



# Addendum to Air Monitoring Plan

## 2018 Superior Refinery Fire

David Beattie  
11/12/2018

Environmental Manager

11 / 12 / 18

Signature

Date

Safety Manager

11/12/18

Signature

Date

Refinery Manager

11/12/18

Signature

Date



## Superior Refining Company LLC

2407 Stinson Avenue  
Superior, WI 54880

# Addendum to Air Monitoring Plan

**November 12, 2018**

### **Existing Air Monitoring:**

Current air monitoring during site stabilization and hydrocarbon de-inventory work following the April 26, 2018 Superior Refinery Fire includes the following:

#### **On Site Work Area:**

- 24/7 continuous air monitoring at 12 fixed locations using AreaRAE monitors
- Additional work area continuous monitoring with AreaRAE monitors as well as real-time monitoring with handheld instruments associated with site stabilization and hydrocarbon de-inventory work as determined in coordination with Superior Refining Company (SRC).
- Worksite industrial hygiene monitoring for asbestos fibers in air (worker and area) in conjunction with ongoing asbestos abatement activities.

#### **Fence Line Perimeter:**

- Existing fence line monitoring required by the Refinery Sector Rule.
- 24/7 continuous air monitoring at the refinery fence line using AreaRAE monitors was discontinued on 6/19/18.

#### **Community:**

- The SRC maintains the capacity to initiate on site air monitoring in the event that an activity in the work area causes a significant air release that may extend beyond the facility fence line.
- Scheduled community monitoring was discontinued on 6/19/18.

### **Revised Air Monitoring:**

Since April 26, 2018, the Superior Refinery has been conducting air monitoring to assess air quality for workers at the refinery and the surrounding community following the 2018 Superior Refinery Fire. Air monitoring readings were collected 24 hours/day, 7 days/week in the community, at the refinery fence line and in the work zones at the refinery through May 25, 2018. On May 26, 2018, the community air monitoring was reduced to daylight hours when site stabilization and hydrocarbon de-inventory operations at the refinery were occurring. On June 19, 2018, scheduled community air monitoring and 24/7 continuous air monitoring at the fence line of the refinery were discontinued (see 6/12/2018 addendum).

Since the air monitoring program commenced in response to the April 26<sup>th</sup> fire, the facility has collected over 200 million samples from on-site and community monitoring, all of which have indicated that there have been no off-site impacts following the event during recovery and de-inventory operations.

At this time, the majority of the hydrocarbons have been de-inventoried from the refinery process units and this bulk removal of hydrocarbons marked a significant reduction in risk of potential uncontrolled releases. Remaining process units that have not been fully de-inventoried contain low volumes of hydrocarbons and are not actively leaking. This milestone represents a significantly reduced probability of impacts to air quality on and off site. Any work conducted on the remaining process units that have not been fully de-inventoried can be monitored as needed using resources and personnel present at the Superior Refinery. Existing fence line monitoring required by the Refinery Sector Rule will continue.

In consideration of the progress made to date in de-inventorying refinery process units, and the associated decreased risk of significant air emissions during the remaining site stabilization and de-inventory work, the Superior Refinery is discontinuing the 24/7 continuous air monitoring at fixed work zone locations and the real-time handheld monitoring at midnight November 15, 2018.

The associated and estimated change in GHD personnel requirements from the present level of effort to the reduced level of effort is presented below:

	<u>Present Air Monitoring</u>	<u>Reduced Air Monitoring</u>
<u>Day Shift</u>		
Supervisor	1	1
Assistant - Data/QA/Reporting		
Assistant – Data/GIS		
Technician – Site Monitoring	3	0
Technician – Community Monitoring		
<u>Night Shift</u>		
Supervisor	1	0
Technician – Site Monitoring	2	0
<u>Day Shift - Asbestos</u>		
Industrial Hygienist	1	1
Technician	1	1
Total Staff	9	3