



February 14, 2024

Karl Beaster  
Enbridge Energy LP, LLC  
11 East Superior Street, Suite 125  
Duluth, MN 55802

(sent via email only to [karl.beaster@enbridge.com](mailto:karl.beaster@enbridge.com))

SUBJECT: Enbridge Energy Superior Terminal  
2800 East 21<sup>st</sup> Street  
Superior, WI 54880  
BRRTS ID: 02-16-589282

Dear Mr. Beaster,

The Wisconsin Department of Natural Resources (DNR) has completed a review of the *Supplemental Investigation Report #1 – Soil and Surface Water (SIR)*, prepared by AECOM and submitted to the DNR on November 20, 2023. The SIR was prepared for the Enbridge Energy Superior Terminal site located at 2800 East 21<sup>st</sup> Street, Superior, Wisconsin (Site). On December 11, 2023, the DNR received the appropriate technical assistance fee per Wisconsin Administrative (Wis Admin.) Code ch. NR 749 for review of the SIR.

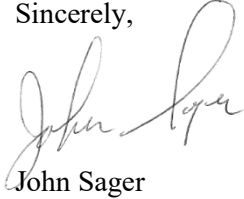
The SIR documents the collection of 20 soil samples from four soil borings installed in the secondary containment of four above-ground storage tanks (ASTs) and two surface water samples collected from each of two stormwater outfalls. The locations selected had the highest concentration of per- and polyfluoroalkyl substances (PFAS) compounds detected during the initial site investigation conducted in 2023.

The DNR approves the SIR and has the following comments that can be addressed during future site investigation work at this Site:

- The findings of the SIR appear to show PFAS concentrations generally decreasing with depth. However, the DNR cannot concur at this time that additional vertical soil sampling is not necessary until a groundwater investigation for PFAS is conducted. The DNR suggests the existing monitoring well network could be used to monitor groundwater for PFAS.
- Wis. Admin. Code ch. NR 716 requires the definition of the degree and extent of contamination in all affected media. While the first two iterations of site investigation have indicated the source of the PFAS contamination is the secondary containments of ASTs, it has not yet been proposed how the lateral extent of contamination will be defined. Since this is a relatively unique situation involving discrete, bermed and ditched drainage areas, the DNR recommends discussing options for meeting the requirements of Wis. Admin. Code ch. NR 716.
- The DNR agrees with AECOM's recommendation that further surface water investigation is necessary, as well as investigation along conveyance paths, as suggested in the SIR. The DNR recommends expanding the surface water investigation to include surface water sampling of the Nemadji River.

The DNR appreciates the work Enbridge is conducting to complete a PFAS investigation at the Enbridge Energy Superior Terminal. Please contact me at [John.Sager@Wisconsin.gov](mailto:John.Sager@Wisconsin.gov) or (715) 919-7239 if you have any questions.

Sincerely,

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

John Sager  
Hydrogeologist  
Remediation and Redevelopment Program

cc: Leo Linnemanstons, AECOM (via email)