Memorandum

To:

Alex Smith, Enbridge Energy

From:

Rvan Erickson

Subject: 2014 Tank 11 Environmental Response

Date:

August 4, 2014

Project: 49161092.03 003 009

C:

Karl Beaster

Dear Mr. Smith,

On July 8, 2014, historical hydrocarbon contaminated soil was encountered by Enbridge contractors in a Tank 11 valve maintenance excavation during work at the Enbridge Superior Terminal in Superior, Wisconsin (Figures 1 and 2). The contaminated soil was in a similar location and had similar characteristics to the contaminated soil that was excavated during the 2013 Tank 11 Ring Road project (Figure 3). Enbridge requested that Barr assess the environmental current site conditions and assist with waste disposal coordination.

Barr was onsite on July 8, 2014 to document the environmental conditions observed in the excavation. The excavation was located on the north side of Tank 11 and was approximately 8 feet by 6 feet by 1-foot deep (attached field screening log). Barr observed a sheen on the surface of the water that had accumulated within the excavation. No product was observed. Barr field screened a representative soil sample from each sidewall. The collection of bottom samples at this time was not possible due to the presence of standing water in the excavation.

Soil with a headspace detection greater than 10 parts per million (ppm) and a petroleum odor was identified along the southern sidewall (114.6 ppm) and western sidewall (55.7 ppm). Additional remedial excavation activity was not possible due to the presence of tank infrastructure. Soil sample Tank 11 Valve-S-1 was collected from the western sidewall because that location would be more exposed than the southern location after the completion of the valve maintenance work. The sample was submitted to the Legend Technical Services laboratory for analysis of PVOC + Naphthalene. Detected analyte concentrations were below WDNR Industrial Direct Contact RCL's and passed the hazard quotient criteria that are set in the US EPA Regional Screening Level Web Calculator. The only analyte that exceeded the WDNR Groundwater RCL's was Naphthalene (4.1 mg/kg). The laboratory report is attached to this memo.

Approximately 3 cubic yards of contaminated soil and water were removed from the valve maintenance excavation with a hydrovac truck, solidified for transportation purposes and hauled to the Shamrock Landfill in Cloquet, Minnesota under the existing Tank 11 waste profile (CL13-0023).

To:

Alex Smith, Enbridge Energy

From:

Ryan Erickson

Subject:

2014 Tank 11 Environmental Response

Date:

August 4, 2014

Page:

A concrete base structure was constructed within the excavation around the valve and clean fill was added around the perimeter of the slab as part of the valve maintenance project.

Based on the characteristics and location of the hydrocarbon contaminated soil encountered in the Tank 11 valve maintenance excavation, we believe that it is historical in nature. Since the 2014 contamination is in the same vicinity and has similar characteristics as the contamination discovered in 2013 Tank 11 Ring Road Project (Figure 3), we recommend that this contamination be associated with that site, which is still pending WDNR closure pending the facility-wide negotiated agreement.

Please let me know if you have any additional questions.

Sincerely,

Ryan Erickson

Attachments
Photos 1 and 2
Figures 1 through 3
Site Investigation Field Sampling and Screening Log
Legend Technical Services Laboratory Report

To: Alex Smith, Enbridge Energy

Ryan Erickson 2014 Tank 11 Environmental Response From: Subject:

Date: August 4, 2014

Page:

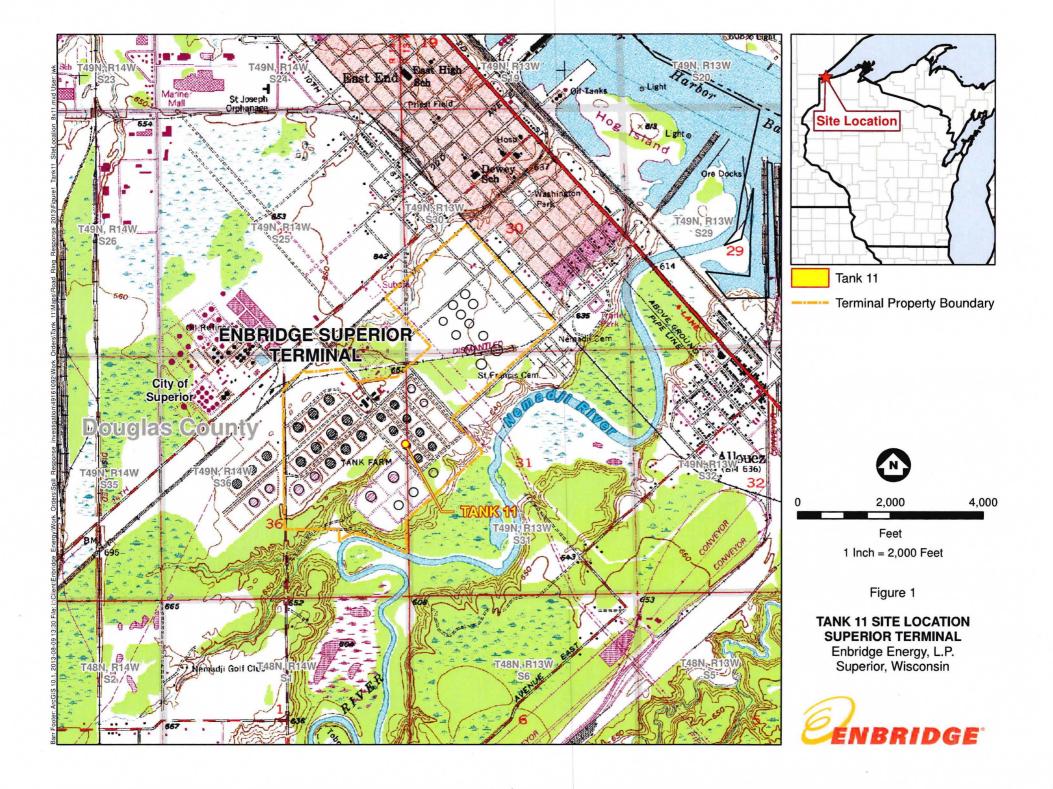
Photos

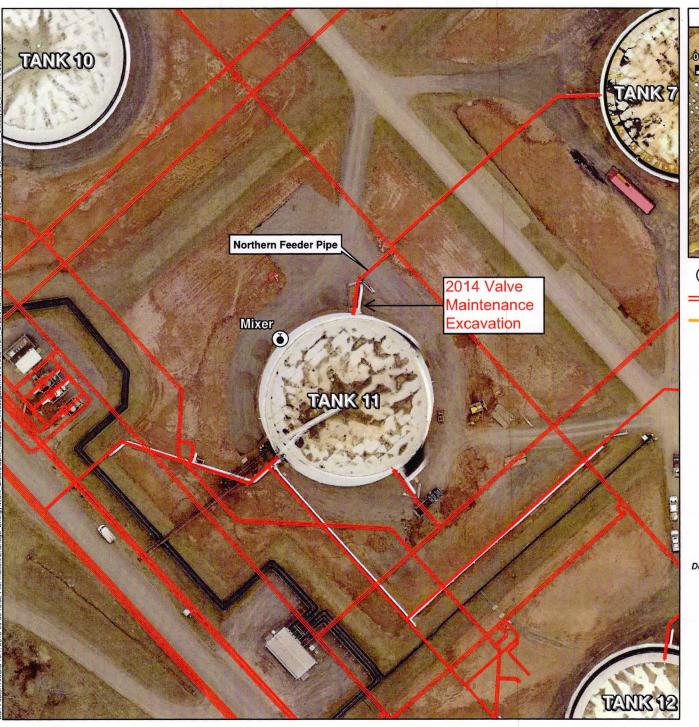


Photo 1: 2014 Tank 11 valve maintenance excavation site. 7/8/2014



Photo 2: Tank 11 valve maintenance excavation with trace amounts of sheen on water surface. 7/8/2014







Mixer

Pipeline Infrastructure

--- Terminal Property Boundary

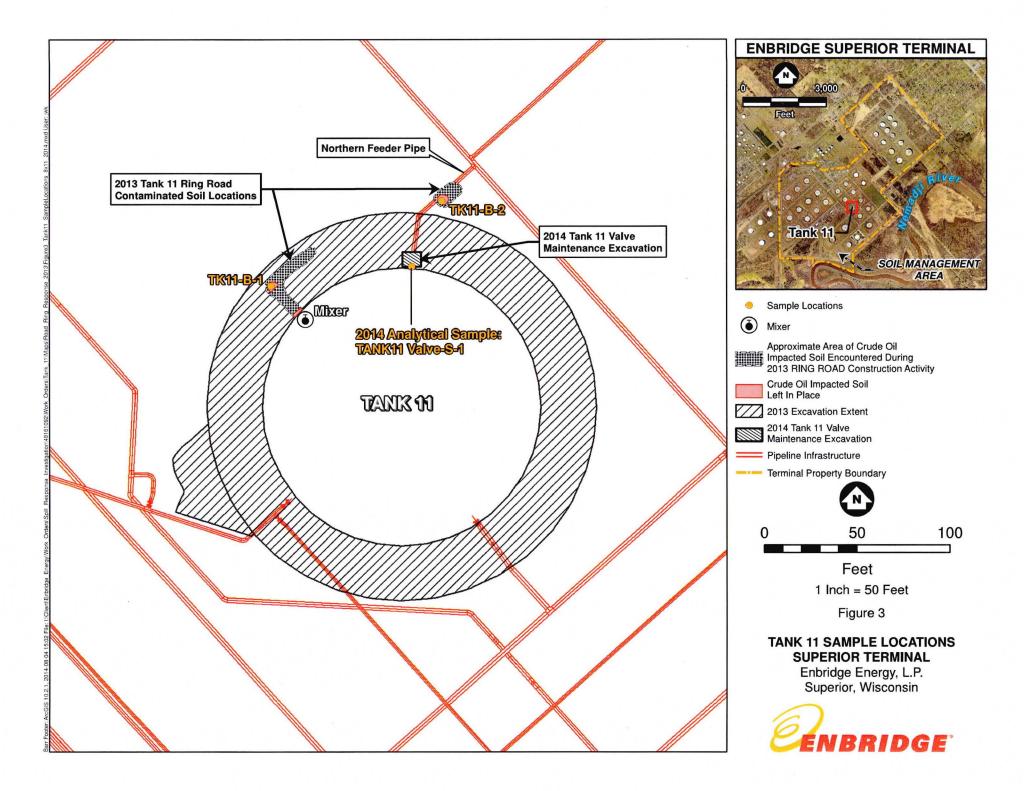


Feet 1 Inch = 80 Feet Douglas County Aerial Photography Circa April/May, 2013 Figure 2

TANK 11 SITE LAYOUT MAP SUPERIOR TERMINAL

Enbridge Energy, L.P. Superior, Wisconsin





SITE INVESTIGATI	ON FIE	LD SAMI	LING A	ND SCREEN	ING LOG											Pag	geof
Location: Milepost					Twak 1	1											
Equipment used: 1	huto -	lonization	detecto	r with 11.7	_eV lamp		Backgro	ound Hea	dspace:	O.O PI	m		Date:	7/	8/14		
Sample Nomenclat										-1		:	Sampler:			8	ARR
Soil Sample Types: R	= Remov	ed Sample	; \$ = Side	wall Sample ;	B = Bottom	Sample ; Sto c	kpile = Sto	ockpile San	npie			Calibrati	on Time:				71/1
			Soil			Headspace		TCH: nort									ns,
Samula ID	Depth	Time	Туре	Color/	Odor/ Sheen	Reading	borings,	wells, stru	uctures, u	tilities, n	atural fe	atures	1 inc	ch/gri	d= 2'	FEET	
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July 16, 2014

Ms. Andrea Nord Barr Engineering Co. 4700 W 77th St Minneapolis, MN 55435

Work Order Number: 1402974 RE: 49161092

Enclosed are the results of analyses for samples received by the laboratory on 07/09/14. If you have any questions concerning this report, please feel free to contact me.

Results are not blank corrected unless noted within the report. Additionally, all QC results meet requirements unless noted.

All samples will be retained by Legend Technical Services, Inc., unless consumed in the analysis, at ambient conditions for 30 days from the date of this report and then discarded unless other arrangements are made.

All samples were received in acceptable condition unless otherwise noted.

WI Accreditation #998022410

Prepared by, LEGEND TECHNICAL SERVICES, INC

Tom Barrett
Vice President, Strategic Analytical Services tbarrett@legend-group.com

Legend Technical Services, Inc.

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirely.

LEGEN D Technical Services, Inc. www.legend-group,com

į	Barr Engineering Co.	Project:	49161092	_		
	4700 W 77th St	Project Number:	49161092.03 003 009	Work Order #:	1402974	
į	Minneapolis, MN 55435	Project Manager:	Ms. Andrea Nord	Date Reported:	07/16/14	

Wi(95) GRO/8015D nd Technical Services, Inc.

Analyte	Result	RL	MDL	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Tank 11 Valve-S-1_1-1 (1402974-01)) Soll Sampl	ed: 07/0	8/14 10:00	Received:	07/09/14	9:10				
1,2,4-Trimethylbenzene	0,40	0.027	0.0029	mg/kg dry	1	B4G0902	07/09/14	07/09/14	WI(95) GRO	
1,3,5-Trimethylbenzene	0.31	0.027	0.0066	mg/kg dry	1		-		-	
Benzene	<0.0031	0.027	0.0031	mg/kg dry	1	-			-	
Ethylbenzens	0.048	0.027	0.0068	mg/kg dry	1	•	•	•	-	B-01
Naphthalene	4.1	0.53	0.023	mg/kg dry	1	-	-	-		
Toluene	820.0	0.027	0.0044	mg/kg dry	1		-		-	
Xylenes (total)	0.23	0.080	0.015	mg/kg dry	1	-	-		•	
Surrogate: 4-Fluorochlorobenzene	112			80-150 %					-	

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Barr Engineering Co.	Project: 49161092	
4700 W 77th St	Project Number: 49161092.03 003 009	Work Order #: 1402974
Minneapolis, MN 55435	Project Manager: Ms. Andrea Nord	Date Reported: 07/16/14

ANALYTICAL	DEDODT FOR	DEAMDIES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Tank 11 Valve-S-1_1-1	1402974-01	Soil	07/08/14 10:00	07/09/14 09:10

Shipping Container Information

Temperature (°C): 1.9

Received on ice: Yes Received on melt water: No Custody seals: No Temperature blank was present Ambient: No

Received on ice pack: No Acceptable (IH/ISO only): No

Default Cooler

The dry weight correction and dilution applies to the sample result, MDL, and RL.

Ethylbenzene was present in the method blank between the MDL and RL for the BTEX analysis

Legend Technical Services, Inc.

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Page 2 of 8



Barr Engineering Co.	Project: 49161092									
4700 W 77th St	Project Number: 49181092.03 003 009	Work Order #: 1402974								
Minneapolis, MN 55435	Project Manager: Ms. Andrea Nord	Date Reported: 07/16/14								

PERCENT SOLIDS Legend Technical Services, Inc.

Analyte	Result	RL			Dilution Batch		Prepared Analyzed		Method	Notes
Tank 11 Valve-S-1_1-1 (1402974-01) Soil Sampled: 07/08/14 10:00					07/09/14	9:10				
% Solide 94			%	. 1	84G1513	07/15/14	07/16/14	% calculation		

<u> LEGEND</u>

Technical Services, Inc. -www.legend-group.com

Barr Engineering Co. 4700 W 77th St Minneapolis, MN 65435 Project: 49161092
Project Number: 49161092.03 003 009
Project Manager: Ms. Andrea Nord Work Order #: 1402974 Date Reported: 07/16/14

Wi(95) GRO/8015D - Quality Control Legend Technical Services, Inc.

Analyte	Result	RL	MDL	Units	Spike Level	Source Result	%REC	%REC Limits	%RPD	%RPD Limit	Notes
Batch B4G0902 - EPA 5035 Soil	Purge and Trap)									
Blank (B4G0902-BLK1)					Prepared	& Analyze	d: 07/09/1	14			
1,2,4-Trimelhylbenzene	< 0.0027	0.026	0.0027	mg/kg wet							
1,3,5-Trimethylbenzene	< 0.0062	0.025		mg/kg wet							
Benzene	< 0.0029	0.025	0.0029	mg/kg wet							
Ethylpenzene	0.00909	0.025	0.0084	mg/kg wet							B-02, J
Naphthalene	< 0.022	0.50	0.022	mg/kg wet							
Toluene	< 0.0041	0.025	0.0041	mg/kg wet							
Xylenes (total)	< 0.014	0.075	0.014	mg/kg wet							
Surrogate: 4-Fluorochlorobenzene	23.2			ugs	26.0		92.9	80-150			
LCS (B4G0902-BS1)					Prepared	& Analyze	d: 07/09/1	4			
1,2.4-Trimethylbenzene	98.3			ug/L	100		98.3	80-120			
1,3,5-Trimethylbenzene	95.9			ug/L	100		95.9	80-120			
Benzene	99.0			ug/L	100		99.0	80-120			
Ethylbenzene	96.1			ug/L	100		96.1	80-120			
Naphthalene	96.4			ug/L	100		96.4	80-120			
Toluene	98.5			ug/L	100		98.5	80+120			
Xylenes (total)	280			ug/L	300		93.5	80-120			
Surrogate: 4-Fixorochlorobenzene	. 23.4			ug/L	25.0		93.5	80-150			
LCS Dup (B4G0902-BSD1)					repared	: 07/09/14	Analyzed	: 07/10/14			
1.2.4-Trimethylbenzene	95.5			ug/L	100		95.5	80-120	2.91	20	
1,3,5-Trimethylbenzene	92.6			ug/L	100		92.6	80-120	3.48	20	
Benzene	98.8			ug/L	100		98.8	80-120	0.254	20	
Ethylbenzene	95.9			ug/L	100		95.9	80-120	0.190	20	
Naphthalene	96.8			ug/L	100		96.8	80-120	0.429	20	
Toluene	98.6			ug/L	100		98.6	80-120	0.113	20	
Kylenes (total)	280			ug/L	300		93.3	80-120	0.198	20	
Surrogate: 4-Fluorochlorobenzene	23.4			USIL	25.0		93.5	80-150			
Matrix Spike (B4G0902-MS1)	s	ource: 1	402957-	03 F	repared	07/09/14	Analyzed	: 07/10/14			
1,2.4-Trimelhyibenzene	94.0			ug/L	100	<	94.0	80-120			
1,3,5-Trimelhyibenzene	91.2			ug/L	100	<	91.2	80-120			
Benzene	98.0			ug/L	100	<	98.0	80-120			
Ethylbenzene	96.9			ug/L	100	0.286	96.6	80-120			
Naphthalene	90.2			ug/L	100	*	90.2	80-120			
Yoluene	98.2			ug/L	100	<	98.2	80-120			
Kylenes (total)	. 285			ug/L	300	0.146	94.9	80-120			
Surrogate: 4-Fluorochlorobenzane	23.2			uar.	25.0		92.6	80-150			

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Technical Services, Inc.

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88 Empire Drive St Paul, MN 55103 Tel: 651-642-1150 Fax: 651-642-1239

Barr Engineering Co.	Project:	49161092	······································	
4700 W 77th St	Project Number:	49161092.03 003 009	Work Order #:	1402974
Minneapolis, MN 55435	Project Manager:	Ms. Andrea Nord	Date Reported:	07/16/14

Notes and Definitions

J	Parameter was present between the MDL and RL and should be considered an estimated value
	T

Target enayle was present in the method blank, between the MDL and RL.
Analyte was present in the method blank. Sample result is less than or equal to 10 times the blank cor
Less than value listed
Sample results reported on a dry weight basis
Not applicable. The KiPPD is not calculated from values less than the reporting limit.
Mathod Detection Limit
Realitive Percent Dilherence
Laboratory Control Spiña = Blank Spike (BS) = Laboratory Fortified Blank (LFB)
Metrix Spike = Laboratory Fortified Metrex (LFM)

dry
NA
MDL
RL
RPD
LCS

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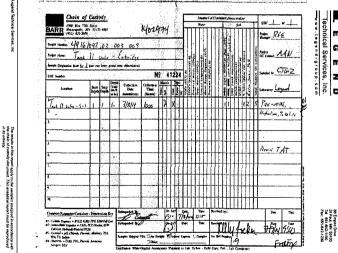
Project: 49161092 Project Number: 49161092.03 003 009 Project Manager: Ms. Arvina Barr Engineering Co. 4700 W 77th St Minneapolis, MN 55435 Work Order #: 1402974 Date Reported: 07/16/14

PERCENT SOLIDS - Quality Control Legend Technical Services, Inc.

Result	RL	MDL	Units	Spike Level	Source Result	%REC	%REC Limits	%RPD	%RPD Limit	Notes
s	ource: 1	403068-0	2	Prepared.	07/15/14	Analyzed	07/16/14			
94.0			%		94.0			0.00	20	
	s	Source: 1	Source: 1403068-0	Source: 1403068-02	Result RL MDL Units Level Source: 1403068-02 Prepared.	Result RL MDL Units Level Result	Result RL MDL Units Level Result %REC	Result RL MDL Units Level Result %REC Limits Source: 1403088-02 Prepared: 07/15/14 Analyzed: 07/16/14	Result RL MDL Units Level Result %REC Limits %RPD Source: 1403068-02 Prepared: 07/15/14 Analyzed: 07/16/14 Analyzed: 07/16/14 Analyzed: 07/16/14	Result RL MDL Units Level Result %REC Limits %RPD Limit Source: 1403088-02 Prepared: 07/15/14 Analyzed: 07/16/14 Analyzed: 07/16/14 Virginia Virginia

Legend Technical Services, Inc.

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12-16-561125

Enbridge Pipelines (Lakehead) L.L.C. **Environment Department** 1320 Grand Avenue Superior, WI 54880 Tel 715 394 1400 Fax 715 394 1500

Shane Vokom Joseph Peterson Chervl Urie Jim Snider Rhonda O'Leary James Anklam Karl Beaster Stacey Frerich Derek Senn Kelli Nelson **Bryan Sederberg** Alex Smith Greg St. Onge Julie O'Brien

Manager, Environment Operations Supervisor, Region Operations Supervisor, Programs **Environmental Specialist** Sr. Air Compliance Specialist Sr. Environmental Analyst Environmental Analyst II **Environmental Analyst** ER Preparedness Coordinator **Environmental Assistant**

- In faulty wroc ERP - No RP letter sent

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#3 X:362,769

y:692,364

www.enbridgepartners.com

January 22, 2014

Erin Endsley Wisconsin Department of Natural Resources - Northern Region Remediation and Redevelopment 1701 N 4th St Superior, WI 54880

Re:

Tank 11 Historical Crude Oil Impacts

Ring Road Excavation Report

Enbridge Energy Superior Terminal

Superior, Wisconsin

Dear Ms. Endsley:

Please find attached report regarding the clean-up of historical crude oil impacts discovered during the Tank 11 ring road excavation. Based on the findings presented in this report, we are requesting no further action in regards to this historical release.

Please contact me if you have any questions or comments regarding this project.

Sincerely,

Enbridge Energy

Karl F. Beaster, P.G. **Environmental Analyst**

Enclosure

Ryan Erickson, Barr Engineering

Tank 11 10/2/13

State of Wisconsin Department of Natural Resources dnr.wi.gov

Notification For Hazardous Substance Discharge (Non-Emergency Only)

Form 4400-225 (05/12)

Page 1 of 2

(continued)

Emergency Discharges / Spills should be reported via the 24-Hour Hotline: 1-800-943-0003

Notice: Hazardous substance discharges must be reported immediately according to s. 292.11 Wis. Stats. Non-emergency hazardous substance discharges may be reported by telefaxing or e-mailing a completed report to the Department, or calling or visiting a Department office in person. If you choose to notify the Department by telefax or by email, you should use this form to be sure that all necessary information is included. However, use of this form is not mandatory. Under s. 292.99, Wis. Stats., the penalty for violating the reporting requirements of ch. 292 Wis. Stats., shall be no less than \$10 nor more than \$5000 for each violation. Each day of continued violation is a separate offense. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than program administration. However, information submitted on this form may also be made available to requesters under Wisconsin's Open Records Law (ss. 19.31 – 19.39, Wis. Stats.).

Confirmatory laboratory data should be included with this form, to assist the DNR in processing this Hazardous Substance Release Notification. Complete this form. TYPE or PRINT LEGIBLY. NOTIFY appropriate DNR region (see next page) IMMEDIATELY upon discovery of a potential release from (check one): Underground Petroleum Storage Tank System (additional information may be required for Item 6 below) Aboveground Petroleum Storage Tank System ☐ Dry Cleaner Facility Other - Describe: Historical crude oil impacts discovered near an above ground petroleum storage tank during tank ring road construction. R & R Program Associate 10/02/2013 Date DNR Notified: 1. Discharge Reported By Phone No. (include area code) Name (715) 398-4754 Karl Beaster Enbridge Energy Mailing Address **Email Address** 1320 Grand Ave., Superior, WI 54880 karl.beaster@enbridge.com 2. Site Information Name of site at which discharge occurred. Include local name of site/business, not responsible party name, unless a residence/vacant property. Enbridge Superior Terminal - Tank 11 Location: Include street address, not PO Box. If no street address, describe as precisely as possible, i.e., 1/4 mile NW of CTHs 60 & 123 on E side of CTH 60. 2800 East 21st Street, Superior, WI 54880 Municipality: (City, Village, Township) Specify municipality in which the site is located, not mailing address/city. Superior County: Legal Description: 36 Tn 49N Range 14 CE @W Douglas SE 1/4 NE 1/4 Sec 3. Responsible Party (RP) and/or RP Representative Responsible Party Name: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary. **Enbridge Energy** Reported in compliance with s. 292.11(2), Wis. Stats., by a local government exempt from liability under s. 292.11(9)(e), Wis. Stats. For more information see http://dnr.wi.gov/org/aw/rr/lgu/liability.htm. Contact Person Phone Number **Email Address** Name (if different) Karl Beaster (715) 398-4757 karl.beaster@enbridge.com Mailing Address City State ZIP Code 1320 Grand Ave., Superior, WI 54880 54880 Superior Property owner if Different From RP: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary. Contact Person Phone Number **Email Address** Name (if different) Mailing Address City State ZIP Code

State of Wisconsin Department of Natural Resources dnr.wi.gov

Notification For Hazardous Substance Discharge (Non-Emergency Only) Form 4400-225 (05/12) Page 2 of 2

4. Hazardous Substance	Information								
Identify hazardous substan	ce discharged (che	eck all that apply):							
		Diesel		PERC (Dry Cleaners)					
PAH's		Fuel Oil		RCRA Hazardous Waste					
		Gasoline		Leachate					
Metals (specify):		Hydraulic Oil							
Arsenic		Jet Fuel		☐ Fertilizer					
☐ Chromium		Mineral Oil		Pesticide/Herbicide/Insecticide(s)					
Cyanide		☐ Waste Oil		Other (energia): G. 1. 11					
Lead		_							
PCB's		Petroleum-Unkno	own Type						
5. Impacts to the Environ	ment Information								
Enter "K" for known/confirm	ned or "P" for poter								
Air Contamination			Sewer Contami						
Co-Contamination (Pet	roleum &		ation in Right o	_					
Non-Petroleum)			sion Threat	Surface Water Contamination					
Contamination Within 1		1.0 (3.00) (3.00)		Within 100 ft of Private W					
Contaminated Private \			ater Contamina	tion Within 1000 ft of Public W	/ell				
Contaminated Public V	Vell		ontamination						
Contamination in Fract	ured Bedrock	Other (spe	ecify):						
Tank closure assessm	ent Site	e assessment	Other Date	- Describe: Excavation of soils around tank for c	onstruction				
Lab results:	esults will be faxed	upon receipt] Lab results a	re attached					
	all contracts and a second		ons taken to ha	It the release and contain or cleanup					
hazardous substances that	have been dischar	ged.							
Impacts were from historica	al releases								
6. Federal Energy Act Re	quirements (Sect	ion 9002(d) of the Sc	lid Waste Dis	posal Act (SWDA))					
For all confirmed releases		Source		Cause					
from UST's occurring after	☐ Tank			☐ Spill					
9/30/2007 please provide	Piping			Overfill					
the following information:	Dispenser			Corrosion					
	Submersible Turbine Pump			Physical or Mechanical Damage					
	Delivery Pro	blem		Installation Problem					
Does not apply.	Other (specif	fy):		Other (does not fit any of above)					
				Unknown					
Contact information to re	port non-emerge	ency releases in DN	R's five regio	ns are as follows:					
		(-	-	: DNRRRNER@wisconsin.gov					
Brown, Calumet, Door, Fo	ond du Lac (excep	t City of Waupun - s	ee South Cen	tral Region), Green Lake, Kewaunee, Manitow Waupaca, Waushara, Winnebago counties	oc,				
				DNRRRNOR@wisconsin.gov					
	l, Burnett, Douglas			incoln, Oneida, Polk, Price, Rusk,					
		; Attention R&R P	rogram Assoc	ciate: DNRRRSCR@wisconsin.gov					
	Fond du Lac (City			wa, Jefferson, Lafayette, Richland,					
		tention R&R Prog	ram Associate	: DNRRRSER@wisconsin.gov					
Kenosha, Milwaukee, Oza	aukee, Racine, Wa	shington. Waukesha	counties						

West Central Region (FAX: 715-839-6076); Attention -- R&R Program Associate: DNRRRWCR@wisconsin.gov Adams, Buffalo, Chippewa, Clark, Crawford, Dunn, Eau Claire, Jackson, Juneau, LaCrosse, Marathon, Monroe, Pepin, Pierce, Portage, St. Croix, Trempealeau, Vernon, Wood counties

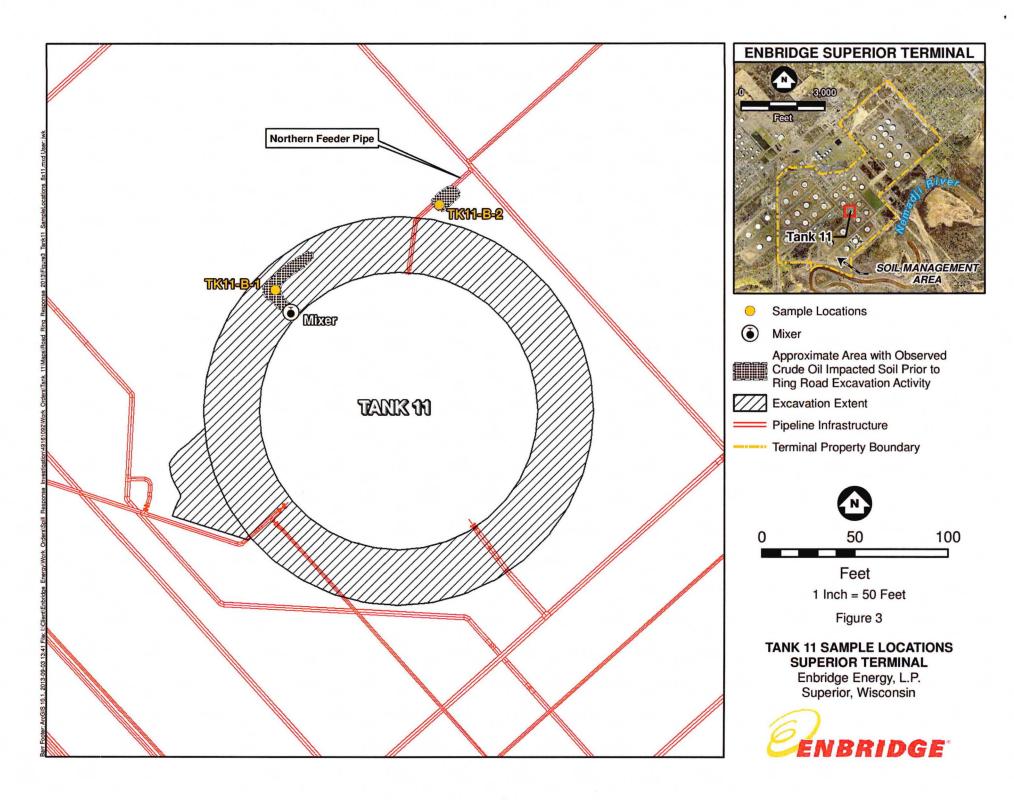


Table 1

Soli Analytical Data Summary Tank 11 Ring Road Excavation Enbridge Energy Terminal - Superior, Wisconsin Units, mg/kg (unless otherwise noted)

	Parameter		Moisture	1,2,4-Trimethyl	1,3,5-Trimethyl	Benzene	Ethyl	Toluene	Xylene, total	Diesel Range	Exceedance	Hazard	Cumulative	Pass or Fall
	Effective Date	Exceedance Key	Moisture	benzene	benzene	Delizero	benzene	Toluene	Aylene, total	Organics	Count	Quotient	Cancer Risk	Pass of Pas
Industrial Groundwater SSRCLs		Bold		1.3793 TR	1.3793 TR	0.0051	0.785	0.5536	1.97 XYL					1
Industrial Direct Contact SSRCLs	05/01/2012	No Exceed		219	182	7.41	37	818	258		0	1.0	0.00001	Pass
Location	Date	Depth (ft)												
TK 11 ROAD-B-1	5/07/2013	3	10.9 %	29.4	9.68	1.64	31.1	< 0.286	7.71	17400	0	0.0847	1.1E-06	Pass
TK 11 ROAD-B-2	5/08/2013	0.8	19.9 %	0.85 *	0.50 °	< 0.060 °	0.50 °	< 0.060 *	0.72	2380	0	0.0026	2.2E-08	Pass

TR - Based on 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene combined.

XYL - Based on Xylenes (m-, o-, p- combined).

*Estimated value, QA/QC criteria not met.