



 **ENTERED**

Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39
Jamestown, NM 87347

Received
JUN 15 2022
NMED Hazardous Waste Bureau

June 6, 2022

Mr. Kevin Pierard, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

**RE: Approval with Modifications
Borrow Pit Interceptor Sumps Installation Summary Letter
Western Refining Southwest LLC, Gallup Refinery
EPA ID #NMD000333211
HWB-WRG-21-010**

Dear Mr. Pierard:

Attached please find the response to comments contained in the New Mexico Environment Department (NMED) above referenced Approval with Modifications letter dated April 19, 2022.

If you have any questions or comments regarding the information contained herein, please do not hesitate to contact Mr. John Moore at (505) 879-7643.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction of supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,
Western Refining Southwest LLC, Gallup Refinery

Ruth A Cade

Ruth Cade
Vice-President

Attachments

cc: D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
L. Barr, NMED OCD
L. King, EPA Region 6

M. Bracey, Marathon Petroleum Corporation
K. Luka, Marathon Petroleum Corporation
J. Moore, Marathon Gallup Refinery
H. Jones, Trihydro Corporation

ATTACHMENT 1
RESPONSE TO COMMENTS

New Mexico Environment Department (NMED) to Western Refining Southwest LLC, Gallup Refinery (Refinery) Comment Letter “Approval with Modifications, Borrow Pit Interceptor Sumps Installation Summary Letter” (April 19, 2022)

NMED Comment	Refinery Response
Comment 1:	Response 1:
<p>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 extend 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 piezometer 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 filed 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 accordance with Permit Section IV.J.</p>	<p>A proposed schedule will be provided to NMED in advance of future field activities.</p>

New Mexico Environment Department (NMED) to Western Refining Southwest LLC, Gallup Refinery (Refinery) Comment Letter “Approval with Modifications, Borrow Pit Interceptor Sumps Installation Summary Letter” (April 19, 2022)

NMED Comment	Refinery Response
Comment 2:	Response 2:
<p>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.</p>	<p>The Borrow Pit recovery data collected prior to November 2021 will be removed from future submittals.</p>