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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

July 10, 2019

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

**RE: APPROVAL WITH MODIFICATIONS  
[REVISED] INVESTIGATION WORK PLAN  
SANITARY LAGOON  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-18-004**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Investigation Work Plan Sanitary Lagoon* (Work Plan), dated May 2018 revised October 2018 and further revised June 2019, submitted on behalf of Marathon Petroleum Corporation dba Western Refining, Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

**Comment 1**

The Permittee's response to NMED's January 31, 2019 Disapproval (Disapproval) Comment 1 states, "[w]e reviewed Figure 5 Sanitary Lagoon Proposed Soil Boring Locations Adjacent to Pipeline and it does show the excavated area south of the lagoon. Possibly the comment was meant to refer to Figure 2, which has now been expanded to the south to include all of the area that was previously excavated south of the lagoon." The location of the excavated area is not clear from the provided figures. The boundary of the area(s) where the pipeline was previously excavated or exposed must clearly be marked in a figure in the investigation report.

**Comment 2**

The Permittee's response to Disapproval Comment 2 states, "[a]s referenced in Comment 3 below, the concern was related to potential collapse of the trench while field personnel were present attempting to collect samples from beneath the pipeline. The Work Plan has been revised in Section 4.1 to include collection of samples from below the pipeline using a large number of trenches along the pipeline." Figure 5 (Sanitary Lagoon Proposed Soil Sample Locations Beneath the Pipeline) indicates that an installation of the trenches is proposed in the area where the pipeline was previously exposed. However, rather than excavating new trenches along the section where the pipe was already exposed, the Permittee may use a backhoe or trackhoe to remove soil from within the existing trench, re-expose the pipe and collect soil samples from below the pipe from the soils in the trackhoe bucket for laboratory analysis. See also Comment 3.

**Comment 3**

The Permittee's response to Disapproval Comment 3 states, "[t]he pipeline does not appear to be visible and this comment appears to be superseded by Comment 10 below, which directs Gallup to install new trenches every 50 feet instead of the proposed soil borings. The discussion to use a backhoe is included below pursuant to Comment 10." Disapproval Comment 10 does not supersede Disapproval Comment 3. If the trench is open but the pipeline is no longer visible, scrape the excavation sidewall to expose the pipe so that the trackhoe may be used to collect a sample below the pipe without excavating a trench (see Comment 2, above). The proposal for a collection of soil samples below the pipe with an increment of every 50 feet is still required; however, an installation of the trenches in the area where the pipeline was previously exposed need not be performed. The intent of Comment 3 is for the Permittee to collect samples from the open trench using a trackhoe bucket rather than to advance angled borings to collect samples. In the area where the pipeline was not previously exposed, excavate trenches perpendicular to the pipeline and collect soil samples below the pipe by backhoe or trackhoe as directed by Disapproval Comment 10.

**Comment 4**

In Section 4.1.3 (Drilling Activities) the Permittee states, "[t]he soil sampling will be conducted using a decontaminated hand auger, if possible, once the excavation reaches the target depth beneath the pipeline. If the sample cannot be directly obtained with a hand auger, then a discrete sample will be collected directly from the trackhoe bucket." Samples must be collected using the trackhoe bucket or if personnel can safely enter the trench then use an Encore sampler or equivalent, as appropriate.

**Comment 5**

In Section 4.1.3 (Drilling Activities) the Permittee states, "[k]nown site features and/or site survey grid markers will be used as references to locate each boring. The boring locations will be measured to the nearest foot and locations will be recorded on a scaled site map upon completion of each boring." RCRA Permit Section also requires that the Permittee collect information regarding "[s]ite attributes (e.g., soil sample locations, sediment sample locations, pertinent structures, as well as staked out sampling grids), shall be located by using the global positioning system (GPS), another the NMED-approved surveying system, or by using a registered New Mexico Registered Land Surveyor using the methods described in the paragraph above. If using

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GPS, horizontal locations shall be measured to the nearest 0.5 ft.” Ensure that this information is collected and reported in the investigation report.

**Comment 6**

In Section 4.1.4 (Groundwater Sample Collection) the Permittee states, “[t]he temporary well completions installed in the soil borings within the Sanitary Lagoon will be developed and then left to stabilize for at least two weeks to allow separate phase hydrocarbon (SPH) to enter the well casing.” After further consideration the Permittee may leave boreholes with temporary wells installed open for 48 hours rather than two weeks.

**Comment 7**

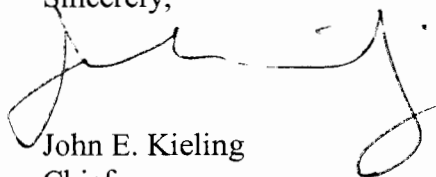
In Section 4.1.9 (Chemical Analyses) the Permittee proposes analytical sampling using SW-846 Method 8260 and 8270 for Skinner List volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). The use of the Skinner List in this case is inappropriate since the waste water entering the sewage lagoon potentially contained constituents such as solvents, which are not included in the Skinner List. Ensure that the chemical analyses for soil and groundwater include the full suite of VOCs and SVOCs.

This Approval with Modifications 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.

The Permittee must submit an Investigation Report that summarizes the results of the implementation of the Work Plan for NMED review no later than **February 28, 2020**.

If you have questions regarding this letter, 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  
D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
C. Chavez, OCD  
L. King, EPA Region 6

File: Reading File and WRG 2019 File  
HWB-WRG-18-004