



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

April 11, 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: U.S. EPA Notice of Approval, with Modifications, of an Enbridge Energy, Limited Partnership March 2, 2012 submittal in response to the Administrative Order issued by U.S. EPA on July 27, 2010, pursuant to §311(c) of the Clean Water Act (Docket No. CWA 1321-5-10-001) and Supplement to the Administrative Order issued by U.S. EPA on September 23, 2010.**

Dear Mr. Adams:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the following document submitted by Enbridge Energy, Limited Partnership, Enbridge Pipelines (Lakehead) L.L.C., Enbridge Pipelines (Wisconsin), and Enbridge Energy Partners, L.P. (herein collectively referred to as "Enbridge") on March 2, 2012:

*Enbridge Line 6B MP 608, Marshall, MI Pipeline Release, Report of Findings for Background Sediment Concentrations, Investigation for Upstream Sample Areas, Prepared for United States Environmental Protection Agency, Enbridge Energy, Limited Partnership, Submitted: November 11, 2011, Resubmitted: January 9, 2012, Resubmitted: March 2, 2012*

Pursuant to Paragraph 18 of the July 27, 2010 Order, U.S. EPA approves, with modifications, Enbridge's above-referenced *Report of Findings for Background Sediment Concentrations, Investigation for Upstream Sample Areas*. Enbridge shall incorporate the comments below into a revised report of findings.

1. Enbridge response to comment 5.c(i): Please add the following to Section 2.3, between items 2 and 3 on page 8:

“The Kaplan-Meier mean and standard deviation were calculated for data groups which had between 15% and 80% non-detect values and statistical distribution of the data was not found to be normal or log-normal in distribution tests as estimated by ProUCL Version 4.1. For a derivation of the Kaplan-Meier method used in ProUCL Version 4.1, the reader is referred to the ProUCL Version 4.1 Technical User Guide (p. 143). The Kaplan-Meier method in ProUCL Version 4.1

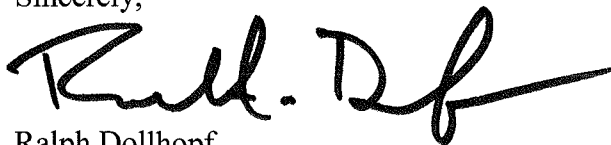
takes non-detected values and multiple detection limits into account in estimating the Kaplan-Meier mean and standard deviation."

2. Section 3.3.1, Page 15: It is stated that "...the sample size for Upstream Talmadge Creek became too small (n=2) for molybdenum to compare medians." However, median concentrations for molybdenum (with n=2) were then subsequently compared in various soil types in the Upstream Talmadge Creek Area.
  - a. Please revise the data interpretation and text so that comparisons are made with data sets that include at least four values (i.e.,  $n \geq 4$ ).
  - b. Please provide additional discussion of uncertainty on the basis of Quality Control (QC) samples.
3. Section 3.3.2:
  - a. Benzo (a) pyrene bullet and throughout section: By replacing "significantly" with "notably different," the differences between the compared groups and the hypothesis test result appear to be undermined. When the test conclusion is "fail to reject  $H_0$ " it means that the data set provides insufficient evidence to conclude the groups are different and the text should reflect this conclusion. Please replace "notably different" with "significantly" in Section 3.3.2 and throughout as necessary.
  - b. Page 17, First sentence of first full paragraph: Please replace "PNAs" with "benzo (a) pyrene."

Five copies of the revised report, as modified, shall be submitted to U.S. EPA no later than 17:00 hours Eastern, April 25, 2012. The document shall also be concurrently submitted electronically in Microsoft Word format for the text and in Microsoft Excel for spreadsheet/graphs/tables.

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

Sincerely,



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

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