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SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

February 3, 2015

CERTIFIED MAIL

Andrew J. Haar, Environmental Manager
Holly Refining and Marketing, Tulsa LLC.
1700 South Union Avenue, P.O. Box 21001
Tulsa, OK 74121-1001

Re: RCRA Part B Post Closure and Corrective Action Permit Application
Holly Tulsa East Refinery
EPA ID# OKD990750960

Dear Mr. Haar:

On September 11, 2013 The Oklahoma Department of Environmental Quality Land Protection Division (DEQ) issued a Notice of Deficiency (NOD) to Holly regarding its application of bio-sludge onto the closed Land Treatment Units (LTUs). On September 30, 2014, DEQ received a response (dated May 13, 2014) from Holly to the NOD by email (the hard copy of the original letter was never received).

It is noted that Holly asked for one year to evaluate different options and finalize the method to manage bio-sludge. As mentioned in the September 11, 2013 NOD, applying bio-sludge onto a closed LTU is not authorized in the permit and this position was reiterated during a December 15, 2014 meeting between Holly and DEQ. Holly is required to clarify the option they want to adopt to manage bio-sludge during that one year period.

If Holly wishes to continue applying bio-sludge to the LTU it must request rescission of the closure of the LTU under the Post Closure Permit in order to allow continued sludge application under the terms of §40 CFR 264.113(d). If Holly wishes to not rescind the closure of the LTU it should cease applying the bio sludge to the unit. Within thirty (30) days from your receipt of this letter please present to DEQ your preferred course of action.

On January 19, 2015, DEQ also received a letter regarding analytical data for the bio solids being applied to LTU. The data mentioned in the letter was missing and only received by DEQ on February 2, 2015; that data is still being reviewed.



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Another outstanding NOD item was the Part A application. The Holly response letter stated Attachment 1 contained the Part A Application; however it was not included in the email. Please submit Attachment 1 containing a current Part A application within thirty (30) days from your receipt of this letter.

Please direct any questions or comments you may have to Orphius Mohammad at (405) 702-5118, or by E-Mail at Orphius.Mohammad@deq.ok.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hensch". The signature is written in a cursive style with a large initial "D".

Donald A. Hensch, P.E.
Engineering Manager
RCRA Permits and Corrective Actions Section
Land Protection Division