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Western Refining Southwest, Inc.
A subsidiary of Marathon Petroleum Corporation
I-40 Exit 39
Jamestown, NM 87347

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NMED
Hazardous Waste Bureau

November 15, 2020

Mr. Kevin Pierard, Chief
New Mexico Environmental Department 2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87SOS-6303

RE: Assessment Report for AOC 30 – Laboratory
Marathon Petroleum Company LP, Gallup Refinery
(dba Western Refining Southwest, Inc.)
EPA ID# NMD000333211

Dear Mr. Pierard:

Marathon Petroleum Company LP (dba Western Refining Southwest, Inc.) Gallup Refinery is submitting this Assessment Report for the Area of Concern 30 (AOC 30) Laboratory Area required by the Consent Order which specifies that Marathon Petroleum Company submit an Assessment Report for each AOC identified in the Consent Order. If there are any questions, please call John Moore of my staff at 505-722-0205.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction of 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 D. Cobrain, NMED HWB
C. Chavez NMOCD
J. Moore Marathon Gallup Refinery

AOC 30 – Laboratory Area

Consent Order Assessment Report

(1) Location of unit(s) on a topographic map of appropriate scale, as required under 40 CFR § 270.14(b)(19);

See Figure 1 (Site Location/Topo Map) for location of Area of Concern (AOC) 30. AOC 30 includes the Laboratory building.

(2) Designation of type and function of unit(s);

The laboratory is used for on-site analysis to maintain quality control over the refinery process and to help ensure compliance with environmental regulations. It primarily handles petroleum products or related materials and water samples.

(3) Dimensions, capacities and structural description of unit(s) (supply any available plans/drawings);

The building in which the laboratory is located is approximately 40 feet by 120 feet. The laboratory building has a concrete floor with drains that connect to the Contact Waste Water Collection System (Solid Waste Management Unit 12).

(4) Dates that the unit(s) was operated;

The laboratory is believed to have been in service since the 1950s or 1960s and operated until the refinery idled in 2020. When the refinery starts back up, the laboratory will be put back in use.

(5) All available site history information;

The refinery began operation in the late 1950s and the refinery property covers an area of approximately 810 acres. The refinery location and the regional vicinity is characterized as high desert plain comprised primarily of public lands used for grazing by cattle and sheep.

The Gallup Refinery generally processes crude oil from the Four Corners area transported to the facility by pipeline or tanker truck. Various process units are operated at the facility, including crude distillation, reforming, fluidized catalytic cracking, alkylation, isomerization, sulfur recovery, merox treater, and hydrotreating. Current and past operations have produced gasoline, diesel fuels, jet fuels, kerosene, propane, butane, and residual fuel.

(6) Specifications of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous waste or hazardous constituents in the wastes;

The refinery laboratory analyzed both hydrocarbon and water samples. The materials that were generated in the laboratory can be categorized as follows:

- *spent/unused hydrocarbon samples;*
- *spent/unused wastewater samples;*
- *discharges from sinks in the laboratory; and*
- *discharges from bottle washing systems in the laboratory.*

The spent/unused hydrocarbon samples were normally disposed of in segregated drums located outside the laboratory. These drums contents were picked up periodically by a vacuum truck in the refinery and sent to the refinery slop system. The wastewater samples were discharged to the sewer and through the API separator prior to discharge to the wastewater treatment plan.

Discharges from the sinks in the laboratory were routed to the wastewater treatment plant via the API separator. With improvements in best management practices, care was taken to not discharge various chemicals or reagents (such as nitrobenzene) that would have caused problems in the wastewater treatment plants. Chemicals or reagents that could upset a wastewater treatment plant were managed separately, for example, disposed of in a separate drum and sent off-site for disposal.

(7) All available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s) (to include ground water data, soil analyses, air, and surface water data).

On October 26, 2005 two glass jars of cuprous chloride were observed in the laboratory building to be leaking. Cuprous chloride is a white to greyish crystalline powder and has a very low solubility in water. It is used as a desulfurizing agent in the refinery industry. The area of the spill was cleaned up, the leaking containers were properly disposed of, and the spilled material was placed in over-pack containers. The over-pack containers were shipped off-site for proper disposal. This area was already addressed and is acknowledged in NMED's letter on October 25, 2006 that no further action is required.

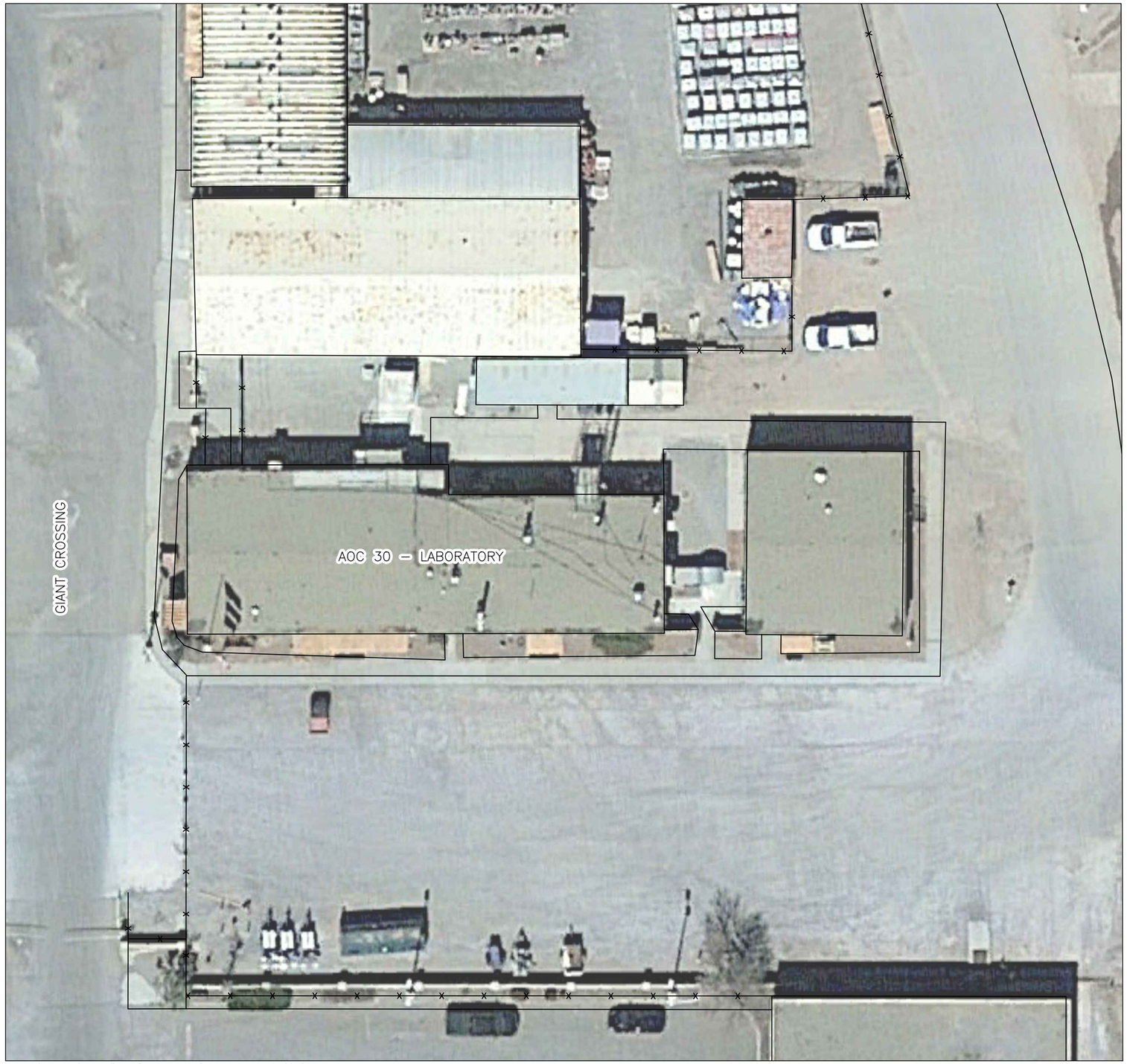

Image Citation: Google Earth Pro Imagery, Publication: March 2016.

EXPLANATION

FENCE

BUILDING OR OTHER STRUCTURE

AOC AREA OF CONCERN

N

0 30'

Trihydro CORPORATION
1252 Commerce Drive
Laramie, Wyoming 82070
www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729

FIGURE 1

AOC 30 - LABORATORY

MARATHON PETROLEUM CORP.
GALLUP REFINING DIVISION
GALLUP, NEW MEXICO

Drawn By: REP	Checked By: CF	Scale: 1" = 30'	Date: 10/23/20	File: 697-AOC-30

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