



*Michelle Lujan Grisham*  
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 **ENTERED**

**NEW MEXICO  
ENVIRONMENT DEPARTMENT  
Hazardous Waste Bureau**

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*James C. Kenney*  
Cabinet Secretary

*Jennifer J. Pruett*  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 4, 2021

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

**RE: RESPONSE TO COMMENTS 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 Comments Approval with Modifications Response Action Report DGS 105 Additive Tank - Rail Car Loading Area - Gasoline Release (Response), dated February 26, 2021, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues the following comment.

**Comment 1**

The Permittee’s response to NMED’s Comment 1 states, “[t]he 6% TPH-GRO pore space value was calculated in three steps. The TPH-GRO, TPH-DRO, and TPH-MRO concentrations were averaged based on the data from the three samples collected for waste characterization (Attachment A). Next, the total TPH concentration was calculated by summing the average TPH-

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GRO, TPH-DRO, and TPH-MRO concentrations. Then, the average TPH-GRO value (698 mg/kg) was divided by the sum of TPH values (12,095 mg/kg). The resulting value is 6% TPH-GRO. This value assumes that the pore space is saturated and that the TPH values represent 100% of the hydrocarbon in the soil pore space.”

The calculations are based on the incorrect assumption of the TPH values representing 100% hydrocarbon saturation in the pore space. The calculations rather represent the fraction of gasoline range organics in total petroleum hydrocarbons. In order to estimate TPH saturation in soil pore space, porosity and density of the soil and specific gravity of the hydrocarbons must be taken into account; otherwise, a discussion associated with TPH saturation level must not be included in future reports as it is misleading. No response required.

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 2021 File