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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FEB 2 1 2020

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

RE: APPROVAL WITH MODIFICATIONS
WELL INSTALLATION REPORT FOR MONITORING WELL (MW-139) IN AREA OF CONCERN 16 - LOUDON BUILDING
HOLLYFRONTIER NAVAJO REFINING LLC – ARTESIA REFINERY
EPA ID NO. NMD048918817
HWB-NRC-19-006

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 Report for Monitoring Well (MW-139) in Area of Concern 16 - Loudon Building* (Report), dated November 2019. NMED hereby issues this Approval with Modifications. The Permittee must address the attached comments.

The Permittee must address all comments in the attachment in a response letter and submit the required replacement pages and tables. The response letter, replacement pages and tables and an electronic version of the revised Report must be submitted to NMED no later than **May 29, 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 any questions regarding this letter, please contact Michiya Suzuki of my staff at (505) 476-6046.

Sincerely,

Kevin Pierard
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
M. Suzuki, NMED HWB
R. Combs, HollyFrontier
A. Sahba, HollyFrontier
L. King EPA Region 6 (6LCRRC)

File: Reading File and NRC 2020, HWB-NRC-19-006

Attachment 1

NMED Comments

Comment 1

Section 1.6 of the December 2010 RCRA Permit requires the certification of the document, signed by a responsible official for the Permittee. The certification page is missing from the Report. Provide a certification page with the required response letter.

Comment 2

In the Description of Well Installation Section, *Sample Collection Methods,* paragraph 3, page 3, the Permittee states, "[d]evelopment of the well was conducted by purging the well using a submersible pump until at least 4 of the 6 recorded water quality parameters had stabilized." Provide a table or discussion that provides the stabilization criteria in the response letter.

Comment 3

In the Data Evaluation Section, *Data Validation,* paragraph 2, page 4, the Permittee states, "[t]he DRO and ORO results in groundwater samples were qualified as not detected at the reporting limit due to the presence of both DRO and ORO in the equipment blank sample." Since the analytical instrument was contaminated, the results acquired from the DRO and ORO analyses should have been rejected, rather than qualified as not detected. Revise the Report or provide more detailed explanation for the basis of qualification in the response letter.

Comment 4

In the Data Evaluation Section, *Evaluation of Soil Sample Analytical Results,* paragraph 5, page 4, the Permittee states, "[t]he soil screening evaluation reflects that no TPH, VOCs, SVOCs, or total metals exceed the respective [Residential (Res)], [Industrial/Occupational (Ind/Occ)], [Construction Worker (CW)], or [Dilution-Attenuation factor soil screening levels (DAF 20 SSLs)]." According to NMED's *Risk Assessment Guidance for Investigations and Remediation* (Guidance), dated February 2019, the residential and industrial/construction worker soil screening levels for gasoline are listed as 100 mg/kg and 500 mg/kg, respectively. The Permittee used the soil screening levels for unknown oil to compare the site concentrations of gasoline, diesel, and oil range organics. Although it is appropriate to use soil screening levels for unknown oil to compare the site concentrations of diesel and oil range organics, much lower soil screening levels for gasoline were established in the 2019 Guidance. The site's TPH-GRO concentrations must be compared with the screening levels of gasoline indicated in the 2019 Guidance. Accordingly, the TPH-GRO concentrations in the soil samples collected at depths 15-18 feet below ground surface (bgs) exceeded the residential soil screening level for gasoline. Provide replacement pages to discuss the exceedances in the response letter. Additionally, revise all applicable tables to include the soil screening levels for gasoline and provide replacement tables.

Comment 5

In the Data Evaluation Section, *Evaluation of Groundwater Sample Analytical Results*, paragraph 3, page 5, the Permittee states, "[g]roundwater analytical results for GRO, DRO, and ORO were screened using the value for groundwater screening of TPH from an unknown oil source, provided in Table A-4 of the 2019 NMED guidance document (NMED 2019)." The groundwater screening level for unknown oil was increased from 0.0398 mg/L to 0.0858 mg/L while a much lower groundwater screening level for gasoline (0.0101 mg/L) was established in the 2019 Guidance. Provide replacement table with the groundwater screening level of 0.0101 mg/L for TPH-GRO with the response letter (see also Comment 4).

Comment 6

In the Data Evaluation Section, *Evaluation of Groundwater Sample Analytical Results*, paragraph 3, page 5, the Permittee states, "[e]ach critical groundwater screening level (CGWSL) and the source of the CGWSLs are summarized in Table 3 along with the analytical results of the groundwater samples collected from MW-139." There appears to be a typographical error with the table referenced in the statement. The correct table is Table 4 (Groundwater Analytical Results). Correct the typographical error and provide replacement page(s) with the response letter.

Comment 7

In the Conclusions and Recommendations Section, paragraph 5, page 6, the Permittee states, "[i]t is recommended that MW-139 be added to the facility-wide groundwater monitoring program to be sampled routinely." NMED concurs with the recommendation. Propose the analytical suite for well MW-139 in the next Facility-wide Groundwater Monitoring Plan update.