



December 16, 2019

Mr. Dave Cobrain  
New Mexico Environmental Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303

**RE: Response to Approval with Modifications  
Investigation Work Plan Solid Waste Management Unit 1  
Marathon Petroleum Company LP, Gallup Refinery  
(dba Western Refining Southwest, Inc.)  
EPA ID# NMD000333211**

Dear Mr. Cobrain:

Marathon Petroleum Company LP (dba Western Refining Southwest, Inc.) Gallup Refinery is submitting this response to comments for the Investigation Work Plan for the Solid Waste Management Unit (SWMU) 1. If there are any questions, 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, Gallup Refinery

Robert S. Hanks  
Refinery General Manager

Enclosure

cc K. Van Horn NMED  
C. Chavez NMOCD  
B. Moore Marathon Gallup Refinery

**RESPONSE TO APPROVAL WITH MODIFICATIONS SWMU-1 SOIL  
SAMPLING INVESTIGATION WORK PLAN**

**NMED Comment 1:**

Under the "Scope of Activities" heading, the Permittee states, "[o]nce characterization has been completed, MPC will prepare an investigation report with results from the sampling. A risk assessment will be included with the investigation report." Since a soil removal action is planned for the remedy at the site, there is no need to conduct a risk assessment.

**MPC Response 1:**

The comment is acknowledged.

**NMED Comment 2:**

Under the heading "Scope of Activities" the Permittee states, "[s]oil recovered during sampling will be placed in roll-off boxes within the area of SWMU 1 and characterized prior to disposal." Alternately, the Permittee may return the soil cutting to the bore hole.

**MPC Response 2:**

The comment is acknowledged that the soil cuttings may also be returned to the bore hole.

**NMED Comment 3:**

Under the heading "Investigation Methods", the Permittee states, "[s]oil samples will be collected by hand-augering within SWMU 1 and along the perimeter sidewalls (Figure 3). Discrete sediment samples will be collected at 2.5-ft intervals from the surface until visual and/or instrumental contamination is no longer evident, or until a maximum depth of approximately 8 feet is reached." The Permittee does not specify if the berm sidewall samples will be collected using a hand auger or with a different tool and does not specify to what depth/horizontal position the berm sidewall samples will be collected. Provide this information in a response letter.

**MPC Response 3:**

SWMU 1 sidewall soil samples along the berm will be collected using a hand auger. The first sample will be collected from the top surface of the berm and advanced 1-foot vertically into the berm. The next sample will be collected approximately 2.5-foot below the top of the berm (Figure 3a) and advanced 1 foot horizontally into the berm side wall. Additional samples will be collected approximately at 2.5-foot intervals until the toe of the berm is reached. Samples at the toe of the

**RESPONSE TO APPROVAL WITH MODIFICATIONS SWMU-1 SOIL  
SAMPLING INVESTIGATION WORK PLAN**

berm will be collected vertically from the surface, at 2.5-foot intervals to an 8-foot maximum depth or until visual staining and/or no instrumental response is detected (Figure 3a). A sample will also be collected from any saturated intervals.

**NMED Comment 4:**

Under the heading "Sample Collection Procedures", the Permittee states, "[f]ield techniques will be applied consistently across SWMU 1 by a team of dedicated sampling personnel who may be assisted by site supervisors." RCRA Permit Section IV.J.2.d requires the presence of a qualified engineer or geologist, ensure that the proper procedures are followed in the field during sampling.

**MPC Response 4:**

The comment is acknowledged. A qualified geologist or engineer will be present during the sampling.

**NMED Comment 5:**

Under the heading "Sample Collection Procedures", item 2, regarding collection of soil and sediment samples for laboratory analysis the Permittee proposes to collect toxicity characteristic leaching procedure (TCLP samples) for lead and mercury. The Permittee must also conduct TCLP analysis for benzene.

**MPC Response 5:**

The comment is acknowledged. TCLP analysis for benzene will also be conducted.

**NMED Comment 6:**

Under the heading "Sample Collection Procedures" and the heading "Data Evaluation" the Permittee states that, "[a]nalytical data will be screened by comparison with NMED Industrial SSLs, Toxicity Characteristic levels, and the proposed (chosen) disposal facility WACs." The Permittee must also compare the analytical results to Residential SSLs and Land Disposal Restrictions, as necessary. The waste disposal facility WACs cannot be used for the risk assessment.

**MPC Response 6:**

**RESPONSE TO APPROVAL WITH MODIFICATIONS SWMU-1 SOIL  
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The comment is acknowledged. The waste disposal facility WAC will not be used for risk assessment purposes.

**NMED Comment 7:**

Under the heading "Sample Collection Frequency" the Permittee states, "Sediment sample collections will be taken in accordance with the RCRA Post-Closure Permit Section IV.J.2.d.ii (Soil and Rock Sampling) and will include the following applicable intervals and depths:

- at the surface of the proposed boring locations;
- at 2.5-ft intervals;
- at the maximum depth of each boring; and
- at intervals suspected of being source or contaminated zones."

The Permittee must also collect samples from intervals where groundwater is encountered.

**MPC Response 7:**

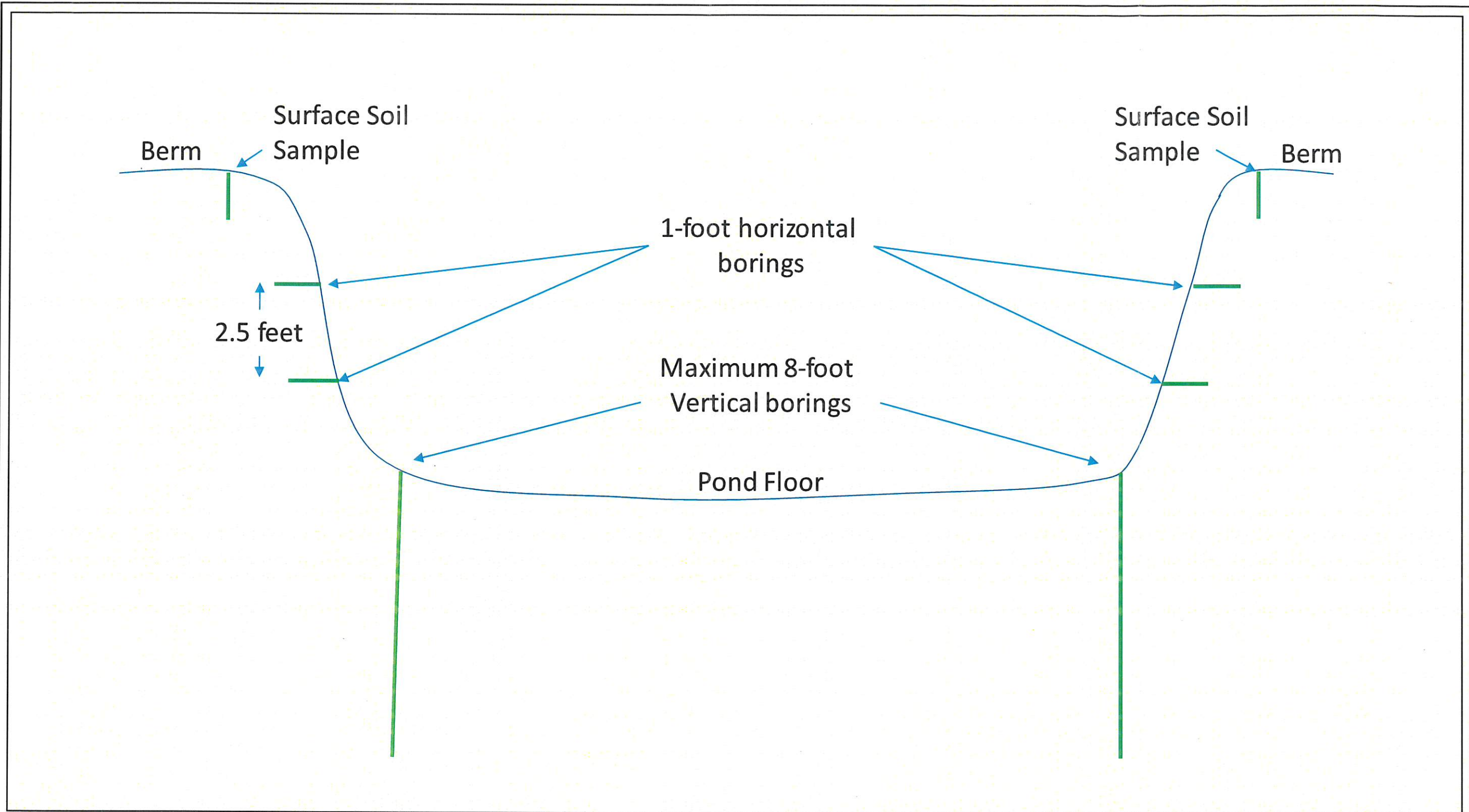
The comment is acknowledged. If groundwater is encountered, a soil sample will be collected at that interval.


**NMED Comment 8:**

The Permittee included a Standard Operating Procedure (SOP) (Appendix A) for soil sample collection. RCRA Permit Section IV.J.1 states that "[t]he Permittee shall provide a brief description of investigation, sampling or analytical methods and procedures...Facility standard operating procedures (SOPs) shall not be substituted for such descriptions." In the future, the Permittee must include this information within the main text of the Work Plan. The SOP appears to be field instructions for personnel and is generalized for all soil sampling rather than specific to the sampling that will take place for this project.

**MPC Response 8:**

The comment is acknowledged. In future work plans, standard operating procedures will be included in the text and will relate to the specific tasks for that project.



 <p>1252 Commerce Drive Laramie, WY 82070 www.trihydro.com (P) 307/745.7474 (F) 307/745.7729</p>	FIGURE 3a			
	<b>SIDEWALL SAMPLING PLAN</b>			
	<b>SWMU 1 SOILS INVESTIGATION WORK PLAN</b> <b>GALLUP REFINING DIVISION</b> <b>GALLUP, NEW MEXICO</b>			
Drawn By: PH	Checked By: HJ	Scale: Not to Scale	Date: 11/4/19	File: SWMU-1_SideSamp_Fig1a.mxd