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SWMU-14

2019

Marathon Petroleum Company LP

May 20, 2019

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

Re: Work Plan for Hydrocarbon Liquid Removal Pumps at Flare Knock-Out Tank
Marathon Petroleum Company LP
(dba Western Refining Southwest, Inc.)
EPA ID # NMD000333211

Mr. Kieling:

Marathon Petroleum Company LP (Marathon) is submitting this Work Plan for Hydrocarbon Liquid Removal Pumps at the Flare Knock-Out Drum for your review prior to initiating any construction activities at the refinery. Marathon requests that the New Mexico Environmental Department (NMED) review this work plan and provide any comments and/or approval of the proposed activities so that this work can be conducted during pre-turn-around activities at the refinery.

Figure 1 provides a conceptual layout of the hydrocarbon liquid removal pumps. The area where the pumps will be located is known as Solid Waste Management Unit number 14 (SWMU-14) which is the location of the old API Separator (OAPIS). Out of an abundance of caution, in case the soils in the area of the OAPIS contain a listed hazardous waste (K051 – API Separator Sludge), all materials removed from the location will be handled, manifested, shipped and disposed as a hazardous waste. The following pages describe the procedures that will be followed to construct the new hydrocarbon liquid removal pumps. As this is not a remediation activity, no attempt will be made to remove all wastes from the area. Rather, the area will be conditioned so that workers can enter the area without the expectation of being exposed to listed hazardous constituents.

Identification of Subsurface Obstructions

Prior to initiating any excavation activities at the location, a truck mounted hydro excavator will be used to evaluate the subsurface for buried utilities, pipelines and other obstructions. Care will be taken to remain outside the area so that no potentially listed hazardous wastes are incorporated into the excavated material. Once the periphery of the area has been cleared for excavation, a track hoe will be brought in to begin removing soils that are unsuitable to support the proposed equipment.

Removal of Oily Soils

In order to provide a suitable subgrade for the pump, a track hoe will begin removing the in-situ material and placing it into roll-off boxes pending analytical testing for waste classification, manifesting and disposal. The in-situ materials will be excavated to a depth at which stable soils are encountered such that the pump and supporting slab will not shift over time and cause cracking of the concrete slab.

The exact amount of oily soil that will need to be removed is unknown. As previously mentioned, all material that is unsuitable as subgrade will be removed to prevent cracking of the new structure. Prior to initiating excavation activities, Marathon will ensure that an adequate number of empty roll-off boxes are available for use at the refinery.

Following the removal of all soil material that is unsuitable to serve as structural subgrade, a polyethylene liner will be placed in the excavation to prevent the contact of compacted backfill with potential listed hazardous waste material that may remain in the shallow excavation. As previously stated, this activity is not being conducted as a remediation effort, but is an effort to provide a stable subgrade for equipment.

After the polyethylene liner has been placed over the excavated area, clean backfill will be placed over the liner and will be compacted to provide a suitable subgrade for the pump. After the subgrade has been prepared, a concrete slab will be poured to support the pump and provide containment for potential leaks. The slab will be reinforced with rebar to provide structural stability and will also be constructed with reinforced containment walls as shown in Figure 1.

Decontamination of Equipment

The track hoe (and any other equipment) that comes into direct contact with the potential listed waste will be decontaminated using a pressure washer and soap to scrub areas of the equipment that come in direct contact with contaminated soil. The decontamination activities will be conducted by placing the affected portions of equipment in a bermed area lined with polyethylene sheeting to catch wash water. The wash water and detergent will then be transferred to a drum for proper disposal at a facility permitted to receive such material. All polyethylene sheeting and scrubbing utensils will also placed in drums for disposal at a permitted facility.

Confirmation Samples for Documentation

Although the activities described herein are not being conducted as remediation, Marathon will collect bottom and sidewall samples from the excavated area to document conditions at the time of this work. These samples will be analyzed for volatile organic compounds (VOCs), semi volatile organic compounds (SVOCs), total petroleum hydrocarbons (MRO, DRO, and GRO) and Skinner List Metals plus iron and manganese. Marathon will provide the analytical results to the NMED at the conclusion of the field activities.

Health and Safety Plan

Prior to initiating the excavation and construction activities, a site health and safety plan will be developed to ensure that work is conducted in a manner that will minimize the opportunity for exposure to hazardous constituents. Work at the site will require hard hats and splash guards (for face and eye protection) if working near the roll-off box where wastes are being placed for disposal. Disposable chemical resistant coveralls will be worn if the worker is operating within the area of excavation or might otherwise contact the waste material. Disposable rubber gloves will also be used to prevent dermal contact with waste material.

Reporting

At the conclusion of the construction activities, Marathon will provide a summary report to the NMED that documents the removal, manifesting and proper disposal of the impacted soils from the SWMU-14 area. The report will also include the analytical results obtained from soil samples collected from the area of excavation to document concentrations of constituents remaining in area soils at the conclusion of the construction activities.

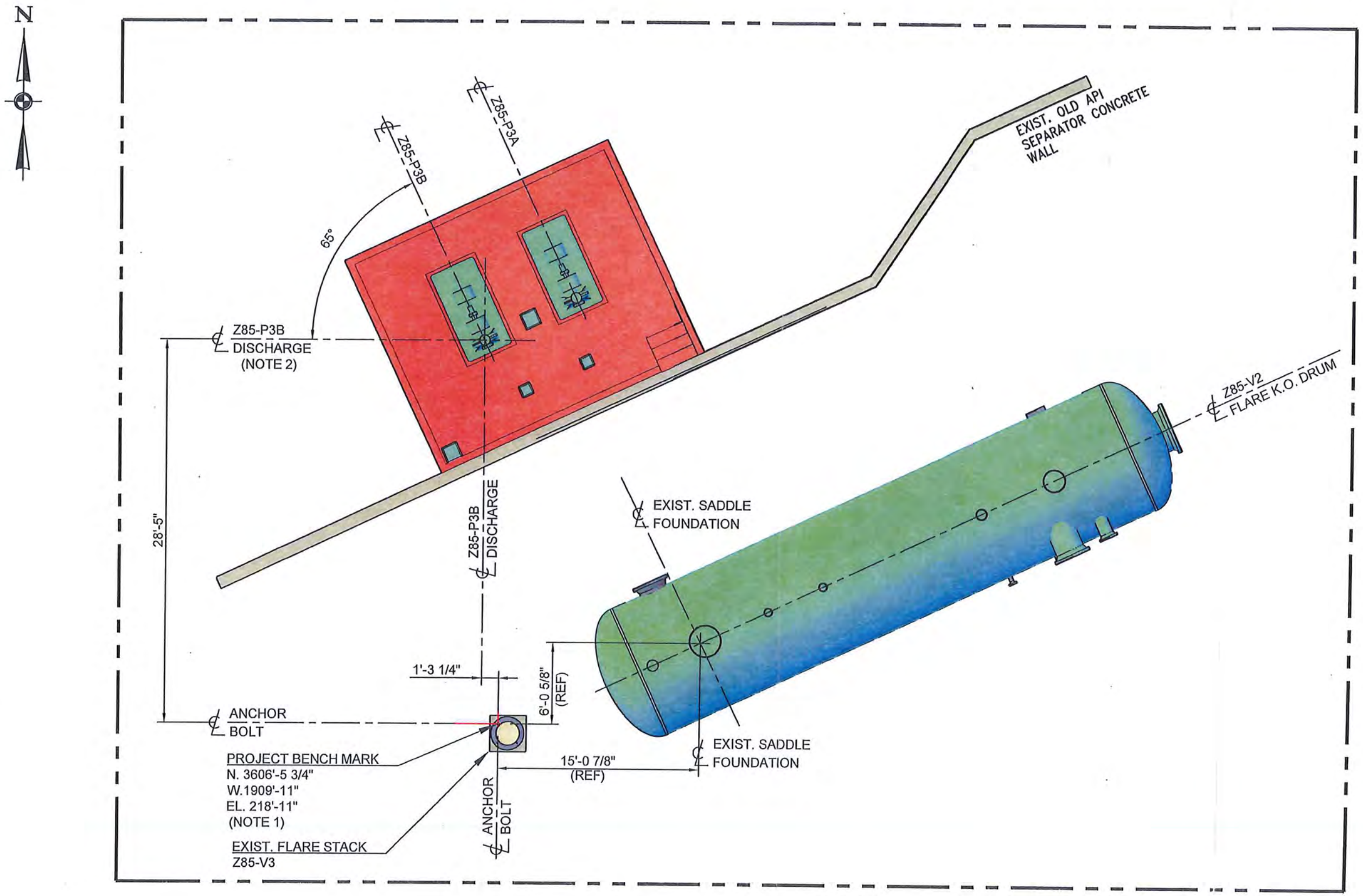
Marathon is providing this work plan to the NMED in order to document the construction activities that are being proposed in the SWMU-14 area. While these activities are for process improvement, this is not a remediation activity. The location for the proposed knock-out happens to be within the boundaries of a SWMU, and Marathon wishes to acknowledge to the NMED that this activity is being planned. Marathon requests the concurrence of the NMED to proceed with the planned upgrade during pre-turn-around activities that are planned to begin within the next month.

If you have questions or require additional information, please do not hesitate to contact me at 505-726-9745 as I would welcome the opportunity to discuss these planned activities with you in more detail.

Sincerely,
Marathon Petroleum Company LP

Brian Moore
Senior HSE Professional

Figure



NOTES
1) PROJECT BENCH MARK LOCATED ON TOP OF NORTH/WEST Z85-V3 FLARE STACK ANCHOR BOLT.
2) FOR FOUNDATION LOCATION PLAN SEE DWG. Z85-03-117.
3) –
4) –
5) –

REFERENCE DWGS.	REV NO.	REVISION DESCRIPTION	JOB No.	DRAWN BY	DATE	CHECKED BY	DATE	APPROVED BY	DATE
Z85-001 PIPING KEY PLAN	0	ISSUED FOR CONSTRUCTION (BGS#1390013)		JTG	05/06/19	DG	05/06/19	NEW	05/06/19

SCALE:	DATE
DRAWN BY: JG	04/30/19
CHK'D BY: DG	04/30/19
APP'D. BY: NEW	04/30/19
ENGINEER:	
AFE NUM:	
MOC NUM:	

ISSUED FOR CONSTRUCTION

TEXAS FIRM NO. F-5417
BURROW GLOBAL SERVICES
BGS PROJECT: 1390013

Z85 UNIT FLARE CAUSTIC IMPROVEMENT EQUIPMENT LOCATION PLAN

Marathon Petroleum Company LP

DWG. FILE NAME: Z85-35-004.dwg

DWG. NO. Z85-35-004

REV. 0