



February 21, 2018

Mr. Karl Beaster
Enbridge Energy
26 East Superior St., Suite 309
Duluth, MN 55802

Subject: Technical Assistance Request Response
Facility-Wide Site Investigation and Remedial Action Plan
Enbridge Energy Superior Terminal, Superior, Wisconsin
BRRTS # 02-16-560657

Dear Mr. Beaster,

On September 16, 2017, on behalf of the Enbridge Energy Superior Terminal (Facility), you submitted documentation requesting technical assistance from the Wisconsin Department of Natural Resources (DNR). The technical assistance request is regarding review of the following documents:

- A completed DNR form 4400-237, Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request with cover letter.
- *Site Investigation and Response Action Plan – Enbridge Energy Superior Terminal (Facility Wide)*, dated August 2017, by Barr Engineering Company (Barr).
- *Addendum to: Site Investigation and Response Action Plan – Enbridge Energy Superior Terminal (Facility Wide)*, dated August 2017, by Barr.
- Review fee of \$1050 (Enbridge check #3007003857, dated September 5, 2017). This fee is in conformance with requirements in Wis. Admin. Code §NR 749.04(1) for review of a Remedial Action Options Report.

The purpose of this correspondence is to provide comments to the documents submitted regarding meeting the requirements of Wis. Admin. Code §§ NR 700–754.

Facility Background

The Facility is located at 2800 East 21st Street and consists of numerous parcels located in Section 30 and 31, Township 49 North, Range 13 West and Section 36, Township 49 North, Range 14 West, City of Superior, Douglas County, Wisconsin. The facility covers approximately 560 acres.

The following is a general understanding of the historic background of the Facility:

- The Facility went online as a pipeline terminus and petroleum storage facility owned by Interprovincial Pipe Line Company (IPL) in 1950. The pipeline brought crude oil from Alberta, Canada to Superior.
- In the 1960's Lakehead Pipeline Company (Lakehead) became the US subsidiary of IPL, and the Facility was known as Lakehead Terminal.
- In 1998 Lakehead became part of Enbridge Energy Inc.

Historic release sites have been, and may continue to be, encountered at the Facility. Additionally, new releases at the Facility may occur in the future. Because of this and the geologic setting where the Facility is located, on more than 100 feet of low permeability clay, Enbridge proposed a streamlined response to release incidents, either historic or new, encountered in the future.

This streamlined response to individual releases was originally proposed in the *Site Investigation and Response Action Plan and Proposed Risk-Based Site Wide Approach* dated June 2013 by Barr Engineering Company. The June 2013 document was intended to describe geologic/hydrogeologic conditions over the entire Facility and set the framework for the facility-wide response action plan. The basic concept of the proposed response action is as follows:

- When a release is discovered it is reported to the DNR.
- The release would be remediated with regard to free-product and direct contact with contaminated soils.
- Regarding remediation for protection of groundwater, site conditions would be utilized as a performance standard under Wis. Admin Code §NR 720.08.
- A network of groundwater monitoring wells would be established around the perimeter of the Facility boundary.
- Conducting groundwater monitoring to evaluate the effectiveness of the performance standard.
- Each individual release site not able to be closed due to structural impediments not allowing for complete investigation or cleanup or remaining contamination greater than soil to groundwater Residual Contaminant Levels (RCLs) would be tracked with submittal of a GIS information package under a facility wide BRRTS # (02-16-560657). Please note: The DNR has discontinued the use of the term “GIS Registry”; we now refer to such obligations as the Continuing Obligations database.

A request for technical assistance was made by Enbridge for a review/approval of the June 2013 document. A September 26, 2013 correspondence from the DNR was issued to address the requested assistance. The September 26, 2013 correspondence made general comments and made specific comments to both the Site Investigation and to the Response Action Plan portions of the report.

Barr incorporated comments from the September 26, 2013 DNR correspondence into the document, *Site Investigation and Response Action Plan Enbridge Energy Superior Terminal (Facility-Wide)* (SI/RAP) dated July 2014. A September 19, 2014 correspondence from the DNR determined the SI/RAP would meet requirements under Wis. Admin. Code §§ NR700 – 754 and would approve the SI/RAP with conditions as stated in the September 19, 2014 correspondence.

Request

The September 16, 2017 request for technical assistance was made by Enbridge with submittal of the August 2017 Addendum to the SI/RAP. Specifically, Enbridge requested final approval of the SI/RAP including the proposed Facility-Wide Response Action Plan. As approval of the SI/RAP was given with conditions set forth in the September 19, 2014 correspondence, this review focuses on the fulfillment of the conditions as documented in the September 2017 Addendum to the SI/RAP. The September 19, 2014 correspondence is included as Attachment A to this correspondence. In addition, this correspondence will also provide general procedures and responsibilities in implementing the Facility-Wide Response Action Plan.

The twelve (12) conditions set forth in the September 19, 2014 correspondence are following, the DNR comments, considering the information in the September 16, 2017 Addendum to the SI/RAP are in italics.

1. The SI/RAP covers petroleum releases where Enbridge is responsible under Wis. Stats. § 292.11(3) and the release is confined to the Property (Facility). *No additional comments.*
2. For emergency, immediate and interim actions taken under NR 708, Wis. Adm. Code, the horizontal and vertical extent of contamination will be defined visually and with the use of a photoionization detector (PID) at the time of the emergency, immediate or interim action. All necessary action will be taken to

recover free product and to eliminate the direct contact contaminant pathway. The immediate and interim actions will typically be excavation and disposal of contaminated media. A PID equipped with an 11.7 eV lamp will be used to guide the excavation and determine the extent of the direct contact risk. Standard practices for headspace analysis of soil samples will be used to analyze soil samples. A 10 ppm PID concentration will be used to identify contaminated soil for removal and as a soil screening criteria to determine if additional sampling is necessary. *In Section 4.0 of the Addendum to SI/RAP requests the use of either a 10.6 eV or an 11.7 eV PID lamp. That request is approved. The use of the 10 ppm PID concentration as a soil screening criteria will remain. Also, as a clarification, please note that a PID cannot by itself determine direct contact risk. If evidence of contamination remains based on the results of soil screening then sampling will be necessary to determine remaining direct contact risk.*

3. Confirmation soil samples will be collected for laboratory analysis following NR 708, Wis. Adm. Code, actions for reportable spills in areas where contamination remains based on observation and PID analysis. Confirmation soil sample(s) will be analyzed for PVOCs and naphthalene. Soil samples will be collected from the base and sidewalls of an excavated area as necessary to adequately determine the degree of remaining contamination. The DNR may request laboratory analysis of confirmation soil samples, additional samples and/or analytical parameters based on the size, type and complexity of the release. In general, the DNR will not request laboratory analysis of confirmation soil samples for non-reportable spills where an emergency and immediate action has been conducted according to the SI/RAP and this letter. *Section 2.2.2, Response Actions of the July 2014 SI/RAP details confirmation sampling which comply with this comment.*
4. The lateral extent of observed impacts following a Wis. Admin. Code §NR 708 action, determined as stated above, will be used to document areas of remaining contamination if a GIS (*Continuing Obligation Package*) package is needed to document remaining contamination for addition to the facility wide ERP site and GIS Registry (*Continuing Obligation Database*). *Section 2.2 in the September 2017 Addendum to SI/RAP clarifies this condition.*
5. Appropriate action will be taken under Wis. Admin. Code § NR 708 to address the direct contact pathway in areas identified to have contamination from historical releases. Following any action taken under Wis. Adm. Code § NR 708, and collection of confirmation soil samples as outlined above, the DNR will determine if additional investigation is needed to define the degree and extent of contamination under Wis. Admin. Code § NR 716, to define the source, degree and extent of soil contamination as necessary to determine whether the performance standard is an appropriate remedial action for the release. *Documents contained in Appendix H of the September 2017 Addendum to SI/RAP address this condition by clarifying the Facility-Wide Response Action Plan procedures.*
6. A performance standard is being used as a remedial action to address the soil to groundwater contamination pathway. If evidence becomes available to show the performance standard is not adequate to protect groundwater quality the DNR may require additional investigation of the degree and extent of contamination at potential source areas including areas with remaining contamination following actions taken under NR 708 Wis. Adm. Code to address contamination. The DNR may request additional remedial action once it is determined the source area or areas causing the performance standard to fail. *Documents contained in Appendix H of the September 2017 Addendum to SI/RAP address this condition by clarifying the Facility-Wide Response Action Plan procedures.*
7. Section 1.5.2 of the SI/RAP states that groundwater will be sampled annually as part of the Groundwater Monitoring Plan. Appendix E, Groundwater Monitoring and Program Sampling and Analysis Plan, states groundwater will be sampled annually. The DNR expects semi-annual groundwater sampling will be conducted according to the plan in Appendix E. *In Section 4.0 of the September 2017 Addendum to SI/RAP it states, "Enbridge has agreed to complete semi-annual groundwater sampling as requested by*

the WDNR with the understanding that once a baseline is established the monitoring frequency will be renegotiable". This response complies with the condition.

8. The DNR retains the ability to require additional site investigation and/or remedial action for hazardous substance releases on the Facility if information becomes available that shows the site investigation, remedial action plan and/or the Performance Standard does not comply with Wis. Stat. § 292 and/or Wis. Adm. Code §§ NR 700-754. *No additional comments.*
9. The DNR will consider the range of options available under NR 140.24 and NR 140.26 Wis. Adm. Code when a NR140 Preventive Action Limit or Enforcement Standard is attained or exceeded in analysis of water samples collected from the monitoring wells installed to monitor the Performance Standard. *No additional comments.*
10. The Department approves the groundwater monitoring well network depicted in the attached figure, "Proposed Additional Monitoring Well Locations". We understand some of the wells were installed this year with the remainder of the wells to be installed in 2015. The SI/RAP approval is contingent upon all wells on the attached map being installed and sampled according to the Groundwater Monitoring Plan. Please submit all documentation required under Wis. Admin. Code § NR 141 upon completion of construction of the remaining wells. *In Section 2.1 of the September 2017 Addendum to SI/RAP it is stated three (3) water table wells (MW-24A, MW-25A and MW-26) and six (6) deep piezometer (MW-5B, MW-6B, MW-22B, MW-23B, MW-24B and MW-25B) were installed as part of the Facility-Wide monitoring network.*
11. The Department may request additional monitoring wells if it is shown that the monitoring well network is not sufficient to evaluate the Performance Standard proposed in the SI/RAP. *No additional comments.*
12. This SI/RAP is conditionally approved contingent upon the execution and implementation of a negotiated agreement between Enbridge and the DNR. If the pending Negotiated Agreement (NA) is not finalized or the negotiated agreement is terminated, each hazardous substance release will be regulated by the DNR as a separate Spill or Environmental Repair site. *Enbridge and the DNR have been developing a NA for a Facility-Wide Response Action Plan since 2013. The NA is intended to detail responsibilities and procedures associated with the Facility-Wide Response Action Plan. A final NA has not been formalized at this time, further discussion of this follows.*

Facility-Wide Response Action Plan

As mentioned above, a final NA has not been formalized. However response actions to historic and/or new releases have been following the proposed Facility-Wide Response Action Plan procedures since 2013 as evident by the following:

- The DNR has worked with Enbridge to develop an acceptable groundwater monitoring network and Enbridge has installed wells and piezometers to complete the monitoring network..
- Enbridge has completed semiannual groundwater monitoring events documenting performance standard effectiveness.
- A Facility-Wide BRRTS number #, 02-16-560657, has been created. There are currently twenty-three (23) open sites listed under this BRRTS #.

Section 4.0 of the August 2017 SI/RAP addendum contains seven clarifications and updates to the SI/RAP. Below are the clarifications and the DNRs response to the clarifications and updates (italics):

1. The SI/RAP conditional approval letter dated September 19, 2014 references the execution and implementation of a negotiated agreement between Enbridge and the Department. Subsequent conversations and discussions have resulted in the determination that an MOA would be a more appropriate method for establishing an agreement between the two parties. It is the understanding of Enbridge that the MOA will not be contingent upon a negotiated agreement as defined by Wis. Sta. 292.11(7)(d), nor as an “environmental agreement” under Wis. Adm. Code NR 728.07. *After further consideration, the DNR has determined that the agreement between Enbridge and the DNR will be considered a Negotiated Agreement under Wisc. Stats. § 292.11(7)(d) and Wisc. Adm. Code § NR728.07. Language in the draft agreement will be modified to reflect this decision.*
2. Enbridge has agreed to complete semi-annual groundwater sampling as requested by the WDNR with the understanding that once a baseline is established, the monitoring frequency will be renegotiable. *The DNR agrees to reevaluate the groundwater sampling plan following establishment of a baseline.*
3. The WDNR has requested soil headspace screening be completed using a photoionization detector (PID) with an 11.7eV lamp. However, the majority of the petroleum compounds to be targeted as part of this SI/RAP fall within the range of the Ionization Potential (IP) of a 10.6 eV lamp. *The DNR agrees Enbridge should use a PID with an appropriate lamp for the compounds being analyzed.*
4. The SI/RAP conditional approval letter dated September 19, 2014 references actions to be taken under this SI/RAP will follow Wis. Admin. Code §NR 708 actions. It is the understanding of Enbridge that Wis. Admin. Code § NR 708 will be one of the codes that will guide actions under this SI/RAP, but additional actions may also fall under Wis. Stat. ch. 292 and Wis. Admin. Code §§ NR700-754. It is the intent of this SI/RAP and Enbridge to follow the applicable codes and that actions will not be solely limited to Wis. Admin. Code §NR 708. The pre-approved remedy approach outlined in Table 4 of the SI/RAP (Barr, 2014) has been updated to reflect the portion of the code that will apply at each stage and is included as Appendix H. In addition to these updates, we have provided a comparison document that describes how release sites at the Property would be handled with the SI/RAP in place versus without the facility-wide approach. This comparison document has also been included in Appendix H. *The reference in the September 19, 2014 letter was addressing NR708 emergency and immediate actions. It is understood and expected that Enbridge will comply with all applicable requirements of Wis. Admin. Code §§NR700-754 when fulfilling its responsibilities under Wis. Stats. ch. 292.*
5. As part of the SI/RAP and MOA process, Enbridge is requesting that the WDNR establish a tracking system that will allow all eligible sites to be tracked under a single BRRTs number for the facility and allow Enbridge to update the single facility-wide GIS registry with individual release information. It should be clarified that this SI/RAP established the pre-approval need for a remedy as required by Wisc. Admin. Code §NR 724 and that this process will include a formal RAP approval and/or No Further Action (NFA) correspondence from the WDNR for each release site that enters the facility wide GIS registry. *The DNR has established an Enbridge Terminal Facility Wide Environmental Repair Site (BRRTS # 02-16-560675). Discharge sites that meet the criteria established in the SI/RAP will be transferred to this site once it is established the criteria are met. These sites will receive a letter notifying of the incorporation into the facility-wide ERP site and approval for use of the performance standard. Any necessary continuing obligations will be specified at that time. It will be recorded in BRRTS that these sites have been incorporated into the Facility-Wide ERP site and their individual status will be recorded as such.*
6. As part of the SI/RAP implementation and prior to final signature of the MOA, a Regulatory Notification, Classification and Pathway to Closure flow chart will need to be prepared and approved. The purpose of the flow chart is to outline the process by which the RAP approval, NFA and GIS registry update under Wis. Admn. Code §NR 708.09 or §NR 720.05(3) will be completed to avoid any confusion regarding the intent of this process by future Enbridge or WDNR staff. Based on input from the WDNR, a process flow

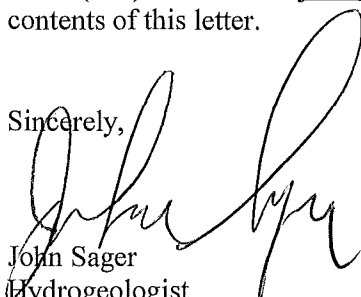
chart has been developed for this purpose and is included in Appendix H of the August 2017 SI/RAP Addendum for review and approval. *The Enbridge Superior Terminal Petroleum Contaminated Sites Regulatory Notification, Classification and Pathways to Closure flowchart documents the process for moving release sites through the regulatory process according to the proposed SI/RAP and appears to comply with applicable sections of Wisc. Admin. Code §§NR700-754. The DNR or Enbridge may need to edit this flowchart in the future if changes are necessary to maintain compliance or if opportunities for efficiencies are identified.*

7. Prior to final MOA approval, a process for updating the Facility-Wide GIS Registry that outlines the required level of detail expected for each update needs to be established. Based on input from the WDNR, a GIS Registry Update Checklist has been developed for WDNR review and approval (Appendix H). The GIS Registry Update Checklist outlines the information required by the WDNR for updating the Facility-Wide GIS Registry with information for each release response, as needed. Appendix H also includes an example GIS site update package for reference. *The update checklist and example will be used to develop the final layout of the GIS Registry Package for the Facility Wide site. The DNR will use the example provided in Appendix H to facilitate DNR internal discussion on the composition and layout of a final Continuing Obligation Package for the Facility-Wide site. The first Continuing Obligation Package for the Facility Wide site will need to contain the applicable information in the DNR's Form 4400-202, Case Closure-GIS Registry. The Facility-Wide site will not be considered for closure at the time of Form 4400-202 submittal but the information will be used to create the initial Continuing Obligation Package.*

The conditions set forth in the September 19, 2014 correspondence have appeared to have been fulfilled as documented in the September 2017 Addendum to SI/RAP except for completion of the NA. The DNR approves this SI/RAP and intends to follow the process set out in the SI/RAP, this approval letter and the DNR's approval letters dated September 26, 2013 and September 19, 2014 as an interim process until the NA is finalized or it is determined by Enbridge or the DNR that the NA will not be completed.

The DNR appreciates the opportunity to work with Enbridge to complete the SI/RAP for this site. Please contact me at (715) 392-7822 or john.sager@wisconsin.gov if you have any questions or have any questions on the contents of this letter.

Sincerely,



John Sager
Hydrogeologist
Remediation and Redevelopment

cc: Lynette Carney (Barr)

COPY



September 19, 2014

Karl Beaster
Enbridge Energy
1320 Grand Avenue
Superior WI 54880

SUBJECT: Facility-Wide Site Investigation and Remedial Action Plan
Enbridge Energy Superior Terminal, 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 ("SI/RAP"), 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.

The Department provided comments and technical assistance on a draft version of the SI/RAP in a letter dated September 26, 2013 and in an email dated January 29, 2014. Based on the information contained in the SI/RAP it appears Barr has incorporated the Department's comments from the above referenced correspondence into the final version of the SI/RAP.

It appears the SI/RAP 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. Based on the information contained in the SI/RAP, the Department approves the SI/RAP with the following conditions:

1. The SI/RAP covers petroleum releases where Enbridge is responsible under 292.11(3) Wis. Stats and the release is confined to the Property.

8. The Department retains the ability to require additional site investigation and/or remedial action for hazardous substance releases on the Property if information becomes available that shows the site investigation, remedial action plan and/or the Performance Standard does not comply with Section 292 Stats. and/or NR 700-NR 754 Wis. Adm. Code.
9. The Department will consider the range of options available under NR 140.24 and NR 140.26 Wis. Adm. Code when a NR140 Preventive Action Limit or Enforcement Standard is attained or exceeded in analysis of water samples collected from the monitoring wells installed to monitor the Performance Standard.
10. The Department approves the groundwater monitoring well network depicted in the attached figure, "Proposed Additional Monitoring Well Locations". We understand some of the wells were installed this year with the remainder of the wells to be installed in 2015. The SI/RAP approval is contingent upon all wells on the attached map being installed and sampled according to the Groundwater Monitoring Plan. Please submit all documentation required under NR141 Wis. Adm. Code for construction of the remaining wells to my attention at the letterhead address.
11. The Department may request additional monitoring wells if it is shown that the monitoring well network is not sufficient to evaluate the Performance Standard proposed in the SI/RAP.
12. This SI/RAP is conditionally approved contingent upon the execution and implementation of a negotiated agreement between Enbridge and the Department. If the pending negotiated agreement is not finalized or the negotiated agreement is terminated each hazardous substance release will be regulated by the Department as a separate Spill or Environmental Repair site.

Please include a draft of the proposed negotiated agreement, along with the appropriate technical assistance fee, 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 facility-wide plan.

The Department appreciates Enbridge's actions to complete the SI/RAP and is looking forward to working with Enbridge to finalize the negotiated agreement. If you have any questions, please contact me at 715-392-3126 or via email at erin.endsley@wisconsin.gov. Thank you for your cooperation.

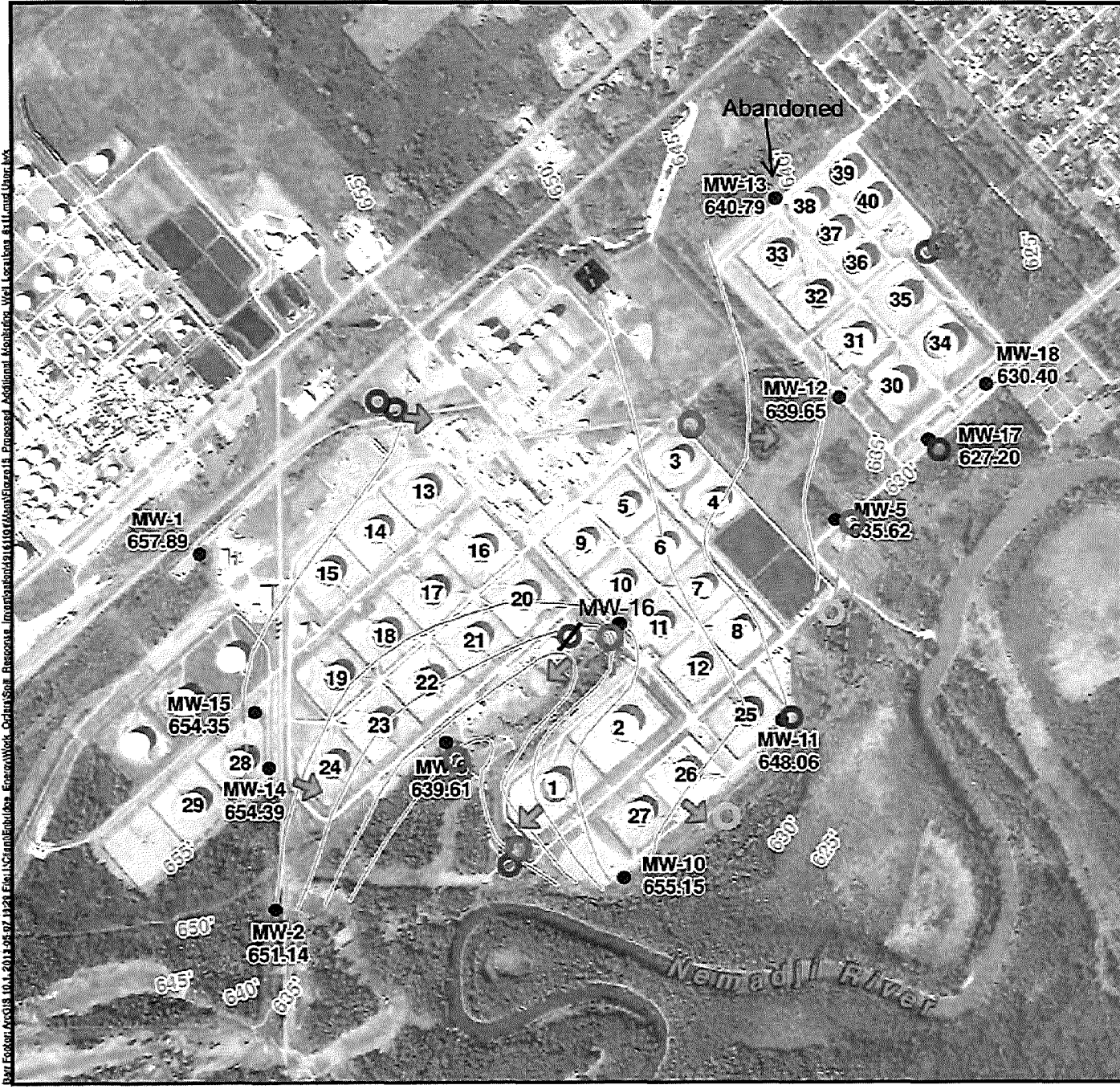
Sincerely,



Erin Endsley
Hydrogeologist
Remediation & Redevelopment Program

Attachment: Figure 15, Proposed Additional Monitoring Well Locations

cc: Judy Fassbender, Wisconsin Department of Natural Resources
John Robinson, Wisconsin Department of Natural Resources
John Sager, Wisconsin Department of Natural Resources
Lynette Carney, Barr Engineering



D:\Ecor\AUG15 10.4.2013\0507 1321 EML\GIS\Map\05 Proposed Additional Monitoring Well Locations - Full Area Map.mxd

- 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



0 1,000 2,000

Feet

1 Inch = 1,000 Feet

ESRI World Imagery Circa August, 2011

Figure 15

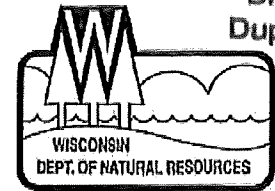
**PROPOSED ADDITIONAL
MONITORING WELL LOCATIONS
SUPERIOR TERMINAL**
Enbridge Energy, L.P.
Superior, Wisconsin



State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Superior Service Center
1701 N. 4th Street
Superior WI 54880

COPY

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7483
TTY Access via relay - 711



BRRTS
Duplicate

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

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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

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

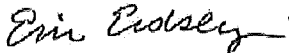
- Modify Section 2.4.1, Exceptions Where Site-Wide Risk Based Approach May Not Be Applicable, to include the following:
 - Change first sentence to read: "Additional investigation, remedial action, and institutional controls..."
 - Include releases where structural impediments exist as one of the conditions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

→ site specific values for defining
date?
→ code reqs.?

