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Certified Mail - Return Receipt Requested

April 12, 2022

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

**RE: APPROVAL WITH MODIFICATIONS
RESPONSE TO DISAPPROVAL
SOUR NAPHTHA RELEASE INVESTIGATION WORK PLAN
WESTERN REFINING SOUTHWEST LLC, GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID # NMD000333211
HWB-WRG-21-014**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has completed its review of the Marathon Petroleum Company dba Western Refining Southwest LLC, Gallup Refinery (the Permittee) *Response to Disapproval Sour Naphtha Release Investigation Work Plan* (Response), dated January 25, 2022 and received on February 9, 2022. NMED has reviewed the Response, and hereby issues this Approval with Modifications with the following comments.

Comment 1

The Permittee's response to NMED's Disapproval Comment 2 states, "[b]ased on the SDS for Sour Naphtha (Attachment C), it is unlikely that volatile organic compounds separate of [BTEX] will be present in the soil caused by the sour naphtha release. This investigation is based on the sour naphtha release and will be focused on the extent of contamination caused by the release. Therefore, Marathon does not agree to include additional analytical information for the soil borings." It is possible that the soils in the area where the sour naphtha release occurred may have been affected by other historical releases. The *Marketing Tank Farm Laser-Induced Fluorescence/Hydraulic Profiling Investigation Report Addendum*, dated November 2021 reported that diesel and/or gasoline signature were detected in borings MKTF-LIF-83, MKTF-LIF-84, MKTF-LIF-86, and MKTF-LIF-87. Since borings MKTF-LIF-83, MKTF-LIF-84, MKTF-LIF-86, and MKTF-LIF-87 were advanced in the overlapping area where multiple soil borings are proposed to be installed for the delineation of the sour naphtha release, the Permittee must also

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
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investigate the presence/absence of potential contamination associated with the detection of gasoline and/or diesel signature. Revise the Work Plan to include the VOC analysis with all of the constituents listed in EPA Method 8260B, total petroleum hydrocarbons gasoline (TPH-GRO), diesel (TPH-DRO), and motor oil range organics (TPH-MRO) and provide replacement pages that include the additional analysis in the appropriate section(s) of the Work Plan. If the Permittee chooses not to include the additional analysis with investigation, then the Permittee will be required to submit a separate work plan for investigating the presence/absence of potential contamination associated with the detection of gasoline and/or diesel signature from the MKTF investigation and additional borings will need to be advanced at the site.

Comment 2

The Permittee's response to NMED's Disapproval Comment 10 states, "[t]he soil samples will not be compared to residential soil screening levels because the investigation will not require clean closure." For perspective, the Permittee must list residential screening levels in addition to industrial and construction worker screening levels for comparison regardless of the site cleanup objectives.

The Permittee must address all comments in this Approval with Modifications and submit the required response letter and replacement pages to NMED no later than **June 3, 2022**.

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.

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

Sincerely,

Rick Shean

Digitally signed by Rick
Shean
Date: 2022.04.12
10:32:17 -06'00'

Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
M. Suzuki, NMED HWB
L. Barr, EMNRD OCD
L. King, EPA Region 6 (6LCRRC)

File: Reading File and WRG 2022 file