

**GW - 032**

**AOC 31**

**Correspondence**

**2021**



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**

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)



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 5, 2021

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

**RE: APPROVAL  
ASSESSMENT REPORT FOR AOC 31 – TANKS 27 AND 28  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-20-021**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Assessment Report for AOC 31 – Tanks 27 and 28* (Report), dated March 25, 2021, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). The Report was submitted in accordance with the requirements of the January 2017 Consent Order (Consent Order).

The purpose of the Consent Order is to determine whether areas of concern (AOCs) listed in Attachment 1 of the Consent Order require investigation or if the Permittee can provide sufficient information to determine that no further investigation or remediation is necessary.

Consent Order Section IV.B requires NMED to review the Report and determine whether the report "approved, disapproved, or disapproved in part ... " The Permittee provided information

Mr. Moore  
April 5, 2021  
Page 2

required by Consent Order Section IV.C (Contents of AOC Assessment Report). NMED reviewed the Report and hereby issues this Approval.

As specified by the Consent Order Section IV.D (NMED Determination of AOC Entry or Elimination), NMED will make a determination as to whether or not AOC 31 should be restored to the RCRA Permit or eliminated from corrective action requirements after NMED receives the last Assessment Report.

If you have questions regarding this correspondence, please contact Michiya Suzuki of my staff at 505-476-6046.

Sincerely,



Dave Cobrain  
Program Manager  
Hazardous Waste Bureau

cc: M. Suzuki, NMED HWB  
C. Chavez, OCD  
T. McDill, OCD  
L. King, EPA Region 6 (6LCRRC)

File: Reading File and WRG 2021 File

**From:** [Caitlin Fields](#)  
**To:** [Cobrain, Dave, NMENV](#); [Suzuki, Michiya, NMENV](#); [Chavez, Carl J, EMNRD](#)  
**Cc:** [Luka, Kateri A](#); [Moore, John](#); [McCartney, Gregory J.](#); [Heidi Jones](#)  
**Subject:** [EXT] Gallup AOC 31 Assessment Report  
**Date:** Thursday, March 25, 2021 10:28:05 AM  
**Attachments:** [image001.png](#)  
[202103\\_AOC31Cover\\_LTR\\_Signed.pdf](#)

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Hello,

Please find the AOC 31 Assessment Report for the Gallup Refinery. Please let John Moore know if you have any questions.

Thank you,  
Caitlin

**Caitlin Fields**  
**Associate Engineer**

1252 Commerce Drive  
Laramie, Wyoming 82070  
(307) 745-7474 (phone)  
(307) 745-7729 (fax)  
[www.trihydro.com](http://www.trihydro.com)



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**Western Refining Southwest LLC**

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

March 25, 2021

Mr. Kevin Pierard, Chief  
New Mexico Environmental Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505

**RE:       Assessment Report for AOC 31 – Tanks 27 and 28  
          Western Refining Southwest LLC, Gallup Refinery  
          EPA ID #NMD000333211**

Dear Mr. Pierard,

Marathon Petroleum Company LP (dba Western Refining Southwest, LLC) Gallup Refinery is submitting this Assessment Report for the Area of Concern 31 (AOC 31) Tanks 27 and 28 Area required by the Consent Order which specifies that Marathon Petroleum Company submit an Assessment Report for each AOC identified in the Consent Order.

If you have any questions or comments regarding the information contained herein, please do not hesitate to contact Mr. John Moore at (505) 879-7643.

Certification

*I certify under penalty of law that this document and all attachments were prepared under my direction of supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,  
**Marathon Petroleum Company LP, Gallup Refinery**

A handwritten signature in cursive script that reads 'Robert S. Hanks'.

Robert S. Hanks  
Refinery General Manager

Enclosure

cc: D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
C. Chavez, NMOCD  
L. King, EPA Region 6  
G. McCartney, Marathon Petroleum Corporation  
K. Luka, Marathon Petroleum Corporation  
J. Moore, Marathon Gallup Refinery  
H. Jones, Trihydro Corporation

Printed on March 25, 2021

Page 1 of 1



**AOC 31 – Tanks 27 and 28**  
**Consent Order Assessment Report**

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

*See Figure 1 for a topographic area of Area of Concern (AOC) 31 and Figure 2 for the site location and aerial image. AOC 31 includes Tanks 27 and 28.*

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

*AOC 31 consists of Tanks 27 and 28. These tanks are surge tanks to temporarily store combined wastewater and contact stormwater flows prior to treatment in the refinery's wastewater treatment plant. Tanks 27 and 28 are only used when the main equalization tank (Tank 35) is used to its capacity or is out of service for inspection and/or repairs. Tank 35 is located south of AOC 31 and remains in service and used as the primary wastewater collection tank.*

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

*The two tanks have a diameter of 33.5 feet and are 32 feet tall with a working volume of 166,000 gallons. The tanks are made of welded steel with an internal floating roof. AOC 31 is within a containment area with Tank 35 with an adequate capacity for spill containment.*

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

*Based on historical aerial photos, it appears that the tanks may have been installed before 1962 and operated through February 2021.*

- (5) All available site history information;

*The refinery began operation in the late 1950s and 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.*

*Historically, the Gallup Refinery generally processed crude oil from the Four Corners area transported to the facility by pipeline or tanker truck. Various process units that operated at the facility include crude distillation, reforming, fluidized catalytic cracking, alkylation, isomerization, sulfur recovery, merox treater, and hydrotreating. Past operations have produced gasoline, diesel fuels, jet fuels, kerosene, propane, butane, and residual fuel. The refinery also produced commercial products of fertilizer and solid elemental sulfur.*

*The Gallup Refinery transitioned to indefinitely idled in April of 2020. At this time the process units at the facility have been emptied and tanks are being cleaned out and inspected.*

- (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;

*The purpose of the tanks is to temporarily store refinery wastewater and contact stormwater until it can be treated at the wastewater treatment plant. Prior to the construction of the newer wastewater treatment plant in 2010, the tanks served a similar purpose and allowed the*



## Consent Order Assessment Report

*temporary storage of wastewater and contact stormwater to prevent an overflow at the API Separator during storm events.*

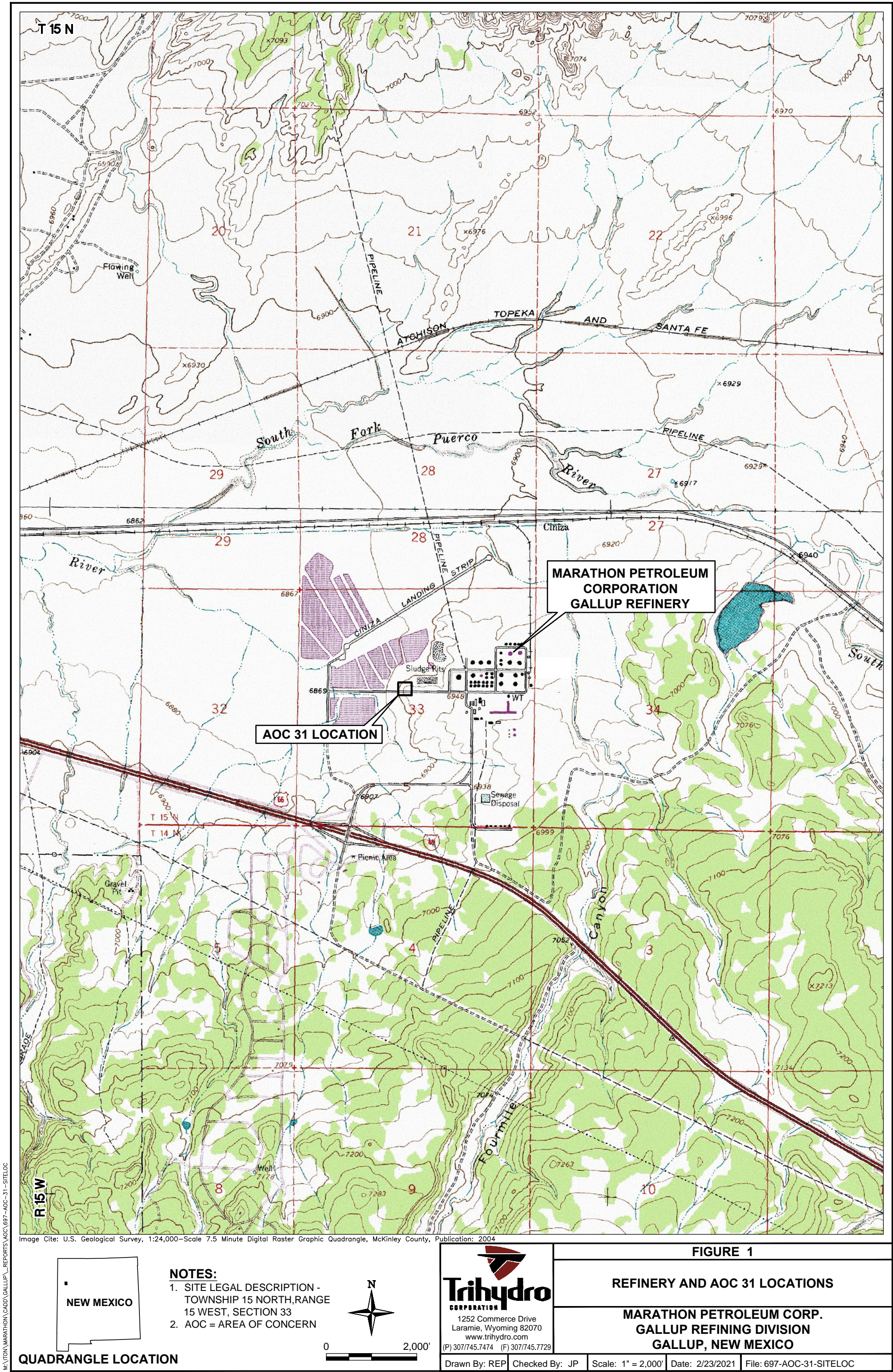
*Samples of wastewater are collected and analyzed frequently and included in annual monitoring reports that are submitted to the New Mexico Environment Department (NMED). As expected, these chemical analyses have shown the presence of petroleum hydrocarbons.–*

- (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).

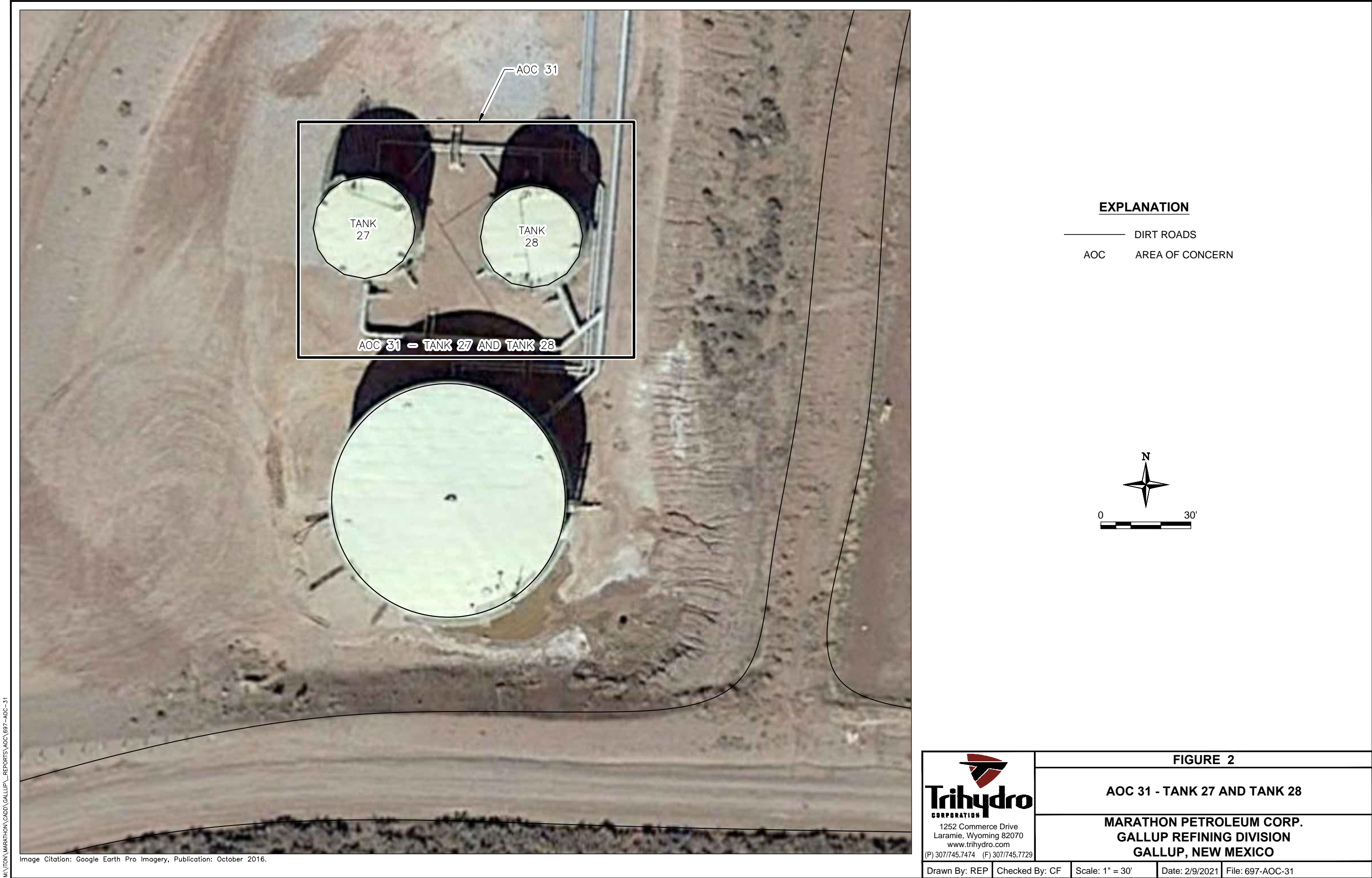
*There are no documented spills from Tanks 27 or 28.*

Figures









M:\TON\MARATHON\CADD\GALLUP\REPORTS\AOC\697-AOC-31

**District I**

1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**

811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**

1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**

1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

COMMENTS

Action 22370

**COMMENTS**

Operator:			OGRID:	Action Number:	Action Type:
WESTERN REFINING SOUTHWEST, IN	6700 Jefferson NE, Suite A-1	Albuquerque,	705791	22370	DISCHARGE
NM87109					PERMIT

Created By	Comment	Comment Date
cchavez	Permittee AOC 31 3-25-2021	03/30/2021

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 22370

**CONDITIONS OF APPROVAL**

Operator: WESTERN REFINING SOUTHWEST, IN NM87109	6700 Jefferson NE, Suite A-1 Albuquerque,	OGRID: 705791	Action Number: 22370	Action Type: DISCHARGE PERMIT
OCD Reviewer cchavez	Condition None			



## Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

March 25, 2021

Mr. Kevin Pierard, Chief  
New Mexico Environmental Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505

**RE:       Assessment Report for AOC 31 – Tanks 27 and 28  
          Western Refining Southwest LLC, Gallup Refinery  
          EPA ID #NMD000333211**

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*I certify under penalty of law that this document and all attachments were prepared under my direction of supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,  
**Marathon Petroleum Company LP, Gallup Refinery**

*Robert S. Hanks*

Robert S. Hanks  
Refinery General Manager

Enclosure

cc: D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
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L. King, EPA Region 6  
G. McCartney, Marathon Petroleum Corporation  
K. Luka, Marathon Petroleum Corporation  
J. Moore, Marathon Gallup Refinery  
H. Jones, Trihydro Corporation



## AOC 31 – Tanks 27 and 28

### Consent Order Assessment Report

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## Consent Order Assessment Report

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*There are no documented spills from Tanks 27 or 28.*

## Figures



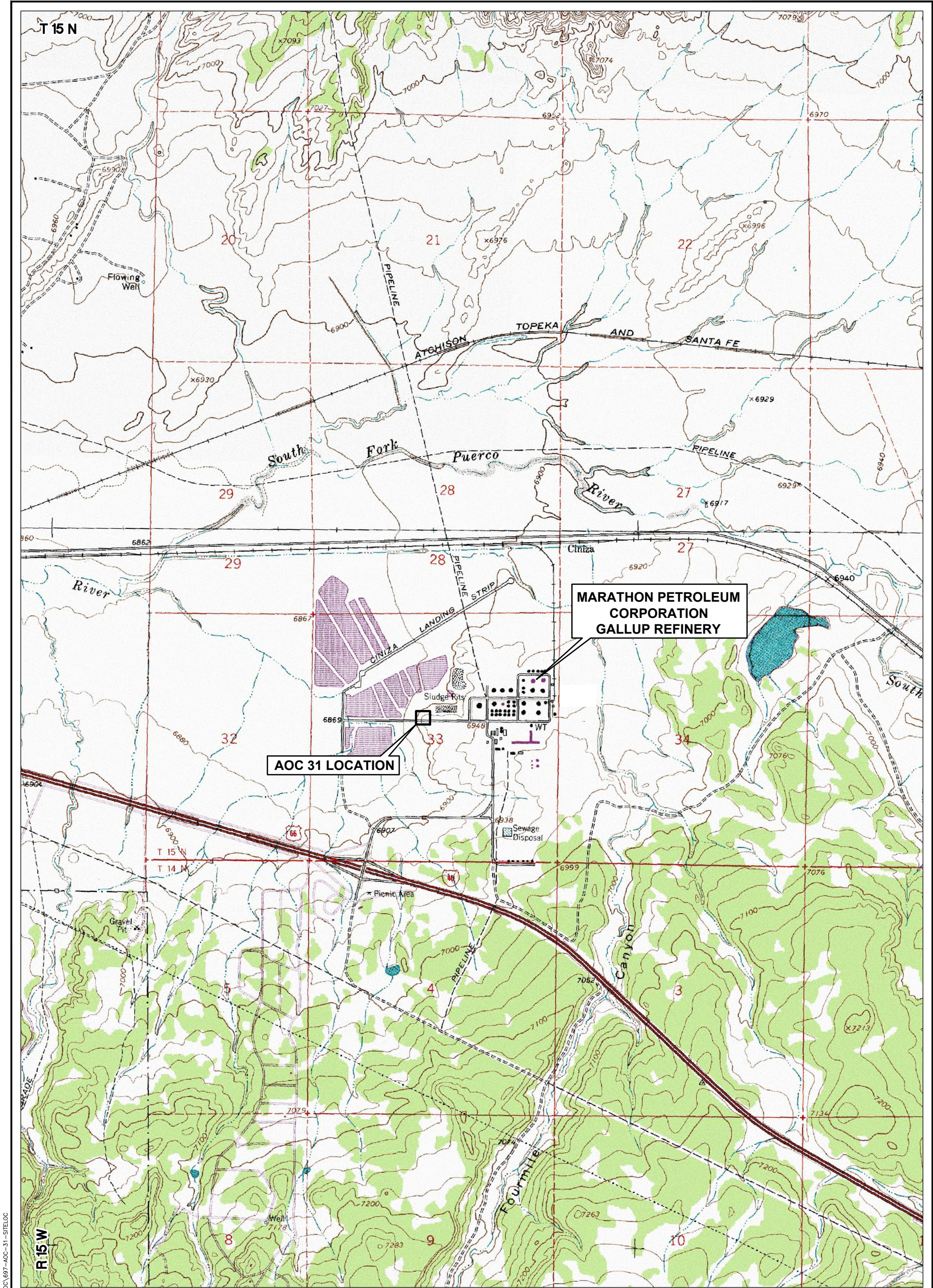


Image Cite: U.S. Geological Survey, 1:24,000--Scale 7.5 Minute Digital Raster Graphic Quadrangle, McKinley County, Publication: 2004

M:\TON\MARATHON CAD\GALLUP\REPORTS\AOC\697-AOC-31-SITELOC

NEW MEXICO

- NOTES:**
1. SITE LEGAL DESCRIPTION - TOWNSHIP 15 NORTH, RANGE 15 WEST, SECTION 33
  2. AOC = AREA OF CONCERN



0 2,000'



FIGURE 1

REFINERY AND AOC 31 LOCATIONS

MARATHON PETROLEUM CORP.  
GALLUP REFINING DIVISION  
GALLUP, NEW MEXICO

Drawn By: REP    Checked By: JP    Scale: 1" = 2,000'    Date: 2/23/2021    File: 697-AOC-31-SITELOC

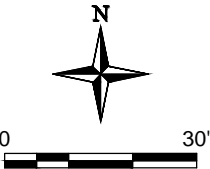





Image Citation: Google Earth Pro Imagery, Publication: October 2016.

**EXPLANATION**

- DIRT ROADS  
AOC AREA OF CONCERN



 1252 Commerce Drive Laramie, Wyoming 82070 www.trihydro.com (P) 307/745.7474 (F) 307/745.7729	<b>FIGURE 2</b>			
	<b>AOC 31 - TANK 27 AND TANK 28</b>			
	<b>MARATHON PETROLEUM CORP. GALLUP REFINING DIVISION GALLUP, NEW MEXICO</b>			
Drawn By: REP	Checked By: CF	Scale: 1" = 30'	Date: 2/9/2021	File: 697-AOC-31