



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

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](http://www.env.nm.gov)



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 16, 2019

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

**RE: APPROVAL  
AOC 17 RAILROAD LOADING/UNLOADING FACILITY ASSESSMENT  
REPORT  
MARATHON PETROLEUM COMPANY LP, GALLUP REFINERY  
(FORMERLY WESTERN REFINING SOUTHWEST INC.)  
EPA ID # NMD000333211  
HWB-WRG-18-015**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) is in receipt of the Marathon Petroleum Company LP dba Western Refining Southwest, Inc. Gallup Refinery (the Permittee) *AOC 17 Railroad Loading/Unloading Facility Assessment Report* (Report) dated December 11, 2018. The Report was submitted in accordance with the requirements of the January 2017 Consent Order (Consent Order).

The purpose of the Consent Order is to determine whether areas of concern (AOCs) listed in Attachment 1 of the Consent Order require investigation or if the Permittee can provide sufficient information to determine that no further investigation or remediation is necessary.

Consent Order Section IV.B requires NMED to review the Report and deem the report "approved, disapproved, or disapproved in part..." The Permittee provided information required by Consent Order Section IV.C (Contents of AOC Assessment Report). NMED reviewed the Report and hereby issues this Approval.

The Report states that, “[t]he AOC is estimated to cover an area approximately by 50 feet wide by 650 feet long, but it has not been fully defined by sampling and analysis of environmental samples (Figure 2).” The AOC boundary is an administrative tool to provide visual depiction of the AOC. The potential extent of contaminants is not defined by the AOC boundary, but serves as a starting point for any investigation.

The Report states that, “[t]he subject area of concern (AOC) identified as AOC 16 [sic] is located on the northeast corner of the Main Tank Farm. It has been used for loading and unloading petroleum products and additives (e.g., methyl tert butyl ether) to and from railcars.” The Report did not include a discussion of the groundwater monitoring wells located near the Railroad Loading/Unloading Facility; however, there are wells located in the vicinity. These wells are co-located to the north and upgradient of the Facility’s Tank Farm (SWMU 6), which is also a potential source. Groundwater monitoring well OW-30 contains concentrations of benzene, MTBE, diesel range organics (DRO), and gasoline range organics (GRO) above the applicable standards. Groundwater monitoring well OW-58 contains concentrations of benzene, toluene, ethylbenzene, toluene (BTEX), MTBE, DRO, GRO, lead, and several semi-volatile organic compounds (SVOCs) above the applicable standards.

The Report provides information regarding a release that occurred on May 8, 2017; however, the C-141 form was not included in the Report (the C-141 form was previously submitted to NMED). A final report regarding that release has not yet been submitted. Additionally, a second release occurred at the Railroad Loading/Unloading Rack on March 13, 2019 after the Report was submitted; an initial C-141 has been submitted.

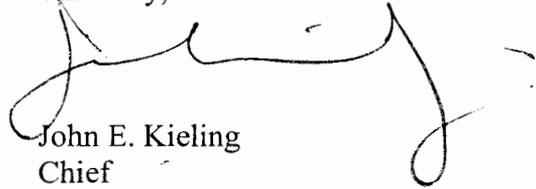
Regarding the 2017 release, the Report states that, “[t]he operator observed that gasoline had pooled in and around the pipe rack area and was flowing into the sewer box located near the rail car loading area. The Maintenance Department responded to the release and began to vacuum out the sewer box. The sewer cup overflowed onto a concrete pad located beneath the pipe rack and into a sewer drain.” Figure 2 (Facility Layout) depicts a sewer line running along the railroad track into a sanitary basin. It appears that the sanitary basin in Figure 2 may be the Railroad Rack Lagoon (SWMU 8) which no longer exists, so it is not clear where spills that enter the sewer will discharge. Figure 3 (Extent of Release Rail Car Loading Area) depicts where the sewer box and rail rack sump are located, but it is not clear if these locations are also marked on Figure 2; therefore, it is also not clear if the sewer box and rail rack sump are connected to the sewer line depicted in Figure 2.

As specified by the Consent Order Section IV.D (NMED Determination of AOC Entry or Elimination) NMED will make a determination of whether or not AOC 17 should be restored to the RCRA Permit or eliminated from corrective action requirements when NMED receives the last Assessment Report.

Mr. Moore  
April 16, 2019  
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If you have questions regarding this correspondence, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and "K".

John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: K. Van Horn, NMED HWB  
D. Cobrain, NMED HWB  
B. Moore, MPC  
L. King, EPA

File: Reading File and WRG 2019 File  
WRG-18-015





Michelle Lujan Grisham  
Governor

Howie C. Morales  
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NEW MEXICO ENVIRONMENT DEPARTMENT **ENTERED**

**Hazardous Waste Bureau**  
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**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

April 12, 2019

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

**RE: APPROVAL WITH MODIFICATIONS  
[REVISED] INVESTIGATION WORK PLAN OW-58 TWIN WELL  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-18-005**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *[Revised] Investigation Work Plan OW-58 Twin Well* (Work Plan), dated March 2019, submitted on behalf of Marathon Petroleum Company LP dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

**Comment 1**

The Permittee’s response to NMED’s Comment 3 states, “[h]owever, to provide better coverage in response to the initial request, Western is already planning to collect SPH samples from all existing wells within the tank farm where SPH is present for fingerprint analysis. This information will be provided in the email response that is due May 7, 2019 pursuant to the aforementioned comments no. 5 and 11.” NMED concurs with the Permittee’s proposal.

Mr. Moore  
April 12, 2019  
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**Comment 2**

The Permittee's response to NMED's Comment 6 states, "[t]herefore, the need to drill a second shallower well with the screen set across the higher interval where SPH was encountered during drilling." The sentence is incomplete. Revise the statement for clarity in a response letter.

**Comment 3**

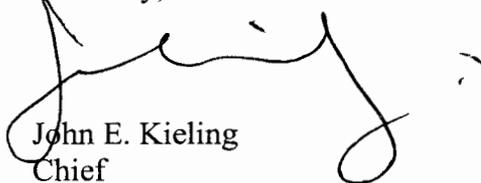
The Permittee's response to NMED's Comment 8 states, "[o]n page 4-7, Section 4.1.7, Chemical Analyses, a provision has been added to specify that SPH will be analyzed by SW-846 Method 8015." The purpose of SPH analysis is to identify potential source of release. Therefore, the analytical method must be accurate enough to distinguish fraction of gasoline, diesel and oil range organics at a minimum. It is not clear whether Method 8015 is capable of identifying these three ranges simultaneously. If appropriate, conduct SPH analysis using the methods that can identify its constituents more accurately (e.g., Paraffin, Isoparaffins, Aromatics, Naphthalene, and Olefins – PIANO analysis). Provide a response in the response letter.

The Permittee must address all comments in this Approval with Modifications and submit a response letter. The response letter must be submitted to NMED no later than **April 30, 2019**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

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 2019 File  
HWB-WRG-18-005