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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 22, 2016

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

**RE: APPROVAL WITH MODIFICATIONS
FACILITY-WIDE GROUND WATER MONITORING
WORK PLAN – 2014 UPDATES FOR 2015
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-15-001**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) has reviewed the revised *Facility-Wide Ground Water Monitoring Work Plan – 2014 Updates for 2015*, dated September 21, 2015 submitted on behalf of Western Refining Southwest Inc., Gallup Refinery (Permittee). The Permittee addressed the issues cited in NMED's March 11, 2016 Rejection and hereby issues this Approval with the following modifications.

Comment 1

A red-line strikeout version of the revised Report was not included with the submittal; however, the Permittee emailed the red-line strikeout when NMED requested it. A red-line strikeout aids in review of revised documents, because it allows the reviewer to quickly review changes rather than review the entire document again. The red-line strikeout version must show where all changes have been made to the submittal including text, tables, and figures. For future submittals, please ensure that all of the components of the documents are included.

Comment 2

Comments regarding Table 1 (Gallup Refinery Groundwater Monitoring Schedule:

- a) Remove the requirement discussed in Comment 10e since neither the Permittee or NMED can resolve where the requirement originated and revise Table 1 in all future submittals;
- b) Table 1 indicates that the water quality parameters are not currently collected at the MKTF wells. Collection of water quality parameters is beneficial to monitor both cleanup and natural attenuation of contaminants. The Permittee must add the collection of water quality parameters to the requirements for the MKTF wells. Revise the table in future submittals to reflect this change; and
- c) NMED Comment 7e stated that “[t]he Permittee requests that groundwater monitoring well SMW-2 sample analyses be reduced to VOCs and WQCC metals. SMW-2 is part of the "sentinel well" system around the closed RCRA Land Treatment Unit. Therefore, the Permittee must continue to sample, as required, at SMW-2 for major cations, anions, VOCs, GRO/DRO-extended, WQCC metals, and cyanide.” NMED inadvertently left off SVOCs which have been required in the past. Revise Table 1 to include the requirement to analyze for SVOCs.

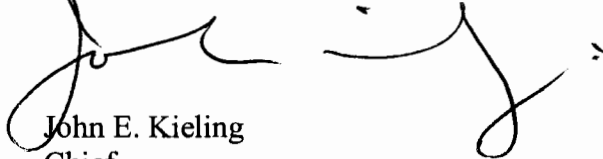
Comment 3

The Permittee added a note to the table in Appendix C-1 (Well Data 2014 Annual/Quarterly Sampling DTB/DTW Measurements) to explain the “0.00” water depth readings for OW-1. The note reads, “if 0.00 is indicated – means water is at top of casing (full)” it would be useful to also add that the well is under artesian conditions. In future submittals that include this table, edit the note to read that the well is under artesian conditions.

Ed Riege
Gallup Refinery
August 22, 2016
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If you have questions regarding this Approval with Modifications, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain NMED HWB
N. Dhawan NMED HWB
K. Van Horn NMED HWB
C. Chavez OCD
A. Hains WRG
C. Johnson WRG
L. King EPA Region 6

File: Reading File and WRG 2016 File
HWB-WRG-15-001