

**SUPPLEMENTAL FACT SHEET FOR NPDES PERMIT WA 0002984**  
**PHILLIPS 66 FERNDALE REFINERY**  
**PERMIT MODIFICATION PUBLIC NOTICE**  
**MARCH 10, 2017**

The Department of Ecology issued NPDES Permit No. WA0002984 to the Phillips 66 Ferndale Refinery on March 11, 2014. The permit became effective on April 1, 2014. Condition S12. allows Phillips 66 to petition Ecology to reduce the frequency of groundwater monitoring and the list of constituents monitored after two years (eight quarters) of sampling. On January 24, 2017, Phillips 66 Ferndale Refinery (Phillips 66) submitted a letter to Ecology petitioning to reduce the frequency of groundwater monitoring from quarterly to semi-annually and to remove benzo(a)pyrene (B(a)P) from the list of constituents monitored.

Ecology reviewed Phillips 66's groundwater sampling data for the last ten consecutive quarters, since May 2014. The data shows that the concentrations of most constituents in the groundwater remained relatively stable throughout the ten quarters of sampling. B(a)P was not detected in any monitoring wells during this timeframe. Ecology determined that Phillips 66 has met the requirement of Permit Condition S12. and therefore is qualified for a reduction in groundwater monitoring frequency and a change to the list of constituents monitored.

Ecology has made modifications to the permit in response to the refinery's petition. The proposed changes are discussed in this fact sheet.

**PROPOSED PERMIT CHANGES**

*1. Groundwater Monitoring*

Permit Condition S12. was revised to:

- Reduce the frequency of sampling monitoring wells from **quarterly** to **semi-annually**, including one wet-season and one dry-season sampling event each year.
- Remove B(a)P from the list of constituents monitored.
- Require that sample analysis follow the analytical methods, detection limits, and quantitation limits in Appendix B of the permit.
- Require use of a cleanup procedure (silica gel from Ecology Publication No. ECY 97-602) for performing NWTPH-Dx analysis.
- Require use of EPA Method 300.0 for performing chloride analysis.
- Require that monitoring results be submitted to Ecology within 60 days of sampling.

## PUBLIC INVOLVEMENT INFORMATION

The Department of Ecology has tentatively determined to modify the NPDES permit for the Phillips 66 Ferndale Refinery. The Department will publish a Public Notice of Modification (PNOM) on March 15, 2017 in the *Ferndale Record-Journal* to inform the public that a draft permit modification and fact sheet are available for review.

Interested persons are invited to submit written comments on the draft permit modification. The draft permit modification, supplemental fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the Ecology offices listed below.

Department of Ecology  
Industrial Section  
300 Desmond Drive  
Lacey, WA 98503

Call (360) 407-6916 to make an appointment. Documents are also available online at <https://fortress.wa.gov/ecy/industrial/UIPermit/DraftPermits.aspx>, and at the Ferndale and Bellinham Public Libraries.

Send written comments to:

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Industrial Section  
P.O. Box 47600  
Olympia, WA 98504-7600

E-mail: [liem.nguyen@ecy.wa.gov](mailto:liem.nguyen@ecy.wa.gov)  
Fax: (360) 407-6102

Comments should reference specific text followed by the requested change or concern when possible. **Ecology will only consider comments that pertain to the permit condition we propose to modify.**

The Department will consider all comments received between March 15, 2017 and April 14, 2017, in making a final decision to modify the permit. The Department's response to all significant comments is available on request and will be mailed directly to people who comment on the proposed changes. The Response to Comments will also be posted on the website at the link above.

For more information on this permit, call (360) 407-6955 or write to the address or e-mail listed above. For information in another language, contact Angie Fritz at (360) 407-7393 or [angela.fritz@ecy.wa.gov](mailto:angela.fritz@ecy.wa.gov).

**3<sup>rd</sup> Permit Modification – Response to Comments  
April 16, 2017**

*Public Review*

Ecology placed a Public Notice of Modification in the *Ferndale Record-Journal* on March 15, 2017 to invite comment on the proposed permit modification and supplemental fact sheet. The public comment period ran from March 15, 2017 through April 14, 2017.

Ecology received no comments during the public comment period.