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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



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Deputy Secretary

October 18, 2019

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

**RE: APPROVAL WITH MODIFICATIONS
SECOND RESPONSE TO COMMENT NO. 39 ON 2017 ANNUAL GROUND WATER
MONITORING REPORT (DATED MARCH 21, 2019)
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-18-014**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Second Response to Comment 39 on 2017 Annual Ground Water Monitoring Report (dated March 21, 2019)* (Response), dated August 23, 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

The Permittee's response to NMED's Comment 1 states, "[t]he discharge of hydrocarbon from the drain line to the STP-1 French drain was discovered on February 6, 2018." Four figures are included in the Response; however, three of the figures do not have titles. On the first figure, the location of the STP-1 French drain is identified; however, the location of the drain line is not identified. Identify the location of the drain line in relation to the location of the STP-1 French drain in a revised figure.

Comment 2

The second paragraph on page 2 of the Permittee's response to NMED's Comment 1 states, "[e]xcavations #4, #5, and #8 were completed with a backhoe along the west end of the tank farm and no evidence of hydrocarbons was encountered in these locations, but groundwater was not reached in these excavations." Provide the depth and dimension of the excavations in a response letter. Also, provide the depth and dimension of excavations #6, #7, #9, #10, and #11.

Comment 3

The second paragraph on page 2 of the Permittee's response to NMED's Comment 1 states, "[e]xcavations #9 and #10 were completed between the wastewater treatment plant and STP-1. Hydrocarbon[s] were observed in excavation #9." The presence or absence of hydrocarbons in excavation #10 is not discussed in the Response. Since hydrocarbons were observed in boreholes BH #1, #2, and #3 and excavation #9, hydrocarbons may have also been present in excavation #10. Identify the presence or absence of hydrocarbons in excavation #10 in the response letter.

Comment 4

The western, northern and southern extent of the hydrocarbon contamination is not delineated. Hydrocarbons were observed in borehole BH #3, which was installed farthest to the west of the test pits and boreholes. More boreholes should have been advanced west of borehole BH #3 to define the western extent of the contamination since borehole BH #3 contained hydrocarbons. Similarly, hydrocarbons were observed in borehole BH #1, which was installed farthest to the north of the test pits and boreholes. Hydrocarbons were also observed in excavation #9. While excavation #7 was installed south of excavation #9 and hydrocarbon was not detected in excavation #7, the distance from excavation #9 to #7 was approximately 500 feet and appears to be too far to determine extent. The Permittee did not delineate the hydrocarbon contamination in soils north of the wastewater treatment plant.

Comment 5

The figure depicting the excavations highlighted excavations #9 and #10 in red and the rest of the excavations in green. Explain the basis for distinguishing the color of these excavations in the response letter.

Comment 6

The second paragraph on page 2 of the Permittee's response to NMED's Comment 1 states, "[t]he SD locations on the map are storm drains." Some of the storm drains are located close to the areas where hydrocarbons were detected. If the presence of hydrocarbons was investigated at the storm drain locations, include the discussion of the observations in the response letter.

Comment 7

The third paragraph on page 2 of the Permittee's response to NMED's Comment 1 states, "[i]n addition to the excavations completed using either a backhoe or hydroexcavation, smaller holes were hand excavated to the east of STP-1 along the natural drainage pathway, where hydrocarbons were encountered at shallow depths (e.g., 3 feet). Hand excavations were also completed on the northwest sides of Tanks 569, 570, 571, and 572, but no evidence of a release was found." The locations of the small excavations were not identified in the figures, revise a figure to depict the locations of the small excavations and indicate the presence or absence of hydrocarbons.

Comment 8

The fourth paragraph on page 2 of the Permittee's response to NMED's Comment 1 states, "[a]s requested, a map of the underground piping is attached. Most all [sic] of the product transfer piping is aboveground with limited exceptions where the pipeline passes through the tank dike walls. Otherwise, only the oily water drain lines are belowground in this area." The source of hydrocarbon contamination in the vicinity of the wastewater treatment plant and the French drain near Pond STP-1 was suggested to be Tank 570 according to the Mr. Brian Moore in a Marathon Petroleum Company email, dated August 1, 2019; however, hydrocarbons were observed in soils above the water table. The distance between the French drain and Tank 570 is more than 1,800 feet. The transport mechanism of hydrocarbons appears to be limited to groundwater flow. Explain why hydrocarbons were observed in soils above the water table in the vicinity of the French drain. The areas where the presence of hydrocarbons was observed may coincide with the location of the underground piping. Discuss whether leaky oily water drain lines may be a secondary source of hydrocarbon contamination in the vicinity of the tank farm and the French drain.

Comment 9

The fifth paragraph on page 3 of the Permittee's response to NMED's Comment 1 states, "[t]he boring [SB-FD-1] was plugged after no water was observed after two days." Boring SB-FD-1 was installed approximately 200 feet north of Pond STP-1 and hydrocarbons were not observed in the boring. The northern extent of hydrocarbon contamination has not reached boring SB-FD-1. However, the soils in closer proximity of the French drain, where hydrocarbons were detected, should have been investigated. No response required.

The Permittee must address all comments in this letter and submit a response letter no later than **December 13, 2019**.

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.

Mr. Moore
October 18, 2019
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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
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File: Reading File and WRG 2019 File