

GW - 032

AOC 34

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
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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 25, 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 34 – SCRAP YARD
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-21-008**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Assessment Report for AOC 34 – Scrap Yard* (Report), dated April 13, 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
May 25, 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 of whether or not AOC 34 should be restored to the RCRA Permit or eliminated from corrective action requirements.

Since this Report is the last Assessment Report required by the Consent Order, NMED will provide a determination regarding the addition of the AOCs listed in the Order to the list of units where corrective action is required in Appendix G, Table G-1 of the Permit under separate cover.

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
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](#); [McDill, Teresa L, EMNRD](#)
Cc: [Luka, Kateri A](#); [Moore, John](#); [McCartney, Gregory J.](#); [Heidi Jones](#)
Subject: [EXT] Gallup AOC 34 Assessment Report
Date: Wednesday, April 14, 2021 8:57:02 AM
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[202104_AOC34Cover_LTR.pdf](#)

Good Morning,

Please find the Gallup Refinery AOC 34 (Scrap Yard) Assessment Report. Please let John Moore know if you have any questions.

Thank you,
Caitlin

Caitlin Fields
Associate Engineer

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Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39
Jamestown, NM 87347

April 13, 2021

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

**RE: Assessment Report for AOC 34 – Scrap Yard
 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 34 (AOC 34) Scrap Yard 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

Robert S. Hanks

Robert S. Hanks
Refinery General Manager

Enclosure



Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39

Jamestown, NM 87347

cc: D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
C. Chavez, NMOCD
T. McDill, 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



AOC 34 – Scrap Yard

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) 34 and Figure 2 for the site location and aerial image. AOC 34 consists of the scrap yard area.

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

AOC 34 consists of the scrap yard. The scrap yard is used primarily to store used equipment (e.g., used steel pipe) after cleaning but before being recycled or sold for scrap. AOC 34 is currently being used as a short term staging area for empty trash bins.

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

The area of the AOC is approximately 550 feet by 500 feet. There are no permanent structures in AOC 34.

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

The date in which the current scrap metal yard came into service is unknown.

- (5) All available site history information;

Based on available historical records, the Gallup 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.

It is MPC's understanding that prior to MPC's ownership in 2017, 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;

Wastes that have historically been stored at the AOC include paint cans as noted by the New Mexico Environment Department (NMED) during an inspection on June 14, 1995. As a result of the June 1995 inspection, a notice of violation (NOV) was issued by the NMED for failure to make a hazardous waste determination of the contents of the identified containers. The containers were stored on pallets and there was no indication of release or threat noted by the NMED inspectors.



Consent Order Assessment Report

Rather the violation was that the required hazardous waste determination had not been completed. The noted issues were addressed and the NOV was closed.

- (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).

Based on available facility records, there have been no documented releases of hazardous waste or hazardous constituents in AOC 34 that required remediation or regulatory agency notification.

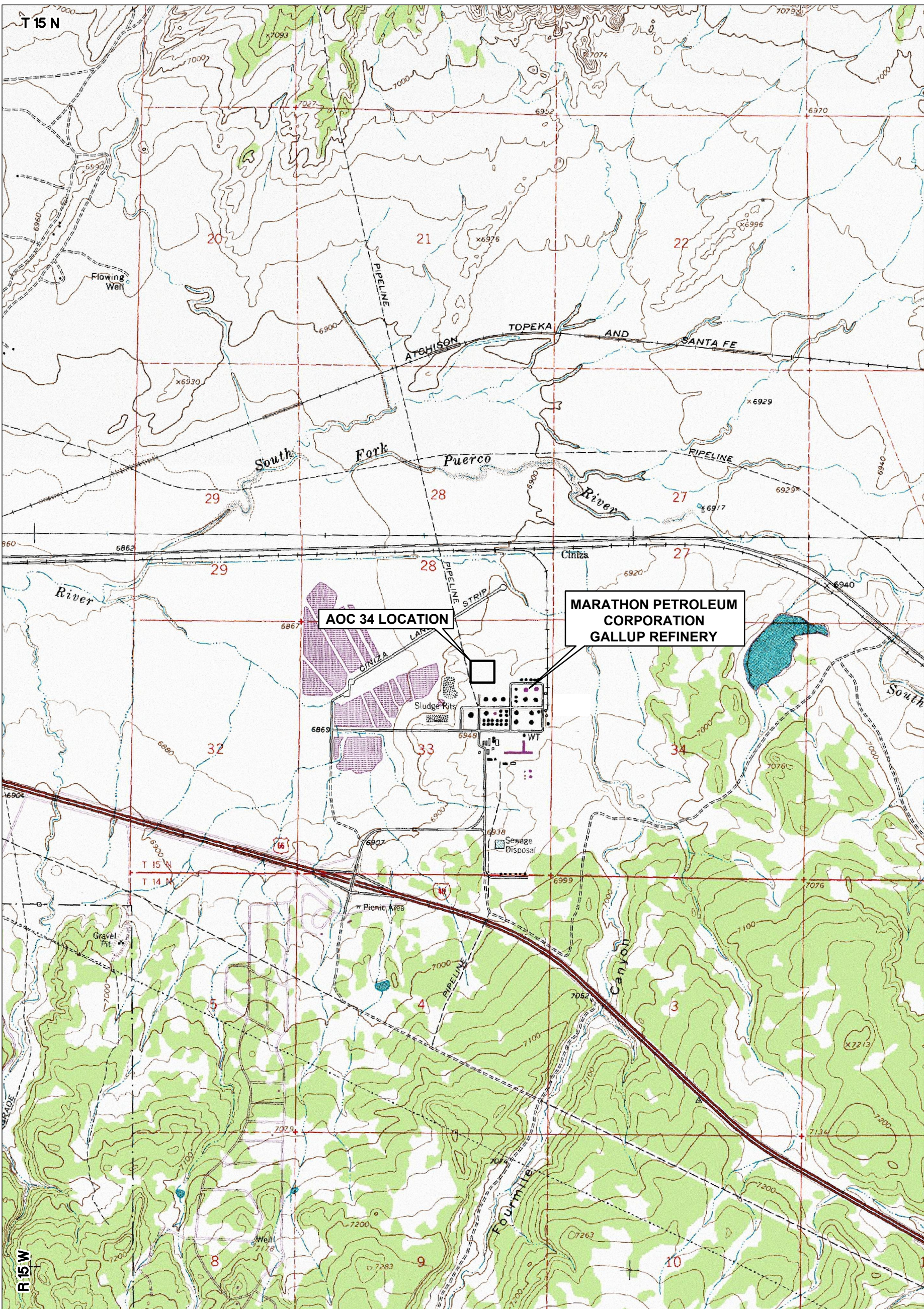
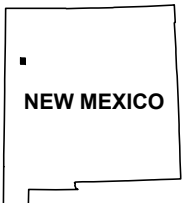
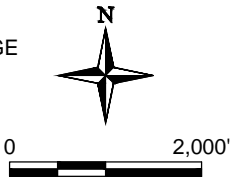


Image Cite: U.S. Geological Survey, 1:24,000—Scale 7.5 Minute Digital Raster Graphic Quadrangle, McKinley County, Publication: 2004



QUADRANGLE LOCATION

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



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FIGURE 1

REFINERY AND AOC 34 LOCATIONS

MARATHON
GALLUP REFINING DIVISION
GALLUP, NEW MEXICO

Drawn By: REP | Checked By: JP | Scale: 1" = 2,000' | Date: 2/9/2021 | File: 697-AOC-34-SITELOC

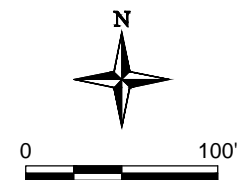
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Image Citation: Google Earth Pro Imagery, Publication: March 2016.

EXPLANATION

	AOC (AREA OF CONCERN)
	SWMU (STORMWATER MANAGEMENT UNIT)
	FENCE
	DIRT ROADS
	AOC AREA OF CONCERN



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FIGURE 2

AOC 34 - SCRAP YARD

MARATHON
GALLUP REFINING DIVISION
GALLUP, NEW MEXICO

Drawn By: REP	Checked By: CF	Scale: 1" = 100'	Date: 4/13/2021	File: 697-AOC-34
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