NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 29, 2020

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

RE: APPROVAL WITH MODIFICATIONS
RESPONSE TO APPROVAL WITH MODIFICATIONS
2017 ANNUAL GROUNDWATER MONITORING REPORT
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 *Response to Approval with Modifications 2017 Annual Groundwater Monitoring Report* (Response), dated November 12, 2019 and submitted on behalf of Marathon Petroleum Company 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

NMED's Approval with Modifications Comment 3 states, "[t]he NMED's *Screening Guidance for Human Health Risk Assessments* (Guidance) was updated on February 2019 and the groundwater screening level for unknown oil was revised as 85.8 µg/L. Accordingly, use the updated screening level for DRO and GRO for future reports and work plans." The groundwater screening level for unknown oil was increased from 0.0398 mg/L to 0.0858 mg/L and a groundwater screening level for gasoline (0.0101 mg/L) was established in the 2019 Guidance.

The Report is not required to be revised at this time. However, the Permittee must include the groundwater screening level of 0.0101 mg/L for TPH-GRO in all future reports and work plans.

Comment 2

The Permittee's response to NMED's Approval with Modifications Comment 4, Item a, states, "[w]ells OW-61 through OW-65 were installed in 2018 and a separate Well Installation Report has been prepared as requested." The referenced report will be reviewed as a separate submittal. Comments pertaining to the well installations are not included in this correspondence.

Comment 3

The Permittee's response to NMED's Approval with Modifications Comment 4, Item b, states, "[t]he pumps were placed into operation upon receiving NMED's approval on August 6, 2019. However, problems with automated shutoff valves delayed full operation of the pumps and prevented us from completing any useful recovery tests before the pumps had to be removed from service due to freezing temperatures." The Permittee must submit an interim status report no later than 90 days after the recovery system start up. Include the test results in the interim status report.

Comment 4

The Permittee's response to NMED's Approval with Modifications Comment 4, Item d, states, "[o]n the morning of October 21st, 0.19 feet of SPH was measured in GWM-1 and approximately eight ounces of product [were] removed with a bailer. The fluid levels were measured through the afternoon of October 21st with only 0.02' recovering to the well. By the end of the second day, the product thickness had returned to 0.19'." SPH is persistent in the vicinity of GWM-1. SPH may be migrating downgradient from the aeration lagoons. The downgradient extent of the SPH must be delineated. The Permittee proposed to install a monitoring well halfway between the eastern perimeter of pond EP-2 and well GWM-1 in the *Investigation Work Plan SMW-1 [sic] and GMW-1 [sic] Areas,* dated September 2018. Provide information regarding the current status of the investigation in a response letter.

Comment 5

The Permittee's response to NMED's Approval with Modifications Comment 7 states, "[t]he values in Table 2.1 are correctly labelled and are reported in % dissolved oxygen, which is the units used at the time the measurements were recorded in 2017." The instrument used to collect the dissolved oxygen data was YSI Model 556 MPS Multi Probe System according to the 2017 Report. The manual for the instrument shows the reporting unit for DO readings as mg/L, rather than %DO. Regardless, all future DO data must be reported as mg/L, rather than %DO.

Comment 6

The Permittee's response to NMED's Approval with Modifications Comment 15 states, "MPC desires to submit the discussion in a separate submittal, as NMED notes, the evaluation of

natural attenuation of chlorinated solvents pertains to a much larger area than just in the immediate vicinity of OW-10." NMED concurs with the Permittee's response. In the response letter, provide the date when the discussion will be submitted to NMED.

Comment 7

The Permittee's response to NMED's Approval with Modifications Comment 17 states, "[t]he relationship between % DO and Mg/l is complex involving barometric pressure, salinity and temperature. We refer you to the United States Geological Survey's website for possible methods to make such corrections if NMED desires to pursue this further; https://water.usgs.gov/admin/memo/QW/qw81.11.html and https://water.usgs.gov/admin/memo/QW/qw81.15.html." The referenced websites do not provide the explanation for the relationship between %DO and mg/L. All future DO data must be reported as mg/L, rather than %DO (see Comment 5).

The Permittee must address all comments in this Approval with Modifications and submit a response letter no later than **April 30, 2020**.

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 letter, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,

Kevin Pierard
Chief
Hazardous Waste Bureau

cc: 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 2020 File
HWB-WRG-18-014