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Certified Mail - Return Receipt Requested

June 29, 2022

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

**RE: APPROVAL WITH MODIFICATIONS
[REVISED] 2020 ANNUAL GROUNDWATER MONITORING REPORT
WESTERN REFINING SOUTHWEST LLC, GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID # NMD000333211
HWB-WRG-21-012**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has completed its review of Marathon Petroleum Company dba Western Refining Southwest LLC, Gallup Refinery (the Permittee's) *[Revised] 2020 Annual Groundwater Monitoring Report* (Report), dated March 11, 2022 and received on March 16, 2022. NMED hereby issues this Approval with Modifications with the following comments.

Comment 1

In the response to NMED's Disapproval Comment 3, the Permittee states, "[i]t should be noted that previous annual reports have presented the fluid level depth to water from the measuring point." Prior to receiving the revised Tables, NMED used the ground level elevation, well casing rim elevation, groundwater elevation, and stick-up length from previous reports (e.g., 2019 Report) to determine that the fluid level (depth to water) was reported as a unit of feet below well casing rim even though it was not described in the Report or noted in the tables. All fluid levels were correctly reported as a unit of ft bgs in the revised Report, as directed. No revision or response is required.

Comment 2

In the response to NMED's Disapproval Comment 10, the Permittee states, "[c]urrently, the recovery systems are no longer active and have been removed." NMED was not aware that the

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groundwater recovery systems were decommissioned. The Permittee must notify NMED prior to making such decisions in the future. Submit a letter report that summarizes decommissioning activities and the basis for removal of the systems (e.g., change in extent of contaminant plumes) no later than **September 16, 2022**.

Comment 3

In the response to NMED's Disapproval Comment 26, the Permittee states, "[t]he VOC data were rejected because VOCs were analyzed outside of the method holding time of 7 days [and a] summary of this explanation is provided in Appendix D3." Appendix D3 contains multiple documents. The titles of the documents do not allow readers to easily find the pertinent information. In future groundwater monitoring reports, revise the titles of the documents in Appendix D3 in a manner that allows readers to easily locate pertinent information or provide a *Table of Contents* in the beginning of Appendix D3 to aid reviewers. The same issue is found in Appendix C that contains multiple laboratory reports. Revise the titles of the documents in Appendix C or provide a *Table of Contents* listing all the wells with links to the relevant lab report and a page listing in the beginning of Appendix C in future groundwater monitoring reports. No revision is required to the Report.

Comment 4

In the response to NMED's Disapproval Comment 29, the Permittee states, "[a] note has been added to Table 3-1 and Appendix B-1 to describe the change and the explanation." Although the error identified in Table 3-1 was corrected, Appendix B-1 remained uncorrected and the Permittee did not include an explanation as stated in the response to Comment 29. Although no revision is required to the Report, Appendix B-1 must be revised appropriately in future reports.

Comment 5

In the response to NMED's Disapproval Comment 30, the Permittee states, "[c]ommon information shared between the two tables are the sample location and frequency. The Refinery proposes to consolidate the two tables into one in future reports." NMED concurs with the Permittee's proposal of consolidating the two tables into one in future reports. No revision is required to the Report.

The Permittee must address all comments contained in this Approval with Modifications in future annual groundwater monitoring reports and a letter report required by Comment 2 must be submitted to NMED no later than **September 16, 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.

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

Sincerely,

Rick
Shean
Rick Shean

Digitally signed by
Rick Shean
Date: 2022.06.29
13:25:54 -06'00'

Chief
Hazardous Waste Bureau

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

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