GW - 032

712 Waste

YEAR(S):

2009 - Present

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, July 20, 2010 6:21 AM
To: 'Larsen, Thurman'
Cc: Dorsey, Alvin; Polly J. Wagner
Subject: RE: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Beck:

It appears the benzene packing material waste has exceeded [DRO] of 1000 mg/kg. Consequently, this waste cannot be approved for a Solid Waste Landfill, unless the Rio Rancho Landfill indicates that it can handle special wastes with elevated [DRO] and agrees to accept it. Based on process knowledge and the updated analytical data for TPH and NORM, everything looks good except the extremely elevated TPH levels.

Thank you.

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

From: Larsen, Thurman [mailto:Thurman.Larsen@wnr.com]
Sent: Monday, July 19, 2010 10:12 AM
To: Chavez, Carl J, EMNRD
Cc: Dorsey, Alvin; Polly J. Wagner
Subject: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Dear Carl,
Here is the Benzene Packing Analysis from the May 24th sampling that we spoke earlier. It took MUCH longer that I had expected even with a RUSH analysis. Please consider this for a RUSH approval if possible. As I had mentioned in an earlier conversation, we send this material off site for disposal at least 3 to 5 times per year. Thanks for the consideration.
Regards,

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Friday, May 21, 2010 10:27 AM
To: Larsen, Thurman
Subject: RE: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Ok. Thanks.

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

From: Larsen, Thurman [mailto:Thurman.Larsen@wnr.com]
Sent: Friday, May 21, 2010 10:08 AM
To: Chavez, Carl J, EMNRD
Cc: Dorsey, Alvin
Subject: RE: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Thanks Carl. I sent an e-mail to Alvin Dorsey to get him to sample the benzene packing material on Monday, May 24 on a RUSH analysis. I will send this analysis to you as soon as we get the results back.
Thanks for your assistance.

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Friday, May 21, 2010 9:50 AM
To: Larsen, Thurman
Subject: FW: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Beck:

Good morning.

Based on our telephone call this morning, Western will resample for TPH and NORM and submit new analytical data to OCD for consideration of approval.

Thank you.

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

From: Chavez, Carl J, EMNRD
Sent: Thursday, May 20, 2010 4:55 PM
To: 'Larsen, Thurman'
Subject: RE: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Beck:

It appears that the TPH parameters exceeded from the analytical data results provided. OCD recommends the following: Western may resample for TPH and provide analytical data that meets the limits in D(3) below for OCD approval or Western could ship waste to an OCD permitted disposal facility in New Mexico.

Please let me know what Western wants to do. Thank you.

Per 19.15.35.8(C)3k NMAC, a person may dispose of the following wastes on a case-by-case basis with the Division's approval: tower packing material. The 19.15.35.8(D) Testing Provisions must be met (see below).

D. Testing.
19.15.35 NMAC
http://www.nmcpr.state.nm.us/nmac/parts/title19/19.015.0035.htm[1/16/2009 4:33:09 PM]
(1) The person applying for division approval to dispose of waste in a solid waste facility shall conduct testing required by 19.15.35.8 NMAC according to the Test Methods for Evaluating Solid Waste, EPA No. SW-846 and shall direct questions concerning the standards or a particular testing facility to the division.
(2) The testing facility shall conduct testing according to the test method listed:
(a) TPH: EPA method 418.1 or 8015 (DRO and GRO only) or an alternative, division-approved hydrocarbon analysis;

(b) TCLP: EPA Method 1311 or an alternative hazardous constituent analysis approved by the division;
(c) paint filter test: EPA Method 9095A;
(d) ignitability test: EPA Method 1030;
(e) corrosivity: EPA Method 1110;
(f) reactivity: test procedures and standards the division establishes on a case-by-case basis; and
(g) NORM. 20.3.14 NMAC.
(3) To be eligible for disposal pursuant to 19.15.35.8 NMAC, the concentration of substances the testing facility identifies during testing shall not exceed the following limits:
(a) benzene: 9.99 mg/kg;
(b) BTEX: 499.99 mg/kg (sum of all);
(c) TPH: 1000 mg/kg;
(d) hazardous air pollutants: the standards set forth in NESHAP; and
(e) TCLP:
(i) arsenic: 5 mg/l,
(ii) barium: 100 mg/l,
(iii) cadmium: 1 mg/l,
(iv) chromium: 5 mg/l,
(v) lead: 5 mg/l,
(vi) mercury: 0.2 mg/l,
(vii) selenium: 1 mg/l, and
(viii) silver: 5 mg/l.
[19.15.35.8 NMAC - Rp, 19.15.9.712 NMAC, 12/1/08]

Please be advised that OCD approval of this plan does not relieve Western Refining Southwest, Inc. of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Western Refining Southwest, Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

From: Larsen, Thurman [mailto:Thurman.Larsen@wnr.com]
Sent: Thursday, May 20, 2010 4:04 PM
To: Chavez, Carl J, EMNRD
Subject: FW: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Carl,
Here are the attachments to the previous e-mail on the benzene packing material. Let me know if you have any additional questions.
Thanks,

From: Larsen, Thurman
Sent: Wednesday, March 31, 2010 2:05 PM
To: Chavez, Carl J, EMNRD
Cc: Jones, Brad A., EMNRD; 'Polly J. Wagner'
Subject: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Dear Mr. Chavez,

Reference: OCD Permit GW-032; 19.1535.8 NMAC
Request: ANNUAL APPROVAL for Benzene Packing Material to Waste Management (Rio Rancho)

In accordance with NMAC Regulations 19.15.35.8, Western Refining (Southwest) is requesting an annual approval for the disposal of the facilities Benzene Stripper Packing Material to the Waste Management Facility in Rio Rancho, NM via Rinchem. The accumulation of benzene packing material is a direct result of periodic replacement through maintenance activities so as to maintain the required benzene stripping efficiencies in order to satisfy the New Mexico Environmental Department Hazardous Waste Bureau (HWB). The Benzene Stripper Columns that contain the packing material are an essential part of the facilities Wastewater System.

A record search from the Oil Conservation Division (OCD) database was diligently conducted in an attempt to locate any reference to the approval of the benzene packing material from previous Permit Applications and OCD/Western Refining (Giant) Correspondence. However, as a result of this search, no direct or definitive conclusion was able to be determined granting Western approval from OCD. Several earlier correspondence letters mentioned the approval for installation of the benzene stripper, its relationship to the Wastewater Treatment Process, including implications that this material has been approved; however, references from this correspondence identifying the approval could not be located.

The above attachments include Waste Management Profile and the required analysis for the Agency to make a "determination" on the Benzene Packing Material. All previous analysis of this material has indicated that this material is non-hazardous. Therefore, Western Refining is requesting an Annual Approval for disposal of benzene packing material to Waste Management in Rio Rancho, NM. A sense of urgency in this matter is greatly appreciated. If you should require additional information, please contact me at (505) 722-0258.

Sincerely,
Beck Larsen- CHMM/REM
Environmental Engineer
Western Refining (Southwest)- Gallup Refinery

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

HALL
ENVIRONMENTAL
ANALYSIS
LABORATORY

COVER LETTER

Sunday, July 18, 2010

Thurman B. Larsen
Western Refining Southwest, Gallup
Rt. 3 Box 7
Gallup, NM 87301

TEL: (505) 722-0258
FAX (505) 722-0210

RE: BZ Packing

Order No.: 1005702

Dear Thurman B. Larsen:

Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 5/25/2010 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites.

Reporting limits are determined by EPA methodology.

Please do not hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman, Laboratory Manager

NM Lab # NM9425 NM0901
AZ license # AZ0682
ORELAP Lab # NM100001
Texas Lab# T104704424-08-TX

4901 Hawkins NE ■ Suite D ■ Albuquerque, NM 87109
505.345.3975 ■ Fax 505.345.4107
www.hallenvironmental.com

Hall Environmental Analysis Laboratory, Inc. **Date:** *18-Jul-10*

CLIENT: Western Refining Southwest, Gallup
Project: BZ Packing
Lab Order: 1005702

CASE NARRATIVE

Analytical Comments for METHOD 8015DRO_S, SAMPLE 1005702-01A: DNOP not recovered due to dilution

Pace Analytical Services, Inc.
1638 Roseytown Road - Suites 2,3,4
Greensburg, PA 15601
(724)850-5600

ANALYTICAL RESULTS

Project: 1005702
Pace Project No.: 3028804

Sample: 1005702-01B/BZ packing Lab ID: **3028804001** Collected: 05/24/10 08:00 Received: 06/03/10 10:30 Matrix: Solid
PWS: Site ID: Sample Type:

Results reported on a "dry-weight" basis

Parameters	Method	Act ± Unc (MDC)	Units	Analyzed	CAS No.	Qual
Bismuth-212	EPA 901.1m	**1.52 ± 0.798 (0.251)**	pCi/g	07/14/10 18:02	14913-49-6	
Bismuth-214	EPA 901.1m	**14.5 ± 1.61 (0.0460)**	pCi/g	07/14/10 18:02	14733-03-0	
Lead-212	EPA 901.1m	**0.756 ± 0.119 (0.0400)**	pCi/g	07/14/10 18:02	15092-94-1	
Lead-214	EPA 901.1m	**15.1 ± 1.75 (0.0570)**	pCi/g	07/14/10 18:02	15067-28-4	
Potassium-40	EPA 901.1m	**0.556 ± 0.372 (0.206)**	pCi/g	07/14/10 18:02	13966-00-2	
Radium-226	EPA 901.1m	**18.5 ± 2.92 (0.636)**	pCi/g	07/14/10 18:02	13982-63-3	
Radium-228	EPA 901.1m	**1.59 ± 0.248 (0.0780)**	pCi/g	07/14/10 18:02	15262-20-1	
Thallium-208	EPA 901.1m	**0.412 ± 0.142 (0.0750)**	pCi/g	07/14/10 18:02	14913-50-9	
Thorium-234	EPA 901.1m	**1.43 ± 1.18 (0.672)**	pCi/g	07/14/10 18:02	15065-10-8	
Uranium-235	EPA 901.1m	**0.0150 ± 0.423 (0.246)**	pCi/g	07/14/10 18:02	15117-96-1	

Hall Environmental Analysis Laboratory, Inc.

Date: *18-Jul-10*

CLIENT:	Western Refining Southwest, Gallup	**Client Sample ID:**	BZ Packing
Lab Order:	1005702	**Collection Date:**	5/24/2010 8:00:00 AM
Project:	BZ Packing	**Date Received:**	5/25/2010
Lab ID:	1005702-01	**Matrix:**	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: **JB**
Diesel Range Organics (DRO)	57000	1000		mg/Kg	100	6/2/2010 11:56:22 AM
Motor Oil Range Organics (MRO)	23000	5000		mg/Kg	100	6/2/2010 11:56:22 AM
Surr: DNOP	0	61.7-135	S	%REC	100	6/2/2010 11:56:22 AM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: **NSB**
Gasoline Range Organics (GRO)	ND	1000		mg/Kg	200	6/2/2010 2:26:09 AM
Surr: BFB	95.3	65.9-118		%REC	200	6/2/2010 2:26:09 AM
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**
Benzene	ND	10		mg/Kg	200	6/2/2010 2:26:09 AM
Toluene	ND	10		mg/Kg	200	6/2/2010 2:26:09 AM
Ethylbenzene	ND	10		mg/Kg	200	6/2/2010 2:26:09 AM
Xylenes, Total	ND	20		mg/Kg	200	6/2/2010 2:26:09 AM
Surr: 4-Bromofluorobenzene	96.0	64.7-120		%REC	200	6/2/2010 2:26:09 AM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	MCL	Maximum Contaminant Level
NC	Non-Chlorinated	ND	Not Detected at the Reporting Limit
PQL	Practical Quantitation Limit	S	Spike recovery outside accepted recovery limits

Pace Analytical Services, Inc.
1638 Roseytown Road - Suites 2,3,4
Greensburg, PA 15601
(724)850-5600

QUALITY CONTROL DATA

Project: 1005702
Pace Project No.: 3028804

QC Batch: RADC/5364
QC Batch Method: EPA 901.1m
Analysis Method: EPA 901.1m
Analysis Description: 901.1 Gamma Spec
Associated Lab Samples: 3028804001

METHOD BLANK: 183355
Matrix: Solid
Associated Lab Samples: 3028804001

Parameter	Act ± Unc (MDC)	Units	Analyzed	Qualifiers
Bismuth-212	0.184 ± 0.202 (0.0950)	pCi/g	07/15/10 07:50	
Bismuth-214	0.0110 ± 0.0380 (0.0230)	pCi/g	07/15/10 07:50	
Lead-212	0.0420 ± 0.0350 (0.0150)	pCi/g	07/15/10 07:50	
Lead-214	0.0480 ± 0.0440 (0.0190)	pCi/g	07/15/10 07:50	
Potassium-40	-0.186 ± 7.43 (0.102)	pCi/g	07/15/10 07:50	
Radium-226	0.111 ± 0.420 (0.195)	pCi/g	07/15/10 07:50	
Radium-228	-0.041 ± 0.112 (0.0330)	pCi/g	07/15/10 07:50	
Thallium-208	0.0180 ± 0.0360 (0.0290)	pCi/g	07/15/10 07:50	
Thorium-234	0.621 ± 0.612 (0.259)	pCi/g	07/15/10 07:50	
Uranium-235	0.0370 ± 0.131 (0.0760)	pCi/g	07/15/10 07:50	

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: BZ Packing **Work Order:** 1005702

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8015B: Diesel Range Organics											
Sample ID: MB-22462		*MBLK*				Batch ID:	**22462**	Analysis Date:		6/2/2010 9:31:18 AM	
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Motor Oil Range Organics (MRO)	ND	mg/Kg	50								
Sample ID: LCS-22462		*LCS*				Batch ID:	**22462**	Analysis Date:		6/2/2010 10:07:15 AM	
Diesel Range Organics (DRO)	46.50	mg/Kg	10	50	0	93.0	64.6	116			
Sample ID: LCSD-22462		*LCSD*				Batch ID:	**22462**	Analysis Date:		6/2/2010 10:43:44 AM	
Diesel Range Organics (DRO)	45.31	mg/Kg	10	50	0	90.6	64.6	116	2.59	17.4	
Method: EPA Method 8015B: Gasoline Range											
Sample ID: MB-22447		*MBLK*				Batch ID:	**22447**	Analysis Date:		6/2/2010 5:28:01 AM	
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0								
Sample ID: LCS-22447		*LCS*				Batch ID:	**22447**	Analysis Date:		6/2/2010 4:27:14 AM	
Gasoline Range Organics (GRO)	27.27	mg/Kg	5.0	25	1.85	102	77.7	135			
Sample ID: LCSD-22447		*LCSD*				Batch ID:	**22447**	Analysis Date:		6/2/2010 4:57:41 AM	
Gasoline Range Organics (GRO)	25.58	mg/Kg	5.0	25	1.85	94.9	77.7	135	6.40	11.6	
Method: EPA Method 8021B: Volatiles											
Sample ID: MB-22447		*MBLK*				Batch ID:	**22447**	Analysis Date:		6/2/2010 5:28:01 AM	
Benzene	ND	mg/Kg	0.050								
Toluene	ND	mg/Kg	0.050								
Ethylbenzene	ND	mg/Kg	0.050								
Xylenes, Total	ND	mg/Kg	0.10								
Sample ID: LCS-22447		*LCS*				Batch ID:	**22447**	Analysis Date:		6/2/2010 11:16:17 AM	
Benzene	0.8503	mg/Kg	0.050	1	0	85.0	78.8	132			
Toluene	0.8126	mg/Kg	0.050	1	0	81.3	78.9	112			
Ethylbenzene	0.8686	mg/Kg	0.050	1	0	86.9	69.3	125			
Xylenes, Total	2.700	mg/Kg	0.10	3	0	90.0	73	128			
Sample ID: LCSD-22447		*LCSD*				Batch ID:	**22447**	Analysis Date:		6/2/2010 3:57:06 AM	
Benzene	0.9661	mg/Kg	0.050	1	0	96.6	78.8	132	12.8	27	
Toluene	0.9497	mg/Kg	0.050	1	0	95.0	78.9	112	15.6	19	
Ethylbenzene	1.029	mg/Kg	0.050	1	0	103	69.3	125	16.9	10	R
Xylenes, Total	3.154	mg/Kg	0.10	3	0	105	73	128	15.5	13	R

Qualifiers:

- E Estimated value
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- H Holding times for preparation or analysis exceeded
- NC Non-Chlorinated
- R RPD outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name WESTERN REFINING GALLU Date Received: 5/25/2010

Work Order Number 1005702 Received by: TLS

Checklist completed by: _____ 5/25/10 Sample ID labels checked by: AT
Signature Date Initials

Matrix: Carrier name FedEx

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐	
Custody seals intact on shipping container/cooler?	Yes ☑	No ☐	Not Present ☐	Not Shipped ☐
Custody seals intact on sample bottles?	Yes ☑	No ☐	N/A ☐	
Chain of custody present?	Yes ☑	No ☐		
Chain of custody signed when relinquished and received?	Yes ☑	No ☐		
Chain of custody agrees with sample labels?	Yes ☑	No ☐		
Samples in proper container/bottle?	Yes ☑	No ☐		
Sample containers intact?	Yes ☑	No ☐		
Sufficient sample volume for indicated test?	Yes ☑	No ☐		
All samples received within holding time?	Yes ☑	No ☐		Number of preserved bottles checked for pH:
Water - VOA vials have zero headspace?	No VOA vials submitted ☑	Yes ☐	No ☐	
Water - Preservation labels on bottle and cap match?	Yes ☐	No ☐	N/A ☑	
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑	*<2 >12 unless noted below.*
Container/Temp Blank temperature?	**2.4°**	*<6° C Acceptable* If given sufficient time to cool.		

COMMENTS:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: NORM Standard TAT is 20 DAY TAT Cannot be rushed TAT 5/25/10 Notified B

Corrective Action _____

Hall Environmental Analysis Laboratory, Inc.

REMIT TO: **Hall Environmental Analysis Lab, Inc.**
Accounts Receivable
4901 Hawkins NE, Suite D
Albuquerque, New Mexico 87109-4372
TEL: (505) 345-3975

INVOICE

INV DATE: *July 18, 2010*
Print DATE: *July 18, 2010*

Invoice No: 1005702

Invoice TO: Western Refining Southwest, Gallup Refinery
Rt 3 Box 7
Gallup, NM 87301

Attn: Thurman B. Larsen
Phone: (505) 722-3833

Work Order: 1005702 Order Name BZ Packing
PO Number: Roll Off Box 20B25 Date Received 5/25/2010

Item	Remarks	Matrix	Qty	Unit Price	Mult	Quoted	Test Total
EPA Method 8015B: Diesel Range Organic		Soil	1	$25.00	1	$25.00	$25.00
EPA Method 8015B: Gasoline Range		Soil	1	$25.00	1	$25.00	$25.00
EPA Method 8021B: Volatiles		Soil	1	$50.00	1	$50.00	$50.00
RADIUM 226 and 228 Subbed		Aqueous	1	$100.00	1	$100.00	$100.00

Subtotal:	**$200.00**
Discount:	0.00%
Sales Tax:	7.00%
Misc Charges:	$0.00
Payment Received:	$0.00
INVOICE Total:	**$214.00**

All invoices are due and payable net 30 days from receipt.

Chain-of-Custody Record

Client: WESTERN-Refining Gallup Refinery

Mailing Address: RT 3 Box 9 Gallup NM 87301

Phone #:

email or Fax#:

QA/QC Package:
☐ Standard ☐ Level 4 (Full Validation)

Accreditation
☐ NELAP ☐ Other

☐ EDD (Type)

Turn-Around Time:
☐ Standard ☒ Rush

Project Name: BZ Packing

Project #: Roll off Box 20B25

Project Manager: Thurman Larsen

Sampler: Alvin Dorsey

On Ice: ☒ Yes ☐ No

Sample Temperature: 3.4

HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 1005702	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F,Cl,NO_3,NO_2,PO_4,SO_4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	TPH	Chloride	BTEX	Air Bubbles (Y or N)
5-24-10	0800	Soil	BZ Packing	2 QT	None	-1												X	X	X	

Analysis Request

Date:	Time:	Relinquished by:	Received by:	Date	Time
5-24-10	1200	Alvin Dorsey		5/25/10	845
Date:	Time:	Relinquished by:	Received by:	Date	Time

Remarks: RUSH

Chavez, Carl J, EMNRD

From: Larsen, Thurman [Thurman.Larsen@wnr.com]
Sent: Thursday, May 20, 2010 4:04 PM
To: Chavez, Carl J, EMNRD
Subject: FW: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)
Attachments: img-310140103-0001.pdf; BNZ PACKING FINAL ANAL 021810.pdf; BNZ PACKING RECERT-ANALYSIS021710.pdf; BNZ STRIPPER PACKING Analysis.pdf

Carl,
Here are the attachments to the previous e-mail on the benzene packing material. Let me know if you have any additional questions.
Thanks,

From: Larsen, Thurman
Sent: Wednesday, March 31, 2010 2:05 PM
To: Chavez, Carl J, EMNRD
Cc: Jones, Brad A., EMNRD; 'Polly J. Wagner'
Subject: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Dear Mr. Chavez,

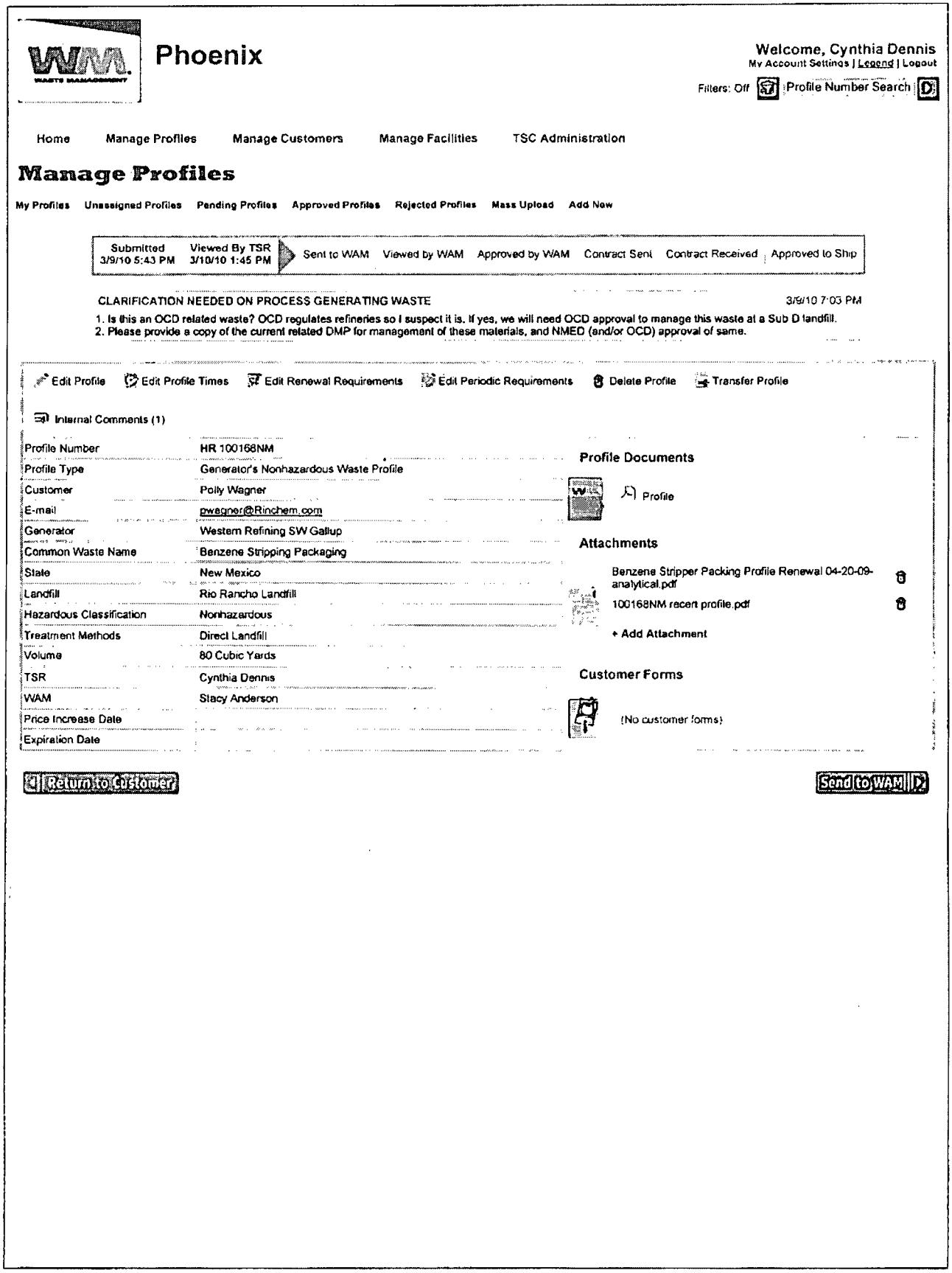
Reference: OCD Permit GW-032; 19.1535.8 NMAC
Request: ANNUAL APPROVAL for Benzene Packing Material to Waste Management (Rio Rancho)

In accordance with NMAC Regulations 19.15.35.8, Western Refining (Southwest) is requesting an annual approval for the disposal of the facilities Benzene Stripper Packing Material to the Waste Management Facility in Rio Rancho, NM via Rinchem. The accumulation of benzene packing material is a direct result of periodic replacement through maintenance activities so as to maintain the required benzene stripping efficiencies in order to satisfy the New Mexico Environmental Department Hazardous Waste Bureau (HWB). The Benzene Stripper Columns that contain the packing material are an essential part of the facilities Wastewater System.

A record search from the Oil Conservation Division (OCD) database was diligently conducted in an attempt to locate any reference to the approval of the benzene packing material from previous Permit Applications and OCD/Western Refining (Giant) Correspondence. However, as a result of this search, no direct or definitive conclusion was able to be determined granting Western approval from OCD. Several earlier correspondence letters mentioned the approval for installation of the benzene stripper, its relationship to the Wastewater Treatment Process, including implications that this material has been approved; however, references from this correspondence identifying the approval could not be located.

The above attachments include Waste Management Profile and the required analysis for the Agency to make a "determination" on the Benzene Packing Material. All previous analysis of this material has indicated that this material is non-hazardous. Therefore, Western Refining is requesting an Annual Approval for disposal of benzene packing material to Waste Management in Rio Rancho, NM. A sense of urgency in this matter is greatly appreciated. If you should require additional information, please contact me at (505) 722-0258.

Sincerely,
Beck Larsen- CHMM/REM
Environmental Engineer
Western Refining (Southwest)- Gallup Refinery



Phoenix

Welcome, Cynthia Dennis
My Account Settings | Legend | Logout
Filters: Off | Profile Number Search

Home | Manage Profiles | Manage Customers | Manage Facilities | TSC Administration

Manage Profiles

My Profiles | Unassigned Profiles | Pending Profiles | Approved Profiles | Rejected Profiles | Mass Upload | Add New

Submitted	Viewed By TSR	Sent to WAM	Viewed by WAM	Approved by WAM	Contract Sent	Contract Received	Approved to Ship
3/9/10 5:43 PM	3/10/10 1:45 PM						

CLARIFICATION NEEDED ON PROCESS GENERATING WASTE — 3/9/10 7:03 PM

1. Is this an OCD related waste? OCD regulates refineries so I suspect it is. If yes, we will need OCD approval to manage this waste at a Sub D landfill.
2. Please provide a copy of the current related DMP for management of these materials, and NMED (and/or OCD) approval of same.

Edit Profile | Edit Profile Times | Edit Renewal Requirements | Edit Periodic Requirements | Delete Profile | Transfer Profile

Internal Comments (1)

Profile Number	HR 100168NM
Profile Type	Generator's Nonhazardous Waste Profile
Customer	Polly Wagner
E-mail	pwagner@Rinchem.com
Generator	Western Refining SW Gallup
Common Waste Name	Benzene Stripping Packaging
State	New Mexico
Landfill	Rio Rancho Landfill
Hazardous Classification	Nonhazardous
Treatment Methods	Direct Landfill
Volume	80 Cubic Yards
TSR	Cynthia Dennis
WAM	Stacy Anderson
Price Increase Date	
Expiration Date	

Profile Documents

Profile

Attachments

Benzene Stripper Packing Profile Renewal 04-20-09-analytical.pdf

100168NM recert profile.pdf

+ Add Attachment

Customer Forms

(No customer forms)

Return to Customer | Send to WAM

HALL
ENVIRONMENTAL
ANALYSIS
LABORATORY

COVER LETTER

Friday, May 15, 2009

Thurman B. Larson
Western Refining Southwest, Gallup
Rt. 3 Box 7
Gallup, NM 87301

TEL: (505) 722-3833
FAX (505) 722-0210

RE: Benzene Stripper Packing Profile Renewal

Order No.: 0904333

Dear Thurman B. Larson:

Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 4/21/2009 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites.

Reporting limits are determined by EPA methodology. No determination of compounds below these (denoted by the ND or < sign) has been made.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman, Business Manager
Nancy McDuffie, Laboratory Manager

NM Lab # NM9425
AZ license # AZ0682
ORELAP Lab # NM100001
Texas Lab# T104704424-08-TX

Hall Environmental Analysis Laboratory, Inc.

Date: *15-May-09*

CLIENT:	Western Refining Southwest, Gallup	**Client Sample ID:**	BZ Stripper-Packing
Lab Order:	0904333	**Collection Date:**	4/20/2009 10:30:00 AM
Project:	Benzene Stripper Packing Profile Renewal	**Date Received:**	4/21/2009
Lab ID:	0904333-01	**Matrix:**	SOLID

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
MERCURY, TCLP						Analyst: **MMS**
Mercury	ND	0.020		mg/L	1	5/1/2009 4:33:46 PM
EPA METHOD 6010B: TCLP METALS						Analyst: **NMO**
Arsenic	ND	5.0		mg/L	1	5/5/2009 6:51:22 AM
Barium	ND	100		mg/L	1	5/5/2009 6:51:22 AM
Cadmium	ND	1.0		mg/L	1	5/5/2009 6:51:22 AM
Chromium	ND	5.0		mg/L	1	5/5/2009 6:51:22 AM
Lead	ND	5.0		mg/L	1	5/5/2009 6:51:22 AM
Selenium	ND	1.0		mg/L	1	5/5/2009 7:33:10 AM
Silver	ND	5.0		mg/L	1	5/5/2009 6:51:22 AM
VOLATILES BY 8260B/1311						Analyst: **NSB**
Benzene	ND	0.50		mg/L	1	5/1/2009 12:10:42 AM
2-Butanone	ND	10		mg/L	1	5/1/2009 12:10:42 AM
Carbon Tetrachloride	ND	0.50		mg/L	1	5/1/2009 12:10:42 AM
Chlorobenzene	ND	100		mg/L	1	5/1/2009 12:10:42 AM
Chloroform	ND	6.0		mg/L	1	5/1/2009 12:10:42 AM
1,4-Dichlorobenzene	ND	7.5		mg/L	1	5/1/2009 12:10:42 AM
1,2-Dichloroethane (EDC)	ND	0.50		mg/L	1	5/1/2009 12:10:42 AM
1,1-Dichloroethene	ND	0.70		mg/L	1	5/1/2009 12:10:42 AM
Hexachlorobutadiene	ND	0.50		mg/L	1	5/1/2009 12:10:42 AM
Tetrachloroethene (PCE)	ND	0.70		mg/L	1	5/1/2009 12:10:42 AM
Trichloroethene (TCE)	ND	0.50		mg/L	1	5/1/2009 12:10:42 AM
Vinyl chloride	ND	0.20		mg/L	1	5/1/2009 12:10:42 AM
Surr: 1,2-Dichloroethane-d4	101	69.9-130		%REC	1	5/1/2009 12:10:42 AM
Surr: 4-Bromofluorobenzene	104	71.2-123		%REC	1	5/1/2009 12:10:42 AM
Surr: Dibromofluoromethane	101	73.9-134		%REC	1	5/1/2009 12:10:42 AM
Surr: Toluene-d8	106	81.9-122		%REC	1	5/1/2009 12:10:42 AM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	MCL	Maximum Contaminant Level
ND	Not Detected at the Reporting Limit	RL	Reporting Limit
S	Spike recovery outside accepted recovery limits		

ENERGY LABORATORIES, INC. * 1120 S 27th St * PO Box 30916 * Billings, MT 59107-0916
Toll Free 800.735.4489 * 406.252.6325 * FAX 406.252.6069 * eli@energylab.com

LABORATORY ANALYTICAL REPORT

Client:	Hall Environmental	**Report Date:**	05/15/09
Project:	0904333	**Collection Date:**	04/20/09 10:30
Lab ID:	B09042167-001	**DateReceived:**	04/23/09
Client Sample ID:	0904333-01B, BZ Stripper-Packing	**Matrix:**	Solid

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
IGNITABILITY							
Flash Point (Ignitability)	>200	°F		80.0		SW1010M	04/27/09 18:30 / clr
CORROSIVITY							
pH of Soil and Waste	8.30	s.u.		0.10		SW9045D	04/29/09 15:45 / clr
REACTIVITY							
Cyanide, Reactive	ND	mg/kg		0.05	250	SW846 Ch 7	05/05/09 11:01 / kjp
Sulfide, Reactive	ND	mg/kg		20	500	SW846 Ch 7	05/04/09 08:00 / pwc

Report Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.
MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.

ENERGY LABORATORIES, INC. • P.O. Box 30916 • 1120 South 27th Street • Billings, MT 59107-0916
800-735-4489 • 406-252-6325 • 406-252-6069 fax • el@energylab.com

QA/QC Summary Report

Client: Hall Environmental
Project: 0904333

Report Date: 05/06/09
Work Order: B09042167

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: SW846 Ch 7									Batch: 38664
Sample ID: MB-38664	Method Blank				Run: AUTOAN201-B_090505A				05/05/09 11:17
Cyanide, Reactive	ND	mg/kg	0.05						
Method: SW846 Ch 7									Batch: R128836
Sample ID: MB-R128836	Method Blank				Run: MISC-HZW_090504A				05/04/09 08:00
Sulfide, Reactive	ND	mg/kg	10						
Sample ID: LCS-R128836	Laboratory Control Sample				Run: MISC-HZW_090504A				05/04/09 08:00
Sulfide, Reactive	36	mg/kg	20	124	50	150			
Method: SW9045D									Batch: R128621
Sample ID: B09041134-001ADUP	Sample Duplicate				Run: MISC-HZW_090429A				04/29/09 15:45
pH of Soil and Waste	6.05	s.u.	0.10				0.3	10	

Qualifiers:

RL - Analyte reporting limit.

ND - Not detected at the reporting limit.

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Benzene Stripper Packing Profile Renewal **Work Order:** 0904333

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 6010B: TCLP Metals									
Sample ID: MB-18989 FI		*MBLK*			Batch ID:	**18989**	Analysis Date:	5/5/2009 6:37:25 AM	
Arsenic	ND	mg/L	5.0						
Barium	ND	mg/L	100						
Cadmium	ND	mg/L	1.0						
Chromium	ND	mg/L	5.0						
Lead	ND	mg/L	5.0						
Silver	ND	mg/L	5.0						
Sample ID: MB-18989 F2		*MBLK*			Batch ID:	**18989**	Analysis Date:	5/5/2009 6:39:10 AM	
Arsenic	ND	mg/L	5.0						
Barium	ND	mg/L	100						
Cadmium	ND	mg/L	1.0						
Chromium	ND	mg/L	5.0						
Lead	ND	mg/L	5.0						
Silver	ND	mg/L	5.0						
Sample ID: MB-18989 FI		*MBLK*			Batch ID:	**18989**	Analysis Date:	5/5/2009 7:20:06 AM	
Selenium	ND	mg/L	1.0						
Sample ID: MB-18989 F2		*MBLK*			Batch ID:	**18989**	Analysis Date:	5/5/2009 7:22:01 AM	
Selenium	ND	mg/L	1.0						
Sample ID: LCS-18989		*LCS*			Batch ID:	**18989**	Analysis Date:	5/5/2009 6:40:55 AM	
Arsenic	0.5988	mg/L	0.050	115	80	120			
Barium	0.5162	mg/L	0.050	103	80	120			
Cadmium	0.5619	mg/L	0.050	112	80	120			
Chromium	0.5231	mg/L	0.050	105	80	120			
Lead	0.5306	mg/L	0.050	106	80	120			
Silver	0.5479	mg/L	0.050	109	80	120			
Sample ID: LCS-18989		*LCS*			Batch ID:	**18989**	Analysis Date:	5/5/2009 7:23:51 AM	
Selenium	0.5929	mg/L	0.050	119	80	120			

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
R	RPD outside accepted recovery limits	S	Spike recovery outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Benzene Stripper Packing Profile Renewal **Work Order:** 0904333

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: Volatiles by 8260B/1311									
Sample ID: mb-18919		*MBLK*			Batch ID:	**18919**	Analysis Date:	4/30/2009 11:38:28 PM	
Benzene	ND	mg/L	0.50						
2-Butanone	ND	mg/L	10						
Carbon Tetrachloride	ND	mg/L	0.50						
Chlorobenzene	ND	mg/L	100						
Chloroform	ND	mg/L	6.0						
1,4-Dichlorobenzene	ND	mg/L	7.5						
1,2-Dichloroethane (EDC)	ND	mg/L	0.50						
1,1-Dichloroethene	ND	mg/L	0.70						
Hexachlorobutadiene	ND	mg/L	0.50						
Tetrachloroethene (PCE)	ND	mg/L	0.70						
Trichloroethene (TCE)	ND	mg/L	0.50						
Vinyl chloride	ND	mg/L	0.20						
Sample ID: lcs-18919		*LCS*			Batch ID:	**18919**	Analysis Date:	4/30/2009 11:06:18 PM	
Benzene	0.5415	mg/L	0.50	135	51.1	171			
Chlorobenzene	ND	mg/L	100	133	36.1	191			
1,1-Dichloroethene	ND	mg/L	0.70	139	49.1	162			
Trichloroethene (TCE)	0.5050	mg/L	0.50	126	41.2	166			
Method: MERCURY, TCLP									
Sample ID: 0904333-01AMSD		*MSD*			Batch ID:	**18996**	Analysis Date:	5/1/2009 4:36:57 PM	
Mercury	0.005001	mg/L	0.0020	98.2	75	125	2.50	20	
Sample ID: MB-18996		*MBLK*			Batch ID:	**18996**	Analysis Date:	5/1/2009 4:29:03 PM	
Mercury	ND	mg/L	0.020						
Sample ID: LCS-18996		*LCS*			Batch ID:	**18996**	Analysis Date:	5/1/2009 4:30:37 PM	
Mercury	0.004815	mg/L	0.0020	95.0	80	120			
Sample ID: 0904333-01AMS		*MS*			Batch ID:	**18996**	Analysis Date:	5/1/2009 4:35:21 PM	
Mercury	0.004877	mg/L	0.0020	95.8	75	125			

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
R	RPD outside accepted recovery limits	S	Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name WESTERN REFINING GALLU Date Received: 4/21/2009

Work Order Number 0904333 Received by: AT

Checklist completed by: _____ 4/21/09 Sample ID labels checked by: _____

Signature Date Initials

Matrix: Carrier name: Client drop-off

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐	
Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Present ☐	Not Shipped ☑
Custody seals intact on sample bottles?	Yes ☐	No ☐	N/A ☑	
Chain of custody present?	Yes ☑	No ☐		
Chain of custody signed when relinquished and received?	Yes ☑	No ☐		
Chain of custody agrees with sample labels?	Yes ☑	No ☐		
Samples in proper container/bottle?	Yes ☑	No ☐		
Sample containers intact?	Yes ☑	No ☐		
Sufficient sample volume for indicated test?	Yes ☑	No ☐		
All samples received within holding time?	Yes ☑	No ☐		
Water - VOA vials have zero headspace?	No VOA vials submitted ☑	Yes ☐	No ☐	
Water - Preservation labels on bottle and cap match?	Yes ☐	No ☐	N/A ☑	
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑	
Container/Temp Blank temperature?	2°	*<6° C Acceptable* If given sufficient time to cool.		

COMMENTS:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: _____

Corrective Action _____

Chain-of-Custody Record

Client: WESTERN-REFINING Gallup Refinery

Mailing Address: RT 3 Box 9 Gallup NM 87301

Phone #: 505 722 3833

email or Fax#: 505 722 0210

QA/QC Package:
☐ Standard ☐ Level 4 (Full Validation)
☐ Other _____
☐ EDD (Type) _____

Turn-Around Time:
☐ Standard ☐ Rush _____

Project Name: BENZENE STRIPPER PACKING PROFILE RENEWAL

Project #: BZ PACKING Roll-OFF Box - Bundle Pad

Project Manager: THURMAN LARSEN

Sampler: ALVIN DORSEY

On Ice: ☒ Yes ☐ No

Sample Temperature: 2

HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 0904333	Analysis Request: BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F,Cl,NO_3,NO_2,PO_4,SO_4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	TCLP METALS	TCLP VOAS	RCI		Air Bubbles (Y or N)
04-20-09	1030	Solid	BZ STRIPPER-PACKING	2 QT		1												X	X	X		

Date: 04-21-09 Time: Relinquished by: [signature] Received by: [signature] Date: 4/21/09 Time: 16:18

Date: Time: Relinquished by: Received by: Date: Time:

Remarks:

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

HALL
ENVIRONMENTAL
ANALYSIS
LABORATORY

COVER LETTER

Tuesday, March 23, 2010

Thurman B. Larsen
Western Refining Southwest, Gallup
Rt. 3 Box 7
Gallup, NM 87301

TEL: (505) 722-0258
FAX (505) 722-0210

RE: Rolloff Box 20 B25

Order No.: 1002390

Dear Thurman B. Larsen:

Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 2/19/2010 for the analyses presented in the following report.

This report is an addendum to the report dated March 2, 2010. This is an updated report.

No determination of compounds below these (denoted by the ND or < sign) has been made.

Reporting limits are determined by EPA methodology.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman, Laboratory Manager

NM Lab # NM9425
AZ license # AZ0682
ORELAP Lab # NM100001
Texas Lab# T104704424-08-TX

Hall Environmental Analysis Laboratory, Inc.

Date: *23-Mar-10*

CLIENT:	Western Refining Southwest, Gallup	**Client Sample ID:**	BZ Packing
Lab Order:	1002390	**Collection Date:**	2/17/2010 1:00:00 PM
Project:	Rolloff Box 20 B25	**Date Received:**	2/19/2010
Lab ID:	1002390-01	**Matrix:**	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						Analyst: **JB**
Diesel Range Organics (DRO)	140000	2000	H	mg/Kg	200	3/19/2010 9:41:15 AM
Motor Oil Range Organics (MRO)	33000	10000	H	mg/Kg	200	3/19/2010 9:41:15 AM
Surr: DNOP	0	61.7-135	SH	%REC	200	3/19/2010 9:41:15 AM
EPA METHOD 8015B: GASOLINE RANGE						Analyst: **NSB**
Gasoline Range Organics (GRO)	ND	1000	H	mg/Kg	100	3/22/2010 5:56:18 PM
Surr: BFB	94.2	65.9-118	H	%REC	100	3/22/2010 5:56:18 PM
MERCURY, TCLP						Analyst: **RAGS**
Mercury	ND	0.020		mg/L	1	3/1/2010 3:33:21 PM
EPA METHOD 6010B: TCLP METALS						Analyst: **RAGS**
Arsenic	ND	5.0		mg/L	1	2/26/2010 2:22:39 PM
Barium	ND	100		mg/L	1	2/26/2010 2:22:39 PM
Cadmium	ND	1.0		mg/L	1	2/26/2010 2:22:39 PM
Chromium	ND	5.0		mg/L	1	2/26/2010 2:22:39 PM
Lead	ND	5.0		mg/L	1	2/26/2010 2:22:39 PM
Selenium	ND	1.0		mg/L	1	2/26/2010 2:22:39 PM
Silver	ND	5.0		mg/L	1	2/26/2010 2:22:39 PM
EPA METHOD 8260B: VOLATILES						Analyst: **DAM**
Benzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Toluene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Ethylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Methyl tert-butyl ether (MTBE)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2,4-Trimethylbenzene	4.7	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,3,5-Trimethylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dichloroethane (EDC)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dibromoethane (EDB)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Naphthalene	25	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1-Methylnaphthalene	220	10		mg/Kg	50	2/22/2010 11:49:32 AM
2-Methylnaphthalene	260	20		mg/Kg	100	2/22/2010 3:36:13 PM
Acetone	ND	38		mg/Kg	50	2/22/2010 11:49:32 AM
Bromobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Bromodichloromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Bromoform	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Bromomethane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
2-Butanone	ND	25		mg/Kg	50	2/22/2010 11:49:32 AM
Carbon disulfide	ND	25		mg/Kg	50	2/22/2010 11:49:32 AM
Carbon tetrachloride	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Chlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- B Analyte detected in the associated Method Blank
- E Estimated value
- H Holding times for preparation or analysis exceeded
- J Analyte detected below quantitation limits
- MCL Maximum Contaminant Level
- NC Non-Chlorinated
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitation Limit
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: *23-Mar-10*

CLIENT:	Western Refining Southwest, Gallup	**Client Sample ID:**	BZ Packing
Lab Order:	1002390	**Collection Date:**	2/17/2010 1:00:00 PM
Project:	Rolloff Box 20 B25	**Date Received:**	2/19/2010
Lab ID:	1002390-01	**Matrix:**	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260B: VOLATILES						Analyst: **DAM**
Chloroethane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Chloroform	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Chloromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
2-Chlorotoluene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
4-Chlorotoluene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
cis-1,2-DCE	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
cis-1,3-Dichloropropene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dibromo-3-chloropropane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Dibromochloromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Dibromomethane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dichlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,3-Dichlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,4-Dichlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Dichlorodifluoromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1-Dichloroethane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1,1-Dichloroethene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dichloropropane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,3-Dichloropropane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
2,2-Dichloropropane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1,1-Dichloropropene	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Hexachlorobutadiene	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
2-Hexanone	ND	25		mg/Kg	50	2/22/2010 11:49:32 AM
Isopropylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
4-Isopropyltoluene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
4-Methyl-2-pentanone	ND	25		mg/Kg	50	2/22/2010 11:49:32 AM
Methylene chloride	ND	7.5		mg/Kg	50	2/22/2010 11:49:32 AM
n-Butylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
n-Propylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
sec-Butylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Styrene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
tert-Butylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1,1,2-Tetrachloroethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1,2,2-Tetrachloroethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Tetrachloroethene (PCE)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
trans-1,2-DCE	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
trans-1,3-Dichloropropene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2,3-Trichlorobenzene	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1,2,4-Trichlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1,1-Trichloroethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1,2-Trichloroethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Trichloroethene (TCE)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- B Analyte detected in the associated Method Blank
- E Estimated value
- H Holding times for preparation or analysis exceeded
- J Analyte detected below quantitation limits
- MCL Maximum Contaminant Level
- NC Non-Chlorinated
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitation Limit
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: *23-Mar-10*

CLIENT:	Western Refining Southwest, Gallup	**Client Sample ID:**	BZ Packing
Lab Order:	1002390	**Collection Date:**	2/17/2010 1:00:00 PM
Project:	Rolloff Box 20 B25	**Date Received:**	2/19/2010
Lab ID:	1002390-01	**Matrix:**	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260B: VOLATILES						Analyst: **DAM**
Trichlorofluoromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2,3-Trichloropropane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Vinyl chloride	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Xylenes, Total	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Surr: 1,2-Dichloroethane-d4	94.9	59.5-119		%REC	50	2/22/2010 11:49:32 AM
Surr: 4-Bromofluorobenzene	97.0	57.9-141		%REC	50	2/22/2010 11:49:32 AM
Surr: Dibromofluoromethane	99.2	65.4-122		%REC	50	2/22/2010 11:49:32 AM
Surr: Toluene-d8	90.0	81.1-112		%REC	50	2/22/2010 11:49:32 AM
PAINT FILTER TEST						Analyst: **KS**
Free Liquid	Neg	0		Pos/Neg	1	3/17/2010 10:30:00 AM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	MCL	Maximum Contaminant Level
NC	Non-Chlorinated	ND	Not Detected at the Reporting Limit
PQL	Practical Quantitation Limit	S	Spike recovery outside accepted recovery limits

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REPORT OF ANALYSIS

Anne Thorne
Hall Environmental Analysis Laborat
4901 Hawkins NE
Albuquerque, NM 87109

March 22, 2010

ESC Sample # : L449530-01

Site ID :

Project # : 1002390

Date Received : March 16, 2010
Description : 1002390

Sample ID : BZ PACKING

Collected By :
Collection Date : 02/17/10 13:00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Corrosivity	Non-Corrosive			9040C	03/20/10	1
Ignitability	See Footnote		Deg. F	D93/1010A	03/17/10	1
Reactive CN (SW846 7.3.3.2)	BDL	0.125	mg/kg	9012B	03/18/10	1
Reactive Sulf.(SW846 7.3.4.1)	BDL	25.	mg/kg	9034/9030B	03/18/10	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.

Reported: 03/22/10 17:13 Printed: 03/22/10 17:14
L449530-01 (IGNITABILITY) - Did Not Ignite @ 170 F

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8015B: Diesel Range Organics											
Sample ID: MB-21679		*MBLK*				Batch ID:	**21679**	Analysis Date:		3/18/2010 9:41:52 AM	
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Motor Oil Range Organics (MRO)	ND	mg/Kg	50								
Sample ID: LCS-21679		*LCS*				Batch ID:	**21679**	Analysis Date:		3/18/2010 7:21:37 PM	
Diesel Range Organics (DRO)	49.40	mg/Kg	10	50	0	98.8	64.6	116			
Sample ID: LCSD-21679		*LCSD*				Batch ID:	**21679**	Analysis Date:		3/18/2010 10:53:47 AM	
Diesel Range Organics (DRO)	54.18	mg/Kg	10	50	0	108	64.6	116	9.23	17.4	
Method: EPA Method 8015B: Gasoline Range											
Sample ID: MB-21434		*MBLK*				Batch ID:	**21434**	Analysis Date:		2/25/2010 8:57:06 PM	
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0								
Sample ID: 2.5UG GRO LCS		*LCS*				Batch ID:	**21434**	Analysis Date:		2/25/2010 8:26:49 PM	
Gasoline Range Organics (GRO)	27.14	mg/Kg	5.0	25	1.96	101	77.7	135			
Sample ID: LCS-21680		*LCS*				Batch ID:	**21680**	Analysis Date:		3/22/2010 10:59:27 PM	
Gasoline Range Organics (GRO)	23.62	mg/Kg	5.0	25	1.41	88.8	77.7	135			
Sample ID: LCSD-21680		*LCSD*				Batch ID:	**21680**	Analysis Date:		3/22/2010 11:29:43 PM	
Gasoline Range Organics (GRO)	23.39	mg/Kg	5.0	25	1.41	87.9	77.7	135	0.979	11.6	

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	NC	Non-Chlorinated
ND	Not Detected at the Reporting Limit	R	RPD outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8260B: VOLATILES											
Sample ID: mb-21434		*MBLK*				Batch ID:	**21434**	Analysis Date:	2/22/2010 3:07:55 PM		
Benzene	ND	mg/Kg	0.050								
Toluene	ND	mg/Kg	0.050								
Ethylbenzene	ND	mg/Kg	0.050								
Methyl tert-butyl ether (MTBE)	ND	mg/Kg	0.050								
1,2,4-Trimethylbenzene	ND	mg/Kg	0.050								
1,3,5-Trimethylbenzene	ND	mg/Kg	0.050								
1,2-Dichloroethane (EDC)	ND	mg/Kg	0.050								
1,2-Dibromoethane (EDB)	ND	mg/Kg	0.050								
Naphthalene	ND	mg/Kg	0.10								
1-Methylnaphthalene	ND	mg/Kg	0.20								
2-Methylnaphthalene	ND	mg/Kg	0.20								
Acetone	ND	mg/Kg	0.75								
Bromobenzene	ND	mg/Kg	0.050								
Bromodichloromethane	ND	mg/Kg	0.050								
Bromoform	ND	mg/Kg	0.050								
Bromomethane	ND	mg/Kg	0.10								
2-Butanone	ND	mg/Kg	0.50								
Carbon disulfide	ND	mg/Kg	0.50								
Carbon tetrachloride	ND	mg/Kg	0.10								
Chlorobenzene	ND	mg/Kg	0.050								
Chloroethane	ND	mg/Kg	0.10								
Chloroform	ND	mg/Kg	0.050								
Chloromethane	ND	mg/Kg	0.050								
2-Chlorotoluene	ND	mg/Kg	0.050								
4-Chlorotoluene	ND	mg/Kg	0.050								
cis-1,2-DCE	ND	mg/Kg	0.050								
cis-1,3-Dichloropropene	ND	mg/Kg	0.050								
1,2-Dibromo-3-chloropropane	ND	mg/Kg	0.10								
Dibromochloromethane	ND	mg/Kg	0.050								
Dibromomethane	ND	mg/Kg	0.10								
1,2-Dichlorobenzene	ND	mg/Kg	0.050								
1,3-Dichlorobenzene	ND	mg/Kg	0.050								
1,4-Dichlorobenzene	ND	mg/Kg	0.050								
Dichlorodifluoromethane	ND	mg/Kg	0.050								
1,1-Dichloroethane	ND	mg/Kg	0.10								
1,1-Dichloroethene	ND	mg/Kg	0.050								
1,2-Dichloropropane	ND	mg/Kg	0.050								
1,3-Dichloropropane	ND	mg/Kg	0.050								
2,2-Dichloropropane	ND	mg/Kg	0.10								
1,1-Dichloropropene	ND	mg/Kg	0.10								
Hexachlorobutadiene	ND	mg/Kg	0.10								
2-Hexanone	ND	mg/Kg	0.50								
Isopropylbenzene	ND	mg/Kg	0.050								
4-Isopropyltoluene	ND	mg/Kg	0.050								

Qualifiers:

- E Estimated value
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- H Holding times for preparation or analysis exceeded
- NC Non-Chlorinated
- R RPD outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8260B: VOLATILES											
Sample ID: mb-21434		*MBLK*				Batch ID:	**21434**	Analysis Date:	2/22/2010 3:07:55 PM		
4-Methyl-2-pentanone	ND	mg/Kg	0.50								
Methylene chloride	ND	mg/Kg	0.15								
n-Butylbenzene	ND	mg/Kg	0.050								
n-Propylbenzene	ND	mg/Kg	0.050								
sec-Butylbenzene	ND	mg/Kg	0.050								
Styrene	ND	mg/Kg	0.050								
tert-Butylbenzene	ND	mg/Kg	0.050								
1,1,1,2-Tetrachloroethane	ND	mg/Kg	0.050								
1,1,2,2-Tetrachloroethane	ND	mg/Kg	0.050								
Tetrachloroethene (PCE)	ND	mg/Kg	0.050								
trans-1,2-DCE	ND	mg/Kg	0.050								
trans-1,3-Dichloropropene	ND	mg/Kg	0.050								
1,2,3-Trichlorobenzene	ND	mg/Kg	0.10								
1,2,4-Trichlorobenzene	ND	mg/Kg	0.050								
1,1,1-Trichloroethane	ND	mg/Kg	0.050								
1,1,2-Trichloroethane	ND	mg/Kg	0.050								
Trichloroethene (TCE)	ND	mg/Kg	0.050								
Trichlorofluoromethane	ND	mg/Kg	0.050								
1,2,3-Trichloropropane	ND	mg/Kg	0.10								
Vinyl chloride	ND	mg/Kg	0.050								
Xylenes, Total	ND	mg/Kg	0.10								
Sample ID: mb-21680		*MBLK*				Batch ID:	**21680**	Analysis Date:	3/18/2010 7:25:29 PM		
Benzene	ND	mg/Kg	0.050								
Toluene	ND	mg/Kg	0.050								
Ethylbenzene	ND	mg/Kg	0.050								
Methyl tert-butyl ether (MTBE)	ND	mg/Kg	0.050								
1,2,4-Trimethylbenzene	ND	mg/Kg	0.050								
1,3,5-Trimethylbenzene	ND	mg/Kg	0.050								
1,2-Dichloroethane (EDC)	ND	mg/Kg	0.050								
1,2-Dibromoethane (EDB)	ND	mg/Kg	0.050								
Naphthalene	ND	mg/Kg	0.10								
1-Methylnaphthalene	ND	mg/Kg	0.20								
2-Methylnaphthalene	ND	mg/Kg	0.20								
Acetone	ND	mg/Kg	0.75								
Bromobenzene	ND	mg/Kg	0.050								
Bromodichloromethane	ND	mg/Kg	0.050								
Bromoform	ND	mg/Kg	0.050								
Bromomethane	ND	mg/Kg	0.10								
2-Butanone	ND	mg/Kg	0.50								
Carbon disulfide	ND	mg/Kg	0.50								
Carbon tetrachloride	ND	mg/Kg	0.10								
Chlorobenzene	ND	mg/Kg	0.050								
Chloroethane	ND	mg/Kg	0.10								
Chloroform	ND	mg/Kg	0.050								

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	NC	Non-Chlorinated
ND	Not Detected at the Reporting Limit	R	RPD outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8260B: VOLATILES											
Sample ID: mb-21680		*MBLK*					Batch ID: **21680**		Analysis Date:	3/18/2010 7:25:29 PM	
Chloromethane	ND	mg/Kg	0.050								
2-Chlorotoluene	ND	mg/Kg	0.050								
4-Chlorotoluene	ND	mg/Kg	0.050								
cis-1,2-DCE	ND	mg/Kg	0.050								
cis-1,3-Dichloropropene	ND	mg/Kg	0.050								
1,2-Dibromo-3-chloropropane	ND	mg/Kg	0.10								
Dibromochloromethane	ND	mg/Kg	0.050								
Dibromomethane	ND	mg/Kg	0.10								
1,2-Dichlorobenzene	ND	mg/Kg	0.050								
1,3-Dichlorobenzene	ND	mg/Kg	0.050								
1,4-Dichlorobenzene	ND	mg/Kg	0.050								
Dichlorodifluoromethane	ND	mg/Kg	0.050								
1,1-Dichloroethane	ND	mg/Kg	0.10								
1,1-Dichloroethene	ND	mg/Kg	0.050								
1,2-Dichloropropane	ND	mg/Kg	0.050								
1,3-Dichloropropane	ND	mg/Kg	0.050								
2,2-Dichloropropane	ND	mg/Kg	0.10								
1,1-Dichloropropene	ND	mg/Kg	0.10								
Hexachlorobutadiene	ND	mg/Kg	0.10								
2-Hexanone	ND	mg/Kg	0.50								
Isopropylbenzene	ND	mg/Kg	0.050								
4-Isopropyltoluene	ND	mg/Kg	0.050								
4-Methyl-2-pentanone	ND	mg/Kg	0.50								
Methylene chloride	ND	mg/Kg	0.15								
n-Butylbenzene	ND	mg/Kg	0.050								
n-Propylbenzene	ND	mg/Kg	0.050								
sec-Butylbenzene	ND	mg/Kg	0.050								
Styrene	ND	mg/Kg	0.050								
tert-Butylbenzene	ND	mg/Kg	0.050								
1,1,1,2-Tetrachloroethane	ND	mg/Kg	0.050								
1,1,2,2-Tetrachloroethane	ND	mg/Kg	0.050								
Tetrachloroethene (PCE)	ND	mg/Kg	0.050								
trans-1,2-DCE	ND	mg/Kg	0.050								
trans-1,3-Dichloropropene	ND	mg/Kg	0.050								
1,2,3-Trichlorobenzene	ND	mg/Kg	0.10								
1,2,4-Trichlorobenzene	ND	mg/Kg	0.050								
1,1,1-Trichloroethane	ND	mg/Kg	0.050								
1,1,2-Trichloroethane	ND	mg/Kg	0.050								
Trichloroethene (TCE)	ND	mg/Kg	0.050								
Trichlorofluoromethane	ND	mg/Kg	0.050								
1,2,3-Trichloropropane	ND	mg/Kg	0.10								
Vinyl chloride	ND	mg/Kg	0.050								
Xylenes, Total	ND	mg/Kg	0.10								
Sample ID: lcs-21434		*LCS*					Batch ID: **21434**		Analysis Date:	2/22/2010 2:39:35 PM	

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	NC	Non-Chlorinated
ND	Not Detected at the Reporting Limit	R	RPD outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8260B: VOLATILES											
Sample ID: lcs-21434		*LCS*				Batch ID:	**21434**	Analysis Date:		2/22/2010 2:39:35 PM	
Benzene	1.008	mg/Kg	0.050	1	0	101	84.5	114			
Toluene	1.083	mg/Kg	0.050	1	0	108	85.4	109			
Chlorobenzene	1.103	mg/Kg	0.050	1	0.0058	110	86.8	110			
1,1-Dichloroethene	1.088	mg/Kg	0.050	1	0	109	74.4	129			
Trichloroethene (TCE)	1.045	mg/Kg	0.050	1	0	104	77.8	114			
Sample ID: lcs-21680		*LCS*				Batch ID:	**21680**	Analysis Date:		3/18/2010 6:29:11 PM	
Benzene	0.9951	mg/Kg	0.050	1	0	99.5	84.5	114			
Toluene	1.003	mg/Kg	0.050	1	0	100	85.4	109			
Chlorobenzene	0.9578	mg/Kg	0.050	1	0	95.8	86.8	110			
1,1-Dichloroethene	1.186	mg/Kg	0.050	1	0	119	74.4	129			
Trichloroethene (TCE)	1.002	mg/Kg	0.050	1	0	100	77.8	114			
Sample ID: lcsd-21680		*LCSD*				Batch ID:	**21680**	Analysis Date:		3/18/2010 6:57:23 PM	
Benzene	1.022	mg/Kg	0.050	1	0	102	84.5	114	2.71	20	
Toluene	1.063	mg/Kg	0.050	1	0	106	85.4	109	5.87	20	
Chlorobenzene	1.008	mg/Kg	0.050	1	0	101	86.8	110	5.09	20	
1,1-Dichloroethene	1.179	mg/Kg	0.050	1	0	118	74.4	129	0.572	20	
Trichloroethene (TCE)	0.9830	mg/Kg	0.050	1	0	98.3	77.8	114	1.90	20	
Method: MERCURY, TCLP											
Sample ID: 1002390-01BMSD		*MSD*				Batch ID:	**21513**	Analysis Date:		3/1/2010 3:40:41 PM	
Mercury	ND	mg/L	0.020	0.005	0	97.3	75	125	0	20	
Sample ID: MB-21513		*MBLK*				Batch ID:	**21513**	Analysis Date:		3/1/2010 3:17:26 PM	
Mercury	ND	mg/L	0.020								
Sample ID: LCS-21513		*LCS*				Batch ID:	**21513**	Analysis Date:		3/1/2010 3:19:10 PM	
Mercury	ND	mg/L	0.020	0.005	0	97.1	80	120			
Sample ID: 1002390-01BMS		*MS*				Batch ID:	**21513**	Analysis Date:		3/1/2010 3:38:52 PM	
Mercury	ND	mg/L	0.020	0.005	0	96.6	75	125			

Qualifiers:

- E Estimated value
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- H Holding times for preparation or analysis exceeded
- NC Non-Chlorinated
- R RPD outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 6010B: TCLP Metals											
Sample ID: MB-21486		*MBLK*				Batch ID:	**21486**	Analysis Date:	2/26/2010 1:49:07 PM		
Arsenic	ND	mg/L	5.0								
Barium	ND	mg/L	100								
Cadmium	ND	mg/L	1.0								
Chromium	ND	mg/L	5.0								
Lead	ND	mg/L	5.0								
Selenium	ND	mg/L	1.0								
Silver	ND	mg/L	5.0								
Sample ID: LCS-21486		*LCS*				Batch ID:	**21486**	Analysis Date:	2/26/2010 1:51:31 PM		
Arsenic	ND	mg/L	5.0	0.5	0	105	80	120			
Barium	ND	mg/L	100	0.5	0.001	94.7	80	120			
Cadmium	ND	mg/L	1.0	0.5	0	102	80	120			
Chromium	ND	mg/L	5.0	0.5	0	96.0	80	120			
Lead	ND	mg/L	5.0	0.5	0	91.3	80	120			
Selenium	ND	mg/L	1.0	0.5	0	108	80	120			
Silver	ND	mg/L	5.0	0.5	0.0014	104	80	120			

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	NC	Non-Chlorinated
ND	Not Detected at the Reporting Limit	R	RPD outside accepted recovery limits

Chain-of-Custody Record

Client: WESTERN-REFINING
Gallup Refinery
Mailing Address: RT 3 Box 9
Gallup NM 87301
Phone #: 505 722 3227
email or Fax#: 505 722 3837
QA/QC Package:
☐ Standard ☐ Level 4 (Full Validation)
☐ Other
☐ EDD (Type)

Turn-Around Time:
☒ Standard ☐ Rush
Project Name: Rolloff Box 20B25
Project #: BENZENE STRIPPING PACKING 60 DAY EXPIRATION NOTICE
Project Manager: THURMAN LARSEN
Sampler:
On Ice: ☒ Yes ☐ No
Sample Temperature: 5.1

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 1002390	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals TCLP	Anions ($F, Cl, NO_3, NO_2, PO_4, SO_4$)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Total Volatiles-VOC				Air Bubbles (Y or N)
02-17-10	1:00	Soil	BZ Packing	QT-2	—	1							X					X				

Date	Time	Relinquished by:	Received by:	Date	Time
02-18-10				2/19/10	840
Date:	Time:	Relinquished by:	Received by:	Date	Time

Remarks: Add 8015 D/R/G & RCI + PF. EDE 3/12

Re-Certification of Generator's Non-Hazardous Waste Profile Sheet

Profile #: 100168AZ New Expiration Date: _____

A. GENERATOR INFORMATON

1. Generator Name: Western Refining SW Gallup
2. Address: I-40 Exit 39, Jamestown, NM 87437
3. Technical Contact: Polly Wagner Title: Agent for Western Refining SW Gallup
4. Telephone: 505-998-4143 Fax #: 505-998-4343
5. Email: pwagner@Rinchem.com

B. BILLING INFORMATION - Optional (Mail WM Invoices To:) ☐ Same as above

1. Company Name: Rinchem Co Inc
2. Address: 6133 Edith Blvd NE, Albuquerque, NM 87107
3. Contact: Polly Wagner Title: _____
4. Telephone: 505-998-4143 P.O. Box: _____
5. Special Billing Requirements: _____
6. Email: pwagner@Rinchem.com

C. RECERTIFICATION INFORMATION

1. Waste Name: Benzene Stripping Packaging
2. Have you obtained any laboratory analysis of this waste within the past year? ☐ Yes ☐ No
3. Have you changed the raw materials used in the waste generating process or the waste generating process itself? ☐ Yes ☐ No
4. Is the laboratory analysis and/or other pertinent information previously submitted still representative of the waste as presently generated? ☐ Yes ☐ No

NOTE: IF YOU ANSWERED YES TO QUESTION 2 OR 3 LISTED ABOVE, PLEASE ATTACH APPROPRIATE DOCUMENTATION.

D. RECERTIFICATION STATEMENT.

By signing this form, the generator hereby certifies: The information provided in this document, the attached Waste Management Generator's Waste Profile Sheet, and all other attached documents contain true and accurate descriptions of this waste material. All new information regarding known or suspected hazards in the possession of the generator has been disclosed. The Generator hereby certifies this waste is not a "Hazardous Waste" as defined by the USEPA or Canadian Federal regulation and/or the state/province and this waste does not contain regulated radioactive materials or regulated concentrations of PCB's.

Name: (Print) Thurman B. Larsen Title: Env. Engr

Signature: _____ Date: 3/9/10

This is an extension of the original WM Decision. All conditions continue to apply.

Acceptable for use in the following states as sanctioned by Waste Management's waste review and approval process. Some waste streams will require the use of a new profile rather than the re-certification form.

AL, AR, CO, DE, FL, GA, IL, IN, KY, LA, MA, MD, ME, MI, MS, NC, NH, NY, OK, SC, TX, & VA.

FOR WM USE ONLY

Management Method: ☐ Landfill ☐ Bioremediation Approval Decision: ☐ Approved ☐ Not Approved

☐ Non-hazardous solidification ☐ Other: _____ Waste Approval Expiration Date: _____

☐ Transfer ☐ See attached conditions

Management Facility Precautions, Special Handling Procedures or Limitation on approval: _____

☐ Shall not contain free liquid
☐ Shipment must be scheduled into disposal facility
☐ Approval number must accompany each shipment
☐ Waste Manifest must accompany load

WM Authorization Name / Title: _____ Date: _____

State Authorization (if Required): _____ Date: _____

HALL
ENVIRONMENTAL
ANALYSIS
LABORATORY

Ref: Profile# 100168 AZ
RC 7145/8464

COVER LETTER

Tuesday, March 02, 2010

Thurman B. Larsen
Western Refining Southwest, Gallup
Rt. 3 Box 7
Gallup, NM 87301

TEL: (505) 722-0258
FAX (505) 722-0210

RE: Rolloff Box 20 B25

Order No.: 1002390

Dear Thurman B. Larsen:

Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 2/19/2010 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites.

Reporting limits are determined by EPA methodology.

Please do not hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

For Andy Freeman, Laboratory Manager

NM Lab # NM9425 NM0901
AZ license # AZ0682
ORELAP Lab # NM100001
Texas Lab# T104704424-08-TX

Hall Environmental Analysis Laboratory, Inc.

Date: *02-Mar-10*

CLIENT:	Western Refining Southwest, Gallup	**Client Sample ID:**	BZ Packing
Lab Order:	1002390	**Collection Date:**	2/17/2010 1:00:00 PM
Project:	Rolloff Box 20 B25	**Date Received:**	2/19/2010
Lab ID:	1002390-01	**Matrix:**	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
MERCURY, TCLP						Analyst: **RAGS**
Mercury	ND	0.020		mg/L	1	3/1/2010 3:33:21 PM
EPA METHOD 6010B: TCLP METALS						Analyst: **RAGS**
Arsenic	ND	5.0		mg/L	1	2/26/2010 2:22:39 PM
Barium	ND	100		mg/L	1	2/26/2010 2:22:39 PM
Cadmium	ND	1.0		mg/L	1	2/26/2010 2:22:39 PM
Chromium	ND	5.0		mg/L	1	2/26/2010 2:22:39 PM
Lead	ND	5.0		mg/L	1	2/26/2010 2:22:39 PM
Selenium	ND	1.0		mg/L	1	2/26/2010 2:22:39 PM
Silver	ND	5.0		mg/L	1	2/26/2010 2:22:39 PM
EPA METHOD 8260B: VOLATILES						Analyst: **DAM**
Benzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Toluene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Ethylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Methyl tert-butyl ether (MTBE)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2,4-Trimethylbenzene	4.7	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,3,5-Trimethylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dichloroethane (EDC)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dibromoethane (EDB)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Naphthalene	25	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1-Methylnaphthalene	220	10		mg/Kg	50	2/22/2010 11:49:32 AM
2-Methylnaphthalene	260	20		mg/Kg	100	2/22/2010 3:36:13 PM
Acetone	ND	38		mg/Kg	50	2/22/2010 11:49:32 AM
Bromobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Bromodichloromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Bromoform	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Bromomethane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
2-Butanone	ND	25		mg/Kg	50	2/22/2010 11:49:32 AM
Carbon disulfide	ND	25		mg/Kg	50	2/22/2010 11:49:32 AM
Carbon tetrachloride	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Chlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Chloroethane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Chloroform	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Chloromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
2-Chlorotoluene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
4-Chlorotoluene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
cis-1,2-DCE	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
cis-1,3-Dichloropropene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dibromo-3-chloropropane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Dibromochloromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Dibromomethane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	MCL	Maximum Contaminant Level
NC	Non-Chlorinated	ND	Not Detected at the Reporting Limit
PQL	Practical Quantitation Limit	S	Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Date: *02-Mar-10*

CLIENT:	Western Refining Southwest, Gallup	**Client Sample ID:**	BZ Packing
Lab Order:	1002390	**Collection Date:**	2/17/2010 1:00:00 PM
Project:	Rolloff Box 20 B25	**Date Received:**	2/19/2010
Lab ID:	1002390-01	**Matrix:**	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260B: VOLATILES						Analyst: **DAM**
1,2-Dichlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,3-Dichlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,4-Dichlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Dichlorodifluoromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1-Dichloroethane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1,1-Dichloroethene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2-Dichloropropane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,3-Dichloropropane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
2,2-Dichloropropane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1,1-Dichloropropene	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Hexachlorobutadiene	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
2-Hexanone	ND	25		mg/Kg	50	2/22/2010 11:49:32 AM
Isopropylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
4-Isopropyltoluene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
4-Methyl-2-pentanone	ND	25		mg/Kg	50	2/22/2010 11:49:32 AM
Methylene chloride	ND	7.5		mg/Kg	50	2/22/2010 11:49:32 AM
n-Butylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
n-Propylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
sec-Butylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Styrene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
tert-Butylbenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1,1,2-Tetrachloroethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1,2,2-Tetrachloroethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Tetrachloroethene (PCE)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
trans-1,2-DCE	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
trans-1,3-Dichloropropene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2,3-Trichlorobenzene	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
1,2,4-Trichlorobenzene	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1,1-Trichloroethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,1,2-Trichloroethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Trichloroethene (TCE)	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Trichlorofluoromethane	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
1,2,3-Trichloropropane	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Vinyl chloride	ND	2.5		mg/Kg	50	2/22/2010 11:49:32 AM
Xylenes, Total	ND	5.0		mg/Kg	50	2/22/2010 11:49:32 AM
Surr: 1,2-Dichloroethane-d4	94.9	59.5-119		%REC	50	2/22/2010 11:49:32 AM
Surr: 4-Bromofluorobenzene	97.0	57.9-141		%REC	50	2/22/2010 11:49:32 AM
Surr: Dibromofluoromethane	99.2	65.4-122		%REC	50	2/22/2010 11:49:32 AM
Surr: Toluene-d8	90.0	81.1-112		%REC	50	2/22/2010 11:49:32 AM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	MCL	Maximum Contaminant Level
NC	Non-Chlorinated	ND	Not Detected at the Reporting Limit
PQL	Practical Quantitation Limit	S	Spike recovery outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8260B: VOLATILES											
Sample ID: mb-21434		*MBLK*				Batch ID:	**21434**	Analysis Date:	2/22/2010 3:07:55 PM		
Benzene	ND	mg/Kg	0.050								
Toluene	ND	mg/Kg	0.050								
Ethylbenzene	ND	mg/Kg	0.050								
Methyl tert-butyl ether (MTBE)	ND	mg/Kg	0.050								
1,2,4-Trimethylbenzene	ND	mg/Kg	0.050								
1,3,5-Trimethylbenzene	ND	mg/Kg	0.050								
1,2-Dichloroethane (EDC)	ND	mg/Kg	0.050								
1,2-Dibromoethane (EDB)	ND	mg/Kg	0.050								
Naphthalene	ND	mg/Kg	0.10								
1-Methylnaphthalene	ND	mg/Kg	0.20								
2-Methylnaphthalene	ND	mg/Kg	0.20								
Acetone	ND	mg/Kg	0.75								
Bromobenzene	ND	mg/Kg	0.050								
Bromodichloromethane	ND	mg/Kg	0.050								
Bromoform	ND	mg/Kg	0.050								
Bromomethane	ND	mg/Kg	0.10								
2-Butanone	ND	mg/Kg	0.50								
Carbon disulfide	ND	mg/Kg	0.50								
Carbon tetrachloride	ND	mg/Kg	0.10								
Chlorobenzene	ND	mg/Kg	0.050								
Chloroethane	ND	mg/Kg	0.10								
Chloroform	ND	mg/Kg	0.050								
Chloromethane	ND	mg/Kg	0.050								
2-Chlorotoluene	ND	mg/Kg	0.050								
4-Chlorotoluene	ND	mg/Kg	0.050								
cis-1,2-DCE	ND	mg/Kg	0.050								
cis-1,3-Dichloropropene	ND	mg/Kg	0.050								
1,2-Dibromo-3-chloropropane	ND	mg/Kg	0.10								
Dibromochloromethane	ND	mg/Kg	0.050								
Dibromomethane	ND	mg/Kg	0.10								
1,2-Dichlorobenzene	ND	mg/Kg	0.050								
1,3-Dichlorobenzene	ND	mg/Kg	0.050								
1,4-Dichlorobenzene	ND	mg/Kg	0.050								
Dichlorodifluoromethane	ND	mg/Kg	0.050								
1,1-Dichloroethane	ND	mg/Kg	0.10								
1,1-Dichloroethene	ND	mg/Kg	0.050								
1,2-Dichloropropane	ND	mg/Kg	0.050								
1,3-Dichloropropane	ND	mg/Kg	0.050								
2,2-Dichloropropane	ND	mg/Kg	0.10								
1,1-Dichloropropene	ND	mg/Kg	0.10								
Hexachlorobutadiene	ND	mg/Kg	0.10								
2-Hexanone	ND	mg/Kg	0.50								
Isopropylbenzene	ND	mg/Kg	0.050								
4-Isopropyltoluene	ND	mg/Kg	0.050								

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	NC	Non-Chlorinated
ND	Not Detected at the Reporting Limit	R	RPD outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8260B: VOLATILES											
Sample ID: mb-21434		*MBLK*				Batch ID:	**21434**	Analysis Date:		2/22/2010 3:07:55 PM	
4-Methyl-2-pentanone	ND	mg/Kg	0.50								
Methylene chloride	ND	mg/Kg	0.15								
n-Butylbenzene	ND	mg/Kg	0.050								
n-Propylbenzene	ND	mg/Kg	0.050								
sec-Butylbenzene	ND	mg/Kg	0.050								
Styrene	ND	mg/Kg	0.050								
tert-Butylbenzene	ND	mg/Kg	0.050								
1,1,1,2-Tetrachloroethane	ND	mg/Kg	0.050								
1,1,2,2-Tetrachloroethane	ND	mg/Kg	0.050								
Tetrachloroethene (PCE)	ND	mg/Kg	0.050								
trans-1,2-DCE	ND	mg/Kg	0.050								
trans-1,3-Dichloropropene	ND	mg/Kg	0.050								
1,2,3-Trichlorobenzene	ND	mg/Kg	0.10								
1,2,4-Trichlorobenzene	ND	mg/Kg	0.050								
1,1,1-Trichloroethane	ND	mg/Kg	0.050								
1,1,2-Trichloroethane	ND	mg/Kg	0.050								
Trichloroethene (TCE)	ND	mg/Kg	0.050								
Trichlorofluoromethane	ND	mg/Kg	0.050								
1,2,3-Trichloropropane	ND	mg/Kg	0.10								
Vinyl chloride	ND	mg/Kg	0.050								
Xylenes, Total	ND	mg/Kg	0.10								
Sample ID: lcs-21434		*LCS*				Batch ID:	**21434**	Analysis Date:		2/22/2010 2:39:35 PM	
Benzene	1.008	mg/Kg	0.050	1	0	101	84.5	114			
Toluene	1.083	mg/Kg	0.050	1	0	108	85.4	109			
Chlorobenzene	1.103	mg/Kg	0.050	1	0.0058	110	86.8	110			
1,1-Dichloroethene	1.088	mg/Kg	0.050	1	0	109	74.4	129			
Trichloroethene (TCE)	1.045	mg/Kg	0.050	1	0	104	77.8	114			
Method: MERCURY, TCLP											
Sample ID: 1002390-01BMSD		*MSD*				Batch ID:	**21513**	Analysis Date:		3/1/2010 3:40:41 PM	
Mercury	ND	mg/L	0.020	0.005	0	97.3	75	125	0	20	
Sample ID: MB-21513		*MBLK*				Batch ID:	**21513**	Analysis Date:		3/1/2010 3:17:26 PM	
Mercury	ND	mg/L	0.020								
Sample ID: LCS-21513		*LCS*				Batch ID:	**21513**	Analysis Date:		3/1/2010 3:19:10 PM	
Mercury	ND	mg/L	0.020	0.005	0	97.1	80	120			
Sample ID: 1002390-01BMS		*MS*				Batch ID:	**21513**	Analysis Date:		3/1/2010 3:38:52 PM	
Mercury	ND	mg/L	0.020	0.005	0	96.6	75	125			

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	NC	Non-Chlorinated
ND	Not Detected at the Reporting Limit	R	RPD outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Western Refining Southwest, Gallup
Project: Rolloff Box 20 B25 **Work Order:** 1002390

Analyte	Result	Units	PQL	SPK Va	SPK ref	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 6010B: TCLP Metals											
Sample ID: MB-21486		*MBLK*				Batch ID:	**21486**	Analysis Date:	2/26/2010 1:49:07 PM		
Arsenic	ND	mg/L	5.0								
Barium	ND	mg/L	100								
Cadmium	ND	mg/L	1.0								
Chromium	ND	mg/L	5.0								
Lead	ND	mg/L	5.0								
Selenium	ND	mg/L	1.0								
Silver	ND	mg/L	5.0								
Sample ID: LCS-21486		*LCS*				Batch ID:	**21486**	Analysis Date:	2/26/2010 1:51:31 PM		
Arsenic	ND	mg/L	5.0	0.5	0	105	80	120			
Barium	ND	mg/L	100	0.5	0.001	94.7	80	120			
Cadmium	ND	mg/L	1.0	0.5	0	102	80	120			
Chromium	ND	mg/L	5.0	0.5	0	96.0	80	120			
Lead	ND	mg/L	5.0	0.5	0	91.3	80	120			
Selenium	ND	mg/L	1.0	0.5	0	108	80	120			
Silver	ND	mg/L	5.0	0.5	0.0014	104	80	120			

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	NC	Non-Chlorinated
ND	Not Detected at the Reporting Limit	R	RPD outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name **WESTERN REFINING GALLU** Date Received: **2/19/2010**

Work Order Number **1002390** Received by: **TLS**

Checklist completed by: Signature 2/19/10 Date Sample ID labels checked by: TJ Initials

Matrix: Carrier name: FedEx

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐		
Custody seals intact on shipping container/cooler?	Yes ☑	No ☐	Not Present ☐	Not Shipped ☐	
Custody seals intact on sample bottles?	Yes ☑	No ☐	N/A ☐		
Chain of custody present?	Yes ☑	No ☐			
Chain of custody signed when relinquished and received?	Yes ☑	No ☐			
Chain of custody agrees with sample labels?	Yes ☑	No ☐			
Samples in proper container/bottle?	Yes ☑	No ☐			
Sample containers intact?	Yes ☑	No ☐			
Sufficient sample volume for indicated test?	Yes ☑	No ☐			
All samples received within holding time?	Yes ☑	No ☐		Number of preserved bottles checked for pH:	
Water - VOA vials have zero headspace? No VOA vials submitted ☑		Yes ☐	No ☐		
Water - Preservation labels on bottle and cap match?	Yes ☐	No ☐	N/A ☑		
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑	*<2 >12 unless noted below.*	
Container/Temp Blank temperature?	**5.1°**	*<6° C Acceptable* If given sufficient time to cool.			

COMMENTS:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: _____

_____

_____

_____

_____

Corrective Action _____

_____

_____

Chain-of-Custody Record

Client: WESTERN - REFINING
Gallup Refinery
Mailing Address: RT 3 Box 9
Gallup NM 87301
Phone #: 505 722 3227
email or Fax#: 505 722 3837
QA/QC Package:
☐ Standard ☐ Level 4 (Full Validation)
☐ Other
☐ EDD (Type)

Turn-Around Time:
☒ Standard ☐ Rush
Project Name: Rolloff Box 20B25
Project #: BENZENE STRIPPING PACKING 60 DAY EXPIRATION NOTICE
Project Manager: Thurman Larsen
Sampler:
On Ice: ☑ Yes ☐ No
Sample Temperature: 5.1

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 100390	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals TCLP	Anions (F,Cl,NO_3,NO_2,PO_4,SO_4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Total volatiles-VOC				Air Bubbles (Y or N)
2-17-10	1:00	Soil	BZ Packing	GT-2	—	1							X					X				

Date: 2-18-10 Time: Relinquished by: [signature]
Received by: [signature] Date: 2/19/10 Time: 840
Date: Time: Relinquished by:
Received by: Date: Time:

Remarks:

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, May 20, 2010 4:55 PM
To: 'Larsen, Thurman'
Subject: RE: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Beck:

It appears that the TPH parameters exceeded from the analytical data results provided. OCD recommends the following: Western may resample for TPH and provide analytical data that meets the limits in D(3) below for OCD approval or Western could ship waste to an OCD permitted disposal facility in New Mexico.

Please let me know what Western wants to do. Thank you.

Per 19.15.35.8(C)3k NMAC, a person may dispose of the following wastes on a case-by-case basis with the Division's approval: tower packing material. The 19.15.35.8(D) Testing Provisions must be met (see below).

D. Testing.
19.15.35 NMAC
http://www.nmcpr.state.nm.us/nmac/parts/title19/19.015.0035.htm[1/16/2009 4:33:09 PM]
(1) The person applying for division approval to dispose of waste in a solid waste facility shall conduct testing required by 19.15.35.8 NMAC according to the Test Methods for Evaluating Solid Waste, EPA No. SW-846 and shall direct questions concerning the standards or a particular testing facility to the division.
(2) The testing facility shall conduct testing according to the test method listed:
(a) TPH: EPA method 418.1 or 8015 (DRO and GRO only) or an alternative, division-approved hydrocarbon analysis;
(b) TCLP: EPA Method 1311 or an alternative hazardous constituent analysis approved by the division;
(c) paint filter test: EPA Method 9095A;
(d) ignitability test: EPA Method 1030;
(e) corrosivity: EPA Method 1110;
(f) reactivity: test procedures and standards the division establishes on a case-by-case basis; and
(g) NORM. 20.3.14 NMAC.
(3) To be eligible for disposal pursuant to 19.15.35.8 NMAC, the concentration of substances the testing facility identifies during testing shall not exceed the following limits:
(a) benzene: 9.99 mg/kg;
(b) BTEX: 499.99 mg/kg (sum of all);
(c) TPH: 1000 mg/kg;
(d) hazardous air pollutants: the standards set forth in NESHAP; and
(e) TCLP:
(i) arsenic: 5 mg/l,
(ii) barium: 100 mg/l,
(iii) cadmium: 1 mg/l,
(iv) chromium: 5 mg/l,
(v) lead: 5 mg/l,
(vi) mercury: 0.2 mg/l,
(vii) selenium: 1 mg/l, and
(viii) silver: 5 mg/l.
[19.15.35.8 NMAC - Rp, 19.15.9.712 NMAC, 12/1/08]

Please be advised that OCD approval of this plan does not relieve Western Refining Southwest, Inc. of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Western Refining Southwest, Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Carl J. Chavez, CHMM

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

From: Larsen, Thurman [mailto:Thurman.Larsen@wnr.com]
Sent: Thursday, May 20, 2010 4:04 PM
To: Chavez, Carl J, EMNRD
Subject: FW: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Carl,
Here are the attachments to the previous e-mail on the benzene packing material. Let me know if you have any additional questions.
Thanks,

From: Larsen, Thurman
Sent: Wednesday, March 31, 2010 2:05 PM
To: Chavez, Carl J, EMNRD
Cc: Jones, Brad A., EMNRD; 'Polly J. Wagner'
Subject: Benzene Packing Material Request- Annual Approval (OCD Permit-GW-032)

Dear Mr. Chavez,

Reference: OCD Permit GW-032; 19.1535.8 NMAC
Request: ANNUAL APPROVAL for Benzene Packing Material to Waste Management (Rio Rancho)

In accordance with NMAC Regulations 19.15.35.8, Western Refining (Southwest) is requesting an annual approval for the disposal of the facilities Benzene Stripper Packing Material to the Waste Management Facility in Rio Rancho, NM via Rinchem. The accumulation of benzene packing material is a direct result of periodic replacement through maintenance activities so as to maintain the required benzene stripping efficiencies in order to satisfy the New Mexico Environmental Department Hazardous Waste Bureau (HWB). The Benzene Stripper Columns that contain the packing material are an essential part of the facilities Wastewater System.

A record search from the Oil Conservation Division (OCD) database was diligently conducted in an attempt to locate any reference to the approval of the benzene packing material from previous Permit Applications and OCD/Western Refining (Giant) Correspondence. However, as a result of this search, no direct or definitive conclusion was able to be determined granting Western approval from OCD. Several earlier correspondence letters mentioned the approval for installation of the benzene stripper, its relationship to the Wastewater Treatment Process, including implications that this material has been approved; however, references from this correspondence identifying the approval could not be located.

The above attachments include Waste Management Profile and the required analysis for the Agency to make a "determination" on the Benzene Packing Material. All previous analysis of this material has indicated that this material is non-hazardous. Therefore, Western Refining is requesting an Annual Approval for disposal of benzene packing material to Waste Management in Rio Rancho, NM. A sense of urgency in this matter is greatly appreciated. If you should require additional information, please contact me at (505) 722-0258.

Sincerely,
Beck Larsen- CHMM/REM
Environmental Engineer
Western Refining (Southwest)- Gallup Refinery

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, October 23, 2009 6:13 AM
To: Chavez, Carl J, EMNRD; 'gford@co.mckinley.nm.us'
Cc: 'Riege, Ed'
Subject: RE: Western Refining SW- Gallup Refinery (GW-032) Thoreau Red Rock Landfill w/ Special Waste Classification Request for OCD Approval of Waste

Mr. Ford:

After discussing the situation below with Oil Conservation Division waste specialists here in Santa Fe, they confirmed the conclusion in my message below.

If you wish to discuss this further, I recommend that you contact Brad Jones at (505) 476-3487. Thank you.

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

From: Chavez, Carl J, EMNRD
Sent: Thursday, October 22, 2009 2:32 PM
To: 'gford@co.mckinley.nm.us'
Cc: Riege, Ed
Subject: Western Refining SW- Gallup Refinery (GW-032) Thoreau Red Rock Landfill w/ Special Waste Classification Request for OCD Approval of Waste

Mr. Ford:

Re: OCD Approval to Receive Petroleum Contaminated Wastes from Gallup Refinery Landfill

Thank you for contacting me yesterday about the above subject.

After reviewing the OCD Discharge Permit and applicable Part 35 (Waste Disposal) Section 8 (see highlighted sections below), I regret to inform you that unless this is an emergency, the OCD Director cannot approve petroleum contaminated waste for disposal at your solid waste facility.

19.15.35.8 DISPOSAL OF CERTAIN NON-DOMESTIC WASTE AT SOLID WASTE FACILITIES:
A. A person may dispose of certain non-domestic waste arising from the exploration, development, production or storage of oil or gas; certain non-domestic waste arising from the oil field service industry; and certain non-domestic waste arising from oil or gas' transportation,
treatment or refinement at a solid waste facility in accordance with 19.15.35.8 NMAC.
B. Procedure.
(1) A person may dispose of waste listed in Paragraph (1) of Subsection D of 19.15.35.8 NMAC at a solid waste facility without the division's prior written authorization.
(2) A person may dispose of waste listed in Paragraph (2) of Subsection D of 19.15.35.8 NMAC at a solid waste facility after testing and the division's prior written authorization. Before the division grants authorization, the applicant for the authorization shall provide copies of
test results to the division and to the solid waste facility where the applicant will dispose of the waste. In appropriate cases and so long as a
representative sample is tested, the division may authorize disposal of a waste stream listed in Paragraph (2) of Subsection D of 19.15.35.8 NMAC

without individual testing of each delivery.
(3) A person may dispose of waste listed in Paragraph (3) of Subsection D of 19.15.35.8 NMAC at a solid waste facility on a case-by-case basis after testing the division may require and the division's prior written authorization. Before the division grants authorization, the
applicant for the authorization shall provide copies of test results to the division and to the solid waste facility where it will dispose of the waste.
(4) Simplified procedure for holders of discharge plans. Holders of an approved discharge plan may amend the discharge plan to provide for disposal of waste listed in Paragraph (2) of Subsection D of 19.15.35.8 NMAC and, as applicable, Paragraph (3) of Subsection D of
19.15.35.8 NMAC. If the division approves the amendment to the discharge plan, the holder may dispose of wastes listed in Paragraphs (2) and (3)
of Subsection D of 19.15.35.8 NMAC at a solid waste facility without obtaining the division's prior written authorization.

C. The following provisions apply to the types of waste described below as specified.
(1) The person disposing of the waste does not have to test the following waste before disposal:
(a) barrels, drums, five-gallon buckets or one-gallon containers so long as they are empty and EPA-clean;
(b) uncontaminated brush and vegetation arising from clearing operations;
(c) uncontaminated concrete;
(d) uncontaminated construction debris;
(e) non-friable asbestos and asbestos contaminated waste material, so long as the disposal complies with applicable federal regulations and state rules for non-friable asbestos materials and so long as the facility operator removes the asbestos from steel pipes and boilers
and, if applicable, recycles the steel;
(f) detergent buckets, so long as the buckets are completely empty;
(g) fiberglass tanks so long as the tank is empty, cut up or shredded and EPA clean;
(h) grease buckets, so long as empty and EPA clean;
(i) uncontaminated ferrous sulfate or elemental sulfur so long as recovery and sale as a raw material is not possible;
(j) metal plate and metal cable;
(k) office trash;
(l) paper and paper bags, so long as the paper bags are empty;
(m) plastic pit liners, so long as the person cleans them well;
(n) soiled rags or gloves, which if wet pass the paint filter test prior to disposal; or
(o) uncontaminated wood pallets.
(2) The person disposing of the waste shall test the following wastes for the substances indicated prior to disposal:
(a) activated alumina for TPH and BTEX;
(b) activated carbon for TPH and BTEX;
(c) amine filters, which the facility operator air-dries for at least 48 hours before testing, for BTEX;
(d) friable asbestos and asbestos-contaminated waste material, which the facility operator removes asbestos from steel pipes and boilers and, if applicable, recycles the steel before disposal, where the disposal otherwise complies with applicable federal regulations and state
rules for friable asbestos materials pursuant to NESHAP;
(e) cooling tower filters, which the facility operator drains and then air-dries for at least 48 hours before testing, for TCLP/chromium;
(f) dehydration filter media, which the facility operator drains and then air-dries for at least 48 hours before testing, for TPH and BTEX;
(g) gas condensate filters, which the facility operator drains and then air-dries for at least 48 hours before testing, for BTEX;
(h) glycol filters, which the facility operator drains and then air-dries for at least 48 hours before testing, for BTEX;
(i) iron sponge, which the facility operator oxidizes completely, for ignitability testing;
(j) junked pipes, valves and metal pipe for NORM;
(k) molecular sieves, which the facility operator cools in a non-hydrocarbon inert atmosphere and hydrates in ambient air for at least 24 hours before testing, for TPH and BTEX;
(l) pipe scale and other deposits removed from pipeline and equipment for TPH, TCLP/metals and NORM;
(m) produced water filters, which the facility operator drains and then air-dries for at least 48 hours before testing, for corrosivity;
(n) sandblasting sand for TCLP/metals or, if the division requires, TCLP/total metals; or
(o) waste oil filters, which the facility operator drains thoroughly of oil at least 24 hours before testing and recycles the oil and metal parts, for TCLP/metals.
(3) A person may dispose of the following wastes on a case-by-case basis with the division's approval:
(a) sulfur contaminated soil;
(b) catalysts;

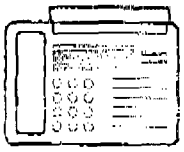
(c) contaminated soil other than petroleum contaminated soil;
(d) petroleum contaminated soil in the event of a director-declared emergency;
(e) contaminated concrete;
(f) demolition debris not otherwise specified in 19.15.35.8 NMAC;
(g) unused dry chemicals; in addition to testing the division requires, the person applying for division approval shall forward a copy of the material safety data sheet to the division and the solid waste facility on each chemical proposed for disposal;
(h) contaminated ferrous sulfate or elemental sulfur;
(i) unused pipe dope;
(j) support balls;
(k) tower packing materials;
(l) contaminated wood pallets;
(m) partial sacks of unused drilling mud; in addition to testing the division requires, the person applying for division approval shall forward a copy of the material safety data sheet to division and the solid waste facility at which the it will dispose of the partial sacks; or
(n) other wastes as applicable.

Please contact me if you have questions. Thank you.

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

F A X

NWNMRSWA
PO Box 1330
Thoreau, NM 87323
505 862-8402
bmoore@co.mckinley.nm.us



To: Carl J. Chavez, CHMM
Fax number: 505 476-3462

From: Billy Moore
Fax number: 505 862-7204

Date: 10/22/2009

Regarding:
Contaminated Soil

Phone number for follow-up:
505 862-8402 or 505 879-6407 cell

Comments:

Mr. Chavez

We are sending documentation about our Permit here at Red Rock Landfill, and our ability to take contaminated soil at our facility. Permit # SWM-051740(SP) Special Waste Landfill for: (Industrial solid waste – including approved OCD waste; sludge; Petroleum contaminated soils) Permit was issued on March20, 2009 and Expires on March 20, 2014.

Thank You
Billy Moore
Executive Director
NWNMRSWA
505 862-8402

Gary Ford
Operations Manager
NWNMRSWA
505 862-8402
Fax 505 862-7204

NEW MEXICO
ENVIRONMENT DEPARTMENT

Solid Waste Bureau

BILL RICHARDSON
Governor
DIANE DENISH
Lieutenant Governor

Harold Runnels Building – Room 2050
1190 St Francis Dr.
PO Box 5469 Santa Fe, NM 87502-5469
Phone (505) 827-2328 Fax (505) 827-2902
www.nmenv.state.nm.us

RON CURRY
Secretary
JON GOLDSTEIN
Deputy Secretary

April 1, 2009

Kit South
Red Rocks Regional Landfill
PO Box 1330
Thoreau, NM 87323

RE: RED ROCKS REGIONAL LANDFILL PERMIT RENEWAL AND MODIFICATION

Dear Mr. South:

Enclosed are the MSW and Special Waste Permit for the Red Rocks Regional Landfill pursuant to the Secretary's Final Order dated March 20, 2009.

The Final Order, the Hearing Officers Report and a summary list of the Final Order Conditions and specific Permit Application Stipulations are also attached to make sure the facility is aware of its regulatory obligations in operating the facility.

Please be aware that this is a conditional 5-year permit and if the applicant has been in compliance per the Final Condition stipulations they will be responsible for requesting an additional 15 year extension at least 90 days (approximately December 20, 2013) prior to the end of the conditional period (see Condition 4.d).

If you have any questions regarding this matter, please contact me at 505-827-2328.

Sincerely,

Terry Nelson
Permit Section Manager

Attachments: MSW & Special Waste Certificates
Final Order
Hearing Officers Report
Summary of Final Conditions & Application Stipulations

emcc: Chuck Akeley, Manager Enforcement Section, SWB
Benny Kling, EAV, SWB
Bill Schueler, Permit Section, SWB

SUMMARY OF PERMIT FINAL CONDITIONS
RED ROCKS REGIONAL LANDFILL

Permit Issued: March 20, 2009 Expires: March 20, 2014
(Note: This a conditional 5 year permit with a potential 15 year conditional extension per Final order.)

Permit #: SWM -172203 MSW Landfill
Permit#: SWM – 051740(SP) Special Waste Landfill for: (Industrial solid waste –including approved OCD waste; sludge; petroleum contaminated soils)

Summary of Final Conditions (see Final Order for exact conditions):

2.	Allowed to dispose of residential, commercial, tires and construction & demolition debris solid waste
3.	May accept the following special wastes: industrial solid waste-including approved OCD waste, sludge and petroleum contaminated soils.
4.a	Continue to implement and update Affirmative Action Plan (AAP)
4.b	Conditional 5 year permit contingent upon compliance with no significant violations of the Act, SWR, permit conditions and Affirmative Action Plan. No significant violation means that no administrative compliance orders are written, and that no notices of violation or field citations are not resolved within a given timeframe.
4.c	Evaluate the AAP at least annually and update as necessary
4.d	Five year initial rehab period with potential fifteen year extended rehab period without permit revision if complaint with 4.b. Extended 15 year rehab period must be requested in writing by the Applicant a minimum of 90 days prior to the end of the first 5 year rehab period or on or about December 20, 2013.
4.e	Comply with all applicable regulatory requirements
4.f	Conditional permit is subject to revocation as listed
4.g	If permit is revoked landfill has 18 months to close.
4.h	Provide a timeline for new cell construction at least 30 days prior to starting and provide a copy of construction specs and drawings.
4.i	The Liner CQA report must be submitted and approved in writing by the Department and must be inspected by the Department prior to waste disposal in the new cell.
4.j	A tie-in detail between cell 9 and cell 1&2 must be submitted within 15 days of cell excavation for tie-in for Department approval and an "as-built" detail of the tie-in must be included in the CQA report.

Northwest New Mexico Regional Solid Waste Authority

Refinery Waste Disposal Management Plan

Introduction

The Northwest New Mexico Regional Solid Waste Authority (NWNMSWA) wishes to accept certain special waste from the Western Refinery located north of the Interstate 40 Interchange at Mile Post 39. The material has all been sampled and is inert material that has been utilized in the refinery process. The material will be delivered to the Red Rocks Regional Landfill for final disposal. This plan addresses 20.9.8, Special Waste Requirements, of the Solid Waste Rules.

Response to Applicable Solid Waste Rules

20.9.8.18 DISPOSAL OF SPECIAL WASTE NOT OTHERWISE SPECIFIED. Any solid waste facility owner or operator who wishes to be permitted to receive special wastes that do not have specified disposal requirements shall submit a disposal management plan, as specified in Subsection C of 20.9.3.9 NMAC, to the department for approval.

Response: The NWNMRSWA recognizes this opportunity and wishes to provide disposal of special wastes for specific industries in the service area.

20.9.8.19 MANIFEST REQUIREMENTS.

A. Each generator or his authorized agent shall prepare a manifest to accompany each load of special waste, including:

(1) the name, address and telephone number of the generator and origin of the special waste;
(2) the name, address and telephone number of all haulers in the order each will be transporting the waste;
(3) the name, site address, telephone number and identification number of the solid waste facility to which the waste is to be delivered;
(4) the type and proper name of waste being shipped;
(5) the total weight or volume of waste prior to shipment from the generator;
(6) the type and number of containers in the shipment; and
(7) any special handling instructions.

Response: NWNMRSWA requires manifests of all special waste generators.

B. The generator or his authorized agent shall sign the manifest and obtain the signature of the initial transporter and date of acceptance on the manifest, and shall retain a copy of the manifest. Each hauler shall obtain the signature of the individual who accepts the special waste for storage, further transportation or disposal, retain a copy of the manifest, and provide the original manifest to the next hauler or solid waste facility operator who receives the special waste.

Response: NWNMRSWA requires signed manifests of all special waste generator's.

C. The manifest shall accurately reflect the required information and shall be signed and dated by the generator and each hauler of the special waste, and by the solid waste facility owner or operator, acknowledging delivery, weight or volume, and receipt of the special waste. All signatories shall be duly authorized agents of their organizations. The generator shall keep a copy of the originating manifest for three years.

Response: NWNMRSWA inspects all manifests for completeness and for proper signatures.

D. Upon discovery of any significant discrepancy including, but not limited to, factual misrepresentation on the manifest, irregularities in transportation, discharges, or any unauthorized action in regard to the shipment, delivery, or disposal of the solid waste, the person discovering the discrepancy shall notify the department, the generator, hauler, and the solid waste facility operator in writing within 24 hours.

Response: Should the NWNMRSWA Red Rocks Regional Landfill staff find any errors, omissions, other issues with the manifest the staff will notify the New Mexico Environment Department immediately.

E. Within 30 days of receipt of a special waste shipment at the solid waste facility, the owner or operator shall send the original signed copy of the manifest to the generator, acknowledging receipt of the shipment. The facility owner or operator shall list any discrepancies on the manifest. Other methods of return of the manifest may be allowed upon specific approval from the secretary.

Response: NWNMRSWA will send the original signed copy of the manifest to the generator acknowledging receipt of the shipment as well as noting any discrepancies with the manifest.

F. A copy of the manifest shall be retained by each hauler, and solid waste facility operator for their operating records. The generator shall retain for a period of three years both the originating copy and the returned original manifest signed by the solid waste facility owner or operator and all haulers transporting the waste. Haulers shall retain a copy of the manifest for a period of three years.

Response: NWNMRSWA will retain copies of all manifests.

G. Copies of the manifest shall be retained by the facility owner or operator throughout any post-closure period.

Response: NWNMRSWA will retain copies of all manifests throughout the post-closure period.

Response to Applicable Oil Conservation Division Rules

19.15.9.712 DISPOSAL OF CERTAIN NON-DOMESTIC WASTE AT SOLID WASTE FACILITIES:

A. General. Certain non-domestic waste arising from the exploration, development, production or storage of crude oil or natural gas, certain non-domestic waste arising from the oil field service industry, and certain non-domestic waste arising from the transportation, treatment or refinement of crude oil or natural gas, may be disposed of at a solid waste facility.

Response: NWNMRSWA understands the option to accept certain non-domestic waste as described.

B. Definitions. The following words and phrases have particular meanings for purposes of this section:
(1) "BTEX.' The acronym "BTEX" in this section refers to benzene, toluene, ethylbenzene and xylene.

(2) "Discharge plan." A "discharge plan" is a plan submitted and approved by the division pursuant to NMSA 1978, Section 70-2-12(B)(22) (2000 Cum. Supp.) and rules and regulations of the water quality control commission.
(3) "EPA." The acronym "EPA" refers to the United States environmental protection agency.
(4) "EPA clean." The phrase "EPA Clean" refers to cleanliness standards established by the EPA in 40 C.F.R. Part 261, Section 261.7(b).
(5) "NESHAP." The acronym "NESHAP" refers to the National Emission Standards for Hazardous Air Pollutants of the EPA, 40 C.F.R. Part 61.
(6) "NORM." The acronym "NORM" refers to naturally occurring radioactive materials regulated by 20 NMAC 3.1, Subpart 14.
(7) "Section." "Section" or "this section" refers to Section 19.15.9.712 NMAC.
(8) "Solid waste facility." A "solid waste facility" is a facility permitted or authorized as a solid waste facility by the New Mexico environment department pursuant to the Solid Waste Act, NMSA 1978, Sections 74-9-1 *c/seq.* and rules and regulations of the environmental improvement board, to accept industrial solid waste or other special waste.
(9) "TCLP." The acronym "TCLP" in this section refers to the testing protocol established by the EPA in 40 C.F.R. Part 261, entitled "Toxicity Characteristic Leaching Procedure" or an alternative hazardous constituent analysis approved by the division.
(10) "TPH." The acronym "TPH" in this section refers to the phrase "total petroleum hydrocarbons".
(11) "Waste." The word "waste" refers to non-domestic waste resulting from the exploration, development, production or storage of crude oil or natural gas pursuant to NMSA 1978, Section 70-2-12(B)(21) and non-domestic waste arising from the oil field service industry, and certain non-domestic waste arising from the transportation, treatment or refinement of crude oil or natural gas pursuant to NMSA 1978, Section 70-2-12(B)(22).

Response: NWNMRSWA understands and accepts these definitions.

C. Procedure.

(1) Waste listed in Subsection D, Paragraph (1) of Section 19.15.9.712 NMAC. Waste listed in Subsection D, Paragraph (1) of Section 19.15.9.712 NMAC may be disposed of at a solid waste facility without prior written authorization of the division.

Response: NWNMRSWA recognizes this allowance.

(2) Waste listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC. Waste listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC may be disposed of at a solid waste facility after testing and prior written authorization of the division. Before

authorization is granted, copies of test results must be provided to the division and to the solid waste facility where the waste is to be disposed. Disposal may commence only after written authorization of the division. In appropriate cases and so long as a representative sample is tested, the division may authorize disposal of a waste stream listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC without individual testing of each delivery.

Response: NWNMRSWA recognizes the testing requirements and approval requirement.

(3) Waste listed in Subsection D, Paragraph (3) of Section 19.15.9.712 NMAC. Waste listed in Subsection D, Paragraph (3) of Section 19.15.9.712 NMAC may be disposed of at a solid waste facility on a case-by-case basis after testing required at the discretion of the division and after prior written authorization of the division. Before authorization is granted, copies of test results must be provided to the division and to the solid waste facility where the waste is to be disposed. Disposal may commence only after written authorization of the division.

Response: NWNMRSWA recognizes the testing and authorization requirements and that these are at the discretion of the division on a case-by-case basis.

(4) Simplified procedure for holders of discharge plans. Holders of an approved discharge plan may amend the discharge plan to provide for disposal of waste listed in waste listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC and, as applicable, Subsection D, Paragraph (3) of Section 19.15.9.712 NMAC. If the amendment to the discharge plan is approved, wastes listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC and Subsection 0, Paragraph (3) of Section 19.15.9.712 NMAC may be disposed of at a solid waste facility without the necessity of prior written authorization of the division.

Response: Not applicable unless the NWNMRSWA receives an amended discharge plan from the refinery that addresses the special wastes the refinery wishes to dispose. This discharge plan, if acceptable, will be filed in lieu of the written authorization from the Oil Conservation Division.

D. Waste governed by this section.

(1) Waste that does not require testing before disposal.

(a) Barrels, drums, 5-gallon buckets, 1-gallon containers so long as empty and EPA-clean.

(b) Uncontaminated brush and vegetation arising from clearing operations.

(c) Uncontaminated concrete.

(d) Uncontaminated construction debris.

(e) Non-friable asbestos and asbestos contaminated waste material, so long as the disposal complies with all applicable federal and state regulations for non-friable asbestos materials and so long as asbestos is removed from steel pipes and boilers and, if applicable, the steel recycled.

(f) Detergent buckets, so long as completely empty.

(g) Fiberglass tanks so long as the tank is empty, cut up or shredded, and EPA clean.

(h) Grease buckets, so long as empty and EPA clean.

(i) Uncontaminated ferrous sulfate or elemental sulfur so long as recovery and sale as a raw material is not possible.

(j) Metal plate and metal cable.

(k) Office trash.

(l) Paper and paper bags, so long as empty (paper bags).

(m) Plastic pit liners, so long as cleaned well.

(n) Soiled rags or gloves. If wet, must pass Paint Filter Test prior to disposal.

(o) Uncontaminated wood pallets.

Response: NWNMRSWA recognizes this list and will accept this waste as described.

(2) Waste that must be tested.

(a) Activated alumina must be tested for TPH and BTEX.

(b) Activated carbon must be tested for TPH and BTEX.

(c) Amine filters must be tested for BTEX (and air-dried for at least 48 hours before testing).

(d) Friable asbestos and asbestos-contaminated waste material must be tested pursuant to NESHAP (and so long as the disposal otherwise complies with all applicable federal and state regulations for friable asbestos materials, and so long as asbestos is removed from steel pipes and boilers and, if applicable, the steel should be recycled before disposal).

(e) Cooling tower filters must be tested for TCLP/chromium (and drained and then air-dried for at least 48 hours before testing).

(f) Dehydration filter media must be tested for TPH and BTEX (and drained and then air-dried for at least 48 hours before testing).

(g) Gas condensate filters must be tested for BTEX (and drained and then air-dried for at least 48 hours before testing).

(h) Glycol filters must be tested for BTEX (and drained and then air-dried for at least 48 hours before testing).

(i) Iron sponge must be oxidized completely and then undergo ignitability testing.

(j) Junked pipes, valves and metal pipe must be tested for NORM.

(k) Molecular sieve must be tested for TPH and BTEX (and must be cooled in a non-hydrocarbon inert atmosphere and hydrated in ambient air for at least 24 hours before testing).

(l) Pipe scale and other deposits removed from pipeline and equipment must be tested for TPH, TCLP/metals and NORM.

(m) Produced water filters must be tested for corrosivity (and drained and then airdried for at least 48 hours before testing).

(n) Sandblasting sand must be tested for TCLP/metals or, at the discretion of the division, TCLP/total metals.

(o) Waste oil filters must be tested for TCLP/metals (and must be drained thoroughly of oil for at least 24 hours before testing and oil and metal parts must be recycled).

Response: **NWNMRSWA recognizes this list and understands the testing requirements and will not accept this waste without proper testing, approval, and manifests.**

(3) Waste that may be disposed of on a case-by-case basis.

(a) Sulfur contaminated soil.

(b) Catalysts.

(c) Contaminated soil other than petroleum contaminated soil.

(d) Petroleum contaminated soil in the event of an emergency declared by the director.

(e) Contaminated concrete.

(f) Demolition debris not otherwise specified herein.

(g) Unused dry chemicals (in addition to any testing required by the division, a copy of the Material Safety Data Sheet shall be forwarded to the division and the solid waste facility on each chemical proposed for disposal).

(h) Contaminated ferrous sulfate or elemental sulfur.

(i) Unused pipe dope.

(j) Support balls.

(k) Tower packing materials.

(l) Contaminated wood pallets.

(m) Partial sacks of unused drilling mud (in addition to any testing required by the division, a copy of the Material Safety Data Sheet shall be forwarded to division and the solid waste facility at which the partial sacks will be disposed).

(n) Other wastes as applicable.

Response: NWNMRSWA recognizes this list and understands the testing requirements and will not accept this waste without proper testing, approval, and manifests. NWNMRSWA also understands these materials will be considered on a case-by-case basis.

E. Testing.

(1) General. Testing required herein shall be conducted according to the Test Methods for Evaluating Solid Waste, EPA No. SW-846. Any questions concerning the standards or a particular testing facility should be directed to the division.

Response: NWNMRSWA recognizes the testing requirements and will inspect all testing results provided by the generator to ensure the proper tests were performed.

(2) Methodology. Testing must be conducted according to the test method listed:

(a) TPH: EPA method 418.1 or 8015 (D-R-O and G-R-O only) or an alternative hydrocarbon analysis approved by the division.

(b) TCLP: EPA Method 1311 or an alternative hazardous constituent analysis approved by the division.

(c) Paint filter testing: EPA Method 9095A.

(d) Ignitability Test: EPA Method 1030.

(e) Corrosivity: EPA Method 1110.

(f) Reactivity: Test procedures and standards established on a case-by-case basis by the division.

(g) NORM. 20 NMAC 3.1, Subpart 14.

Response: NWNMRSWA recognizes the testing requirements and will inspect all testing results provided by the generator to ensure the proper tests were performed.

(3) Limits. To be eligible for disposal pursuant to this section, substances found during testing shall not exceed the following limits:

(a) Benzene: Less than 10 mg/kg.

(b) BTEX: Less than 500 mg/kg (sum of all)~

(c) TPH: Shall not exceed 1000 mg/kg.

(d) Hazardous air pollutants: Shall not exceed the standards set forth in NESHAP.

(e) TCLP: Shall not exceed the following:

(I) Arsenic: 5.0 mg/l
(ii) Barium: 100.0 mg/l
(iii) Cadmium: 1.0 mg/l
(iv) Chromium: *5.0* mg/l
(v) Lead: *5.0* mg/l
(vi) Mercury: 0.2 mg/l
(vii) Selenium: 1.0 mg/l
(viii) Silver: *5.0* mg/l

Response: NWNMRSWA recognizes the testing limits and will inspect all testing results provided by the generator to ensure the proper tests were performed and the results are acceptable.

Methods to Identify Special Waste

There are seven specific special wastes that will be accepted by the Red Rocks Regional Landfill from the Western Refinery. These wastes are:

Elemental Sulfer - This substance is used to treat the refinery-produced fuel gas to remove sulfer. Approximately 60 tons of sulfer per year will be disposed of at the landfill. The waste will be deposited on a quarterly basis.

Spent FCC Catalyst - This substance is not part of the hydrotreating or hydrorefining catalyst. It is not used in the process containing

benzene. Approximately 300 tons of FCC Catalyst per year will be disposed of at the landfill. The waste will be deposited on a monthly basis.

Spent Activated Alumina - A non-hazardous substance not utilized in areas of the refinery where hazardous materials are utilized or generated. Approximately 25 tons of Alumina per year will be disposed of at the landfill. The waste will be deposited every 2 months.

Petroleum Contaminated Soils – Various contamined soils from maintenance operations in the refinery. Approximately 750 tons of PCS will be disposed of at the landfill per year. The waste will be deposited on a quarterly basis.

Contaminated Soil (Non-Petroleum) - Various contaminated soils from maintenance operations in the refinery. Approximately 2 tons on Contaminated soil will be disposed of at the landfill per year. The waste will be deposited on a yearly basis.

Pipe and Tank Scale – generated from the maintenance operations on various storage tanks in the refinery. Approximately 2 tons of scale will be disposed of at the landfill per year. The waste will be deposited on a quarterly basis.

Sandblast Sand – spent media from sandblasting. Approximately 2 tons of sandblast sand will be disposed of per year. The waste will be deposited on a semi-annual basis.

All of these materials have been tested by a laboratory that follows EPA quality assurance and quality control procedures. The materials were tested for a number of known contaminants and hazardous materials. No hazardous materials were identified during the laboratory testing.

The materials listed above shall be sampled at least annually to verify that the characteristics of the materials have not changed. If any change in the material is noted, the level of hazard of the material will be determined and if the material is deemed hazardous or is unacceptable based on 20.9.8 of the Solid Waste Rules, the material will not be accepted at the Red Rocks Regional Landfill.

Disposition Procedures

The materials to be disposed of at the Red Rocks Regional Landfill will be delivered to the site by a registered hauler. The landfill staff will be notified by the truck dispatcher when a load of the special waste will be collected from the Western Refinery and delivered to the landfill. The material will be unloaded at one end of the working face and down wind of the face. Once the material is unloaded, it will be immediately covered. The Petroleum Contaminated Soils will be deposited in the Petroleum Contaminated Soil treatment area as described in the Petroleum Contaminated Soil Disposal Management Plan.

The disposal location of the material will be noted on the day the material is placed in the landfill. An X, Y, and Z coordinate will be determined for the location of the material utilizing a GPS locator. In addition, the cell where the material is deposited will be noted. All of this information will be placed in the operation log for the landfill.

Notification Process

If a material brought to the site is determined to be unacceptable for disposal the New Mexico Environment Department Solid Waste Bureau's district office will be notified immediately. The material location will be identified and additional disposal in that area will be suspended.

Information on the laboratory or other testing results will be sent to the New Mexico Environment Department Solid Waste Bureau's district office for their review and use. All additional shipments of the material to the landfill will be halted and the material at the refinery will be tested to determine if the tests were an anomaly or if the material's characteristics have changed.

The landfill staff will await direction from the New Mexico Environment Department Solid Waste Bureau's district office before any actions are taken

regarding the material. Procedures for addressing the problem will be developed in a joint effort between the landfill operation staff and the New Mexico Environment Department Solid Waste Bureau's district office.

Tracking System

The tracking of the waste will be a combined effort of the generator, hauler, and landfill operation staffs. All three groups will track the waste through manifests as well as through landfill operation logs. The location where any of the waste is deposited will be recorded and noted on the site fill maps. A separate report will be prepared annually for submittal to the New Mexico Environment Department Solid Waste Bureau's office. This report will provide information on how much of each of the four substances were collected from the refinery, the vehicle utilized to haul each load, the day when the material was delivered to the landfill, the amount of material accepted by the landfill, the location where the material was deposited, the cell where the material was deposited, and the date the material was deposited. It is anticipated that less than 1,000 tons of the material from the refinery will be delivered to the landfill in any given year.

A tracking manifest similar to the manifest described in Section 20.9.8.19 of the New Mexico Solid Waste Rules will be utilized to track these materials.

PETROLEUM CONTAMINATED SOILS

Disposal Management Plan for Red Rocks Regional Landfill, Thoreau, New Mexico

The Red Rocks Regional Landfill has been approved to accept Petroleum Contaminated Soils. This Disposal Management Plan addresses the process the operators at the landfill will follow to ensure the proper remediation of the soil.

Delivery of Waste to the Landfill

The generator of petroleum contaminated soil shall assure that all petroleum contaminated soils brought to the Red Rocks Regional Landfill are tested for total petroleum hydrocarbons (TPH) and other contaminants including petroleum derivatives such as motor oils or other hydrocarbon wastes.

The generator must verify the contaminated soil has been sampled a minimum of once for every 100 cubic yards of contaminated soil. There is no exception to this rule. Copies of the results from the laboratory analyses shall be given to the scale house attendant and the attendant will place these results in the landfill's operating record. In addition to test results the scale house attendant will also note in the landfill log the amount of material received, when it was received, the hauler, the generator, and the vehicle utilized to bring the contaminated soil to the site.

Petroleum Contaminated Soils will be classified into two categories based on the analysis of the results of the testing that accompanies the load. Category One is Petroleum Contaminated Soils that may be disposed of immediately and Category Two is Petroleum Contaminated Soils that must be remediated before disposal. Petroleum Contaminated Soils that have a sum of Benzene, Toulene, Ethylbenzene, and Xylene concentrations under 500 mg/kg and Benzene individually under 10 mg/kg and Total Petroleum Hydrocarbon concentration under 1,000 mg/kg may be disposed of immediately. This criteria will be adjusted should the regulatory requirements change. Petroleum contaminated soils containing free liquid shall not be accepted at the Red Rocks Landfill. If there is any doubt as to the consistency of the material a paint filter liquids test shall be performed on the soil. The test results shall be placed in the landfill's daily operating record. If the material fails any required tests the material will not be accepted and the operator will notify the New Mexico Environment Department (NMED) of the unacceptable waste. The operator will contact NMED by telephone utilizing the telephone numbers listed in the Contingency Plan (Exhibit 3 of this permit application).

Petroleum contaminated soil that is above the criteria described in the previous paragraph will be taken to the designated area for remediation. This area will be located on portions of the top of Cells 1 through 8 that have received intermediate cover but not final cover and those portions of Cells 9 through 26 that have received intermediate cover, have at least 20 feet of solid waste placed in the cell, and that are separated from the active portion of the cell, and will vary in location depending on the amount of petroleum contaminated soil which is being remediated and what other actives may be occurring. The limits of the petroleum contaminated soil will be indicated with a two foot berm around the limits of the remediation area. The berm will be utilized to control storm water runoff.

The flow of Petroleum Contaminated Soil into the Red Rocks Regional Landfill has been very sporadic. Many years little if any Petroleum Contaminate Soil is brought to the facility while other years over 1,000 cubic yards may be brought to the site. Based on this limited information it is anticipated that an average of 1,000 cubic yards of Petroleum Contaminate Soil will be brought to the site each year.

Spill Procedures

If the petroleum contaminated soil is spilled the spill area will be isolated with traffic cones or similar barriers. The landfill's scraper will be brought to the spill area and the soil will be picked up by the scraper and taken to the treatment location. The scraper will over excavate the spill area by a minimum of six inches to ensure all of the contaminated soil is captured.

Treatment Location

The petroleum contaminated soils will be treated on the portions of the top of Cells 1 through 8 that have received intermediate cover but not final cover and those portions of Cells 9 through 26 that have received intermediate cover, have at least 20 feet of solid waste placed in the cell, and that are separated from the active portion of the cell. The treatment area will be expanded or decreased in size depending on the amount of soil brought to the site and the length of time required to treat the soil.

Remediation Process

The petroleum contaminated soil will be remediated as follows:

1. The petroleum contaminated soil will be taken to the treatment area as described above. The soil will be segregated based on the soil generated. The limits of the treatment area needed for the soil will be bermed to control storm water runoff. Lathes of at least four feet in

length will be utilized to identify the corners of the treatment area for each different soil brought to the site. The type of petroleum product that is contaminating the soil will be written on the lathe as will the tracking number of the soil. The center of each treatment area will be located utilizing a GPS device.

2. Soil will be spread to a depth of one foot.

3. Soil shall be placed loose to allow for as much air to interact with the soil as possible.

4. During warm months, ambient temperature is a minimum of 40 degrees Fahrenheit during any 24-hour period, the soil shall be turned at least once every week. This shall continue for one month. At the end of the first month the soil will be sampled to determine if:

   a. the sum of benzene, toluene, ethylbenzene, and xylene isomer concentrations is less than 500 mg/Kg, with benzene individually less than 10 mg/Kg; and

   b. the TPH concentration is less than 1,000 mg/Kg.

5. If the soil meets these criteria the soil will be utilized for daily cover only. The soil will be stockpiled on portions of the top of Cells 1 through 8 that have received intermediate cover but not final cover and those portions of Cells 9 through 26 that have received intermediate cover, have at least 20 feet of solid waste placed in the cell, and that are separated from the active portion of the cell until it is needed for daily cover.

6. If the soil does not meet the criteria the remediation process will continue for an additional month when the material will be tested again. If the soil fails after the second month the soil will be turned twice weekly and the sampling will occur again in two weeks time.

7. When the temperature does not meet the criteria described in Step 3 than the soil will not be turned and will be allowed to remain inactive until such time as the temperature consistently meets the requirement described in Step 3.

Once the soil is remediated the operator shall provide a written report to the department documenting remediation and where the remediated soil was utilized at the site.

Northwest New Mexico Regional Solid Waste Authority

Sludge Waste Disposal Management Plan

Introduction

The Northwest New Mexico Regional Solid Waste Authority (NWNMSWA) wishes to accept sludge from the cities of Grants and Gallup. At present the City of Gallup land applies its sludge and the City of Grants utilizes a lagoon system that does not generate sludge. The sludge will be delivered to the Red Rocks Regional Landfill for final disposal. The sludge may be utilized as a soil amendment for the final cover or disposed of within the active landfill. Sheet 2, Volume 5 of this application provides the location of the landfill cells. This plan addresses Section 20.9.8.16, Sludge, of Part 8, Special Waste Requirements, of the New Mexico Solid Waste Rules dated August 2, 2008.

Methods to Identify Special Waste

The sludge generated at the Gallup Wastewater Treatment plant is tested on a regular basis. As noted previously, the Grants Wastewater Treatment plant does not presently generate sludge so no tests are available from this facility. As required in Subsection D of Section 20.9.8.16 no free liquids will be included with any sludge brought to the site and the sludge will be tested for all of the constituents listed in this subsection.

Disposition Procedures

The sludge to be disposed of at the Red Rocks Regional Landfill will be delivered to the site by a registered hauler. The landfill staff will be notified by the truck dispatcher when a load of the sludge will be delivered to the landfill. The sludge will be unloaded at one end of the working face and down wind of the face. Once the sludge is unloaded, it will be immediately covered.

The disposal location of the sludge will be noted on the day the sludge is placed in the landfill. An X, Y, and Z coordinate will be determined for the location of the sludge. In addition, the cell where the sludge is deposited will be noted. All of this information will be placed in the operation log for the landfill.

Sludge Information

In order to ensure the sludge accepted by the Red Rocks Regional Landfill meets regulatory requirements all parts of Section 20.9.8.16 of the Solid Waste Rules will be met. This includes:

1. The sludge will be tested for all of the parameters listed in 20.9.8.16 (D). Once the results of the laboratory tests on the sample are complete and the test results indicate that none of the parameters of 20.9.8.16 (D) have been exceeded the sludge will be brought to the landfill.

2. The sludge will contain no free liquids. The paint filter test, USEPA Test Method 9095, will be utilized to determine if the sludge is liquid free.

3. The sludge will be sampled at the wastewater treatment plant. The samples will be collected per the New Mexico Wastewater Laboratory Certification Study Guide. This guide has been developed by the Surface Water Quality Bureau of the New Mexico Environment Department.

4. The sludge sample will be properly packaged as described in the New Mexico Wastewater Laboratory Certification Study Guide and sent to a certified laboratory.

5. The laboratory that has been identified for conducting the analysis of sludge samples in Interlab. Interlab is utilized by the City of Gallup,

New Mexico and is certified by the New Mexico Environment Department. Based upon our understanding of this certification process Interlab follows quality assurance and quality control procedures in accordance with U.S. EPA approved methods.

The City of Gallup generates approximately 680 tons of sludge annually. Although the City of Grants does not have figures on the amount of sludge generated because its treatment process is designed to not generate sludge we have estimated, based on the amount of sludge generated by the Gallup wastewater treatment plant and multiplying this quantity of sludge by the ratio of the population of Gallup to the population of Grants, that the amount of sludge from Grants could be 370 tons per year. The sludge transport route will be by Interstate 40 to the Thoreau Exit (Exit 53). The transport truck would exit the interstate and transport the sludge by State Highway 371 to the entrance road to the landfill.

At the present time neither city intends to send sludge to the landfill. This plan is prepared to allow for the option by either community to send sludge to the landfill should the need for this disposal option arise. When either community decides to utilize this disposal option sludge testing will be conducted initially prior to any sludge being brought to the site. Once sludge deliveries commence the initial sampling and testing program will require sampling and testing for every load. If the results of the laboratory testing confirm the sludge does not exceed any of the parameter limits presented in 20.9.8.16 (D) then testing will be reduced to a minimum of every 100 cubic yards of sludge. As the sludge continues to meet the requirements and it can be shown the sludge is homogeneous, the sampling and testing will continue to be reduced to a minimum of once a year.

At present, given the amount of sludge anticipated, and the amount of area requiring final cover, Cells 1 through 8, the sludge may be utilized as a soil amendment for the final cover. The amendment process will be conducted on top of Cells 1 through 8 away from other landfill activities and controlled to eliminate

public access. Again, use of the sludge will be dependent on if, and when, any sludge is brought to the site. If the sludge is only brought intermittently it will be disposed of when it is brought to the site. This disposal will include covering with a minimum of 6 inches of soil on the same day it is placed. Further, the sludge will be placed on the edge of the working face away from all other disposal activities. All activities relating to the use of the sludge as a soil amendment or disposing of the sludge will be conducted to meet all 40 CFR Part 503.

Tracking System

The tracking of the waste will be a combined effort of the city hauling and the NWNMSWA landfill operation staffs. Both groups will track the waste through manifests as well as through landfill operation logs. The location where any of the waste is deposited will be recorded and noted on the site fill maps. A separate report will be prepared annually for submittal to the New Mexico Environment Department Solid Waste Bureau's district office. This report will provide information on how much sludge was collected from each city, the vehicle utilized to haul each load, the day when the sludge was delivered to the landfill, the amount of sludge accepted by the landfill, the location where the sludge was deposited, the cell where the sludge was deposited, and the date the sludge was deposited.

Notification Process

If a material brought to the site is determined to be unacceptable for disposal the New Mexico Environment Department Solid Waste Bureau's district office will be notified immediately. The material location will be identified and additional disposal in that area will be suspended. The landfill staff will await direction from the New Mexico Environment Department Solid Waste Bureau's district office before any actions are taken regarding the material. Procedures for addressing the problem will be developed in a joint effort between the landfill operation staff and the New Mexico Environment Department Solid Waste Bureau's district office.