

**UIC - I - 8 - 1**

**ENFORCEMENT**

**2015 - Present**

## Chavez, Carl J, EMNRD

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**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](mailto: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](http://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](http://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 in a cursive style.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

**Hall Environmental Analysis Laboratory, Inc.**

**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
<b>EPA 6010B: TOTAL METALS</b>							Analyst: <b>ELS</b>	
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.

<b>Qualifiers:</b>	* 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.**

**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
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>ELS</b>	
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.

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

Sample ID	<b>LCS-18524</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA 6010B: Total Metals</b>					
Client ID:	<b>LCSW</b>	Batch ID:	<b>18524</b>	RunNo:	<b>25294</b>					
Prep Date:	<b>4/3/2015</b>	Analysis Date:	<b>4/4/2015</b>	SeqNo:	<b>747890</b>	Units:	<b>mg/L</b>			
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.        | 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 |  |

**Sample Log-In Check List**

Client Name: **NAVAJO REFINING CO** Work Order Number: **1504137** RcptNo: **1**

Received by/date: [Signature] 04/03/15

Logged By: **Lindsay Mangin** 4/3/2015 9:22:00 AM [Signature]

Completed By: **Lindsay Mangin** 4/3/2015 9:51:32 AM [Signature]

Reviewed By: [Signature] 04/03/15

**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° C to 6.0°C Yes  No  NA   
Approved by client.
- 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: 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 °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	14.9	Good	Yes			



## Chavez, Carl J, EMNRD

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**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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# HOLLYFRONTIER.

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:<sup>1</sup>

- 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.

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<sup>1</sup> 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 <sup>1</sup>	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

<sup>1</sup> 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
		(gpm)	Total Se (ppm)	TCLP Se (ppm)	Total Se (ppm)	TCLP Se (ppm)	On Total Se
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
DATE	Laboratory		Total Se (ppm)	TCLP Se (ppm)	Total Se (ppm)	TCLP Se (ppm)	On Total Se -
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 (gpm)	SeRT Influent		SeRT Effluent		Removal Efficiency
DATE	Laboratory		Total Se (ppm)	TCLP Se (ppm)	Total Se (ppm)	TCLP Se (ppm)	On Total Se -
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 <sup>1</sup>	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%

<sup>1</sup> 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.<sup>2</sup>

**June 30 to July 2, 2014**

- Navajo temporarily stopped injection while doing the PFOTs and MIT for Well 2.<sup>2</sup>

**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.<sup>2</sup>

**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

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<sup>2</sup> 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.<sup>3</sup>

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 4<sup>th</sup> quarter 2014 quarterly sample was taken on October 1, 2014 and the 1<sup>st</sup> 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 1<sup>st</sup> 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

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<sup>3</sup> As explained in the September 30<sup>th</sup> 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 <sup>2</sup>
10/24/2013 <sup>1</sup>	T-801 Effluent	ALS Environmental	SW1311/ 6020	0.82	0.78
		Hall Environmental	EPA 6010B	0.74	
10/28/2013 <sup>1</sup>	T-801 Effluent	Hall Environmental	EPA 6010B	0.98	0.98
11/4/2013 <sup>1</sup>	Injection Well Effluent Sampling Point	Hall Environmental	EPA 6010B	1.10	1.10
11/11/2013 <sup>1</sup>	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 <sup>3</sup>	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 <sup>4</sup>	T-801 Effluent to Wells	Hall Environmental	EPA6010B	0.08	0.08
7/3/2014 <sup>4</sup>	T-801 Effluent to Wells	Hall Environmental	EPA6010B	< 0.027	< 0.027
10/1/2014 <sup>4</sup>	T-836 Effluent to Wells	Hall Environmental	EPA6010B	0.04	0.04
1/2/2015 <sup>4</sup>	T-801 Effluent to Wells	Hall Environmental	EPA6010B	< 0.027	< 0.027

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

<sup>2</sup>For split samples.

<sup>3</sup>Digestion procedure and sample processing altered as described above.

<sup>4</sup>Required 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.<sup>4</sup> 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.<sup>5</sup> 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.

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<sup>4</sup> 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.

<sup>5</sup> 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](mailto: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,

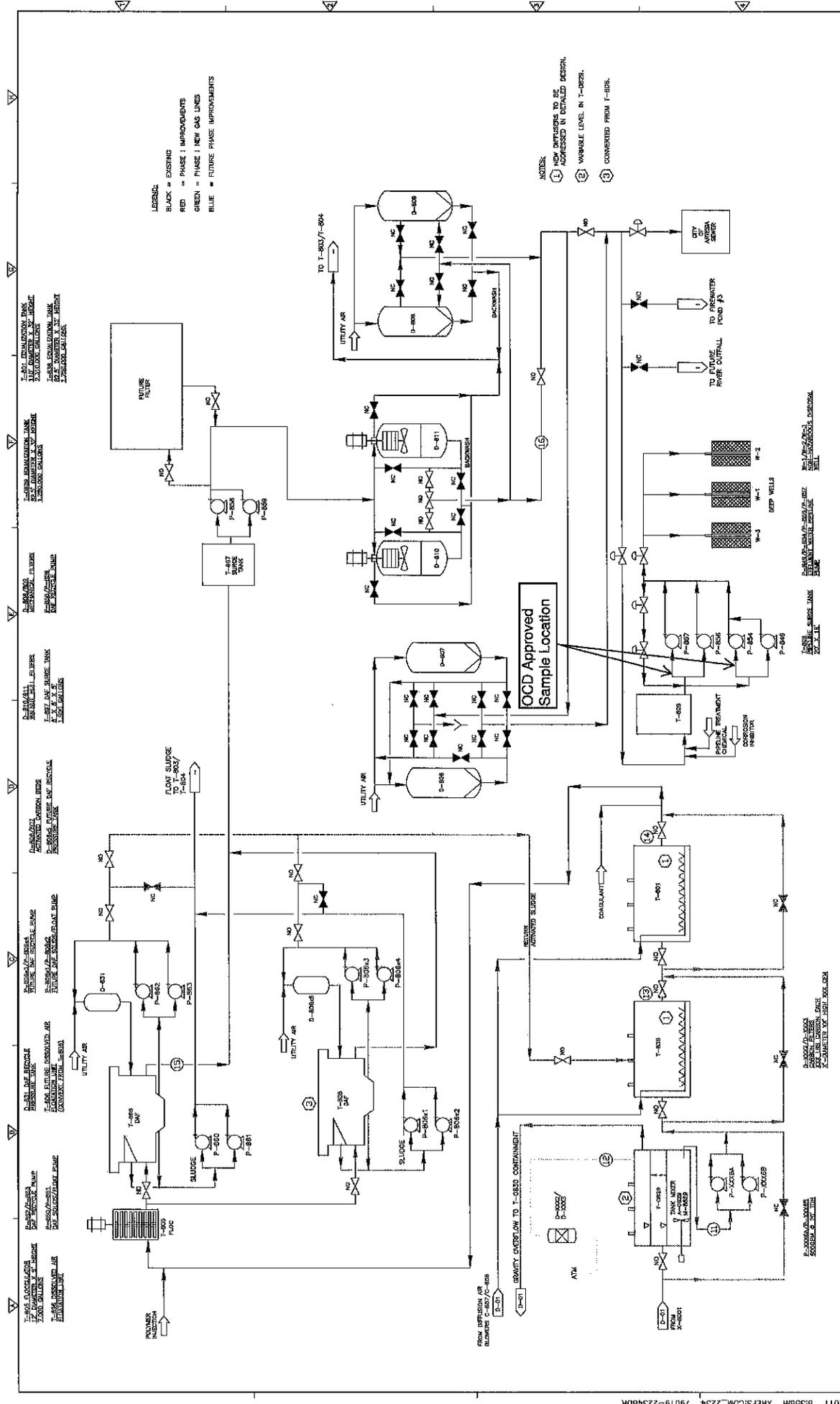
Brian Stone

Brian Stone  
Environmental Specialist

Navajo Refining Company, L.L.C.

**Attachment A:**  
**OCD-Approved Sample Location**

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LEGEND:  
 BLACK = EXISTING  
 RED = PHASE 1 IMPROVEMENTS  
 GREEN = PHASE 1 NEW GAS LINES  
 BLUE = FUTURE PHASE IMPROVEMENTS

NOTES:  
 ① NEW DIFFUSERS TO BE ADDED IN DETAILED DESIGN.  
 ② VARIABLE LEVEL IN T-020A.  
 ③ CONNECTED FROM T-006.

1. 100% FLOW TO T-807  
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 190. 100% FLOW TO T-996  
 191. 100% FLOW TO T-997  
 192. 100% FLOW TO T-998  
 193. 100% FLOW TO T-999  
 194. 100% FLOW TO T-1000

PROJECT NO. 00338-79019 FILE NAME: 0001PFD SHEET NO. D-02	
PHASE 1 - WASTEWATER TREATMENT PLANT IMPROVEMENTS - SHEET 2 EQUALIZATION TANK TO DISCHARGE	
NAVAJO REFINERY ARTESIA, NEW MEXICO PHASE 1 WWTP	
CDM CONSULTANTS 10000 RIVER ROAD, SUITE 200 DALLAS, TEXAS 75244 PHONE: 972.968.6600 FAX: 972.968.6601 WWW.CDM.COM	
PREPARED BY: L. CARMAN CHECKED BY: R. MOORE DESIGNED BY: S. GREENGLASS DRAWN BY: M. GERRILLA APPROVED BY: J. BROWN DATE: 08/28/2013	REVISIONS 5. 01/13 JAC JAC ISSUED FOR PMA REVIEW 4. 12/11 RM JAC CHANGED PER 12/07/10 REVIEW MEETING 3. 12/11 RM JAC CHANGED PER 11/25/10 REVIEW MEETING 2. 10/23 JAC CHANGED DURING CLIENT REVIEW MEETING 1. 10/23 JAC CHANGED PER CLIENT 12/28/10 MEETING

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

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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](http://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](http://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,

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.****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
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: ELS	
Selenium	ND	0.027	0.050		mg/L	1	1/8/2015 6:21:27 AM	17109
<b>EPA 6010B: TOTAL METALS</b>							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.

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

Sample ID <b>LCS-17109</b>	SampType: <b>LCS</b>	TestCode: <b>EPA Method 6010B: TCLP Metals</b>								
Client ID: <b>LCSW</b>	Batch ID: <b>17109</b>	RunNo: <b>23522</b>								
Prep Date: <b>1/7/2015</b>	Analysis Date: <b>1/8/2015</b>	SeqNo: <b>694946</b>	Units: <b>mg/L</b>							
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	<b>MB-17109</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA 6010B: Total Metals</b>					
Client ID:	<b>PBW</b>	Batch ID:	<b>17109</b>	RunNo:	<b>23522</b>					
Prep Date:	<b>1/7/2015</b>	Analysis Date:	<b>1/8/2015</b>	SeqNo:	<b>694914</b>	Units:	<b>mg/L</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Selenium	ND	0.050								

Sample ID	<b>LCS-17109</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA 6010B: Total Metals</b>					
Client ID:	<b>LCSW</b>	Batch ID:	<b>17109</b>	RunNo:	<b>23522</b>					
Prep Date:	<b>1/7/2015</b>	Analysis Date:	<b>1/8/2015</b>	SeqNo:	<b>694915</b>	Units:	<b>mg/L</b>			
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

ReptNo: 1

Received by/date: CS 01/07/15

Logged By: Lindsay Mangin 1/7/2015 9:45:00 AM *Judy Mangin*

Completed By: Lindsay Mangin 1/7/2015 10:26:15 AM *Judy Mangin*

Reviewed By: *JG/TO* 01/07/15

**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° 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? (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 °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**

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**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	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 <sup>1</sup>	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 <sup>3</sup>	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 <sup>4</sup>	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 <sup>4</sup>	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 <sup>4</sup>	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 <sup>4</sup>	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.

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

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

<sup>3</sup> 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.

<sup>4</sup> 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**

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

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DATE	Laboratory	SWS Residue (W-50)		DMS Residue (W-50)		Dioxin Effluent (W-7)	Salt Food (W-7)	Sulfur Eff. (W-7)	Wet Gas scrubber (W-7)	Dioxin Outlet (W-50)	Dioxin Outlet (W-50)	AP Inlet		AIR Outlet		T-502		T-505		T-505 Eff. (%)	DM Eff. (%)	Wafinat Eff. (%)	Relaction Work Eff. (%)	Steam Tank (W-50)	T-520	Lock 46 Motor (W-521)	UNIT 44 Overhead Stripper	Unit 64 Misc Cod Separator	NO Project	Lab Report	
		Result	Avge	Result	Avge							Result	Avge	Result	Avge	Result	Avge	Result	Avge												Result
11/19/2013	Hall	2.00	2.00	1.80	1.80	-	-	-	-	-	-	0.15	-	1.20	1.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311959
11/19/2013	Environmental	1.70	1.70	-	-	-	-	-	-	-	-	0.14	-	0.95	0.95	-	-	-	-	-	-	-	-	0.08	0.22	0.38	-	-	-	1311462	
11/19/2013	CHRM HILL ASL	-	-	-	-	-	-	-	-	-	-	-	-	1.57	1.57	-	-	-	-	-	-	-	-	-	-	-	-	-	-	M9259	
11/19/2013	Environmental	1.60	1.60	1.60	1.60	-	-	-	-	-	-	0.15	-	1.10	1.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311625	
11/26/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311693	
11/27/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311694	
11/18/2013	Environmental	2.70	2.70	2.80	2.80	-	-	-	-	-	-	0.43	-	0.72	0.72	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311743	
11/19/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311742	
11/20/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311692	
11/20/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311693	
11/21/2013	Environmental	3.30	3.30	3.30	3.30	-	-	-	-	-	-	0.36	0.63	0.65	0.65	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311870	
11/22/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311871	
11/29/2013	Environmental	0.86	0.86	1.10	1.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311450	
11/24/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311806	
11/25/2013	Environmental	3.30	3.30	3.10	3.10	1.90	1.90	-	-	-	-	0.50	0.50	0.65	0.65	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311806	
11/26/2013	Environmental	2.10	2.10	3.20	3.20	0.39	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311806
11/27/2013	Environmental	2.90	2.90	2.80	2.80	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311897
11/28/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311899
11/29/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311899
11/30/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1311899
12/1/2013	Environmental	3.20	3.20	3.20	3.20	-	-	-	-	-	-	0.37	0.63	0.82	0.82	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312046
12/5/2013	Environmental	-	-	2.30	2.30	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312046
12/8/2013	Environmental	3.00	3.00	3.10	3.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312225
12/12/2013	Environmental	3.70	3.70	3.40	3.40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312228
12/16/2013	Environmental	4.20	4.20	4.20	4.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312315
12/19/2013	Environmental	3.50	3.50	3.90	3.90	-	-	-	-	-	-	0.89	0.99	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312315
12/25/2013	Environmental	4.80	4.80	4.60	4.60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312548
12/26/2013	Environmental	5.80	5.80	5.70	5.70	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686
12/27/2013	Environmental	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312687
12/30/2013	Environmental	3.90	3.90	5.90	5.90	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1312686











## Chavez, Carl J, EMNRD

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**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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Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [www.hallenvironmental.com](http://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](http://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 in a cursive style.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

**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
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>ELS</b>	
Selenium	ND	0.027	0.050		mg/L	1	1/8/2015 6:21:27 AM	17109
<b>EPA 6010B: TOTAL METALS</b>							Analyst: <b>ELS</b>	
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.

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

Sample ID <b>LCS-17109</b>	SampType: <b>LCS</b>		TestCode: <b>EPA Method 6010B: TCLP Metals</b>							
Client ID: <b>LCSW</b>	Batch ID: <b>17109</b>		RunNo: <b>23522</b>							
Prep Date: <b>1/7/2015</b>	Analysis Date: <b>1/8/2015</b>		SeqNo: <b>694946</b>		Units: <b>mg/L</b>					
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	<b>MB-17109</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA 6010B: Total Metals</b>					
Client ID:	<b>PBW</b>	Batch ID:	<b>17109</b>	RunNo:	<b>23522</b>					
Prep Date:	<b>1/7/2015</b>	Analysis Date:	<b>1/8/2015</b>	SeqNo:	<b>694914</b>	Units:	<b>mg/L</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Selenium	ND	0.050								

Sample ID	<b>LCS-17109</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA 6010B: Total Metals</b>					
Client ID:	<b>LCSW</b>	Batch ID:	<b>17109</b>	RunNo:	<b>23522</b>					
Prep Date:	<b>1/7/2015</b>	Analysis Date:	<b>1/8/2015</b>	SeqNo:	<b>694915</b>	Units:	<b>mg/L</b>			
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:

*CS* 01/07/15

Logged By:

Lindsay Mangin

1/7/2015 9:45:00 AM

*Judy Mangin*

Completed By:

Lindsay Mangin

1/7/2015 10:26:15 AM

*Judy Mangin*

Reviewed By:

*JM/TO*

01/07/15

**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° 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: 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 °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			

