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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

November 15, 2019

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS
REVISED INVESTIGATION REPORT OW-14 SOURCE AREA
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-19-002**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Revised Investigation Report OW-14 Source Area* (Response), dated October 24, 2019 and submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). The Permittee must address the following comments.

Comment 1

In the response to NMED's *Approval with Modifications Comment 7*, the Permittee states, "Figures 6 and 9 are revised to extend cross section C-C' to OW-14 and a separate new cross section is enclosed that extends to STP-1." NMED's *Approval with Modifications Comment 7* stated, "[s]ubmit a figure that depicts the likely subsurface conditions between Tank 570 to OW-14 and STP-1." Figure 9 (Cross Section C-C') depicts the subsurface conditions between RW-1 and OW-14, rather than the subsurface conditions between TK 570-1 and OW-14. In addition, the referenced separate new cross section extending to STP-1 is not included in the Response. Provide these figures.

Comment 2

In the response to NMED's *Approval with Modifications* Comment 10, the Permittee states, "[t]here is a detailed discussion on the soil types present in Section 4.3.1, which is not repeated in the Conclusions Section. This discussion is provided below and as shown both intervals consist of sand with clayey sand in the 16 feet to 18 feet bgl interval and silty sand in the 24 feet to 26 feet bgl interval." To clarify, the direction of NMED's Comment 10 was to include the discussion regarding the correlation between the level of contamination associated with organic constituents and soil types where elevated contaminant concentrations were detected and further develop a discussion of potential contaminant pathways, rather than to repeat Section 4.3.1 in the Conclusion Section. No revision required.

Comment 3

In the response to NMED's *Approval with Modifications* Comment 11, the Permittee states, "[t]he requested figure is enclosed. This is Figure 22 from the Investigation Report North Drainage Ditch and OW-29 & OW-30 Areas, which is reported on separately as previously directed by NMED." The Permittee provided a figure that depicts wells downgradient from OW-14 but the figure does not depict any wells upgradient from OW-14, which was referenced in the Permittee's statement. All referenced upgradient wells from OW-14 (TK-568-1, TK 568-2, OW-58) and downgradient wells (OW-55 and OW-30) should have been depicted in the figure. NMED's Comment 11 also stated, "[p]rovide a figure that includes the other downgradient wells identified in this comment to provide further context to the MTBE plume migration." The Response does not include further context to the MTBE migration. Provide the appropriate figure.

The Permittee must address all comments more accurately in all future correspondence. Provide the figures discussed in Comment 1 and Comment 3 no later than **December 31, 2019**.

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

Sincerely,



Dave Cobrain
Program Manager
Hazardous Waste Bureau

cc: K. Van Horn, NMED HWB
M. Suzuki, NMED HWB
C. Chavez, OCD
L. King, EPA Region 6 (6LCRRC)
B. Moore, WRG

File: Reading File and WRG 2019 File
HWB-WRG-19-002