

COPY

September 26, 2013

Karl Beaster
Enbridge Energy
1320 Grand Avenue
Superior WI 54880

SUBJECT: Technical Assistance Request - Review of Site Investigation and Response Action Plan
Enbridge Energy Superior Terminal (Facility Wide), Superior, WI
WDNR BRRTS Activity #: 02-16-560657

Dear Mr. Beaster:

Purpose

The purpose of this letter is to provide you with a response to the technical assistance request submitted for the Enbridge Energy Superior Terminal located at 2800 East 21st Street ("the Property"). The Property consists of numerous parcels and is located in Sections 30 and 31, Township 49 North and Range 13 West, and Section 36, Township 49 North and Range 14 West. The Property includes approximately 560 acres of land located in the City of Superior, in Douglas County.

Request

On June 27, 2013, you requested that the Department of Natural Resources ("the Department") review and approve a Site Investigation and Response Action Plan, Proposed Risk-Based Site Wide Approach, prepared by Barr Engineering. The purpose of the submittal is to provide the technical basis for a proposed negotiated agreement that would result in the use of a performance standard as a remedial action to address the groundwater pathway for releases at the Superior Terminal.

This letter will communicate what additional information the Department will need in order to determine if the Site Investigation and Response Action Plan will meet the requirements under the ch. NR 700 rule series, Wis. Adm. Code. The Department received the appropriate fee for providing technical assistance, in accordance with s. NR 749.04(1), Wis. Adm. Code.

Review and Requested Revisions to the Site Investigation and Response Action Plan

After a preliminary review of the submittal, we have the following comments and suggested revisions. We envision issuing a formal final approval when the following items have been addressed.

General Comments

- Please add wording to the Executive Summary and in Section 1.4.2 stating that in accordance with the requirements in s. NR 720.19(2), Wis. Adm. Code, you are choosing to establish site

hydrogeology as a performance standard for remedial actions at the Property in order to address the groundwater pathway, and utilizing the site monitoring well network for field verification of the performance standard.

- Please also clarify in the Executive Summary that the submittal of the Site Investigation and Response Action Plan is to provide technical justification for your choice of remedial action by illustrating site conditions, to seek approval for the proposed monitoring well network that will be used for field verification, and to outline the proposed response actions that will be taken to address releases under the chosen remedial action.

Site Investigation

- Please include a brief summary of existing contamination on the property, and include a map illustrating degree and extent of existing soil and groundwater contamination.
- For any figures depicting the site monitoring wells, please provide corrected maps by removing MW-13 (recently abandoned) and adding MW-16 (not depicted on previous figures).
- In section 1.5.1, Groundwater Monitoring Network and Discussion of Existing Data, update the information on boring logs to explain that the historical well logs that are not included in Appendix C were not included because they were unable to be located.
- Proposed Groundwater Monitoring Program (Section 1.5 and Appendix E) –
 - Given the size of the facility, and the potential for releases anywhere on the facility, additional wells are required to confirm the presence or absence of groundwater impacts. We would like to request additional wells to define both the horizontal and vertical extent. Please add additional monitoring wells in the locations depicted on the attached map.
 - Please overlay the Terminal Property Boundary on Figure 15.
 - Modify sampling parameters for all monitoring wells to include PVOCs and Naphthalene instead of BTEX and DRO.
 - Increase sampling frequency at all wells to semiannual.
 - In Section 1.5.4, Response to Detections in Samples, add information detailing response procedures when a preventive action limit or an enforcement standard is attained or exceeded in one of the site monitoring wells, in accordance with s. NR 140.24 and s. NR 140.26, Wis. Adm. Code.

Response Action Plan

- In Section 2.2, Initial Response Actions, you propose the use of 10 ppm (organic vapor headspace, measured as isobutylene equivalence using a PID) screening level for definition of excavation extent, and as criteria for confirmation sampling. In order for us to evaluate the adequacy of this proposed field screening method, please provide documentation for compound-specific correlation between PID values and laboratory analytical results

Please modify the confirmation sampling criteria, such that confirmation sampling would not be required if PID values are <10 ppm and the area is < 100 ft², but would be required for releases above those criteria.

Modify soil sampling parameters to eliminate DRO and include PVOC and naphthalene.

Although the proposed response plan will utilize a performance standard to address the groundwater pathway, you will still need to define the degree and extent of soil contamination, including vertical extent (i.e. below 4 feet). This will be necessary to meet the requirements in s.

NR 716, Wis. Adm. Code, and to provide documentation of soil contamination for the GIS Registry.

- Modify Section 2.4.1, Exceptions Where Site-Wide Risk Based Approach May Not Be Applicable, to include the following:
 - Change first sentence to read: “Additional investigation, remedial action, and institutional controls...”
 - Include releases where structural impediments exist as one of the conditions in the second sentence.
 - Change the last sentence to read: “Additional investigation and remedial action...”

Based on the above comments, please provide a revised draft of the Site Investigation and Response Action Plan for Department review. Please include a draft of the proposed negotiated agreement, so that we may begin the process of finalizing the wording of the agreement while we work on obtaining RR management team approval for the final site-wide plan.

The Bureau for Remediation and Redevelopment Tracking System (BRRTS) identification number for this activity is shown at the top of this letter. The Department tracks information on all determinations such as this in a Department database that is available on the Internet at <http://dnr.wi.gov/org/aw/rr/>. See “BRRTS on the web” under “Contaminated Land Databases”.

If you have questions, please contact me at 715-392-3126 or via email at erin.endsley@wisconsin.gov. Thank you for your cooperation.

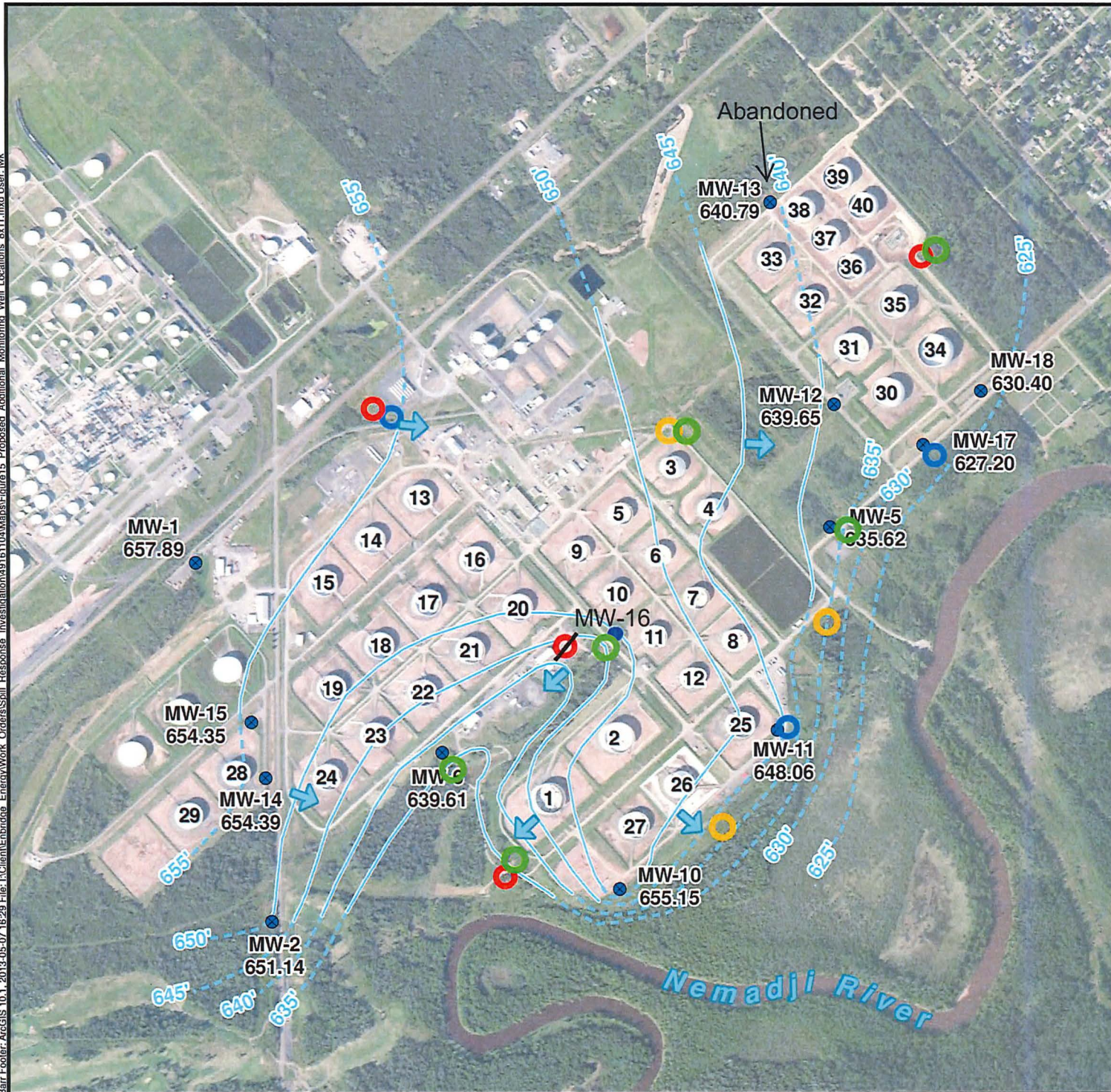
Sincerely,



Erin Endsley
Hydrogeologist
Remediation & Redevelopment Program

cc: Lynette Carney, Barr Engineering
John Robinson
Mark Gordon
John Sager

Barr Footer: ArcGIS 10.1, 2013-05-07 16:29 File: I:\Client\Enbridge_Energy\Work_Orders\Spill_Response_Investigation\49161104\Maps\Figure15_Proposed_Additional_Monitoring_Well_Locations_8x11.mxd User: hvk



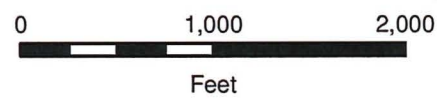
- Proposed Piezometer
- Proposed Shallow Well
- Monitoring Well Location and Groundwater Elevation (ft)
630.40
- Groundwater Contour
Dashed where inferred (Contour Interval = 5.0 ft)
- ➔ Inferred Groundwater Flow Direction

Monitoring well groundwater elevations were measured on September 26, 2012

Note:
Monitoring well locations 17 and 18 are newly installed and were not used in groundwater contour modeling

DNR Revisions

- proposed shallow well
- proposed piezometer
- ⊘ well not needed



1 Inch = 1,000 Feet
ESRI World Imagery Circa August, 2011

Figure 15

PROPOSED ADDITIONAL MONITORING WELL LOCATIONS SUPERIOR TERMINAL
Enbridge Energy, L.P.
Superior, Wisconsin

