



April 28, 2023

Joseph Pearson
Superior Refining Company LLC
2407 Stinson Avenue
Superior, WI 54880

Subject: Site Investigation Report Update - Supplement A
Superior Refining Company LLC
2407 Stinson Avenue, Superior, Wisconsin 54880
BRRTS ID#: 02-16-581317

Dear Mr. Pearson,

The Wisconsin Department of Natural Resources (DNR) has completed a review of the March 2023 Site Investigation Report Update – Supplement A (SIR), submitted to the DNR on your behalf by Barr Engineering Co. (Barr). The SIR documents the work conducted to investigate per- and polyfluoroalkyl substances (PFAS) compounds and further investigate petroleum hydrocarbons remaining on site following the explosion and fire of April 26, 2018. The DNR received a \$1,050 fee for review of the SIR.

The DNR has the following comments regarding the SIR:

- Based on the results of the investigation, it appears the extent of PFAS contamination greater than Wis. Admin. Code ch. NR 720 Residual Soil Standards (RCLs) for direct contact in an industrial setting has been defined, as none of the soil samples collected exceeded the industrial direct contact RCLs.
- PFAS contamination remaining in soil may be a concern for groundwater quality. The DNR will make a determination on definition of soil impacts that may result in the exceedance of the Wisconsin Department of Health Service's recommended groundwater standards following the groundwater investigation.
- The DNR concurs with the recommendation made by Barr that the groundwater investigation previously approved by the DNR be initiated. The DNR requests notification of the timing of this work.
- Barr reports that two areas investigated, south of the Crude Unit and west of Tank 104, found hydrocarbon contamination unrelated to the events of April 26, 2018. If Superior Refining Company LLC (SRC) has identified historical hazardous substance discharges during this investigation that are not related to this site (BRRTS ID# 02-16-581317), those discharges must be reported to the DNR as required in Wisconsin Statutes § 292.11(2) and investigated and remediated as required in Wis. Admin. Code chs. NR 700-799.
- The DNR concurs with the recommendation made by Barr that the surface impacts near Tank 87 should be remediated and documented as part of the interim actions.

The DNR appreciates the actions that SRC has taken to investigate this site and looks forward to working with SRC on completing the site investigation activities. Please contact me at John.Sager@Wisconsin.gov or at (715) 919-7239 if you have any questions concerning this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Sager".

John Sager
Hydrogeologist
Remediation and Redevelopment Program

C: Lynette Carney, Barr