

AP - 111

**Facility-Wide GW
Monitoring Plan**

2011



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

April 20, 2015

Mr. Ed Riege
Environmental Manager
Western Refining, Southwest Inc., Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

**RE: APPROVAL WITH MODIFICATIONS
FACILITY-WIDE GROUND WATER MONITORING
WORK PLAN, 2011 UPDATES
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-12-002**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) has reviewed the revised *Facility-Wide Ground Water Monitoring Work Plan, 2011 Updates* (Work Plan), dated October 2012, submitted on behalf of Western Refining Southwest Inc., Gallup Refinery (Permittee) and hereby issues this Approval with the following modifications.

Comment 1

For tracking purposes, title revisions to make it clear that the document is a revision.

Comment 2

NMED requires submittal of two paper copies and an electronic copy of documents (see Permit Section II.C.7 Submissions to the Environment Department). An “electronic copy” means that a disc with a readable PDF copy of the document must be included with the submittal. Ideally, with figures and tables included as separate files on the disc for ease of review. The “electronic copy” must not be submitted by email; this makes it harder to track the electronic submission

with the hard copy. For all future submittals, include a disc of the “electronic” copy with the hard copy of the submittal. Additionally, on the disc, include the required red-line strikeout version of the submittal showing where all changes have been made in the document; do not include a hardcopy of the redline strikeout.

Comment 3

In Section 5.3.1 (Request for Modification to Sampling Plan), the Permittee requests to change the monitoring schedule for monitoring wells OW-50, OW-52, and OW-1. NMED approved the request to change the monitoring schedule of OW-50 and OW-52 in the September 24, 2012 Disapproval letter. As NMED stated, the purpose of monitoring well OW-1 is to act as an observation well to evaluate whether or not any constituents from the refinery are migrating from the refinery property. OW-1 is also one of the monitoring wells in which uranium has been detected. The Permittee must continue to sample monitoring well OW-1 on a quarterly basis. The Permittee must address all of NMED’s comments and should have edited Section 5.3.1 in the Work Plan to reflect NMED’s Disapproval comments. Revise future Work Plans as required.

Comment 4

In Appendix C-1, table titled “Well Data 2011 Annual/Quarterly Sampling 2011 DTB/DTW Measurement” monitoring well OW-50 and OW-52 have a superscript 3, but there is no note associated with it at the end of the table. Additionally, there is no superscript 2 in the table. Ensure that tables are proofread before submittal. Ensure that all tables are corrected in future submittals.

Comment 5

There is no need to include Appendix A, “Approval with Modification, dated 9-24-12, from NMED-HWB”. The Permittee may reference the document in the Work Plan, as long as NMED has the letter in its administrative record; the Permittee does not need to include it in the submittal.

Comment 6

Figures 5 (Sonsela Water, Piezometric Surface (October 2011)) and 6 (Chinle Gp./Alluvium Interface Water, Piezometric Surface (November 2011)) are not “Piezometric” surfaces. Ensure that the titles of figures in future submittals are revised.

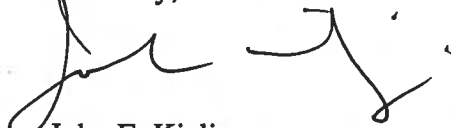
Comment 7

In NMED’s December 12, 2012 Approval with Modifications, Comment 12 requires that “[t]he Permittee must sample wells up gradient from NAPIS-1, NAPIS-2, NAPIS-3, KA-3, OW-1, OW-10, and OW-11 and review groundwater analytical results to determine if uranium detections are similar to concentrations in unaffected wells.” The Permittee must include sampling of upgradient wells for analysis of uranium in future Work Plans.

Ed Riege
Gallup Refinery
April 20, 2015
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If you have questions regarding this Approval with Modifications, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,

A handwritten signature in black ink, appearing to read 'John E. Kielling', with a stylized, sweeping flourish at the end.

John E. Kielling
Chief
Hazardous Waste Bureau

cc: D. Cobrain NMED HWB
N. Dhawan NMED HWB
K. Van Horn NMED HWB
C. Chavez OCD
C. Johnson WRG

File: Reading File and WRG 2015 File
WRG-12-002