



Request for DEQ Review of No Further Action (NFA) Report

This form is required for submittal of a request for the DEQ to review a No Further Action Report, under Section 20114d, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Section A: NFA Category (Check all that apply:)

Residential	<input checked="" type="checkbox"/>	Unrestricted	<input checked="" type="checkbox"/>
Non-Residential	<input type="checkbox"/>	Restricted	<input type="checkbox"/>
20b(3) Site Specific or Surrogate (no generic criteria available)	<input type="checkbox"/>	20b(2) Site Specific (modification of generic criteria)	<input type="checkbox"/>

The NFA addresses the entire facility
 (entire facility as defined by Part 201, all releases, hazardous substances, and environmental media):

The NFA does not address the entire facility
 Please specify the release(s), hazardous substance(s), environmental media, and/or portions of the facility addressed by the NFA.

This NFA seeks an unrestricted residential closure for Segment 3 of the Spill Area (Michigan Department of Environmental Quality (MDEQ) Facility ID 13000397 - Enbridge Spill – Talmadge Ck – Kalamazoo Riv) associated with hazardous substances in Reach 3 released during the Enbridge Energy, Limited Partnership crude oil release from the Lakehead System Line 6B pipeline on July 25 and July 26, 2010, near Marshall, Michigan. Hazardous substances associated with the Line 6B crude oil release have been characterized through laboratory analysis of metals, polynuclear aromatic hydrocarbons, and volatile organic compounds. The environmental media addressed in this NFA include soil, sediment, groundwater and surface water. Please refer to the attached Segment 3 NFA Report dated November 6, 2015, for additional details.

NFA relies on a De minimus determination of GSI impact pursuant to Section 20120e(14):

Section B: Facility Information:

Facility Name: Segment 3 of the Enbridge Spill – Talmadge Ck – Kalamazoo Riv	County: Calhoun
Street Address of Property: Segment 3 (Reach 3) consists of seven parcels; please refer to Figure 1 in the attached Segment 3 NFA Report.	City/Village/Township: Marshall Township Town: 2 South Range: 6 West Section: 35
City: Marshall State: Michigan Zip: 49056	Quarter: SW Quarter-Quarter: SW - SW
Property Tax ID (include all applicable IDs addressed by the NFA)	Decimal Degrees Latitude: 42.249469 Decimal Degrees Longitude: -84.980849
Please refer to the attached Segment 3 NFA Report for a figure (Figure 1) that depicts a graphical representation of Segment 3 (Reach 3) and Attachment A, which includes legal descriptions for each of the seven parcels including the property tax ID numbers.	Reference point for latitude and longitude:
Status of submitter relative to the property (check all that apply):	Center of site <input checked="" type="checkbox"/> Main/front door <input type="checkbox"/>
Former Current Prospective	Front gate/main entrance <input type="checkbox"/> Other <input type="checkbox"/>
Owner <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Collection method:
Operator <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Survey <input type="checkbox"/> GPS <input type="checkbox"/> Interpolation <input checked="" type="checkbox"/>

Section C: Submitter Information:

Entity/person requesting review: Enbridge Energy, Limited Partnership
 Contact Person (name and title): Bryan Stiemsma, Supervisor, LP US Env Michigan Remediation
 Submitter's Address: 333 South Kalamazoo Avenue
 City: Marshall State: Michigan Zip: 49068
 Telephone: 269-781-1195 E-Mail: Bryan.Stiemsma@Enbridge.com
 Relationship of Contact Person to the Submitter: Employee
 Owner Name, if different from Submitter: Same Company:
 Owner Address: City: State: Zip:
 Telephone: E-Mail:

Section D: Facility/Property Subject to (Check all that apply):

- Facility regulated under Part 201, source other than listed below or source unknown
- Part 201 Site ID, if known: 13000397 - Enbridge Spill – Talmadge Ck – Kalamazoo Riv
- Leaking Underground Storage Tank regulated pursuant to Part 213.
- Part 211/213 Facility ID, if known:
- Oil or gas production and development regulated pursuant to Part 615 or 625
- Licensed landfill regulated pursuant to Part 115
- Licensed hazardous waste treatment, storage, or disposal facility regulated pursuant to Part 111
- Consent Agreement or other legal agreement with the MDEQ

Section E: Are/were the following present at the facility (Check all that apply):

	Current	Previously	Unknown
Mobil or migrating non aqueous phase liquids (NAPL)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Soil contamination above residential criteria	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Soil contamination above non-residential criteria	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Soil aesthetic impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Groundwater contamination above residential criteria	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater contamination above non-residential criteria	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater aesthetic impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soil Gas contamination above residential vapor intrusion (VI) screening levels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soil Gas contamination above non-residential VI screening levels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conditions immediately dangerous to life or health (IDLH)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fire & Explosion hazards related to releases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contamination existing in drinking water supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Imminent threat to drinking water supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Impact to surface water	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Impact to surface water sediments above screening levels	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Section F: The following questions assist MDEQ in evaluating the No Further Action Report:

Have other plans or reports, BEAs, DDCCs, NFAs, etc. been submitted for this facility?

Facility Name, if different than this submittal:

Date and Name of most recent submittal: October 30, 2014, Remedial Investigation Report for Reach 3

Response Activities or Remedial Action that have been Implemented (Check all that apply):

	Current	Previously
Excavation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Physical or Engineered Exposure Barrier	<input type="checkbox"/>	<input type="checkbox"/>
Active Soil Remediation System	<input type="checkbox"/>	<input type="checkbox"/>
In-situ Soil Remediation	<input type="checkbox"/>	<input type="checkbox"/>
Active Groundwater Remediation System	<input type="checkbox"/>	<input type="checkbox"/>
In-situ Groundwater Remediation	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater Monitored Natural Attenuation	<input type="checkbox"/>	<input type="checkbox"/>
Containment, Physical or Hydraulic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vapor Intrusion Barrier	<input type="checkbox"/>	<input type="checkbox"/>
Vapor Intrusion Remediation System	<input type="checkbox"/>	<input type="checkbox"/>
Other, Specify:		

Remedial Action Relies on (Check all that apply):

Mixing Zone	<input type="checkbox"/>
Part 201 Section 20118(4) and (5)	<input type="checkbox"/>
MIOSHA demonstration (Section 20120a(18))	<input type="checkbox"/>
Restrictive Covenant	<input type="checkbox"/>
Institutional Control (Section 20121(8))	<input type="checkbox"/>
Alternative Instruments (Section 20121(9))	<input type="checkbox"/>

Post Closure Plan and Components:

Post Closure Plan Required? Yes No (Residential, Unrestricted Category Only)

Plan Includes:

- Permanent Markers
 Restrictive Covenant
 Other Institutional Controls

Post Closure Agreement and Components:

Post Closure Agreement Required? Yes No

Agreement Includes:

- FAM
 FAM, de minimus
 Waiver of Permanent Marker

Section G: Attachments (Required):

	Yes
Environmental Professional's Affidavit is attached:	<input checked="" type="checkbox"/>
Environmental Professional's Certificate of Insurance is attached:	<input checked="" type="checkbox"/>
Submitter's Affidavit is attached:	<input checked="" type="checkbox"/>

Section H: Environmental Professional Signature:

With my signature below, I certify that this report and all related materials are true, accurate, and complete to the best of my knowledge and belief.

Signature:  Date: 11/5/15

Printed Name: David Dryburgh

Company: AECOM

Mailing Address: 3950 Sparks Drive SE City: Grand Rapids State: Michigan Zip: 49546

Telephone: 616-574-8427

E-mail: David.Dryburgh@aecom.com

Section I: Submitter Signature:

With my signature below, I certify that this report and all related materials are true, accurate, and complete to the best of my knowledge and belief and I am legally authorized to sign for the submitter.

Signature:  Date: 11-5-2015

(Person legally authorized to bind the legal entity)

Printed Name: Bryan Stiemsma

Title and Relationship of signatory to submitter: Supervisor, LP US Env Michigan Remediation, employee

Address: 333 South Kalamazoo Avenue

City: Marshall

State: Michigan Zip: 49068

Telephone: 269-781-1195

E-Mail: Bryan.Stiemsma@enbridge.com

This form and the No Further Action Report should be submitted to the DEQ Remediation and Redevelopment Division District Office unless the response activity is related to a facility that is regulated by another DEQ Division. A district map is located at www.michigan.gov/deqrrd. If regulated by another division, contact should be made with that division for information on where to submit the form and report.

Affidavit of Person Submitting a No Further Action Report

Required pursuant to Section 20114d(5) of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, to be submitted by a person submitting a No Further Action (NFA) report to Michigan DEQ. All terms found in this document which are defined in Part 3, Definitions, and Part 201, Environmental Remediation, of NREPA shall have the same meaning as in the statute.

State of Michigan

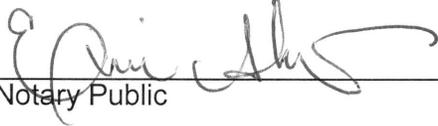
County of Calhoun

1. I, Bryan Stiemsma, in my capacity as an Enbridge Liquids Pipelines Supervisor of Michigan Environmental Remediation, am authorized to submit this affidavit on behalf of Enbridge Energy, Limited Partnership (Enbridge) under MCL 324.20114d(5).
2. A No Further Action (NFA) report dated November 6, 2015 is being submitted for the facility referred to as Segment 3 of the Enbridge Spill – Talmadge Creek – Kalamazoo Riv (Reach 3) located in Section 35, Town 2 South, Range 6 West. Reach 3 is comprised of seven separate parcels. Please refer to the attached Reach 3 NFA Report for a figure (Figure 1) that depicts a graphical representation of Reach 3 and Table 1, which includes the tax ID number (the “Facility”) and land use/zoning for each parcel. Legal descriptions for each of the seven parcels are included as part of Attachment A.
3. The purpose of the NFA report is to detail the completion of remedial action at the Facility.
4. The remedial action at the Facility described in the NFA report was conducted in compliance with all applicable local, state, and federal laws and regulations.
5. I affirm to the best of my knowledge and belief that the NFA report prepared for this Facility, and all information, data, documents and reports relied upon for this NFA report, are true, accurate and complete.



Signature of Affiant

Sworn to before me and subscribed in my presence this 5th day of November, 2015.



Notary Public

ERICA ASKEW
NOTARY PUBLIC, STATE OF MI
COUNTY OF CALHOUN
MY COMMISSION EXPIRES Aug 10, 2017
ACTING IN COUNTY OF Calhoun

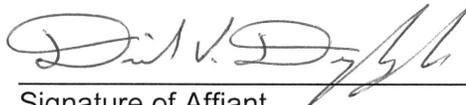
Environmental Consultant Affidavit for No Further Action Report

Required pursuant to Section 20114d(5) of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, for the Environmental Consultant who prepared a No Further Action (NFA) report that is being submitted to Michigan DEQ. All terms found in this document which are defined in Part 3, Definitions, and Part 201, Environmental Remediation, of NREPA shall have the same meaning as in the statute.

State of Michigan

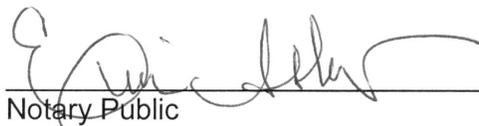
County of Calhoun

1. I, David Dryburgh, am an Environmental Consultant whose title is Project Manager, and I am employed by AECOM.
2. I meet the professional qualifications set forth in MCL 324.20114e(2) of NREPA. A description of my qualifications, including education and work experience, is attached.
3. I have prepared a No Further Action (NFA) report dated November 6, 2015 for the facility referred to as Segment 3 of the Enbridge Spill – Talmadge Creek – Kalamazoo Riv (Reach 3) and located at in Section 35, Town 2 South, Range 6 West. Please refer to the attached Reach 3 NFA Report for a figure (Figure 1) that depicts a graphical representation of Reach 3 and Table 1, which includes the tax ID number (the "Facility") and land use/zoning for each parcel. Legal descriptions for each of the seven parcels are included as part of Attachment A. I am submitting this affidavit pursuant to MCL 324.20114d(5).
4. I prepared the NFA Report at the request of Enbridge Energy, Limited Partnership with an office located at 333 South Kalamazoo Avenue, Marshall, Michigan 49068.
5. The remedial action at the Facility described in the NFA report was conducted in compliance with Part 201 of NREPA, and all other applicable local, state, and federal laws and regulations.
6. I affirm to the best of my knowledge and belief that the NFA report prepared for the Facility, and all information, data, documents and reports relied upon for this NFA report, are true, accurate and complete.



Signature of Affiant

Sworn to before me and subscribed in my presence this 5th day of November, 2015.



Notary Public

ERICA ASKEW
NOTARY PUBLIC, STATE OF MI
COUNTY OF CALHOUN
MY COMMISSION EXPIRES Aug 10, 2017
ACTING IN COUNTY OF Calhoun

David V. Dryburgh, CPG Project Geologist/Manager

Professional History

06/2006 - Present, AECOM
01/2001 - 06/2006, DLZ of Michigan, Inc.
Project Geologist
01/1998 - 01/2001, Weston Solutions
Project Geologist

Education

BS, Geology, Central Michigan University,
1997

Years of Experience

With AECOM: 9
With Other Firms: 8

Professional Affiliations

American Institute of Professional
Geologists

Training

OSHA HAZWOPER 8-Hour Refresher
Training
OSHA HAZWOPER 40-Hour Training
OSHA 8-Hour Confined Space
Performance Training
e-RAILSAFE Contractor
First Aid and CPR
Site Health and Safety Coordinator
Training

Mr. Dryburgh is a geologist with more than 17 years of experience in the environmental consulting industry in Michigan. He serves as a project geologist and project manager for the Environment business line in the Grand Rapids, Michigan office.

Mr. Dryburgh's experience includes involvement as the lead geologist and/or project manager of projects involving Phase I/II environmental site assessments, baseline environmental assessments and due care plans, remedial investigation/feasibility study projects, enhanced reductive dechlorination projects, RCRA facility investigations, and remediation system design. He has worked throughout the Midwest on a wide range of projects maintaining an excellent relationship with a variety of private, state, and federal clients.

Experience

Enbridge Energy Limited Partnership, Crude Oil Pipeline Leak - Compliance Support, Grand Rapids, Michigan. Project manager for the high-profile project to assist Enbridge maintain compliance with state and federal orders and regulations. Also provide management of AECOM's Battle Creek field office. The complexities and schedule demands of the project require active big picture management and regular meetings with Enbridge, Michigan Department of Environmental Quality, and US Environmental Protection Agency.

TDY Industries Inc., Groundwater Capture and Treatment System - 2015 Operations and Maintenance, Muskegon, Michigan. Project manager for this project involving O&M and compliance monitoring of a large groundwater capture and treatment system. The system maintains hydraulic control of groundwater preventing migration to surface water receptors. Also, planned and coordinated the injection of ERD substrates and bioaugmentation cultures necessary to treat impacted groundwater in situ.

Nestle Waters North America, Consulting Services, Michigan. Project manager/geologist conducting as needed services for a water bottling company. The contract services vary from assisting with presentation preparation, scientific data collection and processing, and geologic and hydrogeologic evaluations of area water resources. Able to meet the client's needs by; utilizing broad past experience, assigning task to various qualified individuals within AECOM, and being able to provide the client with a quick response time when needed.

Michigan Department of Environmental Quality, Hoskins Manufacturing, Mio, Michigan. Project geologist and field manager in charge of coordinating and managing a large remedial investigation which

included three rotosonic drill rigs and crews, two mobile laboratories, and two offsite fixed laboratories producing multiple data streams. In charge of data compilation and review necessary to make real-time field decisions to drive ongoing investigation. The high-profile project involves chlorinated VOCs and heavy-metal soil and groundwater contamination migrating into sensitive surface water bodies in a small northern Michigan community. Also completed surface water and sediment sampling, a toxicity study, compiled multiple technical memoranda, and a feasibility study.

Michigan Department of Environmental Quality, M-13 Ramps, Saginaw, Michigan. Project manager for recovery of hazardous waste (PCB containing oil) from the groundwater. AECOM was tasked to recover the PCB oil using available technologies and stay within budget. Used a small Spider-Sonic rotosonic rig to install two 4-inch diameter recover wells to maximize oil recovery. Periodically vacuum extracted product from multiple wells.

Waterford Township, Waterford Former F&O Facility Leaking Underground Storage Tank Site, Waterford, Michigan. Managed all aspects of the remedial investigation including widespread soil boring investigation, monitoring well installation, and quarterly monitoring well sampling. Completed a FAR/FS/CAP recommending monitored natural attenuation following appropriate MDEQ guidelines.

Michigan Department of Environmental Quality, Dave's Shell Site, Buchanan, Michigan. Coordinated a geophysical study, delineation of free product, and soil and groundwater contamination. Implemented initial free product recovery, conducted a risk assessment, pathway evaluation, and receptor survey including indoor air sampling.

Michigan Department of Environmental Quality, Five A Oil, Whitehall, Michigan. Identified the individual USTs within the UST farm and completed characterization sampling. Coordinated and oversaw the decommissioning of the UST farm and associated pumps, piping, and dispensers. Conducted remedial investigation activities of residual contamination including the delineation of free product, soil and groundwater contamination and compliance monitoring of site monitoring wells. Prepared final assessment report, feasibility study, and corrective action plan for the site.

Michigan Department of Environmental Quality, Contaminated Site Investigation, Wurtsmith AFB, Michigan. Underwent extensive experience completing project-related activities since 2001. The site is contaminated with a wide range of chemicals including chlorinated and non-chlorinated hydrocarbons, heavy metals, and PCBs. Managed the coordination, implementation, and data processing for various investigative activities including monitoring well identification, survey, and sampling, test pit (source identification) activities, cluster well installation and sampling activities, and oversight and observation of Air Force contractor activities.

Michigan Department of Environmental Quality, Howard Street, Lapeer, Michigan. Coordinated and field implemented all activities including; a geophysical study using EM-31, EM-61, and GPR technology, two soil boring installation events, and a sanitary sewer survey identifying areas of likely contaminate infiltration into the sanitary line. Compiled historic data

and the results of the investigation, including boring logs, plume maps, cross sections, analytical data, and geophysical data into a GIS database.

Chrysler, Former Scio Township Automotive Plant, Ann Arbor, Michigan. Project geologist in charge of coordinating and implementing remedial investigative activities including a chlorinated hydrocarbon source soil investigation using soil gas probes installed over an extensive grid pattern. Findings of the soil gas investigation include a third, previously unknown, source with a chlorinated groundwater plume leading to a nearby river. Completed multiple phases of the groundwater investigation including the installation of shallow and deep wells and wells installed near the groundwater/surface water interface. Collected appropriate data for application of a mixing zone determination.

Michigan State University, Dunbar Forest Leaking Underground Storage Tank Site, Sault Ste. Marie, Michigan. Complied previously collected analytical data and site information into a closure report. Worked closely with the client to obtain a deed restriction necessary to close the site. Submitted closure report, proof of deed restriction, and other requested documentation to the MDEQ. Obtained a restricted site closure from the MDEQ.

Michigan Department of Environmental Quality, Corps of Engineer's Cleaners, Milford, Michigan. Responsible for coordinating and conducting a remedial investigation into a large contaminant plume in close proximity to the city's municipal wells. Investigation was completed using rotosonic drilling technology and conventional, hollow stem, drilling technology. The investigation identified the extent of contamination and determined that a mixed plume (chlorinated hydrocarbon and gasoline constituents) was threatening the well field. Also conducted mud rotary and directional drilling during construction of the treatment system and associated recovery wells.

Michigan Department of Environmental Quality, Thermofil, Brighton, Michigan. Project geologist in charge of coordinating and conducting the remedial investigation into a chlorinated plume within a residential neighborhood east of Brighton. Used hollow-stem auger drilling technology and simulprobe sampling techniques to vertically profile the 120 foot deep aquifer. With the use of the MDEQ mobile lab, followed the ½ mile long plume through the residential neighborhood and across US-23, and set wells to appropriately define the vertical and horizontal extent of the groundwater contamination. Completed the investigation in cooperation with the city of Brighton, MDOT, and area residence.

Michigan Department of Environmental Quality, Portside Cleaners, Elk Rapids, Michigan. Project geologist on the project involving an investigation into chlorinated hydrocarbon contamination from a dry cleaner. Conducted a review a historic and recent results, and compiled into a GIS database. Presented the information to the MDEQ project manager in GIS format.

Georgia-Pacific, GP Distribution Center Leaking Underground Storage Tank Site, Grand Rapids, Michigan. Conducted the compiling of historic information and managing of additional remedial investigation activities including monitoring well installation, quarterly monitoring well sampling,

and hydrogeologic data interpretation. Worked closely with the client to obtain a deed restriction necessary to close the site. Obtained a restricted site closure from the MDEQ.

Michigan Department of Environmental Quality, 4-Corners, Traverse City, Michigan. Managed the coordinating and conducting of the remedial investigation into a large gasoline/diesel plume originating from multiple sources. Used the MDEQ mobile lab to investigate the down gradient extent of the plume and define the unusual downward gradient of the gasoline plume. Presented the investigative findings, including the hydrogeologic conditions and proposed cleanup strategy, to the site property owners and area residence in cooperation with the MDEQ project manager and division manager.

Mika, Meyers, Beckett & Jones, PLC, Land Transactions Site Assessment, Michigan. Project manager on various Phase I, Phase II, and environmental follow-up activities associated with property acquisitions for a local law firm. The projects entail a detailed investigation into previous site use while maintaining confidentiality of the business entities involved. Was able to obtain all information to the client's satisfaction on time and under budget.

Michigan Department of Transportation, Highway Expansion Corridor Study, Michigan. Conducted environmental assessments at multiple properties along I-94 and M-59. Conducted site reconnaissance, MDEQ file review, and a review of regulatory information.

US Postal Service, Site Assessments, Michigan. Conducted Phase I and II investigation involving multiple federal post office facilities and surrounding properties.

Michigan Department of Environmental Quality, Coral General Store, Coral, Michigan. Conducted an investigation and acute risk abatement of a leaking underground storage tank system under the MDEQ-PSC program. Conducted a GPR study, delineation of free product, soil and groundwater contamination. Compiled investigation data into a final assessment report, feasibility study, and corrective action plan.

Private Industrial Client, Large Scale Chlorinated VOC Pilot Study, Elyria, Ohio. Managed the installation, using air and mud rotary drilling technology, of multiple injection and monitoring well transects installed within the shallow bedrock aquifer, perpendicular to groundwater flow, in two separate areas. Conducted pre-injection groundwater monitoring of network wells and field/laboratory tests for multiple chemical and physical parameters. Field implemented the injection to oxygen release compound (ORC) in one area, and hydrogen release compound (HRC) in the other area. Conducted post-injection groundwater sampling on a logarithmic-like interval for a period of one year. Assisted with the evaluation and presentation of the pilot study results, including recommendations to proceed with the full scale remedial implementation. The project is currently used as a case study on the Regenesi® website.