



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

State of New Mexico
ENVIRONMENT DEPARTMENT

ENTERED



Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 2, 2018

Mr. William Bailey
Environmental Supervisor
Western Refining, Southwest Inc., Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

**RE: APPROVAL WITH MODIFICATIONS
HYDROCARBON SEEP INTERIM MEASURES
2017 4TH QUARTER STATUS REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-18-001**

Dear Mr. Bailey:

The New Mexico Environment Department (NMED) has reviewed the *Hydrocarbon Seep Interim Measures 2017 4th Quarter Status Report* (Report), dated January 31, 2018, submitted on behalf of Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

Comment 1

In *Stand Pipes Recovery Records*, the volume of recovered hydrocarbons and water is recorded to an accuracy of one-gallon during the fourth quarter measurements. For example, the volume of recovered hydrocarbons and water for November 9, 2017 is recorded as 24 and 4,976 gallons, respectively. Previously, the measured volumes were recorded to an accuracy of five-gallons. Provide an explanation regarding the variance of the measuring techniques in a response letter.

Comment 2

In the first bullet of the list of activities conducted during fourth quarter 2017, the Permittee states, “[a]pproximately 38,400 gallons of groundwater/hydrocarbon mixture were recovered during the fourth quarter. That represents a reduction from the previous quarter at 59,400 gallons. An estimated volume of 1,145 gallons of SPH was recovered from the retention ditch in comparison to 535 gallons in the third quarter.” Despite the reduction in total fluid recovery, oil recovery volume more than doubled during the fourth quarter compared to the oil recovery volume during the third quarter. Overall, the trend in oil recovery appears to be increasing throughout 2017. A variance in field measurement or collection techniques may have caused the apparent increase in recovered oil. Explain whether there was a variation in measurement or collection techniques. If there are other potential causes for the presence and increase in volume of recovered oil (e.g., spills or releases), then the Permittee must propose to investigate the cause. Provide an explanation in a response letter.

Comment 3

In the second bullet of the list of activities conducted during fourth quarter 2017, the Permittee states, “[a] [camera survey] contract has not yet been secured with the preferred vendor.” In a response letter, describe whether the contracting issue has been resolved. If not, the Permittee must explain the nature of the issues or investigate the availability of alternative vendors. The Permittee must investigate potential on-going leaks and potential sources for releases to the environment through camera surveys as required in a timely manner.

Comment 4

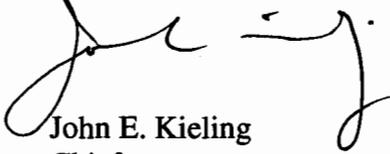
In the third bullet of the list of activities conducted during fourth quarter 2017, the Permittee states, “[a]s the sumps are located beneath the truck loading rack that is constantly in service, any additional testing in this immediate area will require extensive internal coordination.” Dye tracer may be introduced from locations other than the immediate sumps as long as the release origin is directly connected to the sumps. Investigate the possibility of introducing the dye from alternative locations that are more accessible. If the test can be conducted, the Permittee must include a proposal for the dye test in any future 2018 reports. If not, the Permittee must provide a more detailed explanation why the test cannot be conducted from other release location in a response letter. The Permittee must address all potential on-going leaks and potential sources of releases to the environment.

Mr. Bailey
March 2, 2018
Page 3

The Permittee must address all comments in this Approval with Modifications, and submit a response letter, cross-referencing NMED's numbered comments by **September 30, 2018**.

If you have questions regarding this Approval with Modifications, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: K. Van Horn NMED HWB
M. Suzuki NMED HWB
C. Chavez OCD
A. Hains WRG
C. Johnson WRG
L. King EPA Region 6

File: Reading File and WRG 2018 File
HWB-WRG-18-001