



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested



April 19, 2022

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

**RE: APPROVAL WITH MODIFICATIONS
[REVISED] HEAT EXCHANGER BUNDLE PAD INVESTIGATION WORK PLAN
WESTERN REFINING SOUTHWEST LLC, GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID # NMD000333211
HWB-WRG-21-013**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has completed its review of the Marathon Petroleum Company dba Western Refining Southwest LLC, Gallup Refinery's (the Permittee) *[Revised] Heat Exchanger Bundle Pad Investigation Work Plan, Revised February 2022* (Work Plan), dated March 2, 2022 and received on March 11, 2022. NMED has reviewed the Work Plan, and hereby issues this Approval with Modifications with the following comment.

Comment

NMED's Disapproval Comment 2 required the Permittee to expand the soil sample analytical suite because benzene was the only constituent of concern (COC) being analyzed. In the response to NMED's Disapproval Comment 2, the Permittee states that "[t]he constituent list has been modified throughout the work plan to incorporate other commonly detected constituents at MKTF-16 as well as indicator compounds/main risk drivers with respect to migration to groundwater." The Permittee expanded the constituent list to include benzene, ethylbenzene, toluene, xylene, naphthalene, total petroleum hydrocarbons (TPH) as gasoline range organics, diesel range organics, and oil range organics. Historically, there are concentrations of other volatile and semi-volatile organic compounds (e.g., MTBE, 1,1-dichloroethane, phenol) in the groundwater samples collected from well MKTF-16 that have also exceeded applicable screening levels that NMED considers COCs. Therefore, the Permittee must analyze all constituents listed in EPA Method 8260B with detected concentrations in the

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
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groundwater samples collected from well MKTF-16 that exceeded applicable screening levels in the past five years in addition to TPH-GRO, DRO and MRO in the confirmation samples in the revised Work Plan. Revise all applicable sections of the Work Plan and provide replacement pages to include the extended list of constituents.

The Permittee must submit a response letter, replacement pages, and an electronic version of the revised Work Plan that addresses and incorporates the comment contained in this Approval with Modifications to NMED no later than **June 30, 2022**.

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 505-690-6930.

Sincerely,

Rick Shean

Digitally signed by Rick
Shean
Date: 2022.04.19
08:21:01 -06'00'

Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
M. Suzuki, NMED HWB
L. Barr, EMNRD OCD
L. King, EPA Region 6 (6LCRRC)
H. Jones, TriHydro

File: Reading File and WRG 2022 file