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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 21, 2020

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

**RE: APPROVAL WITH MODIFICATIONS
FLARE KOD PUMP SODIUM HYDROXIDE RELEASE INVESTIGATION WORK PLAN
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-20-020**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Flare KOD Pump Sodium Hydroxide Release Investigation Work Plan* (Work Plan), dated November 30, 2020, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications with the following comments.

Comment 1

In the Scope of Activities Section, *Field Screening*, page 6 of 10, the Permittee states, "the sample will also be wetted, and a field pH will be taken." Appendix A, *Standard Operating Procedure – Soil Sampling*, indicates that a soil pH meter will be used for field screening and calibrated according to manufacturer's recommendations. Provide a more detailed description of the pH screening procedures in a response letter.

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In addition, the soil pH meter used for this investigation must be capable of reading pH values above 12.5. One of the calibration points must include pH greater than 12.5 and the linearity of the calibration curve must be demonstrated for the instrument. Otherwise, EPA Method 9045D must be used for soil pH measurement. In this case, a low-sodium-error electrode must be used to compensate for inaccurate readings associated with very high pH that may be present in the areas where sodium hydroxide was released. Include the provision in the revised Work Plan and provide replacement pages, as appropriate.

Comment 2

In the Investigation Method Section, *Sample Collection Procedures*, page 7 of 10, the Permittee states, “[s]amples will be collected in accordance with the soil sampling Standard Operating Procedure (SOP) (Appendix A) and screened in accordance with the soil screening SOP (Appendix B).” Appendix B is not included in the Work Plan. Resolve the discrepancy and provide replacement pages.

Comment 3

The Data Quality and Validation Section, page 9 of 10, provides a detailed description of quality assurance and quality control criteria. However, the criteria are presumed to be only described for total petroleum hydrocarbons analyses. Quality assurance and quality control related to pH measurements are equally important for this investigation. Accordingly, include a description of such criteria for pH measurement in the revised Work Plan and provide replacement pages.


The Permittee must address all comments above and submit a response letter, replacement pages, and an electronic version of the revised Work Plan no later than **April 30, 2021**.

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 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