

**AP - 111**

**SWMU-1**

**2019**



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**

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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

January 29, 2020

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

**RE: APPROVAL WITH MODIFICATIONS  
OW-61 THROUGH OW-65 WELL INSTALLATION REPORT  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-19-020**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *OW-61 through OW-65 Well Installation Report* (Report), dated November 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

**Comment 1**

In the Executive Summary, the Permittee states, "[t]hese wells [OW-61, OW-62, OW-63, OW-64, and OW-65] were installed in March 2018 on a voluntary basis after hydrocarbons were observed in the French drain near the pond STP-1." These wells were advanced within and in close vicinity of the Tank Farm (SWMU 6); however, based on the results of shallow excavation near pond STP-1 hydrocarbons were also observed in soils above the water table near pond STP-1. The observation of SPH in shallow soils suggests that a source may also be present near pond STP-1 in addition to potential leaky tanks in the Tank Farm. Unless a source closer to STP-

1 was identified through the Laser Induced Fluorescence (LIF) study or other investigations, the source of shallow soil contamination near pond STP-1 must be investigated.

**Comment 2**

In Section 2, *Background*, the Permittee states, “[s]ix locations were selected as shown on Figure 1 for the installation of soil borings to search for the presence of SPH.” There is a typographical error in the statement. Figure 1 depicts the location of the site. The pertinent figure is Figure 2, *Well Location Map*. No revision required.

**Comment 3**

In Section 4.3.1, *Well Installation*, the Permittee states that discrete soil samples were not retained for laboratory analysis. NMED requires soil sampling from every soil boring for laboratory analysis. A minimum of three soil samples should have been collected from each boring at the vadose zone with the highest PID reading, at the water table, and the boring termination depth. Include the provision for all future soil investigations conducted at the Facility. No revision required.

**Comment 4**

In Section 4.3.1, *Well Installation, OW-61*, the Permittee states that a strong chemical odor was detected at 10 – 12 feet below ground surface (bgs). There was no data to evaluate presence or absence of contamination above 10 feet bgs, because hydro-excavation was used during the installation of the soil boring. Since soil contamination was present in the soils at the depth of 10 feet bgs (PID reading = 1,563 ppm), the Permittee must assume soil contamination above 10 feet bgs in the vicinity of well OW-61. The transport mechanism of soil contamination may be limited to groundwater flow in the vicinity of well OW-61; however, the shallow soils were contaminated. Evaluate and explain potential causes of the shallow soil contamination (e.g., potential leaks from nearby tanks, volatilization of chemicals from smear zone) in a response letter.

**Comment 5**

In Section 4.3.1, *Well Installation, OW-65*, hydro-excavation was not used at the location of boring OW-65. The investigation method was appropriate at this location. It was confirmed that there was no soil contamination present above 10 feet bgs. This is the only location where hydro-excavation was not used during the installation of borings. Explain why this location did not require use of hydro-excavation for clearance in the response letter.

**Comment 6**

In Section 5, *Site Impacts*, the Permittee states, “[t]he measured SPH thickness increased in OW-61 from the first through the third quarter of 2018, with a decrease in the last quarter of 2018. The measured SPH thickness in OW-65 increased from the first quarter to the second quarter of 2018, but decreased in the third quarterly, only to increase to an even greater thickness in the fourth quarter of 2018.” The SPH thicknesses measured in wells OW-61 and

OW-65 are recorded as 4.05 feet and 7.75 feet, respectively, during November 2018 according to Table 2, *2018 Quarterly Fluid Level Measurements*. The increase may indicate that the hydrocarbon release is potentially on-going. In the response letter, provide a table that shows the SPH thicknesses in wells OW-61 and OW-65 measured during the 2019 quarterly monitoring events.

**Comment 7**

In Section 5, *Site Impacts*, the Permittee states, "[t]he laboratory interpreted the results to show that the product collected at OW-61 was 'mostly fresh [to] fairly fresh gasoline with a small amount of diesel range hydrocarbons present as well.'" The laboratory interpreted the results to show that the product collected at OW-65 was "fairly fresh gasoline mixed with diesel range hydrocarbons."" It appears SPH collected from wells OW-61 and OW-65 is similar. SPH observed in the wells likely originates from the same source. Include a discussion regarding the potential source of SPH detected in wells OW-61 and OW-65 in the response letter.

The Permittee must address all comments in this letter and submit a response letter no later than **April 30, 2020**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

If you have questions regarding this Approval with Modifications, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,



Kevin Pierard  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
C. Chavez, OCD  
L. King, EPA Region 6 (6LCRRC)  
B. Moore, WRG

File: Reading File and WRG 2020 File  
HWB-WRG-19-020



**Marathon  
Petroleum Company LP**

December 16, 2019

Mr. Dave Cobrain  
New Mexico Environmental Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303

**RE: Response to Approval with Modifications**  
Investigation Work Plan Solid Waste Management Unit 1  
Marathon Petroleum Company LP, Gallup Refinery  
(dba Western Refining Southwest, Inc.)  
EPA ID# NMD000333211

Dear Mr. Cobrain:

Marathon Petroleum Company LP (dba Western Refining Southwest, Inc.) Gallup Refinery is submitting this response to comments for the Investigation Work Plan for the Solid Waste Management Unit (SWMU) 1. If there are any questions, please call Brian Moore at 505-726-9745.

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, Gallup Refinery

*Robert S. Hanks*

Robert S. Hanks  
Refinery General Manager

Enclosure

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



**RESPONSE TO APPROVAL WITH MODIFICATIONS SWMU-1 SOIL  
SAMPLING INVESTIGATION WORK PLAN**

**NMED Comment 1:**

Under the "Scope of Activities" heading, the Permittee states, "[o]nce characterization has been completed, MPC will prepare an investigation report with results from the sampling. A risk assessment will be included with the investigation report." Since a soil removal action is planned for the remedy at the site, there is no need to conduct a risk assessment.

**MPC Response 1:**

The comment is acknowledged.

**NMED Comment 2:**

Under the heading "Scope of Activities" the Permittee states, "[s]oil recovered during sampling will be placed in roll-off boxes within the area of SWMU 1 and characterized prior to disposal." Alternately, the Permittee may return the soil cutting to the bore hole.

**MPC Response 2:**

The comment is acknowledged that the soil cuttings may also be returned to the bore hole.

**NMED Comment 3:**

Under the heading "Investigation Methods", the Permittee states, "[s]oil samples will be collected by hand-augering within SWMU 1 and along the perimeter sidewalls (Figure 3). Discrete sediment samples will be collected at 2.5-ft intervals from the surface until visual and/or instrumental contamination is no longer evident, or until a maximum depth of approximately 8 feet is reached." The Permittee does not specify if the berm sidewall samples will be collected using a hand auger or with a different tool and does not specify to what depth/horizontal position the berm sidewall samples will be collected. Provide this information in a response letter.

**MPC Response 3:**

SWMU 1 sidewall soil samples along the berm will be collected using a hand auger. The first sample will be collected from the top surface of the berm and advanced 1-foot vertically into the berm. The next sample will be collected approximately 2.5-foot below the top of the berm (Figure 3a) and advanced 1 foot horizontally into the berm side wall. Additional samples will be collected approximately at 2.5-foot intervals until the toe of the berm is reached. Samples at the toe of the

**RESPONSE TO APPROVAL WITH MODIFICATIONS SWMU-1 SOIL  
SAMPLING INVESTIGATION WORK PLAN**

berm will be collected vertically from the surface, at 2.5-foot intervals to an 8-foot maximum depth or until visual staining and/or no instrumental response is detected (Figure 3a). A sample will also be collected from any saturated intervals.

**NMED Comment 4:**

Under the heading "Sample Collection Procedures", the Permittee states, "[f]ield techniques will be applied consistently across SWMU 1 by a team of dedicated sampling personnel who may be assisted by site supervisors." RCRA Permit Section IV.J.2.d requires the presence of a qualified engineer or geologist, ensure that the proper procedures are followed in the field during sampling.

**MPC Response 4:**

The comment is acknowledged. A qualified geologist or engineer will be present during the sampling.

**NMED Comment 5:**

Under the heading "Sample Collection Procedures", item 2, regarding collection of soil and sediment samples for laboratory analysis the Permittee proposes to collect toxicity characteristic leaching procedure (TCLP samples) for lead and mercury. The Permittee must also conduct TCLP analysis for benzene.

**MPC Response 5:**

The comment is acknowledged. TCLP analysis for benzene will also be conducted.

**NMED Comment 6:**

Under the heading "Sample Collection Procedures" and the heading "Data Evaluation" the Permittee states that, "[a]nalytical data will be screened by comparison with NMED Industrial SSLs, Toxicity Characteristic levels, and the proposed (chosen) disposal facility WACs." The Permittee must also compare the analytical results to Residential SSLs and Land Disposal Restrictions, as necessary. The waste disposal facility WACs cannot be used for the risk assessment.

**MPC Response 6:**

**RESPONSE TO APPROVAL WITH MODIFICATIONS SWMU-1 SOIL  
SAMPLING INVESTIGATION WORK PLAN**

The comment is acknowledged. The waste disposal facility WAC will not be used for risk assessment purposes.

**NMED Comment 7:**

Under the heading "Sample Collection Frequency" the Permittee states, "Sediment sample collections will be taken in accordance with the RCRA Post-Closure Permit Section IV.J.2.d.ii (Soil and Rock Sampling) and will include the following applicable intervals and depths:

- at the surface of the proposed boring locations;
- at 2.5-ft intervals;
- at the maximum depth of each boring; and
- at intervals suspected of being source or contaminated zones."

---

The Permittee must also collect samples from intervals where groundwater is encountered.

**MPC Response 7:**

The comment is acknowledged. If groundwater is encountered, a soil sample will be collected at that interval.

**NMED Comment 8:**

The Permittee included a Standard Operating Procedure (SOP) (Appendix A) for soil sample collection. RCRA Permit Section IV.J.1 states that "[t]he Permittee shall provide a brief description of investigation, sampling or analytical methods and procedures...Facility standard operating procedures (SOPs) shall not be substituted for such descriptions." In the future, the Permittee must include this information within the main text of the Work Plan. The SOP appears to be field instructions for personnel and is generalized for all soil sampling rather than specific to the sampling that will take place for this project.

**MPC Response 8:**

The comment is acknowledged. In future work plans, standard operating procedures will be included in the text and will relate to the specific tasks for that project.



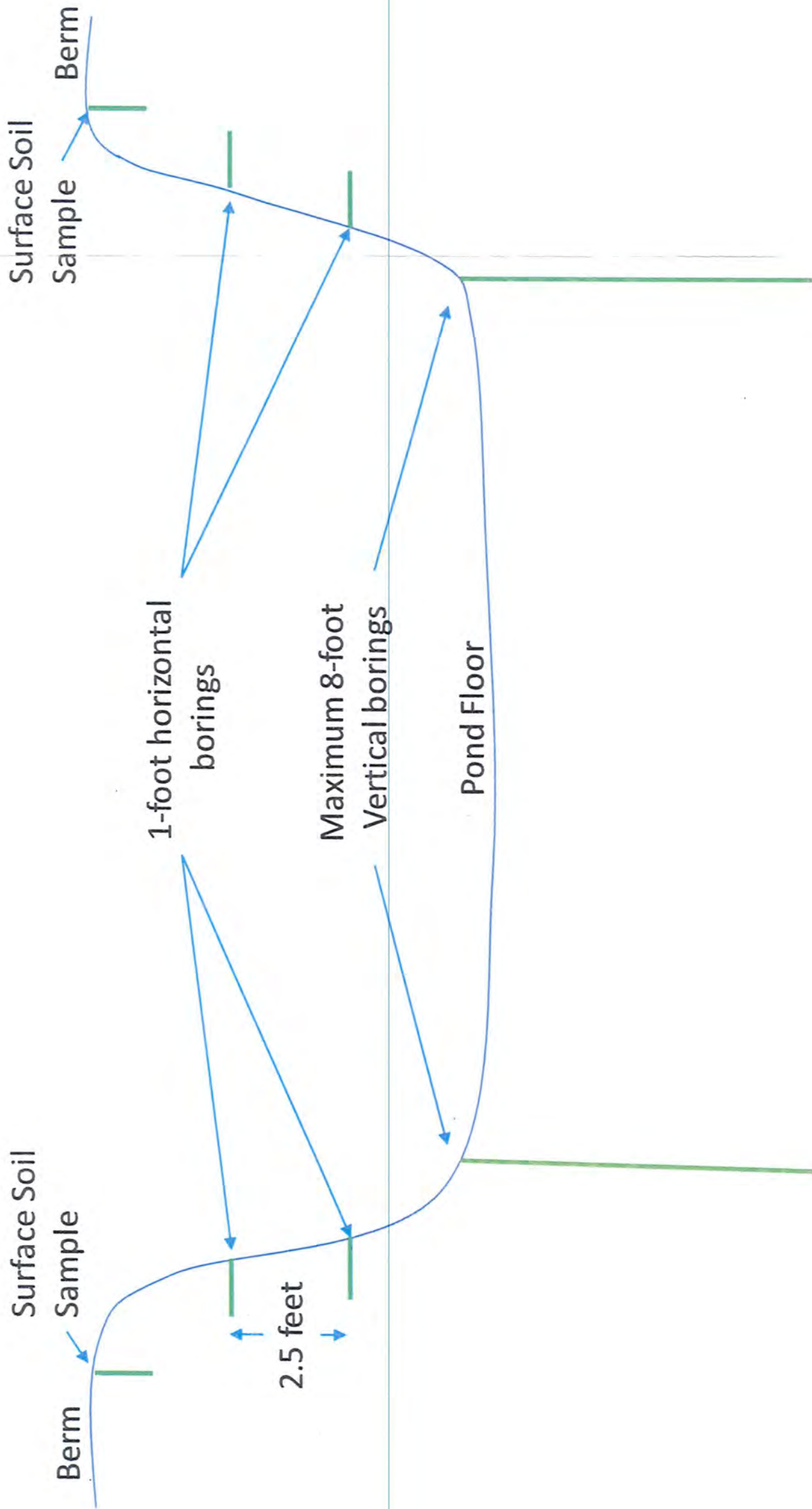


FIGURE 3a

SIDEWALL SAMPLING PLAN

SWMU 1 SOILS INVESTIGATION WORK PLAN  
GALLUP REFINING DIVISION  
GALLUP, NEW MEXICO



1252 Commerce Drive  
Laramie, WY 82070  
www.trihydro.com  
(P) 307/745.7474 (F) 307/745.7729

Drawn By: PH    Checked By: HJ

Scale: Not to Scale

Date: 11/4/19

File: SWMU-1\_SideSamp\_Fig1a.mxd



September 23, 2019

Mr. John E. Kieling, Chief  
New Mexico Environmental Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303

**RE: Investigation Work Plan Solid Waste Management Unit 1  
Marathon Petroleum Company LP, Gallup Refinery  
(dba Western Refining Southwest, Inc.)  
EPA ID# NMD000333211**

Dear Mr. Kieling:

Marathon Petroleum Company LP (dba Western Refining Southwest, Inc.) Gallup Refinery is submitting this Investigation Work Plan for the Solid Waste Management Unit (SWMU) 1. The Investigation Work Plan has been enclosed for your review. If there are any questions, please call Brian Moore at 505-726-9745.

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, Gallup Refinery**

A handwritten signature in blue ink that reads 'Robert S. Hanks'.

Robert S. Hanks  
Refinery General Manager

Enclosure

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



**MARATHON PETROLEUM CORPORATION**

**GALLUP REFINING DIVISION**

**SWMU-1 SOIL SAMPLING INVESTIGATION WORK**

**PLAN**


**SEPTEMBER 23, 2019**

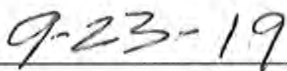
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## Approval to Proceed

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.

  
Name: Brian Moore

  
Date

Title: Senior HSE Professional



## Executive Summary

The Marathon Petroleum Company, Gallup Refining Division is submitting this Investigation Work Plan for the sampling of sediments contained in the former aeration lagoons and evaporation pond known as Solid Waste Management Unit (SWMU) 1.

SWMU-1 was a part of a former aggressive biological treatment unit where refinery wastewater flowed through the aeration lagoons and then into the evaporation pond. Based on this usage the aeration lagoon sediments are most likely hazardous waste and the evaporation pond sediments may be classified as non-hazardous waste. This Work Plan was developed to sample the sediments and the underlying soils to further delineate the impacts to the subsurface from historical usage.

Historical sampling and sediment thickness measurements were completed in April 2008 by Trihydro Corporation to help determine the appropriate disposal of sediments within SWMU-1. Data from the 2008 sampling was used to characterize sediments. Sediment volumes were calculated based on the approximate dimensions of the lagoons and the evaporation pond. This Work Plan and additional sampling will help to further delineate the horizontal and vertical extent of the contamination within the lagoons and pond.

This Investigation Work Plan will collect samples within the lagoons and pond of both sediments (similar to the 2008 sampling) and soils beneath the lagoon and pond sediments. This sampling will close any data gaps from the historical sampling and will be utilized to develop an excavation plan so that MPC can apply for SWMU-1 closure.





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## Introduction

The Marathon Petroleum Company (MPC), Gallup Refining Division (Refinery) is located approximately 17 miles east of Gallup, McKinley County, New Mexico along the north side of Interstate Highway I-40 (Figure 1). The physical address is I-40, Exit #39 Jamestown, New Mexico 87347. The Refinery property covers approximately 810 acres.

Trihydro Corporation (Trihydro) has prepared this report proposing an Investigation Work Plan for sampling of sediments and soils contained in, and beneath, the former aeration lagoons and evaporation pond known as Solid Waste Management Unit (SWMU) 1 at the Refinery.

The Refinery is a crude oil refinery that processes crude oil transported by pipeline or tanker truck from the Four Corners region. Various process units operated at the Refinery include: crude distillation, reformer, fluidized catalytic cracker, alkylation, sulfur recovery, mercox treater, and hydrotreater. Current and past operations have produced gasoline, diesel fuels, jet fuels, kerosene, propane, butane, and residual fuel.

## Background

SWMU-1 consists of the former aeration lagoons (AL-1 and AL-2) and an evaporation pond (EP-1). These areas were part of the aggressive biological treatment unit (ABTU) formerly used at the Refinery. Refinery wastewater flowed from AL-1 to AL-2, followed by flow to EP-1 for evaporation. Based on this usage, AL-1 and AL-2 sediments can be reasonably classified as listed hazardous waste (F037/F038), whereas sediments in EP-1 by definition would not be classified as a listed hazardous waste.

AL-1, AL-2, and EP-1 were constructed in 1987 and were in operation until 2013. AL-1 and AL-2 are approximately 0.3 acres and 0.5 acres, respectively, and EP-1 is approximately 1.3 acres. The Refinery's process wastewater would flow to an American Petroleum Institute (API) separator with benzene air strippers and then flow into the two aeration lagoons in series; the lagoons were equipped with surface aerators to help achieve biological activity. The evaporation pond would be the final phase of the wastewater treatment before being discharged to the evaporation ponds at the Refinery. AL-1, AL-2 and EP-1 are earthen surface impoundments with natural clay functioning as a bottom liner (DiSorbo 2018, Section 2.1.1).

Prior sampling of the sediments and laboratory analysis were last conducted in 2008 of AL-1, AL-2, and EP-1 (Trihydro 2008, Section 7). Laboratory sampling analyses of the sediments consisted of total petroleum



hydrocarbons (TPH), diesel range organics (DRO), and gasoline range organics (GRO) by United States Environmental Protection Agency (USEPA) method 8015, semi-volatile organic compounds (SVOCs) by USEPA method 8270, volatile organic compounds (VOCs) by USEPA Method 8260, Resource Conservation and Recovery Act (RCRA) metals by USEPA Method 6010C, and mercury by USEPA Method 7471. The Toxicity Characteristics Leaching Procedure (TCLP) analysis was not performed.

In the 2008 report (Trihydro 2008, Section 6), standards for comparison consisted of NMED Industrial Soil Screening Levels (SSLs) and EPA's Maximum Concentrations of Contaminants for the Toxicity Characteristic (CFR Title 40 Part 261). In the absence of TCLP analyses, TCLP data were approximated using an EPA-approved RCRA calculation wherein soil analytical data were decreased by a factor of 20, which allowed a comparison against RCRA Toxicity Characteristic levels as a screening tool. Exceedances with respect to these comparison standards are discussed below.

Twenty-six samples from various sediment depths in the three areas exceeded the Toxicity Characteristic for mercury, and three samples from AL-1 exceeded the Toxicity Characteristic for lead. These results for TCLP are estimates based on the approximation described above and will be confirmed with actual TCLP analyses proposed in this plan.

During this sampling Trihydro also determined the approximate thickness and volume of the sediments in SWMU-1:

- AL-1: 3.5 feet (ft) to 6.0 ft, 1,700 cubic yards (cy)
- AL-2: 6.5 ft to 9.6 ft, 3,800 cy
- EP-1: 1.2 ft to 5.1 ft, 3,200 cy

At the time of the 2008 SWMU-1 sampling event, a boat was required for access and sediment volume estimates reflect fully saturated conditions. In order to collect sediment and soil samples the ponds must be drained prior to sampling. Per MPC's conversations with the New Mexico Environmental Department (NMED) on August 14<sup>th</sup>, 2019, MPC will install French Drains along the east and south sides of SWMU-1 and two sumps on the southern side of AL-1 and AL-2 in order to dewater the ponds and prevent further groundwater infiltration.



The purpose of the previous sediment investigations was to determine and evaluate the presence, nature, and extent of contaminant releases within SWMU-1. The purpose of this sediment investigation is to further delineate the existing soil impacts to finalize an excavation and closure plan for SWMU-1. This investigation will complete characterization of the soil and volume of sediment for removal within the lagoons and pond.

## Site Conditions

### Surface Conditions

Local site topographic features include high ground in the southeast gradually decreasing to a lowland fluvial plain to the northwest. Elevations on the refinery property range from 7,040 ft to 6,860 ft. The area near the ponds is at an approximate elevation of 6,910 ft above mean sea level (amsl) (DiSorbo 2018).

### Subsurface Conditions

The shallow subsurface soil (alluvium) is comprised of clay and silt with some inter-bedded sand layers. Cross sections through SWMU-1 (Figure 2A) are included as Figures 2B through 2D. Beneath the alluvium is the Petrified Forest Member of the Chinle Group, which primarily consists of interbedded mudstone, siltstone, and sandstone. The Alluvium/Chinle interface is as little as 15 ft below ground surface (bgs) to over 32 ft bgs beneath SWMU-1.

The groundwater within SWMU-1 is known to be shallow based on groundwater measurements taken in the area (Disorbo 2018, Table 2). The proposed French drains and sumps will remove the surface water and groundwater from the pond footprint to allow for sampling and, ultimately, excavation and closure. The surface water and shallow groundwater currently collects in the lagoons and pond. In addition, the installation of the French drain will prevent groundwater infiltration into SWMU-1 in the future to prevent re-impacting the area. The groundwater in the French drains will collect into sumps and will be transported and treated at the wastewater treatment facility.

## Scope of Activities

The site sampling and investigative activities of SWMU-1 will be completed to supplement and confirm data that has previously been collected at the ponds. Pending NMED approval, MPC anticipates sampling to occur in October-November 2019.



The sediment sampling will be completed per the RCRA Post-Closure Permit Section IV.J.2.d.ii. Soil borings will be completed with a hand-auger and discrete samples will be collected in order to fill data gaps from historical sampling and to create a better understanding of underlying soil impacts.

Analytical results will be screened by comparison to NMED Industrial SSLs, Toxicity Characteristic Levels, and the chosen disposal facility's waste acceptance criteria (WAC). Soil recovered during sampling will be placed in roll-off boxes within the area of SWMU-1 and characterized prior to disposal.

Once characterization has been completed, MPC will prepare an investigation report with results from the sampling. A risk assessment will be included with the investigation report. Following the investigation report a closure plan will be submitted to NMED.

## Investigation Methods

The proposed sampling locations are shown on Figure 3. The proposed locations include three samples from each of the aeration lagoons and four from the evaporation pond. MPC also plans to collect 12 additional sidewall samples along the SWMU-1 berm (4 from each area).

Soil samples will be collected by hand-augering within SWMU-1 and along the perimeter sidewalls (Figure 3). Discrete sediment samples will be collected at 2.5-ft intervals from the surface until visual and/or instrumental contamination is no longer evident, or until a maximum depth of approximately 8 feet is reached. Sediments obtained will be visually inspected and classified in general accordance with ASTM D2487 (Unified Soil Classification System) and D2488 (Description and Identification of Soils). Detailed boring logs will be completed in the field by qualified field staff. Samples will be field screened for evidence of contaminants and will be recorded in the boring logs. Field screening will include taking discrete grab samples as described below and using a Flame Ionization Detector (FID) to measure hydrocarbon vapors.

Quality assurance/quality control (QA/QC) samples will be collected during sampling to monitor the validity of the sample collection procedures. Field duplicates will be collected at a rate of ten percent of all samples collected. Equipment blanks will be collected based on ten percent of the re-usable equipment; if disposable sampling equipment is used, the blanks shall be collected at a frequency of one per day. Field blank samples will also be collected once a day. The field duplicate and blank samples will be submitted to the laboratory along with the sediment samples.





## Sample Collection Procedures

Samples will be collected in accordance with the confirmation sampling Standard Operating Procedure (SOP) (Appendix A). Details related to sample collection will be documented on the confirmation sampling field forms. General observations to be recorded on the field forms for each soil sample location will include sampling start and end times, weather, site conditions, sampling team members, and other affiliations present. Sample-specific information will include field sample identification, time of sample collection, sample start and end depth, collection method, sample type (i.e., composite or aliquot), soil classification and characteristics, any deviations or clarification of sampling procedures, and other observations. Field techniques will be applied consistently across SWMU-1 by a team of dedicated sampling personnel who may be assisted by site supervisors. A summary of the sampling activities is shown below:

1. Installation of 10 hand-augered borings in the pond sediments to determine depth of sediments and volume for disposal in the approximate locations shown in Figure 3. Both sediment and soil samples will be collected from the borings.
2. Collection of 10 sediment and 12 berm sludge/soil samples for laboratory analysis in the locations shown in Figure 3. Subject to WAC at the waste disposal facility, laboratory analyses will consist of:
  - pH
  - Metals, Method 6010
  - SVOCs, Method 8270
  - VOCs, Method 8260
  - TCLP (lead and mercury)
  - TPH GRO and DRO
  - Density
  - Paint Filter Test
  - Photoionization Detector (PID) – Headspace sampling



3. Analytical data will be screened by comparison with NMED Industrial SSLs, Toxicity Characteristic levels, and the proposed disposal facility WACs.

Equipment will be decontaminated before collecting each sample, and equipment decontamination will be noted on the field forms. Upon collection, samples will be placed into a clean, sealable plastic bag labeled with the field sample identification. Sample jars will be filled, labeled, and placed in a cooler. Before shipment, coolers will be packed with additional ice and one temperature blank per cooler. A chain of custody (CoC) form will accompany each sample shipment. Coolers will be sealed and shipped overnight to Hall Environmental Analytical Laboratory in Albuquerque, NM.

### **Sample Collection Frequency**

Sediment sample collections will be taken in accordance with the RCRA Post-Closure Permit Section IV.J.2.d.ii (Soil and Rock Sampling) and will include the following applicable intervals and depths:

- at the surface of the proposed boring locations;
- at 2.5-ft intervals;
- at the maximum depth of each boring; and
- at intervals suspected of being source or contaminated zones.

### **Data Quality and Validation**

QA/QC samples will be recorded on the field forms and CoCs. All data will be subjected to Tier II data validation to evaluate data validity.

### **Data Evaluation**

Analytical results will be screened by comparison to NMED Industrial SSLs, Toxicity Characteristic Levels, and the chosen disposal facility's WAC. Soil recovered during sampling will be placed in roll-off boxes within the area of SWMU-1 and characterized prior to disposal.



## Monitoring and Sampling Program

No groundwater, ambient air, subsurface vapor, remediation system, engineering controls, or other monitoring and sampling programs are currently being implemented at SWMU-1. A routine sampling program may be developed following excavation of the ponds if clean closure is not obtained.

## Schedule

Pending NMED approval, MPC anticipates sampling to occur in October-November 2019 following the installation of the French drain and sumps in October 2019. Following the completion of sampling activities a Closure Plan will be submitted to NMED for review and approval.

## References

DiSorbo. 2018. Investigation Work Plan Solid Waste Management Unit (SWMU) No. 1 Aeration Basin and SWMU No. 14 Old API Separator. Gallup Refinery, Western Refining Southwest, Inc., Gallup, New Mexico, November.

Trihydro. 2008. Aeration Lagoons 1 and 2 and Evaporation Pond 1 Sediment Investigation Western Refining Company, Gallup Refinery, Gallup, New Mexico, June.

Figures



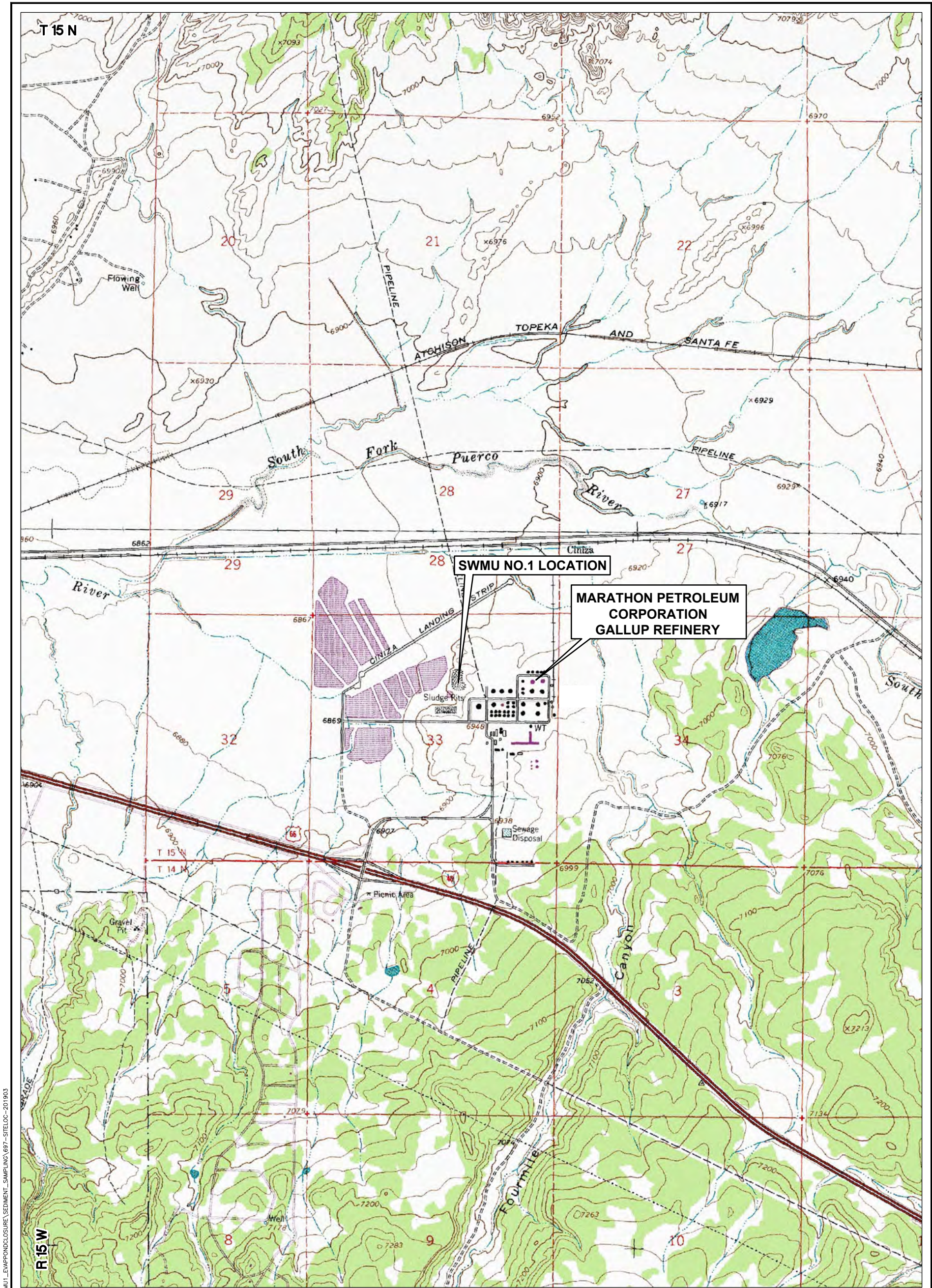


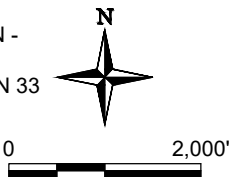
Image Cite: U.S. Geological Survey, 1:24,000-Scale 7.5 Minute Digital Raster Graphic Quadrangle, McKinley County, Publication: 2004

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QUADRANGLE LOCATION

**NOTE:**  
SITE LEGAL DESCRIPTION -  
TOWNSHIP 15 NORTH,  
RANGE 15 WEST, SECTION 33





**Trihydro**  
CORPORATION

1252 Commerce Drive  
Laramie, Wyoming 82070  
www.trihydro.com  
(P) 307/745.7474 (F) 307/745.7729

FIGURE 1

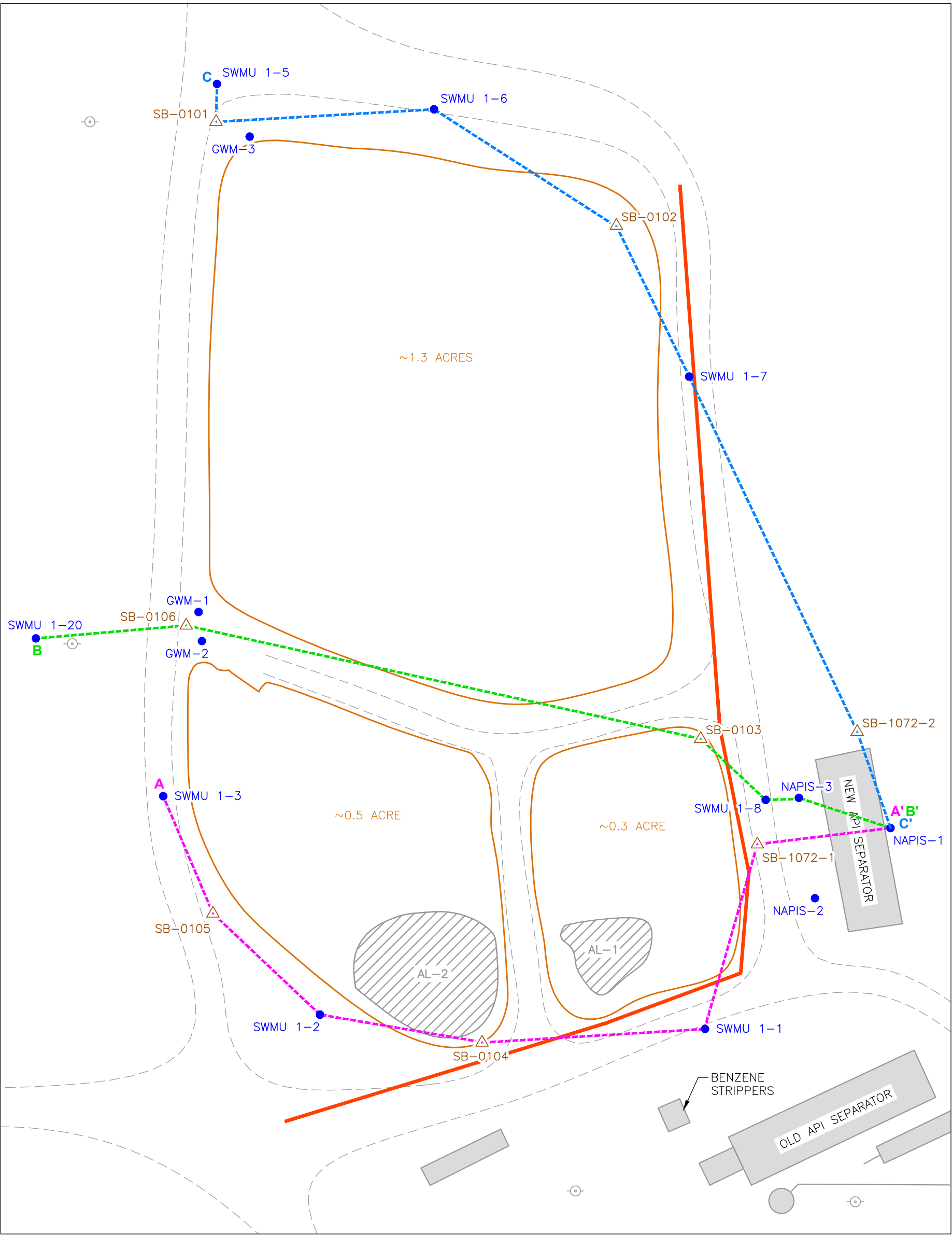
REFINERY AND SWMU NO.1 LOCATION

**MARATHON PETROLEUM CORP.**  
**GALLUP REFINING DIVISION**  
**GALLUP, NEW MEXICO**

Drawn By: REP    Checked By: JP    Scale: 1" = 2,000'    Date: 3/12/2019    File: 697-SITELOC-201903

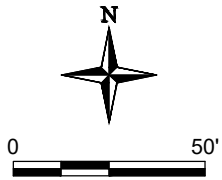


\\TRIHYDRO.COM\CLIENTS\TOM\MARATHON\CADD\GALLUP\REPORTS\SWMU1\_LEVAPPOND\CLOSURE\SEDIMENT\_SAMPLING\CROSSSECTIONS\697-SWMU1-XSECLOCs-2019

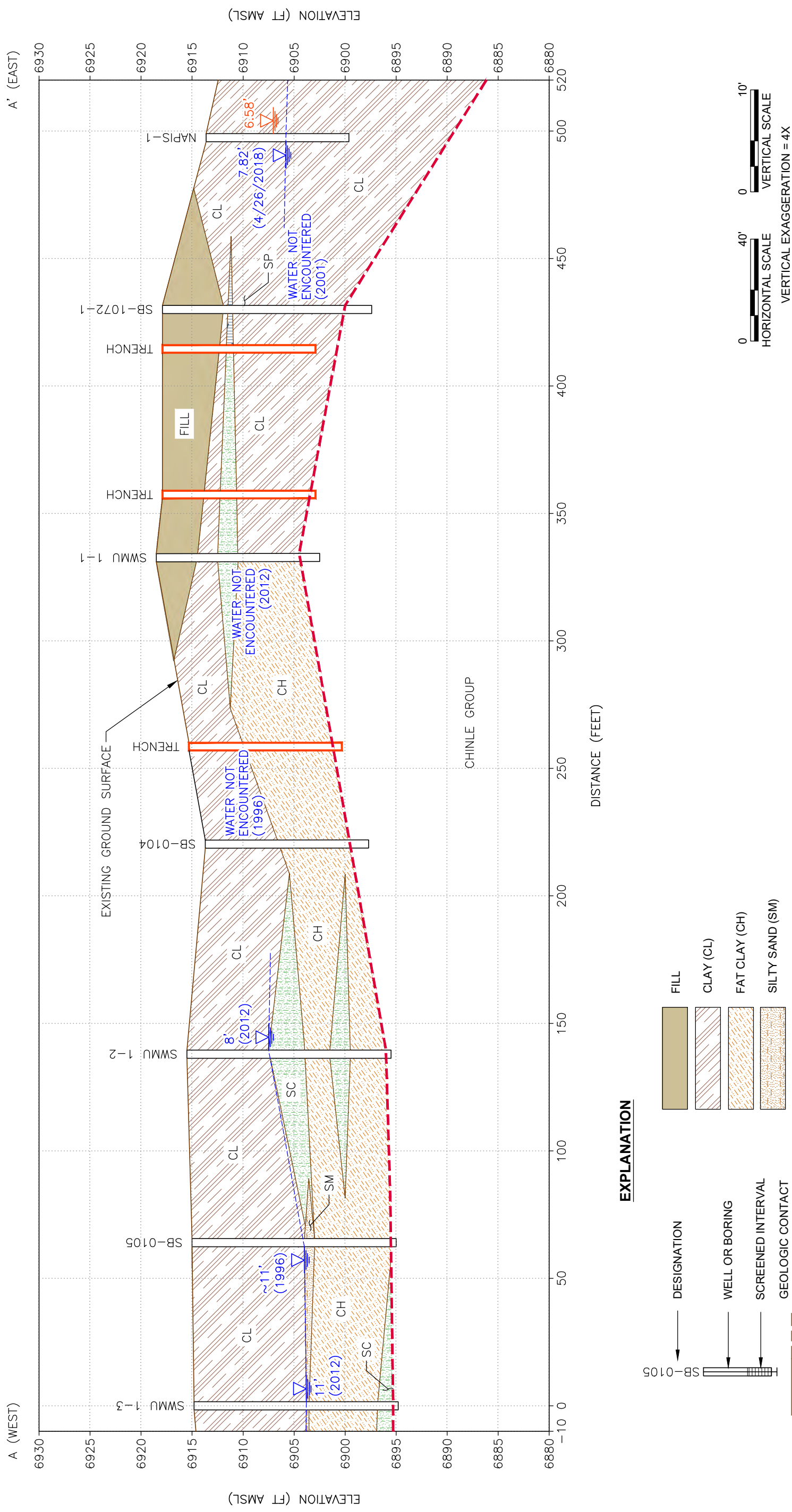


**EXPLANATION**

- NAPIS-2 GROUNDWATER WELL AND DESIGNATION
- △ SB-0104 SOIL SAMPLE AND DESIGNATION
- CROSS-SECTION A-A'
- CROSS-SECTION B-B'
- CROSS-SECTION C-C'
- ACCESS ROAD EDGE
- BANK/BERM EDGE
- PROPOSED 2019 GROUNDWATER INTERCEPTOR TRENCH
- ▨ EXTENT OF WATER/PSH (JULY 2019)
- BUILDING OR OTHER STRUCTURE
- UTILITY POLE



 <b>Trihydro</b> CORPORATION 1252 Commerce Drive Laramie, Wyoming 82070 www.trihydro.com (P) 307/745.7474 (F) 307/745.7729	<b>FIGURE 2A</b>			
	<b>CROSS-SECTION LOCATIONS MAP</b>			
	<b>MARATHON PETROLEUM CORP. GALLUP REFINING DIVISION GALLUP, NEW MEXICO</b>			
Drawn By: REP	Checked By: PH	Scale: 1" = 50'	Date: 8/19/19	File: 697-SWMU1-XSECLOCs-2019



DESIGNATION

WELL OR BORING

SCREENED INTERVAL







GEOLOGIC CONTACT  
(DASHED WHERE INFERRED)

CHINLE FM CONTACT

WATER LEVEL LINE

STATIC WATER LEVEL

PRODUCT

	FILL
	CLAY (CL)
	FAT CLAY (CH)
	SILTY SAND (SM)
	SAND, POORLY SORTED (SP)
	SANDY CLAY / CLAYEY SAND (SC)

PROPOSED 2019 GROUNDWATER INTERCEPTOR TRENCH  
FEET ABOVE MEAN SEA LEVEL

**FIGURE 2B**

## GEOLOGICAL CROSS-SECTION A-A'

**MARATHON PETROLEUM CORP.**  
**GALLUP REFINING DIVISION**  
**GALLUP, NEW MEXICO**

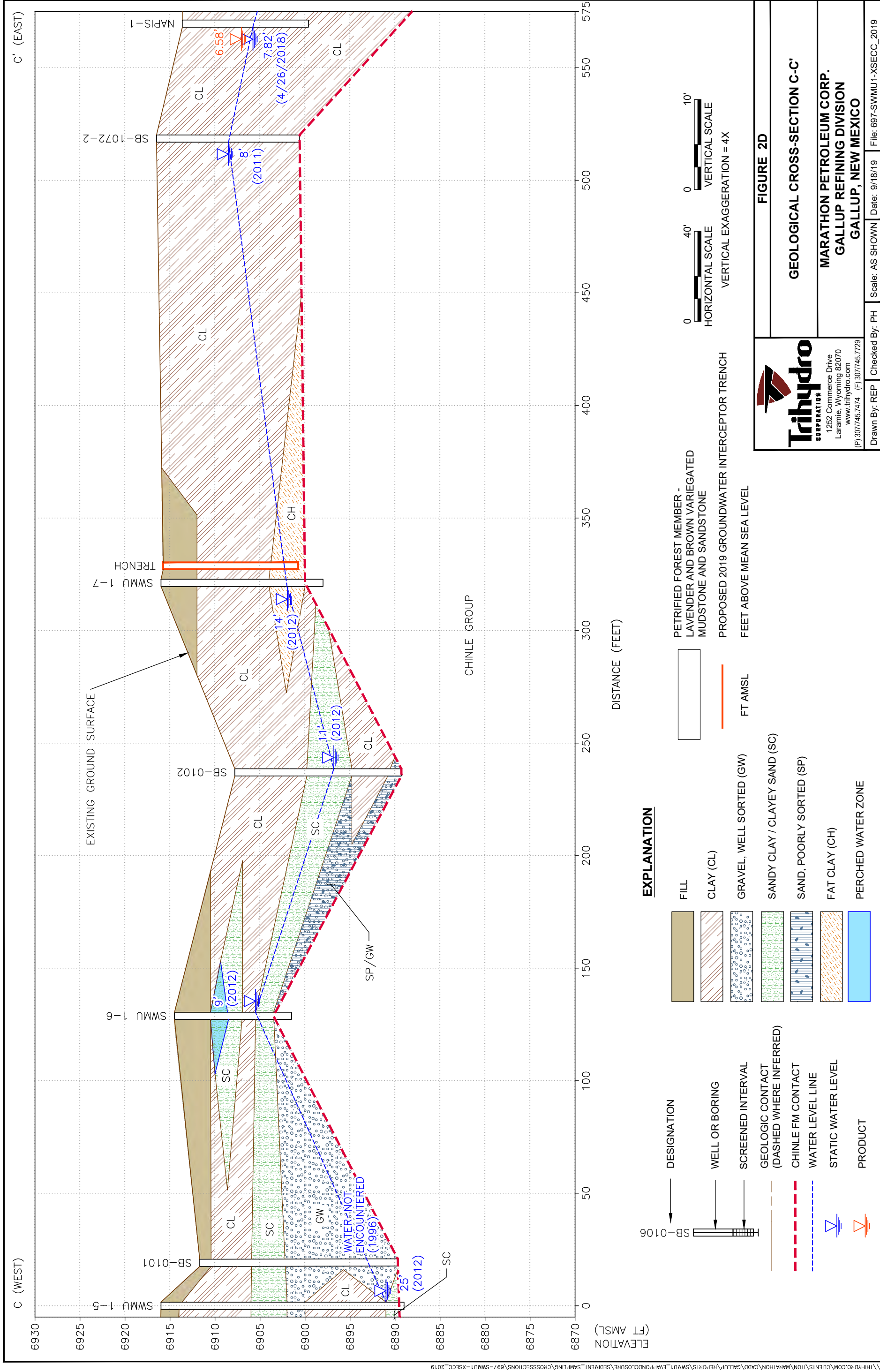
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Drawn By: REP      Checked By: PH

File: 697-SWMU1-XSECA 2019

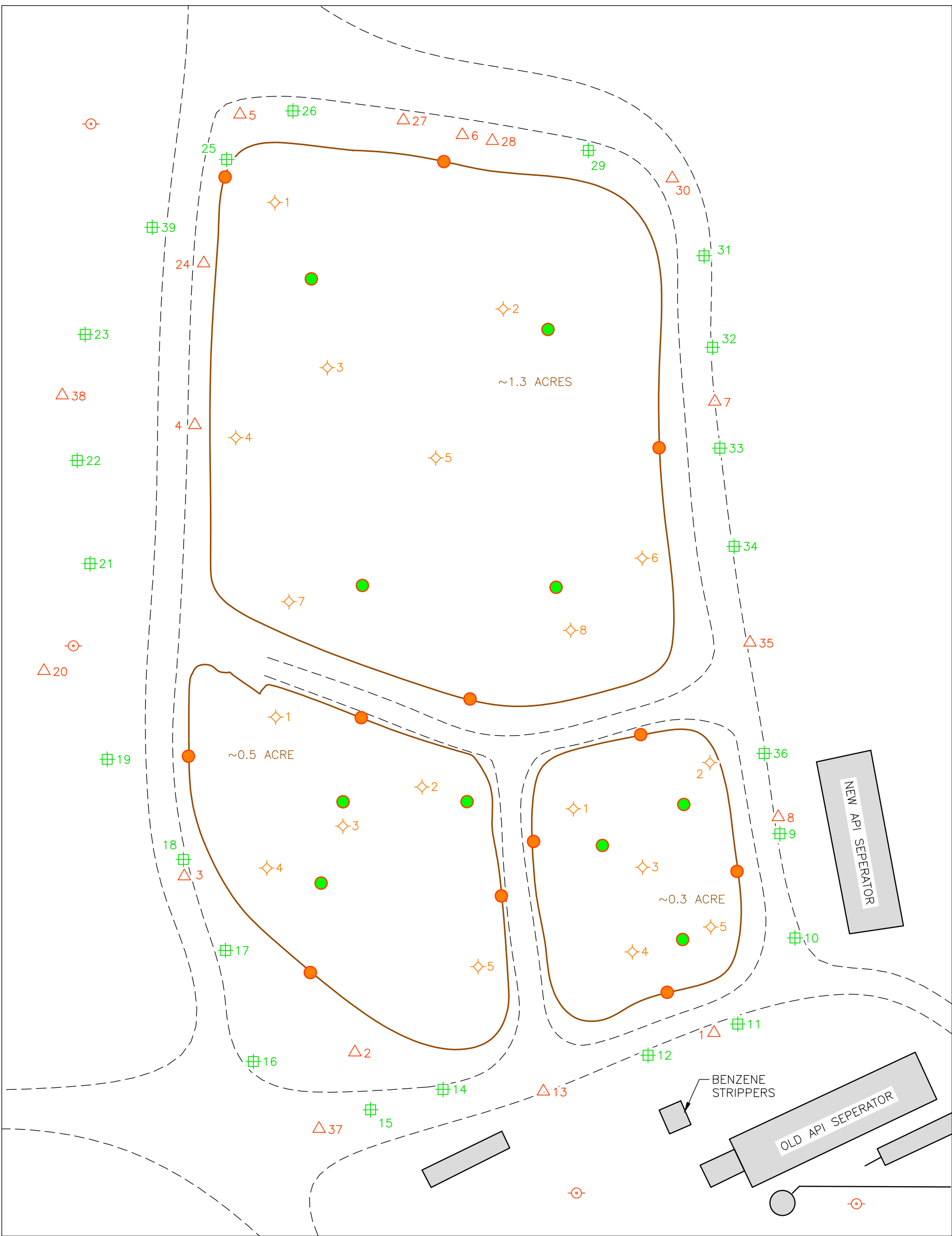
File: 697-SWMU1-XSECA 2019







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**EXPLANATION**

- ACCESS ROAD EDGE
- BANK/BERM EDGE
- △ 37 PREVIOUS PERIMETER SOIL BORING AND DESIGNATION
- 16 PREVIOUS HAND AUGER SAMPLE AND DESIGNATION
- PROPOSED 2019 POND SEDIMENT SAMPLING LOCATION
- PROPOSED 2019 BERM SAMPLING LOCATION
- ◇ 4 2008 SEDIMENT DEPTH MEASURING POINT AND DESIGNATION
- UTILITY POLE
- BUILDING OR OTHER STRUCTURE



0 50'

**FIGURE 3**

**SOIL/SEDIMENT SAMPLING LOCATIONS  
SWMU NO.1**

**MARATHON PETROLEUM CORP.  
GALLUP REFINING DIVISION  
GALLUP, NEW MEXICO**

**Trihydro**  
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Attachment



## memorandum

**To:** Sampling Team Members  
**From:** Project Manager  
**Date:** October 4, 2019  
**Re:** Standard Operating Procedure – Sediment Sampling

---

### 1.0 INTRODUCTION

Sediment sampling related to site characterization and site clean-up is expected to involve source sampling of potentially contaminated sediments for characterization and profiling. Sediment sampling is expected to occur in and around the aeration lagoons and evaporation pond.

All personnel involved in sediment sampling projects are required to review this Standard Operating Procedure (SOP) before sampling to ensure the continued generation of reliable data. This SOP is based on experience gained from collecting sediment samples and the latest information available in guidance manuals. This SOP may be updated as additional experience and information are acquired.

### 2.0 PRE-FIELD ACTIVITIES

Several activities will be conducted prior to departure for the project site. A project team will be assigned and the members will begin coordinating the sample collection event with Marathon Petroleum Company. Field equipment will be checked and organized. Access to the areas to be sampled will be checked, and provisions made to pack the necessary equipment for delivery to the project site.

### 3.0 PREPARATION

The Project Manager will review the current sampling and analysis plans and work plans to determine if any documents need to be brought to the site during monitoring. The Project Manager will also evaluate whether any changes have been made in the sampling and analytical procedures, and notify the appropriate personnel.

The Sampling Team Members will review available surface water level data before leaving for the sampling site. This preparation ensures that the proper equipment and personnel are available at the site. All field screening equipment will be inspected prior to departure, ensuring that it is in proper working order. For sediment sampling, the only field monitoring equipment used will be the Photoionization detection (PID) meter and it should be calibrated and operated according to manufacturer's recommendations.



#### **4.0 EQUIPMENT**

The following equipment is recommended for sediment sampling:

- ☐ Required personal protective equipment (PPE), listed in the site-specific health and safety plan (HASP) (generally nitrile gloves, waders, life preserver, rope and safety glasses)
- ☐ Sediment sampling devices (i.e., hand auger)
- ☐ Sampling beaker, bottles, labels, and preservatives
- ☐ Gloves
- ☐ Chain-of-custody/sample-analysis-request forms
- ☐ Flame Ionization detection meter (FID)
- ☐ Opaque Cooler(s) and bagged ice or frozen Blue Ice
- ☐ Detergent or solvent for cleaning monitoring equipment
- ☐ Brushes dedicated for decontamination
- ☐ Decontamination containers dedicated for wash, rinse 1, and rinse 2
- ☐ Paper towels
- ☐ Trash bags
- ☐ Field logbook
- ☐ Wrist watch (with digital display)

#### **5.0 SAMPLE COLLECTION**

A critical aspect of any sampling program is selection and implementation of an appropriate sampling technique. Selection of equipment and technique should be appropriate for the volume of material required and the type of analysis to be performed. In general, the sampling equipment and technique will be chosen to minimize, to the extent possible, the amount of handling a sample will undergo prior to analysis. In many cases, the material to be sampled will be easy to access, and simple "grab" samples collected using a shovel, trowel, or drive sampler are appropriate. In other cases, such as underwater or heavily saturated samples, the sediments may be difficult to access, and sampling will involve the use of specialized sediment sampling equipment. Specific analytical requirements and sampling frequencies are specified in the work plan.

Sediment samples located in dry areas will be collected from representative locations using a decontaminated drive sampler equipped with clean brass or stainless steel sampling rings, a thin-walled tube sampler or a shovel or hand trowel. The sampling device will be driven completely into the material



manually or using a manually operated auger, drive hammer, or mallet. The sampling device will then be extracted from the material using a shovel or trowel as needed. If used, filled sampling rings or the thin walled tube will then be removed from the sampling device and immediately sealed on both ends with teflon sheeting and plastic caps. Otherwise, the material will be placed directly from the trowel or other appropriate sampling device into a clean glass jar. The jar will be filled completely to minimize headspace (by tamping during filling), and immediately sealed with a teflon-lined lid.

In accordance with the work plan saturated and underwater sediment samples will be collected using a hand auger, geoprobe, sediment sampler or a similar device. Samples will be collected from the shore or boat at each preselected sampling location. Underwater samples will be capped prior to breaking the surface of the water to prevent agitation of the sample and to assist in core characterization. In addition, care will be taken to prevent mixing when collecting saturated and underwater samples. Sediment will be placed in sample containers provided by the laboratory and filled to the top to minimize headspace. If necessary, several cores may be collected from each location to provide adequate sample volume for the laboratory. The sample containers will be labeled with indelible ink. Filled sample containers should be wiped dry and placed in a cooler with ice (or equivalent) for storage at the time of collection. Enough ice and protective packing material should be used to cool the samples to 4° C and ensure that the container remains intact prior to final packing and shipment.

Field screening may involve the use of a FID probe; which will be inserted into the bag and the reading taken. All samples shall be screened at as close to the same temperature as possible to obtain consistent results.

Sampling devices will be decontaminated between sampling locations using a four-stage decontamination system consisting of a two detergent/water washes and two deionized water rinses. Sample locations will be recorded with a GPS in order to accurately map the sampling locations.

Field logbooks, Sediment Sampling Field Log, and photograph logs will provide a written record of field data gathered, field observations, field equipment calibrations, the samples collected for analysis, and sample custody. Color photographs will be used to substantiate and augment the field notes, if necessary.

# Figures



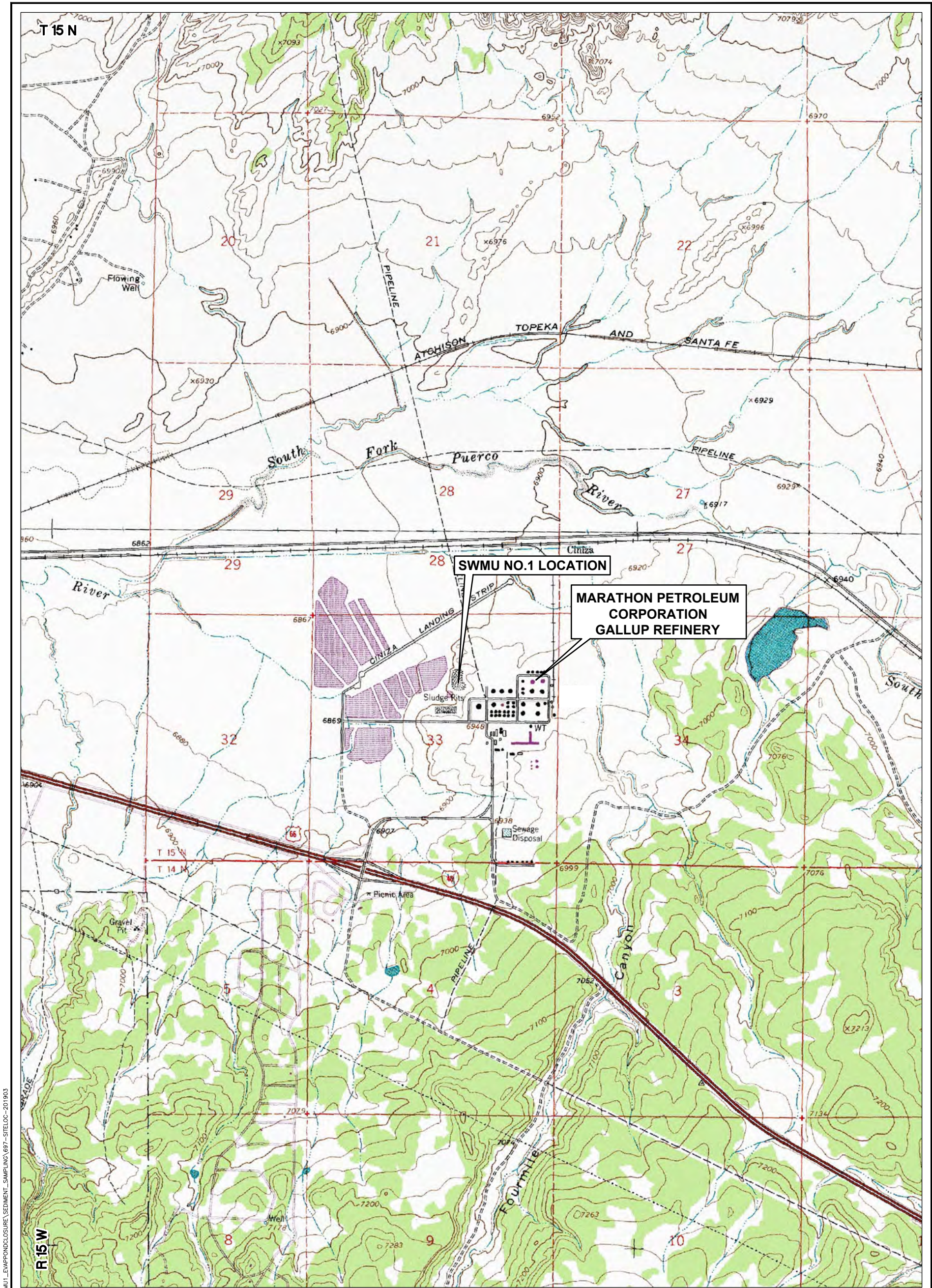


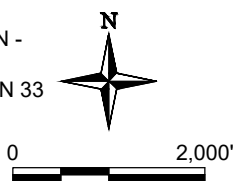
Image Cite: U.S. Geological Survey, 1:24,000-Scale 7.5 Minute Digital Raster Graphic Quadrangle, McKinley County, Publication: 2004

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QUADRANGLE LOCATION

**NOTE:**  
SITE LEGAL DESCRIPTION -  
TOWNSHIP 15 NORTH,  
RANGE 15 WEST, SECTION 33



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FIGURE 1

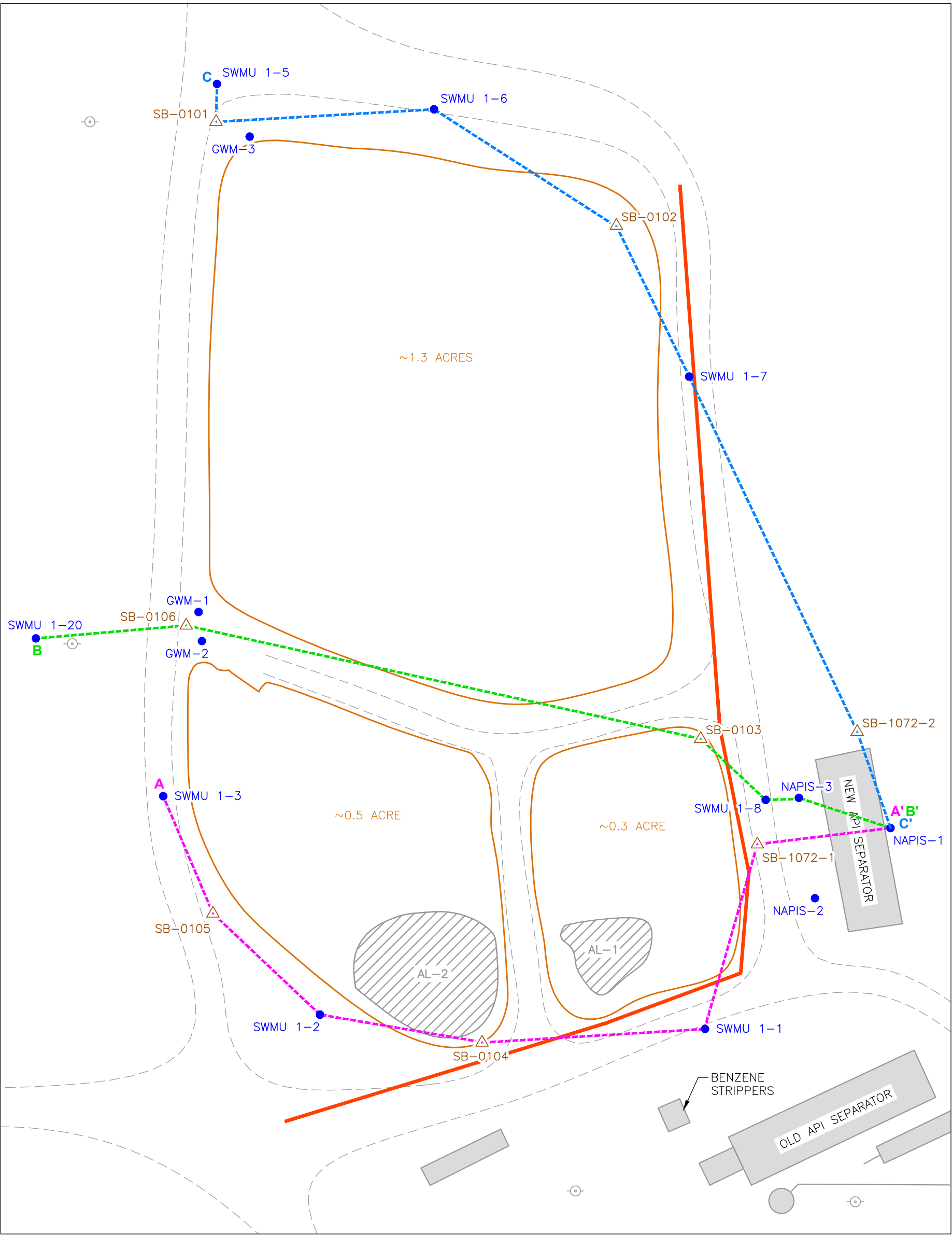
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**GALLUP, NEW MEXICO**

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**EXPLANATION**

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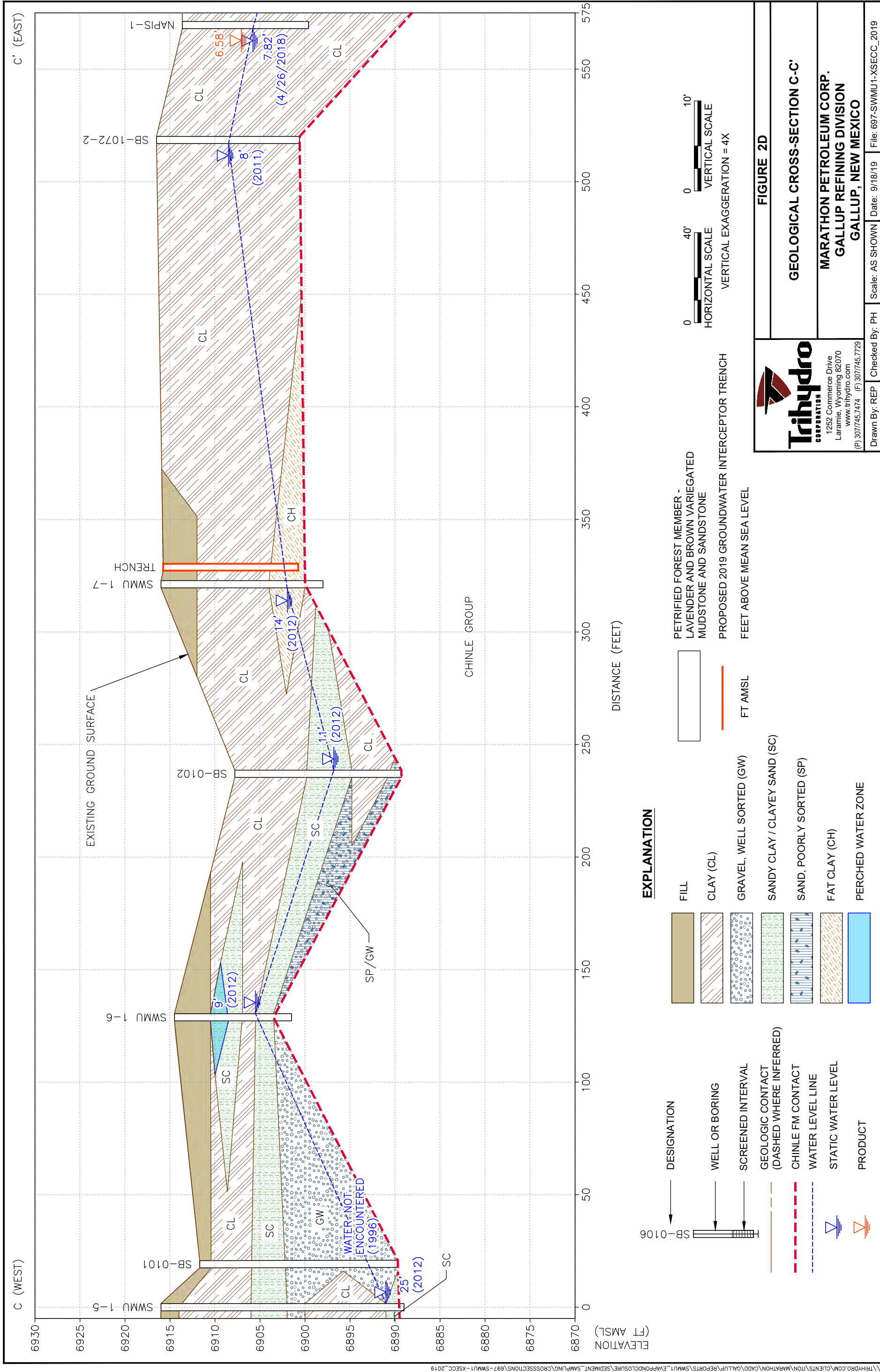
**FIGURE 2A**

**CROSS-SECTION LOCATIONS MAP**

**MARATHON PETROLEUM CORP.  
GALLUP REFINING DIVISION  
GALLUP, NEW MEXICO**

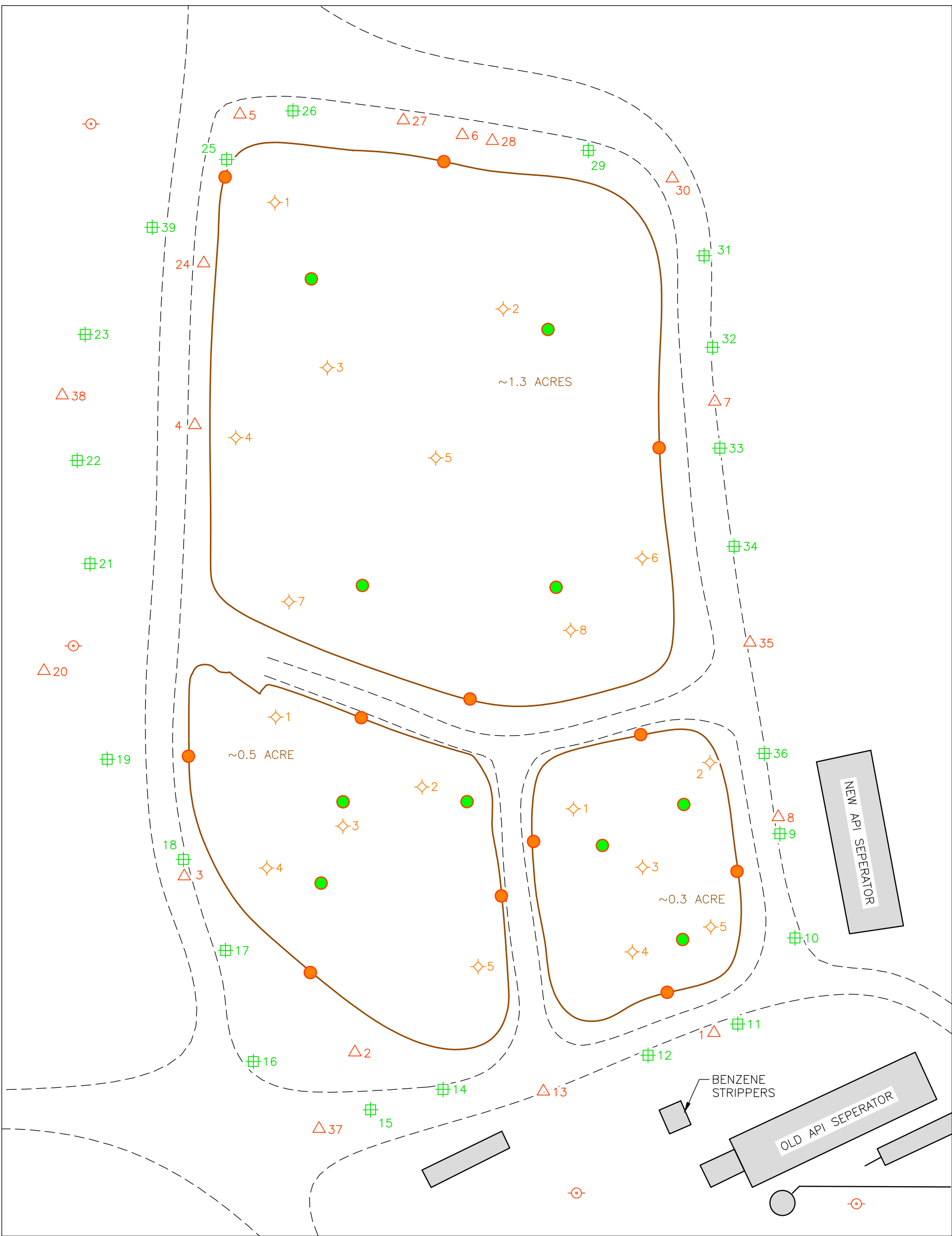








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0 50'

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Drawn By: REP | Checked By: CF | Scale: 1" = 50' | Date: 8/29/19 | File: 697-SOILSAMPGRID-201908

Attachment





## memorandum

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