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Certified Mail - Return Receipt Requested

August 22, 2022

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS
WELL INSTALLATION AND ABANDONMENT REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID # NMD000333211
HWB-WRG-21-017**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has completed its review of the Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (Permittee) *Response to Approval with Modifications Well Installation and Abandonment Report* (Response), dated April 15, 2022 and received on April 21, 2022. NMED has reviewed the Response, and hereby issues the following comments.

Comment 1

In the response to NMED's Approval with Modifications Comments 2, the Permittee states, "[t]o date, the adjacent property owners have been unresponsive to the Refinery's attempts for communication. Recently, the Refinery learned that the property was sold in late 2021. The Refinery's effort to contact the new property owners is ongoing." Offsite monitoring wells that are located west of well OW-1 and northeast well OW-30 are essential to plume delineation. Provide a memorandum that summarizes correspondence between two parties for NMED's records no later than **December 31, 2022**.

Comment 2

In the response to Comment 4 of NMED's Approval with Modifications, the Permittee states, "[b]oring OW-69 was drilled to assess previously detected elevated concentrations of chloride and sulfate northwest of EP-2 and monitoring well GWM-1 and east of EP-2 by drilling to the Chinle/Alluvium aquifer interface." The statement is not completely accurate. Boring OW-69

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was originally advanced to delineate the extent of separate phase hydrocarbon (SPH) that was detected in well GWM-1. Due to the location of well GWM-1, it was possible that the SPH detected in well GWM-1 may have originated from the aeration lagoons. Therefore, NMED recommended the installation of a monitoring well downgradient from well GWM-1 halfway between the eastern perimeter of pond EP-2 and the aeration lagoons to evaluate the extent of SPH. Revise the statement and provide replacement pages.

Comment 3

In the response to Comment 7 of NMED's Approval with Modifications, the Permittee states, "[t]here were some groundwater analytes that had detection limits that exceeded the applicable standards. Groundwater analytes included: 1,2,3-Trichloropropane, 1,2-Dibromo-3-Chloropropane, 1,2-Dibromoethane, Hexachlorobutadiene, 2,6-Dinitrotoluene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Bis(2-chloroethyl)ether, Dibenzo(a,h)anthracene, Hexachlorobenzene, Hexachlorocyclopentadiene, Indeno(1,2,3-cd)pyrene, N-Nitrosodimethylamine, N-Nitrosodi-npropylamine, total beryllium, total cadmium, and TPH-ORO. 1-Methylnaphthalene had a standard exceedance that was evaluated to be undetected at the reported concentration in data validation, resulting in a non-detect standard exceedance. Vinyl chloride also had one non-detect standard exceedance. It should be noted that standard exceedances, even if a non-detection, are considered data quality exceptions. Therefore, those values cannot evaluate compliance for those constituents." If data quality exceptions are identified in the SWMUs and/or AOCs where long-term monitoring and/or remedial activities are required, the Permittee may continue to utilize the same analytical method for tracking contamination at the sites. However, if the Permittee plans to request Corrective Action Complete (CAC) status within the next three years, the Permittee must contract a laboratory for a method that can meet the criteria for all data used to establish compliance with the screening levels. No revision required.

The Permittee must address all comments in this letter and submit a memorandum required by Comment 1 no later than **December 31, 2022** and replacement pages required by Comment 2 no later than **October 20, 2022**.

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
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Rick Shean
Chief
Hazardous Waste Bureau

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

File: **Reading File and WRG 2022 file**