From:	DeVenecia, Eric R - DNR
To:	David Beattie
Cc:	Stocks, Adrian G - DNR; Knutson, Jason R - DNR; Sager, John E - DNR
Subject:	RE: Reduced Treatment System Sampling Request
Date:	Thursday, June 14, 2018 12:26:54 PM

Dave
Your request for reduced sampling as described in your email below is approved.
Please let us know if you have any questions.
Regards,

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Eric de Venecia, P.E.
Phone: (715) 685-4155
eric.devenecia@wi.gov

From: David Beattie [mailto:David.Beattie@huskyenergy.com]
Sent: Thursday, June 14, 2018 11:51 AM
To: Stocks, Adrian G - DNR <Adrian.Stocks@wisconsin.gov>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>
Subject: Reduced Treatment System Sampling Request

Adrian/Eric,

The Superior Refinery would like to request reduced sampling frequency for our temporary GAC/Resin treatment system for PFAS.
As allowed by the conditions on page two of the 6/4/2018 WDNR letter authorizing the refinery for coverage under the WPDES general permit for Petroleum Contaminated Water (No. WI-0046531-06-0):

The sampling frequency for PFAS compounds will be every other day during discharge. The facility may request a reduction in sample frequency as experience is gained using this treatment process and consistency is established. All internal sample results (between GAC units) will be made available to department for review upon request.

Currently, samples collected on Saturday or Sunday do not arrive at the 3rd party lab until Tuesday. As you know, the samples cannot be analyzed locally and need to be sent to the lab by Federal Express. We also have to ensure the samples follow the proper protocol and be kept on ice/cold upon receipt by the lab. These two issues result in not being able to send the samples collected on Saturday or Sunday out until Monday with receipt by the lab on Tuesday.
This would leave us with the same decision point/timeframe for switching between GAC units as sampling on Monday, as those samples would be received by the lab on Tuesday as well.

The refinery is requesting a revised sampling frequency of every Monday, Wednesday, Friday starting Monday June 18th.

We are set to sample today and Saturday so starting Monday June 18th we would be ideal.

The system has been in operation since May 25th and as of June 10th, we have only observed 5-6% (or less) breakthrough for PFOA after the lead GAC.

Thanks for your time on this and please let me know if you have any questions.

Thanks,
Dave

David Beattie
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