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January 30, 2009

New Mexico Environmental Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

Dear Hope Monzeglio,

This letter is in response to your emails dated January 15, 2009 and January 21, 2009 requesting additional information. NMED reviewed Gallup's January 12, 2009 letter which responded to NMED's December 19, 2008 letter. In the January 15, 2009 email NMED requested additional information identified below.

1. Item (e) of NMED's December 19, 2008 letter stated "[s]ubmit monthly flow rates into the new API separator and into the third benzene stripper to NMED on the seventh day of each month. If the seventh day falls on a weekend, then the data must be submitted on the next business day. This must begin January 1, 2009." Gallup responded stating that "[f]low into the new API separator and to the third benzene stripper is not currently monitored."

NMED responded in the January 15, 2009 email stating "Since the flow rate into the new API separator (NAPI) is not monitored; NMED is assuming flow rates are monitored leaving the NAPI. If this is the case, Gallup must provide NMED with monthly flow rates leaving the NAPI and adhere to the same reporting requirements in item (e) of the December 19, 2008 letter. If any of this information is estimated, the information must still be submitted but include how the estimates are derived. Pertaining to the third benzene stripper: Gallup must have some idea or estimate of flow into or out of the third benzene stripper. Therefore, Gallup must submit any estimates of flow into or out of the third benzene stripper and provide how the estimates are derived. This must also be submitted on a monthly basis in accordance with item (e) of NMED's 12/19/08 letter."

The total outflow of the API Separator is measured by taking the outflow from the benzene strippers 1 & 2 (flume depth readings are taken approximately six times in a 24-hour period) plus the overflow into our temporary Baker tank (if any). Gallup will provide these data on the 7th of each month for the previous month starting from January 1, 2009 as requested.

Regarding the third benzene stripper flow, the refinery does have estimates of the likely flows from all major sources into Benzene Stripper 3 and Gallup will provide these on the 7th of each month for the previous month starting from January 1, 2009 as requested.

2. NMED also stated in the January 15, 2009 email "From a brief review of Gallup's air quality permits; volatile organic compounds (VOCs) and benzene, toluene, ethyl benzene, xylenes (BTEX) emissions emitted from the benzene strippers are calculated monthly and/or quarterly. Gallup must submit to NMED all VOC and BTEX emissions data and calculations pertaining to benzene strippers one and two, and three for the past year (2008). The information must include how the emission data is calculated."

Attached is the 2008 emission calculation. The calculations are based on the following requirements from NSR Permit No. 0633M7. Condition 3.s. reads "Once per calendar month, the permittee shall monitor the BTEX concentration in the pipe feeding the benzene stripper and discharging from the benzene stripper using Method 8260B." Condition 4.p. reads "Monthly, the permittee shall calculate the amount of BTEX that is emitted monthly and the 12 month rolling BTEX emission rate (TPY) from the benzene stripper using the data collected in Specific Condition 3." Condition 3.r. reads "Once per calendar quarter, the permittee shall measure the total VOC emissions from the benzene strippers or shall measure the total VOC concentration in the pipe feeding the benzene strippers and discharging from the benzene strippers using a method that tests, at a minimum, total VOCs." Condition 4.q. reads "Quarterly, the permittee shall calculate the amount of VOC emitted during the quarter, and the quarterly rolling 4 -quarter (annual) VOC emissions (TPY) from the benzene stripper and the API oil water separator using the data collected in Specific Condition 3."

3. In the January 21, 2009 email NMED requested additional information from the meeting with Western Refining, OCD and NMED in Santa Fe the morning of January 21, 2009 to discuss the design of the new above ground wastewater treatment system as shown below:

- 1) If Gallup were to remove the third benzene stripper from service, would the wastewater treatment system (WWTS) design be changed at all or could the presented WWTS be able to handle the increased benzene levels?

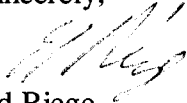
The design as presented only took into account the shutdown of benzene strippers 1 and 2. Additional modifications would be necessary if the third stripper was required to be taken out of service.

- 2) This may have been covered in the meeting; what will be the flow rate from the Travel Center into the wastewater treatment system?

The flow rate from the Travel Center is usually about 20 gpm; our contract with the Travel Center allows for sanitary wastewater up to a maximum of approximately 50 gpm.

Please contact me if further clarification is required.

Sincerely,



Ed Riege  
Environmental Manager

**Western Refining Gallup**  
**Air Quality Permit 0633M7 Condtion 3s, 4p and 3r**

**Compliance Determination Method For VOC Emission Limits**  
**MONTHLY SAMPLING BTEX**

Month	ppb benzene		ppb benzene		ppb benzene		ppb toluene		ppb toluene		ppb toluene		ppb ethylbenzene		ppb ethylbenzene		ppb ethylbenzene		ppb xylene		ppb xylene		ppb xylene		ppb total BTEX		A mass fraction	Gallons (G) TOTAL FLOW/month	B TONS/month	tons BTEX Mass A X B	tons BTEX Mass all strippers	TPY BTEX Mass 12 months rolling	ppb total Benzene
	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet	Z84-V7 inlet	Z84-V7 outlet							
Feb-08	35000	9100	25900	36000	24000	12000	2500	3100	-600	11000	13000	0	37300	0.0000373	970,000	3671.7	0.1															25900	
Mar-08	7200	1200	6000	9300	1600	7700	660	230	430	6700	1400	5300	19430	0.00001943	3,880,006	14687.0	0.3	0.4	0.8												6000		
Apr-08	25000	520	24480	24000	1400	22600	2500	410	2090	12000	1900	10100	59270	0.00005927	952,500	3605.5	0.2														24480		
May-08	6400	630	5770	9700	1600	8100	1200	400	800	6800	2500	4300	18970	0.00001897	3,810,000	14422.0	0.3	0.5	0.91												5770		
Jun-08	29000	1500	27500	32000	910	31090	1800	0	1800	10000	220	9780	70170	0.00007017	1,460,000	5526.5	0.4														27500		
Jul-08	9100	2000	7100	21000	5900	15100	2000	870	1130	12000	5200	6800	30130	0.00003013	5,840,000	22106.2	0.1	0.5	1.36												7100		
Aug-08	28000	150	27850	25000	110	24890	1500	9.2	1490.8	7600	53	7547	61777.8	6.17778E-05	2,137,500	8091.1	0.5														27850		
Sep-08	6100	2100	4000	12000	4700	7300	950	460	490	4800	2500	2300	14090	0.00001409	8,550,000	32364.3	0.5	1.0	2.32												4000		
Oct-08	29000	1900	27100	28000	1400	26600	1500	84	1416	8000	530	7470	62586	0.000062586	1,534,500	5808.5	0.4														27100		
Nov-08	15000	1600	13400	22000	4300	17700	1700	670	1030	9000	3500	5500	37630	0.00003763	6,138,000	23234.2	0.9	1.2	3.56												13400		
Dec-08	22000	1100	20900	25000	1900	23100	2200	220	1980	14000	1800	12200	58180	0.00005818	1,449,750	5487.7	0.3														20900		
Jan-09	3700	2200	1500	9100	3400	5700	1100	210	890	6800	1400	5400	13490	0.00001349	5,799,000	21951.0	0.3	0.6	4.17												1500		
Feb-09	23750	2100	21650	30000	2200	27800	2100	200	1900	14000	1400	12600	63950	0.00006395	1,400,500	5301.3	0.3														21650		
Mar-09	8675	591	8084	28000	910	27090	1500	53	1447	9300	280	9020	45641	0.000045641	5,602,000	21205.3	1.0	1.3	5.48												8084		
Apr-09	28000	20000	8000	27000	18000	9000	2100	1400	700	12000	8100	3900	21600	0.0000216	1,719,000	6506.9	0.1														8000		
May-09	10000	950	9050	14000	1400	12600	970	130	840	5200	740	4460	26950	0.00002695	6,876,000	26027.7	0.7	0.8	6.32												9050		
Jun-09	39000	10455	28545	24000	9350	14650	1400	780	620	8700	4650	4050	47865	0.000047865	1,837,500	6955.5	0.3														28545		
Jul-09	9700	1275	8425	14000	1800	12200	1185	200	985	6950	1220	5730	27340	0.00002734	7,350,000	27822.0	0.8	1.1	7.42												8425		
Aug-09	50000	910	49090	21000	700	20300	780	160	620	5400	1200	4200	74210	0.00007421	1,440,850	5454.0	0.4														49090		
Sep-09	9400	1600	7800	14000	2200	11800	1400	270	1130	8700	1700	7000	27730	0.00002773	5,763,400	21816.2	0.6	1.0	8.43												7800		
Oct-09	67000	380	66620	19000	240	18760	440	21	419	3000	170	2830	88629	0.000088629	1,440,850	5454.0	0.5														66620		
Nov-09	5200	1500	3700	12000	3500	8500	1100	380	720	5200	1900	3300	16220	0.00001622	5,763,400	21816.2	0.4	0.8	9.26												3700		

**QUARTERLY SAMPLING TOTAL VOC**

Quarter	Z84-V7 inlet			Z84-V7 outlet			Z84-V7 emitted			1st QTR 08	Stripper VOC (tons)	Total VOC ppb	A	Gallons (G)	B	tons VOC Mass	tons VOC Mass	TPY	ppb
	inlet	outlet	emitted	inlet	outlet	emitted	inlet	outlet	emitted										
1st QTR 08	86750	50882	35868	36368	6312	30056	5.87	35868	0.000035868	3,382,502	12803.8	0.46							
2nd QTR 08	63020	1002.2	62017.8	37190	23614	13576	5.87	62017.8	6.20178E-05	20,528,000	77704.6	4.82							
3rd QTR 08	120100	37070	83030	135790	11069	124721	14.37	83030	0.00008303	18,277,000	69183.9	5.74							
4th QTR 08	96290	2429	93861	29070	11952	17118	7.93	93861	0.000093861	18,876,800	71454.4	6.71							
1st QTR 09	29070	11952	17118				7.93	17118	0.000017118	18,876,800	71454.4	1.22							

**API OIL WATER SEPARATOR Z84-T5**

**Z84-T5**  
**Flow (gal)**

1st QTR 08	3,382,502
2nd QTR 08	20,528,000
3rd QTR 08	18,277,000
4th QTR 08	18,876,800

Quarter	Strippers V1-2, 7 TPY		Total	
	VOC Mass	12 months rolling	VOC Mass	12 months rolling
1st QTR 08	0.84		0.84	
2nd QTR 08	6.72		6.72	
3rd QTR 08	21.09		21.09	
4th QTR 08	29.02		29.02	

NOTE: We had anomalously high BTEX levels for Stripper 1 & 2 (Z-84-V1-2) and 3 (Z-84-V7) for October. These were not physically possible as the output of Stripper 3 becomes a part of the inflow of Strippers 1 and 2, and the data did not match. Therefore, we used an average of the September and November results for the month of October.