



November 8, 2024

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

(sent via email only to [joseph.pearson@cenovus.com](mailto:joseph.pearson@cenovus.com))

Subject: Site Investigation Report Update – Groundwater  
Superior Refining Company LLC  
2407 Stinson Avenue, Superior, WI 54880  
BRRTS ID#: 02-16-581317

Dear Mr. Pearson,

The Wisconsin Department of Natural Resources (DNR) has completed a review of the August 2024 Site Investigation Report Update – Groundwater (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) and further investigate petroleum hydrocarbons remaining on site following the explosion and fire of April 26, 2018. Specifically, this SIR documents the installation of one groundwater monitoring well (IW-1) and the collection and analysis of groundwater samples from IW-1 for the presence of PFAS. A technical assistance review fee of \$1,050 was received for the DNR's review of the SIR.

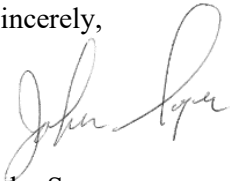
The DNR has the following comments regarding the SIR:

- “Wisconsin Default Soil to Groundwater Residual Contaminant Levels” or “GW-RCLs” are referenced in the SIR. For clarification, the DNR has not established Default GW-RCLs for PFAS. The GW-RCLs referenced in the SIR were derived by Barr using the method described in Section 5.3.2 of *Site Investigation Report Update – Supplement A*, submitted by Barr on your behalf in March 2023.
- Due to updated toxicological information on various PFAS, Direct Contact Residual Contaminant Level (DC-RCL) concentrations have been reduced since the beginning of the site investigation. The next iteration of the SIR should utilize the new PFAS DC-RCLs for comparison of all soil samples collected during the site investigation and in development of a response action plan.
- In a letter dated April 22, 2021, the DNR issued approval of the Initial Groundwater Investigation Work Plan, which was included in Appendix G of the February 2021 Site Investigation Report Update. However, the DNR also stated, *“Because of the large area of the hazardous substance discharges from the April 26, 2018 incident, the DNR does not intend to concur with a determination that further groundwater investigation is not necessary based on the results of sampling from the one monitoring well proposed in this work plan.”* While the analytical results from monitoring well IW-1 are favorable, the size and complexity of the original hazardous substance discharges are such that additional monitoring wells are necessary to investigate the entire potential source area. Therefore, the DNR does not concur that the groundwater investigation is complete. The DNR recommends a work plan be prepared that includes installation and sampling of additional groundwater monitoring wells to adequately characterize

groundwater within and around the source areas. The DNR also suggests utilizing the facility-wide monitoring well network for a portion of the groundwater monitoring.

The DNR appreciates the actions that SRC has taken to investigate this site and looks forward to working with you on completing the site investigation activities. Please contact me at [John.Sager@Wisconsin.gov](mailto: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 (*sent via email only to lcarney@barr.com*)