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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

October 2, 2019

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

**RE: APPROVAL WITH MODIFICATIONS
WORK PLAN FOR INSTALLATION OF MONITORING WELLS PER 2017 ANNUAL
GROUNDWATER REPORT COMMENTS
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-19-015**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Work Plan for Installation of Monitoring Wells per 2017 Annual Groundwater Report Comments* (Work Plan), dated August 2019, submitted on behalf of Marathon Petroleum Company 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

In the *Executive Summary* Section, the Permittee states, “[i]n a Disapproval letter dated March 21, 2019, the New Mexico Environment Department (NMED) requested additional wells be installed pursuant to Comments No. 27 and 28. In response to these comments, two new monitoring wells will be installed.” Comment 1 in NMED’s *Disapproval Annual Groundwater Monitoring Report: Gallup Refinery – 2017*, dated March 21, 2019 also states, “[p]ropose to install a sentinel groundwater monitoring well west of well OW-1 in the revised Work Plan.” A

work plan that addresses Comment 1 has not been submitted to NMED. Comment 6 in NMED's *Disapproval Response to Disapproval Work Plan 2015 Annual Groundwater Report Comments*, dated August 23, 2019 also directed installation of the groundwater monitoring wells west of well OW-1 and required a revised work plan that proposes installation of the wells no later than **October 31, 2019**. The Permittee must propose to install the wells in the revised *Work Plan 2015 Annual Groundwater Report Comments*.

Comment 2

In Section 4.3 (Soil Sample Field Screening and Logging), the Permittee states, “[v]apors present within the sample bag's headspace will then be measured by inserting the probe of the instrument in a small opening in the bag or through the foil. The maximum value and the ambient air temperature will be recorded on the field boring or test pit log for each sample.” If wells are installed in the winter and the ambient air temperature is very low, then volatile organic compounds in a soil sample may not volatilize and equilibrate, causing a low reading. If low ambient air temperature occurs during the well installation, then additional measures must be taken to more accurately measure VOCs in soil samples. Discuss the measures taken in the report.

Comment 3

In Section 4.5 (Collection and Management of Investigation Derived Waste), the Permittee states, “[d]rill cuttings, excess sample material and decontamination fluids, and all other investigation derived waste (IDW) associated with soil borings will be contained and characterized using methods based on the boring location, boring depth, drilling method, and type of contaminants suspected or encountered.” The waste containers must be clearly labeled with the date and material(s) filled if stored on site in accordance with RCRA Permit Section IV.J.2.m (Collection and Management of Investigation Derived Waste). The containers must be removed from the site and properly disposed within 90 days in accordance with 40CFR §262.34 (Accumulation Time), if the containers contain hazardous waste.

Comment 4

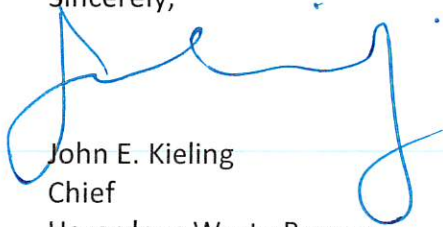
In Section 4.5 (Collection and Management of Investigation Derived Waste), the Permittee states, “[f]ield equipment requiring calibration will be calibrated to known standards, in accordance with the manufacturers' recommended schedules and procedures...” It is not clear why the statement is included in Section 4.5 because it is not relevant to the discussion of IDW. The statement may be more appropriately included in other sections (e.g., Section 4.6). No revision required.

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.

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If you have questions regarding this Approval with Modifications, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: K. Van Horn, NMED HWB
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B. Moore, WRG

File: Reading File and WRG 2019 File
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