



MICHELLE LUJAN GRISHAM
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Certified Mail - Return Receipt Requested



April 5, 2022

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS
ANNUAL GROUNDWATER MONITORING REPORT GALLUP REFINERY – 2019
WESTERN REFINING SOUTHWEST LLC, GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID # NMD000333211
HWB-WRG-20-013**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Annual Groundwater Monitoring Report Gallup Refinery - 2019* (Response), dated December 17, 2021 and received on December 21, 2021, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest LLC, Gallup Refinery (the Permittee). NMED hereby issues the following comments regarding the Permittee's response.

Comment 1

The Permittee's Response to Comment 6 from NMED's September 28, 2021 letter states, "[i]n-situ measurement tools are not feasible when hand-bailing from groundwater monitoring wells at the Refinery. The monitoring wells that are hand-bailed have a maximum diameter of 5 inches. The hand bailer used is chosen based on the diameter of the monitoring well and does not allow for an in-situ probe to be placed in the monitoring well concurrently with the bailing." To clarify, NMED was concerned that the in-situ water quality parameters were collected at the same time the groundwater was being bailed based on the erratic water quality measurements from the annual groundwater monitoring report. In-situ water quality parameters should be collected immediately after bailing has been completed as part of sample collection. The Permittee must evaluate whether the erratic water quality measurements associated with hand-bailing can be resolved by using downhole probes/sondes. Propose to use in-situ measurement tools for wells where bailers are used for purging in the upcoming groundwater monitoring work plan, as appropriate.

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
Telephone (505) 476-6000 - www.env.nm.gov

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Comment 2

The Permittee's Response to Comment 13 from NMED's September 28, 2021 letter states, "[t]he work plan [to investigate whether the secondary containment wall of the NAPIS bays is still intact] will be submitted no later than March 31, 2022." NMED acknowledges that the work plan will be submitted to NMED no later than **March 31, 2022**. No response is required.

Comment 3

The Permittee's Response to Comment 23 from NMED's September 28, 2021 letter states, "[s]ee response to Comment 9." The response to Comment 9 does not adequately address Comment 23; therefore, it is not appropriate to cite Comment 9 as a response. Comment 23 must be addressed in the work plan referenced in Comment 2 above. No response is required.

If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-690-6930.

Sincerely,

Rick Shean

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Shean
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Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
M. Suzuki, NMED HWB
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H. Jones, Trihydro

File: Reading File and WRG 2022 file