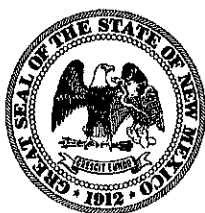


From: [Martinez, Cynthia, NMENV](#)
To: JMoore5@Marathonpetroleum.com
Cc: [Cobrain, Dave, NMENV](#); [Suzuki, Michiya, NMENV](#); [Chavez, Carl J, EMNRD](#); ["king.laurie@epa.gov"](mailto:king.laurie@epa.gov)
Subject: Letter to Mr. Moore
Date: Thursday, March 4, 2021 1:46:29 PM
Attachments: [WRG 2021- HWB-WRG-20-004.pdf](#)

Good Afternoon,
Please see attachment.

Cynthia Martinez
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg.1
Santa Fe, New Mexico 87505-6313



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



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 4, 2021

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

**RE: RESPONSE TO COMMENTS APPROVAL WITH MODIFICATIONS RESPONSE ACTION
REPORT DGS 105 ADDITIVE TANK – RAIL CAR LOADING AREA – GASOLINE RELEASE
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-20-004**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the Response to Comments Approval with Modifications Response Action Report DGS 105 Additive Tank - Rail Car Loading Area - Gasoline Release (Response), dated February 26, 2021, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues the following comment.

Comment 1

The Permittee's response to NMED's Comment 1 states, "[t]he 6% TPH-GRO pore space value was calculated in three steps. The TPH-GRO, TPH-DRO, and TPH-MRO concentrations were averaged based on the data from the three samples collected for waste characterization (Attachment A). Next, the total TPH concentration was calculated by summing the average TPH-

Mr. Moore
March 4, 2021
Page 2

GRO, TPH-DRO, and TPH-MRO concentrations. Then, the average TPH-GRO value (698 mg/kg) was divided by the sum of TPH values (12,095 mg/kg). The resulting value is 6% TPH-GRO. This value assumes that the pore space is saturated and that the TPH values represent 100% of the hydrocarbon in the soil pore space."

The calculations are based on the incorrect assumption of the TPH values representing 100% hydrocarbon saturation in the pore space. The calculations rather represent the fraction of gasoline range organics in total petroleum hydrocarbons. In order to estimate TPH saturation in soil pore space, porosity and density of the soil and specific gravity of the hydrocarbons must be taken into account; otherwise, a discussion associated with TPH saturation level must not be included in future reports as it is misleading. No response required.

If you have questions regarding this letter, 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
L. King, EPA Region 6 (6LCRRC)

File: Reading File and WRG 2021 File

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 19737

COMMENTS

Operator:			OGRID:	Action Number:	Action Type:
WESTERN REFINING SOUTHWEST, IN	6700 Jefferson NE, Suite A-1	Albuquerque,	705791	19737	DISCHARGE
NM87109					PERMIT

Created By	Comment	Comment Date
cchavez	NMED 2021 HWB-WRG 20-004 3-4-2021.	03/04/2021

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

CONDITIONS

Action 19737

CONDITIONS OF APPROVAL

Operator:	OGRID:	Action Number:	Action Type:
WESTERN REFINING SOUTHWEST, IN NM87109	705791	19737	DISCHARGE PERMIT

OCD Reviewer	Condition
cchavez	None