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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

September 20, 2019

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

**RE: RESPONSE TO COMMENTS
APPROVAL - HYDROCARBON SEEP INTERIM MEASURES 2019 SECOND QUARTER
STATUS REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-19-014**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Comments Approval - Hydrocarbon Seep Interim Measures 2019 Second Quarter Status Report* (Response), dated September 5, 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). The Permittee must address the following comments.

Comment 1

NMED's *Approval* dated August 23, 2019 requires the Permittee to provide the information regarding the difference between RO reject water and boiler water. The Response provides a detailed explanation regarding the RO reject water. However, it is not clear whether the boiler water, described in the *2019 Facility-Wide Groundwater Monitoring Plan*, refers to the purified, raw, condensate water or the same RO reject water. Clarify the definition of the boiler water that was historically discharged to Pond EP-2.

Comment 2

The Permittee's Response under the heading "Difference between RO Reject Water and Boiler Water" states, "[t]he heated condensate is then sent to a cooling tower for conversion back to water." Explain the fate of the heated condensate that is cooled down and converted to water. In addition, identify any chemicals used to prevent scaling. Provide the information in a response letter.

Comment 3

The Permittee's Response under the heading "History of RO Reject Discharge to Pond 9" states, "[t]his brings us to the current day where the RO Reject is again discharged to Pond 9 while design is currently being conducted for total replacement. Once the replacement installation is completed (anticipated in 2nd or 3rd quarter of 2020), it is anticipated that the remainder of the line will be abandoned, and the new line will carry the RO reject water to pond STP-1." Clarify whether the Permittee currently has an approval from New Mexico Department of Energy, Minerals, and Natural Resources (EMNRD) Oil Conservation Division (OCD) to use evaporation ponds (e.g., EP-9) for the discharge of the RO reject water. Additionally, it is not clear whether EMNRD OCD has agreed to the direct discharge of the RO reject water to Pond STP-1 because wastewater treatment process associated with Pond STP-1 does not reduce the concentrations of constituents (e.g., chloride and sulfate) in the RO reject water. Clarify whether the Permittee has an approval from EMNRD OCD to route the RO reject water to Pond STP-1.

The Permittee must address all comments in this letter and submit a response letter. The response letter must be submitted to NMED no later than **November 1, 2019**.

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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 (6LCRRC)
B. Moore, WRG

File: Reading File and WRG 2019 File
HWB-19-014

