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DEC 12 2022

NMED Hazardous Waste Bureau

Western Refining Southwest LLC

1-40 Exit 39

A subsidiary of Marathon Petroleum Corporation

Jamestown, NM 87347

December 7, 2022

**CERTIFIED MAIL
RETURN RECEIPT**

**RE: Class I Permit Modification
Western Refining Southwest LLC, D/B/A Marathon Gallup Refinery
EPA ID #NMD000333211**

Dear Concerned Citizen, Adjacent Property Owner, and/or Concerned Public Official:

You are receiving this letter as notification of the Class I Permit Modification (Class I Modification) that Western Refining Southwest LLC, D/B/A Marathon Gallup Refinery (Refinery), submitted to the New Mexico Environment Department (NMED). This Class I Modification will be incorporated in the Refinery's Final Resource Conservation Recovery Act (RCRA) Post-Closure Permit (Permit) that was issued in October 2013 and modified in September 2017.

This Class I Modification combines several Areas of Concern (AOC) with overlapping footprints into one AOC (AOC 35) and will be incorporated into the RCRA Permit as Attachment G. The updated Attachment G is provided with this letter. In addition, the Refinery notified NMED of a modification to change the owner name from Western Refining Southwest, Inc. to Western Refining Southwest LLC, on January 8, 2021. This change was also incorporated into the Permit.

ENC: Permit Attachment G

cc w/enc.: Facility Mailing List

ATTACHMENT G: LIST OF UNITS

**TABLE G-1
 SOLID WASTE MANAGEMENT UNITS (SWMUS) & AREAS OF CONCERN (AOCS)
 REQUIRING CORRECTIVE ACTION**

Unit ID Number	Unit Description	Notes
SWMU 1	Aeration Basins	
SWMU 2	Evaporation Ponds	
SWMU 3	Heat Exchanger Bundle Cleaning Pad	Original SWMU 3, Empty Container Storage Pad, was approved for No Further Action by the EPA on January 7, 1994. The Empty Container Storage Area is removed from the unit description; however, the area was subsequently used for cleaning of heat exchanger bundles and is thus retained as SWMU 3
SWMU 4	Old Burn Pit	
SWMU 5	Landfill Areas	
SWMU 6	Tank Farm	
SWMU 7	Fire Training Area	
SWMU 8	Railroad Rack Lagoon and Fan-Out Area	Corrective Action Complete, moved to Table G-3
SWMU 9	Drainage Ditch and Inactive Landfarm	
SWMU 10	Sludge Pits	
SWMU 11	Secondary Oil Skimmer	
SWMU 12	Contact Wastewater Collection System/Stormwater Collection System	AOC 33 combined with SWMU 12
SWMU 13	Drainage Ditch Between API Evaporation Ponds and Neutralization Tank Evaporation Ponds	
SWMU 14	Old API Separator/ Flare and Ancillary Tanks (tanks Z85V2, V85V3, Z84-T105)	AOC 32 combined with SWMU 14
AOC 15	New API Separator	
AOC 16	New API Separator Overflow Tanks	Restored to Table G-1 from the 2017 Order
AOC 17	Railroad Loading/Unloading Facility	Restored to Table G-1 from the 2017 Order

AOC 18	Asphalt Tank Farm (tanks 701-709, 713, 714)	Restored to Table G-1 from the 2017 Order
AOC 19	East Fuel Oil Loading Rack	Corrective Action Complete, moved to Table G-3
AOC 20	Crude Slop (Transmix) and Ethanol Unloading Facility	Combined with AOC 21, 22, and 23 to become AOC 35
AOC 22	Loading Rack Additive Tank Farm	Combined with AOC 20, 21, and 23 to become AOC 35
AOC 23	Retail Fuel Tank Farm (tanks 1-7, 912, 913, 1001, 1002)	Combined with AOC 20, 21, and 22 to become AOC 35
AOC 24	Crude Oil Tank Farm (tanks 101 and 102)	Restored to Table G-1 from the 2017 Order
AOC 25	Tank 573 (Kerosene tank)	Corrective Action Complete, moved to Table G-3
AOC 26	Process Units	Restored to Table G-1 from the 2017 Order
AOC 27	Boiler and Cooling Unit Area	Restored to Table G-1 from the 2017 Order
AOC 28	Warehouse and Maintenance Shop Area	Restored to Table G-1 from the 2017 Order
AOC 29	Equipment Yard and Drum Storage Area	Restored to Table G-1 from the 2017 Order
AOC 30	Laboratory	Restored to Table G-1 from the 2017 Order
AOC 31	Tanks 27 and 28	Restored to Table G-1 from the 2017 Order
AOC 32	Flare and Ancillary Tanks (tanks Z85V2, V85V3, Z84-T105)	Combined with SWMU 14
AOC 33	Storm Water Collection System	Combined with SWMU 12
AOC 34	Scrap Yard	Restored to Table G-1 from the 2017 Order
AOC 35	Main Loading Racks/ Crude Slop (Transmix) and Ethanol Unloading Facility/ Loading Rack Additive Tank Farm/ Retail Fuel Tank Farm (tanks 1-7, 912, 913, 1001, 1002)	Former AOC 21, combined with AOC 20, 21, and 23 to become AOC 35

This list shall be modified if any additional SWMUs or AOCs are discovered or reported after the effective date of this Permit and the NMED determines that additional investigation of such SWMU or AOC is necessary.

TABLE G-2
SWMUs & AOCs
CORRECTIVE ACTION COMPLETE WITH CONTROLS

NAME	UNIT DESCRIPTION

TABLE G-3
SWMUs & AOCs
CORRECTIVE ACTION COMPLETE WITHOUT CONTROLS

NAME	UNIT DESCRIPTION
SWMU 8	Railroad Rack Lagoon and Fan-Out Area
AOC 19	East Fuel Loading Rack
AOC 25	Tank 573 (Kerosene Tank)