

Sager, John E - DNR

From: DeVenecia, Eric R - DNR
Sent: Tuesday, May 18, 2021 1:32 PM
To: Matthew Turner; Sager, John E - DNR
Cc: 'David Beattie'
Subject: RE: Request for Change to Treatment System PFAS Monitoring Frequency

Matt,

John and I were able to review and discuss your request earlier than anticipated. The reduced treatment system PFAS monitoring frequency and associated revised Sampling and Analytical Plan (updated 5/18/2021) are acceptable. All other conditions of the letters of coverage and general permit will continue to apply.

Thank you
Eric

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.

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From: Matthew Turner <Matthew.Turner@cenovus.com>
Sent: Tuesday, May 18, 2021 9:55 AM
To: Sager, John E - DNR <John.Sager@wisconsin.gov>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>
Cc: 'David Beattie' <David.Beattie@cenovus.com>
Subject: Request for Change to Treatment System PFAS Monitoring Frequency

John and Eric,

We would like to request the changes outlined below to our sampling and analysis plan (SAP) for our PFAS water treatment system. The PFAS water treatment system has been operating for approximately 3 years following the incident at the refinery in 2018, and the data collected to date provides a good understanding of when 50% breakthrough of PFOA or PFOS will occur following the lead granular activated carbon (GAC) vessels. During this time, data shows the treatment systems can operate an average of 66 days between change-out events (please refer to the summary table below for a complete list of all lead GAC vessel change-out dates and number of days between change-out events). Since the incident, we have maintained concentrations of PFOA and PFOS below method reporting limits at the effluent of the PFAS water treatment system. The treatment system SAP that reflects the requested changes is attached to this email.

- **Decrease treatment system monitoring of PFAS** at all treatment system sampling points to monthly (one time per month if discharging) rather than the currently approved every other week (one time per two weeks), which has been in place since WDNR approval in January 2020.

At this time, we are not requesting any changes to the sampling and analysis plan for the offsite surface water locations. Offsite surface water locations are currently sampled monthly (one time per month) as conditions allow.

Please let us know if WDNR accepts these changes or if you have any questions. We would like to implement these changes beginning in June 2021.

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

Treatment System	Start-up date	Shutdown date for lead vessel change-out	Days in operation between GAC change-out events ⁽¹⁾	Calendar days between GAC change-out events
Treatment System 1	5/25/2018	7/13/2018	49	49
	9/7/2018	10/28/2018	51	51
	11/1/2018	12/10/2018	32	39
	12/14/2018	5/20/2019	125	157
	5/24/2019	10/7/2019	92	136
	10/24/2019	12/17/2019	36 ⁽²⁾	54
	1/10/2020	3/19/2020	31 ⁽²⁾	69
	3/29/2020	8/24/2020	75 ⁽²⁾	148
	11/8/2020	3/10/2021	44 ⁽²⁾	122
Treatment System 2	7/5/2018	9/7/2018	64	64
	9/15/2018	11/30/2018	76	76
	12/7/2018	2/1/2019	56	56
	2/8/2019	5/29/2019	106	110
	6/4/2019	8/29/2019	62	86
	9/12/2019	11/17/2019	66	66
	12/17/2019	1/9/2020	9 ^(2,3)	23
	3/1/2020	6/14/2020	53 ⁽²⁾	105
	7/22/2020	3/15/2021	100 ⁽²⁾	236

- (1) number of days in operation accounts for shutdown periods for maintenance and other activities. The treatment systems were not always operated continuously between the start-up and shutdown dates.
- (2) For these change-out events, PFOA or PFOS breakthrough was less than 40%. Change-out occurred to alleviate GAC vessel backpressure or for other operational reasons (for example, the system was already shutdown).
- (3) This value was not included in the average referenced in the email body.

Thanks

Matt Turner

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On January 1, 2021, Husky and Cenovus combined to form a resilient integrated energy leader. Husky is now part of the Cenovus group of companies.

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