



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY



Certified Mail - Return Receipt Requested

April 19, 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 BORROW PIT INTERCEPTOR SUMPS
INSTALLATION SUMMARY LETTER
WESTERN REFINING SOUTHWEST LLC, GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID # NMD000333211
HWB-WRG-21-010**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) is in receipt of the Marathon Petroleum Company dba Western Refining Southwest LLC, Gallup Refinery (Permittee) *[Response to Approval with Modifications Borrow Pit Interceptor Sumps Installation Summary Letter (Response)]*, dated December 15, 2021 and received on December 22, 2021. NMED has reviewed the Response, and hereby issues this letter with the following comments.

Comment 1

The Permittee's response to NMED's Approval with Modifications Comment 2 states, "[t]wo soil borings will be installed north of S-1 to further define the extent of [phase separated hydrocarbons] PSH north of S-1. The borings will be placed between S-1 and the toe of the borrow pit slope (a distance of approximately 100 ft). The borings will be 40 to 50 ft apart, with the first boring approximately 40 ft north of S-1. If [separate phase hydrocarbons] SPH is indicated within a boring, that boring will be converted into a 4-inch diameter recovery sump that will be added to the routine vacuum truck recovery schedule. If SPH is not detected, the borings will be converted into piezometers to enable groundwater monitoring in the area." NMED concurs with the Permittee's recommendations for situations where SPH is present within the boring; however, the proposed schedule for implementation of the field work was not included with the response. Although submittal of a work plan is not necessary to install the borings, the Permittee must provide a proposed schedule for implementation of the field work in a response letter and must notify NMED prior to beginning installation activities in

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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

Mr. Moore
April 19, 2022
Page 2

accordance with Permit Section IV.J.

Comment 2

The Permittee's response to NMED's Approval with Modifications Comment 5 describes the methods used to measure the recovered volume of SPH from the wells and the Borrow Pit. The Permittee initially estimated the recovered volume of SPH from the saturated thickness within each well, including both the volume in the well casing and the volume in the well filter pack between the 2-inch casing radius and the 7-inch boring radius; however, this method is not an accurate estimate of the recovered volume of SPH. A new estimation method was implemented in November 2021 and fluids from the Borrow Pit recovery activities were collected exclusively into a tote that enabled a more accurate estimation of recovered SPH and groundwater. It must be noted that the recovery data collected prior to November 2021 for the Borrow Pit is not accurate due to the incorrect estimation method. Remove the data collected prior to November 2021 from future submittals.

The Permittee must address all comments in this letter and submit the required response letter to NMED no later than **June 30, 2022**.

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: 2022.04.19 08:35:54
-06'00'

Rick Shean
Chief
Hazardous Waste Bureau

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

File: Reading File and WRG 2022 file