

From: [Nick Larabel](#)
To: [Sager, John E - DNR](#)
Subject: RE: Enbridge Terminal PFAS Statement
Date: Friday, January 21, 2022 11:43:56 AM

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Hi John,

As a follow-up to the email from last May and after speaking to Terminal personnel, we have the following additional information regarding PFAS at the Superior Terminal. Aqueous film forming-foam (AFFF) containing PFAS was historically stored at the terminal from the early 1990s until 2014; located in a portable tank trailer within an enclosed building in the northwestern portion of the terminal. During that time frame and on an annual basis, Enbridge would mobilize the tank trailer to test a tank fire suppression system and conduct a training event. The training event would consist of mobilizing the portable unit containing AFFF to the desired location and connecting piping from the unit to a water line/manifold system near the specific tank being tested. Foam/water was then injected into the tank rim fire suppression system to deluge the top of the tank, then testing was terminated. Following the test, the foam residue was left in place on the tank rim/top and sides, and eventually washed out via precipitation events. It is estimated that between 10 and 20 tanks total since the early 1990s would have been used for training purposes, generally located in the central portion of the terminal. Operations personnel did indicate that Tanks 30 through 45, located in the northeast area of the terminal, were not used for the annual training events. In addition to the annual training events, one small fire event occurred in 2012 near the north portion of the terminal where AFFF was believed to have been used. Additional details regarding the fire were not available.

We are continuing to evaluate the previous operations and the need for additional site characterization. In the interim, a telephone meeting may be appropriate to ensure that we do not delay the outstanding closure requests. Please let us know if your schedule is able to accommodate this request.

Nick

Nicholas B. Larabel, PG, CPG

Environment Advisor, LP US Environment Remediation

ENBRIDGE

TEL: 269-330-3872

455 Leggitt Road, Marshall, MI 49068

enbridge.com

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