

UIC - I - 8 - 1

ENFORCEMENT

2015 - Present

Chavez, Carl J, EMNRD

From: Denton, Scott <Scott.Denton@HollyFrontier.com>
Sent: Wednesday, April 08, 2015 3:53 PM
To: Dawson, Scott, EMNRD; Chavez, Carl J, EMNRD
Cc: Coons, Christina (Christie); O'Brien, Robert (Bob) K.; Holder, Mike
Subject: Quarterly Selenium Results
Attachments: Rpt_1504137_Final_v1.pdf

Scott & Carl,

Attached is the laboratory report on the effluent selenium sampling conducted on April 1, 2015 and summarized below.

Total Effluent Se = 0.025 mg/L

TCLP Effluent Se = ND mg/L

Selenium sampling is conducted on a quarterly basis on the first business day of the quarter per Exhibit A Condition 1(c) to the Amended and Supplemented Order dated November 14, 2013. The next scheduled sampling date will be Wednesday, July 1, 2015. Please let me know if you have a different interpretation or if you have any questions or comments. Thanks again for your assistance in this matter.

Regards,

Scott

Scott M. Denton
Environmental Manager

The HollyFrontier Companies
P.O. Box 159
Artesia, NM 88211-0159
575-746-5487

Scott.Denton@HollyFrontier.com

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Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

April 08, 2015

Mike Holder
Navajo Refining Company
P.O. Box 159
Artesia, NM 88211-0159
TEL: (575) 748-3311
FAX

RE: Quarterly WW Effluent Monitoring

OrderNo.: 1504137

Dear Mike Holder:

Hall Environmental Analysis Laboratory received 2 sample(s) on 4/3/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order **1504137**

Date Reported: **4/8/2015**

CLIENT: Navajo Refining Company

Client Sample ID: Effluent to Wells (location #6)

Project: Quarterly WW Effluent Monitoring

Collection Date: 4/1/2015 10:30:00 AM

Lab ID: 1504137-001

Matrix: AQUEOUS

Received Date: 4/3/2015 9:22:00 AM

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed	Batch ID
EPA 6010B: TOTAL METALS							Analyst: ELS	
Selenium	0.025	0.017	0.050	J	mg/L	1	4/4/2015 11:33:27 AM	18524

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RSD is greater than RSDlimit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order **1504137**

Date Reported: **4/8/2015**

CLIENT: Navajo Refining Company

Client Sample ID: Effluent to Wells (location #6)

Project: Quarterly WW Effluent Monitoring

Collection Date: 4/1/2015 10:30:00 AM

Lab ID: 1504137-002

Matrix: AQUEOUS

Received Date: 4/3/2015 9:22:00 AM

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed	Batch ID
EPA METHOD 6010B: TCLP METALS							Analyst: ELS	
Selenium	ND	0.027	0.050		mg/L	1	4/4/2015 11:34:42 AM	18524

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RSD is greater than RSDlimit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1504137

08-Apr-15

Client: Navajo Refining Company
Project: Quarterly WW Effluent Monitoring

Sample ID	MB-18524		SampType:	MBLK		TestCode:	EPA 6010B: Total Metals				
Client ID:	PBW		Batch ID:	18524		RunNo:	25294				
Prep Date:	4/3/2015		Analysis Date:	4/4/2015		SeqNo:	747889		Units: mg/L		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Selenium	ND	0.050									

Sample ID	LCS-18524		SampType: LCS		TestCode: EPA 6010B: Total Metals					
Client ID:	LCSW		Batch ID: 18524		RunNo: 25294					
Prep Date:	4/3/2015		Analysis Date: 4/4/2015		SeqNo: 747890		Units: mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Selenium	0.50	0.050	0.5000	0	100	80	120			

Qualifiers:

* Value exceeds Maximum Contaminant Level.
E Value above quantitation range
J Analyte detected below quantitation limits
O RSD is greater than RSDlimit
R RPD outside accepted recovery limits
S Spike Recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
P Sample pH Not In Range
RL Reporting Detection Limit

Sample Log-In Check List

Client Name: NAVAJO REFINING CO

Work Order Number: 1504137

RcptNo: 1

Received by/date:

Logged By: Lindsay Mangin

4/3/2015 9:22:00 AM

Completed By: Lindsay Mangin

4/3/2015 9:51:32 AM

Reviewed By:

Chain of Custody

1. Custody seals intact on sample bottles?

Yes ☒

No ☐

Not Present ☐

2. Is Chain of Custody complete?

Yes ☒

No ☐

Not Present ☐

3. How was the sample delivered?

Courier

Log In

4. Was an attempt made to cool the samples?

Yes ☒

No ☐

NA ☐

5. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C ?

Yes ☐

No ☒

NA ☐

6. Sample(s) in proper container(s)?

Yes ☒

No ☐

Approved by client.

7. Sufficient sample volume for indicated test(s)?

Yes ☒

No ☐

8. Are samples (except VOA and ONG) properly preserved?

Yes ☒

No ☐

9. Was preservative added to bottles?

Yes ☐

No ☒

NA ☐

10. VOA vials have zero headspace?

Yes ☐

No ☐

No VOA Vials ☒

11. Were any sample containers received broken?

Yes ☐

No ☒

12. Does paperwork match bottle labels?

(Note discrepancies on chain of custody)

Yes ☒

No ☐

13. Are matrices correctly identified on Chain of Custody?

Yes ☒

No ☐

14. Is it clear what analyses were requested?

Yes ☒

No ☐

15. Were all holding times able to be met?

(If no, notify customer for authorization.)

Yes ☒

No ☐

of preserved
bottles checked
for pH:

1
(<2 or >12 unless noted)

Adjusted? no

Checked by: CS

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order?

Yes ☐

No ☐

NA ☒

Person Notified:

Date:

By Whom:

Via:

☐

eMail

☐

Phone

☐

Fax

☐

In Person

Regarding:

Client Instructions:

17. Additional remarks:

18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	14.9	Good	Yes			

Chain-of-Custody Record

Client: Navajo Refining Co.

Mailing Address: P.O. Box 159 Artesia,

NM 88211-0159

Phone #: 575-748-3311

email or Fax#: 575-748-5451

QA/QC Package:

☐ Standard ☐ Level 4 (Full Validation)

☐ Other

☐ EDD (Type) _____

Date Time Matrix Sample Request ID

4-1-15 10:30 Liquid Effluent to Wells (location #6)

4-1-15 10:30 Liquid Effluent to Wells (location #6)

Turn-Around Time:

☐ Stande ☐ Rush Next Day

Project Name:

Quarterly VW Effluent Monitoring

Project #: P.O. # 167796

Project Manager:

Mike Holder / Dan Crawford

Sampler:

On Ice: ☒ Yes ☐ No

Sample Temperature: 14.9

Container

Type and

#

Preservative

Type

HEAL No

1504137

-001

-002-

1 Plastic HNO3

1 Plastic Neat

Total Se by EPA Method 6010B
TCLP Selenium 1311/6010

HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Remarks: Required to test on the first business day of each month.

(1) Totals method 6010

(2) TCLP 1311/6010

Received by: *[Signature]* Date Time

04/03/15 0922

Received by: *[Signature]* Date Time

04/03/15 0922

Relinquished by: *[Signature]* James Batts

Time: 11:50

Relinquished by: *[Signature]*

Time: 11:50

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly noted on the analytical report.

Chavez, Carl J, EMNRD

From: Coons, Christina (Christie) <Christina.Coons@HollyFrontier.com>
Sent: Monday, February 02, 2015 4:24 PM
To: Dawson, Scott, EMNRD; Chavez, Carl J, EMNRD
Cc: Holder, Mike; Stone, Brian
Subject: Quarterly Progress Report
Attachments: OCD Order Oct-Nov-Dec 2014 Quarterly Progress Report.pdf

Scott & Carl,

Please find attached a copy of the quarterly report required by Condition 9 of Exhibit A of the Amended and Supplemental Agreed Order between Navajo Refining Company (NRC) & OCD (Dated November 14, 2013). The original hardcopy is going out today via certified mail. Please don't hesitate to call me with any questions and thanks for your assistance in this matter.

Thanks,

Christie Coons

Environmental Administrative Assistant
Navajo Refining Company, LLC
P.O. Box 159
Artesia, NM 88211-0159
Desk 575-746-5488
Cell 575-616-1801
Main 575-748-3311

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February 2, 2015

Mr. Scott Dawson
Mr. Carl Chavez
Oil Conservation Division
New Mexico Energy, Minerals & Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505
Re: ACOW-6

Certified Mail/Return Receipt
7014 1200 0000 1832 3488

RE: Navajo Refining Company, L.L.C. / Artesia Refinery
Fourth Quarter 2014 Quarterly Interim Progress Report
OCD Order No. WQA-OCD-CO-2013-001

Dear Sirs:

This quarterly progress report is submitted pursuant to Paragraph 9 of Exhibit A to the Amended and Supplemental Agreed Compliance Order No. WQA-OCD-CO-2013-001, dated November 15, 2013 (the "Order"). Specifically, Paragraph 9 requires that Navajo provide to the Oil Conservation Division (OCD) a quarterly interim progress report detailing the status and timeline for actions taken by Navajo during the preceding quarter under the Order. The quarterly progress report shall be due the first business day of the second month following the end of the quarter and shall include the following:

- a) A summary of all the results of sampling required pursuant to Paragraph 1 of Exhibit A to the Order, and copies of all supporting laboratory data;
- b) A summary of the results of any optional sampling taken during the preceding calendar month (copies of laboratory data for such optional sampling shall be provided to OCD upon request); and
- c) The calculation of stipulated penalties required under Section III, Paragraph 2 of the Order.

This is the Fourth Quarter 2014 progress report, detailing the actions taken during the preceding calendar quarter comprised of October 2014, November 2014, and December 2014, and due on the first business day of the second month following the end of the quarter (i.e., February 2, 2015). This report also includes the final analytical results as of January 19, 2015, and the actions taken through approximately January 19, 2015. Progress report submittal frequency has been altered from monthly to quarterly following submission of the November 2014 monthly report per the Third Amendment to the Agreed Compliance Order WQA-OCD-CO-2013-001, dated November 19, 2014, except as otherwise provided at Paragraph 9 of Amended Exhibit A. The next progress report will be submitted by May 1, 2015, addressing actions taken during first quarter 2015.

Status and Timeline for Actions Taken by Navajo

Since October 15, 2013, when Navajo refinery identified a potential violation of the toxicity characteristic leaching procedure (TCLP) selenium limit of 1 milligram per liter (mg/L) (the "Se Limit"), it has provided prompt notifications to the OCD via telephone and submission of C-141

Navajo Refining Company, L.L.C.
501 East Main • Artesia, NM 88210
(575) 748-3311 • <http://www.hollyfrontier.com>

Forms, with a copy to the New Mexico Environment Department's (NMED) Hazardous Waste Bureau. A list of these notifications for each potential selenium measurement above the Se Limit is provided in Table 1. To date, Navajo has also complied with the reporting requirements of the Order, including submission of the results of required sampling within three (3) business days of receipt of final data and submittal of various reports (except as otherwise referenced at footnote 1, below), as follows:¹

- The interim progress report was submitted on November 21, 2013 pursuant to Paragraph 10 of Exhibit A to the Order;
- The November 2013 progress report was submitted on December 2, 2013 pursuant to Paragraph 9;
- The review of selenium sampling data report was submitted on December 4, 2013 pursuant to Paragraph 11;
- The summary of technical evaluation for short-term remedy selection report was submitted on December 13, 2013 pursuant to Paragraph 12;
- The December 2013 progress report was submitted on January 2, 2014 pursuant to Paragraph 9;
- The January 2014 progress report was submitted on February 3, 2014 pursuant to Paragraph 9;
- The February 2014 progress report was submitted on March 3, 2014 pursuant to Paragraph 9;
- The March 2014 progress report was submitted on April 1, 2014 pursuant to Paragraph 9;
- The April 2014 progress report was submitted on May 1, 2014 pursuant to Paragraph 9;
- The May 2014 progress report was submitted on June 2, 2014 pursuant to Paragraph 9;
- The June 2014 progress report was submitted on July 1, 2014 pursuant to Paragraph 9;
- The July 2014 progress report was submitted on August 1, 2014 pursuant to Paragraph 9;
- The August 2014 progress report was submitted on September 2, 2014 pursuant to Paragraph 9;
- The notice of compliance with Se Limit was submitted on September 15, 2014 pursuant to Paragraph 13;
- The notice of selection of long-term option for addressing selenium concentrations in wastewater was submitted on September 30, 2014 pursuant to Paragraph 15;
- The September 2014 progress report was submitted on October 1, 2014 pursuant to Paragraph 9;
- The October 2014 progress report was submitted on November 3, 2014 pursuant to Paragraph 9;
- The November 2014 progress report was submitted on December 1, 2014 pursuant to Paragraph 9.

¹ See Letter from Dan Crawford, P.G., Environmental Manager, Navajo, to Director, OCD, August 21, 2014, and Letter from Michael G. McKee, Vice President and Refinery Manager, Navajo, to Director, OCD, November 19, 2014 (regarding stipulated penalty payments for a small number of missed deadlines).

Table 1: Summary of Potential Selenium Violation Notifications made to the OCD

Sample Date	Selenium Concentration (mg/L)		Verbal Notification to OCD	Form C-141 Submittal Date
	TCLP Selenium	Total Selenium		
September 27, 2013	1.24	1.6	October 15, 2013	October 21, 2013
October 15, 2013	1.24	1.49	October 20, 2013	October 21, 2013
October 31, 2013	1.23	0.996	November 5, 2013	November 11, 2013
November 1, 2013 ¹	1.13	0.974	November 6, 2013	November 13, 2013
November 4, 2013	1.1	0.98	November 6, 2013	November 13, 2013
November 5, 2013	1.2	0.51	November 7, 2013	November 14, 2013

¹ As explained in Navajo's C-141 report, the corresponding discharge for this sampling event occurred on November 2, 2013.

In response to these selenium results, the Artesia Refinery took immediate action to reduce the amount of selenium in the discharge. These actions included evaluating the Refinery's process and operations, implementing an extensive selenium sampling program, temporarily reducing production rates, temporarily changing the crude slate, shutting down units to evaluate their impacts on selenium levels, and adding reverse osmosis (RO) reject wastewater upstream of the wastewater treatment system, which are described in earlier progress reports. Navajo has also aggressively pursued short-term selenium control strategies which are detailed in its report of December 13, 2013 summarizing the technical evaluation for short-term remedy selection. As described in Navajo's September 30, 2014 notice to OCD, Navajo has also now selected use of the existing 100 gpm SeRT® unit, without modification, as its long-term option for reducing selenium concentrations in wastewater. (Other long-term options that had been under consideration included the potential design and installation of a 200 gpm SeRT® unit and the modification of the existing 100 gpm SeRT® unit). An updated timeline of the activities to support these solutions is provided below.

October 30-31, 2013

- Met in Artesia to kick off process engineering by CH2M HILL for selenium reduction via SeRT® (Selenium Removal Technology) process and other WWTP upgrades.
- Negotiated an expedited project schedule with CH2M HILL to design and build a 200 gpm SeRT® Unit within 6 to 8 months.
- Reviewed feasibility of implementing Iron Co-precipitation of selenite via ferric chloride addition as a possible short-term selenium reduction technology.

November 5, 2013

- Met with Phillips 66 in California to kick off license and technology agreement for SeRT® process.

November 7, 2013

- Inquired with Valero about potential purchase of an idle 100 gpm SeRT® unit. (Relocation of this existing unit was at that time expected to put a portion of the long-term selenium removal technology in place within an estimated 3 to 4 months. As explained in Navajo's September 30, 2014 notice, Navajo has now selected the 100 gpm SeRT® unit as its long-term option for reducing selenium concentrations in wastewater.)

November 12, 2013

- Reached agreement for purchase of the idle SeRT® equipment from the Valero Wilmington Refinery.
- Hired a relocation contractor to mark the unit for removal.

November 14, 2013

- Made arrangements to test the feasibility of ferric chloride injection to reduce selenium in wastewater effluent, with the performance of parallel testing onsite at the Refinery and at the CH2M HILL laboratory.

November 18, 2013

- Oversaw dismantling of idle SeRT® Unit at the Valero refinery.
- Scheduled to begin moving SeRT® equipment by December 2, 2013.
- Sited tie-ins and existing piping and equipment at the Navajo Refinery for use in both short- and long-term SeRT® installations.
- Confirmed via jar tests that ferric chloride injection will precipitate selenite from water and, therefore, is anticipated to result in a significant reduction in selenium TCLP levels in the Refinery's discharge at the injection wells.

November 19-22, 2013

- Completed engineering for ferric chloride injection; relevant equipment and ferric chloride ordered.

November 21, 2013

- Agreed to licensing terms with Phillips 66 on use of SeRT® technology.

November 26, 2013

- Completed installation of the equipment necessary to conduct a full-scale trial of the Iron Co-precipitation process.

November 27, 2013

- Commenced full-scale trial of Iron Co-precipitation process at a dose of 100 mg/L of ferric chloride.

November 29, 2013

- Halted the full-scale trial of Iron Co-precipitation process due to restriction in wastewater flow through the Walnut Shell Filter unit located downstream of the DAF.

December 2, 2013

- Installed foundations for the 100 gpm SeRT® unit.

December 4, 2013

- Obtained interim OCD approval under Paragraph 13 of Exhibit A to the Order for the use of Iron Co-precipitation and SeRT® as remedies.

- Prepared new bench-scale test plan to provide operating guidelines for Iron Co-precipitation chemical dosing rates.
- Refinery began processing Western Canadian Select (WCS) crude again.

December 5, 2013

- Commenced extensive additional jar testing for the Iron Co-Precipitation process. The goal was to test various combinations of dosages of ferric chloride and two substances that are part of normal operation of the DAF – a coagulant and flocculent.

December 6, 2013

- Restarted full-scale Iron Co-Precipitation trial with a reduced ferric chloride dose of 20 mg/L to examine impacts on the Walnut Shell Filter.

December 9, 2013

- Equipment components for the 100 gpm trial SeRT® unit began to arrive.

December 16, 2013

- Increased ferric chloride dose for full-scale Iron Co-Precipitation trial from 20 mg/L to 50 mg/L.
- Obtained OCD approval under Paragraph 13 of Exhibit A to the Order for the use of Iron Co-precipitation and SeRT® as remedies, subject to the submittal of dates for milestones and deadlines.

December 27, 2013

- Started biweekly sample collection at various locations in the trial Iron Co-Precipitation process.

January 4, 2014

- Restarted Hydrocracker Unit.

January 17, 2014

- Mechanical completion of the 100 gpm trial SeRT® unit.

January 20, 2014

- Commissioning of the 100 gpm trial SeRT® unit.

January 30, 2014

- Refinery resumed normal production rate.

February 1, 2014

- Started 100 gpm trial SeRT® unit.
- Completed sample collection for Iron Co-Precipitation trial and converted Iron Co-Precipitation trial to continuous, full-scale operation. The trial results are summarized in Table 2 below and show an average total selenium removal efficiency of 73%.

Table 2: Selenium Measurements Collected During the Iron Co-Precipitation Trial (mg/L)

DATE	Laboratory	T-805 Eff.		DAF Eff.		Walnut Filter Eff.		Tank 809 Eff.		Removal Efficiency on Total Se
		Total Se	TCLP Se	Total Se	TCLP Se	Total Se	TCLP Se	Total Se	TCLP Se	
12/27/2013	Hall Environmental	1.1	0.30	0.38	0.30	0.37	0.31	0.38	0.34	66%
12/30/2013	Hall Environmental	1.6	0.37	0.63	0.35	0.43	0.34	-	-	73%
1/6/2014	Hall Environmental	1.2	0.17	0.34	0.18	0.27	0.20	-	-	78%
1/9/2014	Hall Environmental	1.8	0.14	0.42	0.21	0.43	0.25	-	-	76%
1/13/2014	Hall Environmental	2.1	0.34	0.41	0.33	0.37	0.35	-	-	82%
1/16/2014	Hall Environmental	1.6	0.18	0.25	0.22	0.20	0.20	-	-	88%
1/20/2014	Hall Environmental	1.0	0.55	0.75	0.57	0.54	0.55	-	-	46%
1/23/2014	Hall Environmental	1.4	0.18	0.24	0.19	0.21	0.20	-	-	85%
1/27/2014	Hall Environmental	1.2	0.43	0.55	0.58	0.51	0.51	-	-	58%
1/30/2014	Hall Environmental	1.0	0.26	0.30	0.27	0.23	0.29	-	-	77%

February 13, 2014

- Completed process engineering of full capacity permanent SeRT® unit.

March 20, 2014

- Achieved stable operation of 100 gpm trial SeRT unit.

March 31, 2014

- Confirmed that selenium reduction is being achieved by the 100 gpm trial SeRT® unit. The results through January 19, 2015 are summarized in Table 3 below and show an average total selenium removal efficiency of 94.2%. On September 30, 2014, this unit was selected as Navajo's long-term option for reducing selenium concentrations in wastewater, as explained in Navajo's notice to OCD of that same date.

Table 3: Selenium Measurements Collected During the 100 gpm Trial SeRT® Unit

DATE	Laboratory	Flow to SeRT	SeRT Influent		SeRT Effluent		Removal Efficiency
		-	Total Se	TCLP Se	Total Se	TCLP Se	On Total Se
		(gpm)	(ppm)	(ppm)	(ppm)	(ppm)	-
2/10/2014	Hall Environmental	75	5.20	-	0.31	-	94%
2/12/2014	Hall Environmental	85	6.50	-	0.60	-	91%
2/13/2014	Hall Environmental	85	6.00	6.50	0.81	0.83	87%
2/17/2014	Hall Environmental	100	6.60	8.30	1.20	1.70	82%
2/19/2014	Hall Environmental	85	7.20	7.50	1.20	1.30	83%

		Flow to SeRT	SeRT Influent		SeRT Effluent		Removal Efficiency
		-	Total Se	TCLP Se	Total Se	TCLP Se	On Total Se
DATE	Laboratory	(gpm)	(ppm)	(ppm)	(ppm)	(ppm)	-
2/20/2014	Hall Environmental	98	7.00	7.50	1.40	1.70	80%
2/24/2014	Hall Environmental	102	7.00	6.90	1.50	1.70	79%
2/26/2014	Hall Environmental	102	6.60	5.70	1.50	1.40	77%
2/27/2014	Hall Environmental	104	5.80	6.20	0.46	0.50	92%
3/3/2014	Hall Environmental	104	5.60	5.60	0.49	0.57	91%
3/5/2014	Hall Environmental	106	5.70	5.40	0.56	0.61	90%
3/6/2014	Hall Environmental	115	5.40	5.40	0.44	0.52	92%
3/10/2014	Hall Environmental	115	5.30	5.70	0.19	0.23	96%
3/12/2014	Hall Environmental	113	5.20	5.10	0.21	0.23	96%
3/13/2014	Hall Environmental	115	5.00	5.30	0.14	0.16	97%
3/17/2014	Hall Environmental	120	4.40	4.80	0.14	0.19	97%
3/19/2014	Hall Environmental	110	3.90	4.30	0.17	0.20	96%
3/20/2014	Hall Environmental	84	4.40	4.80	0.11	0.11	98%
3/24/2014	Hall Environmental	100	4.70	5.40	0.22	0.28	95%
3/27/2014	Hall Environmental	94	3.90	-	0.12	-	97%
3/31/2014	Hall Environmental	112	4.40	-	0.15	-	97%
4/3/2014	Hall Environmental	125	3.60	-	0.12	-	97%
4/7/2014	Hall Environmental	110	4.70	-	0.13	-	97%
4/10/2014	Hall Environmental	130	4.10	-	0.14	-	97%
4/14/2014	Hall Environmental	108	3.90	-	0.16	-	96%
4/17/2014	Hall Environmental	125	4.00	-	0.14	-	97%
4/21/2014	Hall Environmental	105	3.00	-	0.13	-	96%
4/24/2014	Hall Environmental	115	3.50	-	0.25	-	93%
4/28/2014	Hall Environmental	110	3.40	-	0.13	-	96%
5/1/2014	Hall Environmental	70	3.60	-	0.09	-	98%
5/5/2014	Hall Environmental	55	3.40	-	0.05	-	99%
5/8/2014	Hall Environmental	50	3.20	-	0.06	-	98%
5/12/2014	Hall Environmental	50	3.40	-	0.07	-	98%
5/15/2014	Hall Environmental	50	3.60	-	0.07	-	98%
5/19/2014	Hall Environmental	50	3.40	-	0.10	-	97%
5/22/2014	Hall Environmental	95	2.80	-	0.15	-	95%
5/27/2014	Hall Environmental	60	2.90	-	0.08	-	97%
5/29/2014	Hall Environmental	60	3.20	-	0.11	-	97%
6/2/2014	Hall Environmental	64	3.30	-	0.07	-	98%
6/5/2014	Hall Environmental	51	3.10	-	0.09	-	97%
6/9/2014	Hall Environmental	50	3.30	-	0.06	-	98%
6/12/2014	Hall Environmental	60	3.10	-	0.13	-	96%
6/16/2014	Hall Environmental	120	3.30	-	0.54	-	84%

		Flow to SeRT	SeRT Influent		SeRT Effluent		Removal Efficiency
		-	Total Se	TCLP Se	Total Se	TCLP Se	On Total Se
DATE	Laboratory	(gpm)	(ppm)	(ppm)	(ppm)	(ppm)	-
6/19/2014	Hall Environmental	130	3.10	-	0.40	-	87%
6/23/2014	Hall Environmental	130	3.90	-	0.47	-	88%
6/26/2014	Hall Environmental	118	3.00	-	0.30	-	90%
7/1/2014	Hall Environmental	101	2.30	-	0.14	-	94%
7/3/2014	Hall Environmental	115	2.20	-	0.12	-	95%
7/7/2014	Hall Environmental	106	2.70	-	0.17	-	94%
7/14/2014	Hall Environmental	125	3.20	-	<0.05	-	98%
7/17/2014	Hall Environmental	92	2.70	-	0.07	-	97%
7/21/2014	Hall Environmental	120	2.70	-	0.23	-	91%
7/24/2014	Hall Environmental	80	2.80	-	0.14	-	95%
7/28/2014	Hall Environmental	114	2.50	-	0.28	-	89%
7/31/2014	Hall Environmental	118	3.50	-	0.32	-	91%
8/4/2014	Hall Environmental	96	3.30	-	0.06	-	98%
8/7/2014	Hall Environmental	125	3.00	-	0.04	-	99%
8/11/2014	Hall Environmental	100	2.80	-	0.04	-	99%
8/15/2014	Hall Environmental	100	3.60	-	0.04	-	99%
8/21/2014	Hall Environmental	100	3.10	-	0.04	-	99%
8/25/2014	Hall Environmental	100	1.60	-	0.03	-	98%
8/28/2014 ¹	Hall Environmental	105	2.60	-	<0.05	-	98%
9/2/2014	Hall Environmental	105	3.90	-	0.04	-	99%
9/4/2014	Hall Environmental	105	3.90	-	0.03	-	99%
9/8/2014	Hall Environmental	95	4.60	-	0.06	-	99%
9/11/2014	Hall Environmental	90	4.20	-	0.03	-	99%
9/15/2014	Hall Environmental	90	4.40	-	0.04	-	99%
9/18/2014	Hall Environmental	100	5.00	-	0.04	-	99%
9/22/2014	Hall Environmental	61	5.30	-	0.04	-	99%
9/25/2014	Hall Environmental	90	6.10	-	0.12	-	98%
9/29/2014	Hall Environmental	90	6.40	-	0.07	-	99%
10/2/2014	Hall Environmental	95	6.50	-	0.05	-	99%
10/6/2014	Hall Environmental	100	8.60	-	0.09	-	99%
10/9/2014	Hall Environmental	88	8.90	-	0.11	-	99%
10/13/2014	Hall Environmental	100	7.30	-	0.10	-	99%
10/16/2014	Hall Environmental	115	6.30	-	0.11	-	98%
10/20/2014	Hall Environmental	115	5.10	-	0.13	-	97%
10/23/2014	Hall Environmental	100	4.40	-	0.09	-	98%
10/27/2014	Hall Environmental	105	2.50	-	0.06	-	98%
10/30/2014	Hall Environmental	90	3.70	-	0.04	-	99%
11/3/2014	Hall Environmental	100	3.20	-	0.03	-	99%

		Flow to SeRT	SeRT Influent		SeRT Effluent		Removal Efficiency
		-	Total Se	TCLP Se	Total Se	TCLP Se	On Total Se
DATE	Laboratory	(gpm)	(ppm)	(ppm)	(ppm)	(ppm)	-
11/6/2014	Hall Environmental	100	3.50	-	0.03	-	99%
11/10/2014	Hall Environmental	110	2.70	-	0.05	-	98%
11/13/2014	Hall Environmental	110	3.30	-	0.06	-	98%
11/17/2014	Hall Environmental	100	3.30	-	0.03	-	99%
11/24/2014	Hall Environmental	90	3.50	-	0.04	-	99%
11/26/2014	Hall Environmental	100	3.50	-	0.39	-	89%
12/1/2014	Hall Environmental	100	3.80	-	1.10	-	71%
12/2/2014	Hall Environmental	100	3.90	-	1.10	-	72%
12/8/2014	Hall Environmental	100	4.00	-	1.50	-	63%
12/10/2014	Hall Environmental	100	5.20	-	0.37	-	93%
12/11/2014	Hall Environmental	100	5.20	-	0.35	-	93%
12/12/2014	Hall Environmental	100	2.20	-	0.12	-	95%
12/15/2014	Hall Environmental	90	5.10	-	0.10	-	98%
12/18/2014	Hall Environmental	90	4.20	-	0.05	-	99%
12/22/2014	Hall Environmental	95	3.70	-	0.07	-	98%
12/29/2014	Hall Environmental	100	3.60	-	0.10	-	97%
1/2/2015	Hall Environmental	95	3.20	-	0.09	-	97%
1/5/2015	Hall Environmental	70	3.90	-	0.08	-	98%
1/8/2015	Hall Environmental	85	3.50	-	0.07	-	98%
1/12/2015	Hall Environmental	84	3.50	-	<0.050	-	99%
1/15/2015	Hall Environmental	72	2.80	-	1.40	-	50%
1/19/2015	Hall Environmental	82	2.50	-	0.09	-	96%

¹ The sampling event on August 28, 2014 showed a SeRT Influent concentration of <0.05 ppm and a SeRT Effluent concentration of 2.60 ppm. Samples were likely either switched in the field before being labeled, or mislabeled. Table 3 shows the correct concentration associated with each location.

April 1, 2014

- Required sampling from this point forward reduced to a quarterly basis per Condition 1(c) of Exhibit A to the Order.

April 22, 2014

- First Amendment to Exhibit A signed by Navajo and OCD.

June 2, 2014

- Navajo submitted a minor permit modification requested by OCD for the installation of the SeRT® & ICP units at the Artesia Refinery.

June 24, 2014

- OCD approved the modification request submitted on June 2.

June 1 to 2, 2014

- Navajo temporarily stopped injection while doing the Pressure Fall Off Tests (PFOTs) and Mechanical Integrity Testing (MIT) for Well 1.²

June 30 to July 2, 2014

- Navajo temporarily stopped injection while doing the PFOTs and MIT for Well 2.²

July 7-9, 2014

- Used SeRT® media was replaced by new media. The media change-out started on July 7, 2014 and was completed on July 9, 2014. The unit was brought on-line on July 10, 2014. The pH probes were also replaced.

August 11, 2014

- Met with OCD to discuss amending Exhibit A to clarify reporting and sampling in connection with cessation of well injection per Navajo's July 25, 2014 letter.

August 25-28, 2014

- Navajo temporarily stopped injection for PFOTs and MIT for Well 3.²

September 3 and 8, 2014

- Second Amendment to Exhibit A signed by OCD and Navajo.

September 15, 2014

- Notice of Compliance with Selenium Limit submitted to OCD.

September 30, 2014

- Notice of selection of long-term option for addressing selenium concentrations in wastewater submitted to OCD.

November 19, 2014

- Third Amendment to Exhibit A signed by OCD and Navajo.
- Navajo paid OCD the stipulated penalty of \$26,000 for late submission of October 1, 2014 quarterly sampling results.

As noted in the February 2014 monthly interim progress report submitted on March 3, 2014, Navajo will consider discontinuing ferric chloride injection based on the performance of the 100 gpm SeRT® unit. Also, as noted above, on September 30, 2014, Navajo submitted to OCD its notice of selection of long-term option for selenium reduction pursuant to Paragraph 15 of Exhibit A to the Order. Navajo selected the existing SeRT® unit, without modification, based on its proven effectiveness in reducing selenium concentrations (now, as of the January 19, 2015 sample, at an

² Pressure Fall Off tests and Mechanical Integrity Testing are unrelated to selenium concentrations in the wastewater injected at the wells.

average total selenium removal efficiency of 94.2%) and Navajo's record of compliance with the Se Limit using this technology.³

In addition to the status and timeline of actions taken by Navajo, this monthly report includes the requirements of items a-c of Paragraph 9 of Exhibit A to the Order, as follows.

- a) A summary of all the results of sampling required pursuant to Paragraph 1, above, and copies of all supporting laboratory data.*

A summary of the results of sampling collected pursuant to Paragraph 1 of Exhibit A to the Order are provided in Table 4. This table includes only those samples collected at the OCD-approved Sample Location (location shown in Attachment A) on the first business day of each week after the effective date of the Order up to April 1, 2014. The April 1 sampling event constituted the fourth consecutive monthly sample below the 1.0 mg/L limit and, therefore, pursuant to Condition 1(c) of Exhibit A to the Order, sampling is being conducted on a quarterly basis on the first business day of the quarter. The 4th quarter 2014 quarterly sample was taken on October 1, 2014 and the 1st quarter 2015 quarterly sample was taken on Friday, January 2, 2015. The next quarterly sample is scheduled to be taken on Wednesday, April 1, 2015. There have been no non-compliant sampling events since issuance of the Order on November 14, 2013. Additional monitoring is also presented in Table 4. As noted above, since the November monthly progress report, the 1st quarter 2015 sample was taken pursuant to Paragraph 1(c) of Exhibit A to the Order on January 2, 2015, and the lab report for the January 2, 2015 quarterly sample can be found in Attachment B. (The laboratory report for the October 1, 2014 quarterly sampling event was submitted with the October monthly progress report.)

As described in the December 4, 2013 review of selenium sampling data report, CH2M HILL made certain recommendations to modify sample preparation and processing in order to decrease variability in sampling analysis procedures and analytical instrumentation configurations used by Navajo's contract laboratories. Specifically, Hall Environmental implemented the following procedural modifications starting December 9, 2013, among certain other earlier changes:

1. Filtrations for TCLP analysis by EPA Method 1311 are now made using a 0.7 micron glass fiber filter.
2. An acid matrix of 6% nitric acid and 5% hydrochloric acid is now used in accordance with EPA Method 3010.
3. Calibration standards and quality control samples are now prepared using the same acid matrix (6% nitric acid and 5% hydrochloric acid).
4. An internal standard of yttrium or scandium is now used in all samples. If the recovery of the internal standard exceeds 120%, the samples are to be screened for a native presence of the internal standard. If the samples natively contain the target internal standard, an alternate internal standard is to be utilized.
5. The same preparation batches and analytical batches are now used for digestion and analysis of TCLP and total selenium samples. Ideally, a sample is analyzed for total selenium and is

³ As explained in the September 30th notice, Navajo reserves the right to modify the current SeRT® unit in the future should changes become necessary based on wastewater effluent characteristics, refinery operational needs or other circumstances.

then analyzed for TCLP selenium immediately afterwards to reduce variations due to instrument calibration, instrument drift, or digestate age.

6. All spectra for samples are now reviewed to verify that there are no optical interferences and that peaks are being correctly integrated.
7. All split samples are now analyzed using the same acid digestion and analytical methods to ensure data comparability.

Table 4: Selenium Measurements Collected Pursuant to Paragraph 1 of Exhibit A to the Order (mg/L)

DATE	Sampling Location	Laboratory	Method	TCLP Selenium (mg/L)	
				Split Samples	Average ²
10/24/2013 ¹	T-801 Effluent	ALS Environmental	SW1311/ 6020	0.82	0.78
		Hall Environmental	EPA 6010B	0.74	
10/28/2013 ¹	T-801 Effluent	Hall Environmental	EPA 6010B	0.98	0.98
11/4/2013 ¹	Injection Well Effluent Sampling Point	Hall Environmental	EPA 6010B	1.10	1.10
11/11/2013 ¹	Injection Well Effluent Sampling Point	Hall Environmental	EPA 6010B	0.088	0.088
11/18/2013	Injection Well Effluent Sampling Point	Hall Environmental	EPA 6010B	0.78	0.78
11/25/2013	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.75	0.75
12/2/2013	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.88	0.88
12/9/2013 ³	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.38	0.38
12/16/2013	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.35	0.35
12/23/2013	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.27	0.27
12/30/2013	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.33	0.33
1/6/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.23	0.23
1/13/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.31	0.31
1/20/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.51	0.51
1/27/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.49	0.49
2/3/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.56	0.56
2/10/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.20	0.20
2/17/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.20	0.20
2/24/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.28	0.28
3/3/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.14	0.14
3/10/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.05	0.05
3/13/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.08	0.08
3/17/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.05	0.05
3/24/2014	T-801 Effluent to Wells	Hall Environmental	EPA6010B	0.15	0.15
4/1/2014 ⁴	T-801 Effluent to Wells	Hall Environmental	EPA6010B	0.08	0.08
7/3/2014 ⁴	T-801 Effluent to Wells	Hall Environmental	EPA6010B	< 0.027	< 0.027
10/1/2014 ⁴	T-836 Effluent to Wells	Hall Environmental	EPA6010B	0.04	0.04
1/2/2015 ⁴	T-801 Effluent to Wells	Hall Environmental	EPA6010B	< 0.027	< 0.027

¹Samples collected per the requirements of the Agreed Compliance Order No. WQA-OCD-CO-2013-001 signed on October 24, 2013.

²For split samples.

³Digestion procedure and sample processing altered as described above.

⁴Required sampling conducted on a quarterly basis per Condition 1(c) of Exhibit A to the Order – accentuated as requested by Carl Chavez on April 30, 2014.

- b) A summary of the results of any optional sampling taken during the preceding calendar month (copies of laboratory data for such optional sampling shall be provided to OCD upon request).*

A summary of all of the TCLP selenium concentrations measured at the OCD-approved Sample Location and at the effluent of treatment tanks T-801 and T-836 is provided in Attachment C. All of the TCLP selenium measurements for all refinery sample locations are provided in Attachment D, and all of the total selenium measurements for all refinery sample locations are provided in Attachment E. The data provided in all of these attachments is for sampling performed during the months of October 2013, November 2013, December 2013, and calendar year 2014 through January 19, 2015.

- c) The calculation of stipulated penalties required under Section III, Paragraph 2 of the Order.*

As of the most recent sampling event, there are no new reported exceedances of the Se Limit. On November 20, 2013 Navajo submitted payment of the penalty of \$26,000 established in the Order for prior reported selenium concentrations above the Se Limit. As explained in Navajo's July 25, 2014 letter to OCD, Navajo was unable to conduct quarterly sampling on July 1, because there was no injection at the wells on that day due to PFOTs and mechanical integrity testing. Quarterly sampling was not conducted until July 3, 2014, after the discharge to the wells resumed, a delay of two days. Also, Navajo was one day late in submitting the results of its quarterly selenium sampling to OCD, which were required to be submitted by July 17, and were instead submitted on July 18, 2014. Per the stipulated penalty schedule at Section III, Paragraph 2 of the Order, Navajo calculated a stipulated penalty of \$5,000.⁴ This sum was paid by letter dated August 21, 2014. Navajo was also late in submitting the results of its October 1, 2014 quarterly selenium sampling to OCD, which were received on October 6, 2014, and conservatively assumed to be required to be submitted by October 8. They were instead submitted on November 3, and as a result, were 26 days late. Based on this, and per the stipulated penalty schedule at Section III, Paragraph 2 of the Order, Navajo calculated a stipulated penalty of \$26,000.⁵ This sum was paid by letter dated November 19, 2014. Navajo is taking preventive steps to help ensure timely quarterly sampling and reporting of corresponding sample results.

⁴ Per Order Section III, Paragraph (2)(b)(4), for failure to conduct timely sampling, \$2,000 per day X 2 days = \$4,000; per Order Section III, Paragraph (2)(b)(5), for failure to timely submit any report or notification, \$1,000 per day X 1 day = \$1,000.

⁵ Per Order Section III, Paragraph (2)(b)(5), for failure to timely submit any report or notification, \$1,000 per day X 26 days = \$26,000.

If you have any questions, please do not hesitate to contact me at (575) 308-1511 or brian.stone@hollyfrontier.com. Thank you for your assistance in this matter and we will continue to work closely with you as we resolve the issues associated with selenium concentrations.

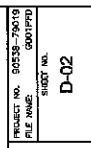
Sincerely,

BM STONE

Brian Stone
Environmental Specialist

Navajo Refining Company, L.L.C.

Attachment A:
OCD-Approved Sample Location



PROJECT NO. 90538-79019	SHOOT NO.
FILE NAME: 9001.PFD	D-02

Attachment B:
Laboratory Reports for Samples Collected Pursuant to
Paragraph 1 of Exhibit A to the Order



*Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com*

January 12, 2015

Mike Holder
Navajo Refining Company
P.O. Box 159
Artesia, NM 88211-0159
TEL: (575) 748-3311
FAX

RE: Quarterly WW Effluent Monitoring

OrderNo.: 1501149

Dear Mike Holder:

Hall Environmental Analysis Laboratory received 1 sample(s) on 1/7/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report

Lab Order 1501149

Date Reported: 1/12/2015

Hall Environmental Analysis Laboratory, Inc.**CLIENT:** Navajo Refining Company**Client Sample ID:** Effluent to Wells (location #6)**Project:** Quarterly WW Effluent Monitoring**Collection Date:** 1/2/2015 8:30:00 AM**Lab ID:** 1501149-001**Matrix:** AQUEOUS**Received Date:** 1/7/2015 9:45:00 AM

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed	Batch ID
EPA METHOD 6010B: TCLP METALS							Analyst: ELS	
Selenium	ND	0.027	0.050		mg/L	1	1/8/2015 6:21:27 AM	17109
EPA 6010B: TOTAL METALS							Analyst: ELS	
Selenium	0.029	0.014	0.050	J	mg/L	1	1/8/2015 6:19:37 AM	17109

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RSD is greater than RSDlimit	P	Sample pH greater than 2.
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1501149

12-Jan-15

Client: Navajo Refining Company
Project: Quarterly WW Effluent Monitoring

Sample ID	MB-17109	SampType:	MBLK	TestCode:	EPA Method 6010B: TCLP Metals						
Client ID:	PBW	Batch ID:	17109	RunNo:	23522						
Prep Date:	1/7/2015	Analysis Date:	1/8/2015	SeqNo:	694945	Units:	mg/L				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Selenium	ND	1.0									

Sample ID	LCS-17109	SampType:	LCS	TestCode:	EPA Method 6010B: TCLP Metals						
Client ID:	LCSW	Batch ID:	17109	RunNo:	23522						
Prep Date:	1/7/2015	Analysis Date:	1/8/2015	SeqNo:	694946	Units:	mg/L				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Selenium	0.48	1.0	0.5000	0	95.3	80	120			J	

Qualifiers:

- | | |
|---|--|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1501149

12-Jan-15

Client: Navajo Refining Company
Project: Quarterly WW Effluent Monitoring

Sample ID	MB-17109	SampType:	MBLK	TestCode:	EPA 6010B: Total Metals						
Client ID:	PBW	Batch ID:	17109	RunNo:	23522						
Prep Date:	1/7/2015	Analysis Date:	1/8/2015	SeqNo:	694914	Units:	mg/L				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Selenium	ND	0.050									

Sample ID	LCS-17109	SampType:	LCS	TestCode:	EPA 6010B: Total Metals						
Client ID:	LCSW	Batch ID:	17109	RunNo:	23522						
Prep Date:	1/7/2015	Analysis Date:	1/8/2015	SeqNo:	694915	Units:	mg/L				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Selenium	0.48	0.050	0.5000	0	95.3	80	120				

Qualifiers:

- | | |
|---|--|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87105
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: NAVAJO REFINING COM

Work Order Number: 1501149

ReptNo: 1

Received by/date:	CS	01/07/15
Logged By:	Lindsay Mangin	1/7/2015 9:45:00 AM
Completed By:	Lindsay Mangin	1/7/2015 10:26:15 AM
Reviewed By:	JH/TO	01/07/15

Chain of Custody

- | | | | |
|--|---|-----------------------------|--------------------------------------|
| 1. Custody seals intact on sample bottles? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Not Present <input type="checkbox"/> |
| 2. Is Chain of Custody complete? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Not Present <input type="checkbox"/> |
| 3. How was the sample delivered? | FedEx | | |

Log In

- | | | | |
|--|---|--|--|
| 4. Was an attempt made to cool the samples? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | NA <input type="checkbox"/> |
| 5. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | NA <input type="checkbox"/> |
| 6. Sample(s) in proper container(s)? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 7. Sufficient sample volume for indicated test(s)? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 8. Are samples (except VOA and ONG) properly preserved? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 9. Was preservative added to bottles? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | NA <input type="checkbox"/> |
| 10. VOA vials have zero headspace? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | No VOA Vials <input checked="" type="checkbox"/> |
| 11. Were any sample containers received broken? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | |
| 12. Does paperwork match bottle labels?
(Note discrepancies on chain of custody) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 13. Are matrices correctly identified on Chain of Custody? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 14. Is it clear what analyses were requested? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| 15. Were all holding times able to be met?
(If no, notify customer for authorization.) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |

of preserved bottles checked for pH: 1
(<2 or >12 unless noted)
Adjusted: NO
Checked by: CS

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified:		Date:	
By Whom:		Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:			
Client Instructions:			

17. Additional remarks:

18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

Attachment C:
Additional Monitoring Performed at the Injection Well Effluent
Sampling Location and Treatment Tanks T-801 and T-836

Attachment C Table 1: TCLP Selenium Measurements Collected from the Injection Well Effluent Sampling Location, Tank T-801, and Tank T-836 Effluent (mg/L), EPA Method SW1311/6020/6010

DATE	Sampling Location	Split Samples (mg/L)				Average (mg/L)
		Laboratory	TCLP Selenium Concentration	Laboratory	TCLP Selenium Concentration	
9/27/2013	Injection Well Effluent Sampling Point	ALS	1.24	-	-	1.24
10/15/2013	Injection Well Effluent Sampling Point	ALS	1.24	-	-	1.24
10/20/2013	T-801 Effluent	Hall	0.85	ALS	0.803	0.83
10/20/2013	T-836 Effluent	Hall	0.91	ALS	0.888	0.90
10/22/2013	T-801 Effluent	Hall	0.75	ALS	0.708	0.73
10/22/2013	T-836 Effluent	Hall	0.65	ALS	0.823	0.74
10/23/2013	T-801 Effluent	Hall	0.79	ALS	0.835	0.81
10/23/2013	T-836 Effluent	Hall	0.75	ALS	0.831	0.79
10/24/2013	T-801 Effluent	Hall	0.74	ALS	0.821	0.78
10/24/2013	T-836 Effluent	Hall	0.58	ALS	0.648	0.61
10/25/2013	T-801 Effluent	Hall	0.79	-	-	0.79
10/25/2013	T-836 Effluent	Hall	0.71	-	-	0.71
10/26/2013	T-801 Effluent	Hall	0.81	-	-	0.81
10/26/2013	T-836 Effluent	Hall	0.83	-	-	0.83
10/27/2013	T-801 Effluent	Hall	0.95	-	-	0.95
10/27/2013	T-836 Effluent	Hall	0.75	-	-	0.75
10/28/2013	T-801 Effluent	Hall	0.98	-	-	0.98
10/28/2013	T-836 Effluent	Hall	0.84	-	-	0.84
10/29/2013	T-801 Effluent	Hall	0.99	Cardinal	0.98	0.99
10/29/2013	T-836 Effluent	Hall	0.94	Cardinal	0.97	0.95
10/30/2013	T-801 Effluent	Hall	0.83	Cardinal	0.88	0.85
10/30/2013	T-836 Effluent	Hall	0.88	Cardinal	0.90	0.89
10/31/2013	Injection Well Effluent Sampling Point	Hall	1.20	-	-	1.20
10/31/2013	T-801 Effluent	Hall	0.80	Cardinal	1.09	0.95
10/31/2013	T-836 Effluent	Hall	1.20	Cardinal	1.26	1.23
11/1/2013	T-801 Effluent	Hall	0.89	Cardinal	0.94	0.92
11/1/2013	T-836 Effluent	Hall	1.10	Cardinal	1.16	1.13
11/2/2013	No Sample	-	-	-	-	-
11/3/2013	No Sample	-	-	-	-	-
11/4/2013	Injection Well Effluent Sampling Point	Hall	1.10	-	-	1.10
11/4/2013	T-801 Effluent	Hall	0.74	-	-	0.74
11/4/2013	T-836 Effluent	Hall	0.98	-	-	0.98
11/5/2013	Injection Well Effluent Sampling Point	Hall	1.20	-	-	1.20

DATE	Sampling Location	Split Samples (mg/L)				Average (mg/L)
		Laboratory	TCLP Selenium Concentration	Laboratory	TCLP Selenium Concentration	TCLP Selenium Concentration
11/5/2013	T-801 Effluent	Hall	1.20			1.20
11/6/2013	T-836 Effluent	Hall	0.73			0.73
11/7/2013	T-801 Effluent	Hall	0.95			0.95
11/7/2013	T-836 Effluent	Hall	1.10			1.10
11/8/2013	T-801 Effluent	Hall	0.78			0.78
11/8/2013	T-836 Effluent	Hall	1.20			1.20
11/9/2013	T-836 Effluent	Hall	1.1			1.10
11/10/2013	T-836 Effluent	Hall	1.1			1.10
11/11/2013	Injection Well Effluent Sampling Point	Hall	0.088	-	-	0.09
11/11/2013	T-836 Effluent	Hall	1.100			1.10
11/12/2013	No Sample	-	-	-	-	-
11/13/2013	No Sample	-	-	-	-	-
11/14/2013	T-836 Effluent	Hall	1.0			0.99
11/15/2013	No Sample	-	-	-	-	-
11/16/2013	Injection Well Effluent Sampling Point	Hall	<0.1 (ND)	-	-	-
11/17/2013	Injection Well Effluent Sampling Point	Hall	0.96	-	-	0.96
11/18/2013	Injection Well Effluent Sampling Point	Hall	0.78	-	-	0.78
11/18/2013	T-836 Effluent	Hall	1.00			1.00
11/19/2013	T-836 Effluent to Wells	Hall	0.95	-	-	0.95
11/20/2013	Injection Well Effluent Sampling Point	Hall	0.76	-	-	0.76
11/21/2013	T-801 Effluent to Wells	Hall	0.73	-	-	0.73
11/22/2013	T-836 Effluent to Wells	Hall	0.80	-	-	0.80
11/23/2013	T-801 Effluent to Wells	Hall	0.75	-	-	0.75
11/24/2013 ¹	T-836 Effluent to Wells	Hall	0.84	-	-	0.84
11/25/2013	T-801 Effluent to Wells	Hall	0.75	-	-	0.75
11/26/2013	T-836 Effluent to Wells	Hall	0.72	-	-	0.72
11/27/2013	T-801 Effluent to Wells	Hall	0.69	-	-	0.69
11/28/2013	T-836 Effluent to Wells	Hall	0.80	-	-	0.80
11/29/2013	T-801 Effluent to Wells	Hall	0.75	-	-	0.75
11/30/2013	T-801 Effluent to Wells	Hall	0.76	-	-	0.76
12/2/2013	Injection Well Effluent Sampling Point	Hall	0.88	-	-	0.88
12/2/2013	T-836 Effluent to Wells	Hall	0.76	-	-	0.76
12/2/2013	T-801 Effluent to Wells	Hall	0.83	-	-	0.83
12/5/2013	T-836 Effluent to Wells	Hall	0.47	-	-	0.47

DATE	Sampling Location	Split Samples (mg/L)				Average (mg/L)
		Laboratory	TCLP Selenium Concentration	Laboratory	TCLP Selenium Concentration	TCLP Selenium Concentration
12/9/2013 ³	T-801 Effluent to Wells	Hall	0.38	-	-	0.38
12/12/2013	Effluent to Wells	Hall	0.56	-	-	0.56
12/16/2013	T-801 Effluent to Wells	Hall	0.35	-	-	0.35
12/19/2013	T-801 Effluent to Wells	Hall	0.24	-	-	0.24
12/23/2013	T-836 Effluent to Wells	Hall	0.27	-	-	0.27
12/26/2013	T-801 Effluent to Wells	Hall	0.27	-	-	0.27
12/30/2013	T-836 Effluent to Wells	Hall	0.33	-	-	0.33
1/6/2014	T-836 Effluent to Wells	Hall	0.23	-	-	0.23
1/9/2014	T-801 Effluent to Wells	Hall	0.29	-	-	0.29
1/13/2014	T-801 Effluent to Wells	Hall	0.31	-	-	0.31
1/16/2014	T-801 Effluent to Wells	Hall	0.24	-	-	0.24
1/20/2014	T-836 Effluent to Wells	Hall	0.51	-	-	0.51
1/23/2014	T-836 Effluent to Wells	Hall	0.23	-	-	0.23
1/27/2014	T-801 Effluent to Wells	Hall	0.49	-	-	0.49
1/30/2014	T-836 Effluent to wells	Hall	0.27	-	-	0.27
2/3/2014	T-836 Effluent to wells	Hall	0.56	-	-	0.56
2/6/2014	T-836 Effluent to wells	Hall	0.40	-	-	0.40
2/10/2014	T-836 Effluent to wells	Hall	0.20	-	-	0.20
2/17/2014	T-801 Effluent to wells	Hall	0.20	-	-	0.20
2/24/2014	T-801 Effluent to wells	Hall	0.28	-	-	0.28
3/3/2014	T-801 Effluent to Wells	Hall	0.14	-	-	0.14
3/10/2014	T-836 Effluent to Wells	Hall	0.05	-	-	0.05
3/13/2014	T-836 Effluent to Wells	Hall	0.08	-	-	0.08
3/17/2014	T-801 Effluent to Wells	Hall	0.05	-	-	0.05
3/24/2014	T-801 Effluent to Wells	Hall	0.15	-	-	0.15
4/1/2014 ⁴	T-801 Effluent to Wells	Hall	0.08	-	-	0.08
6/19/2014	T-801 Effluent to Wells	Hall	<0.10	-	-	<0.10
7/3/2014 ⁴	T-801 Effluent to Wells	Hall	< 0.027	-	-	< 0.027
7/22/2014	T-801 Effluent to Wells	Hall	<0.027	-	-	<0.027
8/25/2014	T-836 Effluent to Wells	Hall	<0.027	-	-	<0.027
8/28/2014	T-836 Effluent to Wells	Hall	<0.027	-	-	<0.027
10/1/2014 ⁴	T-836 Effluent to Wells	Hall	0.04	-	-	0.04
11/3/2014	T-836 Effluent to Wells	Hall	0.10	-	-	0.10
11/6/2014	T-836 Effluent to Wells	Hall	<0.20	-	-	<0.20
1/2/2015 ⁴	T-801 Effluent to Wells	Hall	< 0.027	-	-	< 0.027

Gray Shading = Sampling performed when the tanks were not discharging to the injection wells

Note: Samples labeled as "T-801 Effluent to Wells" or "T-836 Effluent to Wells" were collected from the OCD-approved sample location.

¹ Date of the Agreed Compliance Order No. WQA-OCD-CO-2013-001 signed on October 24, 2013.

² Date of the Supplemental Agreed Compliance Order No. WQA-OCD-CO-2013-001, signed on November 14, 2013.

³ Digestion procedure and sample processing altered as described in the text above based upon the December 4, 2013 CH2M HILL review of selenium sampling data report.

⁴ Required sampling conducted on a quarterly basis per Exhibit A, Condition 1(c) of the Order.

Attachment D:
Additional TCLP Selenium Monitoring Performed at the Navajo
Refinery

DATE	Laboratory	SWS Bottoms (W-634)		SWS Bottoms (W-220)		Dissolver Effluent (W-7)		S&T Feed	OLF Eff.	Soft Eff.	Wet Gas Scrubber Purge (D-529)		Dissolver Effluent (D-528)		AP+144		A17 Outlet	T-481		T-686		T-805 Eff.	DAF Eff.	Water Recycle Eff.	Injection Wells	Storm Tank (T-630)		T-429		Unit 445 Sour Water (W-5421)		Unit 44 Overhead Stripper		Unit P84 MFC Cold Separator		DAF Results Inverters 24	Lab Report	
		Result	Ave*	Result	Ave*	Result	Ave*	Result	Result	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Result	Result	Ave*	Result	Result	Result	Result	Result	Ave*	Result	Result	Result	Ave*	Result	Result	Result	Result	Result		
3/3/2014	Hall Environmental	-	-	-	-	0.24	0.24	5.60	-	0.57	-	-	-	-	-	-	-	-	-	-	-	-	0.12	-	0.14	-	-	-	-	-	-	-	-	-	-	-	1403030 1403042	
3/5/2014	Hall Environmental	-	-	-	-	-	-	5.40	-	0.61	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1403250	
3/6/2014	Hall Environmental	-	-	-	-	-	-	5.40	-	0.52	-	-	-	-	-	-	-	-	-	-	-	0.082	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1403248 1403249	
3/10/2014	Hall Environmental	-	-	-	-	-	-	5.70	-	0.23	-	-	-	-	-	-	-	-	-	-	-	0.044	0.048	-	0.046	-	-	-	-	-	-	-	-	-	-	-	1403361 1403362 1403363	
3/12/2014	Hall Environmental	-	-	-	-	-	-	5.10	-	0.23	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1403558 1403559 1403561	
3/13/2014	Hall Environmental	-	-	-	-	0.87	0.87	5.20	-	0.16	-	-	-	-	-	-	-	-	-	-	-	0.085	0.089	-	0.075	-	-	-	-	-	-	-	-	-	-	-	1403562 1403563 1403564	
3/17/2014	Hall Environmental	-	-	-	-	0.26	0.26	4.80	-	0.19	-	-	-	-	-	-	-	-	-	-	-	0.088	0.076	-	0.052	-	-	-	-	-	-	-	-	-	-	-	1403702 1403708 1403704 1403705	
3/19/2014	Hall Environmental	-	-	-	-	-	-	4.30	-	0.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1403872	
3/20/2014	Hall Environmental	-	-	-	-	-	-	4.80	-	0.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1403870 1403866 1403867 1403868	
3/24/2014	Hall Environmental	-	-	-	-	0.25	0.25	5.40	-	0.28	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.076	-	-	-	-	-	-	-	-	-	-	-	-	1404085
4/1/2014	Hall Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1404085	
6/19/2014	Hall Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<0.10	-	-	-	-	-	-	-	-	-	-	-	-	1406355	
7/3/2014	Hall Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<0.027	-	-	-	-	-	-	-	-	-	-	-	-	1407271	
7/22/2014	Hall Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<0.027	-	-	-	-	-	-	-	-	-	-	-	-	1407142	
8/25/2014	Hall Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<0.027	-	-	-	-	-	-	-	-	-	-	-	-	1408015	
8/28/2014	Hall Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<0.027	-	-	-	-	-	-	-	-	-	-	-	-	1408633	
10/1/2014	Hall Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.086	-	-	-	-	-	-	-	-	-	-	-	-	1410084	
11/3/2014	Hall Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10	-	-	-	-	-	-	-	-	-	-	-	-	1411264	

DATE	Laboratory	SW6 Bottoms (M-52)		SW6 Bottoms (M-52)		Desalator Effluent (M-7)		Salt Feed		Wet Gas Scrubber Purge (D-248)		Desalator Outlet (D-248)		AP Inlet		AP Outlet		T-501		T-505		DAF Eff.		Wastewater Eff.		Injection Water		Storm Tank (T-507)		T-429		Unit 44 Soap Water (M-242)		Unit 44 Overhead Stripper		Unit 84 MIC Cell Separator		DAF Solids Recovery %		Lab Report
		Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*	Result	Avg*			
11/6/2014	Half Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1417288	
1/2/2015	Half Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1501149	

*Average of the split samples. If one result was not detected, the detected value is estimated to be the average.

Attachment E:
Additional Total Selenium Monitoring Performed at the Navajo
Refinery

Attachment E Table 1: Total Selenium Measurements Collected from all Navajo Refinery Sampling Locations from November 1, 2013 through January 19, 2015; EPA Method 200.7/200.8, mg/L

DATE	Laboratory	SWS Bottoms (N-38)	Distiller Effluent (N-7)	Selt' Feed	Selt' Eff.	Wet Gas Sample (P-36)	Distiller Condensate (D-130)	APV-100	API Cond.	T-502	T-506	T-505 Eff.	Water Eff.	Injection Wells	Steam Tank (T-430)	T-509	Unit 405 Sour Water Stripper (W-242)	Unit 405 Quench Stripper	Unit 405 MFC Cold Separator	RO Reject	Lab Report
10/15/2013	ALS Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1310758
10/20/2013	ALS Environmental	4.10	1.50	-	-	0.21	-	-	-	0.87	0.92	-	-	-	-	-	-	-	-	-	1310404
10/20/2013	ALS Environmental	5.14	1.88	1.60	-	0.25	0.28	-	-	1.02	0.95	0.98	-	-	-	-	-	-	-	-	1310659
10/22/2013	ALS Environmental	0.47	0.62	-	-	0.07	-	0.31	-	0.87	0.79	-	-	-	0.38	-	-	-	-	-	1310471
10/22/2013	ALS Environmental	2.31	0.79	0.71	-	0.13	0.10	0.39	0.35	0.59	0.55	0.64	0.79	-	0.58	-	-	-	-	-	1310402
10/22/2013	ALS Environmental	2.50	0.58	-	-	0.10	-	0.33	-	0.88	0.77	-	-	-	0.32	-	-	-	-	-	1310948
10/23/2013	ALS Environmental	2.50	0.54	0.55	-	0.16	0.13	0.32	0.42	0.92	0.88	0.82	-	-	0.37	-	-	-	-	-	1310109
10/24/2013	ALS Environmental	2.30	-	-	-	0.07	-	1.10	-	0.91	0.78	-	-	-	0.33	-	-	-	-	-	1310006
10/24/2013	ALS Environmental	4.77	-	-	-	0.10	0.09	1.83	1.47	1.11	1.01	0.85	-	-	0.53	-	-	-	-	-	1310164
10/25/2013	ALS Environmental	1.60	1.60	1.90	0.13	-	5.10	1.20	1.20	0.92	0.92	1.00	1.00	-	0.37	-	0.05	-	-	-	1310532
10/25/2013	ALS Environmental	1.60	1.60	1.90	0.13	-	5.10	1.20	1.20	0.92	0.92	1.00	1.00	-	0.37	-	0.05	-	-	-	1310532
10/26/2013	ALS Environmental	2.20	2.30	2.30	0.32	-	8.70	0.94	0.94	0.91	0.91	1.10	1.10	-	0.24	-	0.03	-	0.03	-	1310532
10/27/2013	ALS Environmental	2.10	2.50	2.40	0.27	-	9.50	0.54	0.54	1.10	1.10	1.20	1.20	-	0.26	-	0.05	-	0.05	-	1310532
10/28/2013	ALS Environmental	2.40	2.40	2.30	0.08	-	6.60	0.05	0.05	0.91	0.91	0.85	0.85	-	0.21	-	0.08	-	0.08	-	1310532
10/29/2013	ALS Environmental	2.20	2.30	2.30	0.22	-	3.40	0.15	0.15	0.94	1.10	-	-	-	1.40	-	0.09	-	0.29	-	1310078
10/29/2013	ALS Environmental	1.92	2.05	2.47	2.39	0.22	4.38	0.15	0.15	0.63	0.74	1.00	-	-	0.51	-	0.01	-	<0.0041	-	1310078
10/30/2013	ALS Environmental	2.20	2.20	2.20	0.10	-	5.40	0.11	0.11	0.98	0.95	-	-	-	0.26	-	0.05	-	0.25	-	1310532
10/30/2013	ALS Environmental	2.14	2.17	2.52	2.36	0.21	6.32	0.11	0.11	0.61	0.60	0.92	-	-	0.24	-	2.15	-	2.67	-	1310532
10/31/2013	ALS Environmental	2.20	2.30	2.30	0.39	-	1.50	0.05	0.05	1.20	1.20	-	-	-	0.88	0.29	0.13	-	0.14	-	1310532
10/31/2013	ALS Environmental	2.86	2.53	2.98	2.64	0.32	2.87	0.05	0.05	0.65	0.93	0.99	-	-	0.29	-	2.51	-	2.99	-	1310532
11/2/2013	ALS Environmental	1.70	2.00	2.00	0.21	-	3.90	0.31	-	0.57	1.10	-	-	-	0.28	-	0.30	-	0.37	-	1310532
11/2/2013	ALS Environmental	1.95	1.88	2.53	2.27	0.18	4.63	0.33	0.32	0.62	0.79	0.85	0.97	-	0.24	-	2.58	-	2.92	-	1310532
11/4/2013	ALS Environmental	2.10	2.10	2.40	2.40	-	-	-	-	0.10	1.10	0.66	0.66	-	0.58	-	-	-	-	-	1310532
11/5/2013	ALS Environmental	-	-	-	-	-	-	-	-	0.94	0.84	-	-	-	0.51	-	-	-	-	-	1311556
11/5/2013	ALS Environmental	-	-	-	-	-	-	-	-	1.00	1.00	-	-	-	-	-	-	-	-	-	1311556
11/7/2013	ALS Environmental	2.10	2.10	2.00	2.00	-	-	0.13	1.10	1.10	1.00	1.00	-	-	-	-	-	-	-	-	1311269
11/8/2013	ALS Environmental	1.50	1.30	1.80	1.80	-	-	0.21	0.21	0.51	0.91	0.99	-	-	-	-	-	-	-	-	1311362
11/9/2013	ALS Environmental	1.50	1.50	1.70	1.70	-	-	-	-	0.13	-	0.86	-	-	-	-	-	-	-	-	1311362

DATE	Laboratory	SWR testwater (W-20)		SWR testwater (W-20)		Dissolved Effluent (W-27)		SO ₄ ²⁻ Eff. (W-27)		Wet Gas Scrubber eff. (W-27)		Dissolved Oxygen (D-20)		API inlet		API Outlet		T-401		T-406		T-405 Eff.		Wastewater Eff.		Injection Wells (T-400)		Unit 445 Water (W-421)		Unit 44 Overhead Sump		Unit 604 Misc Cond Separator		NO Project	Lab Report								
		Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*	Result	Ave*										
11/10/2013	Hall	Environmental	2.00	2.00	1.80	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311969	-				
11/11/2013	Hall	Environmental	1.70	1.70	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311402	-				
11/12/2013	CHM HILL ASL	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	M9259	-			
11/14/2013	Hall	Environmental	1.60	1.60	1.60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311625	-			
11/16/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311603	-			
11/17/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311604	-			
11/18/2013	Hall	Environmental	2.70	2.70	2.80	2.80	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311743	-		
11/19/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311742	-		
11/20/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311802	-		
11/21/2013	Hall	Environmental	3.30	3.30	3.30	3.30	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311693	-		
11/22/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311970	-		
11/23/2013	Hall	Environmental	0.86	0.86	1.10	1.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311971	-		
11/24/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311938	-		
11/25/2013	Hall	Environmental	3.30	3.30	3.10	3.10	1.90	1.90	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311806	-	
11/26/2013	Hall	Environmental	2.10	2.10	3.20	3.20	0.39	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311805	-	
11/27/2013	Hall	Environmental	2.90	2.90	2.80	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311844	-	
11/28/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311846	-	
11/29/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311997	-	
11/30/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311989	-	
12/1/2013	Hall	Environmental	3.20	3.20	3.20	3.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311901	-
12/2/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312046	-	
12/3/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312047	-	
12/4/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312228	-	
12/5/2013	Hall	Environmental	3.00	3.00	3.10	3.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312315	-	
12/6/2013	Hall	Environmental	3.70	3.70	3.40	3.40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312315	-	
12/7/2013	Hall	Environmental	4.20	4.20	4.20	4.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312548	-	
12/8/2013	Hall	Environmental	3.90	3.90	3.90	3.90	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686	-	
12/9/2013	Hall	Environmental	4.80	4.80	4.60	4.60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686	-	
12/10/2013	Hall	Environmental	5.80	5.80	5.70	5.70	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686	-	
12/11/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312001	-	
12/12/2013	Hall	Environmental	3.50	3.50	3.50	3.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312046	-	
12/13/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312047	-	
12/14/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312228	-	
12/15/2013	Hall	Environmental	4.20	4.20	4.20	4.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312315	-	
12/16/2013	Hall	Environmental	3.90	3.90	3.90	3.90	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312315	-	
12/17/2013	Hall	Environmental	4.80	4.80	4.60	4.60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312548	-	
12/18/2013	Hall	Environmental	5.80	5.80	5.70	5.70	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686	-	
12/19/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686	-	
12/20/2013	Hall	Environmental	3.50	3.50	3.50	3.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312001	-	
12/21/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312046	-	
12/22/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312047	-	
12/23/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312225	-	
12/24/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312228	-	
12/25/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312315	-	
12/26/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312315	-	
12/27/2013	Hall	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312548	-	
12/28/2013	Hall	Environmental	3.50	3.50	3.50	3.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686	-	
12/29/2013	Hall	Environmental	4.80	4.80	4.60	4.60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686	-	
12/30/2013	Hall	Environmental	5.80	5.80	5.70	5.70	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-												

DATE	Laboratory	SWS Systems (M-24)		SWS Systems (M-25)		Dissolved Effluent (M-7)		SeT Feed	SeT Eff.	Wet Gas Scrubber Range (P-25)	Dissolver Control (P-15A)	Am-Isot		API Outlet	T-405		T-405 Eff.	DAF Eff.	Weight Filter Eff.	Injection Wells	Storm Tank (P-30)	T-409	Unit 445 Water (M-242)	Unit 44 Overhead Stream	Unit 44 Metric Cold Stream	RD Project	Lab Report
		Result	Ave	Result	Ave	Result	Ave	Result	Result	Result	Result	Result	Ave	Result	Result	Ave	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result
9/15/2014	Environmental	-	-	-	-	-	-	4.40	0.037	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1409711
9/15/2014	Hall	-	-	-	-	-	-	5.00	0.04	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1409862
9/22/2014	Environmental	-	-	-	-	-	-	5.30	0.044	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1409860
9/25/2014	Hall	-	-	-	-	-	-	6.10	0.12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1409882
9/29/2014	Environmental	-	-	-	-	-	-	6.40	0.072	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1409912
10/1/2014	Hall	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410094
10/7/2014	Environmental	-	-	-	-	-	-	6.50	0.05	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410252
10/6/2014	Hall	-	-	-	-	-	-	8.60	0.066	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410276
10/9/2014	Environmental	-	-	-	-	-	-	8.90	0.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410515
10/13/2014	Environmental	-	-	-	-	-	-	7.20	0.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410534
10/14/2014	Hall	-	-	-	-	-	-	6.30	0.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410643
10/20/2014	Environmental	-	-	-	-	-	-	5.10	0.13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410654
10/29/2014	Hall	-	-	-	-	-	-	4.40	0.089	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410861
10/29/2014	Environmental	-	-	-	-	-	-	2.50	0.058	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410849
10/30/2014	Hall	-	-	-	-	-	-	3.70	0.04	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1410893
11/3/2014	Environmental	-	-	-	-	-	-	3.20	0.028	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1411035
11/3/2014	Hall	-	-	-	-	-	-	3.50	0.033	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1411054
11/6/2014	Environmental	-	-	-	-	-	-	2.70	0.046	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1411371
11/10/2014	Environmental	-	-	-	-	-	-	3.30	0.055	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1411551
11/13/2014	Hall	-	-	-	-	-	-	3.50	0.028	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1411580
11/17/2014	Environmental	-	-	-	-	-	-	3.50	0.048	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1411662
11/24/2014	Hall	-	-	-	-	-	-	3.50	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1412025
12/6/2014	Environmental	-	-	-	-	-	-	3.20	1.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1412052
12/7/2014	Hall	-	-	-	-	-	-	3.20	1.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1412052
12/14/2014	Environmental	-	-	-	-	-	-	4.00	1.30	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1412314
12/19/2014	Hall	-	-	-	-	-	-	5.20	0.37	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1412470
12/19/2014	Environmental	-	-	-	-	-	-	5.20	0.35	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1412531
12/11/2014	Hall	-	-	-	-	-	-	5.20	0.35	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1412543
12/12/2014	Environmental	-	-	-	-	-	-	2.20	0.12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1412649

Chavez, Carl J, EMNRD

From: Stone, Brian <Brian.Stone@HollyFrontier.com>
Sent: Tuesday, January 13, 2015 11:11 AM
To: Dawson, Scott, EMNRD; Chavez, Carl J, EMNRD
Cc: Holder, Mike; Coons, Christina (Christie)
Subject: 1/2/2015 Effluent Se Results
Attachments: Rpt_1501149_Final_v1.pdf

Scott/Carl – attached are the effluent selenium results for January 2, 2015.

For 1/2/15:

Total Effluent Se = 0.029 mg/L

TCLP Effluent Se = ND mg/L

Selenium sampling is conducted on a quarterly basis on the first business day of the quarter per Exhibit A Condition 1(c) to the Amended and Supplemented Order dated November 14, 2013. The next scheduled sampling date will be Wednesday, April 1, 2015. Please let me know if you have a different interpretation or if you have any questions or comments. Thanks again for your assistance in this matter.

Brian Stone
Environmental Specialist
Navajo Refining Company, L.L.C.
501 E Main Street
Artesia, NM 88210
(575) 746-5294 (office)
(575) 308-1511 (cell)

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4901 Hawkins NE
Albuquerque, NM 87109
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Website: www.hallenvironmental.com

January 12, 2015

Mike Holder
Navajo Refining Company
P.O. Box 159
Artesia, NM 88211-0159
TEL: (575) 748-3311
FAX

RE: Quarterly WW Effluent Monitoring

OrderNo.: 1501149

Dear Mike Holder:

Hall Environmental Analysis Laboratory received 1 sample(s) on 1/7/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Freeman', is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order **1501149**

Date Reported: **1/12/2015**

CLIENT: Navajo Refining Company

Client Sample ID: Effluent to Wells (location #6)

Project: Quarterly WW Effluent Monitoring

Collection Date: 1/2/2015 8:30:00 AM

Lab ID: 1501149-001

Matrix: AQUEOUS

Received Date: 1/7/2015 9:45:00 AM

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed	Batch ID
EPA METHOD 6010B: TCLP METALS							Analyst: ELS	
Selenium	ND	0.027	0.050		mg/L	1	1/8/2015 6:21:27 AM	17109
EPA 6010B: TOTAL METALS							Analyst: ELS	
Selenium	0.029	0.014	0.050	J	mg/L	1	1/8/2015 6:19:37 AM	17109

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RSD is greater than RSDlimit	P	Sample pH greater than 2.
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1501149

12-Jan-15

Client: Navajo Refining Company
Project: Quarterly WW Effluent Monitoring

Sample ID	MB-17109		SampType:	MBLK		TestCode:	EPA Method 6010B: TCLP Metals				
Client ID:	PBW		Batch ID:	17109		RunNo:	23522				
Prep Date:	1/7/2015		Analysis Date:	1/8/2015		SeqNo:	694945		Units: mg/L		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Selenium	ND	1.0									

Sample ID	LCS-17109		SampType:	LCS		TestCode:	EPA Method 6010B: TCLP Metals				
Client ID:	LCSW		Batch ID:	17109		RunNo:	23522				
Prep Date:	1/7/2015		Analysis Date:	1/8/2015		SeqNo:	694946		Units: mg/L		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Selenium	0.48	1.0	0.5000	0	95.3	80	120			J	

Qualifiers:

* Value exceeds Maximum Contaminant Level.
E Value above quantitation range
J Analyte detected below quantitation limits
O RSD is greater than RSDlimit
R RPD outside accepted recovery limits
S Spike Recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
P Sample pH greater than 2.
RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1501149

12-Jan-15

Client: Navajo Refining Company
Project: Quarterly WW Effluent Monitoring

Sample ID	MB-17109		SampType:	MBLK		TestCode:	EPA 6010B: Total Metals				
Client ID:	PBW		Batch ID:	17109		RunNo:	23522				
Prep Date:	1/7/2015		Analysis Date:	1/8/2015		SeqNo:	694914		Units: mg/L		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Selenium	ND	0.050									

Sample ID	LCS-17109		SampType: LCS		TestCode: EPA 6010B: Total Metals					
Client ID:	LCSW		Batch ID: 17109		RunNo: 23522					
Prep Date:	1/7/2015		Analysis Date: 1/8/2015		SeqNo: 694915		Units: mg/L			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Selenium	0.48	0.050	0.5000	0	95.3	80	120			

Qualifiers:

- | | |
|---|--|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH greater than 2. |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |

Sample Log-In Check List

Client Name: NAVAJO REFINING COM

Work Order Number: 1501149

RcptNo: 1

Received by/date:

Logged By:

Lindsay Mangin

1/7/2015 9:45:00 AM

Completed By:

Lindsay Mangin

1/7/2015 10:26:15 AM

Reviewed By:

Chain of Custody

1. Custody seals intact on sample bottles?

Yes ☒

No ☐

Not Present ☐

2. Is Chain of Custody complete?

Yes ☒

No ☐

Not Present ☐

3. How was the sample delivered?

FedEx

Log In

4. Was an attempt made to cool the samples?

Yes ☒

No ☐

NA ☐

5. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C ?

Yes ☒

No ☐

NA ☐

6. Sample(s) in proper container(s)?

Yes ☒

No ☐

7. Sufficient sample volume for indicated test(s)?

Yes ☒

No ☐

8. Are samples (except VOA and ONG) properly preserved?

Yes ☒

No ☐

9. Was preservative added to bottles?

Yes ☐

No ☒

NA ☐

10. VOA vials have zero headspace?

Yes ☐

No ☐

No VOA Vials ☒

11. Were any sample containers received broken?

Yes ☐

No ☒

12. Does paperwork match bottle labels?

Yes ☒

No ☐

(Note discrepancies on chain of custody)

13. Are matrices correctly identified on Chain of Custody?

Yes ☒

No ☐

14. Is it clear what analyses were requested?

Yes ☒

No ☐

15. Were all holding times able to be met?

Yes ☒

No ☐

(If no, notify customer for authorization.)

of preserved
bottles checked
for pH:

(<2 or >12 unless noted)

Adjusted? no

Checked by: CS

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order?

Yes ☐

No ☐

NA ☒

Person Notified:

Date:

By Whom:

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding:

Client Instructions:

17. Additional remarks:

18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

Chain-of-Custody Record

Client: Navajo Refining Co.

Mailing Address: P.O. Box 159 Artesia,

NM 88211-0159

Phone #: 575-748-3311

email or Fax#: 575-746-5451

QA/QC Package:

☐ Standard

☐ Other _____

☐ EDD (Type) _____

☐ Level 4 (Full Validation)

☐ Stand ☐ Rush ☐ Next Day

Project Name:

Quarterly WW Effluent Monitoring

Project #: P.O. # 167796

Project Manager:

Mike Holder / Dan Crawford

Sampler:

On Ice: ☒ Yes ☐ No

Sample Temperature: 1.0°C

Date Time Matrix Sample Request ID

HEAL No. 1501149

Container Type and #

Preservative Type

1 Plastic HNO3

1 Plastic Neat

1 Plastic Neat

1 Plastic Neat

1 Plastic Neat

1 Plastic Neat

1 Plastic Neat

1 Plastic Neat

1 Plastic Neat

1 Plastic Neat

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Total Se by EPA Method 6010B
TCLP Selenium 1311/6010

Remarks: Required to test on the first business day of each month.

(1) Totals method 6010

(2) TCLP 1311/6010

Received by: James Potts Date: 01/07/15 Time: 0945

Received by: _____ Date: _____ Time: _____

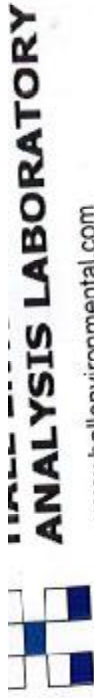
Relinquished by: _____

Relinquished by: _____

Date: 1/3/15 Time: 10:00

Date: _____ Time: _____

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly indicated on the analytical report.



ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request