



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor



State of New Mexico
ENVIRONMENT DEPARTMENT
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
BRUCE YURDIN
Acting Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 19, 2018

Jessica L. O'Brien
Environmental Supervisor
Western Refining, Southwest Inc., Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

**RE: DISAPPROVAL
INVESTIGATION WORK PLAN OW-58 TWIN WELL
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-18-005**

Dear Ms. O'Brien:

The New Mexico Environment Department (NMED) has reviewed the *Investigation Work Plan OW-58 Twin Well* (Work Plan), dated August 2018, submitted on behalf of Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Disapproval. The Permittee must address the following comments.

Comment 1

The Permittee submitted two copies of the Work Plan. One of copies was submitted unbound. Although there are no formal requirements to bind submittals, submittal of bound documents facilitates review and placement in the Hazardous Waste Bureau Administrative Record. Submit all future documents that contain more than 20 pages as bound documents. Refer to Comment 1 in the NMED's *Approval with Modifications for Revised OW-14 Source Area Investigation Work Plan OW Series Wells and Contaminant Plume Migration*, dated May 12, 2016 as well as NMED's September 7, 2018 letter, *Document Submittal Requirements*.

Comment 2

In the *Executive Summary* Section, page E1, the Permittee states, "[a]n investigation was conducted in the OW-14 Source Area in September 2016, which included the installation of two

new permanent monitoring wells (OW-57 and OW-58).” Since the rationale for installing OW-58 originates from the OW-14 Source Area investigation, it is essential for NMED to review the OW-14 investigation report. Although the *Revised OW-14 Source Investigation Work Plan* was approved on May 12, 2016, the report documenting the investigation has not been submitted to NMED. Even though some information regarding the investigation was included in separate submittals (e.g., Appendix D in the *Facility Wide Ground Water Monitoring Work Plan – Updates for 2018*), a full and detailed investigation report was not submitted. The Permittee must provide a report that summarizes the results of the OW-14 source investigation so that NMED can conduct an informed review of this Work Plan. The Permittee has not included the report in the investigation implementation schedule shared with NMED. The Permittee must submit the investigation report to NMED before NMED can continue its technical review of this Work Plan. During a May 2018 meeting between the Permittee and NMED, the Permittee indicated that unapproved additional work, conducted at risk, was ongoing regarding the OW-14 source area investigation. It is not clear if the Permittee considers this Work Plan as part of the discussed additional work. A separate report must be submitted for that work plan. Submit the OW-14 source area investigation report for NMED review no later than **November 17, 2018**.

Comment 3

In the Section 2, *Background*, page 2-2, the Permittee states, “[a] possible leak from a seam in an unidentified storage tank located adjacent to Tank 569 was reported to have been repaired in 1995 (Giant, 1997). It is likely that this leaking tank resulted in the observed presence of [separate phase hydrocarbons] SPH instead of the burial of leaked tank bottoms.” Currently, Tanks 568, 570, 571, 572, 581, 582, and 716 are located adjacent to Tank 569. Provide information indicating whether the “unidentified storage tank” is one of these tanks; otherwise, provide a figure showing the location of the unidentified storage tank and discuss the current status of the tank in the revised Work Plan. In addition, provide a basis for stating the probable source of SPH is the unidentified storage tank, rather than the burial of leaked tank bottoms in the revised Work Plan. It should be noted that there are multiple potential SPH sources in the source area. Tables previously provided by the Permittee indicate that Tanks 569, 570, 571, 572, 581, and 582 contain gasoline or gasoline-range hydrocarbons. If hydrocarbon fingerprint analysis was previously conducted for SPH collected from wells in the vicinity of the source area (e.g., RW-1 or RW-2), provide the results of the analysis or reference the submittals where the results were included. Otherwise, propose to collect SPH from all wells in the source area where detected for hydrocarbon fingerprint analysis in the revised Work Plan.

Comment 4

In the Section 2, *Background*, page 2-2, the Permittee states, “[t]he borings logs are included in Appendix A and the chemical analyses are included in Table 2.” Table 2, *Groundwater Analyses*, presents historical concentrations of constituents in the groundwater samples collected from the relevant wells up to 2016. However, new data that were collected in 2017 and 2018 are not included in the table. Since review of recent data will help NMED to provide more appropriate direction to execute the Work Plan, new data must be provided in the OW-14 source area investigation report required by Comment 2.

Comment 5

In the Section 2, *Background*, page 2-2, the Permittee states, “[t]he boring logs and chemical analyses were also previously provided in the 2018 Update of the Facility-Wide Ground Water Monitoring Work Plan.” It should be noted that the chemical analyses presented in Table 2 were not included in the *2018 Update of the Facility-Wide Ground Water Monitoring Work Plan* (FWGWMP). Remove this statement from the revised Work Plan.

Comment 6

In the Section 3.2, *Subsurface Conditions*, page 3-2, the Permittee states, “[f]luid level measurements for 2013 through 2016 are included Table 3.” The 2018 FWGWMP presents the depth to groundwater (DTW) data from March to December 2017. The Section 4.1, *Investigation*, also provides a DTW data in April 25, 2018. Since new DTW data is available, it must be provided in the OW-14 source area investigation report required by Comment 2. Include all new data in the report. In addition, according to Table 3, well OW-58 was installed in September 22, 2016, and the SPH column thickness was recorded as 0.98 feet in September 30, 2016. However, Appendix C-1 in the 2018 FWGWMP indicates well OW-58 was installed in October 3, 2016, and SPH was non-detect during all four 2017 gauging events. Verify the date of installation and correct the discrepancy. Also, provide an explanation for why SPH detected in September 30, 2016 disappeared in 2017.

Comment 7

In the Section 4.1.1, *Soil Sample Field Screening and Logging*, page 4-1, the Permittee states, “[t]he soil boring will be drilled to a depth of 30 feet and continuously logged and samples field screened.” According to the OW-58 boring log in Appendix A, *Boring Logs*, a sand lens appears to be present at a depth around 33 feet below ground surface (bgs). The soil boring must be sampled continuously to a depth of 35 feet bgs. If sand lenses are observed during the process of installation, place the screen interval to intercept the sand lenses. If the proposed well is to be completed at 35 feet bgs due to the presence of sand lenses, the screened interval must be placed from 20 to 35 feet bgs. Revise the Work Plan to propose to advance the boring to 35 feet bgs, as necessary.

Comment 8

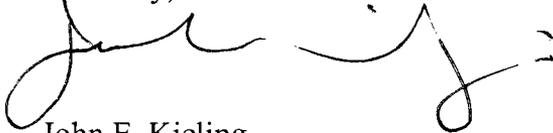
In the Section 4.1.3, *Groundwater Sample Collection*, page 4-3, the Permittee states, “[g]roundwater samples will be collected within 24 hours of the completion of well purging using disposal bailers.” SPH may be present in the well at a time when collecting groundwater samples. If SPH is present, propose to gauge the well for SPH thickness and collect a SPH sample for hydrocarbon fingerprinting analysis in the revised Work Plan.

Ms. O'Brien
October 19, 2018
Page 4

The Permittee must address all comments in this Disapproval. The response must include a letter that cross-references where the modifications were addressed in the revised Work Plan. Additionally, an electronic redline-strikeout version of the Work Plan and a revised electronic copy of the Work Plan must be submitted to NMED no later than **December 31, 2018**.

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

Sincerely,



John E. Kielling
Chief
Hazardous Waste Bureau

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

File: Reading File and WRG 2018 File
HWB-WRG-18-005