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AUG 11 2014

August 8, 2014

NMED
Hazardous Waste Bureau

Mr. John E. Kieling, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, New Mexico 87505-6303

RE: DISAPPROVAL, 2011 FACILITY WIDE GROUNDWATER MONITORING REPORT
AND 2012 FACILITY WIDE GROUNDWATER MONITORING REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-12-003 and HWB-WRG-13-003

Dear Mr. Kieling:

This letter was prepared pursuant to your letter dated May 12, 2014, specifically regarding comment 14 below.

NMED Comment 14

Section 6.3.4 (Leak Detection Units (LDU): East LDU, West LDU, Oil Sump LDU). In Section 7.2 (West Side Ground Water Monitoring) the permittee states, "[a]lso located at the NAPIS are three leak detection units which are inspected and if fluids are detected, samples are collected on a quarterly basis. All three leak detection units continue to have a fluid level." The paragraph goes on, "[q]uarterly analysis of fluid collected from these units and the continued presence of fluid indicate the potential that the fluid may be coming from the NAPIS." The permittee addressed this issue in a letter to NMED dated August 5, 2013 and are using a vacuum truck to remove water which is still present in the LDUs. The permittee must repair the leaks in the NAPIS unit within 90 days of receipt of this letter.

Response

The west bay was repaired with a plate installation in June. The bay was hydro-tested with florescent dye and no leaks were observed. The west LDU and Oil sump LDU were checked and showed no signs of leakage. The west bay was placed back into service on July 8, 2014. The west LDU and oil sump LDU were again checked on August 6, 2014 and continue to show no signs of leakage.

The east bay was taken out of service on July 22, 2014. Cleaning and repair of this unit are underway which could take another couple weeks. After repairs are made, the east bay will be hydro-tested and the east LDU checked to assure there are no leaks before placing this bay back into service.

If there are any questions regarding this response, please contact Mr. Ed Riege at (505) 722-0217.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely, *JR McDONOR for Billy McClain*

Mr. Billy McClain
Refinery Manager
Western Refining Southwest, Inc. – Gallup Refinery

cc D. Cobrain NMED HWB email
N. Dhawan, NMED email
K. Van Horn, NMED email
C. Chavez, OCD email