

AP\_\_111\_\_

C-141s

(5)



**Marathon  
Petroleum Company LP**

December 11, 2018

Mr. John E. Kieling, Chief  
New Mexico Environmental Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505

**Re: AOC 17 Railroad Loading/Unloading Facility Assessment Report  
Marathon Petroleum Company LP  
EPA ID # NMD000333211**

Dear Mr. Kieling:

Marathon Petroleum Company (MPC) is submitting the attached assessment report hard copies and associated electronic files to the New Mexico Environmental Department (NMED) for review. Enclosed please find two bound copies of the report along with two copies of a CD containing electronic copies of the report and cover letter.

If you require any additional information, please do not hesitate to contact me at 505-726-9745.

Sincerely,  
**Marathon Petroleum Company LP**

A handwritten signature in black ink, appearing to be 'B. Moore', written over a horizontal line.

Brian K. Moore  
Remediation Project Manager

cc: C. Chavez (OCD)

92 Giant Crossing Road  
Jamestown, NM 87347

## AOC 17 – Railroad Loading/Unloading Facility Assessment Report

- (1) location of unit(s) on a topographic map of appropriate scale, as required under 40 CFR § 270.14(b)(19);

*See attached topo maps for location of AOC 17 (Figure 1).*

- (2) designation of type and function of unit(s);

*The subject area of concern (AOC) identified as AOC 16 is located on the northeast corner of the Main Tank Farm. It has been used for loading and unloading petroleum products and additives (e.g., methyl tert butyl ether) to and from railcars. The AOC was identified based on a release of oil and water to the area near and along the railroad tracks that enter the property from the north.*

- (3) dimensions, capacities and structural description of unit(s) (supply any available plans/drawings);

*The AOC is estimated to cover an area approximately by 50 feet wide by 650 feet long, but it has not been fully defined by sampling and analysis of environmental samples (Figure 2).*

- (4) dates that the unit(s) was operated;

*The loading rack is believed to have been in continuous operation since 1958.*

- (5) all available site history information;

*The refinery began operation in the late 1950s and the refinery property covers an area of approximately 810 acres. The refinery location and the regional vicinity is characterized as high desert plain comprised primarily of public lands used for grazing by cattle and sheep.*

*The Gallup Refinery is a crude oil refinery that generally processes crude oil from the Four Corners area transported to the facility by pipeline or tanker truck. Various process units have operated at the facility, including crude distillation, reforming, fluidized catalytic cracking, alkylation, isomerization, sulfur recovery, merox treater, and hydrotreating. Current and past operations have produced gasoline, diesel fuels, jet fuels, kerosene, propane, butane, and residual fuel.*

- (6) specifications of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous waste or hazardous constituents in the wastes;

*No wastes were managed at the AOC. Only petroleum products or additives (e.g., MTBE) have been handled at the loading rack.*

- (7) all available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s) (to include ground water data, soil analyses, air, and surface water data).

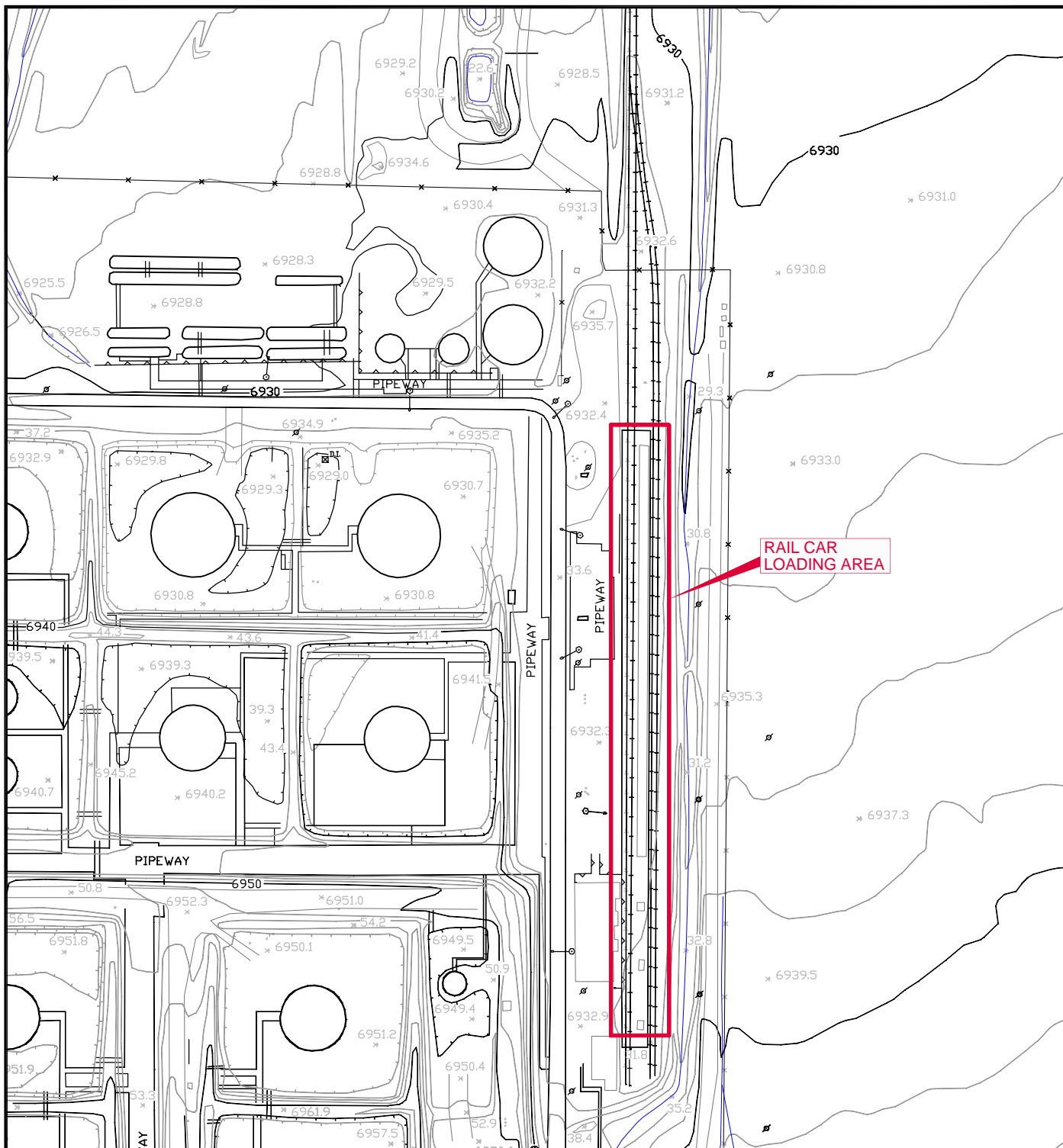
*NMED has previously noted that oil and water was vacuumed from the area of the load rack, including from a sump. Based on this historical information, it is not entirely clear if any hazardous constituents were released to the environment or fully contained within the containment area. However, on May 7, 2017 an operator observed gasoline pooling underneath the pipe rack located on the west side of the rail car loading*

area. The operator observed that gasoline had pooled in and around the pipe rack area and was flowing into the sewer box located near the rail car loading area. The Maintenance Department responded to the release and began to vacuum out the sewer box. The sewer cup overflowed onto a concrete pad located beneath the pipe rack and into a sewer drain. No personnel injuries were reported and no fires occurred from this release.

The overflow was contained inside a concrete berm underneath the pipe rack and then flowed in a south, south-easterly direction within the bermed containment towards a sewer box (Figure 3). The overflow was pumped out using a vacuum truck and approximately three truck loads were collected from the area as well as from the sump box located north of the pipe rack. An estimated 8,900 gallons of gasoline was picked up via vacuum truck and placed back into the process at the slop tank. Clean-up activities beyond the containment areas were not conducted as the majority of the spill was contained inside a concrete pad. It was reported that "gasoline spilled to the land surface", but contained within the area that drains to the sewer box.

Notification of the spill was provided to the NMED Hazardous Waste Bureau and the Oil Conservation Division via email on May 8, 2017 5:08 pm. An initial written report (Form C-141) was completed on August 30, 2017 for this release.





Map Source: Compiled by Photogrammetric Methods from Photography  
Acquired on March 1, 1998.



MARATHON PETROLEUM COMPANY  
GALLUP REFINERY

PROJ. NO.: Marathon | DATE: 12/05/18 | FILE: Mathon-dA143

**FIGURE 1**  
**SITE LOCATION MAP**  
**RAIL CAR LOADING AREA**



0 150  
SCALE IN FEET



SITE LOCATION

**DiSorbo**  
Environmental Consulting Firm

8501 N. MoPac Expy.  
Suite 300  
Austin, Texas 78759



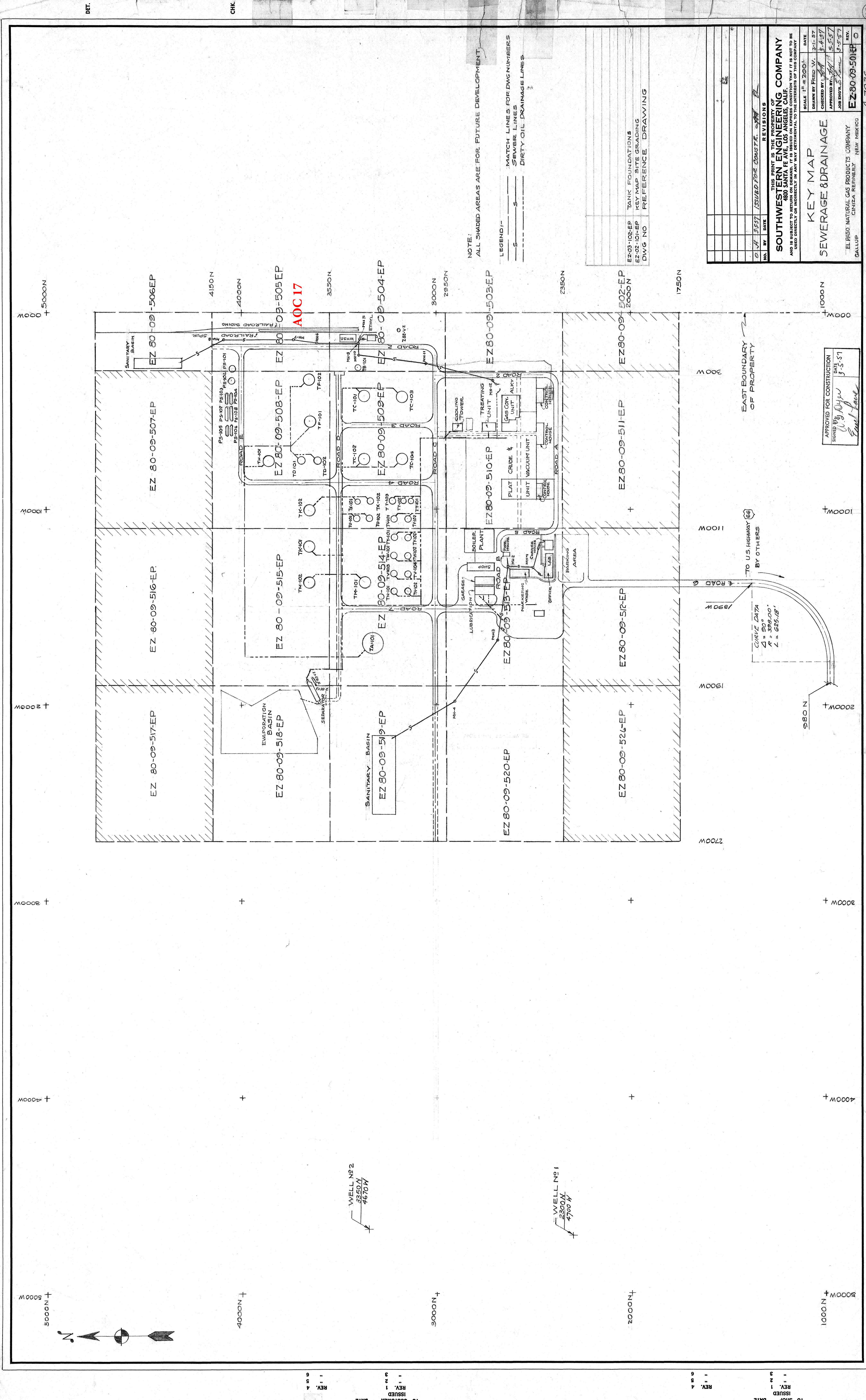
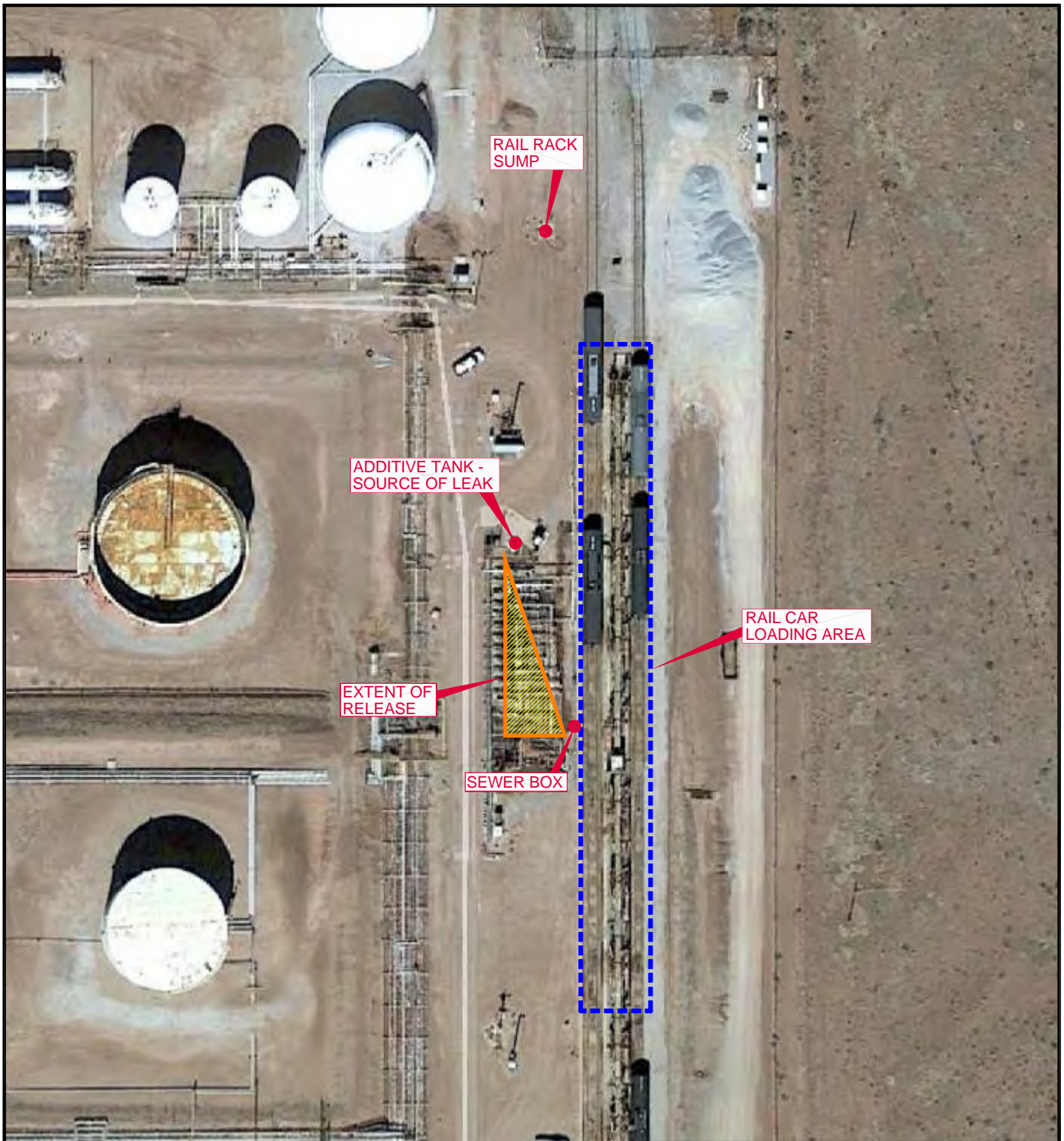


FIGURE 2 - Facility Layout





Map Source: Google Aerial, 03/18/2016.



MARATHON PETROLEUM COMPANY  
GALLUP REFINERY

PROJ. NO.: Marathon | DATE: 12/05/18 | FILE: Mathon-dA145

FIGURE 3  
EXTENT OF RELEASE  
RAIL CAR LOADING AREA



0 80  
SCALE IN FEET

LEGEND



EXTENT OF RELEASE

**DiSorbo**  
Environmental Consulting Firm

8501 N. MoPac Expy.  
Suite 300  
Austin, Texas 78759

## Chavez, Carl J, EMNRD

---

**From:** Moore, John <JMoore5@Marathonpetroleum.com>  
**Sent:** Thursday, November 29, 2018 11:30 AM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Griswold, Jim, EMNRD; VanHorn, Kristen, NMENV  
**Subject:** [EXT] RE: [EXTERNAL] FW: Release at Western Refining Southwest's Gallup Refinery  
**Attachments:** 201811291103.pdf

Carl,

Attached, please find the requested C-141 regarding the spill we had last week. If you have any questions, or need any more information, please let me know.

John Moore, P.E.  
Environmental Superintendent  
[JMoore5@Marathonpetroleum.com](mailto:JMoore5@Marathonpetroleum.com)

MPC – Gallup Refinery  
Phone: (505) 722-0205  
Mobile: (307) 337-7642  
[www.Marathonpetroleum.com](http://www.Marathonpetroleum.com)



---

**From:** Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>  
**Sent:** Tuesday, November 27, 2018 4:53 PM  
**To:** Moore, John <JMoore5@Marathonpetroleum.com>  
**Cc:** Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; VanHorn, Kristen, NMENV <Kristen.VanHorn@state.nm.us>  
**Subject:** [EXTERNAL] FW: Release at Western Refining Southwest's Gallup Refinery

John:

Please submit a C-141 Form to OCD and NMED on this release.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)  
New Mexico Oil Conservation Division  
Energy Minerals and Natural Resources Department  
1220 South St Francis Drive  
Santa Fe, New Mexico 87505  
Ph. (505) 476-3490  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)

**“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)**

---

**From:** Griswold, Jim, EMNRD  
**Sent:** Tuesday, November 27, 2018 2:22 PM  
**To:** Chavez, Carl J, EMNRD <[CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)>  
**Subject:** Fwd: Release at Western Refining Southwest's Gallup Refinery

*Sent from my Verizon Wireless 4G LTE Droid*

----- Forwarded message -----

From: "Connolly, Stephen, NMENV" <[Stephen.Connolly@state.nm.us](mailto:Stephen.Connolly@state.nm.us)>  
Date: Nov 27, 2018 8:43 AM  
Subject: Release at Western Refining Southwest's Gallup Refinery  
To: "Griswold, Jim, EMNRD" <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>  
Cc:

Notification ID	13353
Notification Type	Spills
Notification Date	11/23/2018 10:09:49 AM
Notification Priority	
Status	Forward Outside NMED
Assigned Bureau	Other than NMED
Assigned Staff	
Status Date	11/27/2018 8:41:36 AM
Description	While transferring material a level gauge froze causing a tank to overfill and spill onto the ground. Approximately 35 barrels of gasoline was spilled to the soil. All material was contained inside the containment dikes. The material is currently being removed by vacuum truck and then impacted soil will be addressed.
Additional info	
Location	Tank 563 at Western Refining Southwest's Gallup Refinery. 92 Giant Crossing Road.
Tribal Lands	<input type="checkbox"/>
Nearest City	Jamestown
County	Mckinley
Field Office	
Suspected Responsible Party	Western Refining
Resp. Party Address1	92 Giant Crossing Road

Resp. Party Address2	
Resp. Party City	Gallup
Resp. Party State	NM
Resp. Party ZIP	87301
Resp. Party Phone	
Reporter Name	John Moore
Reporter Address1	92 Giant Crossing Road
Reporter Address2	
Reporter City	Gallup
Reporter State	New Mexico
Reporter ZIP	87301
Reporter Phone	307-337-7642
Reporter Email	<a href="mailto:JMoore5@marathonpetroleum.com">JMoore5@marathonpetroleum.com</a>
Created By	public
Date Created	11/23/2018 10:09:49 AM

Stephen Connolly, CHMM  
Incident Response Coordinator  
Phone: (505) 476-6025  
Fax: (505) 476-6030

Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505  
[stephen.connolly@state.nm.us](mailto:stephen.connolly@state.nm.us)

TO REPORT SPILLS OR INCIDENTS OF HAZARDOUS MATERIALS CALL: 866-428-6535 FOR AFTER- HOURS EMERGENCIES CALL 505-827-9329

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party	MARATHON PETROLEUM	OGRID	
Contact Name	JOHN MOORE	Contact Telephone	505-722-0205
Contact email	JMoore5@Marathonpetroleum.com	Incident # (assigned by OCD)	
Contact mailing address			

### Location of Release Source

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	GALLUP REFINERY	Site Type	REFINERY
Date Release Discovered	11-23-18	API# (if applicable)	

Unit Letter	Section	Township	Range	County
	33	15N	15W	MCKINLEY

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (Name: WESTERN REFINING SOUTHWEST)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input checked="" type="checkbox"/> Other (describe) GASOLINE	Volume/Weight Released (provide units) 35 bbls	Volume/Weight Recovered (provide units) 71.42 bbls

Cause of Release

AI LEVEL GAUGE FROZE WHILE MATERIAL WAS BEING TRANSFERRED CAUSING THE TANK TO OVERFILL

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?  GREATER THAN 25 bbls
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? IMMEDIATE NOTICE WAS GIVEN THROUGH THE NMED WEBSITE AND A PHONE CALL TO THE HOTLINE LISTED	

**Initial Response**

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:  	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <u>JOHN MOORE</u>	Title: <u>ENVIRONMENTAL SUPERVISOR</u>
Signature: <u>[Signature]</u>	Date: <u>11-29-18</u>
email: <u>JMOORE@Marathonpetroleum.com</u>	Telephone: <u>505-722-0205</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____	



## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Tuesday, November 27, 2018 4:53 PM  
**To:** 'Moore, John'  
**Cc:** Griswold, Jim, EMNRD; VanHorn, Kristen, NMENV  
**Subject:** FW: Release at Western Refining Southwest's Gallup Refinery

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Thank you.

Mr. Carl J. Chavez, CHMM (#13099)  
New Mexico Oil Conservation Division  
Energy Minerals and Natural Resources Department  
1220 South St Francis Drive  
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Ph. (505) 476-3490  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)

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*Sent from my Verizon Wireless 4G LTE Droid*

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Cc:

Notification ID	13353
Notification Type	Spills
Notification Date	11/23/2018 10:09:49 AM
Notification Priority	
Status	Forward Outside NMED

Assigned Bureau	Other than NMED
Assigned Staff	
Status Date	11/27/2018 8:41:36 AM
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Location	Tank 563 at Western Refining Southwest's Gallup Refinery. 92 Giant Crossing Road.
Tribal Lands	<input type="checkbox"/>
Nearest City	Jamestown
County	Mckinley
Field Office	
Suspected Responsible Party	Western Refining
Resp. Party Address1	92 Giant Crossing Road
Resp. Party Address2	
Resp. Party City	Gallup
Resp. Party State	NM
Resp. Party ZIP	87301
Resp. Party Phone	
Reporter Name	John Moore
Reporter Address1	92 Giant Crossing Road
Reporter Address2	
Reporter City	Gallup
Reporter State	New Mexico
Reporter ZIP	87301
Reporter Phone	307-337-7642
Reporter Email	<a href="mailto:JMoore5@marathonpetroleum.com">JMoore5@marathonpetroleum.com</a>
Created By	public
Date Created	11/23/2018 10:09:49 AM

Phone: (505) 476-6025  
Fax: (505) 476-6030

Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505  
[stephen.connolly@state.nm.us](mailto:stephen.connolly@state.nm.us)

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*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**

***Hazardous Waste Bureau***

SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6313  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.env.nm.gov](http://www.env.nm.gov)



BUTCH TONGATE  
Cabinet Secretary

J. C. BORREGO  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

March 15, 2018

William Bailey  
Environmental Supervisor  
Western Refining, Southwest Inc., Gallup Refinery  
92 Giant Crossing Road  
Gallup, New Mexico 87301

**RE: INFORMATION REQUEST  
PETROLEUM RELEASE NEAR STP-1  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-MISC**

Dear Mr. Bailey:

The New Mexico Environment Department (NMED) is in receipt of the Western Refining Southwest, Inc. Gallup (Permittee) initial spill release report regarding a naphtha release that was discovered east of pond STP-1 on February 6, 2018.

The Permittee met its obligation under the Resource Conservation and Recovery Act Permit's (Permit) Section II.C.2.c (24 Hour and Subsequent Reporting) for the 24-hour reporting and written initial spill report requirements. The Permittee called NMED's spill reporting phone line and left a message at 22:33 on Wednesday, February 7, 2018 to report a release of "less than 25 barrels" of naphtha. The Permittee also contacted the New Mexico Energy, Minerals, and Natural Resource Department (EMNRD) Oil Conservation Division (OCD) to report the release. Subsequently, the Permittee emailed an initial spill report to both NMED and OCD with additional details regarding the release.

The Permittee is responsible under Permit Section IV.B.4 (Future Releases) to conduct a response action and submit a response action report within one year of the discovery of the release. Due to the nature of the release and the history of releases, the following information sought by the comments below must be submitted prior to submittal of the Response Action Report. The Permittee may refer to their responses to this Information Request in the Response Action Report.

Additionally, it is highly recommended that the Permittee seek input from both NMED and OCD before proceeding with interim measures or corrective actions to ensure that the Permittee meets the regulatory requirements for both agencies and avoids unnecessary use of resources. Provide responses to the following comments and questions in a letter addressed to both agencies:

**Comment 1**

The initial spill report states, "a mixture of petroleum product (20%) and water was found releasing out of a 4" diameter PVC pipe that discharges into a stormwater drainage ditch south of STP-1." Provide information to address the following questions:

- 1) Where does the PVC pipe originate?
- 2) Is the PVC pipe connected to other piping? If so, what do the other pipes convey?
- 3) How was the 20:80 ratio of petroleum:water determined?
- 4) Does the PVC pipe usually discharge stormwater? What are the source areas for the stormwater captured (e.g., process area, office, parking lot)?
- 5) If one source is stormwater, is the stormwater sampled?

**Comment 2**

The Permittee states that, "[i]nvestigations into the source upstream of the discharge point continued into the following day (February 7, 2018). After obtaining some drawings of project work that had taken place near STP-1, site personnel began excavating a suspect area. At approximately 5 feet below substrate hydrocarbon-saturated soil was encountered in the area east of STP-1." Provide information regarding underground lines east of STP-1 and whether any of the underground lines convey naphtha. Provide schematic drawings of the underground piping back to the refinery and tank farms. Describe the distance between the pipe outlet, the suspect area, and underground piping for naphtha, and the location(s) of naphtha storage.

**Comment 3**

The Permittee also notified NMED of a discovered release on March 27, 2017, where naphtha was seeping out of the ground from a carbon steel pipe, which was the sour naphtha line to Tank 567. It appears that underground piping at the facility may be corroding. Underground pipeline leaks may be contributing to the contaminants in soil and groundwater downgradient from the process and tank areas. NMED recommends that the Permittee coordinate with OCD to conduct Hydrostatic Tests ("HST") of underground pipelines at the facility. Provide NMED with the timeline for the HST after coordinating with OCD.

**Comment 4**

In the initial spill report, the Permittee states, “[a]t 08:30 pm, it was determined that the catch basins were not preventing any further release to ground. According to the initial calculations, the on-going release is estimated to be >25bbls shortly after 10am on February 8, 2018.”

Describe whether naphtha reached the ground surface where the catch basins were used to try to capture the release.

**Comment 5**

The Permittee provided a figure depicting French drains and pipes located in the vicinity of pond STP-1. Provide additional information regarding the following:

- 1) Provide a fully labelled figure depicting all pipes and drain structures in the vicinity of pond STP-1.
- 2) Describe the lines depicted in the figure where there appears to be pipelines located along the highlighted French drain east and south of pond STP-1 and the lines that are connected to the wastewater discharge line from the wastewater treatment system and the pipeline located east of Evaporation Pond 1.
- 3) Discuss whether there is underground piping near STP-1 and the Aeration Basin that would affect excavations in the area.
- 4) Describe the purpose of the 6-inch PVC pipe on the southern end of STP-1 and where it discharges to (the drawing merely shows where it ends).

**Comment 6**

The Permittee states, “[s]ite personnel continue to monitor the catch basin and utilize a vacuum truck to transfer its contents back into the process.” Describe where the wastewater is being added back into the wastewater treatment system. Because of on-going issues regarding underground piping leaks from the sewer system, the Permittee must ensure that products are not re-introduced at locations that will result in additional releases to the subsurface.

**Comment 7**

Reminders regarding soil excavations include:

- 1) Waste characterization samples (toxicity characteristic leaching procedure (TCLP)) must be collected from the excavated soil. The number of waste characterization samples must be based on the amount of soils excavated (e.g., one sample per 25 cubic yards of waste, or similar).
- 2) To confirm that contaminated soils were removed, confirmation samples must be collected from the excavation (sidewalls and base of excavation) and analyzed for total volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), metals, gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO). Once soil cleanup is confirmed, then the excavation may be backfilled. If the

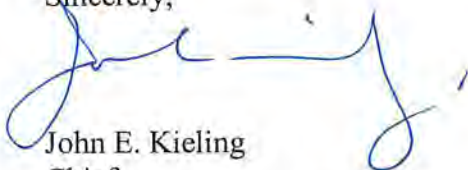
Mr. Bailey  
March 15, 2018  
Page 4

Permittee removes soils and does not confirm that all contaminants were removed, the Permittee must conduct additional sampling to demonstrate that residual contamination is less than the corresponding screening levels.

The Permittee must address all comments in this letter and submit a response to NMED and OCD by no later than **June 29, 2018**. The response letter must cross-reference the numbered comments in this letter. Please also provide a plan for underground line testing to NMED and OCD for review no later than **November 30, 2018**.

If you have questions regarding this letter, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,

A handwritten signature in blue ink, appearing to read "John E. Kieling", with a stylized flourish at the end.

John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: K. Van Horn NMED HWB  
M. Suzuki NMED HWB  
C. Chavez OCD  
J. O'Brien, Andeavor  
L. King EPA Region 6

File: Reading File and WRG 2018 File  
HWB-WRG-18-MISC

## Chavez, Carl J, EMNRD

---

**From:** O'Brien, Jessica L <Jessica.L.O'Brien@andeavor.com>  
**Sent:** Thursday, February 8, 2018 9:21 AM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** VanHorn, Kristen, NMENV; Pruner, Dave  
**Subject:** Gallup Refinery Naphtha release  
**Attachments:** draft C-141 Naphtha Release.doc; Approx Location of French Drain.pdf

Carl,  
Per our recent phone conversation, I've attached a Form C-141 regarding the on-going naphtha release. I'll update you as we gain more information during our investigation into the source. The area that some excavation was completed is shown by the green highlighted French drain to the right of STP-1.

Sincerely,

**Jessica O'Brien**  
Environmental Consent Decree Specialist  
EHS&S – Environmental Department  
[Jessica.L.O'Brien@andeavor.com](mailto:Jessica.L.O'Brien@andeavor.com)

**Andeavor**  
19100 Ridgewood Parkway  
San Antonio, Texas 78259  
o: 210 626 7774  
c: 409 454 3777  
[andeavor.com](http://andeavor.com)





District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

## Release Notification and Corrective Action

### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: Western Refining	Contact: Jessica O'Brien	
Address: I-40 Exit 39, Jamestown, NM 87347	Telephone No: (505) 722-0287	
Facility Name: Gallup Refinery	Facility Type: Petroleum Refinery	
Surface Owner	Mineral Owner	API No.

### LOCATION OF RELEASE

Unit Letter	Section <b>28</b>	Township <b>15N</b>	Range <b>15W</b>	Feet from the	North/South Line	Feet from the	East/West Line	County <b>McKinley</b>
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Latitude 35°29'20.29"N Longitude 108°25'41.13"N NAD83

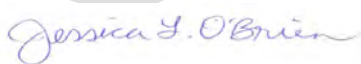
### NATURE OF RELEASE

Type of Release: <b>Naphtha</b>	Volume of Release <b>&gt;25bbls, on-going</b>	Volume Recovered: <b>On-going</b>
Source of Release: <b>Under investigation, (4" diameter PVC pipe)</b>	Date and Hour of Occurrence <b>02/6/2018 @ 11:00 am</b>	Date and Hour of Discovery <b>02/7/2018 @ 8:30 pm</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Carl Chavez, OCD District 3 (left voicemail)</b>	
By Whom? <b>Jessica O'Brien</b>	Date and Hour <b>02/07/2018 @ 9:15pm</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully. *N/A		

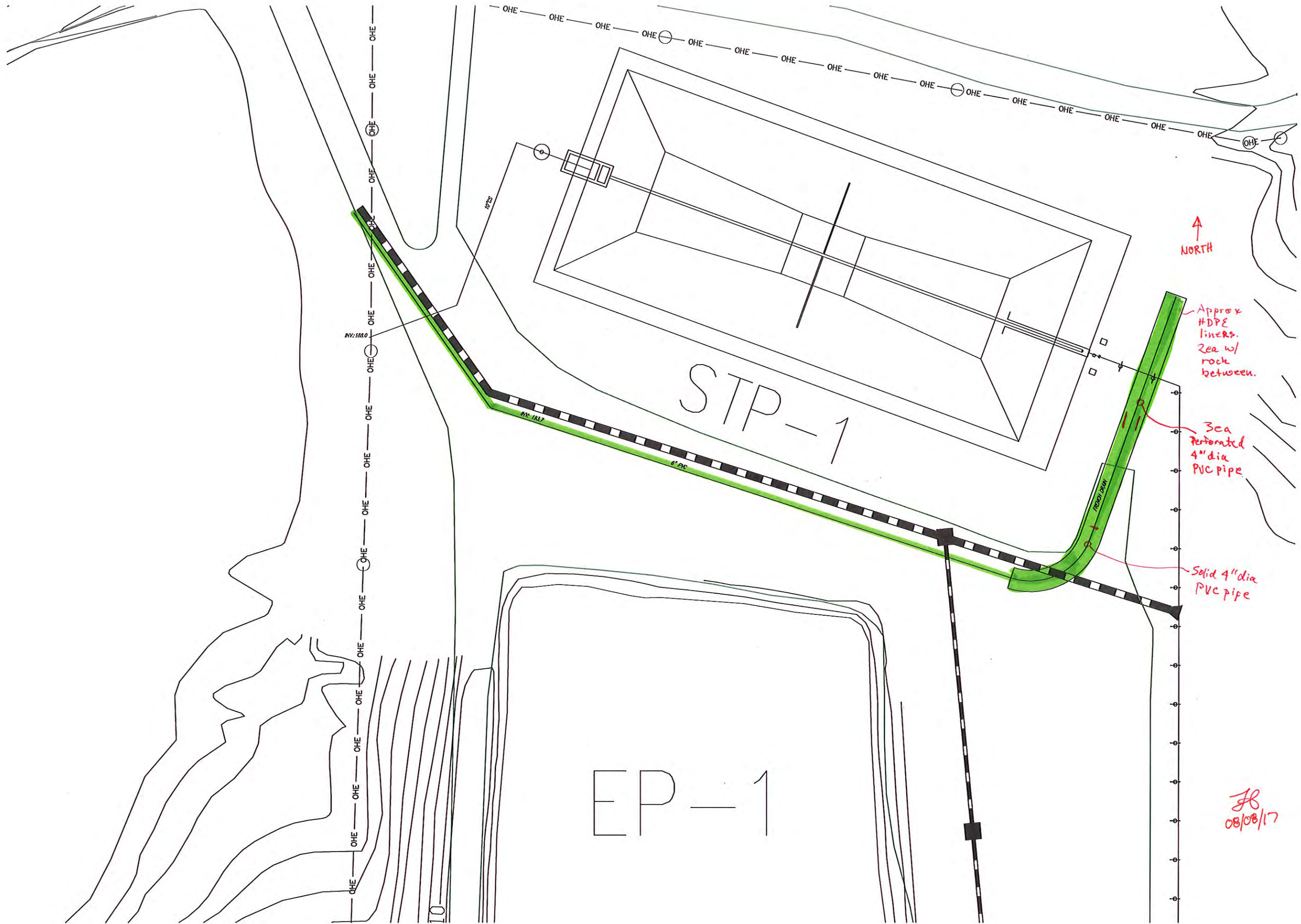
Describe Cause of Problem and Remedial Action Taken.\* On February 6, 2018 at approximately 11:00am a mixture of petroleum product (20%) and water was found releasing out of a 4" diameter PVC pipe that discharges into a stormwater drainage ditch south of STP-1. Sample analysis indicated the product to be naphtha. The flow from the pipe was estimated to be 1.7 gallons per minute. The drainage ditch feeds into a small collection pond that is equipped with a drain valve. This valve has remained closed and no product has been discharged from the pond. A catch basin was placed beneath the PVC pipe to prevent any further release of product to the ground. Site personnel continue to monitor the catch basin and utilize a vacuum truck to transfer its contents back into the process. Based on the flow rate and 20% percent content of naphtha, the release to ground was estimated to be less than 25 bbls. Investigations into the source upstream of the discharge point continued into the following day (February 7, 2018). After obtaining some drawings of project work that had taken place near STP-1, site personnel began excavating a suspect area. At approximately 5 feet below substrate hydrocarbon-saturated soil was encountered in the area east of STP-1. At 08:30 pm, it was determined that the catch basins were not preventing any further release to ground. According to the initial calculations, the on-going release is estimated to be >25bbls shortly after 10am on February 8, 2018. Due to safety concerns, excavation work was stopped. Investigative work will continue.

Describe Area Affected and Cleanup Action Taken.\* Affected area is near southeast corner and east side of STP-1. Release from 4" PVC pipe is being contained and recycled back into the process.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Jessica O'Brien		Approved by Environmental Specialist:	
Title: Environmental Supervisor	Approval Date:	Expiration Date:	
E-mail Address: Jessica.L.o'brien@andeavor.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: February 8, 2019	Phone: (505) 722-0287		

\* Attach Additional Sheets If Necessary



↑  
NORTH

Approx  
HDPE  
liners.  
2ea w/  
rock  
between.

3ea  
Perforated  
4\"/>

Solid 4\"/>

JH  
08/08/17

## Chavez, Carl J, EMNRD

---

**From:** Vestal, Janelle <Janelle.Vestal@andeavor.com>  
**Sent:** Wednesday, January 3, 2018 1:24 PM  
**To:** VanHorn, Kristen, NMENV  
**Cc:** Kieling, John, NMENV; Chavez, Carl J, EMNRD; O'Brien, Jessica L; Pruner, Dave  
**Subject:** RE: Release discovery Alky unit sewer  
**Attachments:** 180103 alky sewer line leak drawing - revised.pdf

Good Afternoon Kristen,

On December 21, dirt was being excavated in an area that contains an 8" sewer line that crosses from an old ASO pit north of the Alky Unit. As dirt was removed from around the sewer line, a leak started. A plug was installed in the upstream sewer box to isolate the leaking sewer line. Approximately 100 gallons of material (water and ASO) leaked into the excavated area and was vacuumed out of the excavated area.

Attached please find a drawing showing the location of the sewer leak discovered on December 21.

Please let me know if you have additional questions,

**Janelle Vestal** | Environmental Engineer  
**Andeavor**  
o: 505 726 9721  
m: 505 285 8193  
Janelle.Vestal@andeavor.com



---

**From:** Vestal, Janelle  
**Sent:** Wednesday, December 27, 2017 6:24 PM  
**To:** VanHorn, Kristen, NMENV <kristen.vanhorn@state.nm.us>  
**Cc:** Kieling, John, NMENV <john.kieling@state.nm.us>  
**Subject:** Re: Release discovery Alky unit sewer

Hi Kristen,  
I am on vacation this week, but I will get you the information when I return to the office next week.

Thanks,  
Janelle Vestal

Get [Outlook for iOS](#)

---

**From:** VanHorn, Kristen, NMENV <[Kristen.VanHorn@state.nm.us](mailto:Kristen.VanHorn@state.nm.us)>  
**Sent:** Tuesday, December 26, 2017 9:41:55 AM  
**To:** Vestal, Janelle  
**Cc:** Kieling, John, NMENV  
**Subject:** Release discovery Alky unit sewer

Hi Janelle-

I received the voicemail you left on Friday, December 22<sup>nd</sup> regarding the discovery of a release from the alky sewer discovered on Thursday the 21<sup>st</sup>. Please provide a figure that shows where the leak was discovered and update the amount of material from the release once you've been able to calculate, etc.

Thank you,  
Kristen

**KRISTEN VAN HORN**  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1  
Santa Fe, NM 87505  
(505) 476-6046





# LEVINGSTON ENGINEERS, INC.

PAGE \_\_\_\_\_ OF \_\_\_\_\_

JOB NO. \_\_\_\_\_

CLIENT \_\_\_\_\_ REF. \_\_\_\_\_

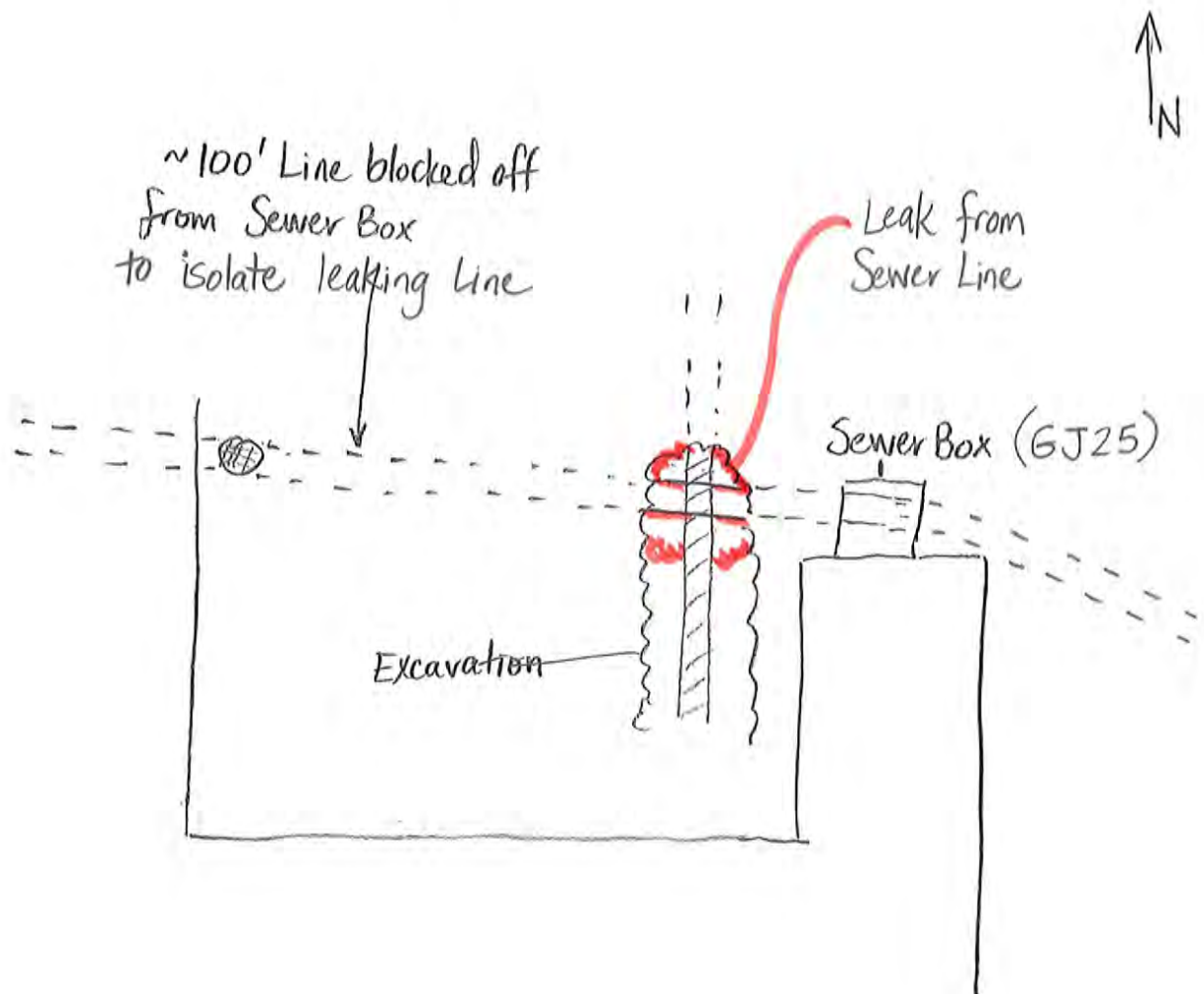
DATE \_\_\_\_\_

JOB \_\_\_\_\_

BY \_\_\_\_\_

SUBJECT \_\_\_\_\_

CHECKED BY \_\_\_\_\_



ALKY

## Chavez, Carl J, EMNRD

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Tuesday, January 2, 2018 12:03 PM  
**To:** 'Janelle.vestal@andeavor.com'  
**Cc:** VanHorn, Kristen, NMENV; Griswold, Jim, EMNRD  
**Subject:** FW: Release discovery Alky unit sewer

Janelle:

Hi. Please also copy the New Mexico Oil Conservation Division (OCD) on releases at the facility.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)  
New Mexico Oil Conservation Division  
Energy Minerals and Natural Resources Department  
1220 South St Francis Drive  
Santa Fe, New Mexico 87505  
Ph. (505) 476-3490  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)

**“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)**

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**From:** VanHorn, Kristen, NMENV  
**Sent:** Tuesday, December 26, 2017 9:59 AM  
**To:** Chavez, Carl J, EMNRD <[CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)>  
**Subject:** FW: Release discovery Alky unit sewer

FYI...

---

**From:** VanHorn, Kristen, NMENV  
**Sent:** Tuesday, December 26, 2017 9:42 AM  
**To:** 'Janelle.vestal@andeavor.com' <[Janelle.vestal@andeavor.com](mailto:Janelle.vestal@andeavor.com)>  
**Cc:** Kieling, John, NMENV <[john.kieling@state.nm.us](mailto:john.kieling@state.nm.us)>  
**Subject:** Release discovery Alky unit sewer

Hi Janelle-

I received the voicemail you left on Friday, December 22<sup>nd</sup> regarding the discovery of a release from the alky sewer discovered on Thursday the 21<sup>st</sup>. Please provide a figure that shows where the leak was discovered and update the amount of material from the release once you've been able to calculate, etc.

Thank you,  
Kristen

**KRISTEN VAN HORN**  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1

**Chavez, Carl J, EMNRD**

---

**From:** Johnson, Cheryl A <Cheryl.A.Johnson@andeavor.com>  
**Sent:** Thursday, August 31, 2017 6:42 AM  
**To:** Kieling, John, NMENV; Chavez, Carl J, EMNRD; VanHorn, Kristen, NMENV  
**Cc:** Hains, Allen S; Bailey, William M  
**Subject:** C-141 - Naphtha Leak and RRR Gasoline Spill  
**Attachments:** NMED-OCD Resp 083017.pdf; C-141-Naphtha Leak-(Initial-Final) 83017.pdf; C-141-Gasoline Spill Initial 8-30-17.pdf

Good Morning:

Attached are the C-141 Forms for the above referenced spills. A hard copy will also be sent today via US Mail. Should you have any questions, please call or e-mail.

Thank you,

cj

Cheryl Johnson  
Environmental Specialist

**Andeavor** - Gallup Refinery  
92 Giant Crossing Road  
Gallup, NM 87301  
505 722 0231 Direct  
505 863-0930 Fax  
505 722 3833 Main  
[Cheryl.A.Johnson@andeavor.com](mailto:Cheryl.A.Johnson@andeavor.com)

August 30, 2017

Mr. John Kieling, Chief  
New Mexico Environmental Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

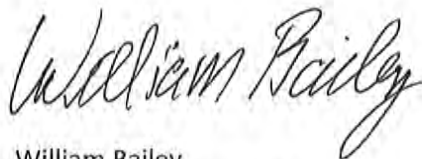
RE: SPILL AND RELEASE REPORTING REQUIREMENTS  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211; WRG-17-MISC

Dear Mr. Kieling:

Enclosed are the initial C-141 Reports for releases that occurred on March 26, 2017, (Naphtha Release) and on May 7, 2017 (Gasoline release at the railroad rack). Although both releases were verbally reported to both the NMED-HWB and the NM-OCD, the initial C-141 Form reporting both releases was not completed and forwarded to both agencies as required by Permit Section II.C.3, and subsequent permit modification (Section IV-B.4.a).

Please contact me or Cheryl Johnson, Environmental Specialist (505) 722-0231, should you have any questions.

Sincerely,



William Bailey  
Environmental Supervisor  
William.M.Bailey@andavor.com  
505-726-9473

Attachments

cc: C Chavez – NM-OCD  
K Van Horn – NM-HWB  
C Johnson – WNR-GLP  
A Haines - WNR-El Paso



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141  
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

## Release Notification and Corrective Action

### OPERATOR

☒ Initial Report ☒ Final Report

Name of Company: Western Refining	Contact: Cheryl Johnson
Address: I-40 Exit 39, Jamestown, NM 87347	Telephone No: 505 722 0231
Facility Name: Gallup Refinery	Facility Type: Petroleum Refinery

Surface Owner	Mineral Owner	API No.
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### LOCATION OF RELEASE

Unit Letter	Section 28	Township 15N	Range 15W	Feet from the	North/South Line	Feet from the	East/West Line	County McKinley
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Latitude 35°29'20.29"N Longitude 108°25'41.13"W NAD83

### NATURE OF RELEASE


Type of Release: Sour Naphtha	Volume of Release: < 5 bbls	Volume Recovered: None
Source of Release: Underground pipe leak	Date and Hour of Occurrence: 03/26/17 @ 10:00 AM	Date and Hour of Discovery: 03/26/17 @ 10:00 AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? C Smith/NMED	
By Whom? Bill Bailey	Date and Hour: 03/27/17 @ 10:00 AM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\* N/A

Describe Cause of Problem and Remedial Action Taken.\* While operator was making his rounds, he smelled naphtha in the air and found a saturated area in the middle of the road where the naphtha was seeping up from the ground (See Figure 1,) and flowed in a westerly direction down the road for approximately 332 feet. Operator notified RSM, Environmental and Kurtz who responded by applying foam to the area to minimize vapors. Operator immediately isolated the line by blocking in valves. Area was isolated and taped off. Maintenance was notified to install earthen berms to control the flow of the spill. No injuries or fires were reported from this release.

Describe Area Affected and Cleanup Action Taken.\* Area of the seep was approximately 4 ft x 4 ft section in the middle of the road. Area was excavated to a depth of 4 feet and found an underground 3 inch carbon steel pipe (sour naphtha line to Tank 567) with a 1 inch corroded hole. Maintenance replaced the damaged section of the line. The impacted soil surrounding the area was excavated and placed inside 30 yard bins for disposal. Six locations inside the excavated area were sampled (Figure 2) and sent off for analysis. Based on the analytical (Attachment A), the soil was treated as a hazardous waste (D018), soil with Benzene and sent offsite for disposal. Copies of the manifest are attached (Attachment B). The area was backfilled with clean soil and roadway was re-opened. All impacted soil from the spill was cleaned up from the site and disposed of.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Cheryl Johnson	Approved by Environmental Specialist:		
Title: Environmental Specialist	Approval Date:	Expiration Date:	
E-mail Address: Cheryl.a.johnson@andeavor.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 08-30-2017	Phone: 505-722-0231		

\* Attach Additional Sheets If Necessary

**FIGURE 1**



**Flow of sour naphtha leak – downward slope of road in a westerly direction.**

**FIGURE 2**



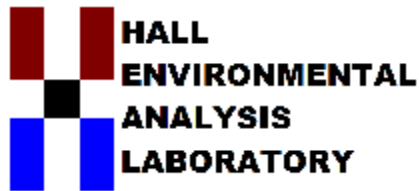
**Sample Locations:**

1. Bottom near break
2. Bottom near break
3. East wall near break
4. West wall near break
5. West wall (8 to 10 ft.) from break
6. West wall (8 to 10 ft.) from break

**Excavated area: (Estimated at 20 ft. x 4 ft. x 4 ft. deep)**

**Pipe: 3" carbon steel pipe with a 1 inch diameter corroded hole.**

## **ATTACHMENT A**



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [www.hallenvironmental.com](http://www.hallenvironmental.com)

April 21, 2017

William Bailey  
Western Refining Southwest, Gallup  
Rt. 3 Box 7  
Gallup, NM 87301  
TEL:  
FAX

RE: Naptha Line Spill

OrderNo.: 1704176

Dear William Bailey:

Hall Environmental Analysis Laboratory received 6 sample(s) on 4/5/2017 for the analyses presented in the following report.

This report is a revised report and it replaces the original report issued April 13, 2017.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. All samples are reported as received unless otherwise indicated.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Freeman', with a stylized flourish at the end.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order 1704176

Date Reported: 4/21/2017

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #1

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:30:00 AM

**Lab ID:** 1704176-001

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>JME</b>	
Diesel Range Organics (DRO)	25	1.4	8.8		mg/Kg	1	4/10/2017 1:46:18 PM	31151
Motor Oil Range Organics (MRO)	ND	44	44		mg/Kg	1	4/10/2017 1:46:18 PM	31151
Surr: DNOP	112	0	70-130		%Rec	1	4/10/2017 1:46:18 PM	31151
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>	
Gasoline Range Organics (GRO)	4200	110	500		mg/Kg	100	4/6/2017 8:36:44 PM	31106
Surr: BFB	139	0	54-150		%Rec	100	4/6/2017 8:36:44 PM	31106
<b>EPA METHOD 8310: PAHS</b>							Analyst: <b>SCC</b>	
Naphthalene	0.13	0.035	0.25	J	mg/Kg	1	4/10/2017 6:52:53 AM	31138
1-Methylnaphthalene	ND	0.025	0.25		mg/Kg	1	4/10/2017 6:52:53 AM	31138
2-Methylnaphthalene	ND	0.025	0.25		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Acenaphthylene	ND	0.021	0.25		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Acenaphthene	ND	0.024	0.25		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Fluorene	ND	0.0022	0.030		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Phenanthrene	0.058	0.0012	0.015		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Anthracene	0.019	0.0011	0.015		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Fluoranthene	0.065	0.0020	0.020		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Pyrene	0.076	0.0024	0.025		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Benz(a)anthracene	0.031	0.00059	0.020		mg/Kg	2	4/10/2017 11:55:16 AM	31138
Chrysene	0.017	0.0014	0.0099		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Benzo(b)fluoranthene	0.017	0.00049	0.0099		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Benzo(k)fluoranthene	0.014	0.00040	0.0099		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Benzo(a)pyrene	0.023	0.00059	0.020		mg/Kg	2	4/10/2017 11:55:16 AM	31138
Dibenz(a,h)anthracene	0.0037	0.00059	0.0099	J	mg/Kg	1	4/10/2017 6:52:53 AM	31138
Benzo(g,h,i)perylene	0.013	0.00040	0.0099		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Indeno(1,2,3-cd)pyrene	0.013	0.0024	0.0099		mg/Kg	1	4/10/2017 6:52:53 AM	31138
Surr: Benzo(e)pyrene	77.0	0	32.4-163		%Rec	1	4/10/2017 6:52:53 AM	31138
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>MRA</b>	
Chloride	270	1.3	30		mg/Kg	20	4/7/2017 3:21:41 PM	31127
Sulfate	30	7.1	30		mg/Kg	20	4/7/2017 3:21:41 PM	31127
<b>MERCURY, TCLP</b>							Analyst: <b>pmf</b>	
Mercury	ND	0.00050	0.020		mg/L	1	4/10/2017 2:08:24 PM	31159
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Arsenic	ND	0.024	5.0		mg/L	1	4/10/2017 10:43:30 AM	31140
Barium	3.1	0.0015	100	J	mg/L	1	4/10/2017 10:43:30 AM	31140
Cadmium	ND	0.00080	1.0		mg/L	1	4/10/2017 10:43:30 AM	31140
Chromium	ND	0.0030	5.0		mg/L	1	4/10/2017 10:43:30 AM	31140
Lead	ND	0.0049	5.0		mg/L	1	4/10/2017 10:43:30 AM	31140

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified



# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order **1704176**Date Reported: **4/21/2017****CLIENT:** Western Refining Southwest, Gallup**Client Sample ID:** Sample Location #1**Project:** Naptha Line Spill**Collection Date:** 3/30/2017 11:30:00 AM**Lab ID:** 1704176-001**Matrix:** SLUDGE**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Selenium	ND	0.062	1.0		mg/L	1	4/10/2017 10:43:30 AM	31140
Silver	ND	0.0021	5.0		mg/L	1	4/10/2017 10:43:30 AM	31140
<b>VOLATILES BY 8260B/1311</b>							Analyst: <b>AG</b>	
Benzene	0.64	0.10	0.50		mg/L	1	4/7/2017 2:56:48 PM	31121
2-Butanone	ND	0.20	200		mg/L	1	4/7/2017 2:56:48 PM	31121
Carbon Tetrachloride	ND	0.10	0.50		mg/L	1	4/7/2017 2:56:48 PM	31121
Chlorobenzene	ND	0.10	100		mg/L	1	4/7/2017 2:56:48 PM	31121
Chloroform	ND	0.10	6.0		mg/L	1	4/7/2017 2:56:48 PM	31121
1,4-Dichlorobenzene	ND	0.10	7.5		mg/L	1	4/7/2017 2:56:48 PM	31121
1,2-Dichloroethane (EDC)	ND	0.10	0.50		mg/L	1	4/7/2017 2:56:48 PM	31121
1,1-Dichloroethene	ND	0.10	0.70		mg/L	1	4/7/2017 2:56:48 PM	31121
Hexachlorobutadiene	ND	0.10	0.50		mg/L	1	4/7/2017 2:56:48 PM	31121
Tetrachloroethene (PCE)	ND	0.10	0.70		mg/L	1	4/7/2017 2:56:48 PM	31121
Trichloroethene (TCE)	ND	0.10	0.50		mg/L	1	4/7/2017 2:56:48 PM	31121
Vinyl chloride	ND	0.10	0.20		mg/L	1	4/7/2017 2:56:48 PM	31121
Surr: 1,2-Dichloroethane-d4	89.8	0	70-130		%Rec	1	4/7/2017 2:56:48 PM	31121
Surr: 4-Bromofluorobenzene	107	0	70-130		%Rec	1	4/7/2017 2:56:48 PM	31121
Surr: Dibromofluoromethane	100	0	70-130		%Rec	1	4/7/2017 2:56:48 PM	31121
Surr: Toluene-d8	95.6	0	70-130		%Rec	1	4/7/2017 2:56:48 PM	31121

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order 1704176

Date Reported: 4/21/2017

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #2

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:35:00 AM

**Lab ID:** 1704176-002

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>JME</b>	
Diesel Range Organics (DRO)	320	1.5	9.5		mg/Kg	1	4/10/2017 3:02:46 PM	31128
Motor Oil Range Organics (MRO)	100	47	47		mg/Kg	1	4/10/2017 3:02:46 PM	31128
Surr: DNOP	102	0	70-130		%Rec	1	4/10/2017 3:02:46 PM	31128
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>	
Gasoline Range Organics (GRO)	5900	110	500		mg/Kg	100	4/6/2017 9:00:10 PM	31106
Surr: BFB	208	0	54-150	S	%Rec	100	4/6/2017 9:00:10 PM	31106
<b>EPA METHOD 8310: PAHS</b>							Analyst: <b>SCC</b>	
Naphthalene	0.92	0.34	2.4	J	mg/Kg	1	4/10/2017 8:07:17 AM	31138
1-Methylnaphthalene	1.3	0.24	2.4	J	mg/Kg	1	4/10/2017 8:07:17 AM	31138
2-Methylnaphthalene	0.53	0.24	2.4	J	mg/Kg	1	4/10/2017 8:07:17 AM	31138
Acenaphthylene	ND	0.20	2.4		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Acenaphthene	0.70	0.23	2.4	J	mg/Kg	1	4/10/2017 8:07:17 AM	31138
Fluorene	ND	0.021	0.29		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Phenanthrene	1.5	0.023	0.29		mg/Kg	2	4/10/2017 12:26:30 PM	31138
Anthracene	0.16	0.011	0.14		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Fluoranthene	1.4	0.019	0.19		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Pyrene	1.4	0.023	0.24		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Benz(a)anthracene	0.31	0.0057	0.19		mg/Kg	2	4/10/2017 12:26:30 PM	31138
Chrysene	0.16	0.013	0.096		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Benzo(b)fluoranthene	0.16	0.0048	0.096		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Benzo(k)fluoranthene	0.098	0.0038	0.096		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Benzo(a)pyrene	0.20	0.0057	0.19		mg/Kg	2	4/10/2017 12:26:30 PM	31138
Dibenz(a,h)anthracene	0.026	0.0057	0.096	J	mg/Kg	1	4/10/2017 8:07:17 AM	31138
Benzo(g,h,i)perylene	0.12	0.0038	0.096		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Indeno(1,2,3-cd)pyrene	0.10	0.023	0.096		mg/Kg	1	4/10/2017 8:07:17 AM	31138
Surr: Benzo(e)pyrene	89.5	0	32.4-163		%Rec	1	4/10/2017 8:07:17 AM	31138
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>MRA</b>	
Chloride	560	1.3	30		mg/Kg	20	4/7/2017 3:34:05 PM	31127
Sulfate	19	7.1	30	J	mg/Kg	20	4/7/2017 3:34:05 PM	31127
<b>MERCURY, TCLP</b>							Analyst: <b>pmf</b>	
Mercury	ND	0.00050	0.020		mg/L	1	4/10/2017 2:10:11 PM	31159
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Arsenic	ND	0.024	5.0		mg/L	1	4/10/2017 10:48:04 AM	31140
Barium	3.2	0.0015	100	J	mg/L	1	4/10/2017 10:48:04 AM	31140
Cadmium	ND	0.00080	1.0		mg/L	1	4/10/2017 10:48:04 AM	31140
Chromium	ND	0.0030	5.0		mg/L	1	4/10/2017 10:48:04 AM	31140
Lead	ND	0.0049	5.0		mg/L	1	4/10/2017 10:48:04 AM	31140

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified



# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order **1704176**Date Reported: **4/21/2017****CLIENT:** Western Refining Southwest, Gallup**Client Sample ID:** Sample Location #2**Project:** Naptha Line Spill**Collection Date:** 3/30/2017 11:35:00 AM**Lab ID:** 1704176-002**Matrix:** SLUDGE**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Selenium	ND	0.062	1.0		mg/L	1	4/10/2017 10:48:04 AM	31140
Silver	ND	0.0021	5.0		mg/L	1	4/10/2017 10:48:04 AM	31140
<b>VOLATILES BY 8260B/1311</b>							Analyst: <b>AG</b>	
Benzene	0.62	0.10	0.50		mg/L	1	4/7/2017 4:23:32 PM	31121
2-Butanone	ND	0.20	200		mg/L	1	4/7/2017 4:23:32 PM	31121
Carbon Tetrachloride	ND	0.10	0.50		mg/L	1	4/7/2017 4:23:32 PM	31121
Chlorobenzene	ND	0.10	100		mg/L	1	4/7/2017 4:23:32 PM	31121
Chloroform	ND	0.10	6.0		mg/L	1	4/7/2017 4:23:32 PM	31121
1,4-Dichlorobenzene	ND	0.10	7.5		mg/L	1	4/7/2017 4:23:32 PM	31121
1,2-Dichloroethane (EDC)	ND	0.10	0.50		mg/L	1	4/7/2017 4:23:32 PM	31121
1,1-Dichloroethene	ND	0.10	0.70		mg/L	1	4/7/2017 4:23:32 PM	31121
Hexachlorobutadiene	ND	0.10	0.50		mg/L	1	4/7/2017 4:23:32 PM	31121
Tetrachloroethene (PCE)	ND	0.10	0.70		mg/L	1	4/7/2017 4:23:32 PM	31121
Trichloroethene (TCE)	ND	0.10	0.50		mg/L	1	4/7/2017 4:23:32 PM	31121
Vinyl chloride	ND	0.10	0.20		mg/L	1	4/7/2017 4:23:32 PM	31121
Surr: 1,2-Dichloroethane-d4	94.1	0	70-130		%Rec	1	4/7/2017 4:23:32 PM	31121
Surr: 4-Bromofluorobenzene	104	0	70-130		%Rec	1	4/7/2017 4:23:32 PM	31121
Surr: Dibromofluoromethane	98.2	0	70-130		%Rec	1	4/7/2017 4:23:32 PM	31121
Surr: Toluene-d8	96.4	0	70-130		%Rec	1	4/7/2017 4:23:32 PM	31121

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order 1704176

Date Reported: 4/21/2017

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #3

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:40:00 AM

**Lab ID:** 1704176-003

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>JME</b>	
Diesel Range Organics (DRO)	360	16	100		mg/Kg	10	4/10/2017 12:17:24 PM	31128
Motor Oil Range Organics (MRO)	ND	500	500		mg/Kg	10	4/10/2017 12:17:24 PM	31128
Surr: DNOP	0	0	70-130	S	%Rec	10	4/10/2017 12:17:24 PM	31128
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>	
Gasoline Range Organics (GRO)	9800	110	500		mg/Kg	100	4/6/2017 9:23:28 PM	31106
Surr: BFB	260	0	54-150	S	%Rec	100	4/6/2017 9:23:28 PM	31106
<b>EPA METHOD 8310: PAHS</b>							Analyst: <b>SCC</b>	
Naphthalene	1.3	0.34	2.4	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
1-Methylnaphthalene	1.1	0.24	2.4	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
2-Methylnaphthalene	ND	0.24	2.4		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Acenaphthylene	ND	0.20	2.4		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Acenaphthene	ND	0.23	2.4		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Fluorene	ND	0.021	0.29		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Phenanthrene	0.062	0.012	0.14	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
Anthracene	ND	0.011	0.14		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Fluoranthene	0.27	0.019	0.19		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Pyrene	0.30	0.023	0.24		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Benz(a)anthracene	0.096	0.0029	0.096		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Chrysene	0.062	0.013	0.096	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
Benzo(b)fluoranthene	0.041	0.0048	0.096	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
Benzo(k)fluoranthene	0.031	0.0038	0.096	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
Benzo(a)pyrene	0.060	0.0029	0.096	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
Dibenz(a,h)anthracene	0.017	0.0058	0.096	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
Benzo(g,h,i)perylene	0.043	0.0038	0.096	J	mg/Kg	1	4/10/2017 8:44:40 AM	31138
Indeno(1,2,3-cd)pyrene	ND	0.023	0.096		mg/Kg	1	4/10/2017 8:44:40 AM	31138
Surr: Benzo(e)pyrene	82.5	0	32.4-163		%Rec	1	4/10/2017 8:44:40 AM	31138
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>MRA</b>	
Chloride	54	1.3	30		mg/Kg	20	4/7/2017 3:46:29 PM	31127
Sulfate	15	7.1	30	J	mg/Kg	20	4/7/2017 3:46:29 PM	31127
<b>MERCURY, TCLP</b>							Analyst: <b>pmf</b>	
Mercury	ND	0.00050	0.020		mg/L	1	4/10/2017 2:11:59 PM	31159
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Arsenic	ND	0.024	5.0		mg/L	1	4/10/2017 10:49:35 AM	31140
Barium	3.3	0.0015	100	J	mg/L	1	4/10/2017 10:49:35 AM	31140
Cadmium	ND	0.00080	1.0		mg/L	1	4/10/2017 10:49:35 AM	31140
Chromium	ND	0.0030	5.0		mg/L	1	4/10/2017 10:49:35 AM	31140
Lead	ND	0.0049	5.0		mg/L	1	4/10/2017 10:49:35 AM	31140

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order **1704176**

Date Reported: **4/21/2017**

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #3

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:40:00 AM

**Lab ID:** 1704176-003

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Selenium	ND	0.062	1.0		mg/L	1	4/10/2017 10:49:35 AM	31140
Silver	ND	0.0021	5.0		mg/L	1	4/10/2017 10:49:35 AM	31140
<b>VOLATILES BY 8260B/1311</b>							Analyst: <b>AG</b>	
Benzene	0.72	0.10	0.50		mg/L	1	4/7/2017 4:52:25 PM	31121
2-Butanone	ND	0.20	200		mg/L	1	4/7/2017 4:52:25 PM	31121
Carbon Tetrachloride	ND	0.10	0.50		mg/L	1	4/7/2017 4:52:25 PM	31121
Chlorobenzene	ND	0.10	100		mg/L	1	4/7/2017 4:52:25 PM	31121
Chloroform	ND	0.10	6.0		mg/L	1	4/7/2017 4:52:25 PM	31121
1,4-Dichlorobenzene	ND	0.10	7.5		mg/L	1	4/7/2017 4:52:25 PM	31121
1,2-Dichloroethane (EDC)	ND	0.10	0.50		mg/L	1	4/7/2017 4:52:25 PM	31121
1,1-Dichloroethene	ND	0.10	0.70		mg/L	1	4/7/2017 4:52:25 PM	31121
Hexachlorobutadiene	ND	0.10	0.50		mg/L	1	4/7/2017 4:52:25 PM	31121
Tetrachloroethene (PCE)	ND	0.10	0.70		mg/L	1	4/7/2017 4:52:25 PM	31121
Trichloroethene (TCE)	ND	0.10	0.50		mg/L	1	4/7/2017 4:52:25 PM	31121
Vinyl chloride	ND	0.10	0.20		mg/L	1	4/7/2017 4:52:25 PM	31121
Surr: 1,2-Dichloroethane-d4	97.5	0	70-130		%Rec	1	4/7/2017 4:52:25 PM	31121
Surr: 4-Bromofluorobenzene	109	0	70-130		%Rec	1	4/7/2017 4:52:25 PM	31121
Surr: Dibromofluoromethane	102	0	70-130		%Rec	1	4/7/2017 4:52:25 PM	31121
Surr: Toluene-d8	93.7	0	70-130		%Rec	1	4/7/2017 4:52:25 PM	31121

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order 1704176

Date Reported: 4/21/2017

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #4

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:45:00 AM

**Lab ID:** 1704176-004

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>JME</b>	
Diesel Range Organics (DRO)	250	15	94		mg/Kg	10	4/10/2017 12:39:33 PM	31128
Motor Oil Range Organics (MRO)	ND	470	470		mg/Kg	10	4/10/2017 12:39:33 PM	31128
Surr: DNOP	0	0	70-130	S	%Rec	10	4/10/2017 12:39:33 PM	31128
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>	
Gasoline Range Organics (GRO)	7300	110	500		mg/Kg	100	4/6/2017 9:46:51 PM	31106
Surr: BFB	215	0	54-150	S	%Rec	100	4/6/2017 9:46:51 PM	31106
<b>EPA METHOD 8310: PAHS</b>							Analyst: <b>SCC</b>	
Naphthalene	0.95	0.35	2.4	J	mg/Kg	1	4/10/2017 9:15:55 AM	31138
1-Methylnaphthalene	0.90	0.24	2.4	J	mg/Kg	1	4/10/2017 9:15:55 AM	31138
2-Methylnaphthalene	ND	0.25	2.4		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Acenaphthylene	ND	0.21	2.4		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Acenaphthene	ND	0.24	2.4		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Fluorene	ND	0.022	0.29		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Phenanthrene	ND	0.012	0.15		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Anthracene	ND	0.011	0.15		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Fluoranthene	0.024	0.020	0.20	J	mg/Kg	1	4/10/2017 9:15:55 AM	31138
Pyrene	0.039	0.023	0.24	J	mg/Kg	1	4/10/2017 9:15:55 AM	31138
Benz(a)anthracene	0.0073	0.0029	0.098	J	mg/Kg	1	4/10/2017 9:15:55 AM	31138
Chrysene	ND	0.014	0.098		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Benzo(b)fluoranthene	0.0049	0.0049	0.098	J	mg/Kg	1	4/10/2017 9:15:55 AM	31138
Benzo(k)fluoranthene	ND	0.0039	0.098		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Benzo(a)pyrene	0.0073	0.0029	0.098	J	mg/Kg	1	4/10/2017 9:15:55 AM	31138
Dibenz(a,h)anthracene	ND	0.0059	0.098		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Benzo(g,h,i)perylene	0.012	0.0039	0.098	J	mg/Kg	1	4/10/2017 9:15:55 AM	31138
Indeno(1,2,3-cd)pyrene	ND	0.023	0.098		mg/Kg	1	4/10/2017 9:15:55 AM	31138
Surr: Benzo(e)pyrene	95.5	0	32.4-163		%Rec	1	4/10/2017 9:15:55 AM	31138
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>MRA</b>	
Chloride	750	1.3	30		mg/Kg	20	4/7/2017 3:58:53 PM	31127
Sulfate	34	7.1	30		mg/Kg	20	4/7/2017 3:58:53 PM	31127
<b>MERCURY, TCLP</b>							Analyst: <b>pmf</b>	
Mercury	ND	0.00050	0.020		mg/L	1	4/10/2017 2:13:47 PM	31159
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Arsenic	ND	0.024	5.0		mg/L	1	4/10/2017 10:51:05 AM	31140
Barium	3.5	0.0015	100	J	mg/L	1	4/10/2017 10:51:05 AM	31140
Cadmium	ND	0.00080	1.0		mg/L	1	4/10/2017 10:51:05 AM	31140
Chromium	ND	0.0030	5.0		mg/L	1	4/10/2017 10:51:05 AM	31140
Lead	ND	0.0049	5.0		mg/L	1	4/10/2017 10:51:05 AM	31140

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order **1704176**

Date Reported: **4/21/2017**

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #4

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:45:00 AM

**Lab ID:** 1704176-004

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Selenium	ND	0.062	1.0		mg/L	1	4/10/2017 10:51:05 AM	31140
Silver	ND	0.0021	5.0		mg/L	1	4/10/2017 10:51:05 AM	31140
<b>EPA METHOD 8260B: VOLATILES</b>							Analyst: <b>DJF</b>	
Benzene	25	0.098	0.50	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Toluene	220	0.40	5.0	H	mg/Kg	100	4/20/2017 3:29:40 PM	31106
Ethylbenzene	120	0.35	5.0	H	mg/Kg	100	4/20/2017 3:29:40 PM	31106
Methyl tert-butyl ether (MTBE)	ND	0.15	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,2,4-Trimethylbenzene	67	0.087	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,3,5-Trimethylbenzene	28	0.063	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,2-Dichloroethane (EDC)	ND	0.10	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,2-Dibromoethane (EDB)	ND	0.13	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Naphthalene	0.83	0.10	2.0	JH	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1-Methylnaphthalene	0.45	0.071	4.0	JH	mg/Kg	20	4/20/2017 3:58:36 PM	31106
2-Methylnaphthalene	0.44	0.081	4.0	JH	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Acetone	ND	1.1	15	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Bromobenzene	ND	0.073	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Bromodichloromethane	ND	0.13	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Bromoform	ND	0.24	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Bromomethane	ND	0.17	3.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
2-Butanone	ND	0.59	10	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Carbon disulfide	ND	0.12	10	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Carbon tetrachloride	ND	0.098	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Chlorobenzene	ND	0.059	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Chloroethane	ND	0.33	2.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Chloroform	ND	0.060	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Chloromethane	ND	0.21	3.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
2-Chlorotoluene	ND	0.077	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
4-Chlorotoluene	ND	0.090	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
cis-1,2-DCE	ND	0.13	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
cis-1,3-Dichloropropene	ND	0.076	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,2-Dibromo-3-chloropropane	0.16	0.14	2.0	JH	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Dibromochloromethane	ND	0.084	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Dibromomethane	ND	0.049	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,2-Dichlorobenzene	ND	0.050	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,3-Dichlorobenzene	ND	0.088	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,4-Dichlorobenzene	ND	0.11	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Dichlorodifluoromethane	ND	0.41	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,1-Dichloroethane	ND	0.40	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,1-Dichloroethene	ND	0.40	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order 1704176

Date Reported: 4/21/2017

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #4

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:45:00 AM

**Lab ID:** 1704176-004

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 8260B: VOLATILES</b>							Analyst: DJF	
1,2-Dichloropropane	ND	0.062	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,3-Dichloropropane	ND	0.25	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
2,2-Dichloropropane	ND	0.11	2.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,1-Dichloropropene	ND	0.11	2.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Hexachlorobutadiene	ND	0.25	2.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
2-Hexanone	ND	0.19	10	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Isopropylbenzene	19	0.067	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
4-Isopropyltoluene	3.4	0.076	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
4-Methyl-2-pentanone	ND	0.21	10	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Methylene chloride	ND	0.40	3.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
n-Butylbenzene	4.0	0.089	3.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
n-Propylbenzene	27	0.062	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
sec-Butylbenzene	4.9	0.10	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Styrene	ND	0.17	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
tert-Butylbenzene	0.19	0.081	1.0	JH	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,1,1,2-Tetrachloroethane	ND	0.11	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,1,2,2-Tetrachloroethane	ND	0.29	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Tetrachloroethene (PCE)	ND	0.080	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
trans-1,2-DCE	ND	0.40	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
trans-1,3-Dichloropropene	ND	0.12	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,2,3-Trichlorobenzene	0.14	0.091	2.0	JH	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,2,4-Trichlorobenzene	0.14	0.10	1.0	JH	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,1,1-Trichloroethane	ND	0.13	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,1,2-Trichloroethane	ND	0.11	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Trichloroethene (TCE)	ND	0.12	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Trichlorofluoromethane	ND	0.15	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
1,2,3-Trichloropropane	ND	0.50	2.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Vinyl chloride	ND	0.083	1.0	H	mg/Kg	20	4/20/2017 3:58:36 PM	31106
Xylenes, Total	330	1.6	10	H	mg/Kg	100	4/20/2017 3:29:40 PM	31106
Surr: Dibromofluoromethane	70.6		70-130	H	%Rec	20	4/20/2017 3:58:36 PM	31106
Surr: 1,2-Dichloroethane-d4	88.4		70-130	H	%Rec	20	4/20/2017 3:58:36 PM	31106
Surr: Toluene-d8	105		70-130	H	%Rec	20	4/20/2017 3:58:36 PM	31106
Surr: 4-Bromofluorobenzene	101		70-130	H	%Rec	20	4/20/2017 3:58:36 PM	31106
<b>VOLATILES BY 8260B/1311</b>							Analyst: rde	
Benzene	0.88	0.10	0.50		mg/L	1	4/10/2017 1:42:00 PM	31139
2-Butanone	ND	0.20	200		mg/L	1	4/10/2017 1:42:00 PM	31139
Carbon Tetrachloride	ND	0.10	0.50		mg/L	1	4/10/2017 1:42:00 PM	31139
Chlorobenzene	ND	0.10	100		mg/L	1	4/10/2017 1:42:00 PM	31139
Chloroform	ND	0.10	6.0		mg/L	1	4/10/2017 1:42:00 PM	31139

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

**Hall Environmental Analysis Laboratory, Inc.****CLIENT:** Western Refining Southwest, Gallup**Client Sample ID:** Sample Location #4**Project:** Naptha Line Spill**Collection Date:** 3/30/2017 11:45:00 AM**Lab ID:** 1704176-004**Matrix:** SLUDGE**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>VOLATILES BY 8260B/1311</b>							Analyst: rde	
1,4-Dichlorobenzene	ND	0.10	7.5		mg/L	1	4/10/2017 1:42:00 PM	31139
1,2-Dichloroethane (EDC)	ND	0.10	0.50		mg/L	1	4/10/2017 1:42:00 PM	31139
1,1-Dichloroethene	ND	0.10	0.70		mg/L	1	4/10/2017 1:42:00 PM	31139
Hexachlorobutadiene	ND	0.10	0.50		mg/L	1	4/10/2017 1:42:00 PM	31139
Tetrachloroethene (PCE)	ND	0.10	0.70		mg/L	1	4/10/2017 1:42:00 PM	31139
Trichloroethene (TCE)	ND	0.10	0.50		mg/L	1	4/10/2017 1:42:00 PM	31139
Vinyl chloride	ND	0.10	0.20		mg/L	1	4/10/2017 1:42:00 PM	31139
Surr: 1,2-Dichloroethane-d4	83.0	0	70-130		%Rec	1	4/10/2017 1:42:00 PM	31139
Surr: 4-Bromofluorobenzene	101	0	70-130		%Rec	1	4/10/2017 1:42:00 PM	31139
Surr: Dibromofluoromethane	100	0	70-130		%Rec	1	4/10/2017 1:42:00 PM	31139
Surr: Toluene-d8	94.3	0	70-130		%Rec	1	4/10/2017 1:42:00 PM	31139

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order 1704176

Date Reported: 4/21/2017

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #5

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:50:00 AM

**Lab ID:** 1704176-005

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>								Analyst: <b>JME</b>
Diesel Range Organics (DRO)	70	1.6	10		mg/Kg	1	4/10/2017 2:34:32 PM	31128
Motor Oil Range Organics (MRO)	ND	52	52		mg/Kg	1	4/10/2017 2:34:32 PM	31128
Surr: DNOP	93.8	0	70-130		%Rec	1	4/10/2017 2:34:32 PM	31128
<b>EPA METHOD 8015D: GASOLINE RANGE</b>								Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	3000	110	500		mg/Kg	100	4/6/2017 10:10:07 PM	31106
Surr: BFB	121	0	54-150		%Rec	100	4/6/2017 10:10:07 PM	31106
<b>EPA METHOD 8310: PAHS</b>								Analyst: <b>SCC</b>
Naphthalene	0.36	0.34	2.4	J	mg/Kg	1	4/10/2017 9:47:11 AM	31138
1-Methylnaphthalene	0.49	0.24	2.4	J	mg/Kg	1	4/10/2017 9:47:11 AM	31138
2-Methylnaphthalene	ND	0.24	2.4		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Acenaphthylene	ND	0.20	2.4		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Acenaphthene	ND	0.23	2.4		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Fluorene	ND	0.021	0.29		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Phenanthrene	ND	0.011	0.14		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Anthracene	ND	0.010	0.14		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Fluoranthene	0.041	0.019	0.19	J	mg/Kg	1	4/10/2017 9:47:11 AM	31138
Pyrene	0.038	0.023	0.24	J	mg/Kg	1	4/10/2017 9:47:11 AM	31138
Benz(a)anthracene	0.0072	0.0029	0.095	J	mg/Kg	1	4/10/2017 9:47:11 AM	31138
Chrysene	ND	0.013	0.095		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Benzo(b)fluoranthene	ND	0.0048	0.095		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Benzo(k)fluoranthene	ND	0.0038	0.095		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Benzo(a)pyrene	ND	0.0029	0.095		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Dibenz(a,h)anthracene	ND	0.0057	0.095		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Benzo(g,h,i)perylene	0.0072	0.0038	0.095	J	mg/Kg	1	4/10/2017 9:47:11 AM	31138
Indeno(1,2,3-cd)pyrene	ND	0.023	0.095		mg/Kg	1	4/10/2017 9:47:11 AM	31138
Surr: Benzo(e)pyrene	94.0	0	32.4-163		%Rec	1	4/10/2017 9:47:11 AM	31138
<b>EPA METHOD 300.0: ANIONS</b>								Analyst: <b>MRA</b>
Chloride	70	1.3	30		mg/Kg	20	4/7/2017 4:11:18 PM	31127
Sulfate	96	7.1	30		mg/Kg	20	4/7/2017 4:11:18 PM	31127
<b>MERCURY, TCLP</b>								Analyst: <b>pmf</b>
Mercury	ND	0.00050	0.020		mg/L	1	4/10/2017 2:15:36 PM	31159
<b>EPA METHOD 6010B: TCLP METALS</b>								Analyst: <b>MED</b>
Arsenic	ND	0.024	5.0		mg/L	1	4/10/2017 10:52:36 AM	31140
Barium	1.3	0.0015	100	J	mg/L	1	4/10/2017 10:52:36 AM	31140
Cadmium	ND	0.00080	1.0		mg/L	1	4/10/2017 10:52:36 AM	31140
Chromium	ND	0.0030	5.0		mg/L	1	4/10/2017 10:52:36 AM	31140
Lead	ND	0.0049	5.0		mg/L	1	4/10/2017 10:52:36 AM	31140

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified



# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order **1704176**

Date Reported: **4/21/2017**

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #5

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:50:00 AM

**Lab ID:** 1704176-005

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Selenium	ND	0.062	1.0		mg/L	1	4/10/2017 10:52:36 AM	31140
Silver	ND	0.0021	5.0		mg/L	1	4/10/2017 10:52:36 AM	31140
<b>VOLATILES BY 8260B/1311</b>							Analyst: <b>rde</b>	
Benzene	0.63	0.10	0.50		mg/L	1	4/10/2017 2:54:00 PM	31139
2-Butanone	ND	0.20	200		mg/L	1	4/10/2017 2:54:00 PM	31139
Carbon Tetrachloride	ND	0.10	0.50		mg/L	1	4/10/2017 2:54:00 PM	31139
Chlorobenzene	ND	0.10	100		mg/L	1	4/10/2017 2:54:00 PM	31139
Chloroform	ND	0.10	6.0		mg/L	1	4/10/2017 2:54:00 PM	31139
1,4-Dichlorobenzene	ND	0.10	7.5		mg/L	1	4/10/2017 2:54:00 PM	31139
1,2-Dichloroethane (EDC)	ND	0.10	0.50		mg/L	1	4/10/2017 2:54:00 PM	31139
1,1-Dichloroethene	ND	0.10	0.70		mg/L	1	4/10/2017 2:54:00 PM	31139
Hexachlorobutadiene	ND	0.10	0.50		mg/L	1	4/10/2017 2:54:00 PM	31139
Tetrachloroethene (PCE)	ND	0.10	0.70		mg/L	1	4/10/2017 2:54:00 PM	31139
Trichloroethene (TCE)	ND	0.10	0.50		mg/L	1	4/10/2017 2:54:00 PM	31139
Vinyl chloride	ND	0.10	0.20		mg/L	1	4/10/2017 2:54:00 PM	31139
Surr: 1,2-Dichloroethane-d4	81.6	0	70-130		%Rec	1	4/10/2017 2:54:00 PM	31139
Surr: 4-Bromofluorobenzene	103	0	70-130		%Rec	1	4/10/2017 2:54:00 PM	31139
Surr: Dibromofluoromethane	101	0	70-130		%Rec	1	4/10/2017 2:54:00 PM	31139
Surr: Toluene-d8	95.8	0	70-130		%Rec	1	4/10/2017 2:54:00 PM	31139

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	R RPD outside accepted recovery limits	RL Reporting Detection Limit
	S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order **1704176**

Date Reported: **4/21/2017**

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #6

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:55:00 AM

**Lab ID:** 1704176-006

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>JME</b>	
Diesel Range Organics (DRO)	1.7	1.6	10	J	mg/Kg	1	4/10/2017 1:23:57 PM	31128
Motor Oil Range Organics (MRO)	ND	51	51		mg/Kg	1	4/10/2017 1:23:57 PM	31128
Surr: DNOP	106	0	70-130		%Rec	1	4/10/2017 1:23:57 PM	31128
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>	
Gasoline Range Organics (GRO)	ND	1.1	5.0		mg/Kg	1	4/7/2017 12:07:09 AM	31106
Surr: BFB	89.3	0	54-150		%Rec	1	4/7/2017 12:07:09 AM	31106
<b>EPA METHOD 8310: PAHS</b>							Analyst: <b>SCC</b>	
Naphthalene	ND	0.036	0.25		mg/Kg	1	4/10/2017 10:19:59 AM	31138
1-Methylnaphthalene	ND	0.025	0.25		mg/Kg	1	4/10/2017 10:19:59 AM	31138
2-Methylnaphthalene	ND	0.025	0.25		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Acenaphthylene	ND	0.021	0.25		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Acenaphthene	ND	0.024	0.25		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Fluorene	ND	0.0022	0.030		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Phenanthrene	ND	0.0012	0.015		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Anthracene	ND	0.0011	0.015		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Fluoranthene	ND	0.0020	0.020		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Pyrene	0.0040	0.0024	0.025	J	mg/Kg	1	4/10/2017 10:19:59 AM	31138
Benz(a)anthracene	0.00075	0.00030	0.010	J	mg/Kg	1	4/10/2017 10:19:59 AM	31138
Chrysene	ND	0.0014	0.010		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Benzo(b)fluoranthene	0.00050	0.00050	0.010	J	mg/Kg	1	4/10/2017 10:19:59 AM	31138
Benzo(k)fluoranthene	ND	0.00040	0.010		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Benzo(a)pyrene	0.00050	0.00030	0.010	J	mg/Kg	1	4/10/2017 10:19:59 AM	31138
Dibenz(a,h)anthracene	ND	0.00060	0.010		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Benzo(g,h,i)perylene	0.00050	0.00040	0.010	J	mg/Kg	1	4/10/2017 10:19:59 AM	31138
Indeno(1,2,3-cd)pyrene	ND	0.0024	0.010		mg/Kg	1	4/10/2017 10:19:59 AM	31138
Surr: Benzo(e)pyrene	44.1	0	32.4-163		%Rec	1	4/10/2017 10:19:59 AM	31138
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>MRA</b>	
Chloride	120	1.3	30		mg/Kg	20	4/7/2017 4:48:32 PM	31127
Sulfate	95	7.1	30		mg/Kg	20	4/7/2017 4:48:32 PM	31127
<b>MERCURY, TCLP</b>							Analyst: <b>pmf</b>	
Mercury	ND	0.00050	0.020		mg/L	1	4/10/2017 2:21:06 PM	31159
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Arsenic	ND	0.024	5.0		mg/L	1	4/10/2017 11:17:23 AM	31140
Barium	2.5	0.0015	100	J	mg/L	1	4/10/2017 11:17:23 AM	31140
Cadmium	ND	0.00080	1.0		mg/L	1	4/10/2017 11:17:23 AM	31140
Chromium	ND	0.0030	5.0		mg/L	1	4/10/2017 11:17:23 AM	31140
Lead	ND	0.0049	5.0		mg/L	1	4/10/2017 11:17:23 AM	31140

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

## Analytical Report

Lab Order **1704176**

Date Reported: **4/21/2017**

**CLIENT:** Western Refining Southwest, Gallup

**Client Sample ID:** Sample Location #6

**Project:** Naptha Line Spill

**Collection Date:** 3/30/2017 11:55:00 AM

**Lab ID:** 1704176-006

**Matrix:** SLUDGE

**Received Date:** 4/5/2017 2:18:00 PM

Analyses	Result	MDL	PQL	Qual	Units	DF	Date Analyzed	Batch ID
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>	
Selenium	ND	0.062	1.0		mg/L	1	4/10/2017 11:17:23 AM	31140
Silver	ND	0.0021	5.0		mg/L	1	4/10/2017 11:17:23 AM	31140
<b>EPA METHOD 8260B: TCLP COMPOUNDS</b>							Analyst: <b>DJF</b>	
Benzene	ND	0.049	0.50		ppm	10	4/6/2017 2:15:16 PM	31106
1,2-Dichloroethane (EDC)	ND	0.052	0.50		ppm	10	4/6/2017 2:15:16 PM	31106
2-Butanone	ND	0.30	200		ppm	10	4/6/2017 2:15:16 PM	31106
Carbon tetrachloride	ND	0.049	0.50		ppm	10	4/6/2017 2:15:16 PM	31106
Chlorobenzene	ND	0.030	100		ppm	10	4/6/2017 2:15:16 PM	31106
Chloroform	ND	0.030	6.0		ppm	10	4/6/2017 2:15:16 PM	31106
1,4-Dichlorobenzene	ND	0.055	7.5		ppm	10	4/6/2017 2:15:16 PM	31106
1,1-Dichloroethene	ND	0.20	0.70		ppm	10	4/6/2017 2:15:16 PM	31106
Tetrachloroethene (PCE)	ND	0.040	0.70		ppm	10	4/6/2017 2:15:16 PM	31106
Trichloroethene (TCE)	ND	0.060	0.50		ppm	10	4/6/2017 2:15:16 PM	31106
Vinyl chloride	ND	0.042	0.20		ppm	10	4/6/2017 2:15:16 PM	31106
Surr: 1,2-Dichloroethane-d4	109		70-130		%Rec	10	4/6/2017 2:15:16 PM	31106
Surr: 4-Bromofluorobenzene	89.7		70-130		%Rec	10	4/6/2017 2:15:16 PM	31106
Surr: Dibromofluoromethane	106		70-130		%Rec	10	4/6/2017 2:15:16 PM	31106
Surr: Toluene-d8	98.4		70-130		%Rec	10	4/6/2017 2:15:16 PM	31106

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified



Collected date/time: 03/30/17 11:30

L901160

## Wet Chemistry by Method 9012 B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Cyanide	ND		0.250	1	04/10/2017 09:14	<u>WG968433</u>

## Wet Chemistry by Method 9034-9030B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Sulfide	ND		25.0	1	04/07/2017 19:15	<u>WG968481</u>

## Wet Chemistry by Method 9045D

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Corrosivity by pH	9.68	<u>T&amp;</u>	1	04/08/2017 11:27	<u>WG968631</u>

## Sample Narrative:

9045D L901160-01 WG968631: 9.68 at 20.0c

## Wet Chemistry by Method D93/1010A

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Ignitability	128		1	04/07/2017 19:00	<u>WG968557</u>





## Wet Chemistry by Method 9012 B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Cyanide	ND		0.250	1	04/10/2017 09:15	WG968433

## Wet Chemistry by Method 9034-9030B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Sulfide	42.7		25.0	1	04/07/2017 19:15	WG968481

## Wet Chemistry by Method 9045D

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Corrosivity by pH	8.86	T&	1	04/08/2017 11:27	WG968631

## Sample Narrative:

9045D L901160-02 WG968631: 8.86 at 19.8c

## Wet Chemistry by Method D93/1010A

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Ignitability	77.7		1	04/07/2017 19:00	WG968557





Collected date/time: 03/30/17 11:40

L901160

## Wet Chemistry by Method 9012 B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Cyanide	ND		0.250	1	04/10/2017 09:17	WG968433

## Wet Chemistry by Method 9034-9030B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Sulfide	ND		25.0	1	04/07/2017 19:15	WG968481

## Wet Chemistry by Method 9045D

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Corrosivity by pH	9.19	T&S	1	04/08/2017 11:27	WG968631

## Sample Narrative:

9045D L901160-03 WG968631: 9.19 at 20.0c

## Wet Chemistry by Method D93/1010A

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Ignitability	69.7		1	04/07/2017 19:00	WG968557





Collected date/time: 03/30/17 11:45

L901160

## Wet Chemistry by Method 9012 B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Cyanide	ND		0.250	1	04/10/2017 09:18	WG968433

## Wet Chemistry by Method 9034-9030B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Sulfide	36.6		25.0	1	04/07/2017 19:15	WG968481

## Wet Chemistry by Method 9045D

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Corrosivity by pH	9.40	T&E	1	04/08/2017 11:27	WG968631

## Sample Narrative:

9045D L901160-04 WG968631: 9.40 at 20.0c

## Wet Chemistry by Method D93/1010A

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Ignitability	76.5		1	04/07/2017 19:00	WG968557





Collected date/time: 03/30/17 11:50

L901160

## Wet Chemistry by Method 9012 B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Cyanide	ND		0.250	1	04/10/2017 09:19	WG968433

## Wet Chemistry by Method 9034-9030B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Sulfide	ND		25.0	1	04/07/2017 19:15	WG968481

## Wet Chemistry by Method 9045D

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Corrosivity by pH	8.40	T6	1	04/08/2017 11:27	WG968631

## Sample Narrative:

9045D L901160-05 WG968631: 8.40 at 20.2c

## Wet Chemistry by Method D93/1010A

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Ignitability	Deg. F 123		1	04/07/2017 19:00	WG968557







Collected date/time: 03/30/17 11:55

L901160

## Wet Chemistry by Method 9012 B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Cyanide	ND		0.250	1	04/10/2017 09:21	WG968433

## Wet Chemistry by Method 9034-9030B

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Reactive Sulfide	ND		25.0	1	04/07/2017 19:15	WG968481

## Wet Chemistry by Method 9045D

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Corrosivity by pH	8.67	TS	1	04/08/2017 11:27	WG968631

## Sample Narrative:

9045D L901160-06 WG968631: 8.67 at 20.4c

## Wet Chemistry by Method D93/1010A

Analyte	Result	Qualifier	Dilution	Analysis date / time	Batch
Ignitability	DNI at 170		1	04/07/2017 19:00	WG968557



Method Blank (MB)

(MB) R3209490-1 04/10/17 08:51

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Reactive Cyanide	U		0.039	0.250

L901165-01 Original Sample (OS) • Duplicate (DUP)

(OS) L901165-01 04/10/17 09:25 • (DUP) R3209490-7 04/10/17 09:26

Analyte	Original Result mg/kg	DUP Result mg/kg	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Reactive Cyanide	ND	0.000	1	200	PI	20

L901035-08 Original Sample (OS) • Duplicate (DUP)

(OS) L901035-08 04/10/17 09:01 • (DUP) R3209490-10 04/10/17 09:12

Analyte	Original Result mg/kg	DUP Result mg/kg	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Reactive Cyanide	ND	0.000	1	0		20

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3209490-2 04/10/17 08:53 • (LCSD) R3209490-3 04/10/17 08:54

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Reactive Cyanide	2.50	2.48	2.45	99	98	50-150			1	20

L901035-16 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L901035-16 04/10/17 09:10 • (MS) R3209490-9 04/10/17 09:11 • (MSD) R3209490-8 04/10/17 09:03

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Reactive Cyanide	1.67	ND	1.52	1.57	87	90	1	75-125			3	20



Method Blank (MB)

(MB) WG968481-1 04/07/17 19:15

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Reactive Sulfide	U		7.63	25.0

L901160-06 Original Sample (OS) • Duplicate (DUP)

(OS) L901160-06 04/07/17 19:15 • (DUP) WG968481-4 04/07/17 19:15

Analyte	Original Result mg/kg	DUP Result mg/kg	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Reactive Sulfide	ND	ND	1	0.000		20

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) WG968481-2 04/07/17 19:15 • (LCSD) WG968481-3 04/07/17 19:15

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCSD Result mg/kg	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Reactive Sulfide	100	73.3	79.4	73.3	79.4	70.0-130			7.99	20

Tc

Ss

Cn

Sr

Cc

Gl

Al

Sc



L900577-01 Original Sample (OS) • Duplicate (DUP)

(OS) L900577-01 04/08/17 11:27 • (DUP) WG968631-3 04/08/17 11:27

Analyte	Original Result su	DUP Result su	Dilution	DUP RPD %	DUP Qualifier T <sub>2</sub>	DUP RPD Limits %
Corrosivity by pH	6.74	6.72	1	0.297	T <sub>2</sub>	1

L901160-06 Original Sample (OS) • Duplicate (DUP)

(OS) L901160-06 04/08/17 11:27 • (DUP) WG968631-4 04/08/17 11:27

Analyte	Original Result su	DUP Result su	Dilution	DUP RPD %	DUP Qualifier T <sub>2</sub>	DUP RPD Limits %
Corrosivity by pH	8.67	8.68	1	0.115	T <sub>2</sub>	1

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) WG968631-1 04/08/17 11:27 • (LCSD) WG968631-2 04/08/17 11:27

Analyte	Spike Amount su	LCS Result su	LCSD Result su	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier %	LCSD Qualifier %	RPD %	RPD Limits %
Corrosivity by pH	7.50	7.54	7.56	101	101	98.4-102		0.265	1	

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc



L899835-08 Original Sample (OS) • Duplicate (DUP)

(OS) L899835-08 04/07/17 19:00 • (DUP) R3209250-3 04/07/17 19:00						
Analyte	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Ignitability	Deg. F	Deg. F	%	%	%	%
	DNI at 170	DNI at 170	1	0.000		10

L901160-01 Original Sample (OS) • Duplicate (DUP)

(OS) L901160-01 04/07/17 19:00 • (DUP) R3209250-4 04/07/17 19:00						
Analyte	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Ignitability	Deg. F	Deg. F	%	%	%	%
	128	126	1	1.00		10

L901160-02 Original Sample (OS) • Duplicate (DUP)

(OS) L901160-02 04/07/17 19:00 • (DUP) R3209250-5 04/07/17 19:00						
Analyte	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Ignitability	Deg. F	Deg. F	%	%	%	%
	77.7	80.0	1	3.00		10

L901160-03 Original Sample (OS) • Duplicate (DUP)

(OS) L901160-03 04/07/17 19:00 • (DUP) R3209250-6 04/07/17 19:00						
Analyte	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Ignitability	Deg. F	Deg. F	%	%	%	%
	69.7	70.0	1	0.000		10

L901160-04 Original Sample (OS) • Duplicate (DUP)

(OS) L901160-04 04/07/17 19:00 • (DUP) R3209250-7 04/07/17 19:00						
Analyte	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Ignitability	Deg. F	Deg. F	%	%	%	%
	76.5	75.6	1	1.00		10

L901160-05 Original Sample (OS) • Duplicate (DUP)

(OS) L901160-05 04/07/17 19:00 • (DUP) R3209250-8 04/07/17 19:00						
Analyte	Original Result	DUP Result	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Ignitability	Deg. F	Deg. F	%	%	%	%
	123	126	1	2.00		10



Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3209250-1 04/07/17 19:00 • (LCSD) R3209250-2 04/07/17 19:00

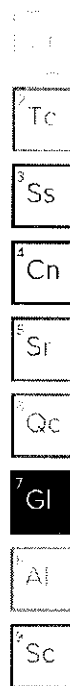
Analyte	Spike Amount		LCS Result		LCSD Result		LCS Rec.		LCSD Rec.		Rec. Limits		<u>LCS Qualifier</u>		<u>LCSD Qualifier</u>		RPD		RPD Limits	
	Deg. F		Deg. F		Deg. F		%		%		%		%		%		%	%		
Ignitability	82.0		80.4		80.7		98.0		98.0		96.0-104				0.000		10			



## Abbreviations and Definitions

SDG	Sample Delivery Group.
MDL	Method Detection Limit.
RDL	Reported Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
U	Not detected at the Reporting Limit (or MDL where applicable).
RPD	Relative Percent Difference.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Rec.	Recovery.

Qualifier	Description
P1	RPD value not applicable for sample concentrations less than 5 times the reporting limit.
T8	Sample(s) received past/too close to holding time expiration.



# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	MB-31127		SampType:	MBLK		TestCode:	EPA Method 300.0: Anions				
Client ID:	PBS		Batch ID:	31127		RunNo:	41969				
Prep Date:	4/7/2017		Analysis Date:	4/7/2017		SeqNo:	1318741		Units:	mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Chloride	ND	1.5									
Sulfate	ND	1.5									

Sample ID	LCS-31127		SampType: LCS		TestCode: EPA Method 300.0: Anions					
Client ID:	LCSS		Batch ID: 31127		RunNo: 41969					
Prep Date:	4/7/2017		Analysis Date: 4/7/2017		SeqNo: 1318742		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	96.6	90	110			
Sulfate	29	1.5	30.00	0	97.6	90	110			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
R RPD outside accepted recovery limits  
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank  
E Value above quantitation range  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified



# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	MB-31128	SampType:	MBLK		TestCode:	EPA Method 8015M/D: Diesel Range Organics				
Client ID:	PBS	Batch ID:	31128		RunNo:	41990				
Prep Date:	4/7/2017	Analysis Date:	4/10/2017		SeqNo:	1318833		Units:	mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	11		10.00		110	70	130			

Sample ID	MB-31151	SampType: MBLK			TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID: 31151			RunNo: 41990					
Prep Date:	4/10/2017	Analysis Date: 4/10/2017			SeqNo: 1318834		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	10		10.00		102	70	130			

Sample ID	LCS-31128		SampType: LCS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 31128		RunNo: 41990					
Prep Date:	4/7/2017		Analysis Date: 4/10/2017		SeqNo: 1318835		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	52	10	50.00	0	104	63.8	116			
Surr: DNOP	5.0		5.000		99.7	70	130			

Sample ID	LCS-31151		SampType: LCS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 31151		RunNo: 41990					
Prep Date:	4/10/2017		Analysis Date: 4/10/2017		SeqNo: 1318836		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	50	10	50.00	0	100	63.8	116			
Surr: DNOP	4.9		5.000		97.1	70	130			

Sample ID	1704176-001AMS		SampType: MS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	Sample Location #1		Batch ID: 31128		RunNo: 41990					
Prep Date:	4/7/2017		Analysis Date: 4/10/2017		SeqNo: 1319273		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	220	9.3	46.51	25.23	420	51.6	130			S
Surr: DNOP	4.9		4.651		104	70	130			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
R RPD outside accepted recovery limits  
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank  
E Value above quantitation range  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	1704176-001AMSD	SampType:	MSD	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	Sample Location #1	Batch ID:	31128	RunNo:	41990					
Prep Date:	4/7/2017	Analysis Date:	4/10/2017	SeqNo:	1319318	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	290	10	51.02	25.23	522	51.6	130	27.7	20	RS
Surr: DNOP	5.7		5.102		111	70	130	0	0	

Sample ID	LCS-31157	SampType:	LCS	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	31157	RunNo:	42017					
Prep Date:	4/10/2017	Analysis Date:	4/11/2017	SeqNo:	1319773	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	5.1		5.000		102	70	130			

Sample ID	MB-31157	SampType:	MBLK	TestCode:	EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	31157	RunNo:	42017					
Prep Date:	4/10/2017	Analysis Date:	4/11/2017	SeqNo:	1319775	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	11		10.00		110	70	130			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
R RPD outside accepted recovery limits  
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank  
E Value above quantitation range  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	MB-31106		SampType: MBLK		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	PBS		Batch ID: 31106		RunNo: 41937					
Prep Date:	4/5/2017		Analysis Date: 4/6/2017		SeqNo: 1317204		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	890		1000		88.6	54	150			

Sample ID	LCS-31106		SampType: LCS		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	LCSS		Batch ID: 31106		RunNo: 41937					
Prep Date:	4/5/2017		Analysis Date: 4/6/2017		SeqNo: 1317205		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	26	5.0	25.00	0	103	76.4	125			
Surr: BFB	990		1000		98.9	54	150			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
R RPD outside accepted recovery limits  
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank  
E Value above quantitation range  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	mb-31106	SampType: MBLK			TestCode: EPA Method 8260B: Volatiles					
Client ID:	PBS	Batch ID: 31106			RunNo: 41936					
Prep Date:	4/5/2017	Analysis Date: 4/6/2017			SeqNo: 1328109		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Methyl tert-butyl ether (MTBE)	ND	0.050								
1,2,4-Trimethylbenzene	ND	0.050								
1,3,5-Trimethylbenzene	ND	0.050								
1,2-Dichloroethane (EDC)	ND	0.050								
1,2-Dibromoethane (EDB)	ND	0.050								
Naphthalene	ND	0.10								
1-Methylnaphthalene	ND	0.20								
2-Methylnaphthalene	ND	0.20								
Acetone	ND	0.75								
Bromobenzene	ND	0.050								
Bromodichloromethane	ND	0.050								
Bromoform	ND	0.050								
Bromomethane	ND	0.15								
2-Butanone	ND	0.50								
Carbon disulfide	ND	0.50								
Carbon tetrachloride	ND	0.050								
Chlorobenzene	ND	0.050								
Chloroethane	ND	0.10								
Chloroform	ND	0.050								
Chloromethane	ND	0.15								
2-Chlorotoluene	ND	0.050								
4-Chlorotoluene	ND	0.050								
cis-1,2-DCE	ND	0.050								
cis-1,3-Dichloropropene	ND	0.050								
1,2-Dibromo-3-chloropropane	ND	0.10								
Dibromochloromethane	ND	0.050								
Dibromomethane	ND	0.050								
1,2-Dichlorobenzene	ND	0.050								
1,3-Dichlorobenzene	ND	0.050								
1,4-Dichlorobenzene	ND	0.050								
Dichlorodifluoromethane	ND	0.050								
1,1-Dichloroethane	ND	0.050								
1,1-Dichloroethene	ND	0.050								
1,2-Dichloropropane	ND	0.050								
1,3-Dichloropropane	ND	0.050								
2,2-Dichloropropane	ND	0.10								

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH Not In Range

RL Reporting Detection Limit

W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	<b>mb-31106</b>		SampType:	<b>MBLK</b>		TestCode:	<b>EPA Method 8260B: Volatiles</b>			
Client ID:	<b>PBS</b>		Batch ID:	<b>31106</b>		RunNo:	<b>41936</b>			
Prep Date:	<b>4/5/2017</b>		Analysis Date:	<b>4/6/2017</b>		SeqNo:	<b>1328109</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
1,1-Dichloropropene	ND	0.10								
Hexachlorobutadiene	ND	0.10								
2-Hexanone	ND	0.50								
Isopropylbenzene	ND	0.050								
4-Isopropyltoluene	ND	0.050								
4-Methyl-2-pentanone	ND	0.50								
Methylene chloride	ND	0.15								
n-Butylbenzene	ND	0.15								
n-Propylbenzene	ND	0.050								
sec-Butylbenzene	ND	0.050								
Styrene	ND	0.050								
tert-Butylbenzene	ND	0.050								
1,1,1,2-Tetrachloroethane	ND	0.050								
1,1,2,2-Tetrachloroethane	ND	0.050								
Tetrachloroethene (PCE)	ND	0.050								
trans-1,2-DCE	ND	0.050								
trans-1,3-Dichloropropene	ND	0.050								
1,2,3-Trichlorobenzene	ND	0.10								
1,2,4-Trichlorobenzene	ND	0.050								
1,1,1-Trichloroethane	ND	0.050								
1,1,2-Trichloroethane	ND	0.050								
Trichloroethene (TCE)	ND	0.050								
Trichlorofluoromethane	ND	0.050								
1,2,3-Trichloropropane	ND	0.10								
Vinyl chloride	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: Dibromofluoromethane	0.54		0.5000		108	70	130			
Surr: 1,2-Dichloroethane-d4	0.54		0.5000		108	70	130			
Surr: Toluene-d8	0.49		0.5000		97.9	70	130			
Surr: 4-Bromofluorobenzene	0.45		0.5000		90.7	70	130			

Sample ID	<b>ics-31106</b>		SampType:	<b>LCS</b>		TestCode:	<b>EPA Method 8260B: Volatiles</b>			
Client ID:	<b>LCSS</b>		Batch ID:	<b>31106</b>		RunNo:	<b>41936</b>			
Prep Date:	<b>4/5/2017</b>		Analysis Date:	<b>4/6/2017</b>		SeqNo:	<b>1328110</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.025	1.000	0	110	70	130			
Toluene	0.98	0.050	1.000	0	97.8	70	130			
Chlorobenzene	0.95	0.050	1.000	0	95.4	70	130			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH Not In Range

RL Reporting Detection Limit

W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	lcs-31106		SampType: LCS		TestCode: EPA Method 8260B: Volatiles					
Client ID:	LCSS		Batch ID: 31106		RunNo: 41936					
Prep Date:	4/5/2017		Analysis Date: 4/6/2017		SeqNo: 1328110		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
1,1-Dichloroethene	1.1	0.050	1.000	0	114	72	146			
Trichloroethene (TCE)	1.0	0.050	1.000	0	100	70	130			
Surr: Dibromofluoromethane	0.51		0.5000		103	70	130			
Surr: 1,2-Dichloroethane-d4	0.54		0.5000		109	70	130			
Surr: Toluene-d8	0.49		0.5000		99.0	70	130			
Surr: 4-Bromofluorobenzene	0.44		0.5000		87.0	70	130			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
R RPD outside accepted recovery limits  
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank  
E Value above quantitation range  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	mb-31106		SampType: MBLK		TestCode: EPA Method 8260B: TCLP Compounds					
Client ID:	PBS		Batch ID: 31106		RunNo: 41936					
Prep Date:	4/5/2017		Analysis Date: 4/6/2017		SeqNo: 1317261		Units: ppm			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
1,2-Dichloroethane (EDC)	ND	0.050								
2-Butanone	ND	20								
Carbon tetrachloride	ND	0.050								
Chlorobenzene	ND	10								
Chloroform	ND	0.60								
1,4-Dichlorobenzene	ND	0.75								
1,1-Dichloroethene	ND	0.070								
Tetrachloroethene (PCE)	ND	0.070								
Trichloroethene (TCE)	ND	0.050								
Vinyl chloride	ND	0.020								
Surr: 1,2-Dichloroethane-d4	0.54		0.5000		108	70	130			
Surr: 4-Bromofluorobenzene	0.45		0.5000		90.7	70	130			
Surr: Dibromofluoromethane	0.54		0.5000		108	70	130			
Surr: Toluene-d8	0.49		0.5000		97.9	70	130			

Sample ID	lcs-31106		SampType: LCS		TestCode: EPA Method 8260B: TCLP Compounds					
Client ID:	LCSS		Batch ID: 31106		RunNo: 41936					
Prep Date:	4/5/2017		Analysis Date: 4/6/2017		SeqNo: 1317262		Units: ppm			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.050	1.000	0	110	70	130			
Chlorobenzene	0.95	0.050	1.000	0	95.4	70	130			
1,1-Dichloroethene	1.1	0.050	1.000	0	114	72	146			
Trichloroethene (TCE)	1.0	0.050	1.000	0	100	70	130			
Surr: 1,2-Dichloroethane-d4	0.54		0.5000		109	70	130			
Surr: 4-Bromofluorobenzene	0.44		0.5000		87.0	70	130			
Surr: Dibromofluoromethane	0.51		0.5000		103	70	130			
Surr: Toluene-d8	0.49		0.5000		99.0	70	130			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
R RPD outside accepted recovery limits  
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank  
E Value above quantitation range  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	<b>mb-31121</b>		SampType:	<b>MBLK</b>		TestCode:	<b>Volatiles by 8260B/1311</b>			
Client ID:	<b>PBS</b>		Batch ID:	<b>31121</b>		RunNo:	<b>41984</b>			
Prep Date:	<b>4/6/2017</b>		Analysis Date:	<b>4/7/2017</b>		SeqNo:	<b>1318365</b>	Units:	<b>mg/L</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.50								
2-Butanone	ND	200								
Carbon Tetrachloride	ND	0.50								
Chlorobenzene	ND	100								
Chloroform	ND	6.0								
1,4-Dichlorobenzene	ND	7.5								
1,2-Dichloroethane (EDC)	ND	0.50								
1,1-Dichloroethene	ND	0.70								
Hexachlorobutadiene	ND	0.50								
Tetrachloroethene (PCE)	ND	0.70								
Trichloroethene (TCE)	ND	0.50								
Vinyl chloride	ND	0.20								
Surr: 1,2-Dichloroethane-d4	0.18		0.2000		89.1	70	130			
Surr: 4-Bromofluorobenzene	0.22		0.2000		110	70	130			
Surr: Dibromofluoromethane	0.20		0.2000		101	70	130			
Surr: Toluene-d8	0.20		0.2000		98.9	70	130			

Sample ID	<b>lcs-31121</b>		SampType:	<b>LCS</b>		TestCode:	<b>Volatiles by 8260B/1311</b>			
Client ID:	<b>LCSS</b>		Batch ID:	<b>31121</b>		RunNo:	<b>41984</b>			
Prep Date:	<b>4/6/2017</b>		Analysis Date:	<b>4/7/2017</b>		SeqNo:	<b>1318366</b>	Units:	<b>mg/L</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.42	0.10	0.4000	0	105	70	130			
Chlorobenzene	0.38	0.10	0.4000	0	95.1	70	130			
1,1-Dichloroethene	0.37	0.10	0.4000	0	91.5	67.2	131			
Trichloroethene (TCE)	0.36	0.10	0.4000	0	89.7	70	130			
Surr: 1,2-Dichloroethane-d4	0.18		0.2000		88.7	70	130			
Surr: 4-Bromofluorobenzene	0.22		0.2000		111	70	130			
Surr: Dibromofluoromethane	0.20		0.2000		98.9	70	130			
Surr: Toluene-d8	0.19		0.2000		96.3	70	130			

Sample ID	<b>1704176-001ams</b>		SampType:	<b>MS</b>		TestCode:	<b>Volatiles by 8260B/1311</b>			
Client ID:	<b>Sample Location #1</b>		Batch ID:	<b>31121</b>		RunNo:	<b>41984</b>			
Prep Date:	<b>4/6/2017</b>		Analysis Date:	<b>4/7/2017</b>		SeqNo:	<b>1318368</b>	Units:	<b>mg/L</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.10	0.4000	0.6401	103	70	130			
Chlorobenzene	0.37	0.10	0.4000	0	93.7	70	130			
1,1-Dichloroethene	0.35	0.10	0.4000	0	88.2	70	130			
Trichloroethene (TCE)	0.35	0.10	0.4000	0	88.4	70	130			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH Not In Range

RL Reporting Detection Limit

W Sample container temperature is out of limit as specified



# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	1704176-001ams	SampType:	MS	TestCode:	Volatiles by 8260B/1311					
Client ID:	Sample Location #1	Batch ID:	31121	RunNo:	41984					
Prep Date:	4/6/2017	Analysis Date:	4/7/2017	SeqNo:	1318368	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 1,2-Dichloroethane-d4	0.19		0.2000		92.9	70	130			
Surr: 4-Bromofluorobenzene	0.22		0.2000		108	70	130			
Surr: Dibromofluoromethane	0.20		0.2000		99.8	70	130			
Surr: Toluene-d8	0.18		0.2000		91.9	70	130			

Sample ID	1704176-001amsd	SampType:	MSD	TestCode: Volatiles by 8260B/1311						
Client ID:	Sample Location #1	Batch ID:	31121	RunNo: 41984						
Prep Date:	4/6/2017	Analysis Date:	4/7/2017	SeqNo: 1318369		Units: mg/L				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.0	0.10	0.4000	0.6401	99.7	70	130	1.07	20	
Chlorobenzene	0.37	0.10	0.4000	0	91.7	70	130	2.16	20	
1,1-Dichloroethene	0.35	0.10	0.4000	0	88.0	70	130	0.316	20	
Trichloroethene (TCE)	0.36	0.10	0.4000	0	90.5	70	130	2.35	20	
Surr: 1,2-Dichloroethane-d4	0.19		0.2000		95.6	70	130	0	0	
Surr: 4-Bromofluorobenzene	0.22		0.2000		112	70	130	0	0	
Surr: Dibromofluoromethane	0.20		0.2000		102	70	130	0	0	
Surr: Toluene-d8	0.19		0.2000		95.6	70	130	0	0	

Sample ID	lcs-31139		SampType: LCS		TestCode: Volatiles by 8260B/1311					
Client ID:	LCSS		Batch ID: 31139		RunNo: 42005					
Prep Date:	4/7/2017		Analysis Date: 4/10/2017		SeqNo: 1319276		Units: mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.43	0.30	0.4000	0	109	70	130			
Chlorobenzene	0.40	0.30	0.4000	0	100	70	130			
1,1-Dichloroethene	0.47	0.30	0.4000	0	116	67.2	131			
Trichloroethene (TCE)	0.43	0.30	0.4000	0	107	70	130			
Surr: 1,2-Dichloroethane-d4	0.17		0.2000		83.6	70	130			
Surr: 4-Bromofluorobenzene	0.21		0.2000		103	70	130			
Surr: Dibromofluoromethane	0.21		0.2000		104	70	130			
Surr: Toluene-d8	0.18		0.2000		92.3	70	130			

Sample ID	mb-31139		SampType:	MBLK		TestCode:	Volatiles by 8260B/1311				
Client ID:	PBS		Batch ID:	31139		RunNo:	42005				
Prep Date:	4/7/2017		Analysis Date:	4/10/2017		SeqNo:	1319277		Units:	mg/L	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Benzene	ND	0.50									
2-Butanone	ND	200									

### Qualifiers:

* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D Sample Diluted Due to Matrix	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit	P Sample pH Not In Range
R RPD outside accepted recovery limits	RL Reporting Detection Limit
S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

**Client:** Western Refining Southwest, Gallup

**Project:** Naptha Line Spill

Sample ID <b>mb-31139</b>	SampType: <b>MBLK</b>	TestCode: <b>Volatiles by 8260B/1311</b>								
Client ID: <b>PBS</b>	Batch ID: <b>31139</b>	RunNo: <b>42005</b>								
Prep Date: <b>4/7/2017</b>	Analysis Date: <b>4/10/2017</b>	SeqNo: <b>1319277</b> Units: <b>mg/L</b>								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Carbon Tetrachloride	ND	0.50								
Chlorobenzene	ND	100								
Chloroform	ND	6.0								
1,4-Dichlorobenzene	ND	7.5								
1,2-Dichloroethane (EDC)	ND	0.50								
1,1-Dichloroethene	ND	0.70								
Hexachlorobutadiene	ND	0.50								
Tetrachloroethene (PCE)	ND	0.70								
Trichloroethene (TCE)	ND	0.50								
Vinyl chloride	ND	0.20								
Surr: 1,2-Dichloroethane-d4	0.17		0.2000		85.3	70	130			
Surr: 4-Bromofluorobenzene	0.20		0.2000		101	70	130			
Surr: Dibromofluoromethane	0.21		0.2000		105	70	130			
Surr: Toluene-d8	0.18		0.2000		92.0	70	130			

Sample ID <b>1704176-004ams</b>	SampType: <b>MS</b>	TestCode: <b>Volatiles by 8260B/1311</b>								
Client ID: <b>Sample Location #4</b>	Batch ID: <b>31139</b>	RunNo: <b>42005</b>								
Prep Date: <b>4/7/2017</b>	Analysis Date: <b>4/10/2017</b>	SeqNo: <b>1319294</b> Units: <b>mg/L</b>								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.4	0.30	0.3995	0.8792	119	70	130			
Chlorobenzene	0.43	0.30	0.3995	0	109	70	130			
1,1-Dichloroethene	0.49	0.30	0.3995	0	124	70	130			
Trichloroethene (TCE)	0.47	0.30	0.3995	0	118	70	130			
Surr: 1,2-Dichloroethane-d4	0.16		0.1998		81.9	70	130			
Surr: 4-Bromofluorobenzene	0.20		0.1998		101	70	130			
Surr: Dibromofluoromethane	0.20		0.1998		101	70	130			
Surr: Toluene-d8	0.19		0.1998		94.6	70	130			

Sample ID <b>1704176-004amsd</b>	SampType: <b>MSD</b>	TestCode: <b>Volatiles by 8260B/1311</b>								
Client ID: <b>Sample Location #4</b>	Batch ID: <b>31139</b>	RunNo: <b>42005</b>								
Prep Date: <b>4/7/2017</b>	Analysis Date: <b>4/10/2017</b>	SeqNo: <b>1319295</b> Units: <b>mg/L</b>								
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.3	0.30	0.3995	0.8792	113	70	130	1.98	20	
Chlorobenzene	0.43	0.30	0.3995	0	106	70	130	2.16	20	
1,1-Dichloroethene	0.48	0.30	0.3995	0	121	70	130	1.98	20	
Trichloroethene (TCE)	0.46	0.30	0.3995	0	115	70	130	2.33	20	
Surr: 1,2-Dichloroethane-d4	0.17		0.1998		83.6	70	130	0	0	
Surr: 4-Bromofluorobenzene	0.21		0.1998		105	70	130	0	0	

### Qualifiers:

* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D Sample Diluted Due to Matrix	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit	P Sample pH Not In Range
R RPD outside accepted recovery limits	RL Reporting Detection Limit
S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID		1704176-004amsd		SampType: MSD		TestCode: Volatiles by 8260B/1311					
Client ID:		Sample Location #4		Batch ID: 31139		RunNo: 42005					
Prep Date:		4/7/2017		Analysis Date: 4/10/2017		SeqNo: 1319295		Units: mg/L			
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: Dibromofluoromethane		0.20		0.1998		101	70	130	0	0	
Surr: Toluene-d8		0.19		0.1998		94.7	70	130	0	0	

### Qualifiers:

* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D Sample Diluted Due to Matrix	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit	P Sample pH Not In Range
R RPD outside accepted recovery limits	RL Reporting Detection Limit
S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	<b>MB-31138</b>		SampType:	<b>MBLK</b>		TestCode:	<b>EPA Method 8310: PAHs</b>			
Client ID:	<b>PBS</b>		Batch ID:	<b>31138</b>		RunNo:	<b>41983</b>			
Prep Date:	<b>4/7/2017</b>		Analysis Date:	<b>4/10/2017</b>		SeqNo:	<b>1318361</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Naphthalene	ND	0.25								
1-Methylnaphthalene	ND	0.25								
2-Methylnaphthalene	ND	0.25								
Acenaphthylene	ND	0.25								
Acenaphthene	ND	0.25								
Fluorene	ND	0.030								
Phenanthrene	0.0012	0.015								J
Anthracene	ND	0.015								
Fluoranthene	ND	0.020								
Pyrene	ND	0.025								
Benz(a)anthracene	ND	0.010								
Chrysene	ND	0.010								
Benzo(b)fluoranthene	ND	0.010								
Benzo(k)fluoranthene	ND	0.010								
Benzo(a)pyrene	0.00050	0.010								J
Dibenz(a,h)anthracene	ND	0.010								
Benzo(g,h,i)perylene	0.00050	0.010								J
Indeno(1,2,3-cd)pyrene	ND	0.010								
Surr: Benzo(e)pyrene	0.29		0.5000		58.0	32.4	163			

Sample ID	<b>LCS-31138</b>		SampType:	<b>LCS</b>		TestCode:	<b>EPA Method 8310: PAHs</b>			
Client ID:	<b>LCSS</b>		Batch ID:	<b>31138</b>		RunNo:	<b>41983</b>			
Prep Date:	<b>4/7/2017</b>		Analysis Date:	<b>4/10/2017</b>		SeqNo:	<b>1318362</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Naphthalene	1.2	0.25	2.000	0	60.9	38.1	121			
1-Methylnaphthalene	1.3	0.25	2.000	0	65.7	39.8	121			
2-Methylnaphthalene	1.3	0.25	2.000	0	63.5	38.6	119			
Acenaphthylene	1.3	0.25	2.000	0	63.5	56.9	119			
Acenaphthene	1.3	0.25	2.000	0	63.3	39.1	121			
Fluorene	0.12	0.030	0.2000	0	61.3	35.8	116			
Phenanthrene	0.065	0.015	0.1006	0	64.4	34.3	126			
Anthracene	0.054	0.015	0.1006	0	54.2	31.2	117			
Fluoranthene	0.13	0.020	0.2006	0	64.6	31.2	136			
Pyrene	0.14	0.025	0.2000	0	71.8	40.8	128			
Benz(a)anthracene	0.014	0.010	0.02000	0	68.8	25.7	136			
Chrysene	0.062	0.010	0.1006	0	61.9	34.2	129			
Benzo(b)fluoranthene	0.016	0.010	0.02500	0	63.0	33.2	121			
Benzo(k)fluoranthene	0.0090	0.010	0.01250	0	72.0	35.7	130			J

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
R RPD outside accepted recovery limits  
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank  
E Value above quantitation range  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	LCS-31138		SampType:	LCS		TestCode:	EPA Method 8310: PAHs			
Client ID:	LCSS		Batch ID:	31138		RunNo:	41983			
Prep Date:	4/7/2017		Analysis Date:	4/10/2017		SeqNo:	1318362		Units: mg/Kg	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzo(a)pyrene	0.0082	0.010	0.01250	0	66.0	27	131			J
Dibenz(a,h)anthracene	0.016	0.010	0.02500	0	65.0	29.4	131			
Benzo(g,h,i)perylene	0.018	0.010	0.02500	0	73.0	32.9	130			
Indeno(1,2,3-cd)pyrene	0.028	0.010	0.05002	0	56.5	28.2	135			
Surr: Benzo(e)pyrene	0.36		0.5000		71.6	32.4	163			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH Not In Range

RL Reporting Detection Limit

W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	MB-31159		SampType:	MBLK		TestCode:	MERCURY, TCLP				
Client ID:	PBW		Batch ID:	31159		RunNo:	42003				
Prep Date:	4/10/2017		Analysis Date:	4/10/2017		SeqNo:	1319243		Units:	mg/L	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Mercurv	ND	0.020									

Sample ID	LCS-31159		SampType: LCS		TestCode: MERCURY, TCLP					
Client ID:	LCSW		Batch ID: 31159		RunNo: 42003					
Prep Date:	4/10/2017		Analysis Date: 4/10/2017		SeqNo: 1319244		Units: mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	0.0050	0.020	0.005000	0	100	80	120			J

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
R RPD outside accepted recovery limits  
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank  
E Value above quantitation range  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

Client: Western Refining Southwest, Gallup

Project: Naptha Line Spill

Sample ID	<b>MB-31140</b>		SampType:	<b>MBLK</b>		TestCode:	<b>EPA Method 6010B: TCLP Metals</b>			
Client ID:	<b>PBW</b>		Batch ID:	<b>31140</b>		RunNo:	<b>41992</b>			
Prep Date:	<b>4/7/2017</b>		Analysis Date:	<b>4/10/2017</b>		SeqNo:	<b>1318852</b>	Units:	<b>mg/L</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	ND	5.0								
Barium	ND	100								
Cadmium	ND	1.0								
Chromium	ND	5.0								
Lead	ND	5.0								
Selenium	ND	1.0								
Silver	ND	5.0								

Sample ID	<b>LCS-31140</b>		SampType:	<b>LCS</b>		TestCode:	<b>EPA Method 6010B: TCLP Metals</b>			
Client ID:	<b>LCSW</b>		Batch ID:	<b>31140</b>		RunNo:	<b>41992</b>			
Prep Date:	<b>4/7/2017</b>		Analysis Date:	<b>4/10/2017</b>		SeqNo:	<b>1318853</b>	Units:	<b>mg/L</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	0.52	5.0	0.5000	0	104	80	120			J
Barium	0.48	100	0.5000	0	97.0	80	120			J
Cadmium	0.51	1.0	0.5000	0	101	80	120			J
Chromium	0.49	5.0	0.5000	0	98.0	80	120			J
Lead	0.47	5.0	0.5000	0	94.3	80	120			J
Selenium	0.50	1.0	0.5000	0	100	80	120			J
Silver	0.10	5.0	0.1000	0	104	80	120			J

Sample ID	<b>1704176-001AMS</b>		SampType:	<b>MS</b>		TestCode:	<b>EPA Method 6010B: TCLP Metals</b>			
Client ID:	<b>Sample Location #1</b>		Batch ID:	<b>31140</b>		RunNo:	<b>41992</b>			
Prep Date:	<b>4/7/2017</b>		Analysis Date:	<b>4/10/2017</b>		SeqNo:	<b>1318856</b>	Units:	<b>mg/L</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	0.53	5.0	0.5000	0	105	75	125			J
Barium	3.5	100	0.5000	3.095	83.8	75	125			J
Cadmium	0.50	1.0	0.5000	0	100	75	125			J
Chromium	0.47	5.0	0.5000	0	93.8	75	125			J
Lead	0.45	5.0	0.5000	0	90.4	75	125			J
Selenium	0.46	1.0	0.5000	0	92.6	75	125			J
Silver	0.10	5.0	0.1000	0	102	75	125			J

Sample ID	<b>1704176-001AMSD</b>		SampType:	<b>MSD</b>		TestCode:	<b>EPA Method 6010B: TCLP Metals</b>			
Client ID:	<b>Sample Location #1</b>		Batch ID:	<b>31140</b>		RunNo:	<b>41992</b>			
Prep Date:	<b>4/7/2017</b>		Analysis Date:	<b>4/10/2017</b>		SeqNo:	<b>1318857</b>	Units:	<b>mg/L</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	0.54	5.0	0.5000	0	108	75	125	3.04	20	J

### Qualifiers:

* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D Sample Diluted Due to Matrix	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit	P Sample pH Not In Range
R RPD outside accepted recovery limits	RL Reporting Detection Limit
S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1704176

21-Apr-17

**Client:** Western Refining Southwest, Gallup

**Project:** Naptha Line Spill

Sample ID	1704176-001AMSD	SampType:	MSD	TestCode: EPA Method 6010B: TCLP Metals						
Client ID:	Sample Location #1	Batch ID:	31140	RunNo: 41992						
Prep Date:	4/7/2017	Analysis Date:	4/10/2017	SeqNo: 1318857		Units: mg/L				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Barium	3.6	100	0.5000	3.095	107	75	125	3.31	20	J
Cadmium	0.51	1.0	0.5000	0	103	75	125	2.26	20	J
Chromium	0.48	5.0	0.5000	0	95.6	75	125	1.92	20	J
Lead	0.46	5.0	0.5000	0	92.5	75	125	2.20	20	J
Selenium	0.48	1.0	0.5000	0	96.1	75	125	3.72	20	J
Silver	0.10	5.0	0.1000	0	105	75	125	3.19	20	J

Sample ID	1704176-001AMS	SampType:	MS	TestCode:	EPA Method 6010B: TCLP Metals					
Client ID:	Sample Location #1	Batch ID:	31140	RunNo:	41992					
Prep Date:	4/7/2017	Analysis Date:	4/10/2017	SeqNo:	1318866	Units:	mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	0.56	10	0.5000	0	111	75	125			J
Barium	3.7	200	0.5000	3.326	74.3	75	125			JS
Cadmium	0.52	2.0	0.5000	0	104	75	125			J
Chromium	0.49	10	0.5000	0	98.1	75	125			J
Lead	0.48	10	0.5000	0	96.8	75	125			J
Selenium	0.45	2.0	0.5000	0	90.2	75	125			J
Silver	0.10	10	0.1000	0	102	75	125			J

Sample ID	1704176-001AMSD	SampType:	MSD	TestCode: EPA Method 6010B: TCLP Metals						
Client ID:	Sample Location #1	Batch ID:	31140	RunNo: 41992						
Prep Date:	4/7/2017	Analysis Date:	4/10/2017	SeqNo: 1318867		Units: mg/L				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	0.58	10	0.5000	0	116	75	125	4.17	20	J
Barium	3.9	200	0.5000	3.326	112	75	125	4.99	20	J
Cadmium	0.54	2.0	0.5000	0	108	75	125	4.36	20	J
Chromium	0.51	10	0.5000	0	102	75	125	4.30	20	J
Lead	0.51	10	0.5000	0	101	75	125	4.49	20	J
Selenium	0.48	2.0	0.5000	0	96.6	75	125	6.86	20	J
Silver	0.11	10	0.1000	0	106	75	125	4.03	20	J

### Qualifiers:

* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D Sample Diluted Due to Matrix	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit	P Sample pH Not In Range
R RPD outside accepted recovery limits	RL Reporting Detection Limit
S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified





Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: www.hallenvironmental.com

## Sample Log-In Check List

Client Name: Western Refining Gallup

Work Order Number: 1704176

RcptNo: 1

Received By: Ashley Gallegos 4/5/2017 2:18:00 PM

Completed By: Ashley Gallegos 4/5/2017 3:05:18 PM

Reviewed By:

AS

04/05/17

AS

AS

### Chain of Custody

1. Custody seals intact on sample bottles? Yes ☐ No ☐ Not Present ☒
2. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
3. How was the sample delivered? Client

### Log In

4. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
5. Were all samples received at a temperature of  $>0^{\circ}\text{C}$  to  $6.0^{\circ}\text{C}$ ? Yes ☒ No ☐ NA ☐
6. Sample(s) in proper container(s)? Yes ☒ No ☐
7. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
8. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
9. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
10. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☒
11. Were any sample containers received broken? Yes ☐ No ☒
12. Does paperwork match bottle labels?  
(Note discrepancies on chain of custody) Yes ☒ No ☐
13. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
14. Is it clear what analyses were requested? Yes ☒ No ☐
15. Were all holding times able to be met?  
(If no, notify customer for authorization.) Yes ☒ No ☐

# of preserved  
bottles checked  
for pH: \_\_\_\_\_  
( $<2$  or  $>12$  unless noted)  
Adjusted? \_\_\_\_\_  
Checked by: \_\_\_\_\_

### Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified:

Date

By Whom:

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding:

Client Instructions:

17. Additional remarks:

### 18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	3.9	Good	Not Present			



## **ATTACHMENT B**

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number NM000033211	2. Page 1 of 1	3. Emergency Response Phone 389-444-7077	4. Manifest Tracking Number J02637254	<b>GBF</b>	
5. Generator's Name and Mailing Address Western Refining Company - Oakup Refinery 1400 East 38 Jamestown, NM 87347		Generator's Site Address (if different than mailing address) Alt. ATTN: Janella Yestal					
Generator's Phone: 805 862-1709							
6. Transporter 1 Company Name CHEMICAL TRANSPORTATION, INC.		U.S. EPA ID Number AZT050010008					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address US Ecology Texas 3277 County Road 69 Robstown, TX 78380		U.S. EPA ID Number TX0009452340					
Facility's Phone: 803 242-3208							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
			No.	Type			
	X	1. HAZARDOUS WASTE, solid, n.o.s. (Benzene, Xylene), B, PGIII	001	GM	00010	T	0018
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information PROFILE# 090101359-0, TX Waste Code OUT3301H, ERG#171							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name ALVIN Dorsey		Signature 		Month 06		Day 28	
				Year 17			
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name 		Signature 		Month 6		Day 28
				Year 17			
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator)		U.S. EPA ID Number				
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator)						Month ____	
						Day ____	
						Year ____	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name		Signature		Month ____		Day ____	
				Year ____			

042

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number NM0000333211		2. Page 1 of 1	3. Emergency Response Phone 888-44-7077		4. Manifest Tracking Number 002837255 GBF		
		5. Generator's Name and Mailing Address Western Refining Company - Oilref Refinery 1400 EBR 39 Jamestown, NM 87347 Generator's Phone: 505-242-3209		Generator's Site Address (if different than mailing address) Attn: Janella Yostel					
6. Transporter 1 Company Name CHEMICAL TRANSPORTATION, INC.		U.S. EPA ID Number AZT050010008							
7. Transporter 2 Company Name		U.S. EPA ID Number							
8. Designated Facility Name and Site Address US Ecology Texas 9377 County Road 89 Roubidoux, TX 76880 Facility's Phone: 800-242-3209		U.S. EPA ID Number TXD009452340							
GENERATOR	9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. NAB077, Hazardous waste, solid, n.o.s. (Benzene, Xylene), 9, PCB			001 CM		00018	T	0018
		2.							
		3.							
		4.							
14. Special Handling Instructions and Additional Information PROCLB# 090101359-0, TX Waste Code OUT3301H, ENG#171									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offor's Printed/Typed Name: ALVIN DORSEY Signature: [Signature] Month: 06 Day: 29 Year: 17									
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:								
	17. Transporter Acknowledgment of Receipt of Materials								
	Transporter 1 Printed/Typed Name: [Signature] Signature: [Signature] Month: 06 Day: 29 Year: 17								
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name: [Signature] Signature: [Signature] Month: Day: Year:								
	18. Discrepancy								
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
	18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number								
Facility's Phone:									
18c. Signature of Alternate Facility (or Generator) Month: Day: Year:									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1.		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name				Signature				Month: Day: Year:	



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District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

☒ Initial Report ☐ Final Report

Name of Company: Western Refining	Contact: Cheryl Johnson	
Address: I-40 Exit 39, Jamestown, NM 87347	Telephone No: 505 722 0231	
Facility Name: Gallup Refinery	Facility Type: Petroleum Refinery	
Surface Owner	Mineral Owner	API No.

**LOCATION OF RELEASE**

Unit Letter	Section 28	Township 15N	Range 15W	Feet from the	North/South Line	Feet from the	East/West Line	County McKinley
-------------	---------------	-----------------	--------------	---------------	------------------	---------------	----------------	--------------------

Latitude 35°29'28.56"N Longitude 108°25'24.24"W NAD83

**NATURE OF RELEASE**


Type of Release: Gasoline spill (89 Octane)	Volume of Release: Estimated at 8900 gallons of gasoline	Volume Recovered: 89,000 gallons of gasoline recovered via vacuum truck.
Source of Release: Valve left open to sewer	Date and Hour of Occurrence: 05/07/17 @ 0800 hours	Date and Hour of Discovery: 05/07/17 @ 0800 hours
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? C Chavez/OCD; K VanHorn/NMED-HWB; B Powell/OCD; C Smith/NMED	
By Whom? Cheryl Johnson	Date and Hour: 05/07/17 @ 1145 hrs	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse:	
If a Watercourse was Impacted, Describe Fully.* N/A		

Describe Cause of Problem and Remedial Action Taken.\* At 0800 hours, operator noticed gasoline pooling underneath the pipe rack located on the west side of the rail car loading area. Operator observed that gasoline had pooled in and around the pipe rack area and was flowing into the sewer box located near the railcar loading area. Offsites supervisor, Kurtz and Environmental were immediately notified. Maintenance was also contacted to begin vacuuming out sewer box. When level in sewer box was lowered it was observed that a ¾" valve going into a sewer cup was draining (valve was in the open position). Valve(s) were immediately closed at the gasoline additive tank. The sewer cup overflowed onto a concrete pad underneath the pipe rack and into a sewer drain. Temperature 45°F, calm, partly cloudy. No personnel injuries were reported and no fires occurred from this incident.

Describe Area Affected and Cleanup Action Taken.\* The overflow was contained inside a concrete berm underneath the pipe rack which then flowed in a south, south-easterly direction towards a sewer drain (Figure I. #2). The overflow was pumped out using a vacuum truck and approximately three loads was collected from this area as well as from the sump box located on the north side of the pipe rack (Figure I. #3). A sample of the product was collected and analyzed in our Gallup Facility Laboratory to verify product. An estimated 8900 gallons of gasoline was picked up via vacuum truck and placed back into the process at the slop tank. Clean-up activities were not immediately initiated as the majority of the spill was contained inside a concrete pad.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

**OIL CONSERVATION DIVISION**

Signature: 	Approved by Environmental Specialist:	
Printed Name: Cheryl Johnson	Approval Date:	Expiration Date:
Title: Environmental Specialist	Conditions of Approval:	
E-mail Address: Cheryl.A.johnson@Andeavor.com	Attached <input type="checkbox"/>	
Date: 8/30/2017	Phone: 505-722-0231	

\* Attach Additional Sheets If Necessary

FIGURE 1





## Chavez, Carl J, EMNRD

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**From:** Johnson, Cheryl A <Cheryl.A.Johnson@andeavor.com>  
**Sent:** Thursday, August 3, 2017 9:51 AM  
**To:** Chavez, Carl J, EMNRD; VanHorn, Kristen, NMENV  
**Cc:** Powell, Brandon, EMNRD; Hains, Allen; 'Bailey, William'  
**Subject:** Release Notification (C-141) - Gallup Refinery  
**Attachments:** LTR, C-141 SIGNED.Pdf

Carl, Kristen:

Attached is form C-141 initial report for the T-35 overflow which occurred on Sunday, July 30, 2017. If you have any questions, please contact me or Bill Bailey, Environmental Supervisor.

Thank you, cj

Cheryl Johnson  
Environmental Specialist

*As part of Tesoro and Western Refining's transition to Andeavor on August 1, please be aware that my e-mail address will change to [Cheryl.A.Johnson@andeavor.com](mailto:Cheryl.A.Johnson@andeavor.com) beginning on Monday, July 31, 2017. Note that I will continue to receive e-mails sent to [cheryl.johnson@western.com](mailto:cheryl.johnson@western.com) for a period of time to ensure that I do not miss any messages from you.*

**Andeavor** - Gallup Refinery  
92 Giant Crossing Road  
Gallup, NM 87301  
505 722 0231 Direct  
505 863-0930 Fax  
505 722 3833 Main

**[Cheryl.A.Johnson@andeavor.com](mailto:Cheryl.A.Johnson@andeavor.com) – Effective July 31, 2017**  
[cheryl.johnson@wnr.com](mailto:cheryl.johnson@wnr.com)



August 3, 2017

Mr. Carl Chavez, CHMM  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**Re: Release Notification and Corrective Action Form C-141 for Tank 35 overflow – Western - Gallup Refinery, McKinley County, New Mexico.**

Dear Mr. Chavez:

Enclosed is form C-141 prepared by Western for the Tank 35 overflow to ground surface which occurred on July 30, 2017 at the Gallup Refinery, I-40 Exit 39, Jamestown, NM (McKinley County). This report has also been submitted electronically (via e-mail) to all parties listed below.

If you have any questions, please do not hesitate to contact me or Mr. Bill Bailey – Environmental Supervisor at (505) 726-9743.

Sincerely,



Cheryl Johnson  
Environmental Specialist  
Attachment

cc: Brandon Powell, NM-OCD-Aztec  
Kristen VanHorn, NM-HWB  
Bill Bailey, WNR - GLP  
Allen Haines, WNR-El Paso

District I  
1625 N. French Dr., Hobbs, NM 88240  
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1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

### Release Notification and Corrective Action

#### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: Western Refining	Contact: Cheryl Johnson
Address: I-40 Exit 39, Jamestown, NM 87347	Telephone No: 505 722 0231
Facility Name: Gallup Refinery	Facility Type: Petroleum Refinery

Surface Owner	Mineral Owner	API No.
---------------	---------------	---------

#### LOCATION OF RELEASE

Unit Letter	Section 28	Township 15N	Range 15W	Feet from the	North/South Line	Feet from the	East/West Line	County McKinley
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Latitude 35°29'.84"N Longitude 108°25'56.17"W NAD83

#### NATURE OF RELEASE

Type of Release: Oily Water Mixture w/hydrocarbons(Waste water)	Volume of Release: Estimated at 542 bbls of oily/water mixture	Volume Recovered: To date 18,000 gallons of oily/water mix recovered via vacuum truck – on going.
Source of Release: Tank 35	Date and Hour of Occurrence: 7/30/17 @ 0130 hours	Date and Hour of Discovery: 7/30/17 @ 0130 hours
Was Immediate Notice Given? <div><input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No    <input type="checkbox"/> Not Required</div>	If YES, To Whom? C Chavez/OCD; K VanHorn/NMED-HWB; B Powell/OCD; C Smith/NMED	
By Whom? Alvin Dorsey	Date and Hour: 7/30/17 @ 0435 hrs	
Was a Watercourse Reached? <div><input type="checkbox"/> Yes    <input checked="" type="checkbox"/> No</div>	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.* N/A		

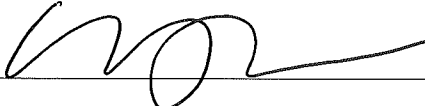
#### Describe Cause of Problem and Remedial Action Taken.\*

Facility received heavy rains on 7/29/17 through 7/30/17 and also had a fire water line leak in the process area (Amine Unit). Running max flow of 260GPM, the Waste Water Treatment Plant was not able to keep up with the volume of water going to Tank 35 from the rainstorm and the fire water leak. Operator had switched rundown tanks to try to keep up with the influx of water filling up all the storage tanks (Tank 27, Tank 28 and Tank 35). At approximately 0130 hours Tank 35 overflowed through the vents at the top of the tank and flowed onto the ground surface pooling inside an earthen berm; the overflow stopped at 0245 hours. Operator closed the rundown line to Tank 35 to slow down the flow so the WWTP could process the excess flow and lower the level on Tank 35. On-site Kurtz Fire Department was notified and responded by applying a foam layer on the spill site to minimize vapor and fire hazards. Wind direction north at about 8 mph with a temperature of 70 degrees. No personnel injuries were reported and no fires occurred.

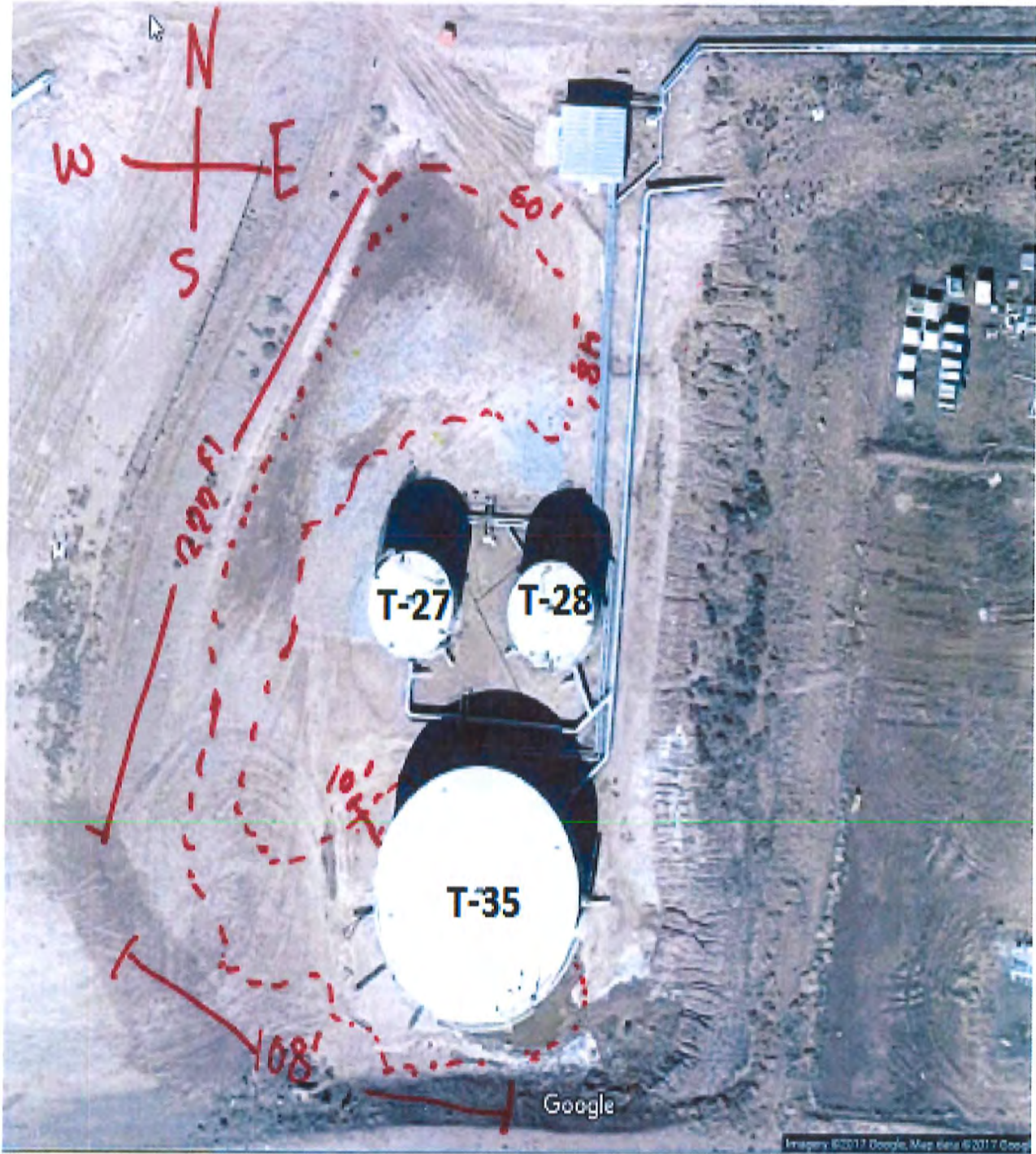
#### Describe Area Affected and Cleanup Action Taken.\*

The overflow was contained inside an earthen berm (227ft x 60ft) with major pooling on the north section of the berm (see Attachment 1). A thin oily layer with a sheen was observed on the surface of the water. Clean up activities were not immediately initiated due to severe weather (lightning) and muddy conditions on 7/30/17 and 7/31/17. Clean up activities began on 8/1/17 with vacuuming of the oily/water mixture from within the berm. To date 8/3/17, an estimated 18,000 gals of oily/water mix has been vacuumed up from the area. Clean up operations continue.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Cheryl Johnson		Approved by Environmental Specialist:	
Title: Environmental Specialist		Approval Date:	Expiration Date:
E-mail Address: Cheryl.a.johnson@wnr.com		Conditions of Approval:	
Date:		Attached <input type="checkbox"/>	
Phone:			

ATTACHMENT 1



## Chavez, Carl J, EMNRD

---

**From:** Vestal, Janelle <Janelle.Vestal@wnr.com>  
**Sent:** Thursday, April 27, 2017 5:51 PM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** VanHorn, Kristen, NMENV; Bailey, William; Pruner, Dave  
**Subject:** RE: Release Notification Sodium Hydroxide  
**Attachments:** 170427 C-141initial.pdf; Caustic spill.JPG; SDS CAUSTIC\_SODA\_25\_30.pdf

Good Afternoon Carl,

Attached please find our initial C-141 Report for the Sodium Hydroxide leak/spill we had at Western Refining – Gallup on 4/20/2017. Also attached is a picture of the location and extent of the spill, and the SDS for the Sodium Hydroxide we have on site.

Thank you for your attention to this matter,

### Janelle Vestal

Environmental Engineer

Western Refining Southwest Inc.  
Gallup Refinery  
505-726-9721  
Cell 505-285-8193  
[janelle.vestal@wnr.com](mailto:janelle.vestal@wnr.com)

---

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Friday, April 21, 2017 12:47 PM  
**To:** Vestal, Janelle <Janelle.Vestal@wnr.com>  
**Cc:** VanHorn, Kristen, NMENV <Kristen.VanHorn@state.nm.us>  
**Subject:** Release Notification Sodium Hydroxide

This email was sent by an external sender. Please use caution when opening attachments, clicking web links, or replying until you have verified this email sender.

---

Janelle:

My contact info. Thank you.

Mr. Carl J. Chavez, CHMM (#13099)  
New Mexico Oil Conservation Division  
Energy Minerals and Natural Resources Department  
1220 South St Francis Drive  
Santa Fe, New Mexico 87505  
Ph. (505) 476-3490  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)



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State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

### Release Notification and Corrective Action

#### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Western Refining	Contact	William Bailey
Address	92 Giant Crossing Road, Gallup, NM 87301	Telephone No.	505-726-9743
Facility Name	Western Refining, Gallup Refinery	Facility Type	Petroleum Refinery

Surface Owner	Mineral Owner	API No.
---------------	---------------	---------

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	28	15N	15W					McKinley

Latitude 35° 29' 26" Longitude 108° 25' 45" NAD83

#### NATURE OF RELEASE

Type of Release	Sodium Hydroxide Leak	Volume of Release	80 bbls	Volume Recovered	30 gal
Source of Release	API Caustic Pump Hose from Flare KOD Tank	Date and Hour of Occurrence	04/20/2017 2100 hrs	Date and Hour of Discovery	04/20/2017 2130 hrs
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NRC/ NM OCD (C. Chavez) / NMED HWB (K. VanHorn - msg)			
By Whom?	Janelle Vestal	Date and Hour 04/21/2014 1150 hrs / 1230 hrs / 1247 hrs			
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.\*

N/A

Describe Cause of Problem and Remedial Action Taken.\*

At 2130 hr on 4/20/2017, during regular rounds, operator noticed the hose to the sandpiper pump had ruptured. Caustic (20-30% sodium hydroxide - SDS attached) was spraying out of the hole. Previous round of the area at approximately 1900 hr on 4/20/2017 had shown no problem with this pump hose. The operator who found the leak donned the proper PPE, turned off the sandpiper, and blocked it in. The shift foreman, refinery manager, and Environmental Department were notified of the incident. Maintenance pumped approximately 20-30 gallons of caustic into a vacuum truck. Initial estimates of the leak were less than 4 bbls. Maintenance also sprayed water on surrounding equipment in an attempt to clean off the caustic. Pumping of the caustic was switched to the east caustic pump. The area was taped off with barricade tape to limit access. After further investigation the following morning, it was apparent that the leak was larger than first thought.

Based on the initial mass balance calculations on the KOD tank where the caustic came from, estimates of the leak volume are approximately 80 bbls.

Describe Area Affected and Cleanup Action Taken.\*

The caustic and cleaning water was somewhat confined to the caustic pump containment. A volume spilled over a retaining wall to a bermed area North of the pump and KOD tank. A volume also sprayed surrounding equipment and out of the containments to surrounding ground. A cleanup action plan will be established.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>William Bailey</i>		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: William Bailey		Approved by Environmental Specialist:	
Title: Environmental Supervisor	Approval Date:	Expiration Date:	
E-mail Address: William.Bailey@wnr.com	Conditions of Approval:	Attached <input type="checkbox"/>	
Date: 04/27/2014	Phone: 505-726-9743		

\* Attach Additional Sheets If Necessary



Extent of spill

Pipe KOD

API Sandpiper Pump

# Material Safety Data Sheet

## Sodium Hydroxide 20-30%

ACC# 88810

### Section 1 - Chemical Product and Company Identification

**MSDS Name:** Sodium Hydroxide 20-30%

**Catalog Numbers:** M-090, M090, MCC-030345, NC9168938, NC9453737, NC9648407, NC9848909, NC9872309, XXCMS0204L, XXNAOH20%200LI, XXSODHY6N20L

**Synonyms:** Caustic Soda; Soda Lye; Sodium Hydrate.

**Company Identification:**

Fisher Scientific  
1 Reagent Lane  
Fair Lawn, NJ 07410

**For information, call:** 201-796-7100

**Emergency Number:** 201-796-7100

**For CHEMTREC assistance, call:** 800-424-9300

**For International CHEMTREC assistance, call:** 703-527-3887

### Section 2 - Composition, Information on Ingredients

CAS#	Chemical Name	Percent	EINECS/ELINCS
7732-18-5	Water	70-80	231-791-2
1310-73-2	Sodium hydroxide	20-30	215-185-5

### Section 3 - Hazards Identification

#### EMERGENCY OVERVIEW

**Appearance:** Clear liquid.

**Danger!** Corrosive. Causes eye and skin burns. May cause severe respiratory tract irritation with possible burns. May cause severe digestive tract irritation with possible burns.

**Target Organs:** Eyes, skin, mucous membranes.

#### Potential Health Effects

**Eye:** Causes eye burns. May cause chemical conjunctivitis and corneal damage.

**Skin:** Causes skin burns. May cause deep, penetrating ulcers of the skin. May cause skin rash (in milder cases), and cold and clammy skin with cyanosis or pale color.

**Ingestion:** May cause severe and permanent damage to the digestive tract. Causes gastrointestinal tract burns. May cause perforation of the digestive tract. Causes severe pain, nausea, vomiting, diarrhea, and shock. May cause systemic effects.

**Inhalation:** Irritation may lead to chemical pneumonitis and pulmonary edema. Causes severe irritation of upper respiratory tract with coughing, burns, breathing difficulty, and possible coma. Causes chemical burns to the respiratory tract. Aspiration may lead to pulmonary edema. May cause systemic effects.

**Chronic:** Prolonged or repeated skin contact may cause dermatitis. Effects may be delayed.

### Section 4 - First Aid Measures

**Eyes:** In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Get medical aid immediately.

**Skin:** In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get medical aid immediately. Wash clothing before reuse.

**Ingestion:** If swallowed, do NOT induce vomiting. Get medical aid immediately. If victim is fully conscious, give a cupful of water. Never give anything by mouth to an unconscious person.

**Inhalation:** If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical aid.

**Notes to Physician:** Treat symptomatically and supportively.

## Section 5 - Fire Fighting Measures

**General Information:** As in any fire, wear a self-contained breathing apparatus in pressure-demand, MSHA/NIOSH (approved or equivalent), and full protective gear. During a fire, irritating and highly toxic gases may be generated by thermal decomposition or combustion. Use water spray to keep fire-exposed containers cool. Use water with caution and in flooding amounts. Vapors may be heavier than air. They can spread along the ground and collect in low or confined areas. Contact with metals may evolve flammable hydrogen gas. Containers may explode when heated. Non-combustible, substance itself does not burn but may decompose upon heating to produce irritating, corrosive and/or toxic fumes.

**Extinguishing Media:** Do NOT get water inside containers. For small fires, use dry chemical, carbon dioxide, or water spray. For large fires, use dry chemical, carbon dioxide, alcohol-resistant foam, or water spray. Cool containers with flooding quantities of water until well after fire is out.

**Flash Point:** Not applicable.

**Autoignition Temperature:** Not applicable.

**Explosion Limits, Lower:** Not available.

**Upper:** Not available.

**NFPA Rating:** (estimated) Health: 3; Flammability: 0; Instability: 1

## Section 6 - Accidental Release Measures

**General Information:** Use proper personal protective equipment as indicated in Section 8.

**Spills/Leaks:** Absorb spill with inert material (e.g. vermiculite, sand or earth), then place in suitable container. Avoid runoff into storm sewers and ditches which lead to waterways. Clean up spills immediately, observing precautions in the Protective Equipment section. Provide ventilation.

## Section 7 - Handling and Storage

**Handling:** Wash thoroughly after handling. Use only in a well-ventilated area. Do not breathe dust, vapor, mist, or gas. Do not get in eyes, on skin, or on clothing. Keep container tightly closed. Do not ingest or inhale. Discard contaminated shoes.

**Storage:** Keep container closed when not in use. Store in a cool, dry, well-ventilated area away from incompatible substances. Keep away from strong acids. Keep away from metals. Keep away from flammable liquids. Keep away from organic halogens.

## Section 8 - Exposure Controls, Personal Protection

**Engineering Controls:** Facilities storing or utilizing this material should be equipped with an eyewash facility and a safety shower. Use adequate general or local exhaust ventilation to keep airborne concentrations below the permissible exposure limits.

### Exposure Limits

Chemical Name	ACGIH	NIOSH	OSHA - Final PELs
Water	none listed	none listed	none listed
Sodium hydroxide	2 mg/m3 Ceiling	10 mg/m3 IDLH	2 mg/m3 TWA

**OSHA Vacated PELs:** Water: No OSHA Vacated PELs are listed for this chemical. Sodium hydroxide: No OSHA



Vacated PELs are listed for this chemical.

### Personal Protective Equipment

**Eyes:** Wear chemical splash goggles and face shield.

**Skin:** Wear appropriate protective gloves to prevent skin exposure.

**Clothing:** Wear appropriate protective clothing to prevent skin exposure.

**Respirators:** A respiratory protection program that meets OSHA's 29 CFR 1910.134 and ANSI Z88.2 requirements or European Standard EN 149 must be followed whenever workplace conditions warrant respirator use.

## Section 9 - Physical and Chemical Properties

**Physical State:** Liquid

**Appearance:** Clear

**Odor:** none reported

**pH:** Alkaline

**Vapor Pressure:** 14 mm Hg

**Vapor Density:** >1.0

**Evaporation Rate:** Not available.

**Viscosity:** >1 (ether=1)

**Boiling Point:** 212 deg F

**Freezing/Melting Point:** 32 deg F

**Decomposition Temperature:** Not available.

**Solubility:** Completely soluble in water.

**Specific Gravity/Density:** 1.0

**Molecular Formula:** NaOH

**Molecular Weight:** Not available.

## Section 10 - Stability and Reactivity

**Chemical Stability:** Stable at room temperature in closed containers under normal storage and handling conditions.

**Conditions to Avoid:** Extreme temperatures.

**Incompatibilities with Other Materials:** Metals, acids, flammable liquids, halogenated organics (e.g. dibromoethane, hexachlorobenzene, methyl chloride, trichloroethylene), aluminum, tin, zinc, nitromethane, nitro compounds.

**Hazardous Decomposition Products:** Toxic fumes of sodium oxide.

**Hazardous Polymerization:** Has not been reported.

## Section 11 - Toxicological Information

**RTECS#:**

**CAS#** 7732-18-5: ZC0110000

**CAS#** 1310-73-2: WB4900000

**LD50/LC50:**

**CAS#** 7732-18-5:

Oral, rat: LD50 = >90 mL/kg;

**CAS#** 1310-73-2:

Draize test, rabbit, eye: 400 ug Mild;

Draize test, rabbit, eye: 1% Severe;

Draize test, rabbit, eye: 50 ug/24H Severe;

Draize test, rabbit, eye: 1 mg/24H Severe;

Draize test, rabbit, skin: 500 mg/24H Severe;

**Carcinogenicity:**

CAS# 7732-18-5: Not listed by ACGIH, IARC, NTP, or CA Prop 65.

CAS# 1310-73-2: Not listed by ACGIH, IARC, NTP, or CA Prop 65.

**Epidemiology:** No information found

**Teratogenicity:** No information found

**Reproductive Effects:** No information found

**Mutagenicity:** No information found

**Neurotoxicity:** No information found

**Other Studies:**

## Section 12 - Ecological Information

No information available.

## Section 13 - Disposal Considerations

Chemical waste generators must determine whether a discarded chemical is classified as a hazardous waste. US EPA guidelines for the classification determination are listed in 40 CFR Parts 261.3. Additionally, waste generators must consult state and local hazardous waste regulations to ensure complete and accurate classification.

**RCRA P-Series:** None listed.

**RCRA U-Series:** None listed.

## Section 14 - Transport Information

	US DOT	Canada TDG
<b>Shipping Name:</b>	SODIUM HYDROXIDE SOLUTION	No information available.
<b>Hazard Class:</b>	8	
<b>UN Number:</b>	UN1824	
<b>Packing Group:</b>	II	

## Section 15 - Regulatory Information

### US FEDERAL

#### TSCA

CAS# 7732-18-5 is listed on the TSCA inventory.

CAS# 1310-73-2 is listed on the TSCA inventory.

#### Health & Safety Reporting List

None of the chemicals are on the Health & Safety Reporting List.

#### Chemical Test Rules

None of the chemicals in this product are under a Chemical Test Rule.

#### Section 12b

None of the chemicals are listed under TSCA Section 12b.

#### TSCA Significant New Use Rule

None of the chemicals in this material have a SNUR under TSCA.

#### CERCLA Hazardous Substances and corresponding RQs

CAS# 1310-73-2: 1000 lb final RQ; 454 kg final RQ

#### SARA Section 302 Extremely Hazardous Substances

None of the chemicals in this product have a TPQ.

#### SARA Codes

CAS # 1310-73-2: immediate, reactive.

**Section 313** No chemicals are reportable under Section 313.

#### Clean Air Act:

This material does not contain any hazardous air pollutants.

This material does not contain any Class 1 Ozone depleters.

This material does not contain any Class 2 Ozone depleters.

**Clean Water Act:**

CAS# 1310-73-2 is listed as a Hazardous Substance under the CWA.

None of the chemicals in this product are listed as Priority Pollutants under the CWA.

None of the chemicals in this product are listed as Toxic Pollutants under the CWA.

**OSHA:**

None of the chemicals in this product are considered highly hazardous by OSHA.

**STATE**

CAS# 7732-18-5 is not present on state lists from CA, PA, MN, MA, FL, or NJ.

CAS# 1310-73-2 can be found on the following state right to know lists: California, New Jersey, Pennsylvania, Minnesota, Massachusetts.

**California Prop 65**

California No Significant Risk Level: None of the chemicals in this product are listed.

**European/International Regulations**

**European Labeling in Accordance with EC Directives**

**Hazard Symbols:**

C

**Risk Phrases:**

R 35 Causes severe burns.

**Safety Phrases:**

S 26 In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.

S 37/39 Wear suitable gloves and eye/face protection.

S 45 In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

**WGK (Water Danger/Protection)**

CAS# 7732-18-5: No information available.

CAS# 1310-73-2: 1

**Canada - DSL/NDL**

CAS# 7732-18-5 is listed on Canada's DSL List.

CAS# 1310-73-2 is listed on Canada's DSL List.

**Canada - WHMIS**

This product has a WHMIS classification of E.

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all of the information required by those regulations.

**Canadian Ingredient Disclosure List**

CAS# 1310-73-2 is listed on the Canadian Ingredient Disclosure List.

**Section 16 - Additional Information**

**MSDS Creation Date:** 12/12/1997

**Revision #6 Date:** 10/05/2004

*The information above is believed to be accurate and represents the best information currently available to us. However, we make no warranty of merchantability or any other warranty, express or implied, with respect to such information, and we assume no liability resulting from its use. Users should make their own investigations to determine the suitability of the information for their particular purposes. In no event shall Fisher be liable for any claims, losses, or damages of any third party or for lost profits or any special, indirect, incidental, consequential or exemplary damages, howsoever arising, even if Fisher has been advised of the possibility of such damages.*

## Chavez, Carl J, EMNRD

---

**From:** VanHorn, Kristen, NMENV  
**Sent:** Thursday, June 1, 2017 8:52 AM  
**To:** Bailey, William  
**Cc:** Hains, Allen (Allen.Hains@wnr.com); Chavez, Carl J, EMNRD; 'king.laurie@epa.gov'  
**Subject:** Response Action Report ASO Caustic Release and FCC Feed Release  
**Attachments:** Approval\_RAR\_Tank714\_June2017.pdf; Disapproval\_RAR\_ASOCausticRelease.pdf

Please see the attached correspondence.

If you have any questions, please contact me.

Thank you,  
Kristen

**Kristen Van Horn**  
NMED Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1  
Santa Fe, NM 87505  
Phone: 505-476-6046  
Email: *Kristen.VanHorn@state.nm.us*



**State of New Mexico  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**

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SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor



BUTCH TONGATE  
Cabinet Secretary

J. C. BORREGO  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

June 1, 2017

Mr. William Bailey  
Environmental Supervisor  
Western Refining Southwest Inc., Gallup Refinery  
92 Giant Crossing Road  
Gallup, New Mexico 87301

**RE: APPROVAL  
RESPONSE ACTION REPORT  
TANK T-714 – FCC FEED RELEASE FEBRUARY 5, 2016  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
WRG-17-001**

Dear Mr. Bailey:

The New Mexico Environment Department (NMED) is in receipt of Western Refining Southwest, Inc. Gallup Refinery's (Western) submittal *Response Action Report Tank T-714 – FCC Feed Release February 5, 2016* (Report) dated January 2017. The Permittee reported the release on February 7, 2016. The spill occurred within the berm around the Hot Oil/Asphalt Tank Farm (listed as AOC 18, in the pending Consent Order).

**Comment 1**

Three soil removal actions were conducted between February 2016 and August 2016, which resulted in the removal of approximately 1,600 tons of soil to approximately 36 inches below the ground surface. In Section 2.1.1 (Initial Remediation) the Permittee states, "[c]ontract personnel were called out to vacuum the liquids until further assessment could be determined. After an assessment of the spilled area, a contract company determined that in-situ solidification of the spilled area would be necessary using non-contaminated dirt. A contract company arrived on Monday, February 8th, and began the solidification process. The in-situ solidification process was not successful because the spilled material would not solidify in-situ but would move to

other areas.” If the material was not adhering to the soil, it is unlikely the FCC feedstock permeated three feet into a silty clay within the bermed tank area. This is an indication that historical releases have impacted the Hot Oil/Asphalt Tank Farm. The Permittee removed soils around Tank 714; however, other historical releases likely still affect the area. This issue may be addressed through the investigation of AOC 18 in the pending Consent Order.

**Comment 2**

It does not appear that the Permittee collected sidewall samples from the final excavation. The excavation was filled with gravel prior to final confirmation sampling. In the future, when soil cleanup activities involve excavations deeper than one foot below the ground surface, the Permittee must collect excavation sidewall samples. Soils affected by releases may remain since the horizontal extent of contamination was not confirmed.

**Comment 4**

In Section 4 (Conclusions and Recommendations) the Permittee discusses arsenic and cyanide above the DAF 20 levels. Otherwise, the Permittee achieved Residential and Construction Worker Soil Screening Limits and achieved total petroleum hydrocarbon (TPH) levels below 1000 mg/kg regarding the vertical extent of contamination. NMED agrees that the arsenic concentration is potentially naturally occurring.

**Comment 5**

Appendix D (Field Methods) is written like a work plan in future tense rather than as a report documenting field activities and describing field methods used. The information describing field methods must describe what actually occurred in the field. The information provided in Appendix D is not useful. Section 2.2.1 (Soil Sampling) states “[a] copy of the field methods used to collect the soil samples is included as Appendix D.” In the future, either describe the actual field activities conducted in soil sampling discussion or revise the information in Appendix D to reflect the soil sampling that was conducted.

**Comment 6**

The photographs presented in Appendix E are not labeled. In the future, if photographs are provided, provide descriptions of what is depicted and the cardinal directions where the photographs were taken.

Mr. Bailey  
Gallup Refinery  
June 1, 2017  
Page 3

If you have questions regarding this letter, please contact Kristen Van Horn at 505-476-4046.

Sincerely,

A handwritten signature in blue ink, appearing to read "John E. Kieling". The signature is stylized with a large initial "J" and a long horizontal stroke.

John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: K. Van Horn, NMED HWB  
C. Chavez, EMNRD OCD  
A. Hains, WRG  
L. King, EPA

File: Reading File 2017 and WRG-17-001

## Chavez, Carl J, EMNRD

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**From:** VanHorn, Kristen, NMENV  
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**To:** Bailey, William  
**Cc:** Hains, Allen (Allen.Hains@wnr.com); Chavez, Carl J, EMNRD; 'king.laurie@epa.gov'  
**Subject:** Response Action Report ASO Caustic Release and FCC Feed Release  
**Attachments:** Approval\_RAR\_Tank714\_June2017.pdf; Disapproval\_RAR\_ASOCausticRelease.pdf

Please see the attached correspondence.

If you have any questions, please contact me.

Thank you,  
Kristen

**Kristen Van Horn**  
NMED Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1  
Santa Fe, NM 87505  
Phone: 505-476-6046  
Email: *Kristen.VanHorn@state.nm.us*





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BUTCH TONGATE  
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Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

June 1, 2017

Mr. William Bailey  
Environmental Supervisor  
Western Refining Southwest Inc., Gallup Refinery  
92 Giant Crossing Road  
Gallup, New Mexico 87301

**RE: DISAPPROVAL  
RESPONSE ACTION REPORT  
BAKER TANK – ASO CAUSTIC RELEASE APRIL 3, 2016  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
WRG-17-002**

Dear Mr. Bailey:

The New Mexico Environment Department (NMED) is in receipt of Western Refining Southwest, Inc. Gallup Refinery's (Western) submittal *Response Action Report Baker Tank – ASO Caustic Release April 3, 2016* (Report), dated January 2017. NMED hereby issues this Disapproval with the following comments.

The Permittee reported the release on April 4, 2016 reporting that approximately 3 barrels (126 gallons) of spent caustic and acid soluble oil (ASO) overflowed from a Baker Tank onto the ground in the Portable Tank Storage Area just south of the Hot Oil/Asphalt Tank Farm (AOC 18, listed on the pending Consent Order).

**Comment 1**

For NMED to understand the use of the Portable Tank Storage Area, the Permittee must provide additional information regarding the area and the materials that are stored in the tanks:

- a) In Section 1.2 (Discussion of the Release) the Permittee states, “[a]t 11:45 AM on April 3, 2016 a load of caustic material from the API knock out drum was off loaded into a Baker Tank that was storing ASO. A chemical reaction occurred due to the mixing of incompatible wastes. The Baker Tank overflowed causing approximately four barrels of the material to be spilled onto the ground. The spilled material flowed south to the East Gate Road and then westward along the road. A C-141 was not initiated for this release since the total volume was less than five barrels. Four personal H2S monitors were activated during the incident. The personnel left the area immediately. The area was immediately blocked off to traffic. The refinery fire department began monitoring the area with LEL/H2S monitors. Using supplied air, the spill response personnel vacuumed the spill material from the ground and from within the Baker Tank secondary containment. The environmental department was notified of the incident.” Describe whether tanks holding incompatible wastes are stored next to each other or are separated; provide the separation distance. Describe how the tanks are labeled so that that operators can differentiate between the tank contents. In addition, provide the pH ranges for the ASO and spent caustic.
- b) The Permittee does not specify whether the tanks in the Portable Tank Storage Area are used for materials that are being stored for use or for materials that are stored for disposal, the Permittee states in Section 1.4 (Discussion of Portable Tank Storage Area) that the tanks are used to store “oily water”. It does not seem that ASO or spent caustic can be categorized as “oily water”. NMED requested additional information by email on March 10, 2017 stating “Is the portable tank storage area used for storing materials that are going to be used or for materials that are going to be shipped off? Was the ASO in the baker tank used?” Western replied in an email dated March 14, 2017, “[t]he tanks normally store materials that are going to be shipped off. When ASO is produced, it is put into the baker tank, oil is removed and recycled onsite and the ASO is shipped off.” NMED requires further information, including a material safety data sheet (MSDS) for the caustic that was mixed with the ASO, a description of the ASO, and if the Baker Tanks hold materials that are discarded.

**Comment 2**

In Section 1.4 (Discussion of the Portable Tank Storage Area) the Permittee states, “[t]he tanks are constructed of carbon steel and have a v-bottom or round bottom. The interiors of the tanks are coated with a chemical resistant coating. Fluids are transported to and from the tanks using vacuum trucks.” The Permittee does not discuss secondary containment; however, photos included in the Report demonstrate that there are what appear to be flexible containment around the Baker Tanks in the Portable Storage Tank Area. Because the Permittee uses vacuum trucks to transfer liquids to and from the tanks, there is a high risk for small releases over time in the area. Appropriate secondary containment should be installed if the Permittee continues to use the area

for storage, so that spills and releases can be contained and kept from contacting the ground surface. In addition, if the material in the tanks is stored for disposal, the tanks are subject to RCRA Subpart J and must meet all requirements for construction and operation.

**Comment 3**

Appendix D (Field Methods) is written like a work plan in future tense. The information describing field methods must include what has been conducted in the field. The information provided in Appendix D is not useful. Section 2.2.1 (Soil Sampling) states “[a] copy of the field methods used to collect the soil samples is included as Appendix D.” Either include descriptions of the actual field procedures performed in the field in Section 2.2.1 or revise Appendix D to reflect the soil sampling that was conducted.

**Comment 4**

The photographs presented in Appendix E are not labeled. Provide descriptions of what is depicted in the photographs and the cardinal directions the photographs are taken from (or an additional figure depicting the direction of the photographs).

**Comment 5**

The photographs in Appendix E show that the Baker Tanks are labeled “FLOAT” “K.O.D.” “KCC CAUSTIC” “ASO”. Provide a description of what materials are held in the tanks. For example, provide information regarding the source of “Float”. See also Comment 1b.

**Comment 6**

NMED does not consider this area to be an AOC or a SWMU at this time. However, the Permittee must take measures to ensure that this storage area is properly contained and that small spills and releases are not occurring during the transfer of materials to and from the tanks. See also Comment 2.

The Permittee must address the comments above and provide additional information regarding the release in a revised Report. The revised Report must be submitted to NMED no later than **July 31, 2017**.

Mr. Bailey  
Gallup Refinery  
June 1, 2017  
Page 4

If you have questions regarding this letter, please contact Kristen Van Horn at 505-476-4046.

Sincerely,



John E. Kielling  
Chief  
Hazardous Waste Bureau

cc: K. Van Horn, NMED HWB  
C. Chavez, EMNRD OCD  
A. Hains, WRG  
L. King, EPA

File: Reading File 2017 and WRG-17-002