

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

December 19, 2011

Enbridge Energy, Limited Partnership
c/o Mr. Rich Adams
Vice President, Operations
Superior City Centre
Second Floor
1409 Hammond Ave.
Superior, Wisconsin 54880

Re: Approval with Modifications to Enbridge Energy, Limited Partnership's December 4, 2011 Submittal in response to the Administrative Order issued by U.S. EPA on July 27, 2010 and Supplement to the Administrative Order issued by U.S. EPA on September 23, 2010, pursuant to §311(c) of the Clean Water Act (Docket No. CWA 1321-5-10-001)

Dear Mr. Adams:

U.S. EPA is writing you regarding the following document resubmitted by Enbridge Energy, Limited Partnership, Enbridge Pipelines (Lakehead) L.L.C., Enbridge Pipelines (Wisconsin), and Enbridge Energy Partners, L.P. (herein collectively referred to as "Enbridge") on December 4, 2011:

Enbridge Line 6B MP 608, Marshall, MI Pipeline Release, Addendum to the Response Plan for Downstream Impacted Areas, August 2, 2010 (Revised August 17, 2010 per U.S. EPA August 17, 2010 letter), Supplement to the Source Area Response Plan and Supplement to Response Plan for Downstream Impacted Areas, Referred to as Operations and Maintenance Work Plan. Commonly referred to as "Consolidated Work Plan for Activities through 2012," Prepared for United States Environmental Protection Agency, Enbridge Energy, Limited Partnership, Submitted: October 20, 2011, Revised by the United States Environmental Protection Agency November 17, 2011, Revised by Enbridge Energy, Limited Partnership, Submitted: December 4, 2011

The U.S. EPA approves Enbridge's above-referenced *Consolidated Work Plan for Activities through 2012* ("Work Plan") with the modifications described herein. Please provide and incorporate the following elements into the modified Work Plan:

1. The schedule proposed by Enbridge in the Work Plan is not acceptable. Specifically, the dates proposed for completion of the hydrodynamic model are critical. Accordingly, the completion of the hydrodynamic model shall be accelerated. The schedule for tasks related to the hydrodynamic model (corresponding to line items 38 through 48 on the schedule submitted by Enbridge in the Work Plan) shall be as follows:

• Bathymetry and Terrain Submittal	December 16, 2011
• Grid Setup	December 16, 2011
• Configuration for Flow and Velocity	December 30, 2011
• Analysis of Sediment Samples and Cohesion Data	January 13, 2012
• Complete Configuration including Sediment Processes	January 27, 2012
• Model Calibration	February 10, 2012
• Preliminary and Baseline Model Scenarios	February 24, 2012
• Sensitivity Testing	February 24, 2012
• Develop Scenarios/Various Simulations	March 23, 2012
• Completion of Simulation	March 23, 2012
• Run Modified Scenarios	April 6, 2012

The U.S. EPA will continue to work with Enbridge in modifying and updating the project schedule as needed including, but not limited to, establishing interim milestones for U.S. EPA review.

2. Section 1.6: Figure 1.6.2 (Science Group Support of the OSCAR Process) is missing. Please add the referenced figure.
3. Please ensure proper grammar with the use of “data” in its plural form throughout the text.
4. Please add a list of known Outstanding Sites Characterization and Reconciliation (OSCAR) sites to the revised Work Plan.
5. Section 2.2:
 - a. Page 6, Second Bullet: Please replace the existing text with “All former overbank excavation areas;”.
 - b. Page 6, Fourth Bullet: Please split the text into two bullets, one per sentence.
 - c. Page 6, paragraph following bullets: Please convert the first sentence (which starts with “Submerged oil sites identified...”) to a bullet and add it to the bulleted list immediately preceding the paragraph.
6. Section 4.3.2, the last paragraph on page 23: Reference is made to 4 stages of the adaptive management cycle, but the bullet list now has 5 items. Please correct and revise.
7. Section 4.3.4, second to last paragraph on page 29: the referenced “SCS” is defined as a “Scientific Certification System”; however, previous drafts of the Work Plan defined “SCS” as a “Survey Control Station”. Additionally, Table 4.3.2 refers to a “Survey Control Station”. Please ensure that the definition and usage of the referenced “SCS” are correct.

8. Section 4.3.8, Page 35: Please amend the list of hydrodynamic modeling phases to include sensitivity testing.
9. Attachment A, Figure 1: Include all of the inundated (pink) polygons recorded previously during the Spring 2011 reassessment. The Spring 2011 reassessment showed impacts to the two ponds at the Shady Bend Campground and these ponds should be added to the list of reassessment targets.
10. Attachment B, Figure 1: The Spring 2012 reassessment poling locations need to be expanded. A total of 439 moderate/heavy poling points fall outside the polygons identified in resubmittal of the Work Plan. In some cases, the distance from the point in question to the nearest polygon line is very small (1 to 5 ft); in many other cases there is no polygon line in the near vicinity (>100 ft). All points need to be accounted for in the maps in Attachment B, Figure 1.

The U.S. EPA will continue to review the provided maps/figures for planned poling and overbank sampling locations, and direct modifications if necessary.

Enbridge shall implement the revised Work Plan, as modified, perform tasks consistent with the Order, and comply with the U.S. EPA FOOSC's directions. Enbridge shall submit the revised Work Plan incorporating the additional modifications described above to the U.S. EPA by 17:00 Eastern time on December 21, 2011.

If you have any questions regarding letter, please contact me immediately at (231) 301-0559.

Sincerely,



Ralph Dollhopf
Federal On-Scene Coordinator and Incident Commander
U.S. EPA, Region 5

cc: L. Kirby-Miles, U.S. EPA, ORC
M. Durno, U.S. EPA
S. Vega, U.S. EPA
M. Ducharme, MDEQ
M. Alexander, MDEQ
Records Center, U.S. EPA, Reg. V