State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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WISCONSIN
DEPT. OF NATURAL RESOURCES

January 13, 2025

Matthew Gunn, General Manager, Refining
Cenovus Energy dba Superior Refining Company
2407 Stinson Ave
Superior, WI 54880-4486
Email: matt.gunn@cenovus.com

FID # 816009590
Douglas County

C T Corporation System, registered agent
301 S Bedford Street, Suite 1
Madison, WI 53703

Subject: **NOTICE OF VIOLATION AND ENFORCEMENT CONFERENCE**

Dear Mr. Gunn:

The Department of Natural Resources (department) has reason to believe Cenovus dba Superior Refining Company (SRC) is in violation of state air pollution control laws at the property located at 2407 Stinson Ave, Superior. These violations are being alleged based on a Facility Compliance Evaluation conducted on September 18 and 19, 2024 (inspection) as well as documents received. The department alleges the following violations:

1. **Operation Permit 816009590-P20 Condition I.C.1.a.(1)(b) Emissions from P31 may not exceed 25 ppmvd SO_2 corrected to 0% O_2, on a 365-day rolling average basis. NR 405.08(2), Wis. Adm. Code. A new major stationary source shall apply best available control technology for each air contaminant that it would have the potential to emit in significant amounts.**

Based on the inspection and Air Permit Next Business Day Deviation Notification (NDDN) submitted by SRC on October 3, 2024, the department alleges that SRC exceeded the 365-day average SO_2 emission limit on October 02, 2024.

2. **Operation Permit 816009590-P20 Condition I.C.4.a.(1)(b) Emissions from P31 may not exceed 100 ppmvd CO corrected to 0% O_2 on a 365-day rolling average basis. NR 405.08(2), Wis. Adm. Code. A new major stationary source shall apply best available control technology for each air contaminant that it would have the potential to emit in significant amounts.**

Based on the inspection and NDDN submitted by SRC on October 3, 2024, the department alleges that SRC exceeded the 365-day average CO emission limit on October 02, 2024.

3. **Operation Permit 816009590-P20 conditions: I.C.9.a.(60.105a)(b)(2) the owner or operator shall install, operate, calibrate, and maintain an instrument for continuously monitoring the concentrations of CO_2, O_2 (dry basis), and if needed, CO in the exhaust gases prior to any control or energy recovery system that burns auxiliary fuels. 40 CFR 63.8(c)(4)(ii) Sulfur dioxide, nitrogen oxides, oxygen, carbon dioxide, carbon monoxide, hydrogen sulfide, total reduced sulfur and VOC monitors shall complete one cycle of sampling, analyzing and data recording for each successive 15-minute period. NSPS 40 CFR 60.105a(b)(2) For use in determining the coke burn-off rate for an FCCU, the owner or operator shall install, operate, calibrate, and maintain an instrument for continuously monitoring the concentrations of CO_2, O_2 (dry basis), and if needed, CO in the exhaust gases prior to any control or energy recovery system that burns auxiliary fuels.**

   I.C.9.a.(60.105a)(f) Each owner or operator subject to the NO_X emissions limit in 40 CFR 60.102a(b)(2) for an FCCU install, operate, calibrate, and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis, 0 percent excess air) of NO_x emissions into the atmosphere. NSPS 40 CFR 60.105a(f) Each owner or operator subject to the NO_x emissions limit in 40 CFR 60.102a(b)(2) for an FCCU install, operate, calibrate, and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis, 0 percent excess air) of NO_x emissions into the atmosphere.

   I.C.9.a.(60.105a)(g) The owner or operator subject to the SO_2 emissions limit in 40 CFR 60.102a(b)(3) for an FCCU shall install, operate, calibrate, and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis, corrected to 0 percent excess air) of SO_2 emissions into the atmosphere. NSPS 40 CFR 60.105a(g) The owner or operator subject to the SO_2 emissions limit in 40 CFR 60.102a(b)(3) for an FCCU shall install, operate, calibrate, and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis, corrected to 0 percent excess air) of SO_2 emissions into the atmosphere.

Based on the inspection and the Air Emission Compliance Reports – 3rd Quarter 2023 that SRC submitted on October 30, 2023, the department alleges that SRC failed to conduct continuous emission monitoring and had downtime on monitors for SO_2 at 9.6%, NO_x at 5%, and CO_2 at 7.3% for that quarter.

4. **Operation permit 816009590-P20 Condition I.C.5.a.(1)(b) Emissions from P31 may not exceed 23.7 ppmvd NO_x corrected to 0% O_2 on a 365-day rolling average basis. NR 405.08(2), Wis. Adm. Code. A new major stationary source shall apply best available control technology for each air contaminant that it would have the potential to emit in significant amounts.**

Based on the inspection and NDDN submitted by SRC on October 3, 2024, the department alleges that SRC exceeded the 365-day average NO_x emission limit on October 02, 2024. Based on the NDDN SRC projected to return to compliance on February 24, 2025.

5. **Operation permit 816009590-P20 Conditions I.C.1.a.(1)(c) and (2)(b), and I.C.9.a.(60.102a)(b)(3) Except as provided in I.C.1.a.(1)(d), emissions from P31 may not exceed 50 ppmvd SO_2 corrected to 0% O_2, on a 7-day rolling average basis. Construction permit 19-RAB-057 Condition I.M.1.a.(1)(b) Except as provided in I.M.1.a.(1)(c), emissions from P31 may not exceed 50 ppmvd SO_2 corrected to 0% O_2, on a 7-day rolling average basis. NR 405.08(2), Wis. Adm. Code A new major stationary source shall apply best available control technology for each air contaminant that it would have the potential to emit in significant amounts. NSPS 40 CFR 60.102a(b)(3) Sulfur dioxide (SO_2) in excess of 50 ppmv dry basis**

corrected to 0 percent excess air, on a 7-day rolling average basis and 25 ppmv, dry basis corrected to 0 percent excess air, on a 365-day rolling average basis.

Based on the inspection, Air Emission Compliance Reports – 4th Quarter 2023 submitted by SRC on January 29, 2024 and Air Emission Compliance Reports – 1st Quarter 2024 submitted by SRC on April 29, 2024, the department alleges that SRC failed to limit emissions from P31 to not more than 50 ppmvd SO_2 corrected to 0% O_2, on a 7-day rolling average basis from August 21, 2023 to October 14, 2023 for 168 hours (8.1% of quarter) and January 6, 2024 to February 25, 2024 for 336 hours (25.1% of quarter).

6. **Operation Permit 816009590-P20 Conditions I.C.5.a.(1)(c) and (2)(b) c) Except as provided in I.C.5.a.(1)(d), emissions from P31 may not exceed 45 ppmvd NO_x corrected to 0% O_2 on a 7-day rolling average basis. Construction Permit 19-RAB-057 Condition I.M.5.a.(3)(b) Except as provided in I.M.5.a.(3)(c) NO_x emissions from P31 may not exceed 45 ppmvd NO_x corrected to 0% O_2 on a 7-day rolling average basis. NR 405.08(2), Wis. Adm. Code A new major stationary source shall apply best available control technology for each air contaminant that it would have the potential to emit in significant amounts.**

Based on the inspection, Air Emission Compliance Reports – 4th Quarter 2023 SRC submitted on January 29, 2024 and Air Emission Compliance Reports – 1st Quarter 2024 submitted by SRC on April 29, 2024, the department alleges that SRC failed to limit emissions from P31 NO_x emissions from the FCCU to no more than 45 ppm on a 7-day rolling average basis from August 21, 2023 to November 13, 2023, November 14, 2023 to November 29, 2023 for 1176 hours (56.7% of quarter) and from January 8, 2024 to February 20, 2024 for 168 hours (12.6% of quarter).

7. **Operation permit 816009590-P20 Conditions I.C.4.a.(1)(c) and I.C.9.a.(60.102a)(b)(4) Except as provided in I.C.4.a.(1)(d), emissions from P31 may not exceed 500 ppmvd CO corrected to 0% O_2 on a 1-hour average. NR 405.08(2), Wis. Adm. Code A new major stationary source shall apply best available control technology for each air contaminant that it would have the potential to emit in significant amounts. NSPS 40 CFR 60.102a(b)(4) The owner or operator shall not discharge or cause the discharge into the atmosphere from any FCCU CO in excess of 500 ppmv, dry basis corrected to 0 percent excess air, on an hourly average basis.**

Based on the inspection, Air Emission Compliance Reports – 4th Quarter 2023 submitted by SRC on January 29, 2024 and Air Emission Compliance Reports – 1st Quarter 2024 submitted by SRC on April 29, 2024, and Air Emission Compliance Reports – 2nd Quarter 2024 submitted by SRC on July 29, 2024, the department alleges that SRC failed to limit emissions from P31 CO emissions from the FCCU to not more than 500 ppm on a 1-hour rolling average basis for October 30-31, 2023 for 10 hours, December 3, 2023 for 1 hour, December 18, 2023 for 1 hour, and December 19, 2023 for 1 hour, total of 0.6% of the quarter. And February 14 – 16, 2024 for 38 hours (2.8% of quarter), April 6, 2024, for 1 hour, and May 29 – 30, 2024 for 2 hours, total of 0.1% of the quarter.

8. **Operation Permit 816009590-P20 condition I.C.9.a.(60.105a)(i)(5) Excess emissions are defined as all rolling 7-day periods during which the average concentration of NO_x as measured by the NO_x CEMS under 40 CFR 60.105a(f) exceeds 80 ppmv for an affected FCCU. NSPS 40 CFR 60.105a(i)(5) NO_x excess emissions are defined as: All rolling 7-day periods during which the average concentration of NO_x as measured by the NO_x CEMS under 40 CFR 60.105a(f) exceeds 80 ppmv for an affected FCCU.**

Based on the inspection and Air Emission Compliance Reports – 4th Quarter 2023 submitted by SRC on January 29, 2024, the department alleges that SRC failed to limit emissions on P31 for NO_x from the FCCU to not more than 80 ppm on a 7-day rolling average basis from August 21 to October 14, 2023, and November 18 – 26, 2023 for 336 hours (16.2% of the quarter).

9. **Operation permit 816009590-P20 Condition I.D.1.a.(1)(e)(i) The permittee shall route all sulfur pit emissions so that they are eliminated, controlled, or included and monitored as part of the SRU's emissions subject to the emission limits in I.D.1.a.(1)(b) and I.D.1.a.(1)(c) except as specified in I.D.1.a.(1)(e)(ii). ss. 285.65(2) and (13) Wis. Stats. The department may prescribe conditions for an air pollution control permit to ensure compliance with this chapter and s. 299.15 and rules promulgated under this chapter and s. 299.15 and to ensure compliance with the federal clean air act. NR 405.08(2) Wis. Adm. Code A new major stationary source shall apply best available control technology for each air contaminant that it would have the potential to emit in significant amounts. Paragraph V.H.45 of consent decree 10-cv-00563-bbc: Consent Decree Limits on Sulfur Pit Emissions: The permittee shall route all sulfur pit emissions so that they are eliminated, controlled, or included and monitored as part of the SRU's emissions subject to the NSPS subpart Ja limit for SO_2, 40 CFR §60.102a(f)(1).**

Based on the inspection, NDDN submitted by SRC on 6/26/2024, Air Emission Compliance Reports – 4th Quarter 2023 submitted by SRC on January 29, 2024 and Air Emission Compliance Reports – 1st Quarter 2024 submitted by SRC on April 29, 2024, the department alleges that SRC failed to route all sulfur pit emissions so that they are eliminated, controlled, or included and monitored as part of the SRU's emissions subject to the applicable emission limits. Emissions were not routed to the SRU when the off-gas from the sour water stripper bypassed the SRU to the flare and emissions were released to the atmosphere from the sulfur pit on September 9, 16, 20, 2023, October 20 - 28, 2023, November 1, 2023, January 5, 12, 2024, February 14, 2024, March 19, 2024, April 4 - 10, 2024, May 2 - 15, 2024, November 25 – 28, 2024 and January 5 – 6, 2025.

10. **Operation permit 816009590-P20 condition I.D.1.a.(1)(b)(i) When sulfur input to the SRU is equal to or exceeds 0.250 long tons of sulfur averaged in any hour, emissions shall not exceed the limit in I.D.1.a.(1)(b)(i) or I.D.1.a.(1)(b)(ii), whichever is lower: (i) 218 parts per million on a dry basis (ppmvd) corrected to 0% O_2, averaged over any 24-hour period or; (ii) The value calculated using the following equation: EBACT = [k1 x (-0.038 x (%O_2)2 + 11.53 x % O_2+ 25.6)] – 100 And condition I.D.8.a.(1) The permittee shall apply Best Available Control Technology (BACT) for Process P20 (the SRU/TGTU/TGC). BACT for greenhouse gases for Process P20 is to comply with the SO_2 BACT for Process P20 in condition I.D.1.a.(1) and (4). NR 405.08(2), Wis. Adm. Code A new major stationary source shall apply best available control technology for each air contaminant that it would have the potential to emit in significant amounts. (Construction Permit 16-RAB-184 condition I.E.1.a. (5)(a))**

Based on the inspection and NDDN submitted by SRC on January 10, 2024, 2023 Period 2 – 07/1/2023 through 12/31/2023 - Semi-Annual Title V Monitoring Report submitted by SRC on January 29, 2024, and 2024 Period 1 - 01/01/2024 through 06/30/2024 - Semi-Annual Title V Monitoring Report submitted by SRC on August 29, 2024, the department alleges that SRC Failed to limit sulfur dioxide and GHG emissions from the SRU (P20) to the lower of the applicable limits based on sulfur input and oxygen enrichment, on a 24-hour rolling average basis on September 15 – 17, 2023 for 4.22 hours, September 19 - 21, 2023 for 4.52 hours, October 20 - 28, 2023 for 200 hours and May 2 – 15, 2024 for 48 hours.

11. **Operation Permit 816009590-P20 condition I.D.11.a.(60.102a)(f)(1) (i) The owner or operator shall not discharge or cause the discharge of any gases containing SO_2 into the atmosphere in excess of the emission limit calculated using Equation 1 of this section. For Claus units that use only ambient air in the Claus burner or that elect not to monitor O_2 concentration of the air/oxygen mixture used in the Claus burner, this SO_2 emissions limit is 250 ppmv (dry basis) at zero percent excess air. NSPS 40 CFR 60.102(a)(f)(1)(i) The owner or operator shall not discharge or cause the discharge of any gases containing SO_2 into the atmosphere in excess of the emission limit calculated using Equation 1 of this section. For Claus units that use only ambient air in the Claus burner or that elect not to monitor O_2 concentration of the air/oxygen mixture used in the Claus burner, this SO_2 emissions limit is 250 ppmv (dry basis) at zero percent excess air. (Construction Permit 16-RAB-184 Permit Condition I.E.1.a.(1)(c))**

Based on the inspection, NDDN submitted by SRC on January 10, 2024, Air Emission Compliance Reports – 3rd Quarter 2023 submitted by SRC on October 30, 2023, Air Emission Compliance Reports – 2nd Quarter 2024 submitted by SRC on July 29, 2024, 2024 Period 1 - 01/01/2024 through 06/30/2024 - Semi-Annual Title V Monitoring Report submitted by SRC on August 29, 2024 and 2023 Period 2 – 07/1/2023 through 12/31/2023 - Semi-Annual Title V Monitoring Report submitted by SRC on January 29, 2024, the department alleges that SRC failed to limit sulfur dioxide emissions from the SRU to the limit calculated using Equation 1 of this section, which was 250 ppmv (dry basis) at zero percent excess air for the periods of September 16 – 17, 2023 for 4.22 hours, September 19 – 20, 2023 for 4.52 hours, October 20-28 for 200 hours, and May 2 – 15, 2024 for 48 hours.

12. **Operation Permit 816009590-P20 condition I.E.5.a.(60.103a)(h) Each owner or operator shall not burn in any affected flare any fuel gas that contains H2S in excess of 162 ppmv determined hourly on a 3-hour rolling average basis. The combustion in a flare of process upset gases or fuel gas that is released to the flare as a result of relief valve leakage or other emergency malfunctions is exempt from this limit. NSPS 40 CFR 60.103a(h) Each owner or operator shall not burn in any affected flare any fuel gas that contains H2S in excess of 162 ppmv determined hourly on a 3-hour rolling average basis. The combustion in a flare of process upset gases or fuel gas that is released to the flare as a result of relief valve leakage or other emergency malfunctions is exempt from this limit.**

Based on the inspection, NDDN submitted by SRC on April 30, 2024, Air Emission Compliance Reports – 1st Quarter 2024 submitted by SRC on April 29, 2024, Air Emission Compliance Reports – 2nd Quarter 2024 submitted by SRC on July 29, 2024, 2024 Period 1 - 01/01/2024 through 06/30/2024 - Semi-Annual Title V Monitoring Report submitted by SRC on August 29, 2024 and 2024 Period 1 - 01/01/2024 through 06/30/2024 - Semi-Annual Title V Monitoring Report submitted by SRC on August 29, 2024, the department alleges that SRC failed to limit the H2S content in the fuel gas combusted in the refinery flare to 162 ppmv (0.1 grains per scf) on a 3-hour rolling average basis on March 24, 2024 for 3 hours, May 2 – 12, 2024 for 33 hours and January 5 – 6, 2025.

13. **Operation permit 816009590-P20 condition I.A.1.a.(1) The permittee may not cause, allow or permit the burning of any fuel gas in any process heater which contains greater than 0.10 grains of H2S per dry cubic foot at standard conditions. NR 417.05, Wis. Adm. Code No person may cause, allow or permit the release into the atmosphere or the burning of any fuel gas in an incinerator-waste heat boiler or process heater which contains greater than 0.10 grains of H2S per dry cubic foot at standard conditions (0.23 grams per dry cubic meter) unless the gases resulting from combustion are treated in a manner which prevents the release of sulfur dioxide to the atmosphere as effectively as controlling**

the concentration of H2S in the fuel gas being burned. (Construction Permit 16-RAB-184 (40 CFR Part 60, Subpart Ja), III.Ja.2(60.102a)(g)(1)(ii).

Based on the inspection, NDDN submitted by SRC on January 10, 2024, Air Emission Compliance Reports – 3rd Quarter 2023 submitted by SRC on October 30, 2023, Air Emission Compliance Reports – 2nd Quarter 2024 submitted by SRC on July 29, 2024, 2024 Period 1 - 01/01/2024 through 06/30/2024 - Semi-Annual Title V Monitoring Report submitted by SRC on August 29, 2024 and 2023 Period 2 – 07/1/2023 through 12/31/2023 - Semi-Annual Title V Monitoring Report submitted by SRC on January 29, 2024 the department alleges that SRC failed to limit the H2S content in the refinery fuel gases used in combustion devices to no more than 0.10 grains per dry scf (162 ppmv) on September 19 – 20, 2023 for 7.18 hours, on April 6, 2024 for 4 hours, on June 21, 2024 for 3 hours, and June 25, 2024 for 6 hours.

14. **Construction permit 16-RAB-184 condition I.J.3.b.(1) The permittee shall conduct a compliance emission stack test for visible emissions from S27A, P27 No. 2 DUF Charge Heater within 180 days of initial operation of Process P27 following the facility changes authorized by construction permit 16-RAB-184. s. 285.65(3) Wis. Stats. Permits shall include requirements necessary to assure compliance with s. 285.63 Wis. Stats.**

Based on the inspection, NDDN submitted by SRC on April 30, 2024, and 2024 Period 1 - 01/01/2024 through 06/30/2024 - Semi-Annual Title V Monitoring Report submitted by SRC on August 29, 2024, the department alleges that SRC failed to conduct initial visible emission compliance testing within 180 days of initial operation following modifications authorized by construction permit 16-RAB-184 from February 2 – 13, 2024.

15. **Operation permit 816009590-P20 Condition I.C.2.b.(6) If the permittee elects to use a PM CEMS to demonstrate compliance with I.C.2.a.(1)(c): (a) The permittee shall install, certify, calibrate, maintain and operate the CEMS in accordance with the provisions of 40 CFR §60.13 that are applicable to CEMS (excluding those provisions applicable only to COMS) and 40 CFR part 60, appendices A and F, and the applicable performance specification test of 40 CFR part 60, appendix B. (c) The PM CEMS shall complete a minimum of one cycle of sampling, analyzing and data recording for each successive 15-minute period. The values recorded shall be averaged hourly. Hourly averages shall be computed from a minimum of 4 data points equally spaced over each one-hour period, except during periods when calibration, quality assurance or maintenance activities are being performed. During these periods, a valid hour shall consist of at least 2 data points separated by a minimum of 15 minutes.**

Based on the inspection and Air Emission Compliance Reports – 1st Quarter 2024 submitted by SRC on April 29, 2024, the department alleges that SRC failed to conduct continuous emission monitoring on the PM CEMS monitor from January 1, 2024, to April 29, 2024 - downtime of 19.7%.

16. **Operation Permit 816009590-P20 Condition I.D.1.a.(4) Whenever gases are routed to the TGC, the permittee shall operate the TGC with sufficient temperature and oxygen content to convert sulfur compounds to sulfur dioxide. Construction Permit 16-RAB-184 Condition I.E.8.a.(1) Whenever gases are routed to the TGC, the permittee shall operate the TGC with sufficient temperature and oxygen content to convert sulfur compounds to sulfur dioxide.**

Based on the inspection, NDDN submitted by SRC on January 10, 2024, Air Emission Compliance Reports – 3rd Quarter 2023 submitted by SRC on October 30, 2023, and 2023 Period 2 – 07/1/2023 through 12/31/2023 - Semi-Annual Title V Monitoring Report submitted by SRC on January 29, 2024 the department alleges SRC failed to operate the SRU tail gas combustor (TGC) with sufficient temperature and oxygen content to convert sulfur compounds to sulfur dioxide from September 15 – 17, 2023 and from September 19 – 21, 2023.

17. **Operation Permit 816009590-P20 Condition I.C.3.a.(1)(b) No emission may exhibit more than 20% opacity or number 1 of the Ringlemann chart except as provided in I.C.3.a.(1)(c). Construction Permit 19-RAB-057 condition I.M.3.a.(1)(a) no emission may exhibit more than 20% opacity or a number 1 on the Ringlemann chart except as provided in I.M.3.a.(1)(b). Construction Permit 19-RAB-057 I.M.3.a.(1)(a)**

Based on the inspection, NDDN submitted by SRC on December 13, 2023**,** Air Emission Compliance Reports – 3rd Quarter 2023 submitted by SRC on October 30, 2023, Air Emission Compliance Reports – 1st Quarter 2024 submitted by SRC on April 29, 2024, Air Emission Compliance Reports – 4th Quarter 2023 submitted by SRC on January 29, 2024, Air Emission Compliance Reports – 2nd Quarter 2024 submitted by SRC on July 29, 2024, 2024 Period 1 - 01/01/2024 through 06/30/2024 - Semi-Annual Title V Monitoring Report submitted by SRC on August 29, 2024 and 2023 Period 2 – 07/1/2023 through 12/31/2023 - Semi-Annual Title V Monitoring Report submitted by SRC on January 29, 2024 the department alleges that SRC failed to limit visible emissions from the FCCU stack to 20% opacity or a number 1 on the Ringlemann chart for the following dates:

2023: August 28 – October 13, October 30 – 31, November 9, 14, December 5, 12, 18 and 26.

2024: January 5, 6, 11, February 14 – 19, March 1, 14, 15, 21, April 12, 16, 23, May 2, 16, 24, 25, June 21, September 9, 10, 12, 17, 19, 21, 23, 24, 25 and 29.

We have scheduled the following Enforcement Conference to discuss this matter in more detail:

Teleconference Date and Time:	February 4, 2025, at 11 a.m.
Teleconference Information:	Telephone Number: (608) 571-2209 Conference ID: 542700361#

Please note this is a teleconference. At 11:00 a.m. call the telephone number listed above and when prompted enter the conference ID. This will connect you to the enforcement conference.

We request you attend the Enforcement Teleconference as it is an important opportunity to discuss the circumstances surrounding the alleged violations and to learn your perspective on this matter. Please note that in an effort to encourage a candid and productive conversation, attendance is limited to you, your legal counsel and others with the technical expertise necessary to understand, evaluate and correct the violation.

The department's enforcement decision will be based upon available information if you do not attend the Enforcement Teleconference.

Please be advised that violations of ch. 285, Wis. Stats., may be referred to the Department of Justice to obtain court ordered compliance and penalties up to $25,000 per day of violation. Each day of violation is a separate

offense. Please be advised that the violations alleged in this notice are also enforceable by the United States Environmental Protection Agency.

If you have questions or need to reschedule the conference, please contact me at (608) 640-0438 or Jennifer.mcdonough@wi.gov.

Sincerely,

Environmental Enforcement Specialist

cc: Michalee Leuthard – DNR, Fitchburg
Randy Matty – DNR, Green Bay
Maria Hill – DNR, Madison
Michael Moran – DNR, Milwaukee
David Beattie – Superior Refining Company, Environmental Manager