

# LISTENING & RESPONDING

ADDRESSING COMMUNITY CONCERNS  
RELATED TO THE SUPERIOR REFINERY INCIDENT





# LISTENING & RESPONDING

## Addressing Community Concerns Related to the Superior Refinery Incident

Husky's Superior Refining Company (SRC) was pleased to send representatives to the Community Listening Session at the Superior Middle School, hosted by the University of Wisconsin – Extension ("UWEX"). The session provided an opportunity to hear directly from residents and helped us better understand the concerns of the community.

This booklet contains SRC's response to the concerns of the community and the questions outlined in a report issued by UWEX. It was compiled from information provided by various experts, information previously shared on our website at [www.huskyenergy.com/superior](http://www.huskyenergy.com/superior), in our Community Update newsletter, and other materials provided at our Open House on June 5, 2018.

We are mindful that many of the questions at the Listening Session are best answered by community resources, and where appropriate we have referred to information from community subject matter experts or other resources for additional information.

We have organized the responsive information into six sections. They are:

1. General
2. Refinery Operations
3. Emergency Response
4. Environmental Protection
5. Health
6. Safety

Each of these sections have subheads taken directly from the UWEX Report and we have provided responses to address these specific areas. In many cases, we have taken care to summarize the *Consolidated Questions*, and in others we have directly quoted from them.

Our response here is not intended to end the discussion on these issues or concerns. The Superior Refinery has been part of this community for more than 60 years and we expect this conversation with our neighbors to continue. We are committed to further discussions and hope to continue to share information through newsletters, websites, open houses, and social media.

We look forward to the ongoing dialogue.

***Thank you.***

# GENERAL

This section responds to general concerns raised at the Listening Session related to SRC's relationship with the community and the energy industry.

## Communication

Listening Session attendees asked several questions regarding communication, specifically asking for a “repository” of information and for communication with the community to continue. Since the days immediately following the incident, SRC has provided regular updates and answers to Frequently Asked Questions on our website at [www.huskyenergy.com/superior](http://www.huskyenergy.com/superior). The event has also been widely covered by the media and there are many public agencies involved that have issued public statements. SRC, our employees, the community, government agencies, and local businesses worked together in responding to the incident. SRC is grateful for the ongoing support and remains committed to our employees and the community. We also aim to continue sharing information, which will mean future Community Update newsletters and community engagement events like open houses.

## Refinery Community Relations

Questions were asked about SRC's Community Advisory Panel (CAP). The CAP is comprised of approximately 20 members from the Superior/Douglas County area who serve as an advisory group for the Refinery. When the CAP was formed in 2000, members were selected to represent a cross-section of community stakeholders. New members are selected by the Refinery with advice from the CAP. If a member representing a specific stakeholder category (educator, emergency responder, refinery neighbor, etc.) chooses to leave, a replacement who would maintain the original balance and diversity of the panel is sought.

Guests may attend CAP meetings. It is recommended that guests advise either the Refinery or facilitator in advance so that adequate accommodations (seating and food) can be provided. Guests traditionally have been invited by panel members when a specific meeting topic has been of interest. SRC uses the CAP regularly to discuss its activities and gain valuable feedback.

The CAP typically meets eight to nine times a year, but the schedule may fluctuate to accommodate Refinery activities. The dates are selected by members during an annual planning session and for the past several years, it has met on the third Thursday of the designated months. Periodically, a meeting date is changed to avoid conflicts and best-accommodate the majority of schedules. Meeting schedules may shift based on Refinery work such as turnarounds.

## The Husky Organization

Superior Refining Company is a licensee of the trademark, Husky Energy, and a member of the Husky portfolio of companies. With Husky only recently purchasing the Superior Refinery, many residents are not familiar with the Husky organization and were interested in more information. Some Listening Session participants specifically asked if Husky does “invest in renewable, sustainable, or new technologies,” while others expressed concern about whether the Refinery would reopen and resume normal operations. Questions about the relationship between Husky and Calumet (the Refinery’s former owner) were also raised.

The Husky companies, including SRC, strive to minimize operational impacts on land, habitat, air, water and wildlife. We monitor the environmental aspects of our operations and actively seek ways to lessen our environmental footprint. This includes working to reduce our air emissions, use water responsibly, and mitigate impacts and disturbances to land.

Husky helped pioneer renewable ethanol production for use in ethanol-blended gasoline, starting almost 30 years ago. We currently operate two ethanol plants, one in Minnedosa, Manitoba and the other in Lloydminster, Saskatchewan, with total production of up to 80 million gallons per year.

At the Lloydminster plant, we capture up to 250 metric tons a day of carbon dioxide (CO<sub>2</sub>) to aid in enhanced oil recovery. The use of this carbon capture technology allows for the production of some of the lowest carbon intensity ethanol in Canada. From 2012 to 2017, we captured 362,000 metric tons of CO<sub>2</sub> at our Lloydminster Ethanol Plant.

We continue to evaluate additional carbon capture technologies and synergies, and are conducting several pilots at our Pikes Peak South thermal project. One pilot project underway since 2015 is capturing up to 30 metric tons per day, and a third-party demonstration pilot using an alternate technology has been capturing 0.5 metric tons per day, with plans to increase to 30 metric tons per day beginning in 2019.

To better understand the Husky companies’ commitment to the environment, please read our annual Environmental, Social and Governance (ESG) report that can be found online at [www.huskyenergy.com](http://www.huskyenergy.com)

While the Superior Refinery is not expected to resume normal operations until 2020 or later, we remain committed to our employees and the community and there will be no layoffs of Superior Refinery employees as a result of this incident. In fact, we will need all of our employees and many specialized contractors to assist with the rebuild process.

As a responsible corporate citizen, SRC is adequately insured, which will allow us to finance the rebuild and maintain our commitment to our employees and contractors.

Regarding Calumet and Husky, there is no continued financial/corporate relationship between the two companies.

## Energy Industry

Some participants asked general questions about the energy industry and “what opportunities are there to learn more about the energy sector in Superior and Twin Ports.” While these questions are better answered by broader industry associations, SRC is always open to having discussions about how to better communicate with our neighbors and educate people about our business and industry. We provide a wide range of information about the Husky companies, our operations, and our financial and environmental performance online at [www.huskyenergy.com](http://www.huskyenergy.com)

## Public Engagement

The Listening Session was a good opportunity for people to ask questions, and participants asked whether there would be more public meetings in the community. We are open to having discussions with our neighboring residents and businesses.

## Compensation

Questions were raised at the Listening Session regarding reimbursement for costs incurred as a result of the Incident, both immediately and in the future. Specifically, participants asked if SRC would compensate for testing livestock, while others had questions about liability waivers. Some attendees asked how long the reimbursement program would remain open for claims.

With respect to the testing of livestock, people should reference the July 5, 2018 memo from the Senior Toxicologist from the Wisconsin Department of Health Services, which stated: “We do not have reason to believe soils or livestock in the areas downwind from the fire have been affected in any way that should alter gardening or farming practices or the use of agricultural products from those areas.” The memo, which is available on the Douglas County website: [www.douglascountywi.org](http://www.douglascountywi.org), contains a detailed analysis of concerns that were raised regarding the April 26 fire and is a useful source of information when it comes to animal health-related questions.

All claims should be addressed to SRC’s Claims service, which is reviewing and assisting with claims for reimbursement of costs related to the incident, such as hotel accommodation or transportation necessitated by the evacuation. The toll-free number is: **1-855-527-5002**, available between 8 a.m. and 4 p.m. The reimbursement program remains open. SRC will continue to reimburse those who have experienced losses directly related to this fire event as long as is necessary.

A liability waiver is only required for settlement of a claim for physical injury. The standard release is available on the company’s website. No release is required for non-physical injury related claims.

## **Preparedness**

Participants also asked questions regarding the community's fire protection and emergency services. These important questions are best addressed directly by Douglas County Emergency Management and/or as part of a public dialogue. Nevertheless, the Superior Refinery will also always be open to community discussions on how we, along with other community members, can prepare in the case of emergencies.

## **Data**

There was lively discussion among participants at the Listening Session about the importance of data and whether the data from the incident will be "available to the public and independent scientists and experts for analysis." Data associated with the incident has been compiled, preserved, and shared with the proper investigating and/or regulatory agencies as required. Much of the data has been accessible through public channels. An example is the air monitoring data available on the Douglas County website. SRC complies with regulations requiring the provision of accurate data to regulatory agencies, and we similarly strive for accuracy in data provided to the public.

## **Foods – Gardening and Wild Forage**

In the immediate aftermath of the fire, some local gardeners and farmers raised concerns about "locally grown produce, vegetables, plants, and meats." The Douglas County Department of Health and Human Services and the Wisconsin Department of Health have provided information on "good gardening practices." That information can be found on the Douglas County [website](#)\*. As stated previously, the Department does not believe gardens "have been affected in any way that should alter gardening or farming practices or the use of agricultural products from those areas."

## **School District**

Given the proximity of schools in the area to the Refinery, some people wondered "what steps need to be taken to update evacuation and emergency plans to ensure student safety." The overall emergency response program for the Superior Refinery is coordinated with the Douglas County Local Emergency Planning Committee (LEPC), which we are part of, Douglas County Emergency Management, Superior Fire Department, Superior Police Department, Douglas County Sheriff's Office, and state and federal agencies through the Incident Command System. This coordination includes periodic meetings of the committee, which includes local emergency response officials, government officials, and industry representatives. School evacuation specifically is not part of the Superior Refinery Integrated Contingency Plan (ICP) because it is the responsibility of the schools, the School Board and Douglas County Emergency Management. SRC is not authorized to evacuate citizens of the community.

\*<http://www.douglascountywi.org>

# REFINERY OPERATIONS

While the Superior Refinery has been a community fixture for over 60 years, not all local residents understand the intricacies of the facility and how it operates. Many of the questions raised at the Listening Session related to the people, processes, and equipment involved in the Refinery operations and rebuild.

## Accountability

Questions were raised about the costs related to the Incident and the rebuilding process. Specifically, some Community Listening Session participants asked whether the State of Wisconsin would be asked to help with rebuilding.

SRC and its insurance provider continue to tabulate the costs incurred due to this event. Questions about other costs associated with state and federal regulatory agencies should be directed to those specific agencies. We remain committed to the Superior Refinery and the Community of Superior, WI. We intend to rebuild and operate again and there have been no layoffs as a result of this incident.

Listening Session participants also asked: “who is verifying the accuracy of monitoring data, and the efficacy of any monitoring programs.” Community air monitoring data was collected by GHD, a qualified third-party contractor, and verified by US EPA, and their third-party contractors. The community data collected by GHD is publicly available on the Douglas County [website](#)\*

## Regulation

Some residents have asked which governmental agencies regulate the Refinery and where regulatory information can be found. Many government agencies have regulatory oversight of refinery activity, including the United States Environmental Protection Agency, the Wisconsin Department of Natural Resources, and the Occupational Safety and Health Administration, all of which were involved in the response to this incident. Each agency has their own method of making information available to the public.

Emergency Response Plans for the Refinery, which contain response procedures and protocols, information on the chemicals and materials stored on site and address worst case scenarios, are filed with Douglas County Emergency Management. These plans were made available by the county to the public in May and were the subject of a number of media reports.

\*<http://www.douglascountywi.org>

## **Asbestos & Refinery Materials**

Some participants expressed concern about possible asbestos debris and other materials that may have left the site and how they would be “collected and properly disposed.”

During the incident, debris from the Refinery was deposited to areas outside the Refinery, mainly toward the southwest. Most of the material consisted of mineral wool and foam insulation, and some was charred from the fire. Collection of debris outside the fence line from the Refinery incident was complete by the beginning of June. Evaluation of the debris found offsite determined that these materials were not asbestos containing. Any debris collected that was not retained for investigative purposes was disposed of in accordance with applicable regulatory guidelines and at appropriately authorized disposal facilities.

## **Production Process – Hydrogen Fluoride**

Participants at the Listening Session expressed concern about the Refinery’s use of hydrogen fluoride (“HF”) as a catalyst. They expressed interest in better understanding the risk, whether there are other options, and whether there are steps SRC “could take to further reduce these risks.”

HF is used in the production of many products, including refrigerants, pharmaceuticals, aluminum, and plastics. At the Refinery, HF is used as a catalyzing agent in the alkylation process – light hydrocarbons combine in the presence of HF to form alkylate, which is a high octane blending component in gasoline.

HF can be handled safely without adverse risks to human health or the environment if used in accordance with applicable industry risk management practices. No HF was released during the April 26 fire, and multiple safety systems deployed in emergency situations functioned as designed.

We recognize the community’s concerns around HF and are looking at a number of options as part of the rebuild. The HF unit and its safety systems are part of a thorough evaluation currently underway.

## **Water Quality – Drinking Water & Newton Creek**

The proper management of water is a part of every Refinery and there are robust systems in place to address water quality both on and off-site. Some Community Listening Session participants asked questions about their drinking water and also wondered “how effective are water filtration for polycyclic aromatic hydrocarbons (PAH).” The fact that booms were deployed to Newton Creek also raised concerns about that water body and others.

Officials from Superior Water, Light and Power did extra testing with an independent lab and confirmed that the area's drinking water is safe. Cited in SWL&P An Allete Company (May, 2018) *Independent lab tests affirm safety of Superior Water, Light and Power water*, 21080518 News Release. Superior, WI

The Refinery has its own self-contained drainage system with a wastewater treatment plant. Water is contained on site and run through a permitted treatment process before it is discharged. First responders used firefighting foam while fighting the fire, and some of the foam contained Per- and Polyfluoroalkyl Substances (collectively known as PFAS). In order to treat the PFAS, SRC installed an additional treatment system to its wastewater treatment process that consisted of specialized granular activated carbon filtration followed by a resin. This treatment has proven to be effective in treating for PFAS in water.

Water samples collected from Newton Creek post-incident are comparable to baseline samples collected prior to the incident under normal Refinery operating conditions, with the exception of trace amounts of PFAS. After months of natural attenuation from rains and clean discharge from the facility, levels of PFAS have been reduced further. SRC will continue to monitor as well as work closely with Wisconsin Department of Natural Resources to protect local water bodies. The Superior Refinery continues to work directly with WDNR to ensure that modifications to the wastewater treatment process for PFAS are made appropriately and properly address the issue.

## **Turnaround**

The April 26 fire occurred as the Refinery was commencing a “turnaround,” which raised questions about what a turnaround entails and whether it “cause(s) any greater risk to the Refinery or community.”

A turnaround is a period of intense maintenance activity where refinery process units are shut down, inspected and repaired, if necessary. During this planned maintenance timeframe, other planned activities can also take place such as installation of new or modified process equipment. The specialized nature of the work means there are a lot more contractors on site, which can mean an increase in traffic or noise. Husky provides information on regularly planned turnarounds in its annual guidance. The Superior Refinery also notifies regulators and community officials of the turnaround activity. The nature of turnarounds is such that extra precautions are taken, and safety is always a priority for SRC regardless of whether a refinery is active or in turnaround.

# EMERGENCY RESPONSE

While the events of April 26 caused disruption and concerns, emergency responders, through their professionalism and commitment, brought the fire under control and ensured that the situation did not escalate in scope. The CSB highlighted the effectiveness of the emergency response efforts in a video called *Emergency Response Safety Message* released on November 2 which can be viewed on their website at <http://www.csb.gov>

## April 26th Fire

Participants asked whether the root cause of the incident has been determined, and expressed interest in seeing a “final report” of the investigation.

The Chemical Safety Board (CSB) and the Occupational Safety and Health Administration (OSHA) both pursued independent investigations, as has SRC. OSHA has completed its work and SRC continues to work with both OSHA and CSB on any follow-up matters.

On August 2nd the CSB released a Factual Update to its investigation into the cause of the April 26th incident. SRC has reviewed the Factual Update and will continue to work with the CSB to understand the root cause. While the CSB update is preliminary, the CSB's investigation is important to understanding what happened.

The safety of our employees and the surrounding community remains a priority and we will continue to work collaboratively with the CSB and other investigating agencies.

## Fire Response

Some residents have specific questions about evacuation plans and lessons learned for response to fire events. SRC believes those questions are best posed directly to Douglas County Emergency Management as they take the lead in such circumstances. SRC is not authorized to evacuate community citizens or facilities.

## Emergency Events

Ensuring hazardous materials are handled responsibly is another critical concern in the community. SRC complies with applicable regulations governing the handling of hazardous materials. The company also regularly partners with local municipalities in a variety of arrangements from mutual aid to joint emergency drills, including specialized training for first responders. SRC is cooperating fully with ongoing investigations being conducted by the CSB, OSHA, and other agencies.

## **Evacuation**

The mandatory evacuation order raised questions among Superior residents about who makes evacuation decisions and where evacuation plans can be found. Those questions are best answered by Douglas County Emergency Management since they would be the agency in charge. SRC is not authorized to evacuate community citizens or facilities. However, SRC has participated in, and will continue to cooperate with all after-action reviews.

## **Plume**

Participants at the Listening Session asked questions about whether there was a relationship between the area of the visible smoke cloud, or plume, and the evacuation zone. Although the asphalt fire led to a visible smoke plume, the plume itself did not define the size or location of the evacuation zone. Rather, the evacuation was initiated by Douglas County and the zone was determined based on the direction and speed of the wind. Based on air quality monitoring, conditions were within regulatory guidelines. Visual evidence suggests the smoke rose and dissipated in the atmosphere.

## **Communication & Information**

After the events of April 26, residents expressed interest in better understanding if “evacuation plans exist” and how they are communicated to the public. There has been an after-action review by the emergency response agencies involved and there are areas identified for improvement. The Douglas County Office of Emergency Management maintains the emergency response plans for SRC and others, all of which are publicly available. Any concerns about the evacuation plans should be raised with the Douglas County Office of Emergency Management.

## **Community – Future Response**

Moving forward, it is clear the Superior community has a common interest in being prepared for emergencies and residents have expressed a willingness to step forward to facilitate greater discussion and openness between government, industry, and citizens. SRC is supportive of constructive, open and respectful dialogue with neighbors, and we look forward to playing a role in ensuring a safe and strong community.

# ENVIRONMENTAL PROTECTION

Community members also voiced environmental concerns following the incident. The Superior Refinery worked hard to properly test and monitor environmental impacts throughout the incident and continues that critical work today.

## Testing & Monitoring

Participants at the Listening Session asked questions about testing of air and water, and how long the testing would continue. Even before the April 26 incident, the Superior Refinery regularly tested and monitored environmental parameters as part of its business and as a regulatory requirement. However, during and after the incident, testing and monitoring has played an increased role in properly assessing and responding to any issues.

The Superior Refinery has collected over 88,000 air monitoring readings in the community and a total of over 200 million readings since the incident, all of which were within regulatory guidelines. Air monitoring readings were collected 24 hours a day, 7 days a week in the community and at the Refinery through May 25, 2018. The monitoring program was reduced as the site was stabilized, and continuous 24/7 air monitoring was discontinued as of November 16. We continue to monitor as necessary during the ongoing recovery work at the Refinery and procedures are in place to reinstate monitoring in the community in the event that ongoing activities cause air emissions that may extend beyond the site fence line. In addition, SRC has been regularly collecting surface water samples from the onsite storm water ponds, the wastewater treatment system, and at multiple locations along the length of Newton Creek. SRC is using GHD and Barr Engineering as its third party independent contractors for air and water testing.

## Air Quality

At the Listening Session, a question was raised about the “air conditions during the fire” and whether air quality data would be made available to the public. Between April 26 and June 19, 2018, the Superior Refinery conducted monitoring of air quality for workers at the Refinery and the surrounding community. SRC deployed 26 air monitoring units at and around the Superior Refinery site to continuously monitor air quality. Community air monitoring readings were also collected by mobile teams with hand-held air monitoring equipment. Refinery air monitoring readings were collected using fixed air monitoring and handheld equipment located along the Refinery fence line and in various locations within the Refinery where stabilization operations were occurring. All community air monitoring results were provided to Douglas County for distribution to the public. Fence line air monitoring results were reported to the United States Environmental Protection Agency (USEPA), the Wisconsin Department of Natural Resources (WDNR), and Douglas County.

None of the air quality monitoring showed concentrations above health-based thresholds, and US EPA has publicly confirmed these findings.

## **Soil**

Another area of concern, especially among local gardeners and farmers, was the health of local soil, with a question being raised regarding “how long will it take for potential contaminants like polycyclic aromatic hydrocarbons (PAHs) to degrade.”

The Douglas County Department of Health and Human Services and the Wisconsin Department of Health have provided information on soil and gardening, which can be found at the Douglas County website. As further explained in the July 5, 2018 memo from the Wisconsin Department of Health’s Chief Toxicologist, no soot deposition was observed. Moreover, while no soil sampling was conducted, “soil sampling would not have been useful in distinguishing PAH (polycyclic aromatic hydrocarbon) deposition from the fire from any prior disposition.” The memo goes further to explain that “some degree of daily exposure (to PAH) is unavoidable” in an urban environment like Superior-Duluth where “there would be many sources of those PAHs, and identifying any single source is typically impossible.” It goes on to state: “We do not have reason to believe soils or livestock in the areas downwind from the fire have been affected in any way that should alter gardening or farming practices or the use of agricultural products from those areas.”

## **Wildlife**

The Superior Refinery is located in an area surrounded by large fields and open spaces. It is not uncommon to find wildlife within the fence line, which became a concern requiring increased attention during the incident. Protections and deterrents for wildlife, including fencing, flagging, canine patrols, and laser stations were installed. A laser light system, using lasers mounted on tripods to create a programmed pattern, has proven successful in deterring birds, particularly at night. An animal rehabilitation facility, authorized by U.S. Fish and Wildlife Service, treated wildlife impacted by the incident on site. Wildlife fatalities attributed to the event are two rabbits, one weasel, one fawn, three grackles, four robins, one starling, one American bittern, two geese, one redwing blackbird, four small unidentified birds and two frogs.

One adult killdeer and two chicks, one robin and one water vole have been successfully cleaned and released. Additionally, three mallards, five geese and four goslings have been successfully treated and cleaned in the on-site rehabilitation facility and released at the Douglas County Wildlife Area. Several on-site families of geese have also been safely relocated to the wildlife area.

## Firefighting

The use of firefighting foam in putting out the fire at the Superior Refinery was critically important. Participants at the Listening Session asked what was in the foam and whether it presents environmental concern. Firefighting foam is very important, in part because it can remove oxygen from the fire and prevent the release of vapors. As with many chemicals, there are constituents that are potentially harmful if ingested. Most of the foam used contained chemical components collectively known as Per- and Poly Fluoroalkyl Substances (collectively known as “PFAS”). This compound has been gaining a lot of attention among environmental experts and the media since the EPA has asserted “there is evidence that exposure to PFAS can lead to adverse human health effects.” Therefore, SRC paid extra care and specifically assigned targeted resources to understand and address this issue.

Since the incident we have been regularly collecting surface water samples from our on-site storm water ponds, wastewater treatment system, and at multiple locations along Newton Creek. Water samples collected from Newton Creek post-incident to date are comparable to baseline samples collected prior to the incident under normal refinery operating conditions except for trace amounts of PFAS. A treatment system designed to remove PFAS-related compounds from the water collected on site began operating on May 25th. After months of natural attenuation from rains and clean discharge from the facility, levels of PFAS in Newton Creek have been significantly reduced. SRC will continue to operate the PFAS treatment system, collect monitoring samples and work closely with Wisconsin Department of Natural Resources to ensure all proper procedures are followed to protect local water bodies from PFAS compounds. The Superior Refinery worked directly with WDNR in ensuring that modifications to the wastewater treatment process to treat for PFAS were made appropriately and properly addressed the issue.

## Accuracy of Information

Community members noted that there seemed to be “conflicting information” being provided by various sources related to environmental impacts. SRC has provided data regarding air and water quality, and will continue to refer people to government sources for available information. The Douglas County Department of Health and Human Services has been responding to concerns from the beginning and continues to update its website with new information as it becomes available.

One such example of a [particular update](#)\* is the posting of a memo from Robert Thiboldeaux, Senior Toxicologist from the Wisconsin Department of Health Services. The memo deals primarily with PAHs and any possible effects to plants and animals.

\* <https://www.douglascountywi.org/DocumentCenter/View/8892/PAH-letter-to-Douglas-County-Health-Officer-5July2018?bidld>

# HEALTH

A major incident like the Superior Refinery fire undoubtedly raises questions about possible health risks. While we provide a summary of what we have learned from the sources identified below, it is important that community members seek their own trusted sources of information in making decisions for themselves and their families.

## Exposure

Participants at the UWEX Community Listening Session readily shared their concerns about being safe in their yards and other possible long-term health effects related to the incident, including impacts on the health of plants, animals and livestock. SRC appreciates that people had and continue to have health-based concerns associated with the April 26 fire and resulting smoke plume, and we have waited for the comments of qualified professionals entrusted with public safety before responding to those concerns. In this respect, we have noted that the Senior Toxicologist from the Wisconsin Department of Health Services stated in a July 5, 2018 memo that: “We do not have reason to believe soils or livestock in the areas downwind from the fire have been affected in any way that should alter gardening or farming practices or the use of agricultural products from those areas.” The memo, which is available on the Douglas County website ([www.douglascountywi.org](http://www.douglascountywi.org)), contains a detailed analysis of the health-related issues and concerns from the April 26 fire and is a useful source of information when it comes to exposure related questions, both as to animals and humans.

## Employee Health

While the Superior Refinery employees receive training about the risks associated with working at a manufacturing facility, community members did ask about employees' health. All employees have access to the company health program and those requiring care will continue to receive it.

# SAFETY

Incidents like what happened in Superior can often open people's eyes to the importance of being informed and how essential it is for the community as a whole to educate one another.

## **Safety Record**

Community members have raised questions about SRC's safety record and how events like the April 26 fire could be prevented in the future.

SRC focuses on operational integrity and process safety to protect the public; minimize impact to the environment; safeguard the health and wellbeing of employees, contractors, and customers; and protect physical assets (such as facilities and equipment) from damage or loss.

SRC designs, constructs, and operates equipment and facilities in accordance with applicable safety regulations. We also develop, implement, and continually update procedures in keeping with safe work practices. We train, coach, and supervise our workforce.

To further protect workers and manage risk, the Company requires its workforce to have appropriate qualifications, competencies, and training.

SRC has a goal of zero incidents. Therefore, all incidents are taken very seriously, investigated thoroughly, and changes made with the intention of not just ensuring the incident won't be repeated but also that the organization's safety culture learns and evolves as well.

## **Moving Forward Safely**

The bottom line for many people who came to the Community Listening Session organized by UWEX and who continue to be concerned is they want to make sure this kind of event does not happen again. That message was heard loud and clear.

Safety is the first priority for SRC as we complete work to prepare the site for winter and continue with the design phase of the rebuild process. Robust safety procedures and systems are in place, and all site activity is being conducted with vigilance. Every employee and contractor has the right to stop work if he or she does not feel safe and all work plans go through detailed safety reviews before being initiated.

SRC is cooperating fully with ongoing investigations being conducted by the CSB and OSHA and other agencies.







Superior Refining Company LLC is the owner and operator of the refinery located in Superior, Wisconsin and does business under the licensed and registered trade name "Husky Energy".