US ERA ARCHIVE DOCUMENT

Enbridge Line 6B MP 608 Pipeline Release
Marshall, Michigan
Source Contamination Removal and Verification Summary Report
Talmadge Creek Section 3
Stationing 20+00L to 30+00L and 19+25R to 29+00R

Enbridge Energy September 23, 2010

Talmadge Creek Source Contamination Removal and Verification Summary Report

Section 3 of 10 - Stationing (20+00L to 30+00L) and (19+25R to 29+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 3 of 10 (Stationing left bank of Talmadge Creek: 20+00L to 30+00L and Stationing right bank of Talmadge Creek: 19+25R to 29+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 3 as described in the table below.

Section Number	Stationing					
2	Left Bank: 20+00L to 30+00L					
3	Right Bank: 19+25R to 29+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 One area on the right bank of Talmadge Creek was 75-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;
- 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 3

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-hour 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)
A6	3	20+00L - 20+50L	L	Α	N	N	N	22.5	9/9/2010	1840	Υ	9/9/2010	1845	Υ
A6	3	20+50L - 21+00L	L	Α	N	N	N	3.4	9/9/2010	1825	Υ	9/9/2010	1800	Υ
A6	3	21+00L - 21+50L	L	В	NA	NA	NA	NA	NA	NA	NA	9/9/2010	NR	Υ
A6	3	21+50L - 22+00L	L	Α	N	N	N	ND	9/9/2010	1006	Υ	9/9/2010	1008	Υ
A6	3	22+00L - 22+50L	L	Α	N	Ν	N	17.9	9/9/2010	0948	Υ	9/9/2010	0955	Υ
A6	3	22+50L - 23+00L	L	В	NA	NA	NA	NA	NA	NA	NA	9/9/2010	0940	Υ
A6	3	23+00L - 23+50L	L	Α	N	Ν	N	ND	9/9/2010	0835	Υ	9/9/2010	0837	Υ
A6	3	23+50L - 24+00L	L	Α	N	N	N	0.25	9/8/2010	1930	Υ	9/8/2010	1935	Υ
A6	3	24+00L - 24+50L	L	Α	N	N	N	0.05	9/8/2010	1827	Υ	9/8/2010	1908	Υ
A6	3	24+50L - 25+00L						DIVISION	I DRIVE				,	
B2	3	25+00L - 25+50L	L	В	NA	NA	NA	NA	NA	NA	NA	9/18/2010	2235	Υ
B2	3	25+50L - 26+00L	L	Α	N	N	N	1.5	9/12/2010	1734	Υ	9/12/2010	NR	Υ
B2	3	26+00L - 26+50L	L	Α	N	N	N	3.4	9/12/2010	0904	Υ	9/13/2010	NR	Υ
B2	3	26+50L - 27+00L	L	Α	N	Υ	Υ	34.1	9/14/2010	1750	N	9/14/2010	1755	Υ
B2	3	27+00L - 27+50L	L	Α	N	N	N	0.0	9/14/2010	1500	Υ	9/14/2010	1506	Υ
B2	3	27+50L - 28+00L	L	Α	N	Υ	Υ	2.7	9/14/2010	1430	Υ	9/14/2010	1443	Υ
B2	3	28+00L - 28+50L	L	Α	N	N	N	1.1	9/14/2010	1045	Υ	9/14/2010	1053	Υ
B2	3	28+50L - 29+00L	L	Α	N	N	N	1.5	9/14/2010	1810	Υ	9/14/2010	1815	Υ
B2	3	29+00L - 29+50L	L	Α	NR	NR	NR	NR	9/15/2010	NR	Υ	9/15/2010	NR	Υ
B2	3	29+50L - 30+00L	L	Α	N	N	N	1.6	9/15/2010	0921	Υ	9/15/2010	0921	Υ

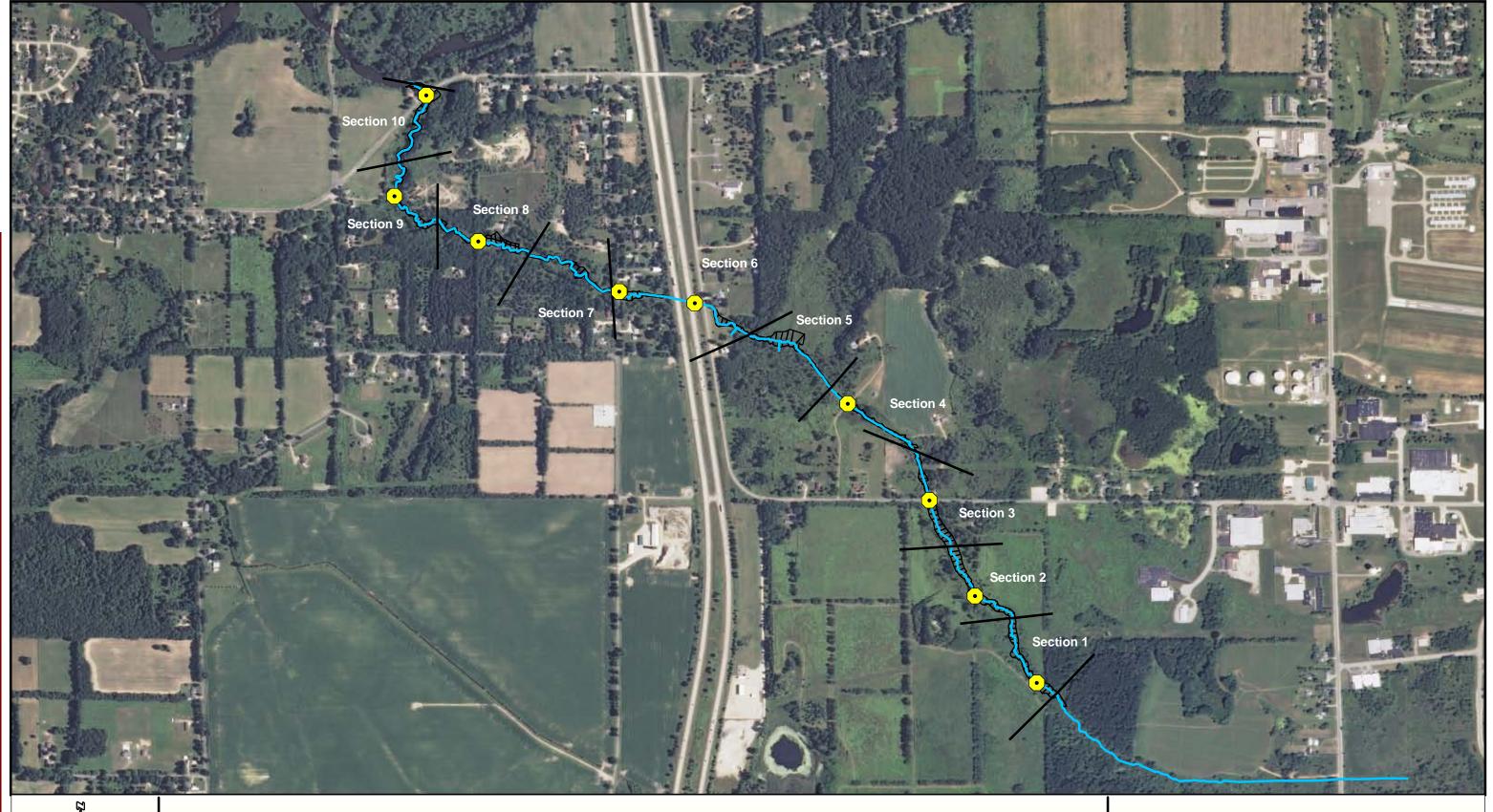
Talmadge Creek Source Contamination Removal and Verification Summary Table: Section 3

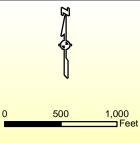
Division	Section Number	Station Number	Creek Bank (L/R)	Final EPA Clearance Method (A, B, C)	Free Oil Observed (Y/N)	Odor (Y/N)	40 CFR Sheen Test Sheen Observed (Y/N)	PID Headspace (ppm)	Installation Date of 6- hour Test Pit	Installation Time of 6- hour Test Pit	Method A 6-hour Test Pit EPA Representative 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)
A6	3	19+25R - 19+75R	R	С	NA	NA	NA	NA	NA	NA	NA	9/9/2010	NR	Υ
A6	3	19+75R - 20+25R	R	Α	N	N	N	0.0	9/9/2010	1440	Υ	9/9/2010	1440	Υ
A6	3	20+25R - 20+75R	R	С	NA	NA	NA	NA	NA	NA	NA	9/9/2010	NR	Υ
A6	3	20+75R - 21+25R	R	Α	N	N	N	0.0	9/9/2010	1132	Υ	9/9/2010	NR	Υ
A6	3	21+25R - 21+75R	R	С	NA	NA	NA	NA	NA	NA	NA	9/9/2010	NR	Υ
A6	3	21+75R - 22+25R	R	Α	N	N	N	0.2	9/9/2010	1050	Υ	9/9/2010	NR	Υ
A6	3	22+25R - 22+75R	R	Α	N	N	N	0.3	9/9/2010	1030	Υ	9/9/2010	NR	Υ
A6	3	22+75R - 23+25R	R	Α	N	N	N	1.1	9/9/2010	1000	Υ	9/9/2010	1005	Υ
A6	3	23+25R - 23+75R	R	Α	N	N	N	0.2	9/9/2010	0930	Υ	9/9/2010	0934	Υ
B2	3	23+75R - 24+50R	R	В	NA	NA	NA	NA	NA	NA	NA	9/18/2010	2200	Υ
B2	3	24+50R - 25+00R	R	Α	N	N	N	1.5	9/12/2010	1640	Υ	9/12/2010	1640	Υ
B2	3	25+00R - 25+50R	R	Α	N	N	N	4.4	9/12/2010	1620	Υ	9/12/2010	1620	Υ
B2	3	25+50R - 26+00R	R	Α	N	N	N	2.3	9/12/2010	1555	Υ	9/12/2010	NR	Υ
B2	3	26+00R - 26+50R	R	Α	N	N	N	7.9	9/12/2010	1528	Υ	9/12/2010	NR	Υ
B2	3	26+50R - 27+00R	R	Α	N	N	N	1.9	9/12/2010	1510	Υ	9/12/2010	NR	Υ
B2	3	27+00R - 27+50R	R	Α	N	N	N	2.8	9/14/2010	1330	Υ	9/14/2010	1335	Υ
B2	3	27+50R - 28+00R	R	Α	N	N	N	7.9	9/14/2010	1355	Υ	9/14/2010	1358	Υ
B2	3	28+00R - 28+50R	R	Α	N	N	Υ	1.1	9/12/2010	1450	Υ	9/12/2010	NR	Υ
B2	3	28+50R - 29+00R	R	Α	N	N	N	0.0	9/12/2010	1030	Υ	9/12/2010	NR	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

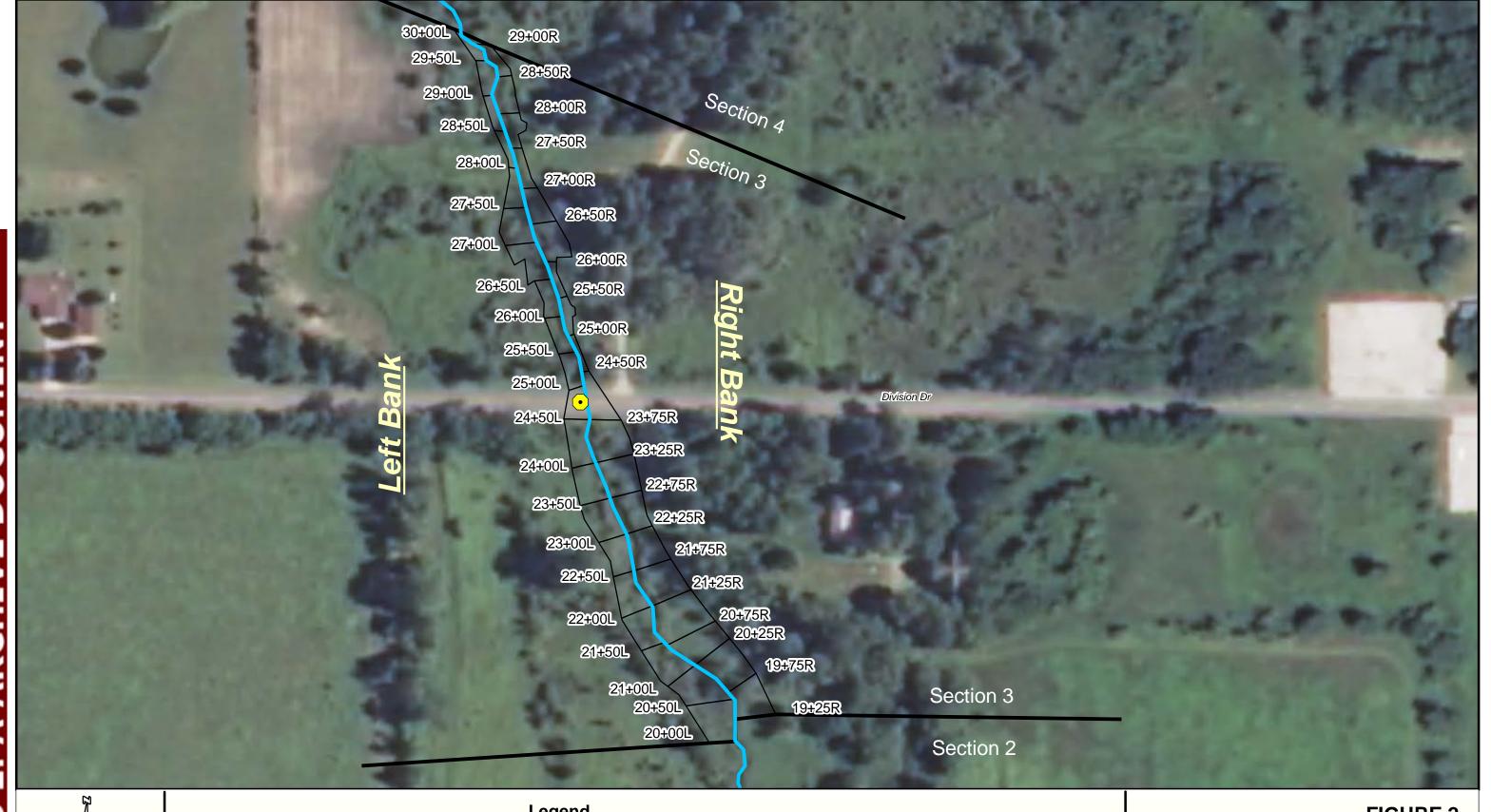


Section Lines



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

SEPTEMBER, 2010



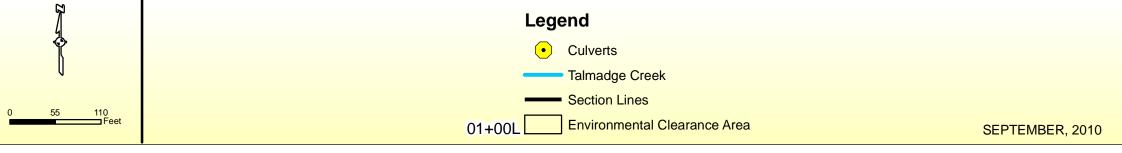


FIGURE 2
SECTION 3 STATION LOCATIONS
TALMADGE CREEK
LINE 6B MP 608
MARSHALL, MICHIGAN

Field Photographs



20+00L - 20+50L: Looking downstream (September 9, 2010)



20+50L - 21+00L: Looking downstream (September 10, 2010)



21+00L - 21+50L: Looking upstream(September 9, 2010)



21+50L - 22+00L: Looking upstream (September 9, 2010)



22+00L - 22+50L: Looking upstream (September 9, 2010)



22+50L - 23+00L: Looking upstream at area cleared for backfill (September 9, 2010)



23+00L - 23+50L: Looking upstream at backfill (September 10, 2010)



23+50L - 24+00L: Looking downstream (September 8, 2010)



24+00L – 24+50L: Looking downstream at Division Drive over Talmadge Creek (September 8, 2010)



24+50L – 25+00L: Looking toward Talmadge Creek (September 19, 2010)



25+00L - 25+50L: Looking at 6-hour test pit (September 12, 2010)



25+50L – 26+00L: Looking toward Talmadge Creek at 6-hour test pit (September 12, 2010)



26+00L - 26+50L: Looking toward Talmadge Creek at 6-hour test pit (September 13, 2010)



26+50L - 27+00L: Looking toward Talmadge Creek (September 14, 2010)



27+00L - 27+50L: Looking toward Talmadge Creek at 6-hour test pit (September 14, 2010)



27+50L – 28+00L: Looking toward Talmadge Creek (September 14, 2010)



28+00L - 28+50L: Looking toward Talmadge Creek at 6-hour test pit (September 14, 2010)



28+50L – 29+00L: Looking toward Talmadge Creek at 6-hour test pit (September 14, 2010)



29+00L - 29+50L: Looking toward Talmadge Creek (September 19, 2010)



29+50L - 30+00L: Looking toward Talmadge Creek at 6-hour test pit (September 15, 2010)



19+25R – 19+75R: Looking downstream at 48-hour observation pit (September 10, 2010)



19+75R – 20+25R: Looking toward Talmadge Creek at area cleared for backfill (September 10, 2010)



20+25R - 20+75R: Looking upstream (September 10, 2010)



20+75R – 21+25R: Looking downstream Talmadge Creek at excavated area after pumping (September 14, 2010)



21+25R - 21+75R: Looking toward Talmadge Creek (September 19, 2010)



21+75R – 22+25R: Looking toward Talmadge Creek (September 19, 2010)



22+25R - 22+75R: Looking toward Talmadge Creek (September 19, 2010)



22+75R - 23+25R: Looking toward Talmadge Creek (September 19, 2010)



23+25R - 23+75R: Looking upstream at 48-hour observation pit (September 15, 2010)



23+75R – 24+50R: Looking toward Talmadge Creek at 6-hour test pit (September 19, 2010)



24+50R - 25+00R: Looking toward Talmadge Creek at 6-hour test pit (September 12, 2010)



25+00R – 25+50R: Looking toward Talmadge Creek at 48-hour observation pit (September 17, 2010)



25+50R - 26+00R: Looking toward Talmadge Creek (September 19, 2010)



26+00R – 26+50R: Looking toward Talmadge Creek at 6-hour test pit (September 12, 2010)



26+50R - 27+00R: Looking at 6-hour test pit (September 12, 2010)



27+00R - 27+50R: Looking toward Talmadge Creek (September 19, 2010)



27+50R - 28+00R: Looking at 48-hour observation pit (September 17, 2010)



28+00R - 28+50R: Looking toward Talmadge Creek at scraped area (September 12, 2010)



28+50R- 29+00R: Looking at 48-hour observation pit (September 12, 2010)

Field Notes

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Project Number:	23.75 R. 24.56 Photo 10 Indicate CA+5012 Either R N N Vertea	Comments Oxford Africa	Ì	WEE)	103452 or 10052		043	OJ.	Comments		

Depth of Contamination (A)
Groundwater (B)
Conflining Layer (C)
Mone (M), Light (L), Moderate (M), Strong (S)
P(O readouts in ppm above background
ND = No Detection

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Date:

Marshall Line 6B MP608 Pipeline Release

Project Name:

Date: Marshafl Line 68 MP608 Pipeline Release 22131003

Project Number:

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None (N), Ught (t), Moderate (M), Strong (s) PID readouts in ppm above background ND = No Detection

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Depth of Contamination (A) Confining Layer (C) Groundwater (B)

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Date: Completed By:	Time of test Pit	105 1640 8	2 1715 S 1747 8/27 4 unals	7
	Sheen Test Rainbow ppm Sheen Observed 7	- 8	(S)	0257
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Depth of Contamination (A)
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Marshall Line 68 MP608 Pipeline Release

Project Name:

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Marshall Line 6B MP608 Pipeline Release

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

Enbridge Line 6B MP 608 Pipeline Release, Marshall, Michigan Talmadge Creek Section 3 of 10 Stationing 20+00L to 30+00L and 19+25R to 29+00R

The information below are responses to U.S. EPA's comments of Enbridge Energy's Talmadge Creek Section 3 of 10 Source Contamination Removal and Verification Summary Report:

1. 21+25L – 21+75L EPA's comment: signature crossed out

Response: EPA signature for 48-hour observation was provided on the field log for this clearance area and was provided in the original report submitted to the EPA on September 23, 2010. A 6-hour observation signature is not required for this clearance area as Method C was applied.

2. 24+50L – 25+00L EPA's comment: needs signature (appears to be gravel driveway)

Response: Field log for this clearance area was incorrectly labeled as Stationing 25+00L to 25+50L (Division Drive). AECOM did not revise the field log's clearance area stationing after the labeling error was identified. EPA did later sign this field log for Division Road on September 25, 2010, field log is attached.

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Marshall Line 68 MP608 Pipeline Release

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