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Certified Mail - Return Receipt Requested

October 24, 2023



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

**RE: DISAPPROVAL
AREA OF CONCERN 35 PROCESS SEWER INVESTIGATION WORK PLAN
WESTERN REFINING SOUTHWEST LLC, GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID # NMD000333211
HWB-WRG-23-015**

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 (Permittee) *Area of Concern 35 Process Sewer Investigation Work Plan (Work Plan)*, dated March 31, 2023 and received on April 3, 2023. NMED hereby issues this Disapproval with the following comments.

Comment 1

In Section 4.1 (Smoke Testing Methodology), page 11 of 13, paragraph 2, the Permittee states, "[t]o assist in determining where line integrity issues may be present, smoke will be introduced into the process sewer system in AOC 35 from selected manhole locations with a blower." Although Figure 4-1 (Proposed Investigation Area) depicts the locations of the investigation area and process sewer line, the manhole locations where smoke will be introduced are not depicted. Revise Figure 4-1 to present the locations where smoke will be introduced. In addition, it is unclear how smoke will be generated and introduced to the sewer system through a manhole without smoke escaping into the atmosphere. Provide a schematic of the testing device that indicates where the smoke source is coming from and the placement of the blower in relation to the manhole. Explain how the device operates and how the Permittee will keep the smoke from escaping during the test. Revise the Work Plan accordingly.

Comment 2

In Section 4.1 (Smoke Testing Methodology), page 11 of 13, paragraph 2, the Permittee states, "[s]moke testing utilizes a non-toxic smoke approved by the Environmental Protection Agency for use in populated areas. A safety data sheet of the selected smoke will be reviewed prior to

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starting the field investigation.” The use of the selected smoke must be approved by NMED prior to the test. Provide a safety data sheet for the selected smoke in the revised Work Plan.

Comment 3

In Section 4.1 (Smoke Testing Methodology), page 11 of 13, paragraph 2, the Permittee states, “[t]he smoke introduction locations will be determined onsite and will be recorded in the daily field logs. Locations in AOC 35 will be monitored by a three- to five-person team for the visual presence of the smoke coming from the ground surface and/or at any openings in the process sewer system. Potential leaks are expected to present with smoke within minutes of introducing smoke into the sewer.” Address the following:

- a) The smoke introduction locations must be evaluated and approved by NMED prior to the commencement of smoke testing. Provide the smoke introduction locations in the revised Work Plan. Comment 1 above requires the Permittee to “[r]evise Figure 4-1 to present the locations where smoke will be introduced.”
- b) The statement indicates that visual observation is the only detection method for smoke. Visual observation of smoke may not be a reliable detection method, depending on the weather. If quantitative detection methods (e.g., gas analyzer) are available to detect concentrations of the compounds in the smoke, propose to use quantitative method(s) along with visual and olfactory observations. Revise the Work Plan accordingly.
- c) The sewer lines are buried, and a thick concrete slab may cover part of the ground surface of the investigation area where the sewer lines are buried. In this case, even if there are cracks and holes on the sewer lines, smoke may not come from the ground surface due to the presence of concrete. Include a provision to remove potential obstructions (e.g., concrete slab) from the investigation area, as necessary in the revised Work Plan.
- d) It is not clear how a sufficient volume of the smoke is applied to the sewer system during the test. The entire test section of the sewer system must be filled with smoke. If the smoke is applied to the one end of the investigation area through a manhole, it must exit from the other end of the investigation area through an opening (e.g., laboratory sink) to ensure a sufficient volume of the smoke is applied. Explain how a sufficient volume of the smoke is applied to the sewer system in the revised Work Plan.

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The Permittee must submit a revised Work Plan that addresses all of the comments contained in this Disapproval. Two hard copies and an electronic version on CD/DVD of the revised Work Plan must be submitted to the NMED. The Permittee must also include a redline-strikeout version in electronic format showing where all revisions to the Work Plan have been made. The revised Work Plan must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. The revised Work Plan must be submitted to NMED no later than **December 31, 2023**.

If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-690-6930.

Sincerely,

Ricardo Maestas Digitally signed by Ricardo Maestas
Date: 2023.10.24 10:35:48 -06'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
L. Tsinnajinnie, NMED HWB
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File: Reading File and WRG 2023 file