



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**



**ENTERED**



**Hazardous Waste Bureau**

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**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

December 14, 2020

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

**RE:    RESPONSE TO APPROVAL WITH MODIFICATIONS  
      RESPONSE ACTION REPORT DGS 105 ADDITIVE TANK – RAIL CAR LOADING AREA –  
      GASOLINE RELEASE  
      WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
      EPA ID # NMD000333211  
      HWB-WRG-20-004**

Dear Mr. Moore:

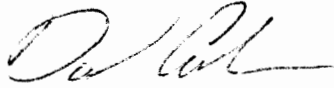
The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Response Action Report DGS 105 Additive Tank – Rail Car Loading Area – Gasoline Release* (Response), dated November 15, 2020, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED is providing additional comments based on the Response.

The Permittee must address all comments in the attachment and submit a response letter no later than **January 31, 2021**.

Mr. Moore  
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If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-476-6046.

Sincerely,



Dave Cobrain  
Program Manager  
Hazardous Waste Bureau

cc: M. Suzuki, NMED HWB  
C. Chavez, OCD  
L. King, EPA Region 6 (6LCRRC)

File: Reading File and WRG 2020 File

Attachment

Mr. Moore  
December 14, 2020  
Attachment Page 1 of 1

**Comment 1**

The Permittee's response to NMED's Comment 1 states, "[b]ased on laboratory data only 6% of the available pore space contained total petroleum hydrocarbon-gasoline range organics (TPH GRO) which was the released product." It is not clear how the gasoline saturation level (6%) was estimated from the laboratory data. In the response letter, provide referenced laboratory data and present the calculation used to estimate the gasoline saturation level.

**Comment 2**

The Permittee's response to NMED's Comment 2 states, "[t]he Investigation Work Plan for the Rail Car Loading Area (IWP) will be submitted by December 31, 2020." The proposed submission date for the investigation work plan is hereby approved. The Permittee must submit the work plan no later than **December 31, 2020**, as stated.

**Comment 3**

The Permittee's response to NMED's Comment 5 states, "[b]ecause access beneath the pipelines is limited, [the soil boring] locations may need to be located outside the pipe rack extents." If the soil borings need to be located outside the pipe rack, the locations must be selected downgradient of the pipe rack and/or in topographically low areas where released gasoline could potentially accumulate. Include the provision in the work plan required by Comment 2 above.