US ERA ARCHIVE DOCUMENT

Enbridge Line 6B MP 608 Pipeline Release Marshall, Michigan Source Contamination Removal and Verification Summary Report Talmadge Creek Section 1 Stationing 00+00L to 10+00L and 00+00R to 09+00R

Enbridge Energy September 21, 2010

Talmadge Creek Source Contamination Removal and Verification Summary Report

Section 1 of 10 - Stationing (00+00L to 10+00L) and (00+00R to 09+00R)

Overview

The Enbridge Source Area Response Plan (SAR) and Sampling and Analysis Plan (SAP), dated 2 August 2010, revised 17 August 2010 was developed to prescribe response activities related to a release of crude oil from Enbridge Energy, Limited Partnership's Line 6B MP 608 pipeline in Marshall, Michigan. A detailed and defined approach to identify and complete source removal was subsequently developed and presented in the 13 September 2010 Supplement to Source Area Response Plan Approach for Source Contamination Removal, Verification and Backfill, Talmadge Creek, Enbridge Line 6B MP 608, and the Notice of Approval of Modification dated 14 September 2010. This report presents the results of the implementation of that approach for Section 1 of 10 (Stationing left bank of Talmadge Creek: 00+00L to 10+00L and Stationing right bank of Talmadge Creek: 00+00R).

Supplemental SAR Objectives

The following remedial objectives were identified to develop guidelines and procedures to remove the source area contamination from Talmadge Creek:

- Remove free oil from the banks of Talmadge Creek;
- Stabilize the existing creek bed;
- Identify that adjacent up bank areas are not a source of free oil.

To meet these objectives, the response actions included the completion of the following activities along Talmadge Creek:

- Site clearing and grubbing of trees and vegetation to allow access road construction and implementation of free oil removal activities;
- Construction of temporary access roads into the affected area;
- Construction of flumes along Talmadge Creek to recover free oil;
- Oil and water recovery and subsequent disposal;
- Installation and maintenance of absorbent booms along Talmadge Creek;
- Soil removal, staging, and bulking of crude oil-impacted soil with eventual characterization, transport, and offsite disposal;
- Storm water management and erosion control;

• Interim source area restoration under guidance of Michigan Department of Natural Resources and Environment (MDNRE).

Section Location

For efficiency and clarity in implementation and reporting, Divisions A and B of Talmadge Creek were divided into 10 sections as illustrated in Figure 1. Each section was subsequently divided into approximately 20, 50-foot¹ linear clearance areas (stationing) on both the left and right banks of Talmadge Creek as illustrated in Figure 2, (left and right banks oriented facing downstream). This summary report addresses Section 1 as described in the table below.

Section Number	Stationing
4	Left Bank: 00+00L to 10+00L
I	Right Bank: 00+00R to 09+00R

Section Excavation Methods and Clearance Metrics

Three methods for determining the vertical limit of excavation were developed and identified as A, B, or C. These three methods are defined as:

- A No visible free oil and the clearance area passed the 40 CFR Appendix 1 to Subpart
 A of Part 435 Static Sheen Test. A test pit was then constructed and inspected by the
 United States Environmental Protection Agency (U.S. EPA) representative after 6 hours.
 If free oil was observed in the 6-hour test pit, additional excavation was completed until
 clearance was obtained via method A, B, or C. If free oil was not observed, backfilling
 was completed.
- B The vertical limit was reached due to groundwater (excavation proceeded vertically at least 6-inches into groundwater). No 6-hour test pit was required for clearance.
- C The vertical limit was reached due to the silt/clay confining layer. No 6-hour test pit was required for clearance.

In addition, an approximately 2-foot wide 48-hour observation pit/trench was installed along the wall of the excavation boundary and remained open for a minimum of 48 hours to allow the EPA representative to observe potential accumulation of free oil. If oil was observed, an evaluation of the source was conducted and an XTex curtain was installed to separate the impacted area from the clean area. If no oil was observed, or the barrier curtain was installed, backfilling proceeded.

Soil Sampling and Analysis

Soil samples were collected from the area of excavation and analyzed pursuant to MDNRE approved work plans for the following analytical parameters:

- Total Petroleum Hydrocarbons (TPH):
 - Gasoline Range Organics (GRO);
 - Diesel Range Organics (DRO);

¹ Two areas on the left bank of Talmadge Creek was 25-feet in length.

- Oil Range Organics (ORO);
- Benzene;
- Toluene;
- Ethylbenzene;
- Xylenes;
- Polynuclear Aromatics (PNAs);
- 1,2,4-Trimethlybenzene;
- 1,3,5-Trimethylbenzene;
- Barium;
- Nickel;
- Vanadium;
- Iron.

The analytical results will be evaluated as part of future assessment and remediation activities.

Deviations from SAP

No deviations from the SAP were noted in this Section.

Conclusion

All completed work for this section met the U.S. EPA metrics in compliance with the SAR and the Supplement to the SAR. No additional cleanup is required to fulfill the U.S. EPA's requirements pursuant to the Removal Administrative Order issued by U.S. EPA on July 27, 2010 (Docket No. CWA 1321-5-10-001) pursuant to §311(c) of the Clean Water Act.

Supporting Documentation

The following documentation is included as attachments to this document:

- Location maps indentifying the subject section (Figures 1 and 2);
- Photographs;
- Field notes;
- A table summarizing the following information:

- Identification of final EPA clearance method used to dictate vertical limit (A, B, or C);
- Free oil observed (for Method A);
- Odor (for Method A);
- Sheen test per 40 CFR Appendix 1 to Subpart A of Part 435 (for Method A);
- Photoionization detector (PID) headspace (for Method A);
- o Installation date and time of 6-hour test pit;
- o EPA representative sign-off and approval of backfilling;
- Installation date and time of 48-hour observation pit/trench;
- 48-hour observation.

Talmadge Creek Source Contamination Removal and Verification Summary Table: Section 1

Division	Section Number	Station Number	Creek Bank (L/R)	Final EPA Clearance Method (A, B, C)	Free Oil Observed (Y/N)	Odor (Y/N)	40 CFR Sheen Test Sheen Observed (Y/N)	PID Headspace (ppm)	Installation Date of 6-hour Test Pit	Installation Time of 6-hour Test Pit	Method A 6-hr Test Pit EPA Representative Sign-off (Y/N)	Installation Date of 48-hour Observation Trench/Pit	Installation Time of 48- hour Observation Trench/Pit	48-hour Observation Completed (Y/N)
A5	1	00+00L - 00+50L	L	Α	N	N	N	3.4	9/8/2010	1025	Υ	9/8/2010	1305	Υ
A5	1	00+50L - 01+00L	L	С	NA	NA	NA	NA	NA	NA	NA	9/8/2010	1630	Υ
A5	1	01+00L - 01+50L	L	Α	NR	N	N	0.0	9/8/2010	1145	Υ	9/9/2010	1700	Υ
A5	1	01+50L - 01+75L	L	Α	Ζ	N	N	3.7	9/8/2010	1451	Υ	9/9/2010	1710	Υ
A5	1	01+75L - 02+25L	L	В	NA	NA	NA	NA	NA	NA	NA	9/17/2010	1840	Υ
A5	1	02+25L - 02+75L	L	В	NA	NA	NA	NA	NA	NA	NA	9/9/2010	NR	Υ
A5	1	02+75L - 03+25L	L	Α	Ν	N	N	0.0	9/9/2010	1118	Υ	9/9/2010	NR	Υ
A5	1	03+25L - 03+75L	L	В	NA	NA	NA	NA	NA	NA	NA	9/11/2010	NR	Υ
A5	1	03+75L - 04+25L	L	В	NA	NA	NA	NA	NA	NA	NA	9/11/2010	NR	Υ
A5	1	04+25L - 04+75L	L	Α	Ν	N	N	0.5	9/9/2010	1311	Υ	9/9/2010	1311	Υ
A5	1	04+75L - 05+25L	L	Α	Ν	N	N	0.6	9/9/2010	1335	Υ	9/9/2010	1335	Υ
A5	1	05+25L - 05+75L	L	Α	Ν	N	N	2.3	9/9/2010	1344	Υ	9/9/2010	1344	Υ
A5	1	05+75L - 06+25L	L	Α	Ν	N	N	0.4	9/9/2010	1400	Υ	9/9/2010	1400	Υ
A5	1	06+25L - 06+50L	L	Α	NR	N	N	1.1	9/9/2010	1450	Υ	9/9/2010	1450	Υ
A5	1	06+50L - 07+00L	L	Α	Ν	N	N	0.5	9/9/2010	1514	Υ	9/9/2010	1514	Υ
A5	1	07+00L - 07+50L	L	Α	Ν	NR	N	1.5	9/17/2010	1455	Υ	9/17/2010	NR	Υ
A5	1	07+50L - 08+00L	L	С	NA	NA	NA	NA	NA	NA	NA	9/9/2010	NR	Υ
A5	1	08+00L - 08+50L	L	С	NA	NA	NA	NA	NA	NA	NA	9/9/2010	1900	Υ
A5	1	08+50L - 09+00L	L	В	NA	NA	NA	NA	NA	NA	NA	9/9/2010	1830	Υ
A5	1	09+00L - 09+50L	L	А	NR	N	N	13.2	9/9/2010	1843	Υ	9/9/2010	1830	Υ
A5	1	09+50L - 10+00L	L	Α	Ν	N	N	8.6	9/9/2010	1850	Υ	9/9/2010	NR	Υ

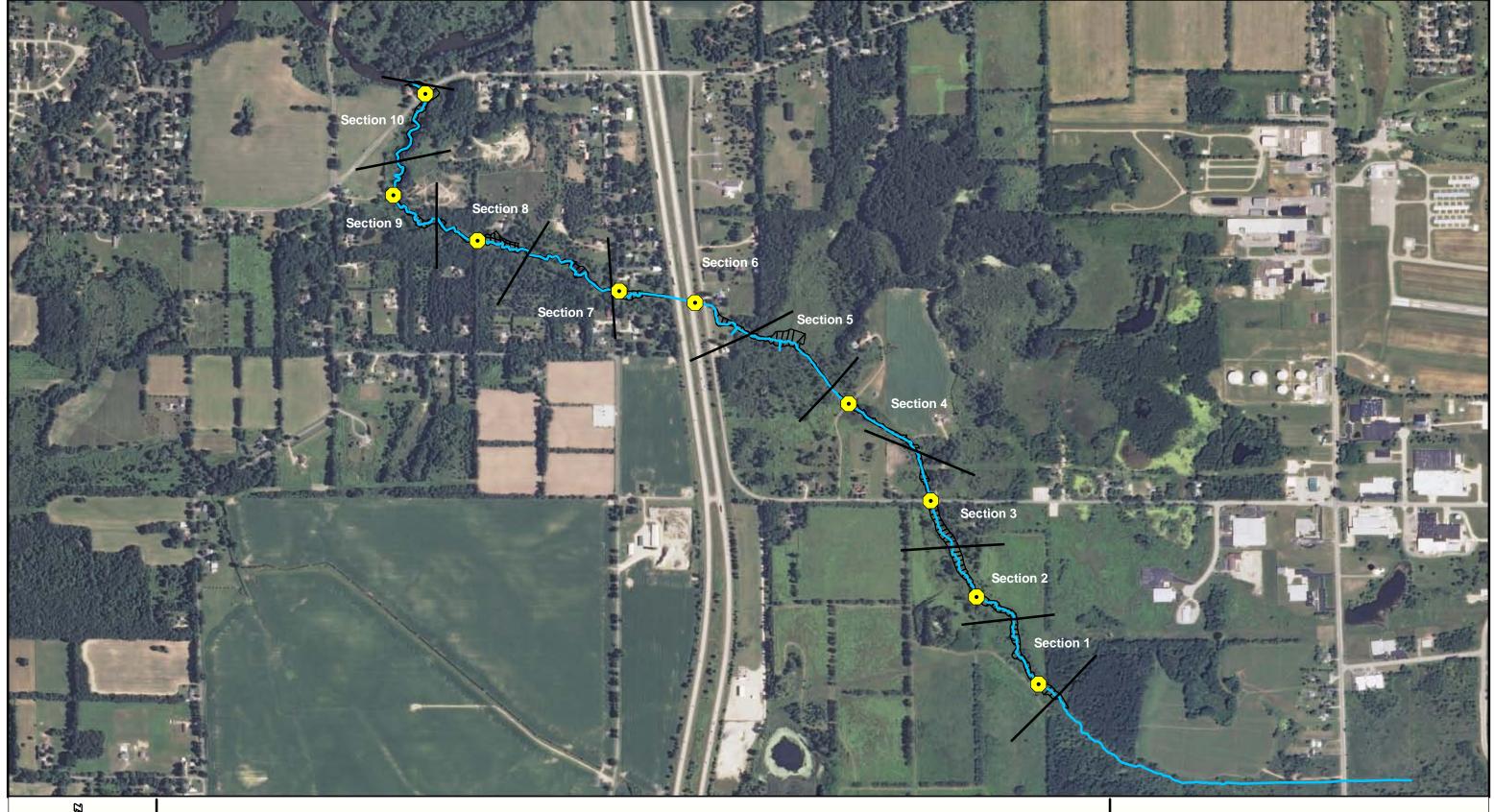
Talmadge Creek Source Contamination Removal and Verification Summary Table: Section 1

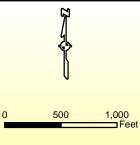
Division	Section Number	Station Number	Creek Bank (L/R)	Final EPA Clearance Method (A, B, C)	Free Oil Observed (Y/N)	Odor (Y/N)	40 CFR Sheen Test Sheen Observed (Y/N)	PID Headspace (ppm)	Installation Date of 6-hour Test Pit	Installation Time of 6-hour Test Pit	Method A 6-hr Test Pit EPA Representative Sign-off (Y/N)	Installation Date of 48-hour Observation Trench/Pit	Installation Time of 48- hour Observation Trench/Pit	48-hour Observation Completed (Y/N)
A5	1	00+00R - 00+50R	R	Α	N	N	N	0.0	9/8/2010	1020	Y	9/8/2010	1020	Υ
A5	1	00+50R - 01+00R	R	Α	Ν	N	N	0.0	9/8/2010	1046	Υ	9/8/2010	1046	Υ
A5	1	01+00R - 01+50R	R	Α	Ν	N	N	0.0	9/8/2010	1103	Υ	9/8/2010	1103	Υ
A5	1	01+50R - 02+00R	R	Α	Ν	N	N	0.0	9/8/2010	1118	Υ	9/8/2010	1118	Υ
A5	1	02+00R - 02+50R	R	Α	Ν	NR	N	1.7	9/17/2010	1430	Υ	NR	NR	NR
A5	1	02+50R - 03+00R	R	Α	Ν	N	N	2.3	9/8/2010	1144	Υ	9/17/2010	1750	Υ
A5	1	03+00R - 03+50R	R	Α	Ν	N	N	0.0	9/8/2010	1333	Y	9/8/2010	1333	Y
A5	1	03+50R - 04+00R	R	Α	Ν	N	N	0.0	9/8/2010	1405	Y	9/8/2010	1405	Υ
A5	1	04+00R - 04+50R	R	Α	Ν	N	N	0.0	9/8/2010	1418	Y	9/8/2010	1422	Υ
A5	1	04+50R - 05+00R	R	Α	Ν	N	N	1.2	9/8/2010	1452	Y	9/8/2010	1452	Υ
A5	1	05+00R - 05+50R	R	Α	Ν	N	N	0.0	9/8/2010	1522	Y	9/8/2010	1528	Y
A5	1	05+50R - 06+00R	R	Α	Ν	N	N	0.0	9/8/2010	1546	Y	9/8/2010	1549	Υ
A5	1	06+00R - 06+50R	R	Α	N	N	N	0.0	9/8/2010	1615	Y	9/8/2010	1615	Υ
A5	1	06+50R - 07+00R	R	Α	Ν	N	N	0.0	9/8/2010	1655	Y	9/8/2010	1705	Υ
A5	1	07+00R - 07+50R	R	Α	N	N	N	2.9	9/8/2010	1752	Y	9/8/2010	1800	Υ
A5	1	07+50R - 08+00R	R	Α	Ν	N	N	0.0	9/8/2010	1820	Y	9/8/2010	1830	Υ
A5	1	08+00R - 08+50R	R	Α	N	N	N	0.0	9/8/2010	1845	Y	9/8/2010	1850	Υ
A5	1	08+50R - 09+00R	R	Α	Ν	N	N	0.0	9/8/2010	1909	Y	9/8/2010	1916	Υ

Endnotes for Talmadge Creek Source Contamination Removal and Verification Summary Table

- NR Information not recorded on field log, however, U.S. EPA representative sign-off obtained.
- NA Metric not applicable to final site conditions after achieving 'B' or 'C' Method limits. Site conditions prior to achieving final excavation limits were recorded on field notes.
- ND Not Detected
- PID Photoionization detector
- ppm Parts per million

Figures





Legend



Culverts

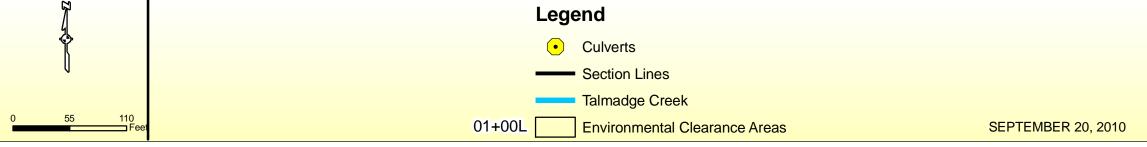


Section Lines



FIGURE 1
OVERALL SECTION LOCATION MAP
LINE 6B MP 608
MARSHALL, MICHIGAN





SECTION 1 STATION LOCATIONS
TALMADGE CREEK
LINE 6B MP 608
MARSHALL, MICHIGAN

Field Photographs



00+00L - 00+50L: Looking downstream prior to backfilling (September 8, 2010)



00+50L - 01+00L: Looking upstream at backfilling (September 8, 2010)



01+00L – 01+50L: Looking toward Talmadge Creek at 6-hour test pit prior to backfilling (September 8, 2010)



01+50L - 01+75L: Looking downstream at 6-hour test pit (September 8, 2010)



01+75L – 02+25L: Looking at road over Talmadge Creek (September 19, 2010)



02+25L - 02+75L: Looking upstream (September 9, 2010)



02+75L - 03+25L: Looking upstream (September 9, 2010)



03+25L - 03+75L: Looking toward Talmadge Creek (September 20, 2010)



03+75L - 04+25L: Looking toward Talmadge Creek (September 20, 2010)



04+25L – 04+75L: Looking toward Talmadge Creek (September 9, 2010)



04+75L - 05+25L: Looking toward Talmadge Creek (September 9, 2010)



05+25L - 05+75L: Looking toward Talmadge Creek (September 9, 2010)



05+75L - 06+25L: Looking toward Talmadge Creek (September 9, 2010)



06+25L - 06+50L: Looking toward Talmadge Creek (September 9, 2010)



06+50L - 07+00L: Looking toward Talmadge Creek (September 20, 2010)



07+00L - 07+50L: Looking at 6-hour test pit (September 9, 2010)



07+50L - 08+00L: Looking toward Talmadge Creek (September 20, 2010)



08+00L – 08+50L: Looking upstream prior to final excavation (September 9, 2010)



08+50L-09+00L: Looking toward Talmadge Creek (September 9, 2010)



09+00L - 09+50L: Looking toward Talmadge Creek (September 20, 2010)



09+50L – 10+00L: Looking toward Talmadge Creek at 6-hour test and 48-hour observation pits (September 9, 2010)



00+00R - 00+50R: Looking toward Talmadge Creek (September 19, 2010)



00+50R - 01+00R: Looking toward Talmadge Creek (September 19, 2010)



01+00R - 01+50R: Looking toward Talmadge Creek (September 19, 2010)



01+50R - 02+00R: Looking toward Talmadge Creek (September 19, 2010)



02+00R - 02+50R: Looking at road over Talmadge Creek (September 19, 2010)



02+50R - 03+00R: Looking downstream (September 15, 2010)



03+00R - 03+50R: Looking toward Talmadge Creek (September 19, 2010)



03+50R - 04+00R: Looking toward Talmadge Creek (September 19, 2010)



04+00R - 04+50R: Looking toward Talmadge Creek (September 19, 2010)



04+50R - 05+00R: Looking toward Talmadge creek at 6-hour test pit (September 15, 2010)



05+00R - 05+50R: Looking toward Talmadge Creek (September 19, 2010)



05+50R - 06+00R: Looking toward Talmadge Creek at 6-hour test and 48-hour observation pits prior to backfill (September 15, 2010)



06+00R - 06+50R: Looking toward Talmadge Creek (September 19, 2010)



06+50R - 07+00R: Looking downstream prior to backfill (September 12, 2010)



07+00R - 07+50R: Looking toward Talmadge Creek prior to backfill (September 15, 2010)



07+50R - 08+00R: Looking toward Talmadge Creek (September 20, 2010)



08+00R – 08+50R: Looking toward Talmadge Creek (September 20, 2010)



08+50R - 09+00R: Looking toward Talmadge Creek (September 20, 2010)

Field Notes

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Confining Layer (C)

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Confining Layer (C)

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Depth of Contamination (A) Groundwater (B) 3

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Depth of Contamination (A) Groundwater (B) Ξ

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NO e No Despection 88

Enbridge Backfill Approval EPA 8-hour Follow-up Inspection Observations and Time (if Applicable) Dry 18-11-10 9-11-1 G UK 1949 Completed By: DAN ROD RIGHEZ (BARK) Time of Trench Excavation 1850 9 5 1830 0 6-haur Follow-up Inspection Observations and Time (If Applicable) 0851 MOFMED, 237/410-10 529 H-10-10 Time of Test Pit 1820 1845 P P 0,0 0.0 Headspace³ 0 (2) Sheen Test Rainbow Sheen Observed 3 0 z z z z z z z 2 z z z z > > >-> > > >-> >-> >-> > N L M S N L M S S S s Ş L M S N N Ś <u>×</u> (3) (<u>z</u>) ∑ Z Σ 2 Z Z Σ ≨ Σ Σ ador, Z ... __ -1 z z z z 2 0 Free Phase Oil Observed **②** 0 z z z Z. z z z z z Z z 22131003 > > Method: Used to Photo ID Indicate Vertical A B C 7+504 8+604 1834 18 0 8+008" 8+50 1850 @ 1 c 8450 9 400 1919 10 11 c C Ü Ç C U U U U A B Limit. œ m 8 8 В œ m В æ ⋖ ۲ 4 × á 4 ٥ ⋖ ∢ Creek Section Project Number: \$ 2 豆 ₽ ₽ 2 \$ 2 2

Marshall Line 6B-MP608 Pibeline Release

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None (N), Light (L), Moderate (M), Strong (S) PID readouts in ppm above background ND × No Detection

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Depth of Contemination (A)

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Confining Layer (C)

Response to EPA Comments for Source Contamination Removal and Verification Summary Report

Enbridge Line 6B MP 608 Pipeline Release, Marshall, Michigan Talmadge Creek Section 1 of 10
Stationing 00+00L to 10+00L and 00+00R to 09+00R

The information below are responses to U.S. EPA's comments of Enbridge Energy's Talmadge Creek Section 1 of 10 Source Contamination Removal and Verification Summary Report:

1. 01+75L – 02+25L EPA's comment: needs signature (culvert crossing area)

Response: EPA signed 48-hour observation on field log on September 25, 2010, field log attached.

2. 07+00L – 07+50L EPA's comment: needs signature (pipeline area)

Response: EPA's signature for both 6-hour and 48-hour was included in the original field log which was submitted to the EPA on September 21, 2010.

3. 08+00L - 08+50L, 08+50L - 09+00L, 09+00L - 09+50L EPA's comment: photocopy of field log is ripped, missing (above noted stations)

Response: Left corner of field log which includes these clearance areas is torn-off. These clearance areas are included in the original field log which reports observations from Stationing 02+25L to 09+50L which was submitted to EPA in the original report on September 21, 2010. The legible column includes the downstream Stationing of the clearance areas and is described as follows:

07+50L = 07+50L to 08+00L 08+00L = 08+00L to 08+50L 08+50L = 08+50L to 09+00L 09+00L = 09+00L to 09+50L

4. 02+00R - 02+50R EPA's comment: needs signature (culvert crossing area)

Response: EPA signed 48-hour observation on field log on September 25, 2010, field log attached.

Completed By: Koben thesel, a K THO TTS to 2725 L Shride Sechtill Approval SAG. ¥4 #7 48-hour Follow-up inspection. Obsernations and Time (If Applicable) INE 0/00 560 3 re yest MEEDE 3 2+25-2475 Time of Trench Excevetion Vi Aual Time of Shour Follow-up inspection. Observations and Time (if Text Pit. Applicable) PA Verified 1 Fai 42 Digout 3 OCAHOL alteady Ш **全**% Vaccy wirus DIM 5 Headspace² ppm 80 83 Marshail Line 58 MP608 Pipeline Release 2/ Shean Test Rainbow Sheen Observed Z N C W S 22131003 Ó ogo a nd 8 Free Phase Off Observed Will Dig out Scrape 40 Photo ID 12 12 2 6 6 V 45012 Method Used to Indicate Vertical 18:56 5 Project Number: Project Name; Photo 15

Depth of Contamination (A). 3

Groundwater (8)
Confining Layer (C)
Confining Layer (C)
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Project Name:

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Marshall Une 68 MP608 Pipeline Release

22131003

Date: 9/17/10
Completed By: Lob Grt Nese July TP2+00 to 2+50 R

Cabridge MS = 14:00 + 1 mB Backfill Approval ₹ Time of 6-bour follow-up inspection Observations and Time (if I time of Tranch 48-bour follow-up inspection Observations and Time (if Applicable) (if Applicable) 2+50A 9222 40 2+25 14:30 Produc C|69er 70 Heatdapace³ ppm Sheen Test Relations Sheen Observed N S W 1 N Sample ò ړر Of other 01-11-10 Method Used to Indicate Vertical Umff 3. O 4:37 Photo (D

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Depth of Contamination (A)
Groundwater (8)
Confinite Lawer (C)
Nose (M), Light (L), Moderate (M), Strong (S)
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ND - No Detection