

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

October 12, 2012

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 of Enbridge Energy, Limited Partnership's August 28, 2012 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:

The United States Environmental Protection Agency ("U.S. EPA") has completed its review of the following document submitted by Enbridge Limited Partnership ("Enbridge") on August 28, 2012:

Enbridge Line 6B MP 608, Marshall, MI Pipeline Release, 2012 Morrow Lake Delta and Morrow Lake Monitoring and Management Work Plan, Prepared for the United States Environmental Protection Agency, Enbridge Energy, Limited Partnership, Submitted: August 28, 2012

Pursuant to Paragraph 18 of the July 27, 2010 Order and Paragraph 6 (Item 18.d.) of the September 23, 2010 Supplement, the U.S. EPA approves the above-referenced document subject to the modifications described below, which shall be incorporated into a revised plan and resubmitted to the U.S. EPA by 17:00 Eastern time on October 24, 2012.

1. Section 1.1 (Regulatory Framework) - Please add the following sentence:

"This Morrow Lake Delta and Morrow Lake Monitoring and Management Plan does not address recovery of accumulated submerged oil. Submerged oil recovery will be addressed separately."

2. Section 1.2 (Purpose and Objective)

- a. Please replace "potential" with "further" in the first sentence.
- b. Please replace the second sentence with the following: "The objectives of the work plan are to conduct ongoing monitoring of submerged oil movement into and within Morrow Lake and to routinely evaluate the effectiveness of the E 4.0

Containment System in mitigating further submerged oil migration into Morrow Lake."

3. Section 2.1 (2012 Poling Activities) - Please add "or as directed by the U.S. EPA" to the following sentence "Enbridge will conduct poling activities as part of the scope of work in Morrow Lake Delta and Morrow Lake at the fixed locations shown in Figure 1."
4. Section 2.1.1 (Procedures)
 - a. Please replace "6-inch diameter disk" to "8-inch diameter disk" so the procedure is consistent with the U.S. EPA-approved Sediment Poling Standard Operating Procedure.
 - b. Please add the following statement to the end of Section 2.1.1: "The objectives of this plan are to conduct ongoing and routine monitoring for submerged oil migration and effectiveness of the E4.0 Containment System. The 60 degree Fahrenheit minimum water and sediment temperature requirement for submerged oil reassessment activities will not be required for the poling activities conducted under this plan. While water and sediment temperatures will continue to be collected during poling activities conducted pursuant to this plan, the poling data will be utilized strictly as an ongoing monitoring tool and will not be considered reassessment data."
5. Section 2.2.1 (E4.0 Containment System Monitoring)
 - a. Please add a detailed description of procedures to monitor the elevation of sediment both on the upstream and downstream sides of the E4.0 Containment System half curtains. The procedure shall include a detailed description of how changes in sediment elevation will be monitored over time for potential sediment accumulation and/or scouring.
 - b. Please add the following sentence: "Enbridge will thoroughly evaluate, present and discuss E4.0 Containment System monitoring results with the U.S. EPA at least weekly, and more frequently if changed conditions warrant more frequent evaluation/presentation of results."
 - c. Please add the following sentences: "Prior to making any changes, including but not limited to configuration to the E4.0 Containment System, Enbridge will submit proposed changes to the U.S. EPA. Further, Enbridge shall not make any changes to the E4.0 Containment System without the prior approval from the U.S. EPA. Decommissioning of and/or recovery/removal of accumulated sediment from the E4.0 Containment System will be proposed by Enbridge in separate work plan(s), and will not be performed until approved by the U.S. EPA."

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Dollhopf". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

cc: L. Kirby-Miles, U.S. EPA, ORC
M. DeLong, MDEQ
Records Center, U.S. EPA, Reg. V