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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 10, 2019

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

**RE: APPROVAL WITH MODIFICATIONS
INVESTIGATION WORK PLAN SWMU NO. 13 – DRAINAGE DITCH
BETWEEN API EVAPORATION PONDS AND NEUTRALIZATION TANK
EVAPORATION PONDS
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID# NMD000333211
HWB-WRG-19-011**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Investigation Work Plan SWMU No. 13 – Drainage Ditch Between API Evaporation Ponds and Neutralization Tank Evaporation Ponds* (Work Plan), dated May 2019, submitted on behalf of Marathon Petroleum Company LPC dba Western Refining Southwest Inc., Gallup Refinery (Permittee) and hereby issues this Approval with Modifications, the Permittee must address the following comments.

Comment 1

In Section 2 (Background), pages 2-3 and 2-4, the Permittee states that in 2002 a contractor reported, “the ditch has been and continues to be used to transfer refinery wastewater between evaporation ponds;” and that, “neither water sample or bottom sludge/sediment samples had been collected from the ditch.” The Permittee also states that a response letter in 2015, “... noted the drainage ditch was being used to convey non-contact storm water and that the ditch did not receive flows from the evaporation ponds. The area has since been regraded such that stormwater

is no longer conveyed through either the ditch or the small “pond” area to the south. The only water entering these areas now is rainfall and there is no active use of these features.” The regrading of the ditch may affect the original surface of the drainage ditch (e.g., it is buried or the original surface was reworked). If this is the case, surface soil samples will not be representative. Adjust the proposed sampling interval, if needed. Discuss whether the surface of the ditch was reworked or buried in the investigation report.

Comment 2

In Section 4 (Scope of Services) the Permittee states, “[a] groundwater investigation is not proposed in this work plan, as there are currently two new permanent monitoring wells proposed in the immediate area under the SMW-2 & GMW-1 Areas Investigation Work Plan (Figure 5) (DiSorbo, 2018). However, if groundwater is encountered during drilling of the soil borings, then a temporary well will be installed and groundwater samples will be collected.” Provide the boring logs, well installation information, and groundwater analytical results for the proposed wells installed in the SMW-2 and GWM-1 Area investigation in the investigation report for SWMU 13 since the information is likely related and useful for characterization.

Comment 3

In Section 4.1 (Investigation) the Permittee states, “[f]ive soil borings will be located within the drainage ditch and two within the pond area (Figure 6). These borings will be completed using a hand auger with target completion depths of 3 feet, unless refusal is reached at a shallower depth.” The Permittee also states, “[d]ue to physical limitations accessing locations within the ditch and pond areas, deeper borings to be completed using the hollow stem auger method will be located outside but immediately adjacent to the ditch and pond areas. There are five deep soil borings located adjacent to the ditch and two deep soil borings adjacent to the pond area (Figure 6). The deeper borings to be completed using hollow stem augers will have a target completion depth of 10 feet to determine if soils beneath the ditch and pond have been impacted.” Ensure that the elevation at each boring is recorded so that the depths within the borings may be compared.

Comment 4

In Section 4.1 (Investigation) the Permittee states, “[a]s necessary, additional investigation of soils may be conducted to define the lateral extent of any identified releases. If there are indications of lateral migration of constituents, then additional borings may be completed within approximately 30 feet of the original boring location.” Since the area around SWMU 13 is surrounded by other units, such as the Evaporation Ponds and the OCD Landfarm, the proposed 30 feet step-out distance will result in the collection of data not related to SWMU 13. If step-out borings are necessary, then the Permittee must initially step out no further than five feet.

Comment 5

In Section 4.1.2 (Drilling Activities) the Permittee states, “[t]he temporary well completion will be left open for a minimum of two weeks to allow for the possible entry of phase-separated hydrocarbons into the well, if present. If after two weeks has passed and no SPH has entered the well, then groundwater samples will be collected from the temporary well completion pursuant to Section 4.1.3 below.” Previous correspondence from NMED required temporary wells to

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remain open for two weeks following completion. Upon further consideration, any temporary well must be kept open for 48 hours rather than two weeks.

Comment 6

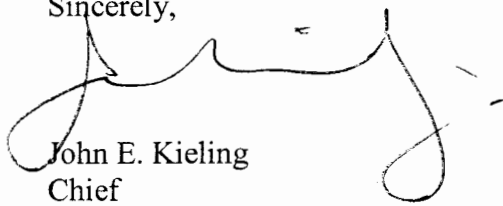
The Permittee did not include a proposed schedule to conduct the proposed investigation work and submit an investigation report. In future work plan submittals, include a proposed schedule as required by RCRA Permit Section IV.H.5.a.ii (Investigation Work Plan Requirements).

This Approval with Modifications 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.

The Permittee must submit an Investigation Report that summarizes the results of the implementation of the Work Plan for NMED review no later than **January 31, 2020**.

If you have any questions regarding this letter, please contact Kristen Van Horn at (505) 476-6046.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
K. Van Horn, NMED HWB
C. Chavez, EMNRD OCD
B. Moore, Marathon
L. King, EPA

File: WRG 2019 and Reading
HWB-WRG-19-011