



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 20, 2018

John Moore
Environmental Superintendent
Western Refining, Southwest Inc., Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS
REVISED FACILITY WIDE GROUNDWATER MONITORING WORK PLAN
2018 – UPDATES FOR 2018
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-18-002**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Revised Facility Wide Groundwater Monitoring Work Plan 2018 – Updates for 2018* (Response), dated November 28, 2018, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). The Permittee must address the following comments provided by NMED.

Comment 1

The Permittee's response to NMED's *Approval with Modifications* Comment 9 states, "Table 1 has been modified to reflect the addition of OAPIS-1 (Attachment E)." Table 1 lists OAPIS-1 twice. Remove one of the listings from the table. In addition, Comment 9 requires the Permittee to add analysis for 1,2-dibromoethane (EDB) using the EPA Method 8011. The required change for OAPIS-1 is not included in Table 1. Include the required change in the table. Revise the table accordingly.

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Comment 2

The analytical method for volatile organic compounds (VOC) is indicated as the EPA Method 8060 for MKTF-1 in Table 1. The analytical method was incorrectly referenced. The analytical method must be corrected to reference the EPA Method 8260. Correct the error in the table.

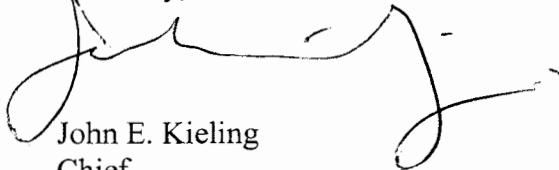
Comment 3

As stated by Comment 26 in the January 31, 2018 *Disapproval for the 2015 Annual Groundwater Monitoring Report*, the Permittee is required to conduct EDB analysis using the EPA Method 8011 for all wells where 1,2-dichloroethane (EDC) is detected. Although well GMW-1 has not been sampled recently due to the detection of separate phase hydrocarbons (SPH), EDC was detected from the well in the past. Therefore, the Permittee must collect groundwater samples for EDB analysis from well GMW-1. Tables 1 and 2 did not include EDB analysis for GMW-1. Revise Tables 1 and 2 to address the change.

Address all comments in this letter and provide replacement tables. Additionally, an electronic version of the updated Work Plan including the replaced tables must be submitted to NMED. The response letter, replacement tables, and electronic version, including a redline-strikeout version of the modified tables, of the updated Work Plan must be submitted to NMED no later than **January 28, 2019**.

If you have questions regarding this letter, 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
D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
C. Chavez, OCD
L. King, EPA Region 6
B. Moore, WRG

File: Reading File and WRG 2018 File
HWB-WRG-18-002