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**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

**1994**

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K. W. Brown Environmental Services  
A Division of AMEC Environmental Services, Inc.  
501 Graham Road, College Station, TX 77845  
Telephone: (409) 690-9380, Fax: (409) 690-7310

December 30, 1994

Mr. Jim Townsend  
Navajo Refining Company  
501 East Main Street  
P.O. Drawer 159  
Artesia, New Mexico 88210

RE: Navajo (Beeson Station) - Loco Hills - New Mexico

Dear Mr. Townsend:

On December 19 and 20, 1994, K. W. Brown Environmental Services (KWBES) performed an assessment of the excavation and stockpile soils at Navajo's Beeson Station. The assessment consisted of visual inspection of the open excavation and advancement of several exploratory borings in the immediate vicinity of the spill. In addition, composite samples were collected from the stockpile soils in accordance with the procedures discussed with personnel from the Artesia office of the New Mexico Oil Conservation Division (OCD). The sampling techniques and constituent analysis also incorporated the procedures outlined in OCD's "Guidelines For Remediation Of Leaks, Spills, and Releases", August 13, 1993. This letter is intended to provide an update regarding the classification of the impacted soils at the referenced property.

The spill resulted in the release of crude oil to the near surface soils. The majority of these soils (estimated to be approximately 1,000 cubic yards) were excavated and placed on polyethylene sheeting within the bermed area near the spill. These impacted soils were subsequently evaluated for RCRA toxicity characterization leaching procedure (TCLP) analysis for volatiles, metals, and reactivity, corrosivity and ignitability (RCI) to determine if the impacted soils were characteristically hazardous. Two composite samples designated as BEE 9 and 10 were obtained from the stockpile and submitted to the laboratory for classification purposes. These two samples were subsequently composited in the laboratory to obtain a representative sample for analysis. The results of the analysis are presented in Table 1.

The results of these analysis indicate that the impacted soils are not characteristically hazardous and may be remediated in accordance with the referenced OCD guidelines. A formal assessment report will be submitted to Navajo Refining by January 13, 1995. The report will further document sampling procedures/analytical methodology, delineate the extent of contamination that may be attributed to the spill, discuss action levels, potential receptors, and recommended remedial technology.



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Table 1. Analytical results for composite sample of BEE 9 and 10.

Analyte	Concentration (mg/L)	Detection Limit (mg/L)	Regulatory Limit (mg/L)
Benzene	ND	0.005	0.5
Carbon tetrachloride	ND	0.005	0.5
Chlorobenzene	ND	0.005	100
Chloroform	ND	0.005	6.0
1,2 - Dichloroethane	ND	0.005	0.5
1,1 - Dichloroethylene	ND	0.005	0.7
Methyl ethyl ketone	ND	0.010	200
Tetrachloroethylene	ND	0.005	0.7
Trichloroethylene	ND	0.005	0.5
Vinyl chloride	ND	0.005	0.2
Arsenic	ND	0.2	5.0
Barium	1.7	0.5	100
Cadmium	ND	0.05	1.0
Chromium	ND	0.05	5.0
Lead	ND	0.2	5.0
Mercury	ND	0.002	0.2
Selenium	ND	0.2	1.0
Silver	ND	0.1	5.0
Reactivity - Cyanide	ND	50	250
Reactivity - Sulfide	ND	50	500
pH (s.u.)	7.6		2.0 < pH < 12.5
Flash Point (F)	>140		must exceed 140

If you have any questions concerning this matter, please contact me at our College Station office. (409) 690-9280.

Respectfully,

*W. R. Cullen*

W. R. Cullen, Jr., P.E.  
Engineering Group Manager

WRC:dr  
File: 622094004-110  
via US Mail