UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TX 75270

December 3, 2019

CERTIFIED MAIL 7007 3020 0000 1523 1380 RETURN RECEIPT REQUESTED

Mr. Kevin D. Bogard
Vice President
Blanchard Refining Company LLC
Galveston Bay Refinery
Marathon Petroleum Company LP
P. O. Box 401
Texas City, TX 77590-8349

RE: Blanchard Refining Company LLC (Blanchard) Final Petition Reissuance Decision for Wells WDW-80, 127, and 128.

Dear Mr. Bogard:

The land disposal restrictions prohibit the injection of hazardous waste unless a petitioner can demonstrate to EPA, to a reasonable degree of certainty, that there will be no migration of hazardous constituents from the injection zone for as long as the wastes remain hazardous. The land disposal restrictions for injection wells codified in 40 CFR Part 148 provide the standards and procedures by which petitions to dispose of an otherwise prohibited waste by injection will be reviewed and by which exemptions pursuant to these petitions will be granted or denied. Part 148 also provides for the reissuance of an exemption if the reissuance complies with the above-mentioned standards.

A letter dated 9/23/19 informed Blanchard that EPA was proposing to approve its petition reissuance request for an exemption to the land disposal restrictions. The public comment period associated with this decision began on September 30, 2019, and closed on November 15, 2019, and no comments were received.

Based on a detailed technical review of the petition reissuance request and support documents, EPA has determined that this information for the Blanchard site meets the requirements of 40 CFR Part 148 by demonstrating that, to a reasonable degree of certainty, there will be no migration of hazardous constituents from the injection zone for 10,000 years.

The following are conditions of this land disposal restrictions exemption.

Final Petition Reissuance Approval Conditions

This approval of a petition for reissuance of an exemption to allow the injection of restricted hazardous wastes is subject to the following conditions, which are necessary to assure that the standard in 40 CFR §148.20(a) is met. Noncompliance with any of these conditions is grounds for termination of the exemption in accordance with 40 CFR §148.24(a)(1). This exemption is applicable to the Blanchard injection wells: WDW-80, 127 and 128, located at the Blanchard refinery in Texas City, TX.

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1. Injection of restricted hazardous waste shall be limited to the following injection zone and injection intervals:

Well	Injection Zone Depth KB	Injection Interval Depth KB	Perforations Depth KB	Reservoir
WDW-80[1]	3963' - 7547'	5763' - 6415'	6030' - 6220'	Sand 1
WDW-127[2]	4019' - 7604'	5819' - 6498'	5858'- 6045'	Sand 0
WDW-128[3]	4015' - 7600'	5815' - 6469'	6300' - 6450'	Sand 2

[1]WDW-80 depths are referenced to KB depths from 1/11/71 Welex INDUCTION ELECTRIC LOG with a KB of 13' above ground level
[2]WDW-127 depths are referenced to KB depths from the 6/12/75 Schlumberger INDUCTION SPHERICALLY FOCUSED LOG with a KB of 16' above ground level
[3]WDW-128 depths are referenced to KB depths from the 5/12/75 Schlumberger INDUCTION SPHERICALLY FOCUSED LOG with a KB of 16' above ground level

2. The cumulative monthly volume injected into the three wells are limited as follows:

[maximum injection rate in gpm (see below)] x (1440 minutes/day) x (number of days in the month)

Reservoir	Well	Maximum Injection Rate [gallons per minute (gpm)]
Sand 0	WDW-127	575
Sand 1	WDW-80	700
Sand 2	WDW-128	475

3. The facility shall cease injection into WDW- 80, WDW-127, WDW-128, by December 31, 2037.

4. The characteristics of the injected wastestream shall at all times conform to those discussed in Section 3.5 of the 2018 petition reissuance document for WDW- 80, WDW-127, and WDW-128. The density of the wastestream at 20^0 C (or 68^0 F) and 1 atmosphere shall be from 0.9982 to 1.036 g/cm³, with a specific gravity range from 1.000 to 1.038. The density of the wastestream at 15.56^0 C (or 60^0 F) and 1 atmosphere shall be from 1.003 to 1.038 g/cm³, with a specific gravity range from 1.004 to 1.039.

5. The approval for injection is limited to those EPA Waste Codes listed below.

D001	F001	K001	K085	P005	U001	U123
D002	F002	K002	K086	P008	U002	U133
D003	F003	K003	K087	P010	U004	U134
D004	F004	K004	K088	P011	U006	U135
D005	F005	K005	K093	P012	U007	U136
D006	F006	K006	K094	P013	U009	U137
D007	F007	K007	K095	P015	U012	U140
D008	F008	K008	K096	P021	U018	U144
D009	F009	K009	K099	P022	U019	U145
D010	F010	K010	K100	P029	U022	U146
D011	F011	K011	K101	P030	U028	U147
D018	F012	K013	K102	P036	U031	U151
D019	F019	K014	K103	P038	U032	U154
D021	F020	K015	K104	P056	U037	U159
D022	F021	K016	K105	P063	U043	U160

D023	F022	K018	K106	P065	U044	U161
D024	F023	K019	K112	P073	U045	U162
D025	F024	K020	K113	P074	U050	U165
D026	F025	K021	K115	P076	U051	U169
D027	F026	K022	K116	P092	U052	U188
D028	F027	K023	K117	P098	U055	U190
D029	F028	K024	K118	P099	U056	U196
D035	F032	K026	K131	P103	U057	U201
D036	F034	K028	K136	P104	U063	U204
D038	F035	K029	K141	P106	U064	U205
D039	F037	K030	K142	P110	U069	U208
D040	F038	K031	K143	P113	U072	U209
D043	F039	K035	K144	P114	U075	U210
		K036	K145	P115	U077	U211
		K037	K147	P119	U078	U213
		K038	K148	P120	U079	U214
		K040	K149	P121	U080	U215
		K042	K150		U081	U216
		K043	K151		U088	U217
		K046	K156		U092	U220
		K048	K157		U094	U223
		K049	K158		U095	U226
		K050	K159		U101	U227
		K051	K161		U102	U228
		K052	K169		U103	U239
		K060	K170		U107	U359
		K061	K171		U108	
		K062	K172		U110	
		K069	K174		U112	
		K071	K175		U115	
		K073	K178		U117	
		K083			U120	
		K084			U122	

6. The facility must petition for approval to inject additional hazardous wastes which are not included in Condition No. 5 above. The facility must also petition for approval to increase the concentration of any waste which would necessitate the recalculation of the $1x10^{-11}$ limiting concentration reduction factor and the extent of the waste plume. Petition reissuances and modifications should be made pursuant to 40 CFR §148.20(e) or (f).

7. Blanchard shall annually submit to EPA the results of bottomhole pressure surveys for WDW-80, WDW-127, and WDW-128. These surveys shall be performed after shutting in each well for a period sufficient to allow the pressure in the injection interval to reach equilibrium, in accordance with 40 CFR §146.68(e)(1). The annual report should include a comparison of reservoir parameters determined from the falloff test with parameters used in the approved no migration petition reissuance. This should include a comparison of the current year's test results for the static and flowing bottomhole pressures with the values demonstrated in the approved petition reissuance and a comparison of the test results for transmissibility [Kh/μ (mD-ft/cP)] with the transmissibilities used in the approved petition reissuance demonstration for the pressure buildup and 10,000 year plume modeling.

8. Blanchard should compare the model datum (5858' KB) adjusted and skin corrected bottomhole flowing pressure obtained from WDW-127's annual falloff test with the maximum reissuance model flowing bottomhole pressure of 3166.38 psia. The results should be included in Blanchard's annual falloff test report submitted to EPA Region 6. If the test measured and corrected bottom hole pressure is within 20 psia of the maximum reissuance model flowing bottomhole pressure, Blanchard must

immediately notify Region 6 of this condition and engage the Region in discussions as to whether a revision of the pressure buildup model for WDW-127's injection interval will be required through a petition reissuance.

9. Blanchard shall also annually submit to EPA a waste sample report, radioactive tracer survey and annulus pressure test for WDW-80, WDW-127, and WDW-128.

10. Blanchard shall notify EPA in the event that WDW-80, WDW-127, or WDW-128 loses mechanical integrity and prior to any well workover or plugging of WDW-80, WDW-127, or WDW-128. Blanchard should also submit well workover or plugging procedures to EPA for review prior to commencing the work.

11. Upon the expiration, cancellation, reissuance, or modifications of the Texas Commission on Environmental Quality's Underground Injection Control permit(s) for WDW-80, WDW-127, and WDW-128, this exemption is subject to review. A new demonstration may be required if information shows that the basis for granting the exemption is no longer valid under 40 CFR §148.23 and § 148.24.

In addition to the above conditions, this approval for reissuance of a petition for exemption is contingent on the validity of the information submitted in the Blanchard petition reissuance request for an exemption to the land disposal restrictions. This final decision is subject to termination when any of the conditions occur which are listed in 40 CFR § 148.24 including noncompliance, misrepresentation of relevant facts, or a determination that new information shows that the basis for approval is no longer valid.

If you have any questions or comments, please call Brian Graves at (214) 665-7193 or email him at graves.brian@epa.gov.

Sincerely,

Charles W. Maguire
Director
Water Division

ecc: Mr. Robert L. Harris, Blanchard Refining LLC
Mr. Todd Palmer, Blanchard Refining LLC
Ms. Lorrie Council, TCEQ
Mr. Richard Heitzenrater, TCEQ Region 14