



Certified Mail - Return Receipt Requested

December 21, 2022

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

**RE: APPROVAL
FLARE KOD CAUSTIC RELEASE POST-EXCAVATION CONFIRMATION SCREENING
SUMMARY REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID# NMD000333211
HWB-WRG-21-020**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has received the Western Refining Southwest LLC (D/B/A Marathon Gallup Refinery (Permittee) *Flare KOD Caustic Release Post-Excavation Confirmation Screening Summary Report* (Summary Report) dated June 23, 2022, in response to NMED's *Approval Flare KOD Caustic Release Investigation Report* (Approval) letter dated January 24, 2022. NMED has reviewed the Summary Report, and hereby issues this Approval.

In the Post-Excavation Confirmation Screening results of the Summary Report the Permittee states "The vertical extent north of the retaining wall, around the concrete pad, was not confirmed. Groundwater was encountered at approximately 4 ft [below ground surface] bgs on the east side of the concrete pad. The groundwater had a pH of 10 [standard units] SU and greater. Multiple attempts to remove the groundwater using a vacuum truck were unsuccessful due to a high fluid recharge rate...further vertical excavation around the concrete pad was discontinued at 3 ft bgs despite floor pH screening results slightly above 9 SU." Additionally, in the Conclusions section of the Summary Report the Permittee states "Elevated pH levels have not been detected in the nearest downgradient monitoring well, OAPIS-1, during quarterly groundwater monitoring."

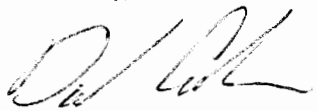
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NMED understands the Permittee has removed the affected soils to the extent possible and that testing of confirmation soil samples collected from the limits of the excavation did not detect pH levels greater than 9.9. Additionally, according to the facility wide groundwater monitoring reports, no impacts from the caustic release were detected in the nearest downgradient monitoring well, OAPIS-1 from June 2017 to December 2021. Based on the information presented, the Permittee may backfill the excavation areas.

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 Lane Andress of my staff at 505-690-5286.

Sincerely,



Dave Cobrain
Program Manager
Hazardous Waste Bureau

cc: L. Tsinnajinnie, NMED HWB
L. Andress, NMED HWB
H. Jones, Trihydro
L. King, EPA Region 6 (6LCRRC)

File: Reading File and WRG 2022 file