



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

May 29, 2013

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

**Re: Acknowledgement of Enbridge Energy, Limited Partnership's May 13, 2013 submittal in response to the requirements of the Administrative Order issued by U.S. EPA on March 14, 2013, pursuant to §311(c) of the Clean Water Act (Docket No. CWA 1321-5-13-001)**

Dear Mr. Adams:

The United States Environmental Protection Agency ("U.S. EPA") acknowledges receipt of the following document submitted by Enbridge Energy, Limited Partnership ("Enbridge") on May 13, 2013:

*Enbridge Line 6B MP 608, Marshall, MI Pipeline Release, 2013 Submerged Oil Removal and Assessment Work Plan, Prepared for the United States Environmental Protection Agency, Enbridge Energy, Limited Partnership, May 13, 2013*

The **2013 Submerged Oil Removal and Assessment Work Plan** ("Work Plan") submitted by Enbridge on May 13, 2013 also included a comment log in which Enbridge addressed each of the modifications required by U.S. EPA in its May 8, 2013 approval with modifications letter.

The Work Plan submitted by Enbridge on May 13, 2013 did not incorporate all of the modifications required by U.S. EPA's May 8, 2013 letter. Of specific note, U.S. EPA's modification #10 required Enbridge to collect vertical datum during submerged oil poling assessment events, but Enbridge did not make this modification.

U.S. EPA and Enbridge have subsequently resolved this issue. This resolution is included within the attached Revised Poling Standard Operating Procedure (Attachment 1), and is hereby acknowledged and accepted by 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 "R. Dollhopf". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

Attachment

cc: K. Peaceman, U.S. EPA, ORC  
C. Mikalian, U.S. EPA, ORC  
S. McAnaney, U.S. EPA, ORC  
J. Kimble, U.S. EPA, OSC  
M. DeLong, MDEQ  
Records Center, U.S. EPA, Reg. 5

Approval Pending

**Enbridge Line 6B MP 608  
Marshall, MI Pipeline Release  
Sediment Poling Standard Operating Procedure**

**Prepared for the United States Environmental Protection Agency**

**Enbridge Energy, Limited Partnership**

**Originally Submitted: May 11, 2012**

**Resubmitted: May 22, 2013**

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**FIGURE**

**Figure 1      Submerged Oil Field Observation Flowchart**

**LIST OF ACRONYMS**

GPS	Global Positioning System
HASP	Health and Safety Plan
QC	Quality Control
SOP	Standard Operating Procedure

## 1.0 SCOPE AND METHOD SUMMARY

This Standard Operating Procedure (SOP) describes the basic techniques and general considerations to be followed for conducting poling of sediments. For the purposes of this SOP, sediment is defined as soil, sand, silt, clay, organic matter, or other materials that accumulate on the bottom of a water body (U.S. EPA, 1998). The specific details of poling locations are dependent upon local conditions as well as the purpose of the poling.

Poling generally involves the measurement of sediment and water characteristics using specialized tooling designed for the task. Specific field conditions such as location, water depth and temperature, sediment thickness and temperature, and a qualitative determination of oil sheen and globule coverage over a specified surface area are recorded.

It is expected that the procedures outlined in this SOP will be followed. Procedural modifications may be warranted depending on field conditions, equipment limitations, or limitations imposed by the procedure. Substantive modification to this SOP will be noted in task-specific work plans or on Field Modification Forms, as appropriate, and will be approved in advance by the Task Manager. Deviations from the SOP will be documented in the project records and in subsequent reports.

## 2.0 PERSONNEL QUALIFICATIONS

Poling is a relatively involved procedure requiring training and a variety of equipment. It is recommended that initial poling be supervised by more experienced personnel.

Field personnel must be health and safety certified as specified by the *Occupational Safety and Health Administration* (OSHA, 29 CFR 1910.120(e)(3)(i)) to work on sites where hazardous materials may be present.

It is the responsibility of the field personnel to be familiar with the procedures outlined within this SOP, with site specific procedures, the *Health and Safety Plan* (HASP) (Enbridge, 2013), and work plans under which the work will be conducted. Field personnel are responsible for data collection, decontamination of equipment, and proper documentation in the field logbook, field forms, and/or a Global Positioning System (GPS) data collector such as the Leica<sup>®</sup>, Trimble Yuma<sup>®</sup>, or equivalent (as appropriate).

### **3.0 HEALTH AND SAFETY**

The health and safety considerations for the work associated with this SOP, including both potential physical and chemical hazards, are addressed in the site specific HASP. All work will be conducted in accordance with the HASP.

### **4.0 INTERFERENCES**

Potential interferences could result from cross contamination between poling locations. Minimization of potential cross contamination will occur through the following:

- Avoidance of material (e.g., suspended sediment) that is not representative of the medium to be evaluated (this will be accomplished by performing poling in a downstream to upstream approach within a focus area).

### **5.0 EQUIPMENT AND SUPPLIES**

The following equipment list contains materials which may be required to complete the procedures contained in this SOP. Not all equipment listed below may be necessary for a specific activity. Additional equipment may be required, pending field conditions or as specified in a work plan.

- Depth of water measurement/agitation pole (aluminum pole with a 8-inch diameter disk attached to one end),
- Sediment measuring pole (aluminum pole without a disk attached),
- Equipment decontamination supplies,
- Health and safety supplies (gloves, personal flotation devices, etc., as required by the HASP),
- Waterproof marker pens (Sharpie® or similar),
- GPS data collector,
- Field logbook,
- Digital camera, and
- Access to a boat when required for transportation.

## 6.0 METHODS

### 6.1 Poling Procedures

Water depth data shall be collected using a 8-inch diameter disk attached to the end of an aluminum pole approximately 2 inches in diameter marked at 0.1-foot intervals. At each poling location, the disc shall gradually be lowered to the top of the sediment bed, and the depth from the water surface to the top of soft sediment (water depth) shall be recorded to the nearest 0.1-foot.

Soft sediment thickness data shall be measured using a pole without a disk and marked at intervals of 0.1-foot. The pole shall be pushed vertically through the sediment until advancement is restricted. The difference between the depth to sediment surface (water depth) and maximum poling depth into the soft sediment shall determine the soft sediment thickness at each location. A description of the general sediment type shall be documented based on the poling results (e.g., soft sediment – silt over sand). An experienced poler can distinguish the difference between soft sediment, sand, and gravel by the feel of the sediment and the sound from the pole.

An approximate determination of the relative amount of oil/sheen created by sediment agitation at each poling location shall be made by using the pole with a 8-inch diameter disk to agitate the soft sediment. After agitation, the amount of oil/sheen observed at the water surface, within a square yard area, shall be described using the same categories as the 2011 field season (heavy, moderate, light, or none). These categories are outlined in the attached *Submerged Oil Field Observation Flow Chart (Figure 1)*. If 'moderate' or 'heavy' submerged oil sheen/globules are observed, the area shall be delineated with additional poling. The poling teams shall work away from the 'moderate' or 'heavy' location until they have poled either a 'light' submerged oil classification, or no ('none') submerged oil.

All poling activities shall be conducted while the measured temperature of both sediment and water is above 60° F. As such, sediment and water temperature data shall be collected during poling activities as thresholds for data reliability are approached.



## 6.2 Access to Poling Locations

Poling locations are presented in each specific work plan. A boat will be needed to pole most locations on ponds and the river. When boats are used for poling, health and safety procedures as described in the HASP must be followed. Wading to locations in the Kalamazoo River may be considered, but is not the preferred method. If it is necessary to wade into the water body to perform the work, the worker shall take care to minimize disturbance of bottom sediments and must enter the water body downstream of the poling location.

## 6.3 Poling Location

Poling locations will be identified with a GPS data collector as discussed in *SOP EN-104 – Survey* (Enbridge, 2011a). All poling locations shall be surveyed during the project to the extent practicable using a differential GPS data collector with sub-meter accuracy. Quality Control (QC) checks on all GPS data collectors will be performed at a predetermined monument prior to daily field work and at the end of each day. The QC points and the type of GPS data collector will be documented within field notes. Daily QC checks will be conducted in the following process:

- Each team will collect a morning QC survey location at the designated monument prior to field work. Each poling point will be occupied for a similar amount of time as the morning and evening QC survey location was occupied.
- If the GPS data collector is outside of the sub-meter range it will not be used, another GPS data collector will be used.
- The new GPS data collector will also be put through the morning QC survey.
- At the end of each day the teams will return to the same monument to collect an end of day QC survey location at the monument. If the end of day QC point is outside the tolerance of the GPS data collector, then the data collected during the day will be checked for accuracy during post processing.
- At any point throughout the working day if a GPS data collector seems to be working incorrectly and not collecting appropriate GPS locations as seen on the GPS data collector, data collection will cease, and troubleshooting the GPS data collector with Enbridge GIS personnel will be performed until a solution or another GPS data collector is recommended to be used. Note that this could occur sometimes due to minimal satellites coverage at that time. If loss of power to a GPS data collector occurs or a GPS data collector seems to be working incorrectly, all previously collected data remains in

the internal memory of the GPS data collector and can be retrieved from the internal hard drive. Any data retrieved from a unit that lost power and was not able to collect an end of day QC point will be post processed for accuracy.

Pre-determined GPS identification numbers and coordinates will be used to determine the correct poling placement whenever possible. The poling location must be maintained while poling from boats. The use of anchors and other stabilizing devices may be required to maintain a consistent poling location.

The horizontal coordinate system shall be the Michigan State Plane Coordinate System, South zone, referenced to the North American Datum (“NAD”) 83, in international feet and the vertical coordinate system shall be North American Vertical Datum (NAVD) 88.

#### **6.4 Equipment Decontamination**

Reusable equipment shall be decontaminated in accordance with *SOP EN-105 Decontamination of Field Equipment* (Enbridge, 2011a). Investigation derived waste generated from the effort (gloves, disposable sampling equipment, decontamination water, etc.) shall be appropriately containerized and transported to the onsite collection area for appropriate disposal per *SOP EN-106 Investigation Derived Waste Management* (Enbridge, 2011a).

### **7.0 DATA AND RECORDS MANAGEMENT**

The data associated with poling locations may be contained in the following:

- Field logbook,
- Sample collection records,
- GPS data collector (Leica<sup>®</sup>, Trimble Yuma<sup>®</sup>, or equivalent),
- Field Modification Forms (used prior to field work, when required), and
- Nonconformance Records (used after field work, when required).

The following SOPs describe the data collection and record management procedures that should be followed as part of the sediment sample collection process:

- *SOP EN-101 Field Records* (Enbridge, 2011a),
- *SOP EN-104 Survey* (Enbridge, 2011a),

- *SOP EN-105 Decontamination of Field Equipment* (Enbridge, 2011a), and
- *SOP EN-106 Investigative Derived Waste Management* (Enbridge, 2011a).

## 8.0 REFERENCES

Enbridge, 2011a. Enbridge Line 6B MP 608 Pipeline Release; Marshall, Michigan; *SOP EN-101 –Field Records; SOP EN-104–Survey; SOP EN-105– Decontamination of Field Equipment; SOP EN-106 – Investigation Derived Waste Management.*

Enbridge, 2013. Enbridge Line 6B MP 608 Pipeline Release; Marshall, Michigan; *Health and Safety Plan* (HASP). v. 7.0. April 30, 2013.

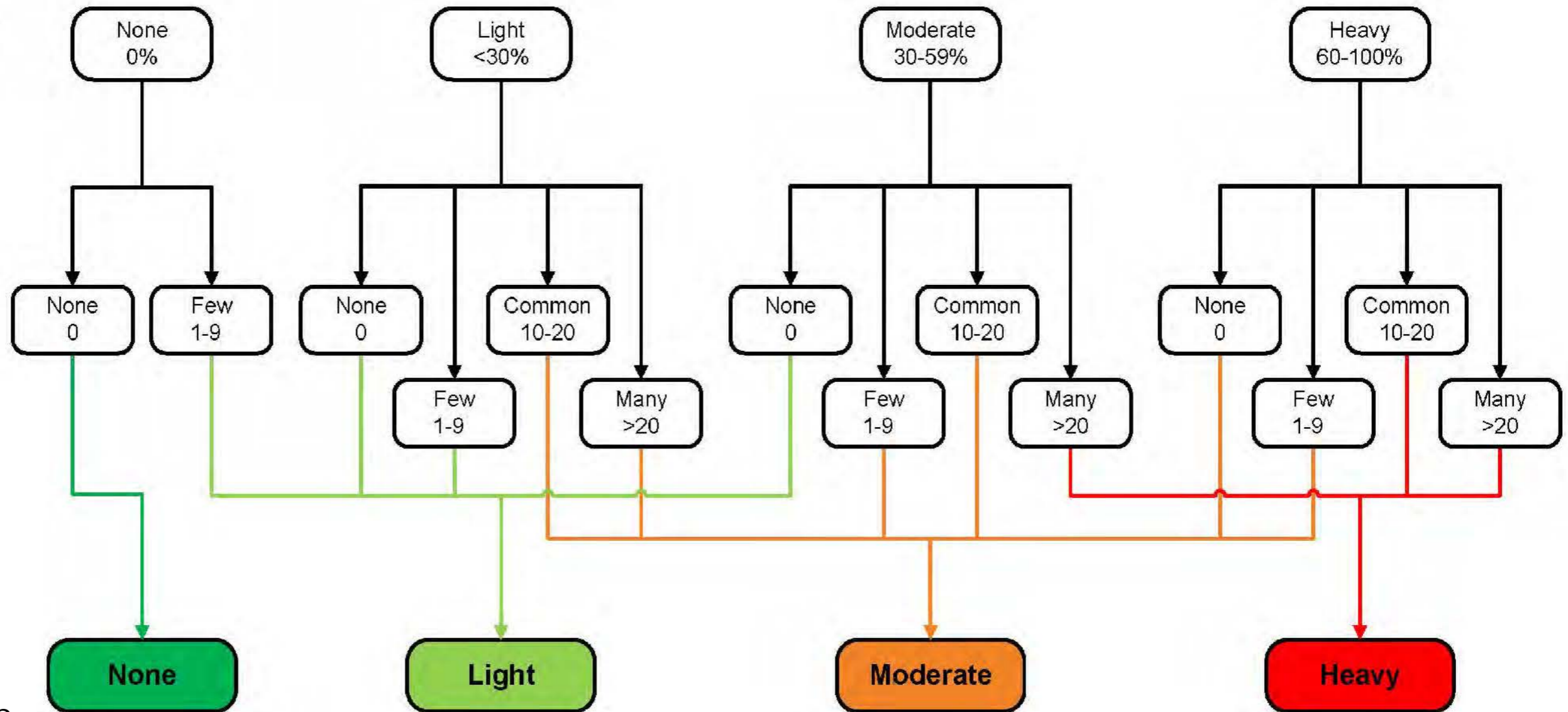
*U.S. EPA. 1998. EPA’s Contaminated Sediment Management Strategy. U.S. Environmental Protection Agency, Office of Water, Washington, DC. EPA 823/R-98/001.*

**Figure**

**Percent Sheen Coverage<sup>1</sup>**

**Number of Globules<sup>2</sup>**

**Poling Classification**



Notes:  
1. Percent coverage per square yard  
2. Number of globules per square yard



Drawn: CW  
Approved: EE  
Project#: 60284509

FIGURE 1  
SUBMERGED OIL FIELD OBSERVATION  
FLOWCHART

ENBRIDGE LINE 6B MP 608  
MARSHALL, MI PIPELINE RELEASE  
ENBRIDGE ENERGY,  
LIMITED PARTNERSHIP