

Enbridge Line 6B MP 608 Pipeline Release Marshall, Michigan Source Contamination Removal and Verification Summary Report Talmadge Creek Section 4 Stationing 30+00L to 40+00L and 29+00R to 39+00R

Enbridge Energy September 24, 2010

Talmadge Creek Source Contamination Removal and Verification Summary Report

Section 4 of 10 - Stationing (30+00L to 40+00L) and (29+00R to 39+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 4 of 10 (Stationing left bank of Talmadge Creek: 30+00L to 40+00L and Stationing right bank of Talmadge Creek: 29+00R to 39+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-foot 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 4 as described in the table below.

Section Number	Stationing						
4	Left Bank: 30+00L to 40+00L Right Bank: 29+00R to 39+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.

A deviation from the above noted methods was also established. This deviation is noted as "Special Condition EPA Approval" in this report, and was established because no EPA methods were applicable for certain clearance areas due to site specific conditions. EPA approval was obtained for each clearance area where a special condition was encountered.

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):
 - o Gasoline Range Organics (GRO);
 - Diesel Range Organics (DRO);
 - 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);
 - Installation date and time of 6-hour test pit;
 - o EPA representative sign-off and approval of backfilling;
 - o Installation date and time of 48-hour observation pit/trench;
 - o 48-hour observation.

Table



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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)
B2	4	30+00L - 30+50L	L	Α	N	Ν	Ν	1.3	9/15/2010	0927	Y	9/15/2010	0927	Y
B2	4	30+50L - 31+00L	L	С	NA	NA	NA	NA	NA	NA	NA	9/20/2010	1340	Y
B2	4	31+00L - 31+50L	L	А	N	Ν	Ν	2.3	9/14/2010	1750	Y	9/14/2010	750	Y
B2	4	31+50L - 32+00L	L	А	N	Ν	Ν	2.8	9/14/2010	1732	Y	9/14/2010	1732	Y
B2	4	32+00L - 32+50L	L	А	N	Ν	Ν	3.0	9/14/2010	1700	Y	9/14/2010	1700	Y
B2	4	32+50L - 33+00L	L	С	NA	NA	NA	NA	NA	NA	NA	9/19/2010	1710	Y
B2	4	33+00L - 33+50L	L	А	N	Ν	Ν	0.0	9/20/2010	1110	Y	9/20/2010	1110	Y
B2	4	33+50L - 34+00L	L	С	NA	NA	NA	NA	NA	NA	NA	9/20/2010	1132	Y
B2	4	34+00L - 34+50L	L		Special Condition EPA Approval							9/20/2010	1145	Y
B2	4	34+50L - 35+00L	L	А	N	Z	Ν	2.7	9/14/2010	1618	Y	9/14/2010	1618	Y
B2	4	35+00L - 35+50L	L	А	N	Ν	Ν	2.3	9/14/2010	1315	Y	9/14/2010	1315	Y
B2	4	35+50L - 36+00L	L	В	NA	NA	NA	NA	NA	NA	NA	9/19/2010	1730	Y
B2	4	36+00L - 36+50L	L	А	N	Ν	N	1.2	9/13/2010	1731	Y	9/13/2010	1740	Y
B2	4	36+50L - 37+00L	L	А	N	Ν	Ν	0.2	9/20/2010	1448	Y	9/20/2010	1448	Y
B2	4	37+00L - 37+50L	L	А	N	Ν	N	0.0	9/13/2010	1701	Y	9/13/2010	1701	Y
B2	4	37+50L - 38+00L	L	А	N	Ν	N	0.5	9/20/2010	1530	Y	9/20/2010	1530	Y
B2	4	38+00L - 38+50L	L	А	N	Ν	N	1.5	9/13/2010	1618	Y	9/13/2010	1625	Y
B2	4	38+50L - 39+00L	L	А	N	Ν	N	1.6	9/13/2010	1605	Y	9/13/2010	1605	Y
B2	4	39+00L - 39+50L	L	А	N	Ν	N	1.2	9/13/2010	1547	Y	9/13/2010	1547	Y
B2	4	39+50L - 40+00L	L	А	N	Ν	N	0.8	9/13/2010	1531	Y	9/13/2010	1531	Y

Talmadge Creek Source Contamination Removal and Verification Summary Table: Section 4

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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)
B2	4	29+00R - 29+50R	R	А	N	Ν	Ν	0.0	9/12/2010	1010	Y	9/12/2010	1010	Y
B2	4	29+50R - 30+00R	R	В	NA	NA	NA	NA	NA	NA	NA	9/19/2010	1555	Y
B2	4	30+00R - 30+50R	R	А	N	Ν	Ν	4.1	9/14/2010	1437	Y	9/14/2010	1445	Y
B2	4	30+50R - 31+00R	R	А	Y*	Ν	Ν	70.3	9/14/2010	1545	Y	9/14/2010	1550	Y
B2	4	31+00R - 31+50R	R	А	N	N	Ν	2.8	9/13/2010	1405	Y	9/13/2010	1410	Y
B2	4	31+50R - 32+00R	R	А	N	N	Ν	2.4	9/13/2010	1425	Y	9/13/2010	1430	Y
B2	4	32+00R - 32+50R	R	А	N	N	Ν	5.9	9/13/2010	1455	Y	9/13/2010	1500	Y
B2	4	32+50R - 33+00R	R	А	γ *	Y	Ν	228.0	9/13/2010	1704	Y	9/13/2010	1706	Y
B2	4	33+00R - 33+50R	R	А	N	N	N	6.8	9/15/2010	1050	Y	9/15/2010	1102	Y
B2	4	33+50R - 34+00R	R	А	N	N	Ν	1.0	9/13/2010	1822	Y	9/13/2010	1822	Y
B2	4	34+00R - 34+50R	R	А	N	N	N	0.8	9/13/2010	1845	Y	9/13/2010	1845	Y
B2	4	34+50R - 35+00R	R	А	N	N	Ν	0.7	9/18/2010	1615	Y	9/18/2010	1620	Y
B2	4	35+00R - 35+50R	R	А	N	N	N	0.0	9/14/2010	1000	Y	9/14/2010	1000	Y
B2	4	35+50R - 36+00R	R	А	N	N	Ν	0.9	9/14/2010	0945	Y	9/14/2010	0945	Y
B2	4	36+00R - 36+50R	R	А	N	N	N	0.0	9/13/2010	1820	Y	9/13/2010	1820	Y
B2	4	36+50R - 37+00R	R	А	N	N	N	0.4	9/14/2010	0925	Y	9/14/2010	0925	Y
B2	4	37+00R - 37+50R	R	В	NA	NA	NA	NA	NA	NA	NA	9/20/2010	1715	Y
B2	4	37+50R - 38+00R	R	А	N	N	N	0.4	9/11/2010	1755	Y	9/11/2010	1800	Y
B2	4	38+00R - 38+50R	R	А	N	N	N	1.1	9/11/2010	1740	Y	9/11/2010	1743	Y
B2	4	38+50R - 39+00R	R	А	N	Ν	N	0.7	9/11/2010	1730	Y	9/11/2010	1730	Y

Talmadge Creek Source Contamination Removal and Verification Summary Table: Section 4

Endnotes for Talmadge Creek Source Contamination Removal and Verification Summary Table

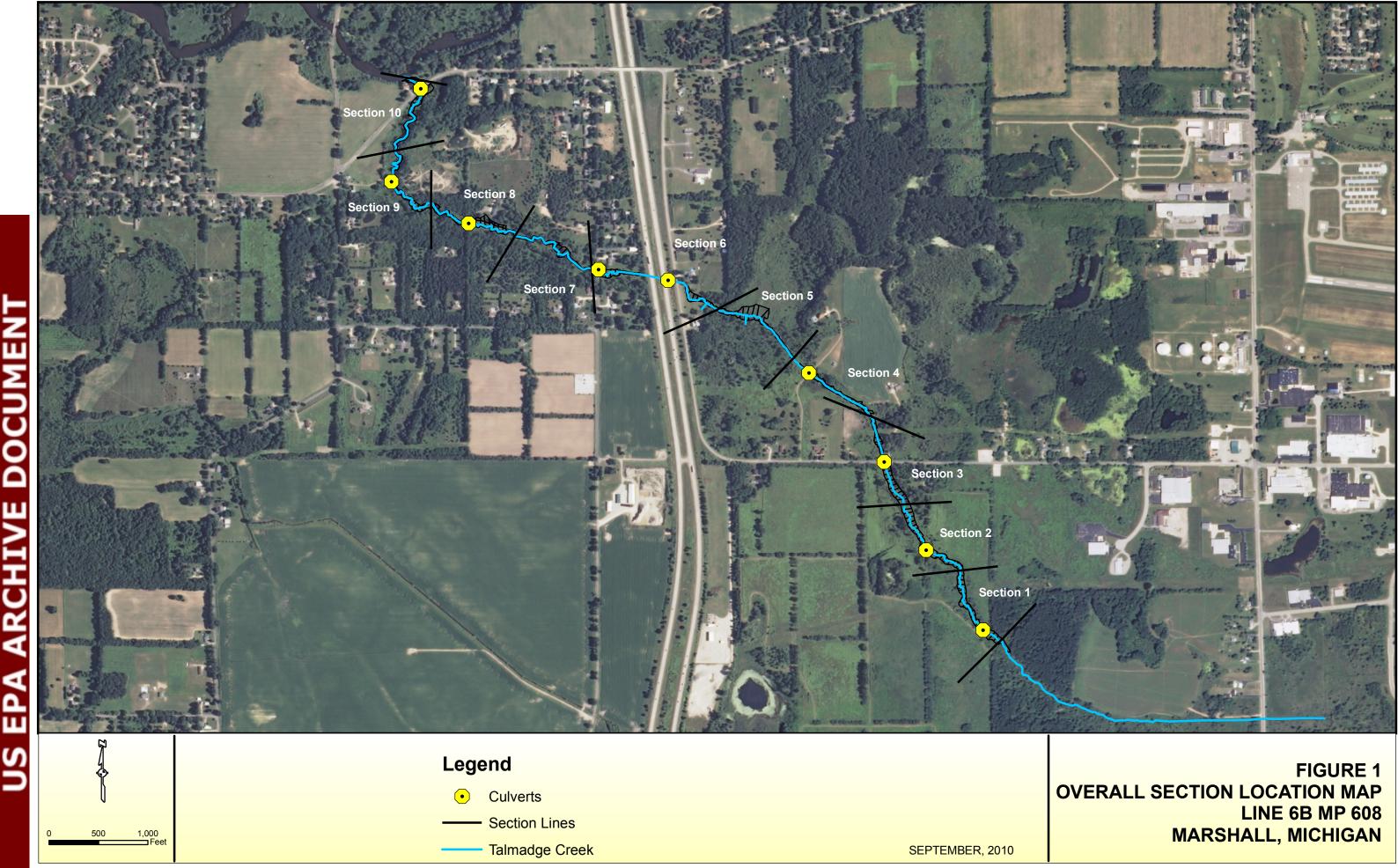
- NR Information not recorded on field log, however, U.S. EPA representative sign-off obtained.
- NA Metric not applicable to final site conditions after achieving 'B' or 'C' Method limits. Site conditions prior to achieving final excavation limits were recorded on field notes.
- ND Not Detected
- PID Photoionization detector
- ppm Parts per million
 - Field logs do not reflect the final observations; however, EPA approval was obtained in accordance with EPA
 Method A Metrics.

Special Condition EPA Approval

No EPA method was established for this clearance area due to site specific conditions that did not allow for - completion using the EPA Approved Methods A, B, or C. EPA approval was obtained for each clearance area where a special condition was encountered.

Figures





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Field Photographs





30+00L - 30+50L: Looking away from Talmadge Creek (September 14, 2010)



30+50L - 31+00L: Looking upstream at 6-hour test pit (September 14, 2010)



31+00L - 31+50L: Looking toward Talmadge Creek (September 14, 2010)



31+50L - 32+00L: Looking toward Talmadge Creek (September 14, 2010)



32+00L - 32+50L: Looking upstream (September 14, 2010)



32+50L - 33+00L: Looking upstream (September 15, 2010)



33+00L - 33+50L: Looking toward Talmadge Creek (September 19, 2010)



33+50L - 34+00L: Looking upstream (September 13, 2010)



34+00L - 34+50L: Looking upstream (September 23, 2010)



34+50L - 35+00L: Looking toward Talmadge Creek (September 14, 2010)



35+00L - 35+50L: Looking toward Talmadge Creek (September 23, 2010)



35+50L - 36+00L: Looking upstream (September 14, 2010)



36+00L - 36+50L: Looking downstream (September 15, 2010)



36+50L - 37+00L: Looking toward Talmadge Creek at 6-hour test pit (September 20, 2010)



37+00L - 37+50L: Looking toward Talmadge Creek (September 15, 2010)



37+50L – 38+00L: Looking toward Talmadge Creek at 6-hour test pit (September 20, 2010)



38+00L - 38+50L: Looking downstream (September 23, 2010)



38+50L - 39+00L: Looking toward Talmadge Creek (September 13, 2010)



39+00L - 39+50L: Looking downstream (September 15, 2010)



39+50L – 40+00L: Looking toward Talmadge Creek (September 13, 2010)



29+00R - 29+50R: Looking toward Talmadge Creek at 6-hour test pit (September 12, 2010)



29+50R - 30+00R: Looking downstream (September 12, 2010)



30+00R - 30+50R: Looking at 6-hour test pit (September 14, 2010)



30+50R - 31+00R: Looking toward Talmadge Creek (September 14, 2010)



31+00R - 31+50R: Looking at 6-hour test pit (September 13, 2010)



31+50R - 32+00R: Looking toward Talmadge Creek (September 13, 2010)



32+00R - 32+50R: Looking toward Talmadge Creek (September 13, 2010)



32+50R - 33+00R: Looking upstream (September 13, 2010)



33+00R - 33+50R: Looking toward Talmadge Creek (September 14, 2010)



33+50R - 34+00R: Looking toward Talmadge Creek (September 13, 2010)



34+00R - 34+50R: Looking downstream (September 13, 2010)



34+50R - 35+00R: Looking downstream (September 23, 2010)



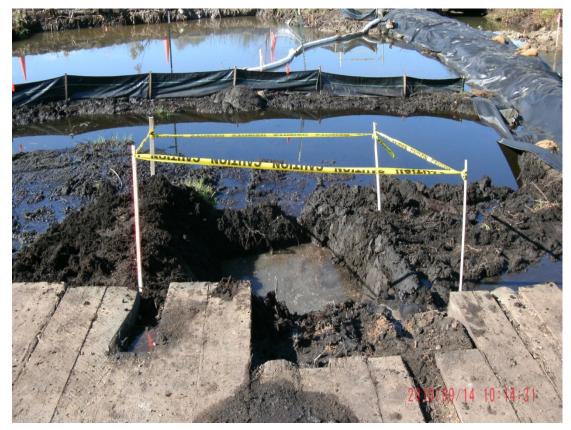
35+00R - 35+50R: Looking toward Talmadge Creek at 6-hour test pit (September 17, 2010)



35+50R - 36+00R: Looking toward Talmadge Creek (September 14, 2010)



36+00R - 36+50R: Looking toward Talmadge Creek at 6-hour test pit (September 15, 2010)



36+50R - 37+00R: Looking toward Talmadge Creek (September 17, 2010)



37+00R - 37+50R: Looking at 6-hour test pit (September 16, 2010)



37+50R - 38+00R: Looking from Talmadge Creek toward mat road (September 11, 2010)



38+00R - 38+50R: Looking at 6-hour test pit (September 11, 2010)



38+50R – 39+00R: Looking toward Talmadge Creek at 6-hour test pit (September 11, 2010)

Field Notes



FRANK	Time of 48-hour Follow-up Inspection Backfill Approval Excavation (If Applicable) Epa Entrick (If Applicable) Epa				Add Mar 40 55			1162 ACT 40			
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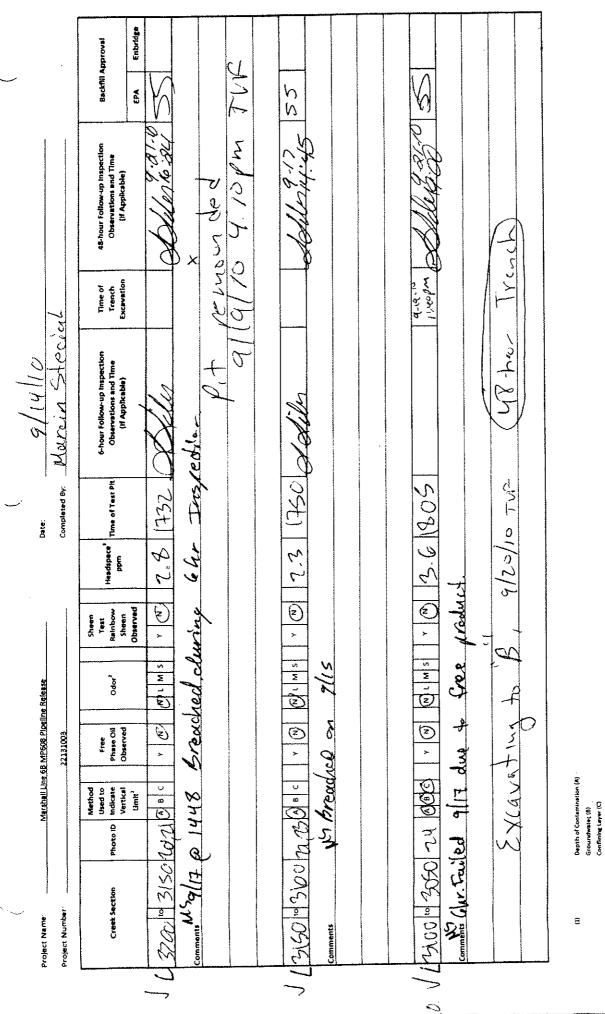
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Depth of Contamination (A) Groundwater (B) Confining Layer (C) None (N), Light (L), Moderate (M), Strong (S) FID readouts in ppm above background ND = No Detection

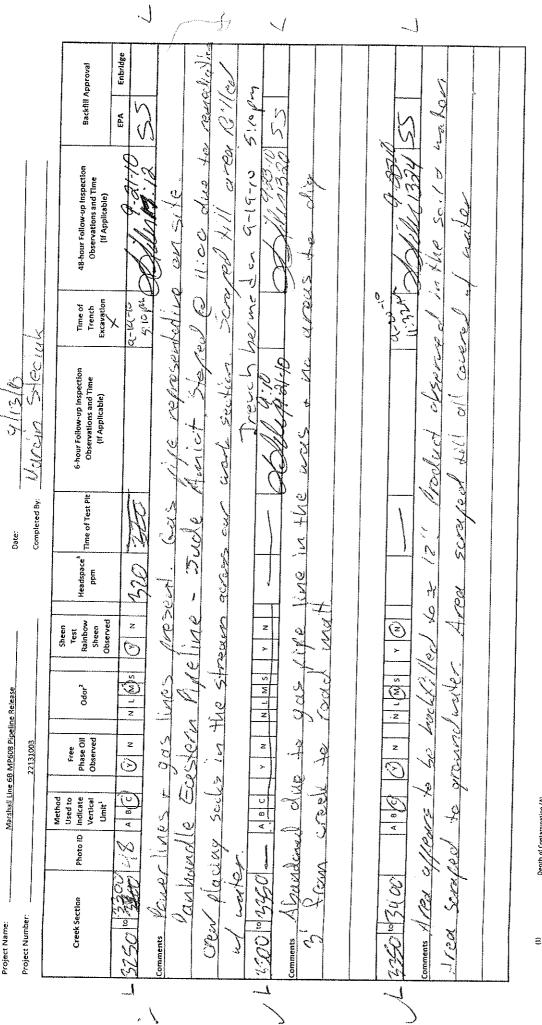
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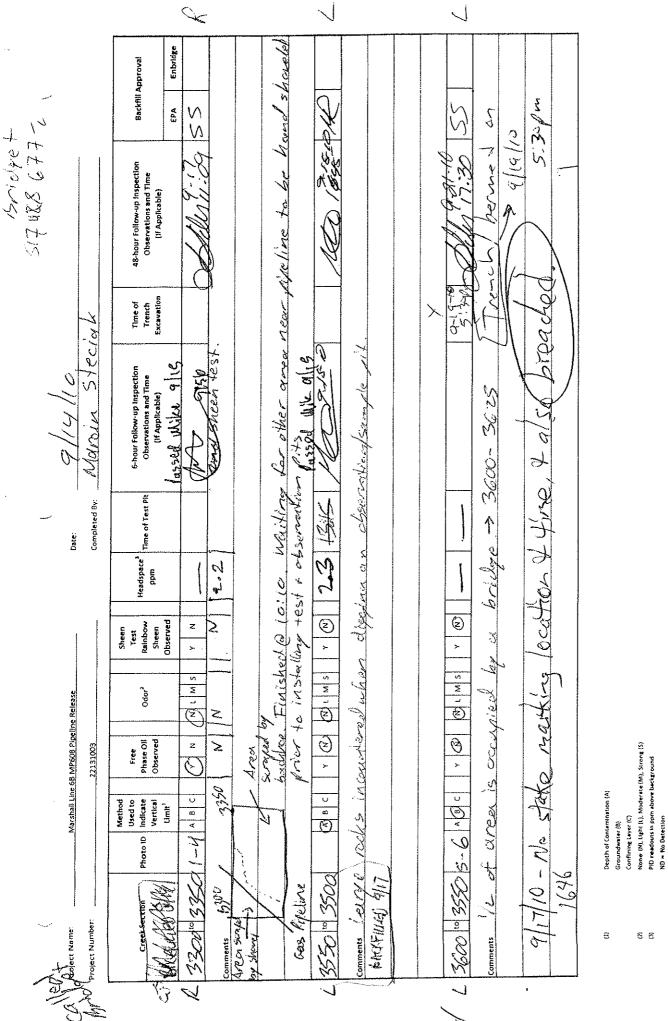


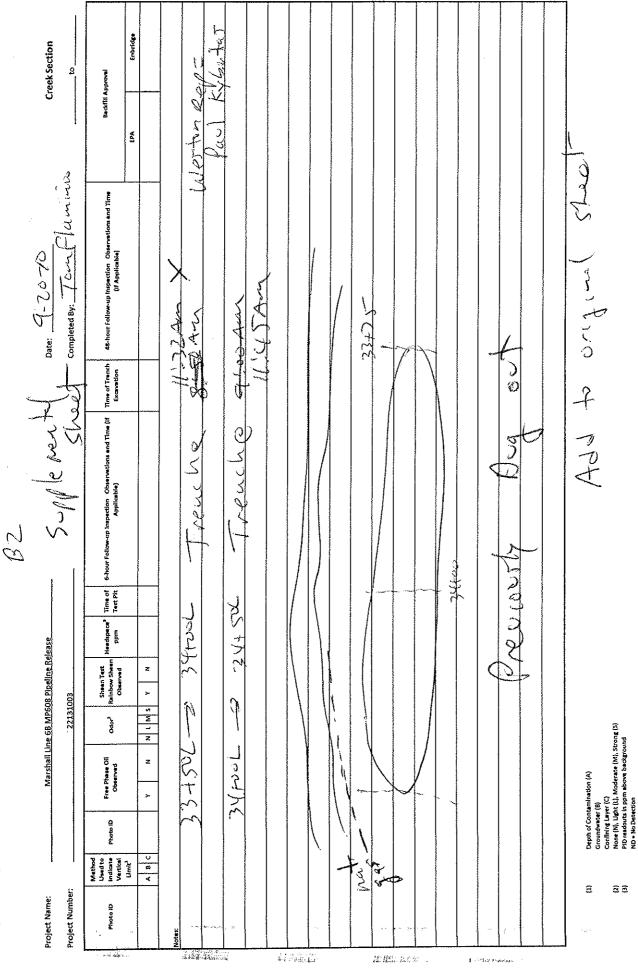
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- Depth of Contamination (A) Groundwater (8)
 - Confining Layer (C)
- None (NJ, Light (L), Moderate (M), Strong (S)

- PID readouts in ppm above background
 - ND = No Detection





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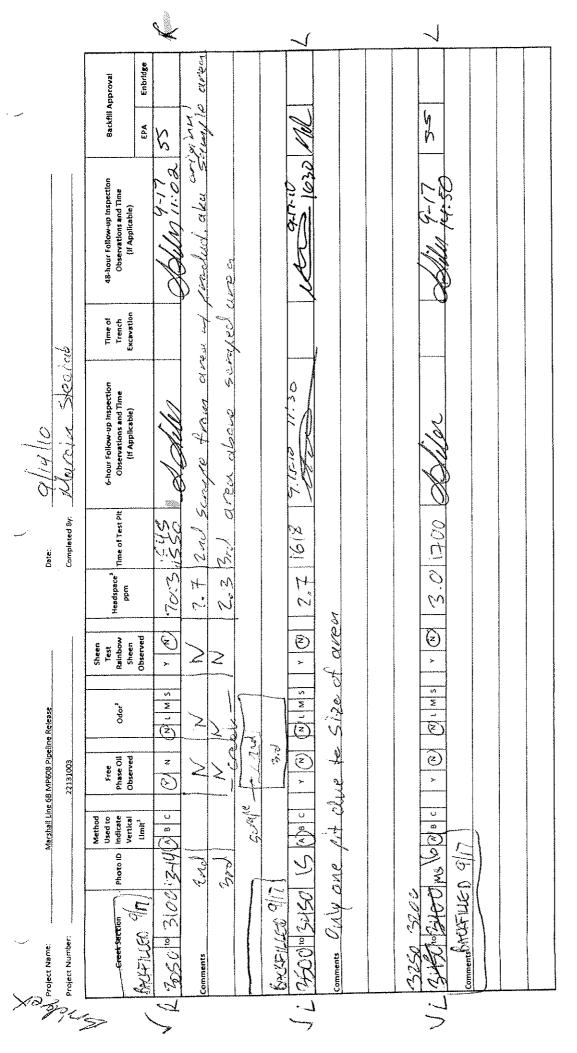
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Depth of Contamination (A) Groundwater (B) Confinite Lawer (C) None (N), Light (L), Moderate (M), Strong (S) None (N), Light (L), Moderate (M), Strong (S) None (N) Light (C) (A)

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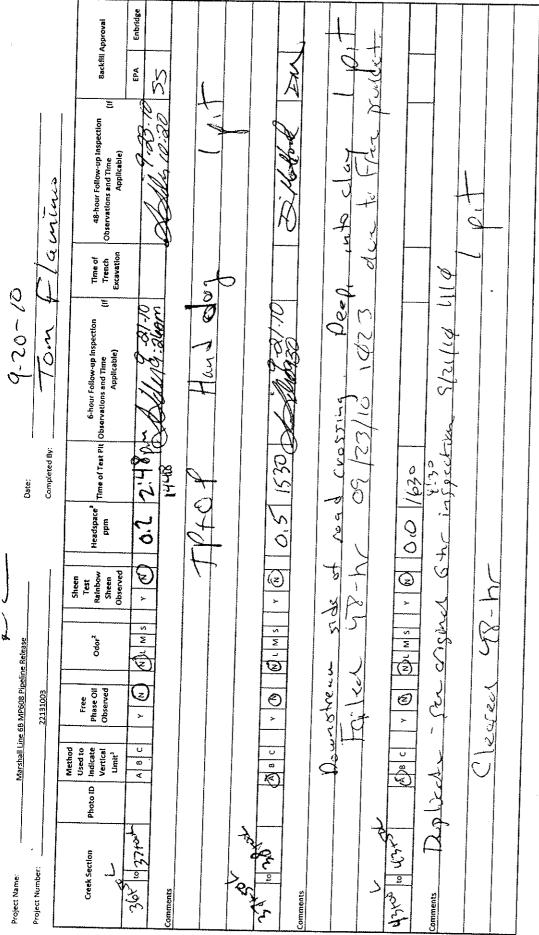
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Depth of Contamination (A) Confining Layer (C) Groundwater (8) Ξ 8 8

None (N), Light (L), Moderate (M), Strong (S)

PID readouts in ppm above background ND - No Detection



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Depth of Contamination (A)

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Groundwater (B)

Confining Layer (C)

None (N), Light (L), Moderate (M), Strong (S)

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PID readouts in ppm above background

ND * No Detection

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CALTZ 2010 KYAN FIZANK	6-hour follow-up inspection Time of 48-hour follow-up inspection Backfill Approval 0bservations and Time Trench 0bservations and Time Backfill Approval (if Applicable) Excavation (if Applicable) Facavation	The First of the second	MR		NO PIT- ISLAND IS SMALL. SHEEN		01/12/1 0/12/0 0/12/-1	Mind care and and	· ·	
Date: Completed By:	Headspace ¹ Time of Test Pit ppm	@ 0.0 1761 ONE	turem.		CREEK ETC-EG No		5/-2 12/12/1			
Marshall Line 68 MP608 Pipeline Release 22131003	Method Free Sheen Used to Free Cdo ² Sheen Test Indicate Phase Oll Odo ² Rainbow Vertical Observed Umit ² Observed Observed		comments FLUTNE ATCEA . FOT AT SUDE OF	B I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I I	AP TO	1659 DNUY, 1.113				
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Depth of Contamination (A) Groundwater (B) Confining Layer (C) None (N), Light (L), Moderate (M), Strong (S) PID readouts in ppm above background ND = NO Detection

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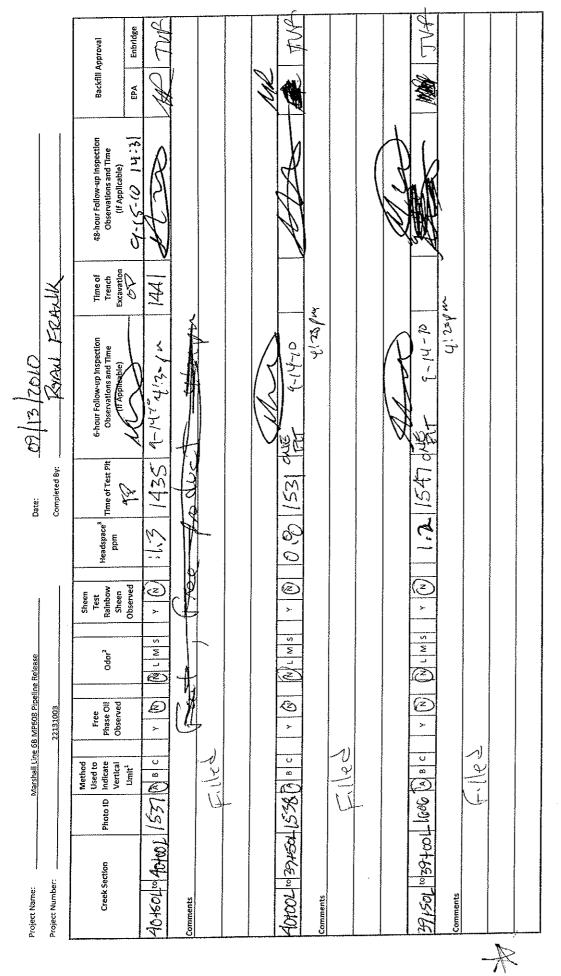
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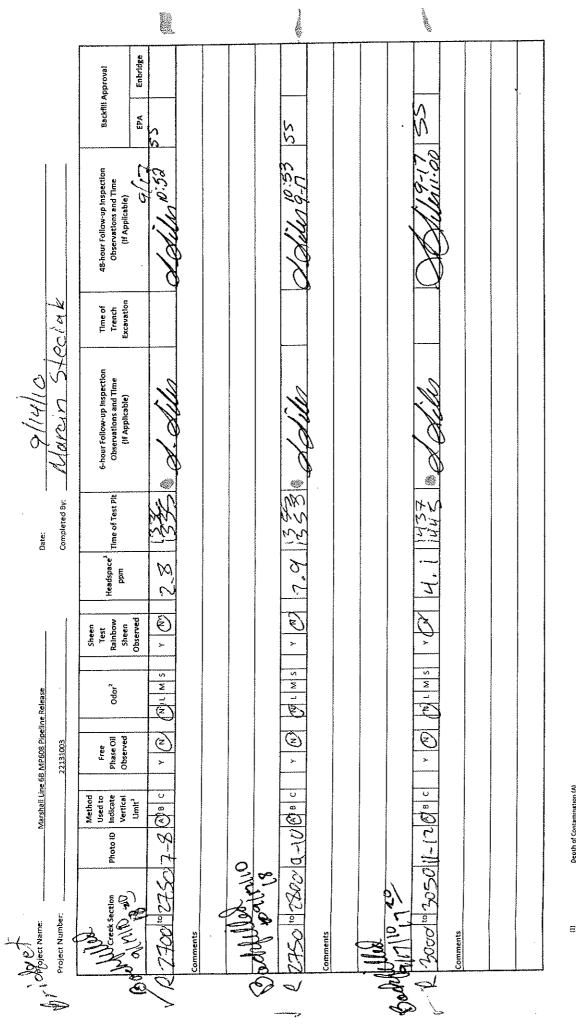
Depth of Contamination (A)

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- Groundwater (B)
 - Confining Layer (C)
- None (N), Light (L), Moderate (M), Strong (S) PID readouts in ppm above background

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ND = No Detection



 (1) Depth of Contamination (A) Groundwater (B) Confining Tayer (C)
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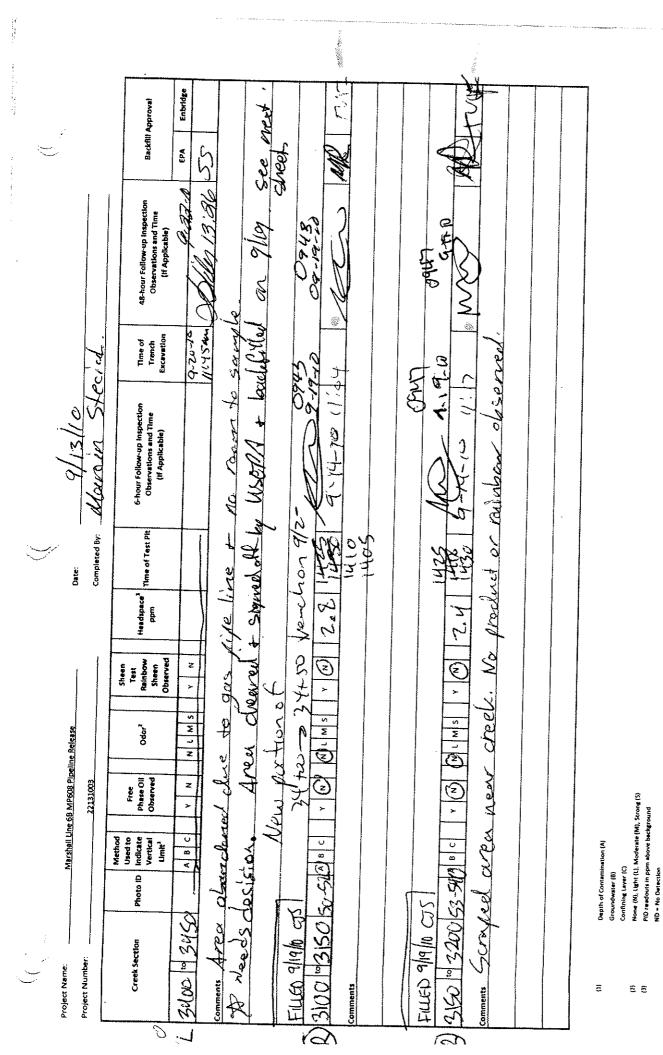
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Depth of Contamination (N) Groundwater (8) Confining Layer (C) None (N), Light (L), Moderate (M), Strong (S) PID readouts in ppm above background ND = No Detection

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Project Name: Project Number:	Creek Section FILLED 9/19/10 CJ		Comments			10		Comments		to		Comments			(1)

- Depth of Contamination (A) Groundwater (B) Confining Layer (C) None (N), Light (L), Moderate (M), Strong (S) PID readouts in ppm above background ND ~ No Detection

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Marshall Line	Method Used to Indicate Vertical Limit ¹		0 8 0			E	A 8		-		A B C			
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Project Name: Project Number:	Creek Section	24250 20000		Comments				Comments		-		Comments		

Depth of Contantnation (A) Groundwater (B) Confining Layer (C) None (N), Light (L), Moderate (M), Strong (S) PID readouts in ppm above background ND = No Detection

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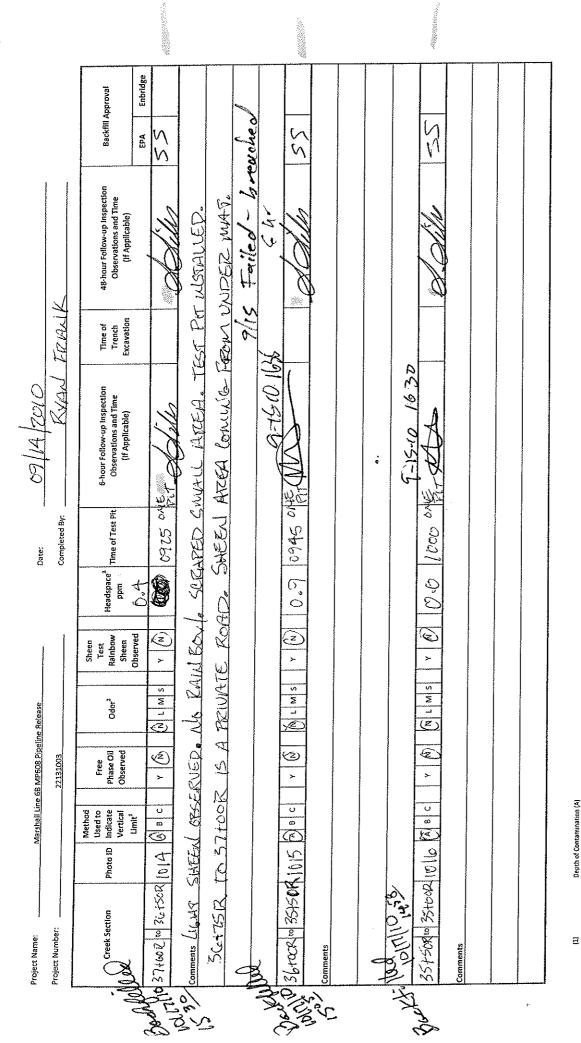
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Groundwater (8) Confining Layer (C) None (N), Light (L), Moderate (M), Strong (S) PID readouts in ppm above background ND = No Detection

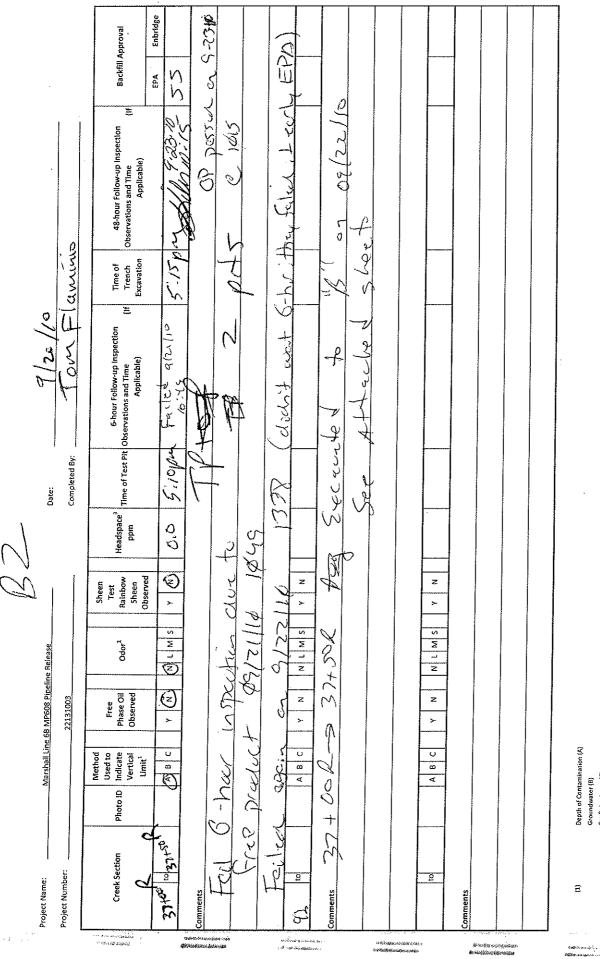
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- Depth of Contamination (A) Confining Layer (C) Groundwater (B)
- None (N), Light (L), Moderate (M), Strong (S)

- PID readouts in ppm above background
- ND = No Detection



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Groundwater (B)

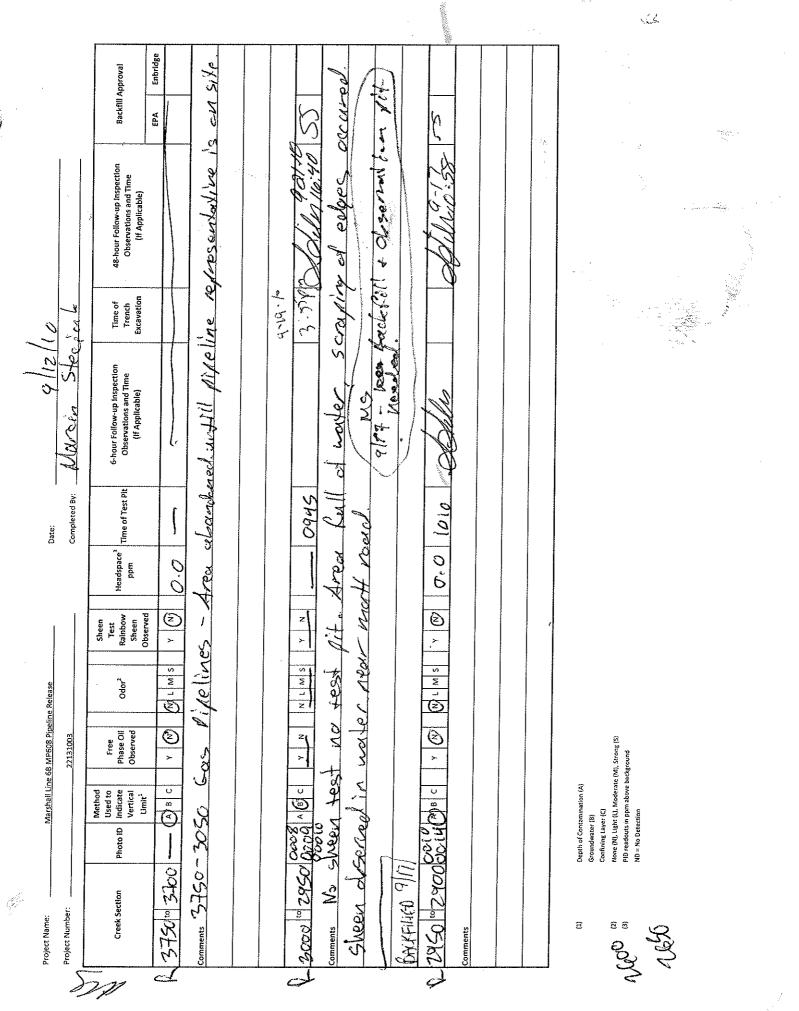
Confining Layer (C)

None (N), Light (L), Moderate (M), Strong (S)

PID readouts in ppm above background

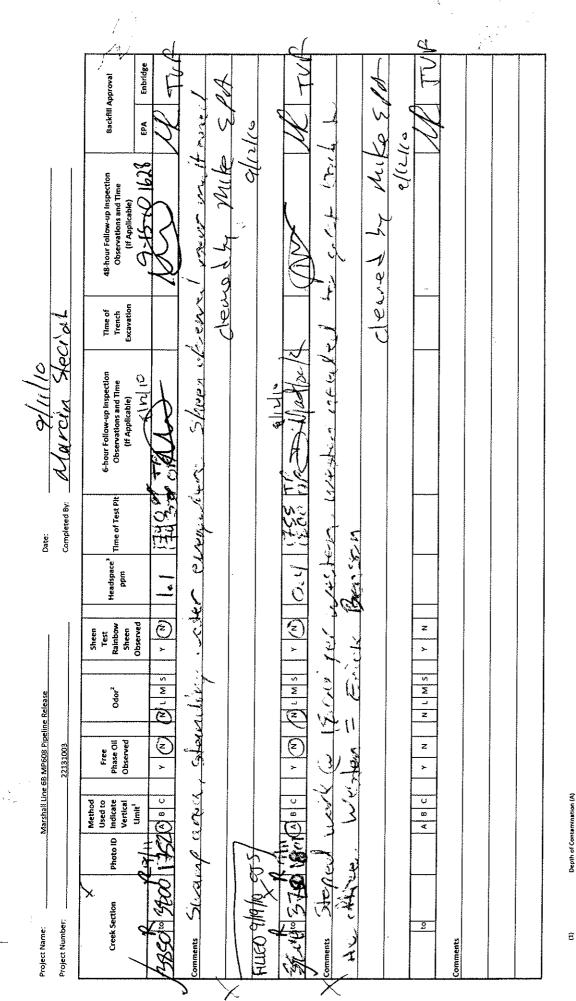
ND = No Detection

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$\frac{1}{25} \frac{1}{3740} \frac{1}{10} \frac{37450}{10} R$	Bactfill Approval EPA Enbridge		To Devent			IM.	01-11-	2/2-2/2		r (original) sleet)	NULLINCE Sheet		
Date: <u>4/22/2010</u> completed By: <u>55</u> (Seve Coust)	th 48-hour Follow-up Impection Observations and Time (II Applicable)		PREPARIAG FOR EXAVITION PARALLEL		Completed (7:30	1-20-10) S' 10/	f	real the st want on	NUKET)	20/10/ 51,15 pur	(~) /0;//2 mm (
	6-bour Follow-up Inspection Observations and Time (f Time of Tranch Applicable)	Fulled glul/10 /0%42	FROM TP		4 1 & TRUCK	installed 9	10, 10;	course to pera		wether pit 9/2	norre alist	1-1	-
Marshall Line 6B. MP608 Pipeline Release 22131003	Free Phase OII Odor ² Sheen Test Needgages ^b Time of Observed Observed Dbarn Test Pit	$ \cdot $ $ \cdot $) Whe TRUCK DRAW WAT	25 EXCAVATION EXCAVATOR LEFT @ 6:50	SECOND HOE ARRIVED BEGAN AGAIN @ 7:00 JENEW CREW INSTALLED FABRIC (P 7:35	Teat M.	F. led	10-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	Part	2579 2579	U-2-1		Depth of Contamination (A) Groundwater (9) Confinite Earth (1) Done (A)L Light (1), Strong (5) PID readouts in ppm above background ND - No Detection
roject Name: roject Number:	Method Nethod Used to Indicate Photo ID Vential	N/A AD		TO ~ 31+25 W.S BEGAN EXCAVATION	T. OS SECOND H								 (1) Depin of Contaminator (9) Groundwater (9) Groundwater (9) Confinite Expert (1) (2) None (4), LDFH (1), LDFH (1) (3) PID resident In part (1)

11 A. A.



- Groundwater (B)
- Confining Layer (C)
- None (N), Ught (L), Moderate (M), Strong (S)

- PID readouts in ppm above background
- ND = No Detection

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