



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

January 29, 2020

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS
SECOND RESPONSE TO COMMENT NO. 39 ON 2017 ANNUAL GROUNDWATER
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 *Response to Approval with Modifications Second Response to Comment 39 on 2017 Annual Groundwater Monitoring Report (dated March 21, 2019)* (Response), dated December 9, 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 Approval with Modifications Comment 2 states, "[t]he excavations were completed by the Refinery Maintenance group as a quick temporary measure to assess potential release locations and the excavations subsequently were backfilled without measuring the depth or dimensions." Unless the information regarding the depth and dimensions of the excavations are provided, NMED will not be able to evaluate the viability of

the investigation. During future investigations, ensure data is collected regarding the depth and dimensions of excavations. No response required.

Comment 2

The Permittee's response to NMED's Approval with Modifications Comment 4 states, "[t]he comment is acknowledged and MPC understands the purpose of the work completed at the time was focused on gathering information to help identify the source of the release and there was no immediate effort made to delineate the extent of hydrocarbon in soils." The extent of hydrocarbons associated with the discharge of hydrocarbons from the drain line to the STP-1 French drain must be investigated. Submit a work plan to investigate the extent of hydrocarbons related to the drain line to the STP-1 French drain no later than **June 30, 2020**.

Comment 3

The Permittee's response to NMED's Approval with Modifications Comment 5 states, "[w]e have not been able to confirm what the red and green colors shown on the map represent." The red may represent the presence of hydrocarbons. Although the Permittee's response to NMED's Approval with Modifications Comment 3 states, "[h]ydrocarbons were not present in excavation #10," the figure depicting the excavations highlighted excavations #9 and #10 in red and the rest of the excavations in green. The Permittee must keep all records of findings for future investigations. No response required.

Comment 4

The Permittee's response to NMED's Approval with Modifications Comment 8 states, "[a]dditionally, as the NMED is aware, MPC recently conducted a Laser Induced Fluorescence (LIF) study in the tank farm area in an effort to identify potential sources of hydrocarbons in the subsurface. A report documenting these activities will be provided to the NMED upon completion." Unless the sources of hydrocarbons in the vicinity of the French drain were identified through the LIF study and appropriately documented in the referenced report, the sources of hydrocarbons must be investigated. Submit a work plan to investigate the sources of hydrocarbons no later than **June 30, 2020**, if necessary.

The Permittee must address all comments in this letter and submit a work plan required by Comments 2 and 4 no later than **June 30, 2020**.

Mr. Moore
January 29, 2020
Page 3

If you have questions regarding this Approval with Modifications, 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