

**VanHorn, Kristen, NMENV**

**From:** Larsen, Thurman <Thurman.Larsen@wnr.com>  
**Sent:** Thursday, November 08, 2012 8:30 AM  
**To:** VanHorn, Kristen, NMENV; Chavez, Carl J, EMNRD; Cobrain, Dave, NMENV  
**Cc:** Riege, Ed; Johnson, Cheryl; Morgan, Loretta; Dorsey, Alvin; Tso, Janice  
**Subject:** OCTOBER 2012 MONTHLY PROGRESS REPORT  
**Attachments:** 1210729.pdf; 1210A03.pdf; 1210C02.pdf; 1210C88.pdf; 1210158.pdf; 1210467.pdf; 1210652.pdf; 1210C84.pdf; 1210A02 W CASE NARATIVE.pdf; 1210158.pdf; 1210729.pdf; OCTOBER 2012 REPORT DATA SHEETS.pdf

Dear Kristen,

The following is the monthly Progress Report for October 2012. Attached are all laboratory results from Hall laboratories for October 2012 sampling events to date and the benzene stripper / MPPE sheets for your review. Please note that the some analytical data is still pending for October 27<sup>th</sup> through 30<sup>th</sup>. Please note that on or about October 10<sup>th</sup> -15<sup>th</sup>, 2012, Western Refining (Gallup Refinery) completed the 2012 Turnaround and all units are online and operational at the time of this report.

The monthly flow data for October 2012 through the (N-S) Benzene Strippers to AL-1 is estimated in summary as follows: The flows through the north and south strippers are based on operational data.

	N-Stripper (gpm)	S-Stripper (gpm)	Total Flow (gpm)
<b>Average (gpm)</b>	20.2	41.3	61.5
<b>Maximum (gpm)</b>	35.0	71.7	106.7
<b>Minimum (gpm)</b>	4.1	8.3	12.4

The monthly flow data for September 2012 from AL-2 to EP-1 is summarized as follows:

	Weir Height (in)	Flow Rate (gpm)	Flow Volume (gpd)
<b>Average</b>	7.1	188.3	271215
<b>Maximum</b>	9.1	340.0	489598
<b>Minimum</b>	5.0	72.5	104358

The monthly flow data for September 2012 of the API Influent, API Effluent, MPPE Effluent to STP-1 is summarized as follows:

	API Influent (gpm)	API Effluent (gpm)	MPPE Effluent (gpm) to
<b>STP-1</b>			
<b>Average (gpm)</b>	175.33	170.27	178.62
<b>Maximum (gpm)</b>	268.19	271.56	271.56
<b>Minimum (gpm)</b>	41.39	55.83	55.83

**Benzene Strippers:** The North and South strippers were used as a combined total of approximately 120 hour during the month with approximately 10 percent average slipstream flow from the API Effluent/MPPE-DGF Influent. The benzene strippers were operated as a slip stream configuration, or not in operation. The stripper usage decreased from the previous month due to an increase in reliability of the MPPE Unit.

The MPPE Unit was in operation for 21 days; of which, 2 days were routed through the strippers, and 6 days were slipstreaming the MPPE Unit with the strippers. The flow through the MPPE was slip streamed on an average of 30 - 40 percent average of the API Effluent/MPPE-DGF Influent flow rate going directly through the benzene strippers. The flow was diverted directly through the strippers about 48 hours and slip streamed for about 192 hours during October. The flow rates incorporate both the flow going though the strippers when the MPPE is diverted and the slip stream flow

from the MPPE-DGF Unit. Please note that a volumetric flow analysis will not balance due to an estimation of the slip stream flow operation.

**MPPE UNIT:**

The initial startup of the MPPE Unit occurred on May 8, 2012 at 1500 hrs. Sampling is conducted on a daily basis in accordance with NMED letter of May 24, 2012 (Comment 17). The Agency prescribes the methodology and sampling requirements necessary to fulfill this obligation.

The MPPE Unit was in full operation during the month of October for a total of 504 hours, plus 192 hours where slipstreamed through the strippers were necessary. The MPPE Unit operated solely from October 1<sup>st</sup> -19<sup>th</sup>, 23<sup>rd</sup> and 25<sup>th</sup>. (21 days) The MPPE Unit was slipstreamed on October 20<sup>th</sup> -22<sup>nd</sup>, 27<sup>th</sup> -31<sup>st</sup> on eight (8) separate occasions. The MPPE Unit was shut down on October 24<sup>th</sup> and October 28<sup>th</sup> for maintenance issues. (2 days)

**SAMPLING:**

Samples were collected during the month of October for wastewater flowing directly through the MPPE Unit to STP-1, slip stream diversionary flow through the strippers, or flow through the strippers only as required.

On October 21<sup>st</sup> and 22<sup>nd</sup>, the MPPE Unit was slipstreamed to the benzene stripper. Samples were collected for both the MPPE Unit and the strippers in accordance with all requirements. According to the Hall Environmental Laboratory Report (# 1210A03) from October 21<sup>st</sup> and 22<sup>nd</sup>, the analysis indicated that the samples were collected before the strippers (**Bz 1-2 IN**) and **not after** the stripper (**Bz 1-2 OUT**) as determine from previous stripper inlet samples collected. The October 21<sup>st</sup> and 22<sup>nd</sup> samples were discarded. However, our internal laboratory results for the stripper from this time frame indicated a results of .09 to .19 ppm which is below the Regulatory Threshold Limit of 0.5 ppm.

Missing MPPE analysis for the September report may be found in the Hall Report (# 1210158). MPPE Analysis for October 29<sup>th</sup> through October 31<sup>st</sup> is still pending.

If you should have and questions or concerns, please contact me via my office phone (505) 722-0258 or via my cell at (505) 862-1749.

Sincerely,  
Beck Larsen  
Environmental Engineer  
Western Refining (Gallup Refinery)