

GW – 028

**PERMITS,
RENEWALS &
MODS**

2018



State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 24, 2018

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

**RE: LETTER OF CONCURRENCE FOR THE INJECTION
STANDARDS FOR THE PROPOSED GROUNDWATER
RECOVERY AND REINJECTION SYSTEM UPGRADE
HOLLYFRONTIER NAVAJO REFINING LLC - ARTESIA REFINERY
EPA ID NO. NMD048918817
HWB-NRC-MISC**

Dear Mr. Denton:

The New Mexico Environment Department (NMED) and the New Mexico Energy Minerals and Natural Resources Department's Oil Conservation Division (OCD) participated in a conference call with HollyFrontier Navajo Refining LLC (the Permittee) and AMEC Foster Wheeler on April 26, 2018. The purpose of the call was to discuss a proposed Groundwater Recovery and Reinjection System Upgrade. NMED and OCD requested the Permittee provide a conceptual design outlining the proposed treatment process so the agencies could establish the cleanup levels for the treated water reinjected into the Western and Eastern Injection Galleries. The agencies received an e-mail from HollyFrontier on May 15, 2018 that provided a summary of the meeting, a block flow diagram with the conceptual design for the proposed treatment process and a process narrative. Upon review of this additional information, NMED and OCD agree on the following injection standards dependent upon the proposed injection locations:


1. Western Injection Gallery: NMED and OCD require only nonhazardous water (i.e., not characteristic for hazardous constituents per Table 1 of 40 CFR 261.24) and water that does not contain phase separated hydrocarbons may be reinjected into the western

injection gallery. Both agencies agree that the groundwater cleanup standards (screening levels established in the existing and current draft RCRA Permits and 20.6.2.3103 NMAC) do not have to be met for reinjection into the western injection gallery.

2. Eastern Injection Gallery: NMED and OCD require all treated water meet the NMED and OCD cleanup standards in accordance with Section 4.1.1.a of the existing RCRA Post-Closure Permit, the applicable cleanup levels listed in NMED's 2017 Risk Assessment Guidance for Site Investigation and Remediation, Section IV.D.1 of the Draft RCRA Permit, and 20.6.2.3103 NMAC for organics.
3. With these injection requirements in mind, HollyFrontier must submit to the OCD an application for major modification of the existing Discharge Permit (GW-28) administered by the OCD. The injection program cannot proceed until the permit modification process is complete and a modified permit is formally approved.

If you have any questions regarding this letter, please contact Leona Tsinnajinnie at (505) 476-6057.

Sincerely,



John E. Kielling
Bureau Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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