



July 29, 2020

Mr. Matthew Turner
Superior Refining Company LLC
2407 Stinson Avenue
Superior, WI 54880

SUBJECT: Technical Assistance Request
Superior Refining Company LLC
2407 Stinson Avenue, Superior
Wisconsin BRRTS #: 02-16-581317

Dear Mr. Turner:

On July 23, 2020, the Wisconsin Department of Natural Resources (Department) received a *Site Investigation Work Plan* (SIWP) for the Superior Refining Co LLC (SRC), BRRTS ID# 02-16-581317 (Site) site, prepared and submitted to the Department on your behalf by Barr Engineering Company (Barr). A technical assistance review fee of \$700.00 was included with the SIWP for the Department's review and comment on the SIWP.

The SIWP describes the site investigation activities proposed as an initial assessment of per- and polyfluoroalkyl substances (PFAS) compounds associated with firefighting foam used to extinguish the April 25, 2018 fire at the refinery.

Work proposed in the SIWP includes the installation of soil borings, collection of soil samples and analysis of these samples for PFAS compounds discharged in the areas of the Site affected by the fire and the Stinson Avenue ditch. The SIWP states this work plan is an initial assessment of the discharge area to be used to guide subsequent site investigation activities.

The Department has the following comments on the SIWP:

- Results of previous site investigation work at the Site, documented in Barr's February 28, 2020 Site Investigation Report, indicate there are areas of the Site where petroleum contamination resulting from the April 25, 2019 explosion and fire is not defined. If any of the proposed soil borings being installed for the PFAS investigation are in areas where petroleum contamination is not defined, the Department suggests collection of samples for petroleum analysis whether field observation indicates contamination.

- The SIWP does not include investigation of groundwater for PFAS compounds. While the Department understands the intent of this SIWP is to make an initial assessment of PFAS contamination in soil, the Department believes that due to the affinity of PFAS compounds for water and the shallow groundwater at the Site, an investigation of groundwater will likely be necessary as an action subsequent to the work proposed in the SIWP.

The Department approves the SIWP with the understanding that the results will be used to expand the site investigation as necessary to determine the nature, degree and extent of hazardous substances associated with this Site, both areal and vertical, in all affected media, per the requirements of Wis. Admin. Code § NR716.11(3)(a).

Please contact me at (715) 392-7822 or at john.sager@wisconsin.gov if you have any questions concerning this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "John Sager". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Sager".

John Sager
Hydrogeologist
Remediation and Redevelopment Program

C: Lynette Carney, Barr Engineering Co.