

From: [DeVenecia, Eric R - DNR](#)
To: [David Beattie](#); [Sager, John E - DNR](#)
Cc: [Knutson, Jason R - DNR](#); [Stocks, Adrian G - DNR](#)
Subject: RE: Request for change to Treatment System PFAS monitoring frequency
Date: Thursday, January 30, 2020 1:07:57 PM
Attachments: [image002.png](#)

Dave

The reduced treatment system PFAS monitoring frequency and associated revised Sampling and Analytical Plan (updated 1/24/2020) 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.

Phone: (715) 685-4155

eric.devenecia@wi.gov

From: David Beattie <David.Beattie@huskyenergy.com>
Sent: Thursday, January 30, 2020 9:53 AM
To: Sager, John E - DNR <John.Sager@wisconsin.gov>; DeVenecia, Eric R - DNR <Eric.DeVenecia@wisconsin.gov>
Subject: Request for change to Treatment System PFAS monitoring frequency

Eric and John,

We would like to request the change outlined below to our sampling and analysis plan (SAP) for our PFAS water treatment system in regards to the frequency of sampling for PFAS. The PFAS water treatment system has been operating for approximately 20 months, 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, through approximately 120 sampling events, we have determined that we can get between 32 and 125 operational days between change-out events and 68 days on average. 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 sampling and analysis plan that reflects the requested changes is attached to this email.

- **Decrease treatment system monitoring of PFAS at all treatment system sampling points to every other week (one time per two weeks) rather than one time per week** (the last change to the treatment system sampling frequency for PFAS was back in November 2018).

We are not requesting any changes at this time 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 February 3, 2020.

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

Treatment System	Start-up date	Shutdown date for GAC Change-out	Days in operation between GAC change-out events ⁽¹⁾
Treatment System 1	5/25/2018	7/13/2018	49
	9/7/2018	10/28/2018	51
	11/1/2018	12/10/2018	32
	12/14/2019	5/20/2019	125
	5/24/2019	10/7/2019	92
	10/24/2019	12/17/2019	36 ⁽²⁾
Treatment System 2	7/5/2018	9/7/2018	64
	9/15/2018	11/30/2018	76
	12/7/2018	2/1/2019	56
	2/8/2019	5/29/2019	106
	6/4/2019	8/29/2019	62
	9/12/2019	11/17/2019	66

(1) The days in operation value 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) GAC was changed out while the treatment system was offline. The GAC had not been used to capacity (29% breakthrough of PFOA).

Thanks,
Dave

Please note my new work phone number is 715.718.8507.

David Beattie

Sr Environmental Technologist

Environmental

Superior Refinery

W 1.715.718.8507

C 1.218.348.9051

huskyenergy.com

