

Andeavor
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Jamestown, NM 87347

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July 16, 2018

Mr. John Kieling
Hazardous Waste Bureau Chief
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313



**RE: DISAPPROVAL
FACILITY-WIDE GROUND WATER MONITORING WORK PLANS –
UPDATES FOR 2016, 2017 AND 2018
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-16-003
HWB-WRG-17-005
HWB-WRG-18-002**

Dear Mr. Kieling:

On June 5, 2018, Western Refining Southwest Inc., Gallup Refinery (Permittee) received comments from New Mexico Environment Department (NMED) and a Disapproval of subject Work Plans. NMED requested the Permittee to address each comment provided by both NMED and the New Mexico Energy Minerals and Natural Resources Department (EMNRD) Oil Conservation Division (OCD). While responses to all comments have been requested to be submitted no later than July 31, 2018, NMED requested documentation addressed in Comment 20 to be submitted by no later than July 16, 2018. Permittee hereby submits this letter and enclosed documentation in response to such request.

Comment 20

In Section 4.1.2, Well Purging, the Permittee states, "[a]ll purged ground water and decontamination water from monitoring wells will be drained into the refinery waste water treatment system upstream of the NAPIS." Although one of the sewer leaks was repaired in October 23, 2013, unidentified sewer leaks were still present in the sewer system according to the results of the September 2013 and May 2016 dye tests. The Permittee must not discharge wastewater into the sewer system upstream of the New American Petroleum Institute Separator (NAPIS) until the Permittee demonstrates that the sewer system has been adequately repaired. In addition, various organic and metal constituent concentrations in the samples collected from the leak detection units (LDU) exceeded their respective standards in 2016 according to the 2016 Report. These results indicate that the NAPIS has on-going leakage; therefore, the source of the leaks must be identified and repaired in the NAPIS. The Permittee must not dispose any investigation-derived waste (IDW) into the refinery sewer system until the issues are resolved. During the May 2, 2018 meeting, the Permittee indicated to NMED and OCD that the NAPIS was repaired; however, no documentation demonstrating the completion of repairs has been officially submitted. The documentation must be submitted to OCD and NMED by no later than July 16, 2018.

Response: As indicated above, Permittee discussed repairs that were recently made to the NAPIS. Attachment A provides work orders that were provided for review during the May 2, 2018 meeting held at the NMED-HWB office in Santa Fe. Permittee requests that NMED accept these work orders as evidence of NAPIS repairs and allow IDW to be disposed of at the Refinery Bundle Pad. Disposing of IDW at this location is directly upstream of the Refinery's Wastewater Tanks 27, 28 and 35 and will flow through aboveground piping to the NAPIS.

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If you have any questions regarding the information herein, please do not hesitate to contact me by telephone at (505) 722-0287 or by email at Jessica.L.Obrien@andeavor.com.

Sincerely,

A handwritten signature in blue ink that reads "Jessica L. O'Brien". The signature is written in a cursive, flowing style.

Jessica L. O'Brien
Acting Environmental Supervisor
Western Refining Southwest, Inc. – Gallup Refinery

Enclosures:

cc: Kristen VanHorn, NMED HWB (via e-mail)
Carl Chavez, OCD (via e-mail)

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Attachment A



WO #: 711256 * 711256-1*
WO Title: Remove the West Bay from service to upgrade to BW
Equipment: Z-84-T5 * Z-84-T5*
Crew: Pipefitter/Welder

Simple Work Order

WO / Task Description

Remove API West bay from service, blind off, remove lids and clean them, clean out bay, hydro test with dye from environmental, repair skimmer and any other issues found, Replace lid gaskets with upgraded nitrile material, replace lids and remove blinds.

Safety and Procedures

Equipment

Equip #: Z-84-T5 **Equip Name:** West API Bay
Area: Gallup **Location:** 84-Tanks
Unit: 30 Tank Farm

Activities to Perform

Details

Last Repair Date: 9/1/17 **Last Repair Type:** 06-Compliance
Work Type: 06-Compliance **Priority:** G3-Routine (21Days)
Requested By: Puckett, Michael Travis **Requested On:** 03/02/2017

Resource Requirements

Type	INV-PL=Inventory Part (Planned)	INV-UN=Inventory Part (Unplanned)	INV-PP=Inventory Part (Planning Only)
Legend:	PCI-PL=Direct Purchase (Planned)	PCI-UN=Direct Purchase (Unplanned)	PCI-PP=Direct Purchase (Planning Only)
	NC/NI-PL=Non-Catalog/Non Inventory(Planned)	NC/NI-UN=Non-Catalog/Non Inventory(UnPlanned)	

INV-UN	Item : 156984	GASKET, SPIRAL WOUND, 8", 150 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601	Qty Req'd / UOM: 6.00 ea
	Pick List #:	Bin Location: MF26	Requested by: Parra, Daniel
	Deliver To Location:	Gallup Main Storehouse	
INV-UN	Item : 110802	GASKET, SPIRAL WOUND, 4", 150 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601	Qty Req'd / UOM: 2.00 ea
	Pick List #:	Bin Location: MF26	Requested by: Parra, Daniel
	Deliver To Location:	Gallup Main Storehouse	
INV-UN	Item : 148959	VALVE, GATE, 8", 150 LB, RF, CS BODY, STD TRIM 13% CR	Qty Req'd / UOM: 1.00 ea
	Pick List #:	Bin Location: YARDR2	Requested by: Parra, Daniel
	Deliver To Location:	Gallup Main Storehouse	
NC/NI-PL	Qty Req'd / UOM: 8.00 ea	ZG90240 - gasket 1/4" nitrile section 531	
NC/NI-PL	Qty Req'd / UOM: 8.00 ea	ZG90241 - gasket 1/4" nitrile section 532	
NC/NI-PL	Qty Req'd / UOM: 8.00 ea	ZG90242 - gasket 1/4" nitrile section 532 (A) opposite side	
NC/NI-PL	Qty Req'd / UOM: 8.00 ea	ZG90243 - gasket 1/4" nitrile section 533	
	Qty Req'd / UOM: 8.00 ea		

NC/NI-PL		ZG90244 - gasket 1/4" nitrile section 534	
	Qty Req'd / UOM: 8.00 ea		
NC/NI-PL		ZG90245 - gasket detail C-C 1/4" closed cell sponge	
	Qty Req'd / UOM: 4.00 ea		
NC/NI-PL		ZG90246 - gasket detail F-F 1/4" nitrile	
	Qty Req'd / UOM: 4.00 ea		
NC/NI-PL		ZG90247 - gasket detail 19631-602-7 3/8" nitrile	
	Qty Req'd / UOM: 4.00 ea		
INV-UN	Item : 148803	TAPE, SAFETY BARRIER, CAUTION, 3" X 1000' X 4 MIL, YELLOW, 19-019-948	
	Pick List #:	Bin Location: MG35B	Qty Req'd / UOM: 2.00 ea
	Deliver To Location:	Gallup Main Storehouse	Requested by: Parra, Daniel
INV-UN	Item : 110803	GASKET, SPIRAL WOUND, 6", 150 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601	
	Pick List #:	Bin Location: MF26	Qty Req'd / UOM: 7.00 ea
	Deliver To Location:	Gallup Main Storehouse	Requested by: Parra, Daniel
INV-UN	Item : 148645	ADHESIVE, SILICONE CAULKING	
	Pick List #:	Bin Location: MB62	Qty Req'd / UOM: 10.00 ea
	Deliver To Location:	Gallup Main Storehouse	Requested by: Parra, Daniel
INV-UN	Item : 114527	BOOK, PERMIT, REFINING, WESTERN, 8.5" X 14", 3 PARTS, DIGITAL FULL COLOR/BLACK, 25 PER PAD, BUTLERS P/N # 7241	
	Pick List #:	Bin Location: LOFTH3C	Qty Req'd / UOM: 3.00 ea
	Deliver To Location:	Gallup Main Storehouse	Requested by: Parra, Daniel
INV-UN	Item : 150706	GASKET, FLAT, 4", EPDM, FOR PVC, #3869.240	
	Pick List #:	Bin Location: MB610	Qty Req'd / UOM: 1.00 ea
	Deliver To Location:	Gallup Main Storehouse	Requested by: Parra, Daniel
INV-UN	Item : 150881	GASKET, SPIRAL WOUND, 2", 150 LB, 316/FG, CS OUTER RING	
	Pick List #:	Bin Location: ME1P	Qty Req'd / UOM: 2.00 ea
	Deliver To Location:	Gallup Main Storehouse	Requested by: Parra, Daniel
INV-UN	Item : 148636	LUBRICANT, KOPRKOTE, 1 LB	
	Pick List #:	Bin Location: MB62	Qty Req'd / UOM: 5.00 ea
	Deliver To Location:	Gallup Main Storehouse	Requested by: Parra, Daniel

Planning Comments

week of 5-29-2017

Labor Requirements

Trade	Qty	Est. Hours	Assigned To
GAL Pipefitter/Welder	0	0.00	

Failure Information**Reason for Failure:**

- Accidental Damage
 Corrosion/Erosion
 Cracked
 Incorrect Installation
 Mechanical Failure
 No Failure Noted
 Unknown/Not Specified

Action Taken:

- Inspected
 No Action Taken
 Rebuilt
 Repaired
 Tested
 Tightened
 Welded

Reason for Lost Time:**Gallup Refining**

Printed by: Parra, Daniel

Page: 2 of 4

Printed on: 4/25/2018

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Accident | <input type="checkbox"/> Equipment In Use | <input type="checkbox"/> Incomplete Scope | <input type="checkbox"/> Incorrect Parts |
| <input type="checkbox"/> Incorrect Tools | <input type="checkbox"/> No Lost Time | <input type="checkbox"/> Reassigned | <input type="checkbox"/> Travel to/from Job Site |
| <input type="checkbox"/> Unsafe Conditions | <input type="checkbox"/> Waiting For Approval | <input type="checkbox"/> Waiting For Assistance | <input type="checkbox"/> Waiting for Lockout |
| <input type="checkbox"/> Waiting for Parts | <input type="checkbox"/> Waiting For Permits | <input type="checkbox"/> Waiting For Tools | |

Completion Information

Job Complete Ops: _____ Completed on: _____
Please Print Name

Job Complete Mtce: _____ Completed on: _____
Please Print Name

Comments:

Removed thread brass shaft from sludge valve and installed stainless steel threaded shaft on new sludge valve.
 Removed thread brass shaft from sludge valve and installed stainless steel threaded shaft on new sludge valve.
 Install all the lids at west api bay still need to finish tighten nuts. Change out bolts and gaskets. Vac water north end in order to install the north lid.

Make It Happen Safely!



WO/Task #: 2624448-3



Task Title: Close Skimmer and Test for Leaks

Equipment: Z-84-T6



Crew: Pipefitter/Welder

Multi-Task WO (Task)

Task 3 Description:

Safety and Procedures

Work Order Summary

WO #: 2624448 WO Title: Skimmer on the East API
Work Type: 01-Corrective Maintenance Priority: G3-Routine (21Days)

WO Description: Please check the skimmer on the east API bay it is not working properly.

Equipment

Equip #: Z-84-T6 Equip Name: East API Bay
Area: Gallup Location: 84-Tanks
Unit: 30 Tank Farm

Activities to Perform

Details

Last Repair Date: 12/11/17 Last Repair Type: 01-Corrective Maintenance
Work Type: 01-Corrective Maintenance Priority: G3-Routine (21Days)
Requested By: Parra, Daniel Requested On: 07/06/2016
Date Closed: 03/28/2018

Resource Requirements

Legend table with columns: Type, INV-PL=Inventory Part (Planned), INV-UN=Inventory Part (Unplanned), INV-PP=Inventory Part (Planning Only), PCI-PL=Direct Purchase (Planned), PCI-UN=Direct Purchase (Unplanned), PCI-PP=Direct Purchase (Planning Only), NC/NL-PL=Non-Catalog/Non Inventory(Planned), NC/NL-UN=Non-Catalog/Non Inventory(UnPlanned)

Inventory list table with columns: Item, Description, Bin Location, Qty Req'd / UOM, Deliver To Location, Requested by

Gallup Refining

INV-PL	Item : 110810 Pick List #: 101418 - 5 Deliver To Location:	GASKET, SPIRAL WOUND, 4", 300 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601 Bin Location: MF27 Gallup Main Storehouse	Qty Req'd / UOM: 1.00 ea Requested by: Parra, Daniel
INV-PL	Item : 148645 Pick List #: 101418 - 6 Deliver To Location:	ADHESIVE, SILICONE CAULKING Bin Location: MB62 Gallup Main Storehouse	Qty Req'd / UOM: 12.00 ea Requested by: Parra, Daniel
INV-PL	Item : 150706 Pick List #: 101418 - 7 Deliver To Location:	GASKET, FLAT, 4", EPDM, FOR PVC, #3869.240 Bin Location: MB610 Gallup Main Storehouse	Qty Req'd / UOM: 1.00 ea Requested by: Parra, Daniel
INV-PL	Item : 150703 Pick List #: 101418 - 8 Deliver To Location:	GASKET, FLAT, 2", EPDM, FOR PVC, #3869.220 Bin Location: MB610 Gallup Main Storehouse	Qty Req'd / UOM: 1.00 ea Requested by: Parra, Daniel
INV-PL	Item : 110804 Pick List #: 101418 - 9 Deliver To Location:	GASKET, SPIRAL WOUND, 2", 300 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601 Bin Location: MF27 Gallup Main Storehouse	Qty Req'd / UOM: 3.00 ea Requested by: Parra, Daniel
NC/NI-PL	Qty Req'd / UOM: 4.00 ea	gasket 1/4" nitrile section 531	
NC/NI-PL	Qty Req'd / UOM: 4.00 ea	gasket 1/4" nitrile section 532	
NC/NI-PL	Qty Req'd / UOM: 4.00 ea	gasket 1/4" nitrile section 532 (a) opposite side	
NC/NI-PL	Qty Req'd / UOM: 4.00 ea	gasket 1/4" nitrile section 533	
NC/NI-PL	Qty Req'd / UOM: 4.00 ea	gasket 1/4" nitrile section 534	
NC/NI-PL	Qty Req'd / UOM: 2.00 ea	gasket detail C-C 1/4" closed cell sponge	
NC/NI-PL	Qty Req'd / UOM: 2.00 ea	gasket detail F-F 1/4" nitrile	
NC/NI-PL	Qty Req'd / UOM: 2.00 ea	gasket detail 19631-602-7 3/8" nitrile	
INV-UN	Item : 110800 Pick List #: Deliver To Location:	GASKET, SPIRAL WOUND, 2", 150 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601 Bin Location: MF26 Gallup Main Storehouse	Qty Req'd / UOM: -3.00 ea Requested by: Parra, Daniel
INV-UN	Item : 150887 Pick List #: Deliver To Location:	GASKET, SPIRAL WOUND, 6", 150 LB, 316/FG, CS OUTER RING Bin Location: ME1P Gallup Main Storehouse	Qty Req'd / UOM: -2.00 ea Requested by: Parra, Daniel
INV-UN	Item : 110802 Pick List #: Deliver To Location:	GASKET, SPIRAL WOUND, 4", 150 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601 Bin Location: MF26 Gallup Main Storehouse	Qty Req'd / UOM: -1.00 ea Requested by: Parra, Daniel
INV-UN	Item : 110810 Pick List #: Deliver To Location:	GASKET, SPIRAL WOUND, 4", 300 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601 Bin Location: MF27 Gallup Main Storehouse	Qty Req'd / UOM: -1.00 ea Requested by: Parra, Daniel

Gallup Refining

INV-UN	Item : 148645	ADHESIVE, SILICONE CAULKING	Qty Req'd / UOM: -10.00 ea
	Pick List #:	Bin Location: MB62	Requested by: Parra, Daniel
	Deliver To Location:	Gallup Main Storehouse	
INV-UN	Item : 110804	GASKET, SPIRAL WOUND, 2", 300 LB, 304 SS, FG/CS OUTER RING, STANDARD API 601	Qty Req'd / UOM: -1.00 ea
	Pick List #:	Bin Location: MF27	Requested by: Parra, Daniel
	Deliver To Location:	Gallup Main Storehouse	

Planning Comments

Labor Requirements

Trade	Qty	Est. Hours	Assigned To
GAL Pipefitter/Welder	4	56.00	

Failure Information

Completion Information

Job Complete Ops: _____ Completed on: _____
Please print name

Job Complete Mtce: _____ Completed on: _____
Please print name

Comments:

Make It Happen Safely!

No blob info printed for Print-Previewing