AP - 111

AOC - 18
Asphalt Tank Farm Assessment Report

Marathon Petroleum Company LP

March 28, 2019

Mr. John E. Kieling, Chief
New Mexico Environmental Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87SOS-6303

RE: Area Of Concern 18 – Asphalt Tank Farm
Assessment Report
January 20, 2017 Order Of Consent
Marathon Petroleum Company LP, Gallup Refinery
(dba Western Refining Southwest Inc.)
EPA ID # NMD000333211

Dear Mr. Kieling:

Gallup Refinery is submitting the enclosed Assessment Report for Area of Concern (AOC) 18 – Asphalt Tank Farm (Tanks 701-709, 713, and 714) pursuant to Section IV.B of the Order on Consent, which was signed on January 20, 2017. If there are any questions, please call John Moore at 505-722-0205.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or 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

Robert S. Hanks
Refinery General Manager

Enclosure

cc K. Van Horn NMED
C. Chavez NMOCD
B. Moore Marathon Gallup Refinery

92 Giant Crossing Road
Jamestown, NM 87347

AREA OF CONCERN ASSESSMENT REPORT
AOC 18 – Asphalt Tank Farm (Tanks 701-709, 713, 714)

(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 Area of Concern (AOC) 18 (Figures 1 and 2).

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

The Asphalt Tank Farm (AOC 18) is located on the south side of the main Process Area and generally in the southeastern portion of the refinery operations. It has been used for storage of feed for the Fluidized Catalytic Cracking (FCC) Unit, asphalt base and other heavy-end petroleum products (e.g., fuel oil). The AOC was identified based on past releases as described in item 7 below.

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

The AOC is estimated to cover an area approximately by 250 feet wide by 400 feet long and includes 10 aboveground storage tanks (Figure 3). The tanks dimensions and capacities are summarized in the table below.

Tank ID	Dimensions Diameter/Height	Capacity (gallons)	Structural Description
TK-701	88’ 6”/33’ 10”	37,000	vertical steel
TK-702	67’ 0”/40’ 5”	25,000	vertical steel
TK-703	67’ 0”/39’ 9”	25,000	vertical steel
TK-704	47’ 4”/32’ 1”	10,000	vertical steel
TK-705	47’ 4”/32’ 1”	10,000	vertical steel
TK-706	47’ 4”/32’ 1”	10,000	vertical steel
TK-707	26’ 6”/17’ 7”	1,000	vertical steel
TK-708	22’ 6”/14’ 11”	1,000	vertical steel
TK-709	22’ 6”/14’ 9”	1,000	vertical steel
TK-713	No data	No data	vertical steel
TK-714	73’ 4”/40’ 0”	30,000	vertical steel

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

The first tanks (TK-701 through TK-707) were constructed in 1963 and it is believed the tank farm has been in continuous operation since that time.

(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.

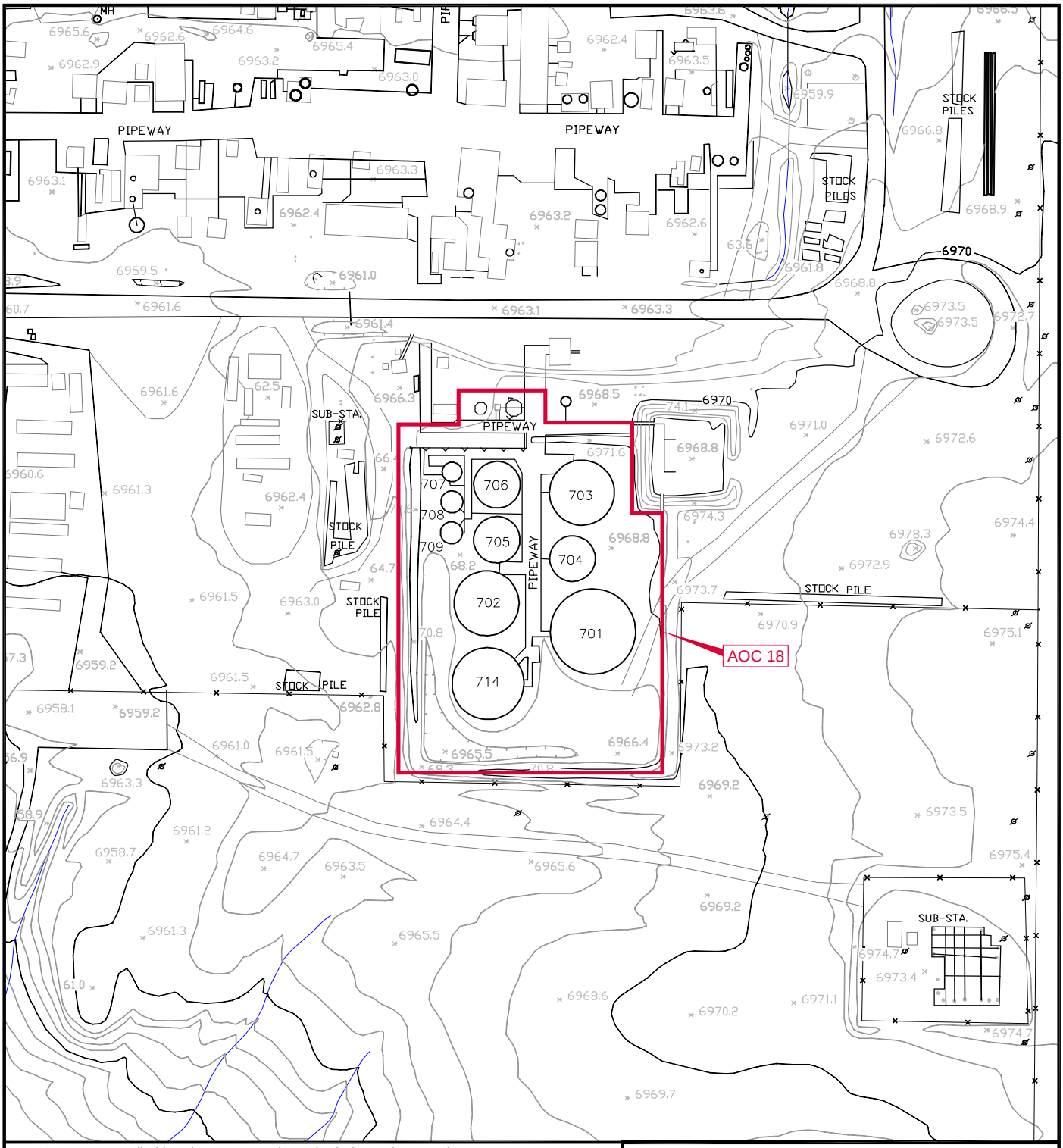
(6) specifications of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous waste or hazardous constituents in the wastes;

No wastes are known to have been managed at the AOC. Only petroleum intermediates (e.g., feed for the FCC Unit), asphalt base and other heavy-end petroleum products (e.g., fuel oil) have been stored in the Asphalt Tank Farm.

(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 storage tanks and piping are potential sources of releases from AOC 18 and that the Department had received two C-141 Release Notification reports for spills at AOC 18. On September 16, 2007, approximately 200 barrels (8,400 gallons) of heavy oil (feed oil for fluidized catalytic cracking) was spilled when operators attempted to pump the oil into a full tank (Release Notification dated Sept. 19, 2007); and on March 19, 2008, approximately 5 to 6 barrels (210 to 252 gallons) of fuel oil were spilled when a pump failed (Release Notification dated March 26, 2008). Again, some but not all of the spilled material was recovered. A vacuum truck was also used to clean up several spills at AOC 19 in 2010 (Vacuum Truck Log Sheet for November 5, 2009). Photographs taken during an inspection in 2001 show streaks of oil on pipes and valves, oil and oil staining on the ground, and other evidence of spills around the asphalt tanks.

A release an estimated 1,543 barrels of FCC feed from Tank T-714 occurred on February 5, 2016 (Figure 3). The details of the release and the subsequent spill response to remove the impacted soils was documented in a Response Action Report that was submitted to the NMED and New Mexico Oil Conservation Division on January 10, 2017. NMED issued an Approval for the Response Action Report on June 1, 2017, with a comment noting, "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.



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

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SCALE IN FEET

NEW MEXICO

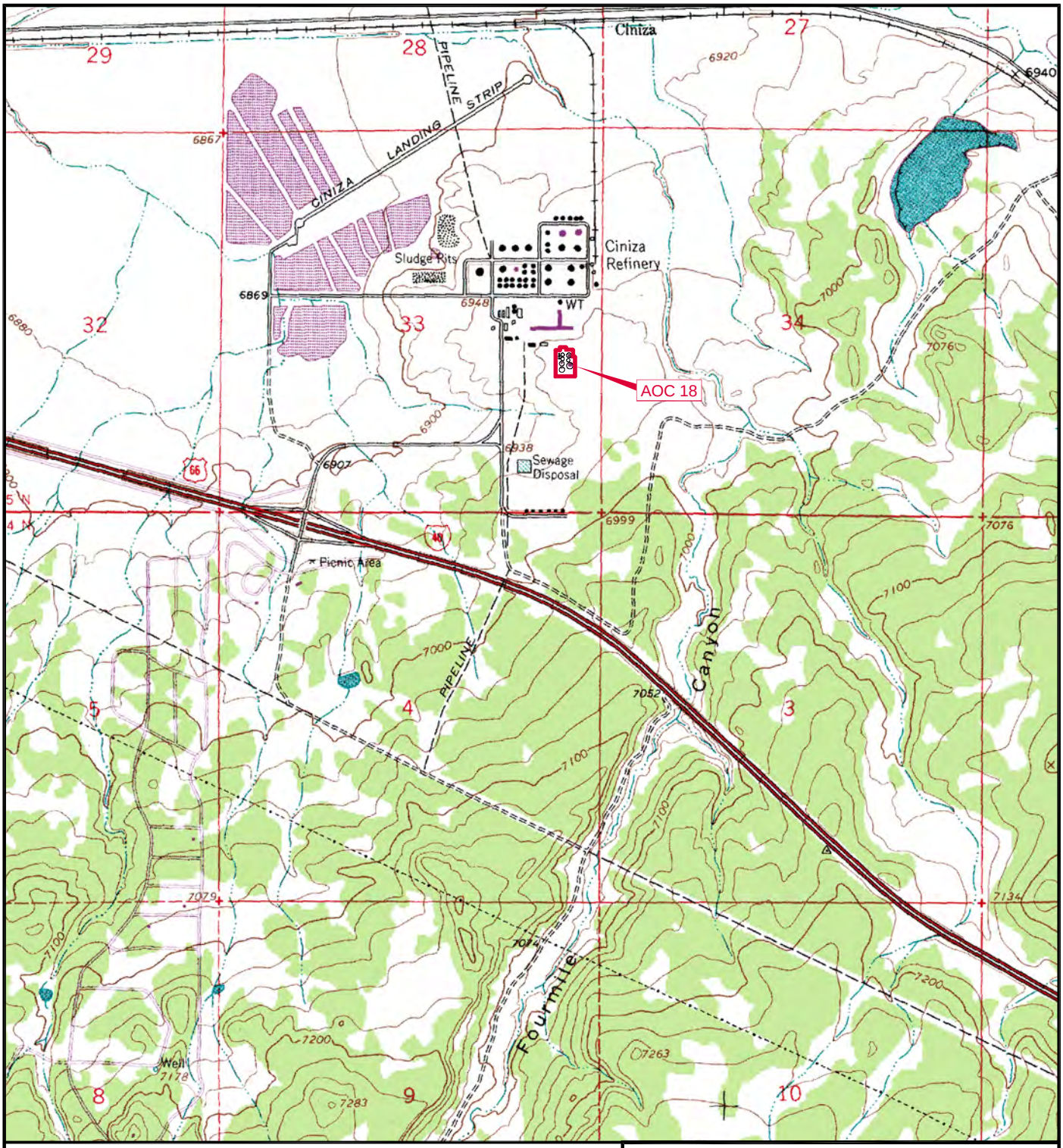
SITE LOCATION

MARATHON PETROLEUM COMPANY
GALLUP REFINERY

PROJ. NO.: Marathon	DATE: 03/18/19	FILE: Mathon-dA154

FIGURE 1
SITE LOCATION MAP
AOC 18 AREA

DiSorbo
Environmental Consulting Firm
8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759



Map Source: USGS 7.5 min Quad, CINIZA, NEW MEXICO, 1962, Photorevised 1980.

MARATHON PETROLEUM COMPANY
GALLUP REFINERY

PROJ. NO.: Marathon	DATE: 03/19/19	FILE: Mathon-dA155

FIGURE 2
SITE LOCATION MAP
AOC 18 AREA

N

0 2000
SCALE IN FEET

NEW MEXICO
SITE LOCATION

DiSorbo
Environmental Consulting Firm
8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759

Aerial Source: Google Maps, 03/18/2016

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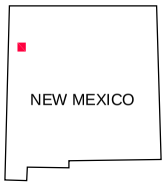
0 250
SCALE IN FEET



QUADRANGLE LOCATION

MARATHON PETROLEUM COMPANY
GALLUP REFINERY

PROJ. NO.: Marathon	DATE: 03/20/19	FILE: Mathon–dA58

FIGURE 3

AERIAL PHOTO OF
TANK T-714

DiSorbo
Environmental Consulting Firm
8501 N. MoPac Expy.
Suite 300
Austin, Texas 78759