WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID AND HAZARDOUS WASTE DIVISION

FACT SHEET
FOR
A DRAFT PERMIT
FOR
HF SINCLAIR CASPER REFINING LLC
EVANSVILLE, WYOMING
EPA ID NO: WYD048743009

October 30, 2026

A. INTRODUCTION

This Fact Sheet has been prepared by WDEQ pursuant to the Wyoming Department of Environmental Quality's (WDEQ) Hazardous Waste Rules and Regulations (HWRR) Chapter 1 in order to inform the public of the principal facts related to WDEQ's decision to issue a Draft Permit, under the Wyoming Environmental Quality Act, to HF Sinclair Casper Refining LLC (HFS Casper). The Draft Permit is issued under W.S. 35-11-503 of the Environmental Quality Act and WDEQ/HWRR for operation and eventual closure of an on-site hazardous waste surface impoundment known as the "Aggressive Biological Treatment Unit" (ABTU). The Draft Permit also includes corrective action of all Solid Waste Management Units (SWMU), including the ABTU and Areas of Concern (AOC), under WDEQ/HWRR. The Draft Permit is based on HFS Casper's September 1, 2026, Part A Permit Application and Part B Attachments, hereinafter referred to as the Permit Application. The effective date of the Permit Application is September 1, 2026.

B. GENERAL FACILITY DESCRIPTION

The HF Sinclair Casper Refining LLC is an operating petroleum refinery located in an arid area of central Wyoming, near the City of Casper. The small town of Evansville, Wyoming, is located to the west of the refinery, and the Brookhurst Subdivision is located east of the refinery's east boundary.

The refinery includes an on-site operating hazardous waste treatment surface impoundment known as the ABTU. The general construction, operation, groundwater monitoring and subsequent closure procedures for the ABTU are discussed below.

CLEAN-CLOSED UNITS

Three historical hazardous waste management units at the Refinery have been clean-closed: the American Petroleum Institute (API) Separator Ponds and former blowdown pits (ASP), the Primary Effluent Pond (PEP), and the K051 Tank.

The ASP and PEP are historical unlined surface impoundments which, in the past, were

used as part of the Refinery's wastewater effluent system. Closure Certification documentation for the ASP and PEP was submitted to WDEQ on June 27, 2025, and WDEQ acceptance of the Closure Certifications was provided to the Refinery on March 25, 2026.

The K051 Tank was used to store K051 waste that was periodically removed from the API Separator prior to its disposal off-site. Clean closure of the tank was approved by WDEQ on March 12, 2025.

GENERAL DESCRIPTION OF THE ABTU

The ABTU is a dual cell, double-lined surface impoundment which receives refinery wastewater, and is an integral part of the refinery wastewater treatment system. The ABTU was constructed in the spring of 1991 and put into operation by May 2, 1991. Each of the two cells of the ABTU is approximately 152 feet by 214 feet by 13 feet deep. Each cell has approximate capacity of 3.29 acre-feet (1,072,050 gallons), for a total capacity of 6.58 acre-feet (2,144,099 gallons). The ABTU liner and associated leachate collection system meet the minimum technology requirements of WDEQ/HWRR.

The Refinery operates an on-site oil recovery and wastewater treatment system (WWTS) for management of Refinery process wastewater and stormwater collected from the Refinery process areas. The systems are operated in compliance with the regulations, exclusions, and implementing policies of both the Clean Water Act (CWA) and RCRA.

The oily process water and stormwater are oil-bearing hazardous secondary material, which is excluded from the definition of solid waste under 40 CFR 261.4(a)(12)(i) and, therefore, is not regulated under RCRA. The Refinery's on-site oil recovery and process WWTS includes an API Separator, the ABTU, the Evaporation Ponds, and associated intermediate tanks. The oil recovery system consists of units upstream of the ABTU where oil recovery occurs, while the WWTS consists of the ABTU and downstream units (e.g., the Evaporation Ponds), which treats wastewater following oil recovery.

The refinery wastewater entering the ABTU is at times classified as hazardous waste (hazardous waste code D018) under WDEQ/HWRR due to the concentration of benzene. The wastewater is treated in the ABTU by high-rate aeration to enhance biological destruction of organics, including benzene. Aeration rates are continuously maintained at or above 6 horsepower per million gallons of wastewater, and retention time of wastewater in each of the ABTU cells is no more than 5 days. As a result of these operating practices, the ABTU does not, by definition, generate waste codes F037 or F038.

Effluent from the ABTU is below the hazardous threshold level of 0.5 milligrams per liter (mg/l) for benzene and is discharged from the ABTU via a several mile long pipeline to the North Evaporation Ponds located on the north side of the North Platte River. The wastewater entering the evaporation ponds is not a hazardous waste based on the following: 1) the benzene levels are below the regulatory limit of 0.5 mg/l, 2) F037 and F038 are not generated in the ABTU, and 3) F037 and F038 are not present downstream of the ABTU.

HFS Casper plans to clean close the ABTU after the active life of the ABTU has expired. It is anticipated that the refinery will continue operations for the foreseeable future. If HFS

Casper is unable to clean-close the ABTU, then they must apply for a permit modification to include appropriate closure and post-closure requirements.

During the operations of the ABTU, and until clean closure is demonstrated, HFS Casper will continue to monitor groundwater for evidence of a release from the ABTU. Groundwater monitoring requirements are contained in Part XI(A) of the Draft Permit. As stated above, the ABTU is designed and constructed with two liners and a leachate collection system at its base to prevent any releases from the ABTU. There has been no evidence of a leak from the lower liner.

FACILITY-WIDE CORRECTIVE ACTION

The facility has completed the RCRA Facility Investigation, Human Health and Ecological Risk Assessments, Corrective Measures Study, and Corrective Measures Implementation Work Plan. Ongoing corrective action includes operation of the East Boundary Biosparging System and North Boundary Control System, recovery of light non-aqueous phase liquid (LNAPL), observation of the North Platte River for hydrocarbon sheen, and groundwater monitoring associated with corrective measures and monitored natural attenuation.

The corrective action program includes the refinery property, the wastewater pipeline and evaporation ponds north of the North Platte River, and areas to which hazardous wastes or hazardous constituents from the facility could have migrated, including the North Platte River and Brookhurst Subdivision. Requirements are established in Parts XIV, XV, and XVI of the Draft Permit and the referenced Application sections and WDEQ-approved plans.

C. BASIS FOR PERMIT

GENERAL

The ABTU is defined under WDEQ/HWRR as an operating surface impoundment which treats hazardous waste. Therefore, the ABTU is subject to the permitting requirements of W.S. 35-11-503 of the Environmental Quality Act.

ADMINISTRATIVE RECORD

The Administrative Record which supports the Draft Permit is available for review and copying during business hours at the following location:

Wyoming Department of Environmental Quality
Solid and Hazardous Waste Division
200 W 17th Street, 2nd Floor
Cheyenne, Wyoming 82002
Phone: 307-777-7752

The Administrative Record for the Draft Permit consists of the following documents:

1. HF Sinclair Casper Refining LLC's September 1, 2026 Part A & Part B Permit Application

2. WDEQ's September 1, 2026 letter notifying HFS Casper that the Permit Application (documents described in #1) is complete and technically adequate, and that the effective date of the Permit Application is September 1, 2026.

PERMIT CONDITIONS

The Draft Permit Conditions are based as much as possible on HFS Casper's Part A & Part B Permit Application.

These Permit Conditions and provisions are explained below.

1. INTRODUCTION AND PERMIT AUTHORITIES

   Describes the Statutory and Regulatory Authorization and requirements for the Draft Permit.

2. PERMIT APPROVAL

   Includes signature of the Director and effective dates for the Final Permit.

3. DEFINITIONS

   Provides definitions of some terms commonly used in the Draft Permit.

4. PERMIT PARTS

   The Draft Permit is structured in "Parts", with Parts which do not currently apply to the HFS Casper marked as "RESERVED". This approach makes it easier to track pertinent requirements and modify the Permit in the future, as necessary. Each Part contains specific requirements or "Conditions". The Draft Permit Parts are as follows (the "active" Permit Parts are shown in **bold**):

PERMIT PARTS

PART I **STANDARD PERMIT CONDITIONS AND FACILITY REQUIREMENTS**

This Part includes standard permit conditions which are applicable to all permits issued under WDEQ/HWRR, including duties of the Permittee and permit modification requirements. Provisions for Dispute Resolution are also contained in this Part.

PART II **GENERAL UNIT CONDITIONS FOR THE AGGRESSIVE BIOLOGICAL TREATMENT UNIT (ABTU)**

This Part establishes general conditions under the requirements of WDEQ/HWRR for the ABTU including the following:

a. Design and operation
b. Waste analysis
c. Security
d. Inspections
e. Personnel training
f. Contingency plan
g. Closure plan
h. Financial assurance

PART III STORAGE OF REFINERY WASTES IN CONTAINERS [RESERVED]

Waste is stored in containers for less than ninety days, therefore this Part is RESERVED.

PART IV STORAGE OF REFINERY WASTES IN TANKS [RESERVED]

PART V **SPECIAL SURFACE IMPOUNDMENT UNIT CONDITIONS FOR THE ABTU**

This Part establishes special conditions for the ABTU including more specific requirements pertaining to design, construction, operation and monitoring of the unit.

PART VI LAND TREATMENT AREAS [RESERVED]

PART VII WASTE PILES [RESERVED]

PART VII LANDFILLS [RESERVED]

PART IX(A) INCINERATION [RESERVED]

PART IX(B) SHORT-TERM INCINERATION TEST [RESERVED]

PART X GROUND WATER DETECTION MONITORING PROGRAM FOR THE ABTU [RESERVED]

PART XI GROUNDWATER COMPLIANCE MONITORING PROGRAM FOR THE ABTU

This Part establishes ground water compliance monitoring requirements at the ABTU under WDEQ/HWRR. The Permittee is required to conduct a compliance monitoring program under WDEQ/HWRR due to the fact that groundwater contamination has been detected in the vicinity of the ABTU. The Permittee is required to conduct semi-annual sampling at designated compliance wells for Ground Water Protection Standard (GWPS) constituents that were determined based on historic ground water sampling for a period of three years after the effective date of the Permit and annually thereafter.

The GWPS has been established by WDEQ to include arsenic, cobalt, benzene, 1,4-dioxane, 1-methylnaphthalene, phenanthrene, benzo(a)anthracene, benzo(a)pyrene, and chrysene. These constituents have been selected based on historic groundwater sampling. The GWPS is set to require that all GWPS constituents must remain at or below their respective federal Maximum Contaminant Level (MCL), or the Wyoming Drinking Water Equivalent Level (DWEL) if an MCL is not available for a specific constituent, or the Wyoming Water Quality Criteria Chapter 8 value. If, based on statistical analysis, the GWPS is confirmed to have been exceeded, HFS Casper must apply for a permit modification to establish a Corrective Action Program under WDEQ/HWRR as discussed in Part XI of the Draft Permit, unless there is no evidence that the ABTU is leaking or has leaked during the operation of the unit or HFS Casper can demonstrate that a source other than the ABTU caused the GWPS to be exceeded. The Draft Permit includes specific criteria and a line of evidence approach to make such a demonstration. WDEQ believes the compliance monitoring program, in conjunction with proper operation of the leachate collection system will provide adequate environmental monitoring and protection.

PART XII GROUND WATER CORRECTIVE ACTION PROGRAM FOR THE ABTU

HFS Casper will be required to implement a corrective action program for releases to ground water from the ABTU under WDEQ/HWRR if the GWPS is exceeded, unless there is no evidence that the ABTU is leaking or has leaked during the operation of the unit or HFS Casper can demonstrate that a source other than the ABTU caused the GWPS to be exceeded. A Ground Water Corrective Action Program for the ABTU is not being required as of the effective date of the Permit due to the fact that there is no information to indicate that the ABTU is the source of subsurface hydrocarbon contamination in the area. A protective GWPS is designated in the Draft Permit, and the Permittee is required under Part

XIV of the Draft Permit to conduct a corrective action program under WDEQ/HWRR for the ABTU and all other identified SWMU/ and AOC.

PART XIII(A) POST-CLOSURE CARE FOR THE ABTU [RESERVED]

This Part is RESERVED due to the fact that HFS Casper will clean close the ABTU after it is taken out of service sometime in the future. If HFS Casper cannot clean close the ABTU, then they must apply for a permit modification to establish alternate closure and post-closure conditions.

PART XIV CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

This Part incorporates the requirements for corrective action for SWMU and AOC, as described in Section J of the Permit Application and the referenced WDEQ-approved corrective action plans and documents.

PART XV CORRECTIVE ACTION INTERIM MEASURES: BIOSPARGE AND SVE SYSTEM, OBSERVATION OF A RIVER SHEEN, LNAPL PLAN , AND NORTH PLATTE RIVER BOUNDARY SYSTEM

This Part outlines the requirements for interim corrective measures currently being implemented and incorporates the operational procedures in the Permit Application and other stand-alone WDEQ-approved documents for the Biosparge and SVE System, Observation of River Sheen, LNAPL Plan and the North Platte River Boundary System. Supporting requirements are provided in Section J of the Permit Application and the referenced WDEQ-approved plans. Groundwater monitoring requirements are addressed in Part XVI.

PART XVI GROUNDWATER AND OTHER MONITORING REQUIREMENTS

This Part establishes requirements for ground water and other types of monitoring required under the Permit. Monitoring requirements are contained in Permit Parts XI, XIV, and XV and are further defined in Sections E and J of the Permit Application and the referenced WDEQ-approved plans.

SUPPORTING DOCUMENTATION

PERMIT APPLICATION AND SUPPORTING DOCUMENTATION

The Permit Application and referenced supporting documents support the various Permit Conditions and are listed at the end of the certain Permit Parts. These documents include ABTU operating, monitoring, contingency, and closure plans, and corrective action and groundwater monitoring plans.

ADMINISTRATIVE RECORD

The administrative record is described elsewhere in this fact sheet and provides the basis for the Draft Permit.

D. PROCEDURES FOR REACHING A FINAL DECISION

PUBLIC COMMENT PERIOD

Comments on the Draft Permit will be accepted by WDEQ and will commence within fifteen (15) days of issuance of the Draft Permit. The Draft Permit is issued on October 30, 2026, the public comment period will commence on November 16, 2026. Public comments will be accepted for forty-five (45) days; therefore, the public comment period will end on December 31, 2026.

PUBLIC HEARING

During the public comment period, any interested person may submit written comments on the Draft Permit and may request a public hearing. A request for a public hearing is required to be in writing and state the nature of the issues proposed to be raised in the hearing. If no request for a public hearing is received by WDEQ within the public comment period, then a public hearing will not be held.

RESPONSE TO COMMENTS

WDEQ will evaluate all comments received during the public comment period, and will provide a response to all significant comments in a Response to Comments document at the same time a final permit decision is made.

NOTIFICATION OF FINAL DECISION

Each person who, during the public comment period, submits written comments or requests to receive WDEQ's Response to Comments document will receive a copy of the final permit decision. WDEQ's final permit decision will include a discussion of changes, if any, made to the Draft Permit and Administrative Record.

APPEAL PROCEDURES

The final permit decision will include a reference to the procedures for appealing the Permit, which will include the requirement that any petition for appeal of the final permit decision must be provided to WDEQ within thirty (30) days of the final decision date.

E. WDEQ CONTACT PERSON

For further information, contact Mr. PJ Wilber, Wyoming Department of Environmental Quality / Solid and Hazardous Waste Division, 200 W 17th Street, 2nd Floor, Cheyenne, WY 82002; Phone: 307-777-7746.