



## Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

**Certified Mail #: 7007-0220-0004-4767-9481**

April 21, 2023

Director  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency  
1201 Elm Street, Suite 500, Mail Code 6ECD  
Dallas, Texas 75270-2102

Re: Western Refining Southwest LLC D/B/A Marathon Gallup Refinery  
40 CFR 63 Subpart GGGGG: National Emission Standards for Hazardous Air Pollutants:  
Site Remediation (Site Remediation MACT) –Initial Notification

Dear Sir or Madam:

Pursuant to 40 CFR Part 63.9(b), Western Refining Southwest LLC is providing an Initial Notification that the Marathon Gallup Refinery may be subject to the applicable provisions of the Site Remediation MACT (40 CFR Part 63, Subpart GGGGG). The U.S. Environmental Protection Agency finalized revisions to the Site Remediation MACT on December 22, 2022, removing previous exemptions. Based on this final rulemaking revising the Site Remediation MACT to remove previous exemptions, the Marathon Gallup Refinery is providing the following Initial Notification.

### **Initial Notification (40 CFR 63.9(b)(2))**

#### Name and address of the owner or operator (40 CFR 63.9(b)(2)(i)):

Western Refining Southwest LLC  
92 Giant Crossing  
Gallup NM, 87301

#### Address (i.e., physical location) of the affected source (40 CFR 63.9(b)(2)(i)):

Marathon Gallup Refinery  
1-40, Exit 39  
Jamestown, NM 87347

**Western Refining Southwest LLC**

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I-40 Exit 39  
Jamestown, NM 87347Identification of the relevant standard (40 CFR 63.9(b)(2)(iii)):

40 CFR 63 Subpart GGGGG: National Emission Standards for Hazardous Air Pollutants: Site Remediation

Brief description of the nature, size, design, and method of operation of the source (40 CFR 63.9(b)(2)(iv)):

The Refinery is subject to a New Mexico Oil Conservation Division (OCD) Groundwater Discharge Permit (GW-032) that requires remediation of groundwater at the facility. Groundwater remediation currently includes a single pump and treat system with thirteen pumping wells with treatment of the groundwater in the refinery's permitted wastewater treatment unit. Additional remediation of soil and groundwater may be added in the future if deemed necessary by the New Mexico Environment Department (NMED).

An identification of the types of emission points within the affected source subject to the relevant standard (40 CFR 63.9(b)(2)(iv)):

The current emission points at the Refinery include remediation material management units (such as storage tanks, oil/water separators, and transfer systems), process vents (such as open-ended piping, stacks, or ducts to atmosphere), equipment leaks (such as pumps, valves, and connectors), and/or pressure relief devices, as those terms are defined in 40 CFR 63.7957.

Types of hazardous air pollutants emitted (40 CFR 63.9(b)(2)(iv)):

The types and quantities of Hazardous Air Pollutants (HAPs) regulated by Subpart GGGGG (i.e. Table 1 HAPs) vary depending on the material affecting the groundwater under remediation. Typical refinery HAPs, such as benzene, toluene, hexane, and naphthalene, are possible HAPs that could be present at site remediation locations.

A statement of whether the affected source is a major source or an area source (40 CFR 63.9(b)(2)(v)):

The NMED has classified the Marathon Gallup Refinery as a major source of HAP emissions in the facility's Title V operating permit P021-R4.



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Should you have any questions regarding this correspondence please contact me at (714) 713-1218 or [kaluka@marathonpetroleum.com](mailto:kaluka@marathonpetroleum.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kateri Luka'.

Kateri Luka  
Senior Environmental Specialist  
ES&S-Waste and Remediation  
Marathon Petroleum Company

Cc

S. Wells, NMOCD  
L. Andress, NMED HWB  
K. Luka, Marathon Petroleum Company  
H. Jones, Trihydro Corporation

D. Cobrain, NMED HWB  
Program Manager, AQB NMED  
J. Moore, Marathon Gallup Refinery

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
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**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

CONDITIONS

Action 210209

CONDITIONS

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 210209
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
scwells	Accepted for Records Retention Purposes Only	4/24/2023