



Superior Refining Company LLC

2407 Stinson Avenue

Superior, WI 54880

Tel: (715) 398-3533

November 16, 2018

Mr. John Sager
Wisconsin Department of Natural Resources
1701 N 4th St
Superior, WI 54880

Subject: Superior Refining Company LLC
2407 Stinson Avenue
Superior, WI 54880
DNR SERTS Activity # 20180426NO16-1
DNR FID # 816009590
DNR BRRTS Activity # 02-16-581317

Superior Refining Company LLC is currently engaged in recovery efforts in response to the 4/26/18 Superior Refinery Fire. Ongoing activities include asbestos abatement, site stabilization, mechanical integrity assessments, deinventory of hydrocarbons from the damaged process units, Tank Farm deinventory facility wide and winterization of the facility. These activities are critical to ensure site safety and long-term protection of undamaged or salvageable equipment as the facility may not be fully operational until calendar year 2021.

Site stabilization including asbestos abatement, mechanical integrity assessments and hydrocarbon deinventory is ongoing in the units most affected by the 4/26/18 incident which includes the Saturated Gas Plant portion of the Crude Unit, Vacuum Unit, FCCU and the Asphalt Tank Farm. All other non-operational process units that were not impacted by the incident have been deinventoried, cleaned, rendered hydrocarbon free and winterized for long term layup.

Cleanup of the released asphalt, #6 fuel oil and therminol has taken significant strides in the months following the incident. Nearly all the asphalt that flowed into the process units has been removed and the majority of material released in the asphalt tank farm has also been recovered. Structural impediments such as damaged pipe racks have hindered recovery progress in the Asphalt Tank Farm but demolition efforts are ongoing.

Winterization work continues and has been a major emphasis due to the impending cold winter months. Winterization efforts include draining rundown piping in the product storage tank farm, emptying and consolidating product storage tanks, laying up stabilized process units with nitrogen, covering heater stacks and fin fans to prevent moisture from accumulating, and other activities required to ensure the facility is safely winterized and that all reasonable steps have been taken to eliminate or mitigate equipment damage that could occur as a result of a long-term layup.



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While significant milestones have been achieved in pursuit of the efforts described above, there is still a substantial amount of work yet to be accomplished to fully ensure the recovery, stabilization, and winterization work scopes have been completed. At this time, these tasks represent the top priorities at the facility. As a result, Superior Refining Company LLC would like to request an extension to the Site Investigation Work Plan and Site Investigation deadlines specified in the Responsible Party letter provided to the Refinery on 9/20/2018. The Superior Refinery believes that a deadline in the spring of 2019 would provide sufficient time to address the Site Investigation Work Plan and Site Investigation after safely securing the facility for long term layup.

Sincerely,

Matt Turner
Environmental Technician
Superior Refining Company LLC