

From: [DeVenecia, Eric R - DNR](#)
To: [Sager, John E - DNR](#)
Subject: FW: Superior Refinery - Revised Sampling and Analytical Plan 11/15/2018
Date: Monday, November 19, 2018 10:03:09 AM

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Eric de Venecia, P.E.

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From: Sager, John E - DNR
Sent: Friday, November 16, 2018 1:20 PM
To: David Beattie <David.Beattie@huskyenergy.com>
Cc: Matthew Turner <Matthew.Turner@huskyenergy.com>; Bill Snellman <Bill.Snellman@huskyenergy.com>; Katie Wolohan <kwolohan@barr.com>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>
Subject: RE: Superior Refinery - Revised Sampling and Analytical Plan 11/15/2018

Dave,

The changes to the surface water monitoring you propose in #3 below are acceptable. The Department may request additional sampling locations and/or change in sampling frequency if information becomes available that indicates additional sampling is necessary.

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John Sager

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From: David Beattie <David.Beattie@huskyenergy.com>
Sent: Thursday, November 15, 2018 4:40 PM
To: Sager, John E - DNR <John.Sager@wisconsin.gov>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>
Cc: Matthew Turner <Matthew.Turner@huskyenergy.com>; Bill Snellman <Bill.Snellman@huskyenergy.com>; Katie Wolohan <kwolohan@barr.com>
Subject: Superior Refinery - Revised Sampling and Analytical Plan 11/15/2018

John/Eric,

We would like to request the changes outlined below to our sampling and analytical plan. We have

been operating the PFAS water treatment systems for 6 months, and we have a better understanding of when 50% breakthrough will occur after the lead granular activated carbon vessels. Sampling and analytical plans that reflect the requested changes are attached to this email

1. **Decrease treatment system monitoring of PFAS** at all sampling ports to one time per week rather than two times per week.
2. **Decrease our treatment system monitoring of general chemistry parameters** to monthly rather than weekly. We would also like to **reduce the number of sampling locations** to just the influent and effluent of the treatment system rather than at every sampling port. Since operating the treatment system we have not observed severe imbalances in the ions monitored.
3. **Decrease our off-site PFAS monitoring at 3rd St., 21st St, and at the mouth of Newton Creek** to monthly rather than biweekly. Over the winter we intend to recirculate treated water at times rather than discharging. This will help maintain sufficient water onsite to keep the WWTP running. This sampling is for informational purposes only and we feel reducing this sampling does not directly impact decision making in regards to the site and recovery activities. Depending on ice and lack of flow, this sampling may or may not be possible at times.

We are also keeping our options open with our analytical labs. We have been using Merit, which uses a modified switch analytical laboratories for PFAS monitoring from Merit to Maxaam Analytics, which uses modified EPA method 537. We have analysed several split samples between laboratories and are confident that switching labs will not bias the monitoring data.

Please let us know if WDNR accepts these changes or if you have any questions. **We would like to implement these changes beginning 11/19.**

If you would like to have a call to discuss after you have had a chance to look over please let me know.

Thanks,
Dave

David Beattie

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