

GW - _____028_____

**INSPECTIONS &
DATA 2**

2006 - Present

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, June 16, 2011 11:19 AM
To: 'Moore, Darrell'; Cobrain, Dave, NMENV
Cc: Monzeglio, Hope, NMENV
Subject: RE: NRS Detailed Area Piping Plan Drawings

Darrell:

The OCD is in receipt of the engineering pipeline drawings for the waste water system. The OCD approved the tank upgrades with conditions on May 3, 2011.

Based on the attached drawings, the new tanks appear to be: Tk-0829, Tk-836, Tk-49 (solvent extraction tank), Frac Tank (Dwg: 80-1-201-D-04), Tk-803, Tk-804, Tk-1, Tk-2, Tk-3, Tk-4, Tk-807,.....

Dwg: 80-1-201-D-02 depicts a 300 GALLON POLYMER MIX TANK, which must also meet the design and construction requirements of the permit.

OCD requests that Navajo provide the listing of all new tanks (which include Frac Tanks?) installed at the facility so the OCD can inspect the locations for compliance with the permit.

Thank you.

File: GW-028: "Inspections" and "Permit Modification" Thumbnails

Carl J. Chavez, CHMM
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"Why not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward with the Rest of the Nation?" To see how, go to "Pollution Prevention & Waste Minimization" at:
<http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>)

From: Moore, Darrell [<mailto:Darrell.Moore@hollycorp.com>]
Sent: Wednesday, June 15, 2011 9:39 AM
To: Chavez, Carl J, EMNRD; Cobrain, Dave, NMENV
Cc: Monzeglio, Hope, NMENV
Subject: FW: NRS Detailed Area Piping Plan Drawings

Carl, Dave and Hope

Attached, please find detailed piping and other drawings for our upgrade of our Waste Water System. We had sent you the drawings for the tanks for this system a few weeks ago.

From: Siwek, Janusz
Sent: Thursday, June 09, 2011 9:49 PM
To: Moore, Darrell
Cc: McKee, Michael; Meeks, Jimmy; Evans, Jason
Subject: FW: NRS Detailed Area Piping Plan Drawings

From: Holmes, Don P. [holmesdp@cdm.com]
Sent: Thursday, June 09, 2011 5:18 PM
To: Siwek, Janusz; Cline, Jim; Davis, Gary
Cc: Christiansen, John A.
Subject: NRS Detailed Area Piping Plan Drawings

Please find attached the 16 drawings noted above. These drawings are not complete, but do define where all the equipment is located and how about 85% of the piping is located. These should be useful on your OCD permit request.

Lagenia, Please send an office transmittal to document this and post these drawing on the e-Room. Do not attach these drawings again to the official Transmittal.

Don P. Holmes, P.E.
Sr. Project Manager
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October 8, 2009

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr.,
Santa Fe, New Mexico 87505

**RE: Response to OCD Inspections of February 19-20, 2007 and March 13, 2008
Navajo Refining Company (GW-028)**

Carl,

Our responses to your inspection e mails from September 8, 2009 are included in the following letter. Your question are followed by our response in **bold** type.

For the February 19-20, 2007 inspection, our responses are as follows:

1) Required automated free-product recovery system at KWB-8 location to remove point source of contamination from GW 24/7 & prevent expansion of plume into pecan orchard at 2/19/2007 Close Out Inspection Meeting.

*** Recovery system is in place. The product is pumped back to the refinery API along with the fluids from our Bolton Road recovery trenches.**

2) Flush mount recovery and monitor wells were not locked and were accessible to public. Need locks to prevent access.

*** Wells are locked.**

3) Tank 437 oil leakage to ground on E side from crude oil transfer pump w/ cleanup & secondary containment needed under pump. Cleanup needed (see photos).

*** See item 12 on March 13, 2008 Inspection. "Former Tank 437 moved to new location and oil contamination from leaky crude oil transfer pump cleaned up from OCD 2/19/2007 Close-Out Meeting Inspection?"**

4) Old API Separator at S. Plant removed and replaced w/ Rose Unit (32.84402 - 104.39280), which OCD was not notified of a modification for new process area. Permit modification request violation of permit.

***While its true that Navajo did not notify OCD of the ROSE Unit, we were unaware that we were required to. OCD has been notified of all subsequent new units and tanks. Further, OCD has been sent all drawings relating to new units.**

5) Chemical totes and drums (1993; 3264; 3261; 3265, 1993; 2924; 3266 & 2693) stored on ground throughout refinery in violation of permit. Operator claims construction of impermeable centralized dual storage area in progress to address this violation.

***The new chemical storage pad has been completed**

6) Gas Company of NM Yard stored drums of FCC dispersant, spent catalysts, T610 Solvent; spent catalyst prop media stored > 180 days is a waste storage violation. Empty chemical totes stored on ground is a violation. Operator claimed they were triple rinsed before storage. Incorporate triple rinse into permit renewal to store rinsed empty containers in impermeable areas?

***The spent catalyst in this area has been disposed. The TG-10 solvent is being evaluated and will either be moved to the chemical storage pad or disposed of.**

7) S plant OAPI Separator removed & Rose Unit installed. Failure by operator to notify OCD of Rose Unit installation as "Modification" request under permit.

***See item #4 above**

8) OCD inquired about diesel treatment area fire on 11/1/2006 at 13:30 that was not reported as a major release under a C-141 Form to the OCD. This is a violation to reporting under the permit.

***At the time of this inspection, Navajo didn't realize that fires needed to be reported to OCD since they were already being reported to NMED. We are now reporting all fires to OCD.**

9) Tank 419 flow-back not repaired per last OCD inspection requirement.

*** Tank 419 Flow back has been repaired**

10) Chemical drums and totes containing chemicals were not stored in impermeable pad(s). Operator indicated centralized chemical storage area was under construction to facilitate storage & inquired about triple-rinse cleaning procedure on empty drums and totes to store on ground for new discharge permit.

*** See item #5 above.**

11) There was a pipeline leak noticed SW of Tank 63 (32.85097 -104.39596) that needs to be cleaned up and fixed. It appears to be contaminated steam water. Fix source and cleanup spill.

*** Leak has been fixed..**

12) Steam line leak at Carbon Black Oil Tank 18 in need of repair.

*** T-18 is out of service, however there is a steam leak north west of T-18 under the pipe rack/bed. We have put in a work order to have this repaired.**

13) Leaky pump between Tanks 58 & 59 with stained soils in need of cleanup & pumps in need of repair. Noticed open vessel with oil near pump (32.85028 - 104.39606).

*** The pump area was cleaned up and the pump repaired.**

14) Leak stains noticed on Tanks 58 sidewall & 59 leaky bottom needs cleanup & investigation.

*** T-58 is open, empty, and out of service and T-59 is also out of service and empty.**

15) Hazardous wastes casks/dumpster noticed on ground- no secondary containment. Secondary containment needed in the hazardous waste storage area.

***We are keeping all hazardous waste on the bundle pads except in instances (such as a tank cleaning) where we generate dozens of boxes in a few days time. When we have these major cleaning episodes, we would need a 10 acre cement pad to hold all the boxes.**

16) Secondary containment needed around all crude oil transfer pump locations without secondary containment

***We have a program in place to put secondary containment around all 32 such pumps. That program will be completed by the end of 2010.**

For the March 13, 2008 inspection, our responses are as follows:

1) Flush mount recovery and monitor wells were not locked and were accessible to public. Locks were not installed from 2/19/2007 Close Out Inspection Meeting.

*** Locks are in place**

2) Cleanup and investigate source of leak on Tank 815.

*** The tank has been repaired. It also had a badly engineered sampling port(s). It has been redone. And the spill cleaned up.**

3) Tank 814 leak needs to be cleaned up and investigated.

*** T-814 has been cleaned, however there are new leaks from valves that have been written up, and the pump on the south west side has been leaking.**

4) Certify Tank 815 w/ fractured concrete ring base is fit for continued service by PE or decommission tank due to safety and environmental hazard risk.

*** The ring base was certified by a PE and that report was sent to OCD**

5) New Sulfur Recovery Units are located E of Tank 57, but OCD was not notified under a "Modification" to the permit.

***OCD was sent drawings of all new construction of the plant AFTER the ROSE Unit. Navajo waited on a response from OCD that never came. We then emailed OCD about their approval of our drawings and were told by OCD that "our only purpose in reviewing the drawings is to help you in making sure you are abiding by the permit conditions. It is not our intent to approve or disapprove any process. So if you feel comfortable in proceeding in the building the units then proceed. Just keep in mind things like curb and pad and secondary containment issues, underground piping designed so they can be pressured tested etc. Wayne Price email 2/19/08**

6) Five RWs on S Bolton Rd. tied into KWB-8 recovery system with activation expected within next quarter?

*** This has been completed.**

7) Former Tank 437 moved to new location and oil contamination from leaky crude oil transfer pump cleaned up from OCD 2/19/2007 Close-Out Meeting Inspection?

*** Tank 437 was moved and all contamination cleaned up. Further, the leaking pump near the tank that was sitting outside the containment was removed.**

8) Secondary containment under crude oil transfer pumps status?

*** This has been completed.**

9) Cat fine drums in bundle cleaning area need to be stored in the newly constructed chemical storage area.

* Cat fine drums have been disposed of.

17) Hazardous waste container storage area requires similar impermeable pad storage area.

***See item #15 in previous inspection for comments**

If there are any questions regarding this submission, please do not hesitate to contact me at 575-746-5281.

Sincerely,
NAVAJO REFINING COMPANY, LLC

A handwritten signature in black ink that reads "Darrell Moore". The signature is written in a cursive, flowing style.

Darrell Moore
Environmental Manager for Water and Waste

File: 5E4B OCD Discharge Permit GW-028