



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

March 25, 2019

CERTIFIED MAIL

Steven Moyer
Environmental Manager
HollyFrontier Tulsa Refinery LLC – West Facility
1700 South Union Avenue, P.O. Box 21001
Tulsa, OK 74121-1001

Re: Resource Conservation and Recovery Act (RCRA) Part B Permit Application
HollyFrontier Tulsa Refinery LLC – Tulsa West Refinery (HFTRW)
EPA ID# OKD058078775

Notice of Deficiency (NOD)

Dear Mr. Moyer:

The Oklahoma Department of Environmental Quality Land Protection Division (DEQ) received the above referenced permit application (Application) on December 3, 2018. DEQ has completed an Administrative Review and has found the Application to be deficient in the following areas:

1. In Figure 1-1, the topographic map shows the gates of the facility but the fences are not visible as part of access control for the facility. Please update the topographic map showing Access Control (fences) as required by 40 CFR 270.14(b)(19) (viii).
2. HFTRW has submitted a Land Treatment Unit (LTU) evaluation work plan dated December 7, 2018. HFTRW has not yet completed the sampling at the LTUs. Technical review on this item cannot commence until HFTRW submits LTU sampling data as required by 40 CFR 264.280 in support of the request for termination of Post Closure Care (PCC).
3. Justification for Permit Modification Request: HFTRW listed several permit modification requests in Table 1-1. In the fourth (4th) column of Table 1-1, "Justification", HFTRW only added federal regulations related to the requested permit modifications. The following permit modification requests require further justifications.
 - (i) Reduce Groundwater Monitoring Target Analyte List: On page 8-3, Section 8.2, HFTRW stated, "the COCs were selected by analyzing the historical data set and

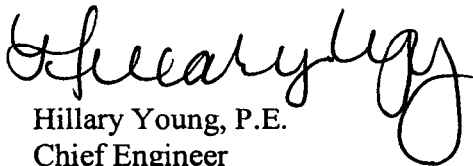
removing analytes that were not detected or were detected at least less than 10% frequency.” Please provide justification of this 10% threshold value for the analyte list modification.

- (ii) Reduction of the PCC Period of the LTUs to ten (10) years: In the “Justification” column, the application states, “40 CFR 270.42 Appendix I.E.3.” The regulatory reference is not a justification for the requested permit modification; instead it classifies the requested permit modification as a Class 3 Permit Modification. Please provide the justification for the permit modification request.
- (iii) Removal of Notification Requirements for Solid Waste Management Unit (SWMU) 10 (Waste Water Treatment Plant): HFTRW stated in the purpose column that SWMU 10 is an operational unit but did not include any justification for removal of notification requirements. As discussed in March 14, 2019 meeting, DEQ understands that removal of notification requirement will streamline and expedite the operation and maintenance of an active unit such as SWMU 10. Please include the justification in the permit application.

This NOD does not reflect the adequacy of the technical aspects of the application. A full technical review will be completed once we have received an administratively complete application.

Please submit a response within sixty (60) days of receiving this NOD. Please direct any questions or comments you may have to Orphius Mohammad at (405) 702-5118, or by email at Orphius.Mohammad@deq.ok.gov.

Sincerely,



Hillary Young, P.E.
Chief Engineer
Land Protection Division