

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 10/21)

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Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name Beaster	First Karl	MI MI	Organization/ Business Name Enbridge Energy LP, LLC
Mailing Address 11 East Superior Street, Suite 125			City Duluth
			State MN
			ZIP Code 55802
Phone # (include area code) (715) 718-1040	Fax # (include area code)	Email karl.beaster@enbridge.com	

The requester listed above: (select all that apply)

- Is currently the owner
 Is considering selling the Property
 Is renting or leasing the Property
 Is considering acquiring the Property
 Is a lender with a mortgagee interest in the Property
 Other. Explain the status of the Property with respect to the applicant:

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name	First	MI	Organization/ Business Name
Mailing Address			City
			State
			ZIP Code
Phone # (include area code)	Fax # (include area code)	Email	

Environmental Consultant (if applicable)

Contact Last Name Linnemanstons	First Leo	MI	Organization/ Business Name AECOM
Mailing Address 1650 Deming Way, Suite 100			City Middleton
			State WI
			ZIP Code 53562
Phone # (include area code) (608) 828-8208	Fax # (include area code)	Email leo.linnemanstons@aecom.com	

Section 2. Property Information

Property Name Enbridge Energy Superior Terminal			FID No. (if known) 816010580
BRRTS No. (if known) 02-16-589282		Parcel Identification Number	
Street Address 2800 East 21st Street			City Superior
			State WI
			ZIP Code 54880
County Douglas	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Superior	Property is composed of: <input type="radio"/> Single tax parcel <input checked="" type="radio"/> Multiple tax parcels	Property Size Acres 560

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1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

- No Yes

Date requested by: _____

Reason:

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

- No. **Include the fee that is required for your request in Section 3, 4 or 5.**
 Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - Include a fee of \$350. Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
- Include a fee of \$300 for sites with residual soil contamination; and
- Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. [Numbers in brackets are for DNR Use]

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"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2.,h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

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- Lease liability clarification - s. 292.55, Wis. Stats. [646]
- ❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**
 - (1) a copy of the proposed lease;
 - (2) the name of the current owner of the Property and the person who will lease the Property;
 - (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
 - (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
 - (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
 - (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

- ❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

No Action Required (NAR) - NR 716.05, [682]

- ❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

- ❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/Igu.html#tabx4.

Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

- ❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]

- ❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

- ❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

Section 6. Other Information Submitted

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Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

- Phase I Environmental Site Assessment Report - Date: _____
- Phase II Environmental Site Assessment Report - Date: _____
- Legal Description of Property (required for all liability requests and specialized agreements)
- Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

- Groundwater
- Soil
- Sediment
- Other medium - Describe: _____

Date of Collection: _____

- A copy of the closure letter and submittal materials
- Draft tax cancellation agreement
- Draft agreement for assignment of tax foreclosure judgment
- Other report(s) or information - Describe: _____

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

- Yes - Date (if known): _____
- No

Note: The Notification for Hazardous Substance Discharge Form - Non-Emergency Only (Form 4400-225) is accessible through the RR Program Submittal Portal application. Directions for using the form and the Submittal Portal application are available on the [Submittal Portal web page](#).

Section 7. Certification by the Person who completed this form

- I am the person submitting this request (requester)
- I prepared this request for: Karl Beaster
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.



Signature

Senior Project Hydrogeologist

Title

April 12, 2024

Date Signed

(608) 828-8208

Telephone Number (include area code)

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Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

DNR NORTHERN REGION

Attn: RR Program Assistant
Department of Natural Resources
223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION

Attn: RR Program Assistant
Department of Natural Resources
2984 Shawano Avenue
Green Bay WI 54313

DNR SOUTH CENTRAL REGION

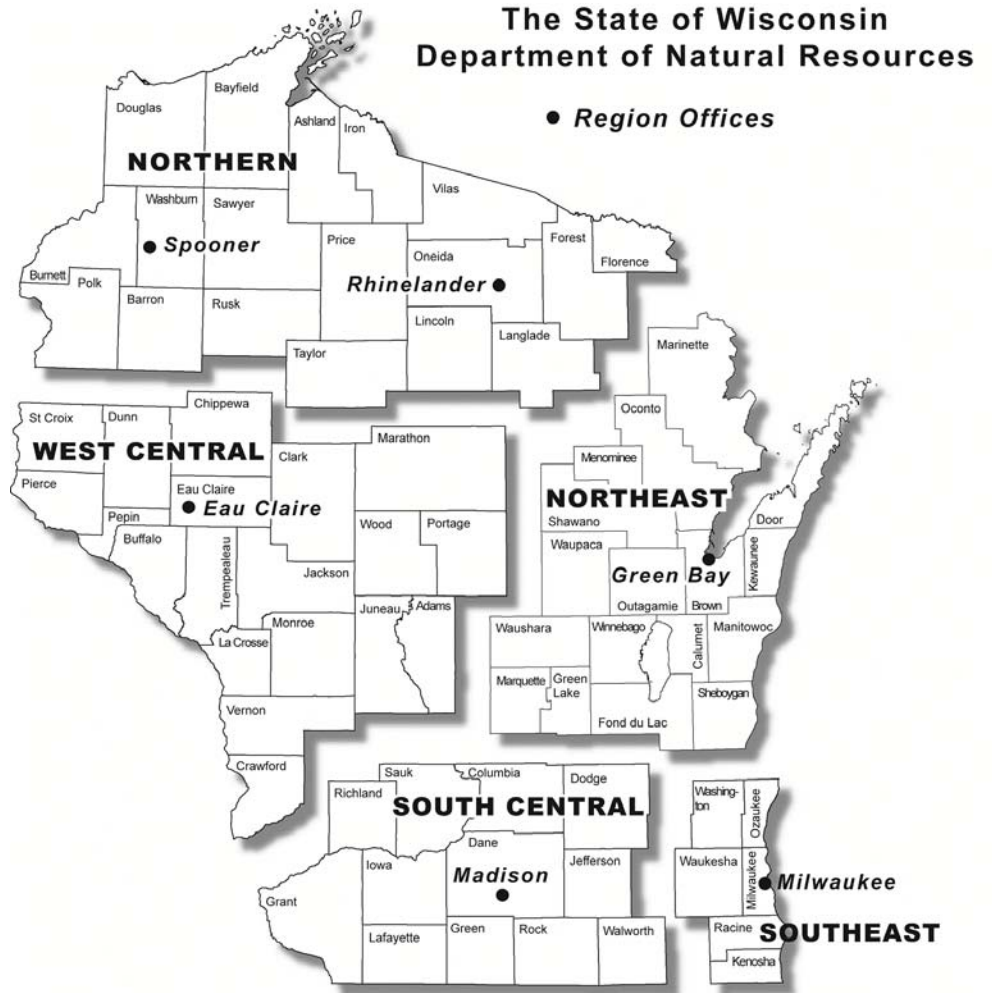
Attn: RR Program Assistant
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg WI 53711

DNR SOUTHEAST REGION

Attn: RR Program Assistant
Milwaukee DNR Office
1027 West St. Paul Ave
Milwaukee WI 53233

DNR WEST CENTRAL REGION

Attn: RR Program Assistant
Department of Natural Resources
1300 Clairemont Ave.
Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		



AECOM
1350 Deming Way
Suite 100
Middleton, WI 53562

T: +1-608-836-9800
aecom.com

Mr. John Sager
Wisconsin Department of Natural Resources
1701 North 4th Street
Superior, Wisconsin 54880

April 12, 2024

PFAS Site Investigation Work Plan – Supplement #2
Enbridge Energy Superior Terminal
2800 East 21st Street
Superior, Wisconsin
BRRTS No. 02-16-589282, FID# 816010580
AECOM Project No. 60702913

Dear Mr. Sager:

On the behalf of Enbridge Energy, Limited Partnership (Enbridge), AECOM Technical Services, Inc. (AECOM) is providing the Wisconsin Department of Natural Resources (WDNR) this second work plan supplement to the original site investigation work plan for investigating Per- and Polyfluoroalkyl Substances (PFAS) at the above referenced facility. The original work plan was submitted on April 28, 2022, and approved by the WDNR on June 2, 2022. The original work plan was prepared in response to the WDNR's "Responsible Party (RP)" letter dated February 28, 2022, and in general accordance with Chapter NR 716, Wisconsin Administrative Code (WAC), requirements. The work plan supplements (Supplement #1 and 2) describe the additional scope and methods of the proposed investigation and do not repeat information regarding the background and site characteristics from the original work plan.

The results of the original site investigation were provided in a report submitted to the WDNR on November 4, 2022. Following review of that site investigation report, the WDNR provided comments in a letter dated January 20, 2023, which requested additional investigation. To do so, Enbridge developed a plan to conduct the PFAS site investigation at the Superior Terminal (Terminal) in a phased approach.

The first work plan supplement was submitted on March 20, 2023, and approved by the WDNR on April 14, 2023. The results of the first supplemental site investigation were provided in a report submitted to the WDNR on November 4, 2023. Following review of the supplemental site investigation report, the WDNR provided comments in a letter dated February 14, 2024, which identified additional areas of investigation.

To address these areas, Enbridge proposes this second work plan supplement to continue conducting the PFAS site investigation at the Superior Terminal (Terminal). The objectives of this work plan supplement are the following:

- to assess if onsite surface water impacts may be present by collecting additional water samples from the identified storm water ponds at the Terminal, and
- to develop an understanding of the Terminal's storm water conveyance system that will aid with determining potential source(s) of surface water impacts discovered in storm water ponds (e.g., Ponds #2 and #3) and

with other locations along storm water conveyance paths between the storm ponds and tank containment areas.

Other investigations suggested by the WDNR for sampling additional media and/or offsite locations were contemplated and deferred for this phase. Enbridge believes that the results from this investigation are needed to develop an efficient approach to sampling additional media and to select future onsite and offsite locations. Therefore, Enbridge intends for subsequent phases to provide the information that the WDNR requests in their February 14, 2024 letter for the PFAS investigation at the Terminal.

Involved Parties

Responsible Party

Enbridge Energy, Limited Partnership (Enbridge)
11 East Superior Street, Suite 125
Duluth, Minnesota 55802
Contact: Karl Beaster, PG, Environment Specialist
Karl.beaster@enbridge.com
(715) 718-1040

Environmental Consultant

AECOM Technical Services, Inc. (AECOM)
Leo Linnemanstons, PG, Senior Project Manager
1350 Deming Way, Suite 100
Middleton, Wisconsin 53562
leo.linnemanstons@aecom.com
(608) 828-8208

Proposed Drilling Subcontractor (as needed)

Dakota Technologies, Inc
5001 Boone Avenue North
New Hope, Minnesota 55428
(763) 424-4803

Buried Utilities Clearance Subcontractor

Northwestern Surveying & Engineering
603 Chestnut Street
Cloquet, Minnesota 55720
(218) 444-9394

Laboratory Subcontractor

PACE Analytical Laboratory
1700 Elm Street SE
Minneapolis, Minnesota 55414
(612) 607-1700
WDNR Certification: 999407970

Site Description

The Terminal is located at 2800 East 21st Street, Superior, Wisconsin in Douglas County (see Figure 1) and is approximately 560 acres in size. The Terminal occupies portions of Sections 30 and 31, Township 49N, Range 13W and Section 36, Township 49N and Range 14W. Figure 2 shows site features and the layout of the Terminal.

Previous Site Investigations

The purpose of the previous investigations was to evaluate the potential of PFAS impacts associated with the storage and historic use of aqueous film-forming foam (AFFF) for fire suppression. Enbridge has conducted the following site investigations as part of a phased approach at the Terminal:

- 2022 Surface Soil Investigation: Soil samples were collected from 30 tank containment areas (Tanks 1 to 29) at the Terminal.
- 2023 Vertical Soil Profile and Surface Water Investigation: Vertical soil profiles were conducted at four locations (Tanks 11, 15, 24 and 25) where PFAS concentrations were the highest in the tank containment areas during the 2022 surface soil investigation. Surface water samples were also collected from Ponds #2 and #3 that have outfalls that discharge to the Nemadji River.

Figures 2 and 3 depict the previous soil and surface water sample locations, respectively. Based on these previous site investigations, the following conclusions were made:

- PFAS were detected in soil samples at the Terminal, but concentrations were less than NR 720 generic residual contaminant levels (RCLs).
- The vertical soil profile data at the four locations, where the highest PFAS concentrations were observed in the surface soil of the tank containment areas, strongly indicates that PFAS is quickly retarded from vertical migration in soil. Soil concentrations diminished by 2 and 3 orders of magnitude (10 to 100 times) over the span of 4 feet in depth. Given the low permeability (assumed to be less than $(<)10^{-7}$ centimeter/second) of the unconsolidated formation (fat clay and hardpan) from the ground surface to a depth of more than 100 feet, contaminant migration through the formation is expected to be limited.
- The surface water data indicates that Ponds #2 and #3 contain stormwater with PFAS detections, including PFOA and PFOS.

Given the detection of PFOS in both storm water ponds, the next phase of investigation by Enbridge consists of a storm water system assessment that investigates surface water flow paths and includes additional surface soil and water sampling to determine contributing source areas and conveyance paths.

WDNR Site Investigation Review

WDNR provided comments in their site investigation approval letter, dated February 14, 2024, which requested the following additional investigation:

- Soil – additional sampling may be required to determine the lateral and vertical extent of PFAS impacts in the tank containment areas.
- Surface Water – to conduct further surface water sampling, as well as investigating impacts along storm water conveyance paths at the Terminal.
- Groundwater – to determine impacts by sampling the existing monitoring well network.

Based on the site investigations already conducted and these WDNR requests, Enbridge determined the following activities to be proposed for the next phase of investigation:

- 1) Site Reconnaissance for Drainage Mapping and Surface Water Sampling Locations – following desktop review of drainages and ponds, conduct field mapping of storm water conveyance soil sample and surface water pond sample locations.
- 2) Surface Soil Sampling of Drainages Upstream of Storm Ponds – collect soil samples along stormwater conveyances to assist in determining potential source(s) for surface water impacts in ponds.
- 3) Surface Water Sampling - Onsite Storm Ponds: collect surface water samples from named ponds on the Terminal (eight ponds total).

As stated above, offsite surface water sampling and a groundwater investigation will be deferred until a future phase of investigation to allow for the results from the proposed current phase to be used to guide those activities.

The following sections describe the scope of work intended by Enbridge for performance in 2024 to continue the PFAS site investigation.

Field Investigation

Based on existing site information, stormwater is directed through onsite drainages to the Terminal's pond systems. Figure 3 shows the surface water flow directions and locations for the ponds and the permitted outfalls. To evaluate the presence of PFAS impacts in soil and surface water at the Terminal, this phase of the site investigation includes the following components:

- **Site Reconnaissance:** Drainage mapping is to be completed by observing the following: storm pond locations (inlets and discharges), drainage culverts under roadways (inlets and outlets), and surface water divides (storm water drainage ways). This mapping will also identify the following surface water sampling locations: Ponds #1, 2, 3, 4, 5, 9, North Fire Pond, and South Fire Pond.

As identified in the original workplan, the Terminal includes additional ASTs (identified as Tanks 30 to 45) located in a separate area to the east of Grand Avenue that do not have a history of fire training where AFFF would have been discharged. Therefore, this isolated AST area and the associated storm water system (Ponds #11, 12, 13, 14, and 15) are not included as part of this investigation.

- **Surface Soil Assessment:** Soil samples will be collected from primary drainages from the tank containment areas to the storm water ponds (i.e., those ditches immediately "upstream" of the ponds).
- **Surface Water Sampling:** Surface water samples will be collected from storm water ponds onsite at the Terminal identified during site reconnaissance.

Based on actual site conditions, field sampling methods and sample locations may need to be adjusted, but they are still expected to be consistent with the methods described in this work plan.

Site Reconnaissance

Prior to sample collection activities, a site reconnaissance of the drainage soil sample locations and surface water sample locations will be conducted around the Terminal. During the drainage system reconnaissance, AECOM's project engineer and sampling technician will walk the site to mark out sample locations and map the following:

- Storm Pond Locations (inlets and discharges);
- Drainage Culverts under roadways (inlets and outlets);
- Surface Water Divides (storm water drainage ways).

During the surface water reconnaissance, the following sample locations will also be marked out:

- Ponds #1, 2, 3, 4, 5, 9, North Fire Pond, and South Fire Pond.

Based on site conditions, proposed drainage soil and surface water sample locations will be marked in the field with paint and/or lath. Approximately 20 soil sampling locations will be identified in the storm water drainages and 8 surface water sampling locations at the Terminal. Although no soil or surface water samples are planned offsite at this time, the perimeter of the Terminal will be reviewed from publicly accessible areas to provide information for future sampling, if necessary.

Utility Locating

Public utility locate tickets will be obtained from Digger's Hotline prior to ground disturbance. Because the Terminal is an active crude oil pipeline facility with significant buried infrastructure, Enbridge Ground Disturbance Standards will be followed. This includes conducting 4-way sweeps around borings that extend greater than 12 inches below ground surface. Where necessary, borings will be located away from marked infrastructure in areas that have been swept for subsurface utilities.

A subcontractor may be needed to perform required hydrovacuum excavations to confirm buried utility locations at or in the vicinity of planned soil sample locations. Spoils from hydrovacuum excavations will be managed in the Terminal's soil management area.

Surface Soil Assessment

Soil samples will be collected from the drainages at up to 20 locations within the Superior Terminal based on the results of the site reconnaissance. The sample locations will be selected to assess the impacts in drainages from the tank containment areas to the storm ponds at the Terminal. Soil sampling will focus on the primary conveyances that drain to the storm water ponds (i.e., those ditches immediately "upstream" of the ponds).

Sample locations are planned along the centerline of the drainages. Soil samples will be collected using a decontaminated shovel or hand trowel to clear surface stone or remove a plug of vegetation, if present, to expose underlying fine-grained soils. The shovel will then be used to dig a plug of soil to a depth of approximately 6 inches below ground surface, such that the total depth of excavation is less than 12 inches. Soils will be classified from each boring according to the Unified Soil Classification System (USCS). The presence of red clay and nearby surface water, which may result in ponded water in low spots of the drainages, will be noted. If ponded water is present, the sample location will be offset within the drainage area cleared of buried utilities. A grab soil sample will be collected from the body of the soil plug for laboratory analysis of PFAS. Following collection of the soil sample, the soil plug will be placed back into its hole and the surface restored.

Soil samples for laboratory analysis will be placed in appropriate laboratory-supplied containers, labeled, and maintained on ice in insulated coolers.

Surface Water Sampling

Surface water samples are planned to be collected from the following locations:

- Storm Pond Sample Locations (Ponds #1, 2, 3, 4, 5, 9, North Fire Pond, and South Fire Pond);

Samples will be collected from upstream of the pond outfall at the bank locations identified and marked during the site reconnaissance. Samples will be collected from mid-water column (1.5 to 2 feet below the surface) approximately 5 feet from the shoreline using a peristaltic pump. The sampling train will consist of dedicated silicone and high-density polyethylene tubing. To avoid disturbing sediments by entering the pond, the sample tubing will be fixed to a decontaminated PVC rod, extended out from shore, and suspended below the pond surface at the mid-column water depth. Once the tubing is positioned, water will be pumped and allowed to discharge from the tubing, and then the laboratory-supplied sample container will be filled directly via the tubing.

Water samples for laboratory analysis will be collected in appropriate laboratory-supplied containers, labeled, and maintained on ice in insulated coolers. Surface water samples will be centrifuged at the laboratory to consolidate suspended solids in the water sample container, if necessary.

Water samples for laboratory analysis will be collected in appropriate laboratory-supplied containers, labeled, and maintained on ice in insulated coolers.

Laboratory Analyses

Samples will be shipped overnight in the cooler, on ice, under chain-of-custody protocol to the WDNR PFAS certified laboratory for analyses. Samples will be analyzed for the Wisconsin list of 33 PFAS using EPA modified Method 537.1 isotope dilution. The samples will be analyzed on a standard (30-day) turn-around-time (TAT).

Quality Assurance

Standard sampling protocols for PFAS compounds include the use of field and equipment blanks due to the possible ubiquitous nature of these compounds including the potential presence of these compounds in sampling equipment and supplies, and to assess the possibility of cross-contamination during sampling, transport, and sample storage. Due to the use of the isotope dilution method, Matrix Spike/Spike Duplicate (MS/MSD) analysis will not be requested. As such, the following Quality Assurance samples will be collected for this project:

- **Field Blank:** One field blank will be collected during the sample collection activities. The field blank will be collected by pouring laboratory-certified PFAS-free water into a laboratory-provided sampling container.
- **Equipment Blank:** One equipment blank will be obtained by pouring laboratory certified PFAS free water over the decontaminated sampling equipment and collecting the water in a laboratory provided bottle.
- **Water Blank:** One sample of the water used for decontamination will be collected and tested as a water blank.

These blank samples will be shipped to the laboratory with the field samples. AECOM will provide laboratory data validation review using procedures described in the National Functional Guidelines for High Resolution Superfund Method Data Review (EPA, April 2016), as appropriate.

Equipment Decontamination

Decontamination of the stainless-steel soil sampling equipment will be performed between the collection of each soil sample and will consist of removing solids from the equipment, washing with Alconox, and then triple rinsed with PFAS-free water. Surface water sample collection will use new, dedicated PFAS-free tubing at each sampling location.

Investigation Derived Waste

Excess soil and decontamination water generated during sampling activities will be placed into a labeled 55-gallon drum that will be temporarily staged on-site at the Terminal. A composite waste characterization sample will be collected and analyzed. Once received, the analytical results will aid in proper material disposal. Pending receipt of the waste characterization laboratory results, the contaminated material will be transported off the property and properly disposed offsite at a licensed disposal facility.

Sample Notification and Supplemental Site Investigation Report

The WDNR (via WDNR Form 4400-249) will be notified by Enbridge within ten business days after receiving the sampling results. A data validation review will be completed prior to receipt of the laboratory results by Enbridge.

A supplemental site investigation report will be prepared in general accordance with Chapter NR 716.15 requirements, which includes, project contacts, site and background information, investigation methods, sampling and analysis requirements, field and analysis results, and conclusions and recommendations. Tables summarizing laboratory results and figures that include sample locations will be included. Sampling documentation and laboratory reports will be included in the supporting appendices.

Project Schedule

Scheduling for initial field tasks is anticipated to commence upon receipt of concurrence of the proposed scope of work from the WDNR. A supplemental site investigation report in general conformance to NR 716 will be submitted to the WDNR within 60 days of receipt of the analytical data.

Project Phase	Date
Work Plan Supplement #2, WDNR submittal	April 12, 2024
Site Reconnaissance for Drainages	June 2024
Surface Soil Sampling of Drainages	July 2024
Surface Water Sampling	August 2024
Receipt of Laboratory Analytical Results	August/September 2024
Site Investigation Report	October/November 2024

The timeline is planned to begin field work within 90 days of WDNR's approval of the Work Plan Supplement and was designed to allow for ground conditions that provide a greater likelihood of successful soil sample collection (i.e. not frozen or water saturated soils).

Enbridge will notify the WDNR of significant changes to the site investigation schedule.

Concurrence

Enbridge requests that WDNR provide written comments and concurrence with the scope of work presented in this site investigation work plan. The Work Plan review fee and Technical Assistance Form 4400-237 will be submitted to the WDNR separately.

If you have any questions, please contact Leo Linnemanstons at (608)828-8208.

Sincerely,

AECOM Technical Services, Inc.



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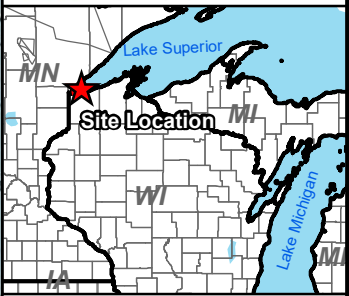
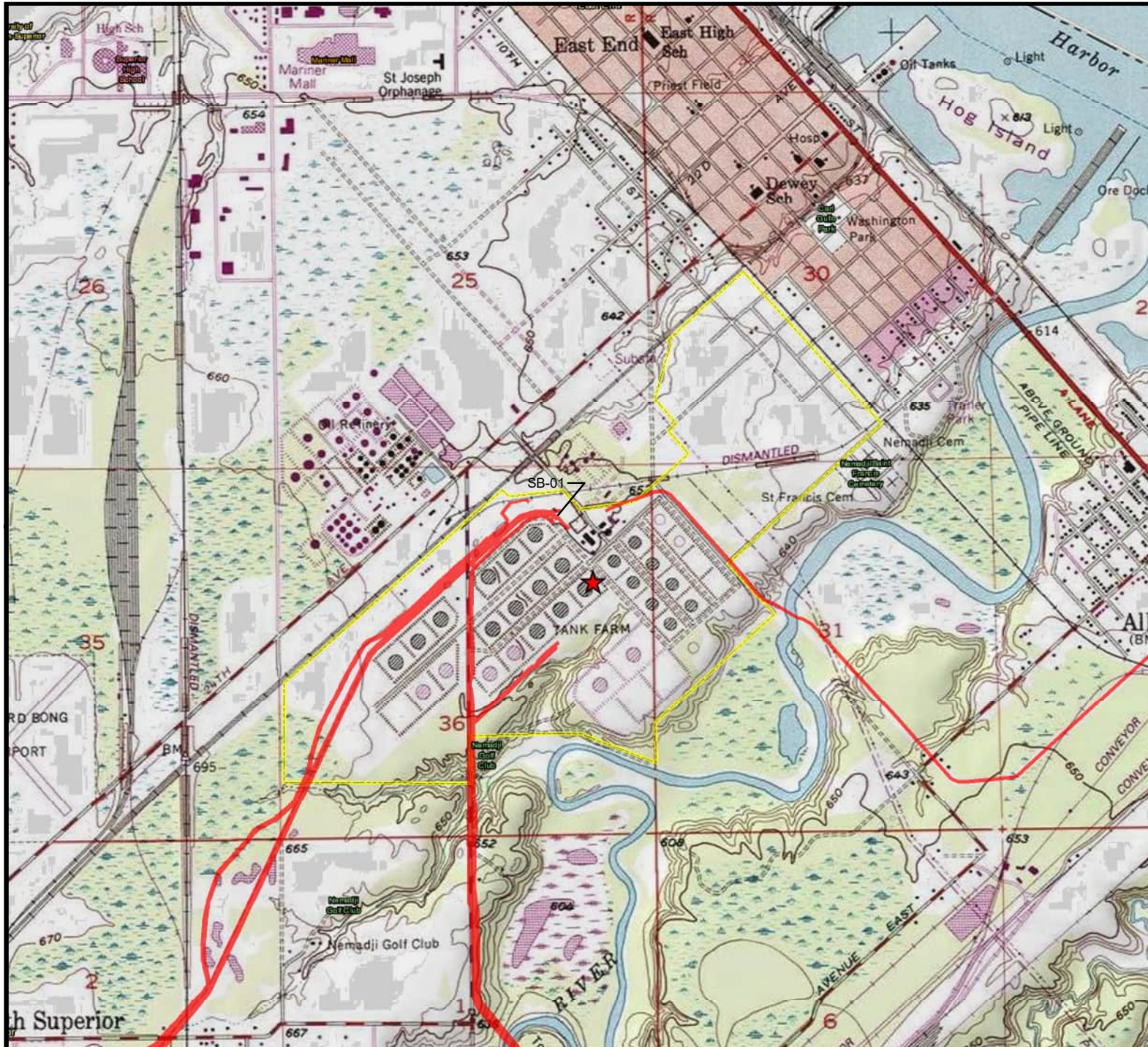
Attachments:

- Figure 1 Site Location Map
- Figure 2 Monitoring Well and Soil Sample Location Map
- Figure 3 Surface Water Sample Locations

Cc: Karl Beaster, Environment Specialist, Enbridge
Bryan Stiemsma, Technical Manager, Enbridge
Nick Larabel, Senior Environmental Advisor, Enbridge

Figures




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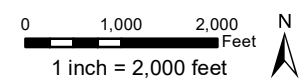


Site Location Map

Enbridge Energy Superior Terminal
2800 East 21st Street
Superior, Wisconsin

Legend

-  Site Location
-  Enbridge Pipelines
-  Terminal Property Boundary



Prepared by:



200 Indiana Avenue
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Drawn:	MO	10/13/2023
Approved:	CS	10/13/2023
Scale:		1:24,000
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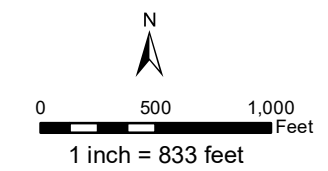


Monitoring Well and Soil Boring Location Map

Enbridge Energy Superior Terminal
2800 East 21st Street
Superior, Wisconsin

- Legend**
- Monitoring Well Location
 - Abandonend Monitoring Well
 - Private Well Location
 - Sample location
 - WPDES Outfalls
 - Containment Berm
 - Surface Flow Direction
 - Storage Tank
 - Enbridge Pipelines
 - Terminal Property Boundary
 - Rivers/Streams
 - Vertical Profile Locations

Notes:
 Units: ng/L - nanograms per liter
 J - Estimated concentration (+/- indicate the direction of bias).
 ND = not detected



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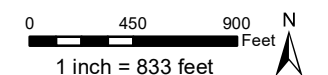
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Approved:	CS	3/5/2024
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Surface Water Features Map
Enbridge Energy Superior Terminal
2800 East 21st Street
Superior, Wisconsin

- Legend**
- WPDES Outfalls
 - Containment Berm
 - Surface Flow Direction
 - Storage Tank
 - Enbridge Pipelines
 - Terminal Property Boundary
 - Rivers/Streams
 - Water Sample Locations



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Approved:	CS	11/2/2023
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Project No:	60702913	
Figure No:	3	