



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

June 17, 2011

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

Re: Conditional Approval of Enbridge Energy, Limited Partnership's June 15, 2011 submittal in response to a U.S. EPA Directive to Prepare an Air Monitoring and Sampling Plan, in response to the Administrative Order issued by U.S. EPA on July 27, 2010 and Supplement to the Administrative Order issued by U.S. EPA on September 23, 2010, pursuant to §311(c) of the Clean Water Act (Docket No. CWA 1321-5-10-001).

Dear Mr. Adams:

On June 2, 2011 I issued a verbal directive to 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") to prepare a work plan addendum for the performance of 2011 air monitoring and sampling. This directive was issued pursuant to the Administrative Order ("Order") issued by the U.S. EPA on July 27, 2010 and a Supplement to Order for Compliance Under Section 311(c) of the Clean Water Act issued ("Supplement") by the U.S. EPA on September 23, 2010.

Pursuant to Paragraph 18 of the Order and Paragraph 6 of the Supplement, U.S. EPA required Enbridge to submit a detailed work plan ("Plan") to supplement the Sampling and Analysis Plan (SAP) previously approved by the U.S. EPA.

U.S. EPA has completed its review of the following document submitted by Enbridge on June 15, 2011:

Enbridge Line 6B MP 608, Marshall, MI Pipeline Release, 2011 Air Monitoring and Sampling Addendum to the Sampling and, Analysis Plan Prepared for United States Environmental Protection Agency, Enbridge Energy, Limited Partnership, Submitted: June 15, 2011

Pursuant to Paragraph 18 of the Order and Paragraph 6 of the Supplement, U.S. EPA approves Enbridge's above-referenced Plan with the modifications set forth below:

1. Please include the detection limit of the specified Gastec tube and report to the lowest detection limit prescribed by the manufacturer.

2. The plastic bag specified for collecting headspace analysis of tar patties may have sufficient permeability to potentially skew analyses. Therefore, please provide alternate collection vessels (i.e., Mylar bags, glassware) for headspace analysis.
3. Please add a requirement for the analytical laboratory to flag (i.e., “B”) analytical results for all contaminants where the contaminant was also detected in the laboratory blanks.
4. In addition to the worker protection standards cited in the Plan, please include reference to appropriate worker protection standards, if any, prescribed by Michigan Occupational Safety and Health Administration (MIOSHA).
5. Regarding worker protection standards, please confirm that Short Term Exposure Levels (STEL) will also be considered when evaluating monitoring results for worker protection.
6. Section 2.0: remove “below” from the fourth sentence of the first paragraph.
7. Section 3.0:
 - a. Precipitation gauges are not referenced in the text or in Appendix C. Please state that precipitation gauges will be included in the WeatherPak stations and provide specifications for the precipitation gauge.
 - b. Section 3.0: The meteorological station clocks (or SAFER computer, if it assigns the 5-minute data timestamps) shall be maintained in reference to a National Institute of Standards and Technology (NIST) clock source.
8. Section 4.0: Please change “Table 2” to “Table 1” in the text and table title.
9. Section 4.0, third sentence of the fourth paragraph: Please change the reference from “Table 1” to “Attachment A.”
10. Section 5.2:
 - a. Please state that air monitoring using MultiRAE and UltraRAE/Gastec Pumps will also be performed in tar patty recovery work zones.
 - b. Please replace reference from “Table 2” to “Table 1.”
11. Section 6.0:
 - a. Last sentence of second full paragraph: Please replace “VOCs” with “COPCs”. Compound-specific TWAs shall be calculated for benzene, toluene, ethylbenzene and xylenes (collectively as BTEX) compounds and n-Hexane using the TWA total volatile organic compound (VOC) result, and compound-specific instrument response factors versus isobutylene.

- b. Third full paragraph: please add the following sentence to the end of the paragraph: “Table 2 summarizes the analytical detection levels for the OVM badges.”
- c. Please relabel existing Table 3 as “Table 2 OVM Badge Limits of Detection for COPCs.”

12. Section 7.0:

- a. Please replace the reference to “Table 1” with “Attachment A.”
- b. Please replace “filed visit” with “field visit.”

13. Section 8.0: Please replace the reference to “Table 1” with “Attachment A.”

14. Section 9.0:

- a. Please specify the frequency of collection for collocated duplicate and blank samples.
- b. Please add analysis of a trip blank at least once per week.

15. Section 10.0

- a. In addition to sample locations where compounds are detected, please add sample locations to maps indicating where non-detectable samples were collected.
- b. Please add the following statement:
“The daily report package will also contain tabular summaries of hourly meteorological data.”
This shall be a set of tables that show air monitoring parameters for each day (by hour), as recorded from each portable weather and NWS station. The summaries shall also include a daily average for each parameter.

16. Attachment A: Please include a table showing a complete list of all compounds being reported by the lab for TO-15, including their respective LOQs.

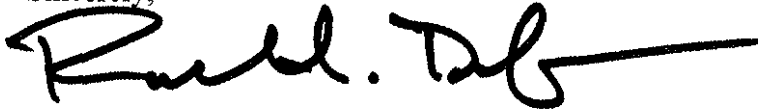
17. Attachment D: Please rename this attachment to “Field Standard Operating Procedures,” and modify the table of contents and title pages accordingly.

18. CTEH SOP for MultiRAE Worker Exposure Monitoring: Please add a post-sampling interview (such as that used in the OVM Badge Sampling SOP) with the worker for assessing cross-contamination.

The final work plan shall be submitted to U.S. EPA no later than 1700 EST on June 18, 2011. Please submit an electronic copy of the original and final plan in Microsoft Word format concurrent with the hard copy.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Dollhopf". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

cc: L. Kirby-Miles, U.S. EPA, ORC
J. Cahn, U.S. EPA, ORC
J. Kimble, U.S. EPA, Dep. IC, FOSC
M. Durno, U.S. EPA, Dep. IC, Section Chief
T. Edwards, U.S. EPA, OSC
S. Wolfe, US. EPA, OSC
M. Ducharme, MDEQ
L. Dykema, MDCH
Records Center, U.S. EPA, Reg. V