon which to base a remedial system design. Water pumped during the pump test will be directed to the facility's wastewater treatment plant: If a grout curtain is the selected measure, the type of curtain trench or mix will need to be evaluated. Cobbles and soil stability and excavation into the Nacimiento Formation will also have to be considered. An interceptor trench will require major excavation in order to capture water before it seeps from the bluff. The capital and operation and maintenance costs for this technology will be compared with barrier wells.

6.5.2 Pilot Test for SPH Recovery

Removal of SPH will eliminate the major source of dissolved hydrocarbons at the BRC site. Experience from hundreds of product removal projects has shown that soil vapor extraction (SVE) can be the most effective *in situ* method for accomplishing this objective. This method is applicable for volatile and semi-volatile organic constituents, which comprise the SPH at the BRC site. A pilot

GROUNDWATER TECHNOLOGY test utilizing current monitor wells and specially constructed vapor extraction wells will be performed. This data will aid in extraction well spacing, determining removal rates and evaluating the effect of SVE on soils containing volatile and semi-volatile constituents.

Pilot testing for a high vacuum SVE may be considered but will not be tested at this time. This technology is still emerging, but offers great potential for simultaneous remediation of SPH, water and soil. By moving great amounts of air under a high vacuum, liquids (water and SPH) are brought to the surface. At the same time, volatile and semi-volatile compounds are evaporated from the soil column and biological degradation is enhanced because of the addition of oxygen. Off-gas treatment systems would have to be designed to accommodate the capacity of the subsurface yield.

6.5.3 Pilot Test for Soil Remediation

Vapor extraction and bioventing technologies will require a vapor extraction pilot test to ascertain site-specific removal rates and design criteria such as the effective radius of influence. Monitoring of CO₂ levels is necessary to determine the amount of biological activity occurring during venting. Before employing bioventing for remediation of semi-volatiles, samples to evaluate soil parameters such as moisture, phosphates, nitrates and organic carbon should be obtained during the installation of vapor extraction wells.

6.5.4 Pilot Test for Dissolved Hydrocarbons

Air sparging is one of the most promising technologies available for *in situ* remediation of groundwater with organic contaminants. Sparging will physically strip volatile and semi-volatile constituents from the water column while providing an oxygen source for enhancing biological decay of organic material. The depth, spacing, number and effectiveness can be estimated by pilot testing specially built sparge wells.

In situ bioremediation, with injection/infiltration of water containing greater than normal concentrations of oxygen and nutrients, may be considered if reinfiltration of treated water from dewatering or product recovery activities is possible. The dissolved solids content of the groundwater at the facility is relatively high and may limit the application of this technology. A tracer study for identifying preferential pathways may be necessary. In situ bioremediation should not be performed until SPH is removed.



6.6 Recommendations for Remedial Actions

Source elimination or reduction is the recommended course of action for remedial activities at the BRC site. Seepage of groundwater can be reduced by improved wastewater management practices by BRC (i.e. use of future injection well for process water). The Interim Measures Work Plan (GTI, 1993) proposed additional recovery wells to inhibit the migration of hydrocarbons to surface water. An aquifer test will be performed as part of the facility investigation to indicate optimum pumping rates and location of additional recovery wells needed (if any) to control migration of SPH and dissolved contamination.

Since treated groundwater is presently discharged to the evaporation ponds which contribute to groundwater recharge, this mode of disposal of treated groundwater for the long-term corrective measure is not preferred. Instead, the use of the underground injection well for treated water will limit groundwater recharge at the site and make source control more manageable. If permitting of the injection well is significantly delayed, a grout curtain to control seepage to surface water may be considered.

A risk assessment should be performed to determine remedial objectives for soil and groundwater. Remedial technologies being considered for soil and groundwater include vapor extraction and sparging. Sparging cannot be used without vapor extraction because without vapor extraction there is no way to remove contaminants from the subsurface. Elimination of SPH will significantly reduce dissolved hydrocarbons in groundwater. Vapor extraction is a strong candidate for SPH removal. This technology may also be utilized for soil remediation. A pilot study will be performed as part of the facility investigation to determine design parameters for a soil vapor extraction (and possibly, air sparging) system.



7.0 SUMMARY

Surface water, groundwater, and soil have all exhibited varying degrees of impact by petroleum hydrocarbons. The RFI work plan (Task II) is designed to address those areas in which additional investigation is necessary in order to design and implement an effective corrective measure strategy.

The investigation includes characterizing specific SWMUs identified by USEPA during the 1987 inspection as well as completing the delineation of the SPH and dissolved plumes at the site. The approximate horizontal dimensions of the separate-phase hydrocarbon plume are depicted in Figure 12. However, additional information is needed along the southern and northeastern edges to further delineate the extent of subsurface contamination. Pilot studies to evaluate various corrective measure alternatives will also be part of the facility investigation.

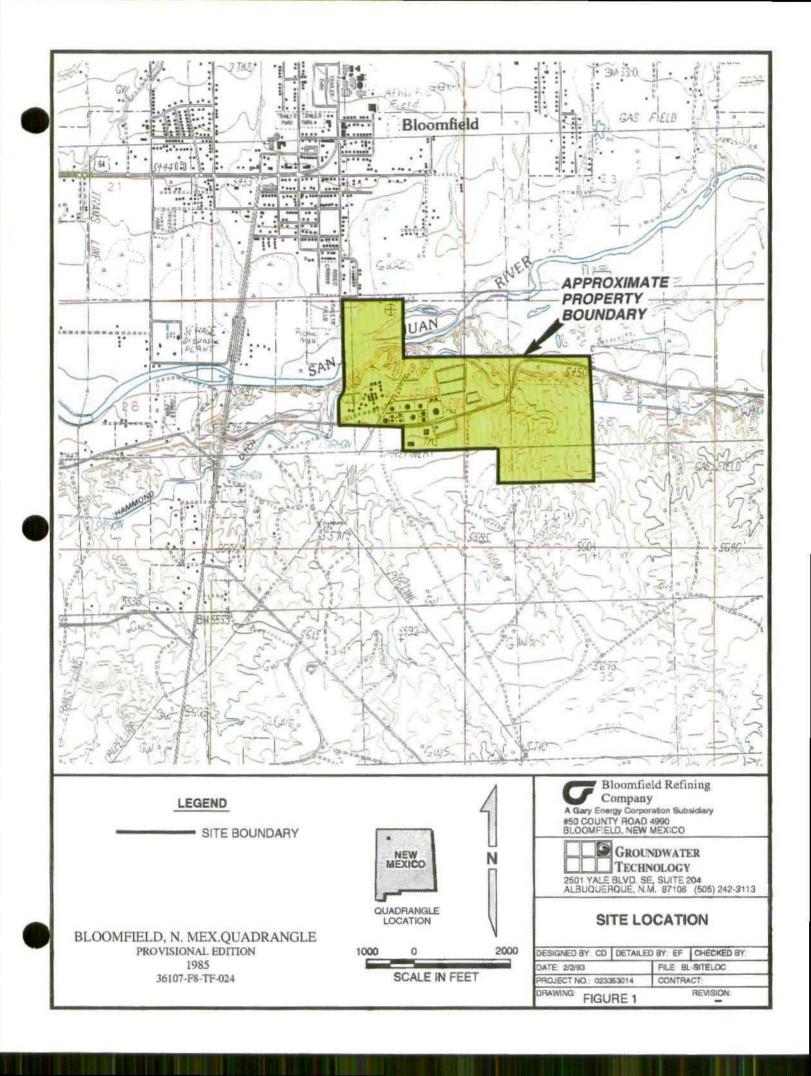
In general, further investigation of all phases of hydrocarbon impact (surface water, groundwater, and soil) will be necessary to the south of the facility, along Sullivan Road, and to the northeast of the AST farm. The additional data from the facility investigation will be used to design and implement a comprehensive, effective remediation program for the BRC site.

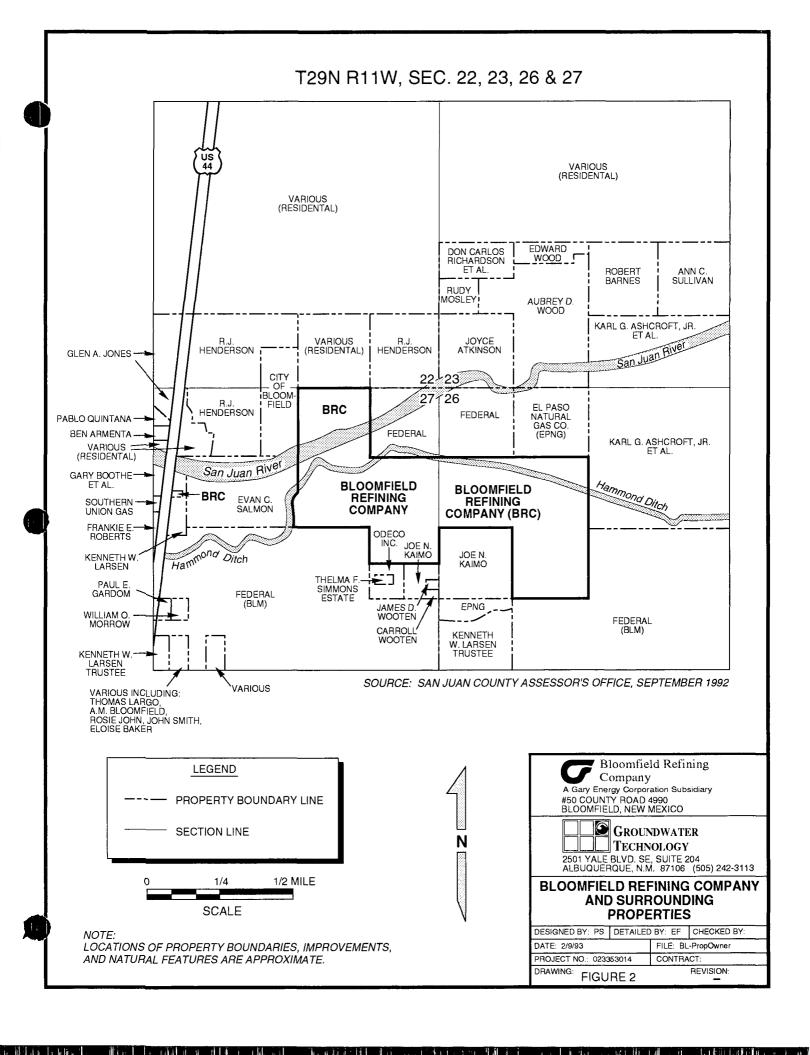


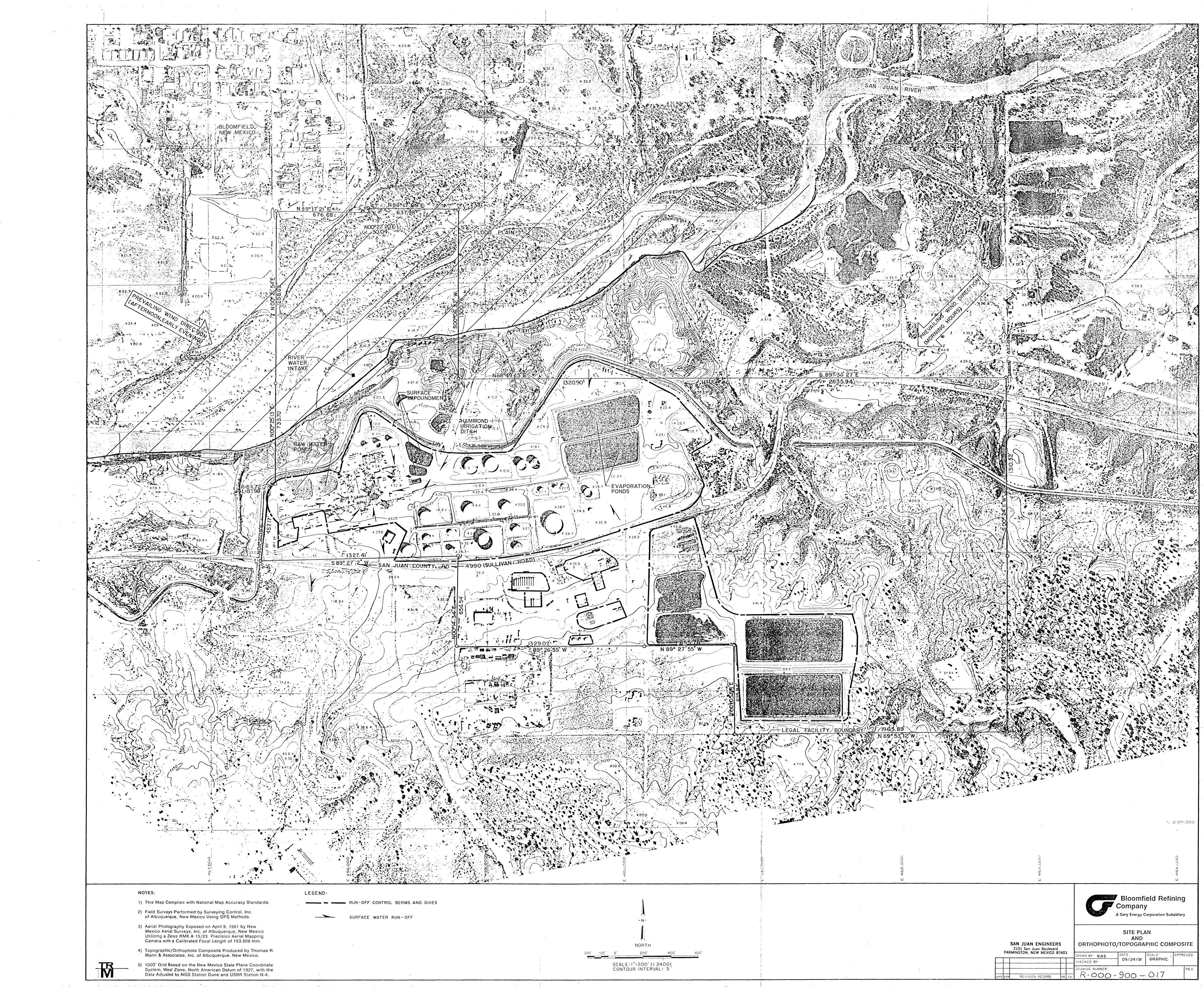
8.0 REFERENCES

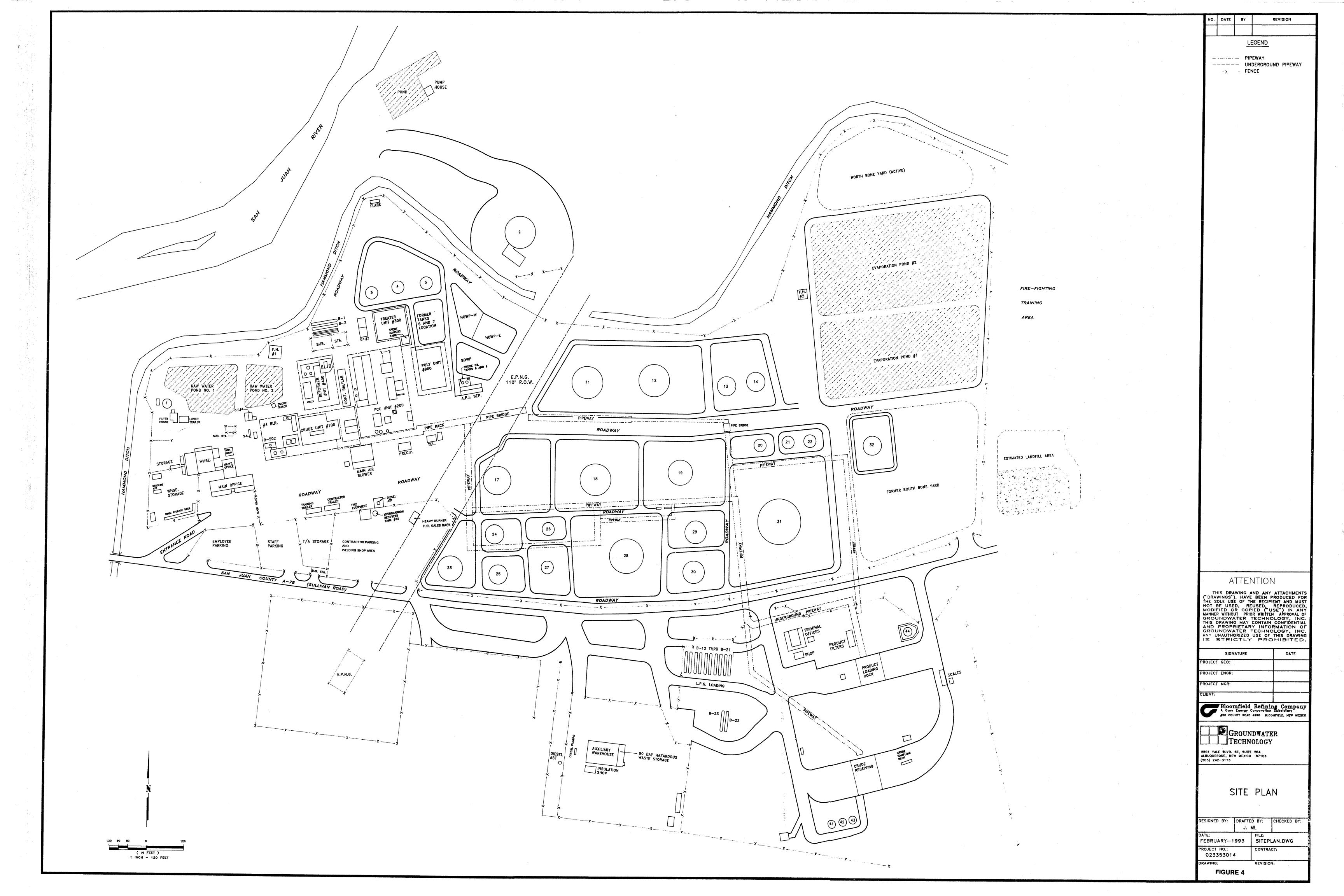
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- ERM-Rocky Mountain, Inc., "Hazardous Waste Delisting Petition Petroleum Contaminated Soil", April 18, 1991.
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- Engineering-Science, Inc., "A Final Report on Section 3013 Administrative Order Work Elements", February 8, 1987.
- Correspondence from Mr. Richard Traylor of Bloomfield Refining Company to Mr. William H. Taylor, Jr. of the USEPA-Region VI dated September 14, 1987.
- Engineering-Science, Inc., "A Final Closure Plan for the API Wastewater Ponds, Landfill, and Landfill Pond at the Bloomfield Refinery", July 1986.
- Geoscience Consultants, Ltd., "Final Report on Soil Vapor Survey, Well Installation and Hydrocarbon Recovery System Bloomfield Refining Company", August 3, 1989.
- United States Environmental Protection Agency EPA Contract No. 68-01-7251, Work Assignment No. 92-6L-20.0, Project No. W68446, "Preliminary Review Report/Visual Site Inspection", August 25, 1987.
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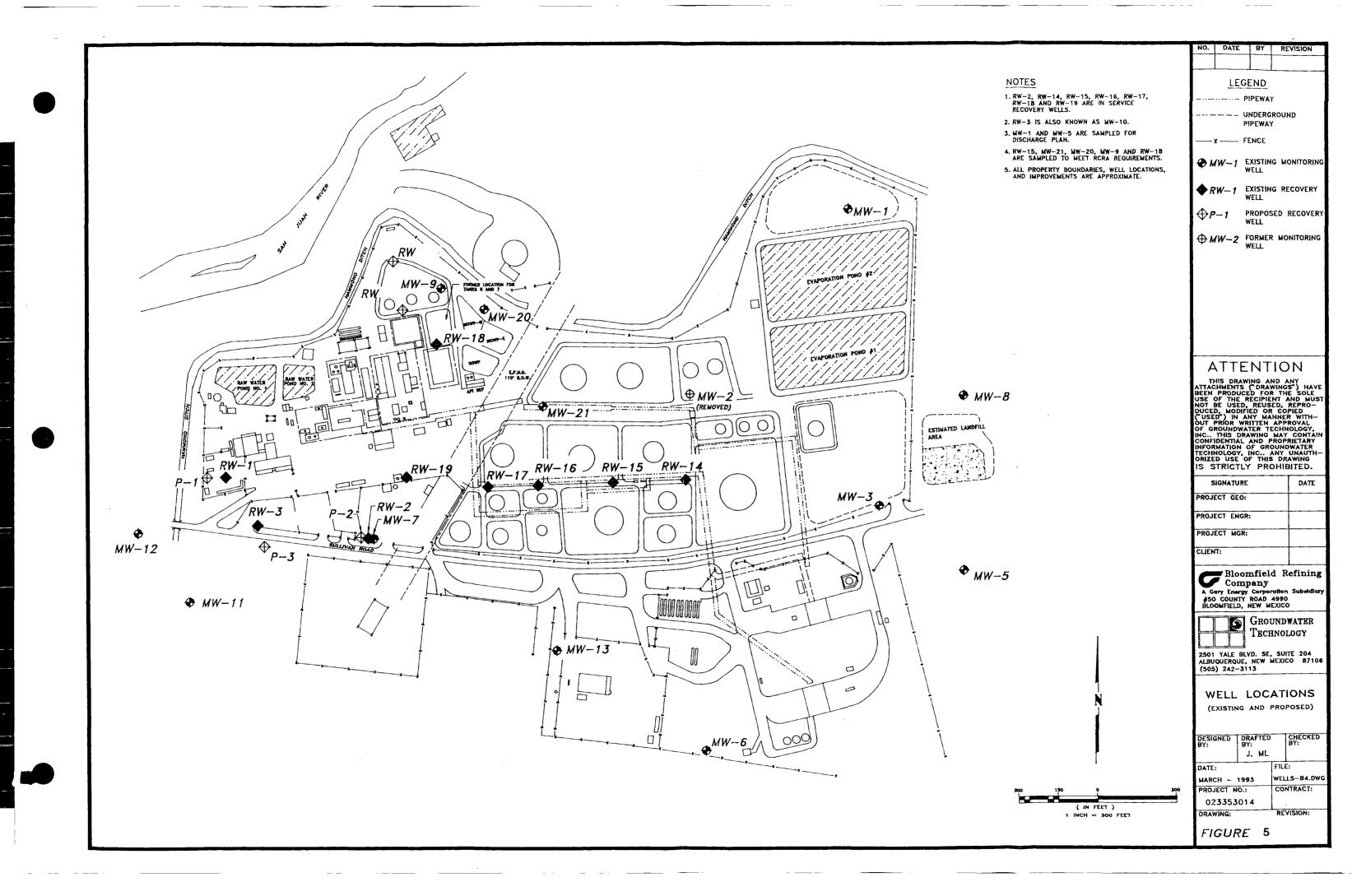


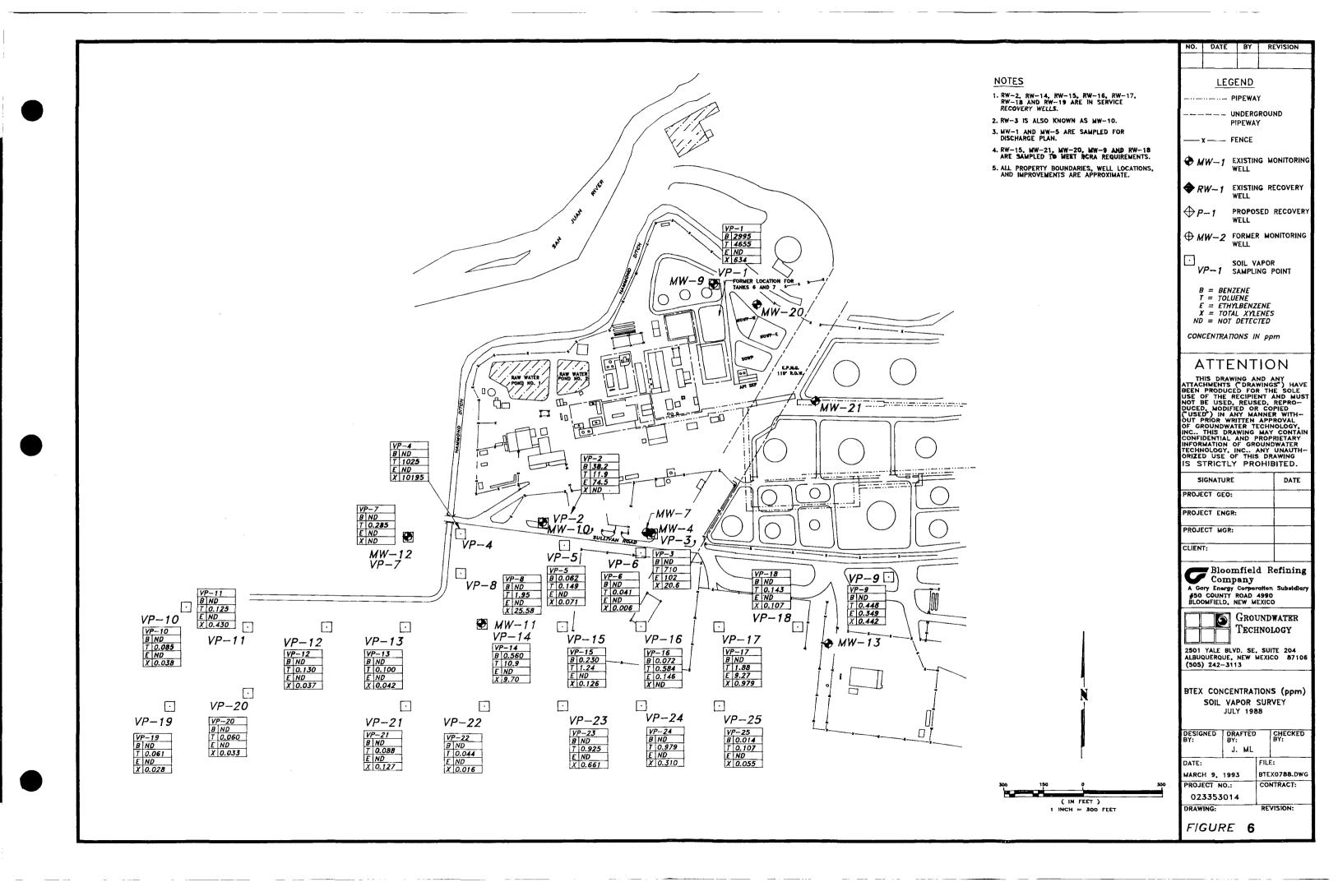


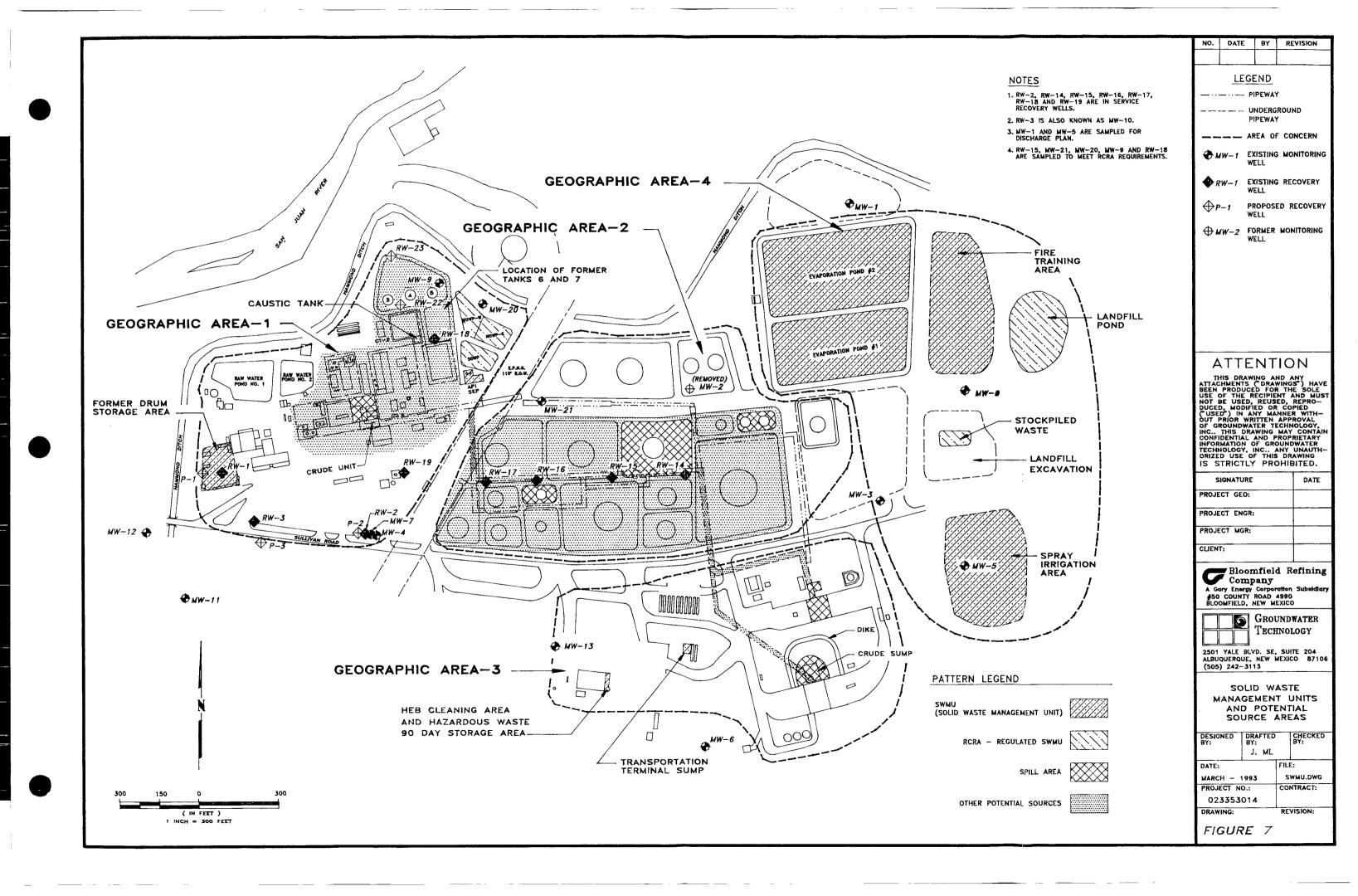


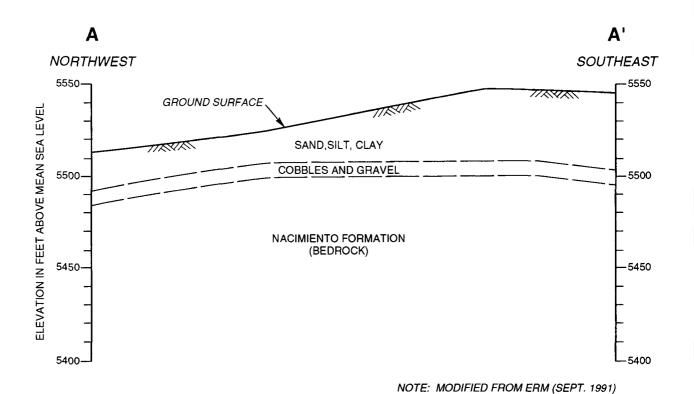


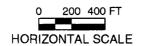


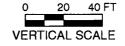


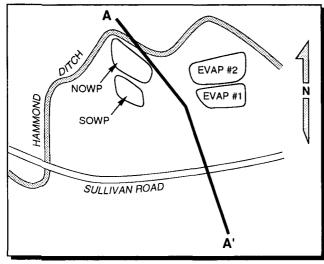




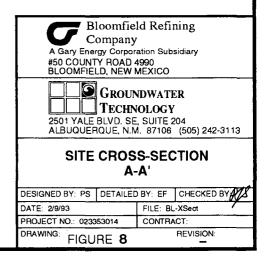


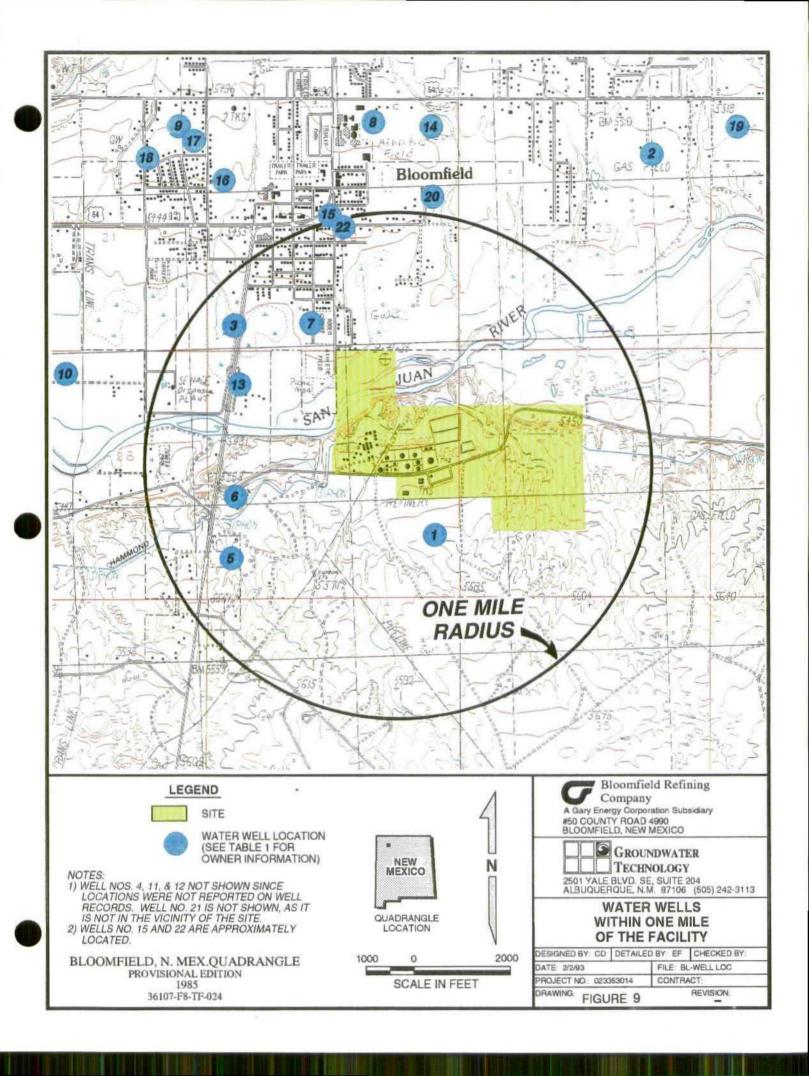


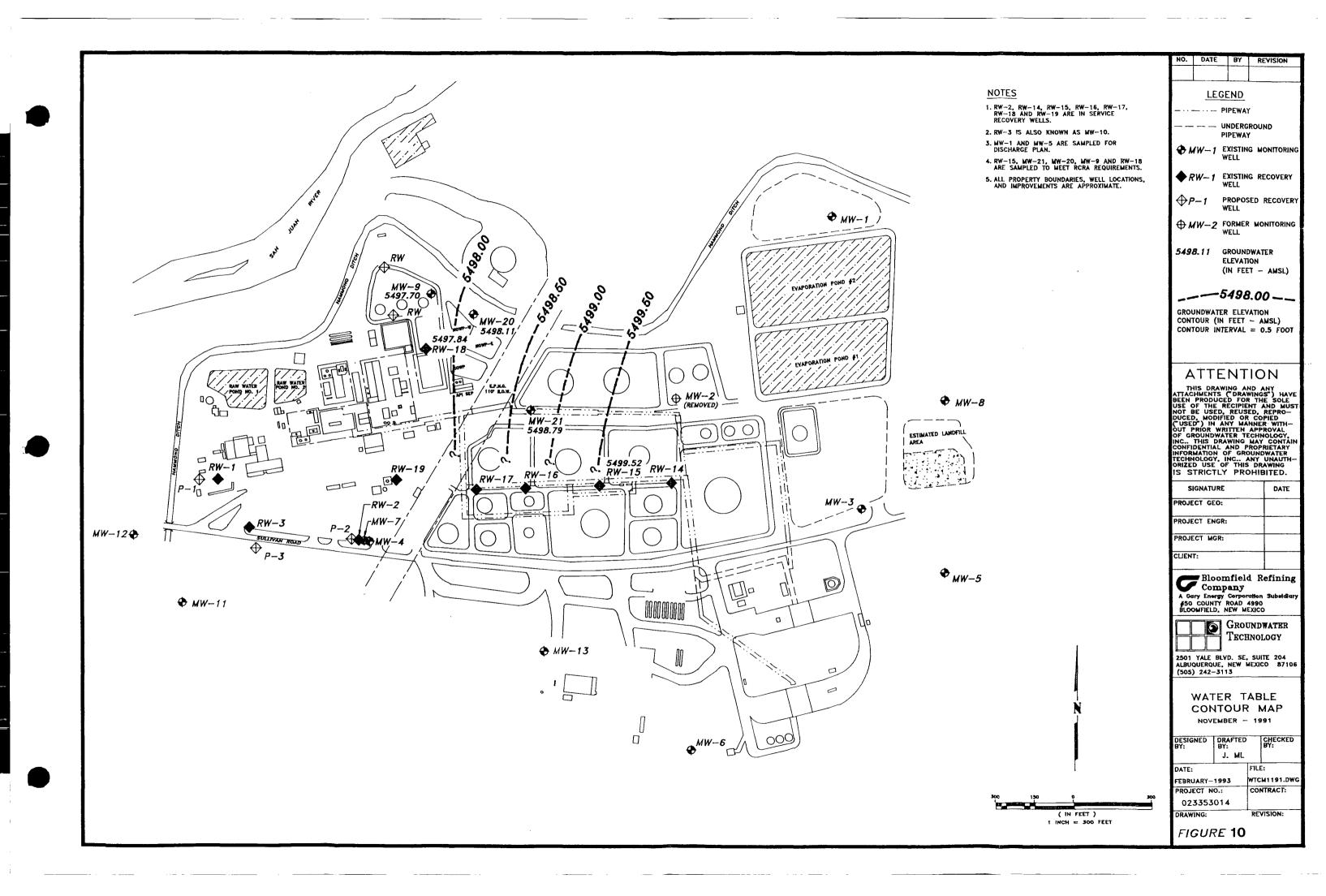


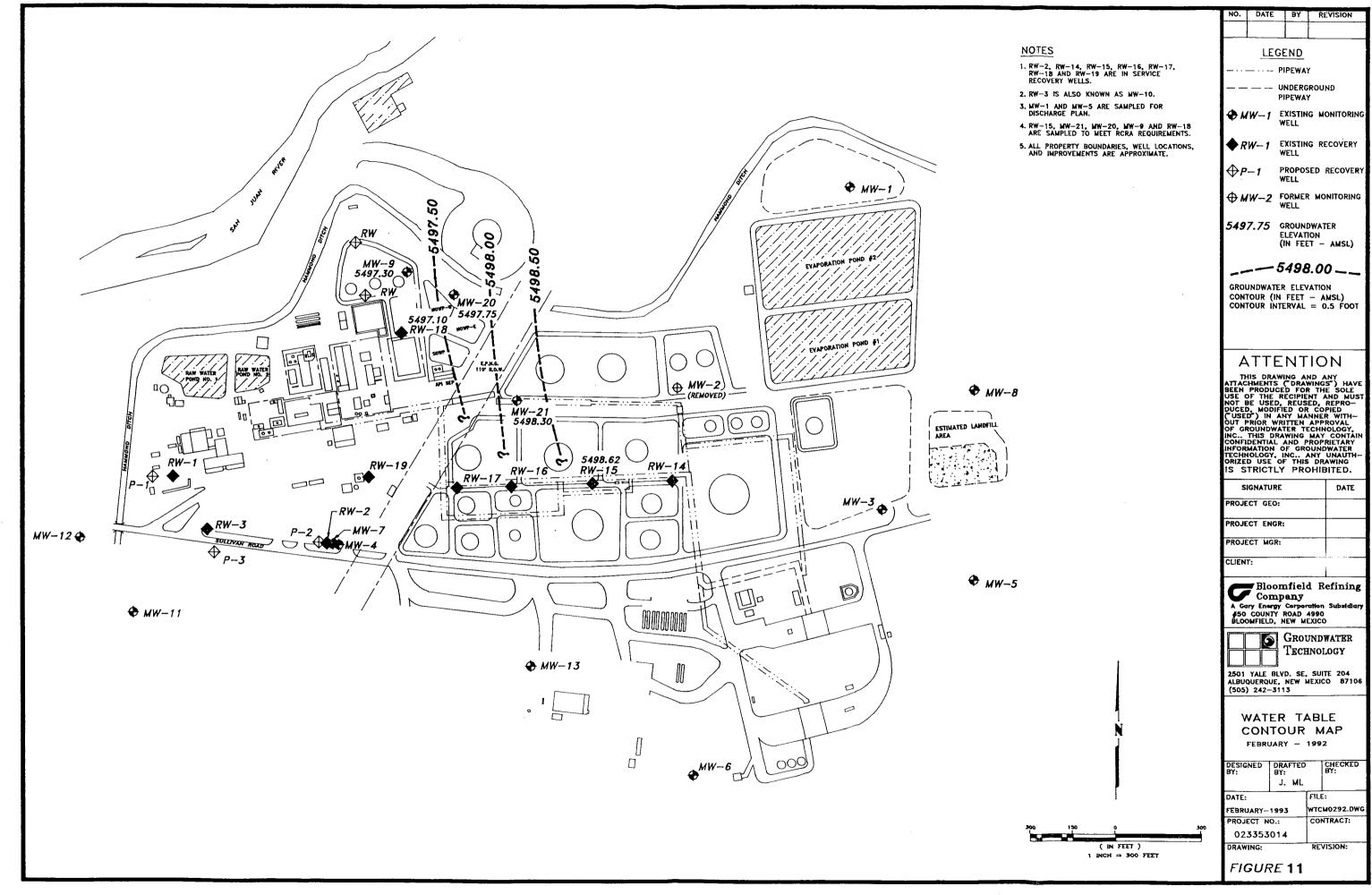


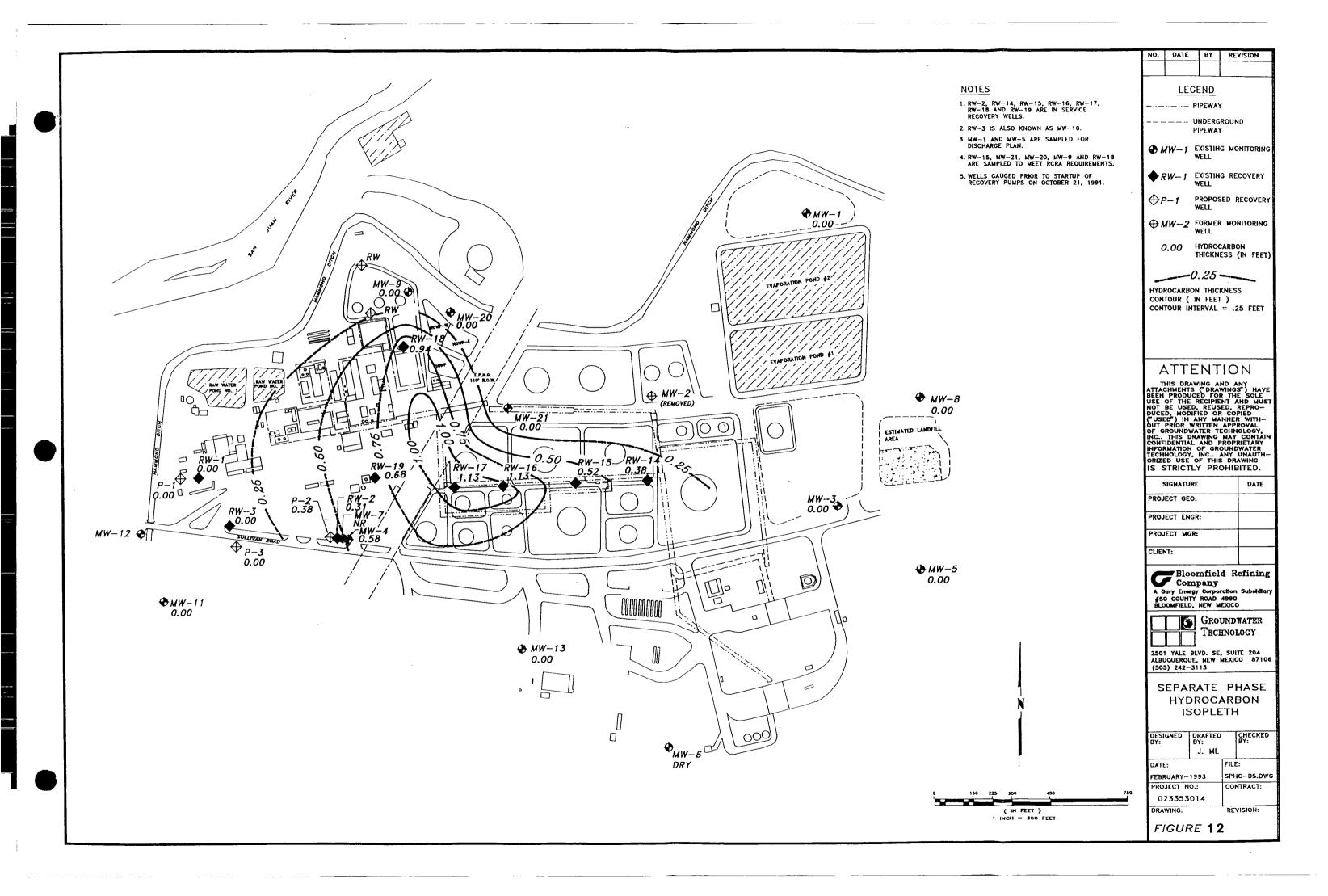
SITE CROSS-SECTION LOCATION MAP











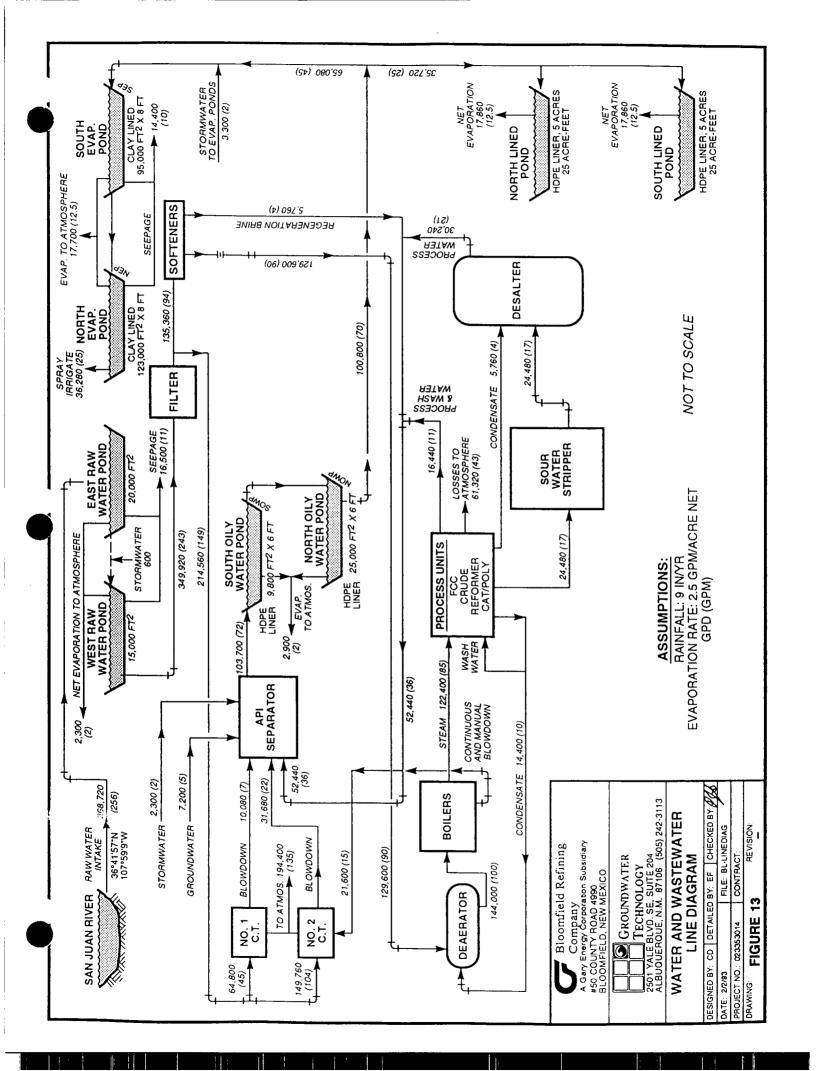


TABLE 1

SUMMARY OF HAZARDOUS WASTES GENERATED AT BLOOMFIELD REFINING COMPANY, BLOOMFIELD, NEW MEXICO

HAZARDOUS WASTE	USEPA REASON FOR LISTING	AMOUNT GENERATED
Heat exchanger bundle (HEB) cleaning sludge (K050)	Hexavalent chromium	5,000 lb/3 yrs
API separator sludge (K051)	Hexavalent chromium & lead	250,000 lb/2 yrs
Leaded tank bottoms (K052)	Lead	8,000 lb/tank/5 yrs
1,1,1-Trichloroethane and methanol in naphtha (D001, F002)	Ignitable, spent halogenated solvent	None Recent - Potential Waste
Process Waste Water Containing Benzene (D018)	Benzene	108,800 gal/day
Spent Solvent (D001)	Ignitable	2,000 lb/yr

SOURCE:

"Part B Operating Permit Application for Surface Impoundments," ERM, September 25, 1991.

"Preliminary Review Report/Visual Site Inspection," EPA Contract No. 68-01-7251, August 25, 1987.

GROUNDWATER TECHNOLOGY

TABLE 2

MONITORING WELL SPECIFICATIONS
BLOOMFIELD REFINING COMPANY
BLOOMFIELD, NEW MEXICO

WELL	INSTALL	GRADE	TOC	TOP SCRN	BOT SCRN	TOTAL
ID	DATE	ELEV (FT)	ELEV (FT)	ELEV (FT)	ELEV (FT)	DEPTH (FT)
MW-1	8-Feb-84	5514.07	5515.77	5511.12	5491.12	24.65
MW-2	8-Feb-84	5517.95	5519.45	5512.55	5492.55	26.90
MW-3	9-Feb-84	5534.85	5535.85	5516.50	5496.50	39.35
MW-4	9-Feb-84	5522.90	5524.30	5511.80	5491.80	32.50
MW-5	6-Feb-84	5544.10	5545.10	5513.49	5493.49	51.61
MW-6	7-Feb-86	5549.63	5551.23	5521.60	5501.60	49.63
MW-7	25-Feb-86	5522.99	5524.09	5473.98	5463.98	62.11
MW-8	28-Feb-86	5530.12	5531.12	5518.18	5498.18	34.94
MW-9	3-Mar-86	5518.00	5519.70	5507.71	5487.71	33.99
RW-1	31-Aug-88	5524.52	5525.92	5507.12	5491.52	40.98
P-1	30-Aug-88	5523.82	5524.62	5503.32	5487.32	42.45
RW-2	29-Aug-88	5522.98	5523.48	5506.98	5491.28	38.03
P-2	29-Aug-88	5522.93	5523.73	5506.33	5491.03	38.33
RW-3	4-Mar-86	5515.46	5516.86	5504.93	5484.93	33.93
P-3	1-Sep-88	5506.40	5507.20	5500.85	5490.40	22.80
MW-11	31-Jul-87	5503.23	5506.83	5498.23	5488.23	24.73
MW-12	1-Aug-87	5495.86	5498.36	5491.86	5481.86	14.22
MW-13	3-Sep-88	5535.12	5538.42	5509.59	5493.82	53.00
RW-14	6-Aug-90	5532.07	5533.97	5510.97	5492.97	43.00
RW-15	7-Aug-90	5531.62	5533.32	5509.92	5491.92	43.40
RW-16	7-Aug-90	5530.19	5531.99	5508.89	5490.89	43.10
RW-17	7-Aug-90	5528.83	5530.43	5508.88	5490.88	41.55
RW-18	8-Aug-90	5523.45	5527.05	5506.10	5488.10	40.95
RW-19	8-Aug-90	5525.58	5527.08	5510.38	5492.38	36.70
MW-20	13-Sep-91	5514.64	5516.44	5506.26	5491.26	27.18
MW-21	16-Sep-91	5517.04	5518.64	5504.71	5489.71	30.93

SOURCE: Bloomfield Refining Company Groundwater Sampling and Analysis Plan, NMD 089-416-416, 1991



GROUNDWATER
TECHNOLOGY

TABLE 3 (Page 1 of 3)

SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS FINAL CLOSURE PLAN FOR THE API WASTEWATER PONDS, LANDFILL, AND LANDFILL PONDS BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

MEK	Ž	Ę	Ę	Ę	Ę	Σ	Ŗ	Z	눌	Ę	Z
TOTAL	QN	Q	Q	Q	Q	Q	Q	Q	Q	Q	QV
TOLUENE	QN	Q	ð	Q.	Q	Q	Q	Q	Q	Q	QV
ETHYLBENZENE	QN	Q	Q	Q	QV	Q	Q	Q	Q	QV	QN
BENZENE	QN	Q	Q	Q	Q	Q	Q.	Q	Q.	Q	Q
- Pb	10	8.6	0.6	6.7	7.6	7.0	8.2	7.7	9.0	8.5	6.8
Ğ	11	8.9	6.6	7.6	7.8	7.4	9.1	7.0	6.2	6.1	7.8
PHENOLICS	QN	Q	Q	Q.	Q	Q	Q	Q	Q.	Q	Q
DATE SAMPLED	10/16/85	10/16/85	10/16/85	10/16/85	10/16/85	10/16/85	10/16/85	10/16/85	10/16/85	10/16/85	10/16/85
SAMPLE LOCATION	L1 & L2, 0-6" Quadrant # 1 - Landfill	L3 & L4, 6-12" Quadrant # 1 - Landfill	L5 & L6, 0-6" Quadrant # 2 - Landfill	L7 & L8, 6-12" Quadrant # 2 - Landfill	L9 & L10, 0-6" Quadrant # 3 - Landfill	L11 & L12, 6-12" Quadrant # 3 - Landfill	L13 & L14, 0-6" Quadrant # 4 - Landfill	L15 & L16, 6-12" Quadrant # 4 - Landfill	LP1 & LP2, 0-6" Points 1&2 @ Landfill Pond	LP3 & LP4, 6-12" Points 1&2 @ Landfill Pond	LP5 & LP6, 0-6" Points 3&4 @ Landfill Pond
SAMPLE NO.	51469-01	51469-02	51469-03	51469-04	51469-05	51469-06	51469-07	51469-08	51469-09	51469-10	51469-11



TABLE 3 (Page 2 of 3)

SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS FINAL CLOSURE PLAN FOR THE API WASTEWATER PONDS, LANDFILL, AND LANDFILL PONDS BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

MEK	뉟	Z	Ę	Q	0.053	Ę	¥	Ż	E	ΙΝ	LN L
TOTAL	Q	Q	Q	Q	2	0.0074	Q	QN	Q	Q	Q
TOLUENE	QV	ΩN	Q	QN	Q	Q	QV	QN	QN	Q	QN
ETHYLBENZENE	QN	Q	Q	Q	QV	Q	Q	Q	Q	QN	ΩN
BENZENE	Q	0.0013	Q	QN	Q	2	9	Q.	<u>Q</u>	Q	QN
Pp	12	12	13	4	4	s	s	5	4	5.1	5.9
IJ	10	8.0	7.8	2.3	2.4	4.4	5.3	5.5	14	8.8	27
PHENOLICS	Q	Q	Q	Q	Q	Q	Q	Q	QN	Q	QN
DATE SAMPLED	10/16/85	10/16/85	10/16/85	10/16/85	10/16/85	10/15/85	10/15/85	10/15/85	10/15/85	10/15/85	10/15/85
SAMPLE LOCATION	LP7 & LP8, 6-12" Points 3&4 @ Landfill Pond	LP9 & LP10, 0-6" Points 5&6 @ Landfill Pond	LP11 & LP12, 6-12" Points 5&6 @ Landfill Pond	LP13 & LP14, 0-6" S. Evaporation Pond Landfill Pond	MS1 & MS2, Mystery Sample	APS1 & APS2, 0-6" NE & SE of SOWP	APS3 & APS4, 6-12" NE & SE of SOWP	APS5 & APS6, 0-6" N & S of SOWP	APS7 & APS8, 6-12" N & S of SOWP	APS9 & APS10, 0-6" NW & SW of SOWP	APS11 & APS12, 6-12" NW & SW of SOWP
SAMPLE NO.	51469-12	51469-13	51469-14	51469-15	51469-16	51469-17	51469-18	51469-19	51469-20	51469-21	51469-22

GROUNDWATER
TECHNOLOGY

TABLE 3 (Page 3 of 3)

SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS
FINAL CLOSURE PLAN FOR THE API WASTEWATER PONDS,
LANDFILL, AND LANDFILL PONDS
BLOOMFIELD REFINING COMPANY
BLOOMFIELD, NEW MEXICO

MEK	<u>Q</u>	TN	LN.	TN	LN	L	IN
TOTAL XYLENES	QV	QN	QN	QN	QN	QN	QN
TOLUENE	Q	ON	ON.	QN	QN	QN	QN
ETHYLBENZENE	QV	QN	Q	QN	Q	QN	QN
BENZENE	QN	Q	Q.	QN	Q	QN	QN
Pb	6.0	4	3	5	ဗ	8	7
Cr	6.4	7.8	3.2	3.6	2.3	2.9	12
PHENOLICS	QN	Q	QN	QN	Q	QN	QN
DATE SAMPLED	10/15/85	10/15/85	10/15/85	10/15/85	10/15/85	10/15/85	10/15/85
SAMPLE LOCATION	APS13, 0-6" SE near influent SOWP	APN1 & APN2, 0-6" NE & SE of NOWP	APN3 & APN4, 6-12" NE & SE of NOWP	APN5 & APN6, 0-6" NE & SE of NOWP	APN7 & APN8, 6-12" N & S of NOWP	APN9 & APN10, 0-6" NW & SW of NOWP	APN11 & APN12, 6-12" NW & SW of NOWP
SAMPLE NO.	51469-23	51469-24	51469-25	51469-26	51469-27	51469-28	51469-29

ND= not detected NT= not tested Samples 51469-15, 51469-16 and 51469-23 also analyzed for VOCs (USEPA method 8240) and BNAs (USEPA method 8270).

Only compounds detected are reported.

Analyses performed by Rocky Mountain Analytical Laboratory.

SOURCE: "Final Closure Plan for API Wastewater Ponds, Landfill and Landfill Pond at the Bioomfield Refinery," Engineering-Science, Inc., July 1986.

TABLE 4 (Page 1 of 2)

SUMMARY OF SURFACE WATER SAMPLE ANALYTICAL RESULTS BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO APRIL 1986 - JULY 1987

e		_															_		
San Juan River	Upstream	24. July 1987					2	9				2	2	2	皇	2	2	2	0.018
San Juan River	Hwy 44 Bridge Farside	24. July 1987					S	2				2	2	2	2	2	2	2	0.013
San Juan River	Hwy 44 Bridge Middle	24. July 1987					Ω	2				2	2	2	2	2	2	2	QN
San Juan River	Hwy 44 Bridge Near Side	24. July 1987					2	2				2	2	2	2	9	9	2	0.018
Hammond Ditch	Near Sullivan Road (D64)	28. April 1986					Q	Q				9	2	2	윤	9	2	2	0.002
Hammond Ditch	Near API Waste Ponds (U6A)	28. April 1986					Q	2				2	2	2	2	2	9	Q	0.003
Hammond Ditch	Near API Ponds (HAPI)	22. April 1986			_		Q	2				2	2	2	0.001	2	2	2	0.002
Hammond Ditch	Near Sullivan Rd. (HSRD5)	22. April 1986					0.006	0.003				900'0	0.003	0.005	2	0.013	0.007	0.008	0.002
SAMPLE LOCATION	SAMPLE ID	SAMPLE DATE		ANALYTES		VOLATILE ORGANIC	Benzene	Toluene	SEMIVOLATILE	ORGANIC	COMPOUNDS	Anthracene	Benzo(a)anthracene	Chrysene	Fluoranthene	Naphthalene	Phenanthrene	Pyrene	PHENOLS

TABLE 4 (Page 2 of 2)

BLOOMFIELD REFINING COMPANY SUMMARY OF SURFACE WATER SAMPLE ANALYTICAL RESULTS BLOOMFIELD, NEW MEXICO APRIL 1986 - JULY 1987

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San Juan River	Upstream	24. July 1987						Q	0.044	232	4.46	62.4	S
San Juan River	Hwy 44 Bridge	Parside 24. July 1987						2	0.053	248	4.96	64.9	9
San Juan River	Hwy 44 Bridge	Middle 24. July 1987						0.054	0.038	228	4.96	75.0	2
San Juan River	Hwy 44 Bridge	Near Side 24. July 1987						0.061	990.0	238	4.96	64.5	S
Hammond Ditch	Near Sullivan	Road (D64) 28. April 1986					-	¥	Į.	ħ	Ä	¥	۲
Hammond Ditch	Near API Waste	28. April 1986						Z	Ę	Ŋ	IN	Z	ĮN.
Hammond Ditch	Near API Ponds	(HAPI) 22. April 1986						2	Q	N	¥	Ł	¥
Hammond Ditch	Near Sullivan Rd. Near API Ponds	(HSRD5) 22. April 1986						Q	QN	LN	IN	IN	ħ
SAMPLE LOCATION Hammond Ditch Hammond Di	SAMPLEID	SAMPLE DATE			ANALYTES		METALS	Lead	CN	TDS	ت ت	804	TOC

Units= mg/l (approximately equivalent to parts per million (ppm)). ND= not detected

NT= not tested

CN = Cyanide TDS = Total Dissolved Solids

CI = Chloride

SO4 = Sulfate

TOC = Total Organic Carbon

Samples analyzed by Assaigai Analytical Laboratories (Albuquerque, NM) by SW-846 test methods. Only compounds detected are reported.

SOURCE

"A Final Report on Section 3013 Administrative Order Work Elements", Engineering-Sciences, Inc., February 8, 1987. Correspondence from Richard Traylor of BRC to William Taylor, Jr. of USEPA dated September 14, 1987.

SUMMARY OF ORGANIC GROUNDWATER ANALYTICAL DATA BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

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SUMMARY OF ORGANIC GROUNDWATER ANALYTICAL DATA BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

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SUMMARY OF ORGANIC GROUNDWATER ANALYTICAL DATA BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

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TABLE 5 (Page 4 of 4)

SUMMARY OF ORGANIC GROUNDWATER ANALYTICAL DATA BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

> ND= Not Detected NT=Not Tested

Units=mg/l (approximately equivalent to parts per million (ppm)).

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B=Benzene

E=Ethylbenzene X=total Xylenes T=Toluene

Total Phen=Total Phenols EDC=1, 2-Dichloroethane

2, 4-DMP=2, 4-Dimethytphenol 4, 6-DNC=4, 6-Dinitro-o-cresol 2, 4-DCP=2, 4-Dichlorophenol

2, 4-DNP=2, 4-Dinitro-phenol

4-NP=4-Nitrophenol

2-NP=2-Nitrophenol

A-NAPH=Acenaphthene PYR=Pyrene

NAPH=Yaphthalene 2-CHLRPHEN=2-Chloro-phenol FLUORANTH=Fluoranthene TOC=Total Organic Carbon

TOX=Total Organic Halogens

CHRY=Chrysene P-C-M-C=P-chloro-m-cresol BENZFLUOR=Benzo(fyfluoranthene

FLUOR=Fluorene

BENZANTH=Benzo(a)anthracene

PHENE=Phenol

SUMMARY OF INORGANIC GROUNDWATER AND WATER QUALITY DATA BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

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SUMMARY OF INORGANIC GROUNDWATER AND WATER QUALITY DATA BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

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SUMMARY OF INORGANIC GROUNDWATER AND WATER QUALITY DATA BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

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WELL	MW-13	MW-20			1000	7			RW-1		P-1	RW-2		P-2		RW-3	P-3		RW-15		_		RW-18			





SUMMARY OF INORGANIC GROUNDWATER AND WATER QUALITY DATA BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO

TABLE 6 (Page 4 of 4)

NT = Not Tested
ND = Not Detected
Units = mg/l (approximately equivalent to parts per million [ppm])

KEY:

Cn = Cyanide TDS = Total Dissolved Solids

C = Chloride
SO4 = Suffate
SD = Antimory
As = Arsenic
Be = Beryllium
Cd = Cadmium
Cr = Chromium Pb = Lead

Zn = Zinc
Al = Aluminum
Ba = Barium
Ba = Barium
Ba = Barum
Fe = Iron
Mo = Molybbenum
Mn = Manganese
Na = Sodium
N = Nitrogen
F = Fluoride
Coli = Coliform
Ra 226 = Radium 226
Ra 228 = Radium 228

Hg = Mercury Ni = Nickel

TABLE 7

SOIL VAPOR SURVEY RESULTS BLOOMFIELD REFINING SOMPANY BLOOMFIELD, NEW MEXICO **JULY 1988**

POINT OR	POINT OR X(FT)(a)	Y(FT)(b)		_	CONCENTRATION (ppm)			
SAMPLE			BENZENE	TOLUENE	ETHYLBENZENE	TOTAL XYLENES	PCE	TCE
1(MW-9)	009	1070	2995	4655	QN	634	110	Q
2(MW-10)	150	350	38.2	11.9	74.5	Q	2	2
3(MW-4)	570	350	Ω	710	102	20.6	78	2
4	0	300	õ	1025	2	10195	Q	2
5	300	300	0.062	0.149	Q	0.071	0.011	2
ဖ	900	300	Q	0.041	Q	9000	Q	0.086
7(MW-12)	-610	150	2	0.285	Q	2	Q	2
ω	0	150	2	1.95	Q	25.58	۵	6.49
6	1200	150	Q	0.448	0.349	0.442	0.513	0.38
10	-1200	0	Q	0.085	Q	0.038	Q.	0.034
11	006-	0	2	0.125	Q	0.43	Q	2.14
12	-600	0	Q	0.13	Q	0.037	Q	Ω
13	-300	0	2	0.1	Q	0.042	Ω	0.037
14(MW-11)	0	0	0.56	10.9	Q	9.7	2	2
15	300	0	0.23	1.24	Q	0.126	Q	Ω
16	009	0	0.072	0.584	0.146	Q	Q	Ω
17	006	0	Q	1.88	9.27	0.979	Q	23.8
18	1200	0	S	0.143	<u>Q</u>	0.107	0.003	0.082
19	-1200	-300	S	0.061	<u>Q</u>	0.028	0.002	0.003
20	006-	-200	Q	90.0	Ω <u></u>	0.033	0.004	0.072
21	-300	-300	Q	0.088	<u>Q</u>	0.127	Q	0.033
22	0	-300	Ω	0.044	Q	0.016	Q	Q Q
23	300	-300	Ω	0.925	Q	0.661	Ω	Q Q
24	009	-300	Q	0.979	Q	0.31	ΩN	2
25	006	-300	0.014	0.107	QN	0.055	900.0	0.067

ND = not detected

approximate distance east from well MW-11

(a) approximate distance east from well MW-11
 (b) approximate distance north from well MW-11
 SOURCE: "Final Report on Soil Vapor Survey, Well Installation and Hydrocarbon Recovery System", Geoscience Consultants, Ltd. August 1989.

TABLE 8	WATER WELLS WITHIN ONE MILE RADIUS	BLOOMFIELD REFINING COMPANY	BLOOMFIELD, NEW MEXICO
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1. SJ-2148 C.W. Wooten P.O. Bloc Bloc Bloc Bloc Bloc Bloc Bloc Bloc	00100.	10011001	ķ			
SJ-2148 C.W. Wooten SJ-1870 D.E. Walters SJ-2026 S. Hinsen SJ-2121 H. Chatto SJ-700 E.H. Brown	ADDRESS	EUCATION	DAIE	ТОТАL БЕРТН	CASING	SCREEN
SJ-1870 D.E. Walters SJ-2026 S. Hinsen SJ-2121 H. Chatto SJ-700 E.H. Brown	oten P.O. Box 1841 Bloomfield, NM 87413	S 1/2, NE 1/4, SE 1/2 Section 27 Twp 29 N Range 11-W	Nov. 1987	305'	7" steel to 39.5' 4" PVC to 266'	266'-306'
SJ-2026 S. Hinsen SJ-2121 H. Chatto SJ-700 E.H. Brown	ters P.O. Box 2131 Bloomfield, NM 87413 Tract 2	NE 1/4 Section 23 Twp 29 N Range 11-W	Aug. 1984	58,	6" steel to 58'	None
SJ-2121 H. Chatto SJ-700 E.H. Brown		SW 1/2, SW 1/4, Section 22 Twp 29 N Range 11-W	Jan. 1986	27.	6 5/8" steel to 21'	21' to 26'
SJ-700 E.H. Brown	Lot 10, Huntington Circle, Bloomfield, NM 87413	Not Reported	July 1987	30,	7" steel to 21'	21' to 26'
	wn Rt #1, Box 248, Aztec, NM 87410	SW 1/4, SW 1/4, NW 1/4 Section 27 Twp 29 N Range 11-W	July 1978	20,	7" steel to 20'	None
6. SJ-2210 D.C. Looney P.O. Bloc 874	ney P.O. Box 2462 Bloomfield, NM 87413	S 1/2, NW 1/4, NW 1/4 Section 27 Twp 29 N Range 11-W	Dec. 1988	32,	6" PVC to 22'	22'-32'

TABLE 8
WATER WELLS WITHIN ONE MILE RADIUS
BLOOMFIELD REFINING COMPANY
BLOOMFIELD, NEW MEXICO
(Continued)

	PERMIT NUMBER	WELL OWNER	ADDRESS	LOCATION	DATE	TOTAL DEPTH	CASING	SCREEN
7.	SJ-695	W.N. Wampler	P.O. Box 2386 Bloomfleld, NM 87413, Lot 14, Block 2 of the Bloomfleld Southside Add	SW 1/4, SE 1/4 Section 22 Twp 29 N Range 11-W	July 1978	34'	6° to 24'	24'to 34'
8.	SJ-796	T.P. Johnson	Tract A, Loma Addition, Bloomfield, NM 87413	NE 1/4, NW 1/4 Section 22 Twp 29 N Range 11-W	Mar. 1979	50'	5.5" to 40'	40' to 48'
ර	SJ-701	G.T. Rodriguez	P.O. Box 1071 Bloomfield, NM 87413, Lot 16, Green Valley Estates	NE 1/4, NE 1/4 Section 21 Twp 29 N Range 11-E	July 1978	70,	6 5/8" to 70'	None
10.	SJ-2330	R.H. Phelps	P.O. Box 2548 CR 5005 #65 A, Bloomfield, NM 87413	NW 1/4, NE 1/4 Section 28 Twp 29 N Range 11-W	Sept. 1991	128'	5" PVC to 107'	107' to 127'
11.	SJ-2195	M. Aronson	Bloomfield, NM 87413	Not Reported	Nov. 1988	70,	6" to 65'	65' to70'
12.	SJ-2182	M. Faverino	116 Road 5010 Bloomfield, NM 87413	Not Reported	July 1988	27'	7" to 22'	22' to 26'

TABLE 8 WATER WELLS WITHIN ONE MILE RADIUS BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO (Continued)

	PERMIT NUMBER	WELL OWNER	ADDRESS	LOCATION	DATE	TOTAL DEPTH	CASING	SCREEN
13.	SJ-2227	Y. Chavez	P.O. Box 1412 Bloomfield, NM 87413 Huntington Circle	NW 1/4, NW 1/4 Section 27 Twp 29 Range 11-W	July 1989	27'	7" to 20'	20' to 24'
14.	SJ-704	C.W. Jaramillo	P.O. Box 594 Bloomfield, NM 87413 Lot 2&3, Blk 4 -	NE 1/4, NE 1/4 Section 22 Twp 29 N Range 11-W	July 1978	55'	6" Plastic to 35'	35' to 55'
15.	SJ-484	G.A. Chacon	P.O. Box 634 Bloomfleld, NM 87413	Section 22 Twp 29 Range 11	Oct. 1977	37'	6 3/8" to 28'	28' to 34'
16.	SJ-320	M. Wileman	P.O. Box 503 Bloomfleld, NM 87413	NW 1/4, SW 1/4, NW 1/4 Section 22 Twp 29 Range 11	Sept. 1977	38,	6 3/8" steel to 25'	25' to 36'
17.	SJ-1888	G.P. McKeown	P.O. Box 641 Bloomfield, NM 87106 Hwy 64, West- Broadway	NE 1/4, NE 1/4, SE 1/4 Section 21 Twp 29 Range 11	Sept. 1984	47'	7" steel to 38'	38' to 40'

TABLE 8 WATER WELLS WITHIN ONE MILE RADIUS BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO (Continued)

	PERMIT NUMBER	WELL	ADDRESS	LOCATION	DATE	TOTAL	CASING	SCREEN
8.	HC-124885	S.C. Byland	303 Chestnut, P.O. Box 11 Bloomfield, NM 87413, Lot 9, Blk 4, Wade Grand View Subdivision	NE 1/2 Section 21 Twp 29 Range 11-W	May 1985	65'	7" steel to 50'	50' to 55'
19.	SJ-1962	J.Cadvain	P.O. Box 649 Bloomfleld, NM 87413	NW 1/4, NW 1/4 Section 24 Twp 24 Range 11-W	Aprl. 1985	45'	7" steel to 36'	36' to 39'
20.	SJ-2138	M. Gilbert	309 S.Johnson Bloomfield, NM 87413, Lot 6, Blk 5, Turner No.2	NE 1/4, SE 1/4 Section 22 Twp 29 N Range 11-W	June 1987	40,	7" steel to 35'	35' to 39'
21.	SJ-804	C.J. Dunson	Star Route 3 Box 142-B Bloomfield, NM 87413	W 1/4 Section 25 Twp 29 N Range 11-W	Oct. 1978	37'	6" to 37'	
22.	SJ-1974	A.R. Carpenter	700 South Turner Box 16 Bloomfield, NM 87413, Lot 2, Blk 4, Southside Add	Section 22 Twp 29 N Range 11-W	June 1985	47'	6" steel to 27' 5" PVC	27' to 31' 30' to 47'

TABLE 9

CLIMATOLOGICAL DATA SUMMARY BLOOMFIELD REFINING COMPANY BLOOMFIELD, NEW MEXICO 1951-1980

	TEMPERATUR	RE (°F) MEANS		PRECIPITATI	ON (INCHES)
	DAILY MAX.	DAILY MIN.	MONTHLY	MEAN	SNOW-MEAN
JANUARY	40.7	17.8	29.3	0.59	4.3
FEBRUARY	48.1	23.0	35.6	0.44	2.1
MARCH	56.3	28.4	42.4	0.66	1.7
APRIL	66.6	35.5	51.1	0.55	0.5
MAY	77.0	44.5	60.8	0.41	0
JUNE	88.5	53.5	71.0	0.28	0
JULY	92.7	60.1	76.4	0.93	0
AUGUST	89.3	58.3	73.8	1.27	0
SEPTEMBER	82.3	50.6	66.5	0.83	0
OCTOBER	70.0	39.3	54.6	1.16	0
NOVEMBER	53.8	27.5	40.7	0.64	1.0
DECEMBER	42.7	18.8	30.8	0.61	4.6
YEAR	67.3	38.1	52.8	8.37	14.2

Reference: National Climatological Data Center (NCDC, 1984)

SOURCE:

"Preliminary Review Report/Visual Site Inspection" EPA Contract No. 68-01-7251,

August 25, 1987.



APPENDIX A SPILL REPORTS

BRC/task1.rep





March 18, 1991

Mr. Charles Gholson Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Mr. David Boyer Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87501

Gentlemen:

Attached is a subsequent notification of a spill that occurred at Bloomfield Refining Company on March 8, 1991. Approximately 180 barrles of Jet A (kerosene) were spilled inside a tank dike. The spilled material was immediately recovered by vacuum truck.

Please call me if you need additional information.

Sincerely,

Chris Hawley

Environmental Engineer

CHOB Howing

CH/jm

Enclosure

cc: Richard Traylor
Gerald Collins
Chad King
Joe Warr
John Goodrich

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August 28, 1989

Mr. Charles Gholson Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Mr. David Boyer Land Office Building P. O. Box 2088 Santa Fe. New Mexico 87501

Gentlemen:

Attached is a subsequent notification of a spill that occurred at Bloomfield Refining Company on August 27, 1989. Approximately 100 barrels of gasoline blend intermediate and water were spilled inside a tank dike. The spilled material was immediately recovered by vacuum truck.

Please call me if you need additional information.

Sincerely,

Chris Hawley

Environmental Engineer

CH/jm

Enclosure

cc: Richard Traylor Mike Macy Chad King Joe Warr

Junk 22 will be slopeds Junk service from API. Just to API.

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

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CIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY



July 25, 1989

Mr. Charles Gholson Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Mr. David Boyer Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87501

Gentlemen:

Attached is a subsequent notification of a minor spill and fire that occurred at Bloomfield Refining Company on July 24, 1989 at 8:30 p.m. The spill and fire resulted when the flare discharged liquids that caught on fire. The fire was put out with dry chemicals which minimized dispersion of hydrocarbons. The only losses were from burning. Liquids were collected in the flare sump.

Please call me if you need additional information.

Sincerely yours,

Chris Hawley

Environmental Engineer

CH/jm

cc: Richard Traylor Mike Macy Chad King Joe Warr

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

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** ATTACH ADDITIONAL SHEETS IF NECESSARY

CIFY



September 18, 1987

Mr. Frank Chavez Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Mr. David Boyer Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87501

Gentlemen:

Attached is a subsequent notification of a minor spill of 10 barrels of slop oil that occurred at Bloomfield Refining Company on September 12, 1987. The spill was contained inside a diked area and immediately cleaned up, resulting in little or no loss.

Please call me if you need additional information.

Sincerely,

Chris Hawley

Environmental Engineer

CH/jm

Attachment

cc: Richard Traylor Chad King Mike Macy

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_			/			_	-				



March 2, 1987

Mr. Frank Chavez Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Mr. David Boyer Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87501

Gentlemen:

Attached is a notification of a spill of 290 barrels of regular gasoline that occurred at Bloomfield Refining Company on February 24, 1987. The spill occurred inside a tank dike.

Please call me if you need additional information.

Sincerely,

Chris Hawley

Environmental Engineer

Cansitrum,

CH/jm

Enclosure

cc: Richard Traylor

Mike Macy Chad King

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July 25, 1986

Mr. Frank Chavez Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Mr. David Boyer Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87501

Gentlemen:

Attached is a subsequent notification of a minor spill of 20 barrels of naphtha that occurred at Bloomfield Refining Company on July 24, 1986. The spill occurred inside a tank dike. Immediate action was taken to clean up the spill, resulting in a minimal loss.

Please call me if you need additional information.

Sincerely,

' Chris Hawley

Environmental Engineer

CH/jm

Enclosure

Cc: Richard Traylor Mike Macy Chad King

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July 11, 1986

Mr. Frank Chavez Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Mr. David Boyer Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87501

Gentlemen:

Attached is a subsequent notification of a minor spill of 10 barrels of light natural gasoline that occurred at Bloomfield Refining Company on July 5, 1986. Please call me if you need additional information.

Sincerely,

Chris Hawley

Environmental Engineer

CH/jm

Enclosure

Cc: Richard Traylor

Mike Macy Chad King MEM MENTOU OIL CONSERVATION COMMISSION

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

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April 9, 1986

Mr. Frank Chavez Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Dear Mr. Chavez

On April 9, 1986, Bloomfield Refining Company in Bloomfield, New Mexico had a spill occur in the crude unit area of our facility. Enclosed please find the completed notification report. It you need more information, please contact me.

Sincerely,

Chris Hawley

Environmental Engineer

app Howey

CH/jm

Enclosure

Cc: Richard Traylor

Mike Macy Chad King

David Boyer, Oil Conservation Division, Santa Fe-

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

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KOWLEDGE	AND BELIE	.г							
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IGNED	COM F	nwy			TI F	2119111		47 37 00 NATE	
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**ATTACH ADDITIONAL SHEETS IF NECESSARY

CIFY

STATE OF THE REAL PROPERTY.						ADDOCCC					
NAME OF	Bloomfie	eld Refinin	g Compai	ny	- 1'	ADDPESS P. O. Bo	x 159	, Blo	omfiel	d, New Me	xico 87413
DIRT	FIRE	BREAK	SPILL	LEA	K1-	BLOWOU	Γ	TOTH	ER*		
OF .	, , , , ,				X						1
TYPE OF	DRLG	PROD 1	F.NK	PIFE		GASO	OIL		OTHER*		
FACILITY	NEFF	WELL IE	BTTY	LINE]:	NT.	RFY	X			····
VAME OF	Rloomfie	ld Refinin	a Compar	227							
FACILITY LOCATION OF				<u> </u>			SiC.	,	TIJO	TOCE	ICOUNTY
TER SECTION							SEC.	27	TWP. T29N	RGE. R11W	San Juan
DISTANCE AL							L	1			·
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DE OCCURENC		p.m. on Ma	<u> </u>			OF DISC	OVERY	<u>l:</u>	35 p.m.	on May 1	9, 1985
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NOTICE GIVE	-N:	X	QUIR	ED		TO WHOM					
₹HOM		_				DATE AND HOU	D				
YPE OF			·	—— —		QUANTIT			<u>-</u>	VOLUME RI	
LUID LOST	Diesel I	Tuel				OF LOSS	. 80) bbl	s	COVERED	60 bbls
DID ANY FLI			NO		NTIT						
WATERCOU			X								
F YES, DE	SCRIBE FUI	LLY**									
		ROBLEM AND									
The bottom	n of Tank	No. 19 (di	lesel sa	les) d	level	oped a l	eak (a	appro	ximate	ly 80 gal:	lons per
minute).	This was	probably	lue to 1	ong-te	erm c	orrosion	to bo	otton	or tar	nk. Produ	ict make into
the tank	was immed	iately take	en out.	Diese	er sa	les were	tempo	orarı	.iy shu (See	attache	d sheet)
ESCRIBE A	REA AFFEC	TED AND CLE	ANUP AC	TION T	TAKEN	**					
		inside the							-		
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F AREA	1 17	ARMING	GRAZ	TNG		URBAN		OTHE		nk dike.	
URFACE	S	ANDY S	SANDY	CLA	Y	ROCKY		WET		אחע	SNOW
ONDITIONS	"	37 1	.OAM		••	The state of the s],	JRT X	3.13-1
ESCRIPE GI	NERAL CO	NDITIONS PR	REVAILIN	G (TEN	IPERA	TURE, PR	ECIPI	TATIO	N, ETC	.)**	
Temperatu	re was ap	proximatel	y 75°F w	with 1:	ight	winds fr	om no	rthwe	est. T	he sky wa	s cloudy
with some											
HERERY CI	RTIFY TH	AT THE INFO	NAT I ÓN	AROVE	- 70	TDIIE AND	СОМРІ	ETE	TO THE	PEST OF	MV
NOWLEDGE /)	ADOVE	_ 13	INUL AND	COMPL		TO THE	DEST OF	
•]
	Alli	nd, 1/.									
IGNED	[[UN 1440	4		TIT	LE Opera	tions	Sup	erinten	demtte M	lay 20, 1985
IFY	=	**ATTACH	/ADDITIO	NAL SE	HEFTS	IF NECE	SSARY				

pumped into the tank so water would leak instead of hydrocarbon. A small pit was dug to contain leak and a vacuum truck used to pump pit out. These actions were done within one hour of discovery of the leak.

Piping modifications were done to allow contents of this tank to be pumped to another tank. Diesel sales were started. Water level will be maintained until tank is empty and vacuum truck will continue to recover water from pit. These actions are on-going.

PLATEAU, INC.

P.O. BOX 26251 ALBUQUERQUE, N.M. 87125-6251 PHONE 505/262-2221

March 29, 1984

Mr. Joe Ramey, Director Oil Conservation Division P.O. Box 2088 State Land Office Building Santa Fe, New Mexico 87501

Dear Mr. Ramey:

On March 27, 1984, the Plateau refinery in Bloomfield, New Mexico, had a spill occur in the tank farm. The spill amounted to 400 barrels. We were able to recover all but 20 barrels. Immediate action was taken to clean up the spill; a subsequent telephone notification was given within 24 hours to yourself. Enclosed please find the completed report for notification of fire, leaks, breaks, spills and blowouts. If you have further questions, feel free to contact me.

Sincerely,

Dwight J. Stockham

Associate Environmental Engineer

RECEIVED

DJS/mm

MAR 0 0 1901

P.W. LISCOM

cc: P. W. Liscom

G. A. Masson

Ernie Busch - Oil Conservation Division

1000 Rio Brazos Boulevard Aztec, New Mexico 87410



NAME OF DIAMA	T .			ADDRESS				
UPERATUR	u, Inc.		ا ـــــ				ld, № 8	7413
REPORT FIRE	BREAK	SPILL XXXX	LEAK	BLOWOU	1 101	HER*		
TYPE OF DRLG	PROD	TTANK P	PE	GÁSO	OIL VVV	OTHER*		
FACILITY WELL	WELL	BTTY L	INE	PLNT	RFY XXX	<u> </u>		
NAME OF	field Refine	2 7 77			•			
LOCATION OF FACT					SEC.	TWP.	RGE.	COUNTY
ITER SECTION OR I					320.		1102.	
DISTANCE AND DIE					·	<u></u>		
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BY		TOTALD		DATE				
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DID ANY FLUIDS F	REACH YES	NO xxxx	QUANTIT	Υ	. *.			
A WATERCOURSE? IF YES, DESCRIBE	FIII I V**		l		<u>·</u>			
			·					·
DESCRIBE CAUSE (
The cause of	the problem	was due to	operato	or error.	The op	erator	will nay	
closer attent	tion to his o	duties to re	emedy ti	nis situa	ition.			
					•			
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The area affe was used to p	cted was in ick up the s	side a tank spill	dike or	n refiner	v proper	tv. A	vacuum t	ruck.
DESCRIPTION	FARMING	GRAZIN	G	URBAN	СТН	ER*	<u> </u>	
OF AREA	CAUDY	T CAUDY	Ici ev	Tacció			inery pro	
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DESCRIBE GENERAL	CONDITIONS		TEMPERA	TURF PR		1	<u></u>	1
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clear skies,	temperature	e 25°F						
							•	
I HEREBY CERTIFY		FORMATION A	BOVE IS	TRUE AND	COMPLETE	TO THE	BEST OF	MY
MNOWLEDGE AND BE	LIEF	$\Lambda\Lambda$						
_	111 0/	////						
SIGNED Dung	WI Ho	the	TIT	LE Assoc	Environ	Engin	DATE 3	/28/84
*SPECIFY //	// **ATTAC	H ADDITIONA	L SHEETS	IF HECE	SSARY			



November 14, 1984

Mr. Frank Chavez Oil Conservation Division State of New Mexico 1000 Rio Brazos Aztec, New Mexico 87410

Dear Frank:

This letter is notification that a hydrocarbon spill occurred at this refinery on November 7, 1984 at approximately 12:15 p.m. As I mentioned in our conversation on November 8th, the spilled product was naphtha out of a storage tank. A total of 880 bbls. of product spilled and was contained in the tank dike. 800 bbls. of this product was recovered and returned to our system.

If you need more information, please contact me.

Sincerely,

Chad King

Operations Supervisor

CK/jm

cc: Paul Liscom

PLATEAU, INC.

P.O. BOX 26251 ALBUQUERQUE, NEW MEXICO 87125 PHONE 505/262-2221

May 17, 1982

Mr. Jeff Edmister 1000 Rio Brazos Boulevard Aztec, New Mexico 87410

Dear Jeff:

On May 14, 1982, the Plateau Refinery had a spill occur in the tank farm. The spill amounted to 20 barrels. We were able to recover all but 10 barrels that coated the gravel and was mixed with dirt during the cleanup operation. Immediate action was taken to clean up the spill, a subsequent telephone notification was given the same day to yourself. Enclosed please find the completed report for notification of fire, breaks, leaks and blowouts. If you have further questions, feel free to contact me.

Sincerely yours,

D. J. Stockham

Associate Environmental Engineer

Dught J. Stocklan

DJS/shm

Enclosure



												
NAME OF OPERATOR	Plate	au, Inc.				ADDRESS	P. 0	. Во	×			
REPORT	FIRE	BREAK	ISPILL		LEAK	IBLOWOU'	ī	TOTI	IER*			
OF			XXX									_
TYPE OF	DRLG	1	TANK		PE	GAS0	OIL		OTHER	*		
FACILITY	WELL	WELL	BTTY	LI	INE	PLNT	RFY :	XXX				
NAME OF FACILITY	Plate	au, Inc.										
LOCATION OF							SEC.		TWP.	RGE.		COUNTY San Juan
TER SECTION DISTANCE A							L			1		Tour odan
EST TOWN OF												
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SIGNED) wight	1. Stoc	klan		TIT	LE Assoc	En	viro	n. Eng	gr.DATE	Ma	y 17, 1982
*SPECIFY	0-7	**ATTACH	ADDITION	AL	SHEETS	IF NECES	SARY					

PLATEAU, INC.

P.O. BOX 26251

ALBUQUEROUE, NEW MEXICO 87125
PHONE 505/262-2221

March 3, 1982

Mr. Frank Chavez 1000 Rio Brazos Blvd. Aztec, New Mexico 87410

Dear Frank:

On February 24, 1982, the Plateau Refinery had a spill occur at the crude unloading rack. The spill amounted to approximately 20 barrels. We were able to recover all but 3 or 4 barrels that coated the gravel and was mixed with dirt in the cleanup operation. Immediate action was taken to cleanup the spill. Enclosed please find the completed report for notification of fire, breaks, leaks and blowouts.

If you have further questions, feel free to contact me.

Sincerely yours,

D. J. Stockham

Associate Environmental Engineer

Dught J. Stocklan

DJS:sac

Enclosure

cc: K. D. Sinks

										
NAME OF	Dist					ADDRESS		Box 159		
OPERATOR		eau, Inc.			Ti GAV					
	IRE	BREAK	SPILL		LEAK	BLOWOU		OTHER*		
OF TYPE OF DI	RLG	PROD I	XXX		IPE I	GASO -	1011	I OTHER	+	
1	ELL		TANK				OIL		•	
NAME OF		WELL	BTTY	<u>i </u>	INE	PLNT	RFY X	<u> </u>		
FACILITY	Plat	teau, Inc.								
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TER SECTION (3EC.			1 1
DISTANCE AND							<u> </u>	i		LSan_luan_
EST TOWN OR I				ne N	Mile Sou	ith of th	e City	of Bloo	mfield	
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NOTICE GIVEN		E3 NO				IF YES,				
BY	<u> </u>		Į Ų	IRED		TO WHOM				
∛HOM						DATE	,			
TYPE OF						AND HOU			TVOLUME DI	
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asemise dem			HETTLE	1110	(- C	TORE, THE	-01/11/	ATTON, EN	· · /	
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HEREBY CER KNOWLEDGE AND	TIFY TH	AT THE INF	ORMAT I	ON A	BOVE IS	TRUE AND	COMPL	ETE TO TH	E BEST OF I	ЧΥ
SIGNED Dun	ight	J. Stor	Ako	<i>1</i>)	TIT	LEAssoc	Envi	iron. Eng	gr.DATE 2	/25/82
SPECIFY	0 - 7	**ATTACH	ADDIT	IONA		IF NECE				

with the

February II, 1982

Mr. Frank Chavez 1000 Rio Brazos Blvd. Aztec, New Mexico 87410

Dear Frank:

On January 26, 1982, the Plateau Transportation Department had a line freeze, causing a sump to overflow. The overflow amounted to approximately 10 barrels spilling onto the ground. Immediate action was taken to cleanup the spill.

Enclosed please find the completed report for notification of fire, breaks, spills, leaks and blowouts. If you have any further questions, feel free to contact me.

Sincerely yours,

D. J. Stockham

Associate Environmental Engineer

Durght J. Stocklan

DJS:sac

Enclosure



NAME OF					ADDRESS				
OPERATOR	Platea	u Inc.			I	P.O. B	ox 159	•	
REPORT	FIRE	BREAK	SPILL	LEAK	BLOWOUT	. 0	THER*		
OF		<u> </u>						Overflow	<u>, </u>
TYPE OF	DRLG	PROD	TANK	PIPE		OIL	OTHER'	*	
FACILITY	WELL	WELL	BTTY	LINE	PLNT	RFYXXX			·
NAME OF		_							
FACILITY	<u>Plateau</u>	Transpo	rtation	L		CEC	17116	1005	10000070
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1						to ove	rflow.	- <u>-</u>	
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NEW ! NICO OIL CONSERVATION COM: "SSION

NAME OF	WORKSON'S AND			****		ADDRLSS				
RATOR	Plate	eau Refin	ery				, Bloom	field,	NM 8741	3
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TYPE OF FACILITY	DRLG WELL	ł I	NNK STTY			GÁSÓ PLNT	OIL RFY X	OTHER*		
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FACILITY	Plate	eau Refin	ery							
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by hydro	carbon	spills oc	currin	a .	in the	refiner	rv area	over th	e past 1	25 years.
This has	s caused	the grou	nd to	be	satura	ated wit	th the h	ydrocar	bon and	during
periods	of decl	ining wat	er tab	le	(such	as wher	n the wa	ter flo	w in the	e Hammond
DESCRIBE A	REA AFFEC	TED AND CLE	ANUP AC	TIO	N TAKEN	** }		1000	C - 1 - 5	
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DESCRIPTION	N F	ARMING	GRAZ	TNC		URBAN	Тотн	D*		
OF AREA	117	ARTING	JORAZ	1110	,	UNDAN			inery	
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NEW MEXICO OIL CONSERVATION COMMISSION NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS AND BLOWOUTS Page 2

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN (continued)

Ditch is cut off during winter), this hydrocarbon seeps to the lowest point, being the Hammond Ditch.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN (continued)

vertically at two places in the ditch. These will attract water and any hydrocarbon and will be pumped on a continual basis. Also, accidental hydrocarbon spills in the refinery area have been virtually eliminated.

Plateau is engineering a well to be placed in the area of the past spills. This will recover the oil in the spill area and should reduce the likelihood of the diesel migrating toward the Hammond irrigation ditch.

APPENDIX B TECHNOLOGY SCREENING MATRIX

BRC/task1.rep



TECHNOLOGY SCREENING MATRIX SOIL REMEDIATION

TECHNOLOGY CONSIDERED		APPLICABILITY to SITE	SITE		REATIV	RELATIVE COSTS	TREATMENT TIME ACCEPTABILITY	PATING SUMMATION	RETAIN YES/NO
	Advantage	Disadvantage	Relative Applicability Technical Permit 0.5 0.3	pplicability Permits 0 - 3	Capital	Operating O	Not Acceptable Acceptable		
-			٧	٩	High\$ 1 2	High\$ 1 2 3 4 5 Low\$	123	A*P*(C+O+T)	
Risk Assessment		CNT, C1	S	3	4	5	8	180	YES
in situ vapor extraction/	DEST, PERE,i, MRED	ADTRT	S	8	3	4	2	06	YES
in situ Bio	DEST	ADTRT, SMAT	3	2	3	3	1	35	Q
in situ Soil Washing	VRED	iA, AREA	2	7	4	2	-	58	Q.
Chemical Fracture	MRED	iA, AREA	2	က	2	4	2	ß	Q.
Vitrification	MRED	ET	-	က	5	4	2	4	Q
Steam Stripping	VRED	ЫĀ	2	3	5	2	3	99	ON.

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TECHNOLOGY SCREENING MATRIX LNAPL PHASE RECOVERY

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	Advantage	Disadvantage	Relative Applicability Technical Perm 0 - 5 0 .	plicability Permits 0 - 3	Capital C High\$ 1.2	Capital Operating C 0 High\$ 1 2 3 4 5 Low\$	Not Acceptable Acceptable T	A*P*(C+O+T)	
Skimming Pumps	VRED, PERF,i	AREA	3	3	3	2	Į	81	YES
DVEL Pump System	MRED, PERF, i	AREA, ADTRT	4	-	2	3	1	24	ON
Vapor Extraction	DEST, PERF, i	ADTRT	5	2	4	4	2	100	YES
Hi VAC Total Fluid Ext.	DEST, MRED	ET, ADTRT	4	2	2	3	8	64	YES
Total Fluid Pumping	MRED, VRED, i	ADTRT, AREA	4	-	8	3	•	24	2
Sparging/Vapor Extraction	DEST, i	Ķ	7	~	က	ო	2	32	9

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TECHNOLOGY SCREENING MATRIX MITIGATE SEEPAGE

TECHNOLOGY CONSIDERED		APPLICABILITY TO SITE	STE		PELATIV	PELATIVE COSTS	TREATMENT TIME ACCEPTABILITY	RATING SUMMATION	PETAIN YES/NO
	Advantage	Disadvantage	Relative Applicability Technical Permit 0 - 5 0 - 3	opilicability Permits 0 - 3	Capital	Operating O	Not Acceptable Acceptable T		Φροροποιοιοιοίο
			Υ	Р	High\$ 1.2	High\$ 12345 Low\$	123	A*P*(C+O+T)	
Dewater entire site	VRED	ADTRT	-	-	1	-	1	3	ON.
Grout Curtain	MRED, I, PERF	CNT, DTW	5	3	3	S	3	88	YES
Air Curtain	MRED	ET, CNT	-	3	4	4	2	30	ON
Intercept Trench	MRED, i, PERF	CNT, ADTRT, DTW	5	-	3	3	3	45	YES
Reverse Gradient	MRED, i	ADTRT	3	-	2	2	2	24	ON
Water Curtain	MRED	ADTRT	3		က	3	2	24	Q Q
Dewater Near Seeps	MRED, VRED	ADTRT	ıo	-	4	4	ო	22	YES

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TECHNOLOGY SCREENING MATRIX REDUCE DISSOLVED CONCENTRATIONS

TECHNOLOGY CONSIDERED		APPLICABILITY to SITE	SIE		RELATIN	RELATIVE COSTS	TREATMENT TIME ACCEPTABILITY	RATING SUMMATION	RETAIN YES/NO
	Advantage	Disadvantage	Relative Applicability Technical Permit 0.5 0.3	pficability Permits 0 - 3	Capital	Operating O	Not Acceptable Acceptable T		
			٧	Р	High\$ 1.2	High\$ 12345 Low\$	123	A*P*(C+O+T)	
Risk Assessment		CNT, CI	5	8	4	5	3	180	YES
Pump, Treat, Reject	MRED, VRED	AREA, ADTRT	က	2	3	4	2	ଞ	YES
Pump, Treat, Infiltrate	MRED, VRED, i	AREA, ADTRT	3	2	4	3		24	Q 2
Sparging/Vapor Extraction	MRED, DEST, I, PERF	ET, ADTRT	4	2	က	ო	a	25	YES
in situ Bio	DEST	AREA	2	1	3	3	-	14	ON ON
Source reduction	•	CNT	4	3	2	4	1	120	YES

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LEGEND

mred - Mobility Reduction

dest - Destruction very implementable vred - Valume Reduction

et - Emerging Technology smat = inappropriate soil material

ia - Inappropriate Technology

nperm - Not Permittable

dtw = depth to water

na = not available

0 1 > \$500K/CY 1 > 3 years improbable

TECHNICAL

COST LEGEND

TIME LEGEND

2 > 1-3 years 2 \$200-500K/CY

3 < 1 year

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