



State of New Mexico **ENTERED**
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

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 15, 2018

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

**RE: INFORMATION REQUEST
PETROLEUM RELEASE NEAR STP-1
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-MISC**

Dear Mr. Bailey:

The New Mexico Environment Department (NMED) is in receipt of the Western Refining Southwest, Inc. Gallup (Permittee) initial spill release report regarding a naphtha release that was discovered east of pond STP-1 on February 6, 2018.

The Permittee met its obligation under the Resource Conservation and Recovery Act Permit's (Permit) Section II.C.2.c (24 Hour and Subsequent Reporting) for the 24-hour reporting and written initial spill report requirements. The Permittee called NMED's spill reporting phone line and left a message at 22:33 on Wednesday, February 7, 2018 to report a release of "less than 25 barrels" of naphtha. The Permittee also contacted the New Mexico Energy, Minerals, and Natural Resource Department (EMNRD) Oil Conservation Division (OCD) to report the release. Subsequently, the Permittee emailed an initial spill report to both NMED and OCD with additional details regarding the release.

The Permittee is responsible under Permit Section IV.B.4 (Future Releases) to conduct a response action and submit a response action report within one year of the discovery of the release. Due to the nature of the release and the history of releases, the following information sought by the comments below must be submitted prior to submittal of the Response Action Report. The Permittee may refer to their responses to this Information Request in the Response Action Report.

Additionally, it is highly recommended that the Permittee seek input from both NMED and OCD before proceeding with interim measures or corrective actions to ensure that the Permittee meets the regulatory requirements for both agencies and avoids unnecessary use of resources. Provide responses to the following comments and questions in a letter addressed to both agencies:

Comment 1

The initial spill report states, "a mixture of petroleum product (20%) and water was found releasing out of a 4" diameter PVC pipe that discharges into a stormwater drainage ditch south of STP-1." Provide information to address the following questions:

- 1) Where does the PVC pipe originate?
- 2) Is the PVC pipe connected to other piping? If so, what do the other pipes convey?
- 3) How was the 20:80 ratio of petroleum:water determined?
- 4) Does the PVC pipe usually discharge stormwater? What are the source areas for the stormwater captured (e.g., process area, office, parking lot)?
- 5) If one source is stormwater, is the stormwater sampled?

Comment 2

The Permittee states that, "[i]nvestigations into the source upstream of the discharge point continued into the following day (February 7, 2018). After obtaining some drawings of project work that had taken place near STP-1, site personnel began excavating a suspect area. At approximately 5 feet below substrate hydrocarbon-saturated soil was encountered in the area east of STP-1." Provide information regarding underground lines east of STP-1 and whether any of the underground lines convey naphtha. Provide schematic drawings of the underground piping back to the refinery and tank farms. Describe the distance between the pipe outlet, the suspect area, and underground piping for naphtha, and the location(s) of naphtha storage.

Comment 3

The Permittee also notified NMED of a discovered release on March 27, 2017, where naphtha was seeping out of the ground from a carbon steel pipe, which was the sour naphtha line to Tank 567. It appears that underground piping at the facility may be corroding. Underground pipeline leaks may be contributing to the contaminants in soil and groundwater downgradient from the process and tank areas. NMED recommends that the Permittee coordinate with OCD to conduct Hydrostatic Tests ("HST") of underground pipelines at the facility. Provide NMED with the timeline for the HST after coordinating with OCD.

Comment 4

In the initial spill report, the Permittee states, “[a]t 08:30 pm, it was determined that the catch basins were not preventing any further release to ground. According to the initial calculations, the on-going release is estimated to be >25bbbls shortly after 10am on February 8, 2018.”

Describe whether naphtha reached the ground surface where the catch basins were used to try to capture the release.

Comment 5

The Permittee provided a figure depicting French drains and pipes located in the vicinity of pond STP-1. Provide additional information regarding the following:

- 1) Provide a fully labelled figure depicting all pipes and drain structures in the vicinity of pond STP-1.
- 2) Describe the lines depicted in the figure where there appears to be pipelines located along the highlighted French drain east and south of pond STP-1 and the lines that are connected to the wastewater discharge line from the wastewater treatment system and the pipeline located east of Evaporation Pond 1.
- 3) Discuss whether there is underground piping near STP-1 and the Aeration Basin that would affect excavations in the area.
- 4) Describe the purpose of the 6-inch PVC pipe on the southern end of STP-1 and where it discharges to (the drawing merely shows where it ends).

Comment 6

The Permittee states, “[s]ite personnel continue to monitor the catch basin and utilize a vacuum truck to transfer its contents back into the process.” Describe where the wastewater is being added back into the wastewater treatment system. Because of on-going issues regarding underground piping leaks from the sewer system, the Permittee must ensure that products are not re-introduced at locations that will result in additional releases to the subsurface.

Comment 7

Reminders regarding soil excavations include:

- 1) Waste characterization samples (toxicity characteristic leaching procedure (TCLP)) must be collected from the excavated soil. The number of waste characterization samples must be based on the amount of soils excavated (e.g., one sample per 25 cubic yards of waste, or similar).
- 2) To confirm that contaminated soils were removed, confirmation samples must be collected from the excavation (sidewalls and base of excavation) and analyzed for total volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), metals, gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO). Once soil cleanup is confirmed, then the excavation may be backfilled. If the

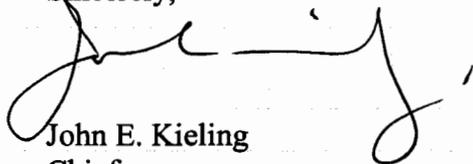
Mr. Bailey
March 15, 2018
Page 4

Permittee removes soils and does not confirm that all contaminants were removed, the Permittee must conduct additional sampling to demonstrate that residual contamination is less than the corresponding screening levels.

The Permittee must address all comments in this letter and submit a response to NMED and OCD by no later than **June 29, 2018**. The response letter must cross-reference the numbered comments in this letter. Please also provide a plan for underground line testing to NMED and OCD for review no later than **November 30, 2018**.

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

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: K. Van Horn NMED HWB
M. Suzuki NMED HWB
C. Chavez OCD
J. O'Brien, Andeavor
L. King EPA Region 6

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