



April 14, 2023

Mr. Karl Beaster
Enbridge Energy LP, LLC
11 East Superior Street, Suite 125
Duluth, MN 55802
(sent via email only to: karl.beaster@enbridge.com)

Subject: PFAS Site Investigation Work Plan – Supplement #1
Enbridge Energy Superior Terminal
2800 East 21st Street, Superior, WI
BRRTS ID#: 02-16-589282

Dear Mr. Beaster,

The Wisconsin Department of Natural Resources (DNR) has completed a review of the PFAS Site Investigation Work Plan – Supplement #1 (SIWP), prepared by AECOM and dated March 20, 2023 (SIWP). The SIWP documents the proposed additional soil sampling and surface water sampling for the investigation of per-and polyfluoroalkyl substances (PFAS) contamination associated with the use of aqueous film forming foam (AFFF) for firefighting and training at the Enbridge Superior Terminal, 2800 East 21st Street, Superior, WI (Site). The DNR received a \$700.00 fee for the review as specified in Wisconsin Administrative (Wis. Admin.) Code ch. NR749.

The DNR has the following comments on the proposed work:

- The SIWP proposes the collection and analysis of soil samples from 0.5 through 4 feet below grade from 4 locations where PFAS concentrations were the highest during the previous site investigation activities. If the depths of the proposed sampling are not adequate to define the vertical extent of contamination, the DNR may request additional sampling for compliance with Wis. Admin. Code ch. NR716. Also, based on the results of the proposed sampling the DNR may request additional soil sampling at depth at other tank locations where PFAS compounds were detected.
- The SIWP did not contain plans for groundwater monitoring for PFAS. Future iterations of site investigation will need to include groundwater monitoring for PFAS as stated in the DNR's January 20, 2023 letter regarding the initial phase of PFAS soil sampling.

The DNR approves the SIWP as an additional phase of investigation of the site. Based on the results of this investigation, additional investigation may be required to fulfill the requirements of Wis. Admin. Code ch. NR716.

The DNR appreciates the work Enbridge is conducting to investigate potential PFAS contamination from the use of AFFF at the Superior Terminal. Please contact me at John.Sager@wisconsin.gov or (715) 919-7239 if you have any questions or if you would like to discuss the proposed work.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Sager". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Sager".

John Sager
Hydrogeologist
Remediation and Redevelopment Program

C: Nick Larabel, Enbridge

Leo Linnemanstons, AECOM