State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1701 North 4th Street
Superior WI 54880

Tony Evers, Governor Adam N. Payne, Secretary

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January 20, 2023

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

(sent via email only to: <u>karl.beaster@enbridge.com</u>)

Subject: Site Investigation Report

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 Surface Soil Investigation Report, prepared by AECOM and dated November 2, 2022 (SIR). The SIR documents the investigation of perand 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 \$1,050 fee for the review as specified in Wisconsin Administrative (Wis. Admin.) Code ch. NR149.

Based on the results of the investigation, PFAS contamination was detected in analytical results from the 29 surficial soil samples collected from the secondary containment of the above ground storage tanks as well as the buildings where AFFF was stored.

Wis. Admin. Code § NR 716.11(3)(a) requires the determination of the nature, degree and extent, both areal and vertical of the hazardous substances or environmental pollution in all affected media. The PFAS contamination identified during the site investigation conducted at this Site has not been defined in soil as well as groundwater. Also, since soil sampling has shown that PFAS compounds are contaminating soil at the discharge locations for secondary containment, surface water sampling will be necessary to determine the concentrations of PFAS in surface water resulting from the discharge of PFAS at the Site.

To fulfil its obligations under Wis. Stats. ch. 292 as well as Wis. Admin. Code ch. NR716, the DNR recommends Enbridge move forward with a supplemental site investigation that includes additional soil, groundwater, and surface water sampling to define the degree and extent of PFAS contamination. The DNR also recommends Enbridge prepare and submit a supplemental site investigation work plan for the additional investigation and submit it to DNR for review with the appropriate Wis. Admin. Code ch. NR749 review fee.

The DNR appreciates the actions Enbridge has taken to investigate PFAS at the Superior Terminal. Please contact me at <u>john.sager@wisconsin.gov</u> or (715) 919-7239 if you have any questions or if you would like to discuss planned site investigation activities.



Sincerely,

John Sager Hydrogeologist

Remediation and Redevelopment Program

C: Nick Larabel, Enbridge (via email only to nick.larabel@enbridge.com)
Leo Linnemanstons, AECOM (via email only to leo.linnemanstons@aecom.com)