



State of New Mexico  ENTERED
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

September 21, 2018

Jessica L. O'Brien
Environmental Supervisor
Western Refining, Southwest Inc., Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

**RE: APPROVAL WITH MODIFICATIONS
REVISED FACILITY-WIDE GROUND WATER MONITORING WORK PLAN –
UPDATES FOR 2018
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-18-002**

Dear Ms. O'Brien:

The New Mexico Environment Department (NMED) has reviewed the *Revised Facility-Wide Ground Water Monitoring Work Plan – Updates for 2018* (Work Plan) dated July 2018, submitted on behalf of Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments provided by both NMED and the New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division (OCD).

Comment 1

The Permittee submitted one hard copy and one electronic version of the revised Work Plan. RCRA Permit Section II.C.7 (Submissions to the Environment Department) requires that two hard copies and an electronic version of submittals must be submitted to NMED. The Permittee submitted another hard copy of the revised Work Plan on August 24, 2018. The submission due date was July 31, 2018. All required documents must be submitted on or before the due date to comply with the Permit. The Permittee must seek an extension of time in accordance with the Permit Section I.J.12. In addition, the Permittee did not submit an electronic version of the

response to NMED comments (RTC). The Permittee must submit an electronic version of the RTC no later than **October 12, 2018**.

Comment 2

The Permittee's response to NMED's *Disapproval* Comment 2 states that an entry was added to Table 2 to note SVOC analyses were previously removed in 2016 pursuant to the July 24, 2015 approval. A note in Table 2 states, "[p]ursuant to NMED's July 24, 2015 Approval with Modifications, SVOC analyses were previously discontinued with the addition of ORO and DRO-extended." The correct analysis required is GRO, rather than ORO. Revise the note in the table and provide a replacement table.

Comment 3

The Permittee's response to NMED's *Disapproval* Comment 10 states, "[s]ulfate, iron, phenol, and tetrachloroethene (PCE) have been detected above screening levels [in PW wells]." The tetrachloroethene concentration in the groundwater sample collected from well PW-2 was detected above the screening level in October 26, 2011; however, the detection was likely false-positive because the field blank was contaminated during the sampling event. In addition, PCE was not detected during the successive sampling events conducted on December 15, 2011 and September 10, 2014. The Permittee is not required to discuss the PCE detection in PW-2 in future reports or work plans. No response is necessary.

Comment 4

The Permittee's response to NMED's *Disapproval* Comment 13 states that the NMED's direction to "[c]orrect the statements in the revised 2018 Work Plan" is somewhat vague as to exactly which statement NMED is referring. The NMED is referring to the Permittee's statements quoted in NMED's Comment 13. The referenced statements were "[r]ecovery through hand-bailing continues on a quarterly basis indicating that the volume of SPH has continued to drop substantially from year to year in several of these recovery wells. In 2016, only Recovery Well (RW-1) and GMW-1 had measurable levels of hydrocarbons." The Permittee's statement that separate phase hydrocarbon (SPH) dropped substantially is not accurate because SPH measurements may not accurately reflect site conditions as pointed out in NMED's *Disapproval* Comment 13. The Permittee revised Section 2.4.1.1, *Main Tank Farm*, to change "continued to drop substantially" to "declined" which also is not accurate. Include a statement noting the fact that SPH measurements may not accurately reflect site conditions and provide a replacement page.

Comment 5

The Permittee's response to NMED's *Disapproval* Comment 14 states, "[w]e assume per NMED's comment the wells are approved for inclusion." To clarify, NMED approves inclusion of wells OW-53, OW-54, OW-55, OW-56, OW-57 and OW-58 in the groundwater monitoring schedule. No response is necessary.

Comment 6

The Permittee's response to NMED's *Disapproval* Comment 19 states, "[t]he discussion in Section 4.1.2 has been revised to specify DO to be reported in mg/l..." The revision has not

been addressed in Appendix A, *Gallup Field Sampling Collection and Handling Standard Procedures*. Revise the units for DO reporting in Appendix A and provide the appropriate revised replacement page.

Comment 7

The Permittee's response to NMED's *Disapproval* Comment 21 states, "[t]he references to nitrates in Section 4.2.1, Appendix A and Appendix B – Table 1 have been changed to nitrate and nitrite." According to Appendix B – Table 1, the change was only addressed in the PW wells. It should be noted that the change (inclusion of nitrite analysis) in the analytical suite applies to all monitoring wells where anions are included as a sampling requirement. No response is necessary.

Comment 8

The Permittee's response to NMED's *Disapproval* Comment 24 states, "[t]he rationale refers to the fact that the particular well is a "new well". On multiple previous occasions, NMED has specified that all new monitoring/observation wells should be included in the Monitoring Plan and thus Permittee included the new wells... We do not understand how the rationale to add new wells could possibly be ambiguous based on the history of this requirement." To clarify, the intent of Comment 24 is not to change or remove the requirement to add new wells to the Monitoring Plan. Comment 24 states, "[a]ll proposed monitoring schedule and modifications must be discussed." Accordingly, the Permittee made a revision to Section 6.1, *Requests for Modifications to Sampling* to provide information regarding why these new wells (BW-4A, BW-4B, BW-5A, BW-5B, BW-5C, OW-59, and BW-60) are added to the Monitoring Plan by referencing NMED and OCD directives. The references provide the rationale for the new wells. Consequently, Comment 24 was appropriately addressed in the revised Work Plan. However, simply stating that a rationale for adding a well to the Monitoring Plan because the well is new lacks detail with regard to reasons for installation. No response is necessary.

Comment 9

The Permittee's response to NMED's *Disapproval* Comment 26 states, "Appendix B Tables 1 and 2 have been revised to add analyses by method 8011 for OW-13, OW-50, OW-52, NAPIS-3, OAPIS-1, and MKTF wells MKTF-01, 04, 18, 19, 23, 27, 33, 34, 40 and 42." The revision was not made for OAPIS-1 in Table 1. Provide a replacement table that addresses the revision for OAPIS-1.

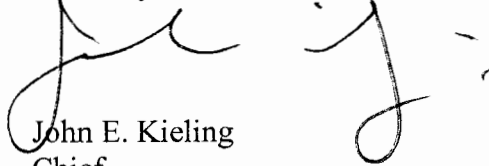
Ms. O'Brien
September 21, 2018
Page 4

The Permittee must submit an electronic version of the RTC required by Comment 1 no later than **October 12, 2018**. Address all other comments in this Approval with Modifications in a separate response letter. Provide replacement pages and tables, where applicable. Additionally, an electronic version of the Work Plan that includes replaced pages and tables must be submitted to NMED. The response letter, replacement pages and tables, and electronic version of the updated Work Plan must be submitted to NMED no later than **November 30, 2018**.

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 Approval with Modifications, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: K. Van Horn NMED HWB
M. Suzuki NMED HWB
C. Chavez OCD
L. King EPA Region 6

File: Reading File and [REDACTED] File
HWB-WRG-18-002