



April 22, 2021

Matt Turner  
Superior Refining Company LLC  
2407 Stinson Avenue  
Superior, WI 54880

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

Dear Mr. Turner,

The Wisconsin Department of Natural Resources (DNR) has completed a review of the February 2021 Site Investigation Report Update (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 investigation of petroleum hydrocarbons remaining on site following the explosion and fire of April 26, 2018. The DNR received a \$1050 fee for review of the SIR.

The DNR has the following comments regarding the site investigation conducted to date:

The PFAS investigation was performed in known source areas where PFAS contaminated firefighting water was contained or flowed through following the April 26, 2018 incident. Wis. Admin. Code § NR716.11(3)(a) requires the investigation of the nature, degree and extent of discharged hazardous substances. While the PFAS investigation did not detect PFAS compounds greater than residual contaminant levels (RCLs) for protection of direct contact in an industrial setting calculated using the process laid out in Wis. Admin. Code ch. NR 720, the PFAS investigation has not defined the extent of PFAS contamination in soil. As part of the continuing PFAS investigation, the soil investigation should be expanded to determine the extent of PFAS contamination in soil at the site. The additional soil sampling could be conducted in conjunction with the groundwater investigation.

The northern Stinson Avenue ditch is outside of the area where stormwater is captured and treated in the refinery's wastewater treatment plant. The PFAS contamination found in the Stinson Avenue ditch may be contributing to the PFAS contamination found in the surface water of Newton Creek. Also, the extent of PFAS contamination in the northern Stinson Avenue ditch is not defined. Additional investigation is necessary and additional interim actions should be conducted as necessary to reduce, to the extent practicable, the PFAS contamination entering Newton Creek.

The DNR concurs with Barr's recommendation that the hydrocarbon contamination that is thought to be from a discharge other than the April 26, 2018 explosion and fire should be reported to the DNR as a hazardous substance discharge incident and addressed as a separate environmental repair (ERP) site.

The DNR approves the Initial Groundwater Investigation Work Plan contained in Appendix G of the SIR. Based on previous discussions with Superior Refining Company LLC (SRC), it is the DNR's understanding that the monitoring well to be installed is an initial well installation for a larger groundwater investigation that will be

conducted once the well installation and sampling methods are evaluated from this initial effort. 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.

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. The DNR is willing to discuss options for completing the SIR in an efficient manner that is consistent with Wis. Admin. Code NR716. 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