



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov



RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 15, 2015

Mr. Ed Riege
Environmental Manager
Western Refining, Southwest Inc., Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

**RE: DISAPPROVAL
OW-14 SOURCE AREA INVESTIGATION WORK PLAN
OW SERIES WELLS AND CONTAMINANT PLUME MIGRATION
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-15-005**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) has reviewed Western Refining Southwest Inc., Gallup Refinery's (Permittee) *OW-14 Source Area Investigation Work Plan OW Series Wells and Contaminant Plume Migration* (Work Plan), dated September 2015, and hereby issues this Disapproval. The Permittee must address the following comments before NMED can complete its review of the Work Plan. NMED is available to discuss potential investigative options prior to submittal of the revised Work Plan.

Comment 1

The Permittee submitted the Work Plan as an unbound document. Although there are no formal requirements to bind submittals, NMED prefers submittal of bound documents to facilitate placement and storage in the Hazardous Waste Bureau library.

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Comment 2

Installation of two monitoring wells may not be sufficient to investigate the potential source(s) of contamination as required by NMED's May 11, 2015 letter. Please propose soil boring locations in addition to the installation of two monitoring wells in order to locate the potential source(s) of contamination in groundwater. The Permittee is required to propose an investigation that provides accurate data for the evaluation of site conditions, the nature and extent of contamination, and contaminant migration. The proposed investigation must attempt to define the extent of the contaminant plume in groundwater as well as evaluate soils for potential contamination. Revise the Work Plan to propose additional soil borings (where practicable), near or within the Tank Farm to define the nature and extent of contamination.

The Permittee must address both comments in this Disapproval and submit a revised Work Plan. In addition to the revised Work Plan, please include a red-line strikeout version in electronic format showing where all revisions have been made to the Work Plan. The revised Work Plan must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. The revised Work Plan must be submitted to NMED no later than **April 19, 2016**.

If you have questions regarding this Disapproval, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
K. Van Horn, NMED HWB
C. Chavez, EMNRD OCD
A. Hains, WRG
L. King, EPA

File: Reading File and WRG 2015 File
WRG-15-005