



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

January 4, 2019

Scott M. Denton
Environmental Manager
HollyFrontier Navajo Refining LLC
P.O. Box 159
Artesia, New Mexico 88211-0159

**RE: APPROVAL WITH MODIFICATIONS
WELL INSTALLATION WORK PLAN FOR THE LOUDON BUILDING
(AOC 16)
HOLLYFRONTIER NAVAJO REFINING LLC – ARTESIA REFINERY
EPA ID NO. NMD048918817
HWB-NRC-18-004**

Dear Mr. Denton:

The New Mexico Environment Department (NMED) has completed its review of HollyFrontier Navajo Refining LLC, Artesia Refinery's (the Permittee) *Well Installation Work Plan for the Loudon Building (AOC 16)* (Work Plan), dated July 30, 2018. NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

Comment 1

In Section 3.2.3.1, *Near-Surface Saturated Zone*, page 16, the Permittee states, “[c]oncentrations of TDS exceeding 2,000 milligrams per liter (mg/L) and sulfate exceeding 1,00 mg/L have been recorded in monitoring wells installed upgradient (west) of the Refinery.” There is a typographical error in the statement (1,00 mg/L). Correct the error and provide a replacement page for Section 3.2.3.1.

Comment 2

In Section 5.2.2, *Soil Analytical Methods*, page 20, the Permittee states, “[t]he soil samples will be analyzed for TPH (GRO, DRO, and ORO) by Method 8015 modified, VOCs by Method

8260, RCRA 8 Metals by Methods 6010 or 6020 and 7471.” In Section 5.1, *Planned Activities*, the Permittee states that soil and groundwater samples will be collected during the well installation and submitted for the laboratory analyses of total petroleum hydrocarbon (TPH) (gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO)), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and RCRA 8 metals. There is a discrepancy in the statements. Correct the statement in Section 5.2.2 to include SVOC analysis and provide a replacement page.

Comment 3

In Section 5.2.3, *Soil Quality Assurance/Quality Control Samples*, page 20, the Permittee states, “[f]ield duplicates will be collected at a rate of 10 percent, or 1 field duplicate for every 10 soil samples.” In Section 5.2.1, *Soil Sample Collection Procedures*, the Permittee states, “[u]p to three discrete soil samples will be selected from the boring for laboratory analysis.” Although the number of samples to be collected is less than ten, one field duplicate must be collected for quality assurance. Revise the statement and provide a replacement page for Section 5.2.3.

Comment 4

In Section 5.3.4, *Groundwater Analytical Methods*, page 23, the Permittee states, “[t]he groundwater samples will be analyzed for TPH (GRO, DRO, and ORO) by Method 8015 modified, VOCs by Method 8260, RCRA 8 Metals by Methods 6010 or 6020 and 7470.” In Section 5.1, *Planned Activities*, the Permittee states that soil and groundwater samples will be collected during the well installation and submitted for the laboratory analyses of TPH (GRO, DRO, ORO), VOCs, SVOCs, and RCRA 8 metals. There is a discrepancy in the statements. Correct the statement in Section 5.3.4 to include SVOC analysis and provide a replacement page.

Comment 5

In Section 5.3.5, *Groundwater Quality Assurance/Quality Control Samples*, page 23, the Permittee states, “[f]ield duplicates will be collected at a rate of 10 percent, or 1 field duplicate for every 10 groundwater samples. Field duplicates will be analyzed for the same constituents as the parent sample.” In Section 5.3.3, *Groundwater Sample Collection Procedures*, the Permittee indicates that one groundwater or phase separated hydrocarbon (PSH) sample will be collected. Although the number of samples to be collected is less than ten, one field duplicate must be collected for quality assurance. Revise the statement and provide a replacement page for Section 5.3.5.

Comment 6

In Section 5.5.2, *Solid Wastes*, page 24, the Permittee states, “[w]aste characterization samples will be collected from the 55-gallon drums of soil cuttings and will be analyzed to determine whether the waste is hazardous by characteristic or non-hazardous.” Benzene and lead concentrations exceeded the soil-to-groundwater screening levels during the June 2017 soil investigation. Waste characterization samples must also be analyzed using the Toxicity Characteristic Leaching Procedure (TCLP) for benzene and lead, if the detected concentrations

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exceed 20 times the limit listed in 40 CFR 261.24. Revise the statement to include the analyses and provide a replacement page for Section 5.5.2.

The Permittee must address all comments in this Approval with Modifications, and submit a response letter, cross-referencing NMED's numbered comments, that includes the replacement pages required by this letter and provide an electronic version of the revised Work Plan no later than **April 26, 2019**.

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 any questions regarding this letter, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
K. Van Horn, NMED HWB
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File: Reading File and NRC 2018, HWB-NRC-18-004