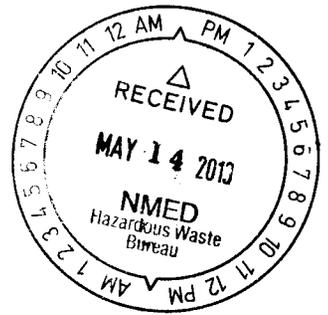




**Marathon
Petroleum Company LP**

 **ENTERED**



May 9, 2019

Mr. John E. Kieling, Chief
New Mexico Environmental Department 2905
Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505-6303

**Re: Response to Approval With Modifications
Evaporation Pond Berm Testing
Marathon Petroleum Company LP, Gallup Refinery
(dba Western Refining Southwest, Inc.)
EPA ID# NMD000333211
HWB-WRG-19-004**

Dear Mr. Kieling:

The Marathon Petroleum Company (MPC), Gallup Refinery is submitting the enclosed responses to New Mexico Environmental Department (NMED) comments dated April 12, 2019 on the referenced Work Plan for Evaporation Pond Berm Testing. Responses to each of the comments contained in the Approval with Modifications letter are provided in the attached pages.

If you have any questions or comments, please call Brian Moore at 505-726-9745.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,
Marathon Petroleum Company LP

Robert S. Hanks

Robert S. Hanks
Refinery General Manager

Enclosure

cc K. Van Horn NMED
C. Chavez NMOCD
L. King EPA Region VI
B. Moore Marathon Gallup Refinery

**92 Giant Crossing Road
Gallup, NM 87301**



May 9, 2019

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

Attn: Mr. John E. Kieling - Chief
Hazardous Waste Bureau

Re: Response to NMED Review Comments
Evaporation Pond Berm Testing (Work Plan)
Marathon Petroleum Company LP, Gallup Refinery
(dba western Refining Southwest, Inc.)
EPA ID # NMD000333211
HWB-WRG-19-004
92 Giant Crossing Road
Gallup, New Mexico
Terracon Proposal Reference No. P66195049

Dear Mr. Kieling:

At your request, Terracon Consultants, Inc. (Terracon) is submitting this letter in response to review comments provided by the New Mexico Environment Department (NMED) in a letter dated April 12, 2019 for the referenced Work Plan. Our responses to each of the review comments are outlined below:

Comment 1

Under the heading "Updated Numerical Slope Stability Analysis", page 1, the Permittee states that "[f]ield investigation activities will begin with installing 10 new piezometers that will be used to complete the updated numerical slope stability analysis." Provide the rationale for the locations selected for the permanent piezometers. The locations correspond to the previous locations of temporary piezometers at Pond 7, Pond 6 (West to East), and Pond 9A. In the report, discuss whether the piezometers are located along berms that have been repaired or upgraded. Additionally, piezometers are proposed for the Pond 7/8 west berm; NMED recommends installing additional piezometers closer to Pond 8 due to concerns of pond water leaching into groundwater at the western end of the evaporation ponds.

Response – The borings will be located at both repaired and upgraded berms. Pond 7 was repaired due to a breach. Pond 9 was upgraded with the placement of additional fill. It is our professional opinion that the proposed number and location of borings are adequate to address the concerns of NMED and perform the necessary analysis. Several borings

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and piezometers (Pond 7/8 designation) are proposed along the west berm of Pond 7 near the boundary with Pond 8. We assume that the berms for Pond 7 and Pond 8 were constructed at the same time and are adjoining ponds. It is our opinion that the borings located near Pond 7 and Pond 8 should accurately represent the subsurface conditions along the west berm including Pond 7 and Pond 8. Annual groundwater monitoring reports do not indicate leaching of pond water into the groundwater. Therefore, it is our opinion that additional piezometers closer to Pond 8 would not be warranted or required. The report will discuss the location of borings/piezometers in relation to repaired or upgraded berm locations.

Comment 2

Under the heading "Updated Numerical Slope Stability Analysis", page 2, first paragraph, the Permittee states, "[p]revious slope stability analyses conducted at the evaporation pond berms were completed using data from temporary drive point piezometers that were abandoned during ongoing berm improvement activities. The ten new piezometers shown on Figure 1 will be installed as permanent structures with bentonite seals above the screen interval to prevent surface water intrusion and interference." Provide the diameter of the piezometers.

Response – The diameter of the piezometers will be a minimum of 2 inches.

Comment 3

Under the heading "Updated Numerical Slope Stability Analysis", page 2, second paragraph, the Permittee states, "[r]epresentative soil samples will be collected during piezometer installation and submitted to Advanced Terra Testing laboratories in Lakewood, CO for geotechnical analysis including: Soil characterization; Wet and dry unit weights with moisture content; Atterberg limits; Sieve analysis; Effective stress parameters (c' and ϕ') from a consolidated-drained triaxial shear test." Describe the method proposed to collect the soil samples and whether the samples will be disturbed or undisturbed.

Response – Both disturbed and undisturbed soil samples will be collected. Undisturbed soil samples will be collected using the Dames and Moore Ring Barreled Sampler (2.42" I.D., 3" O.D.) or thin-walled Shelby Tubes (2" O.D.). Disturbed soil samples will be obtained using standard Split-spoon samplers (1-3/8 I.D., 2" O.D.). Undisturbed soil samples will be used for unit weight/dry density, unconfined compressive strength, direct shear and consolidated-Drained triaxial shear. Disturbed or undisturbed soil samples will be used for moisture content, Atterberg Limits, and sieve analysis.

Comment 4

Under the heading "Updated Numerical Slope Stability Analysis", page 2, third paragraph, the Permittee states, "[t]o determine the phreatic surface level within the berms, water levels will be recorded from the new piezometers on a monthly basis until stable (about three months). " Describe how the water levels will be measured and recorded.

Response – The water levels will be measured using a Solinst Interface Meter Model 122. The water level meter has light and audible warning indicators when water has been encountered in the piezometers. The depth to groundwater (in feet) will be referenced in accordance with top of the surveyed piezometer casing.

Comment 5

Ensure that the soil boring logs contain detailed enough descriptions of the soils encountered and note any discontinuities.

Response - Acknowledged

Comment 6

Under the heading "Updated Numerical Slope Stability Analysis", page 2, the Permittee states, "[a]s requested by NMED, results of the slope stability analysis investigation described in this work plan will be submitted to NMED in an Updated Slope Stability Report." The work conducted under this Work Plan must be submitted as a separate report.

Response - Acknowledged

We trust that the responses to your review comments have been adequately addressed. If you have any questions concerning this letter, or if we may be of further service, please contact us.

Sincerely,

Terracon



Michael E. Anderson, P.E.
Principal

Copies to: Addressee (1 via email, 3 via mail)