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May 13, 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 NMED Comment 14, March 21, 2019 Disapproval Letter  
Annual Groundwater Monitoring Report for 2017  
Explanation of Benzene Concentrations in STP-1  
Marathon Petroleum Company LP, Gallup Refinery  
(dba Western Refining Southwest Inc.)  
EPA ID# NMD000333211  
HWB-WRG-18-014**

Dear Mr. Kieling:

The Marathon Petroleum Company (MPC), Gallup Refinery is submitting this letter in response to New Mexico Environmental Department (NMED) Comment 14 in the Disapproval letter dated March 21, 2019. In this letter, the NMED requested MPC to explain the benzene concentrations detected within sewage treatment plant STP-1. Specifically, Comment 14 states:

“...Benzene should not be present in the evaporation ponds. Submit a separate letter to explain why benzene is not being effectively treated in STP-1. In addition, explain why the benzene concentrations in the wastewater sample collected from pond EP-12B also exceeded the applicable standard....”.

The wastewater that is treated in STP-1 is pumped through activated carbon canisters as a polishing step in the treatment process. The filters are checked routinely during the operating shifts however, occasionally, a “slug” of organics will be pumped through the activated carbon which causes breakthrough of organic constituents within the wastewater irregardless of the frequency of monitoring. MPC is aware of this issue and is currently in the process of designing a new wastewater treatment system to replace STP-1 and the current filtration system.

Sincerely,  
**Marathon Petroleum Company LP**

Brian K. Moore  
Senior HSE Professional

Enclosure

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

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