

# PFAS Soil Investigation - Supplement A Progress Update

**To:** John Sager, Wisconsin Department of Natural Resources

**From:** Lynette Carney, Barr Engineering

Subject: Superior Refinery April 26, 2018 Incident

**Date:** May 25, 2022 **Project:** 49161497.02

**BRRTS Number**: 02-16-581317

This PFAS Soil Investigation – Supplement A progress update report summarizes the work completed thus far from the *PFAS Soil Site Investigation Work Plan* (SIWP) - *Supplement A* performed by Barr Engineering Co. (Barr) at the request of Superior Refining Company LLC (SRC) at the Superior Refinery in Superior, Wisconsin (Figure 1).

#### **Background**

Site Investigation activities were initiated in response to the April 26, 2018 (Incident) at the Site in which asphalt, Therminol®, #6 fuel oil containing hydrocarbons were released and Aqueous Film Forming Foam (AFFF) containing PFAS was utilized for emergency response firefighting efforts. SRC prepared the SIWP – Supplement A (Barr, 2021b) in response to a request from the Wisconsin Department of Natural Resources (WDNR) for additional PFAS soil investigation in their letter response to the *Site Investigation Report Update* (SIRU) (Barr, 2021a) dated April 22, 2021 (WDNR, 2021). The SIWP – Supplement A scope of work was approved by WDNR in their letter dated October 18, 2021.

The purpose of this update is to inform WDNR of the progress made on the SIWP - Supplement A scope to date. As outlined in the SIWP – Supplement A, this phase of the investigation included the following objectives:

- Collect additional PFAS soil samples to delineate the horizontal extent of the Incident impacted areas where PFAS compounds were previously documented in soil; and
- Collect/assess additional information necessary to complete the PFAS soil investigation.

Site features are shown on Figure 2 and previous PFAS soil sample results are provided on Figure 3.

#### Field Activity Summary

The SIWP – Supplement A proposed up to 19 soil borings to be completed to evaluate PFAS soil impacts. Two Stinson Avenue Ditch (SAD) borings were complete on November 16, 2021 (Figure 4a), the six western Asphalt Tank Farm (ATF) borings were completed on November 16 and 17, 2021 (Figure 4b) and

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nine of the eleven main Asphalt Tank Farm (ATF) borings were completed on May 14, 2022 (Figure 4c). Soil samples were analyzed for the Wisconsin required suite of 33 PFAS analytical compounds. Laboratory analyses were performed by Merit Laboratories, Inc. in East Lansing, Michigan (Merit). Additionally, at each of the completed soil boring locations, field screening parameters were observed including visual, distinguishable odor, and soil organic vapor headspace.

Two soil borings remain to be completed in the main ATF as part of the SIWP – Supplement A. These remaining borings include PFAS ATF-15 and PFAS ATF-16 and are depicted in Figure 4c.

### **Future Investigation**

The refinery rebuild activities are continuing and the remaining borings are located in heavily congested areas of the refinery. Depending on the site rebuild schedule, the remaining two borings will be completed as site access allows and are currently targeted for July 2022.

An investigation report update will be submitted within 90 days following the receipt of the final laboratory report from the remaining two borings for this phase of the Site Investigation. The investigation report update will be prepared to summarize the results of the PFAS soil delineation investigation and if necessary, this report will make recommendations for additional investigation, interim action, and/or remedial action. Final schedules will be dependent on coordination with construction contractors, weather conditions, facility accessibility during the refinery rebuild and restart activities, and receipt of analytical results.

## **Figures**

Figure 1 Site Location
Figure 2 Site Features

Figure 3 Previous Soil Sample Results
Figure 4a PFAS Soil Sample Locations
Figure 4b PFAS Soil Sample Locations
Figure 4c PFAS Soil Sample Locations

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#### References

Barr, 2021a. Site Investigation Report Update – Hydrocarbon and PFAS, Superior Refinery April 26, 2018
Incident, BRRTS Number: 02-16-581317, prepared for Superior Refinery Company, LLC. February 2021.

Barr, 2021b. PFAS Soil Site Investigation Work Plan – Supplement A, Superior Refinery April 26, 2018 Incident, BRRTS Number: 02-16-581317, prepared for Superior Refinery Company, LLC. September 2021.

WDNR, 2021. WDNR Letter with Site Investigation Report Update Review Comments, BRRTS ID 02-16-581317, Wisconsin Department of Natural Resources, April 22, 2021.

# Figures











