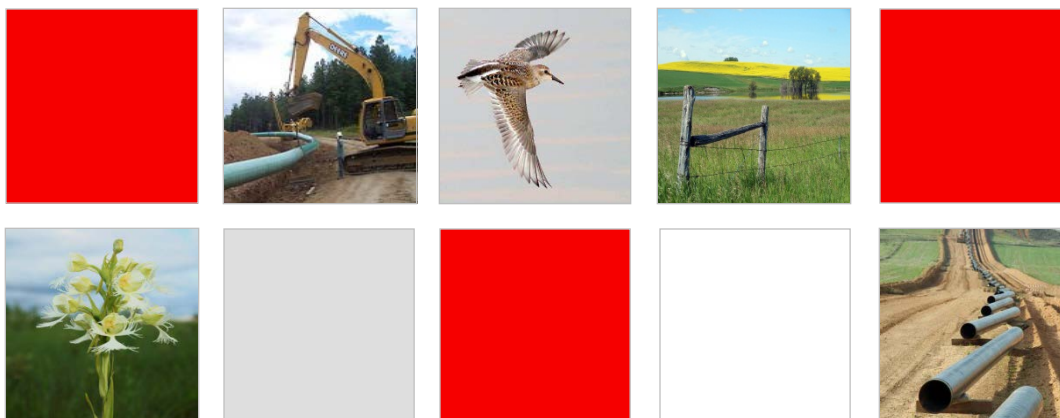


Contaminated Sites Management Plan

To be inserted in binder as Exhibit M





# **Sandpiper Environmental Services Sandpiper Pipeline Project**

## **Draft Contaminated Sites Management Plan Outline**

PRESENTED BY BARR ENGINEERING  
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# **1.0 Introduction**

This Contaminated Sites Management Plan (CSMP) outline has been prepared by Enbridge for the Sandpiper Pipeline Project (Project). This outline will be used to develop a complete CSMP prior to the commencement of construction activities.

## **1.1 Purpose**

The purpose of the CSMP is to provide guidance on the management of historically contaminated soil, groundwater, and potential debris that may be encountered during construction. The CSMP is also intended to provide guidance for documenting residual contamination that may be left in place after construction is completed.

Enbridge prepared an Environmental Protection Plan (EPP) that addresses construction related spills as a separate document from the CSMP. Enbridge, working with its contractors and consultants, will oversee and/or coordinate with any existing utilities or landowners the required activities associated with the management of contaminated soil, groundwater and debris that may be encountered during construction.

## **1.2 Background**

### **1.2.1 General Project Construction Information**

The Project begins at Enbridge's Beaver Lodge station south of Tioga, North Dakota, extends to Clearbrook, Minnesota, and continues to an Enbridge terminal in Superior, Wisconsin, as shown on Figure 1.

### **1.2.2 Areas of Known Historical Contaminated Soil Impacts**

Prior to construction, Enbridge will conduct a desktop review of environmental data to identify sites with potential contamination and/or historical environmental issues along the proposed construction footprint. Data will be collected from the following sources:

- Enbridge's historical release database
- Publically available environmental databases

## **1.3 Roles and Responsibilities**

### **1.3.1 Enbridge's Major Projects Environmental Staff**

Enbridge's Project Environment Staff will provide overall leadership and direct construction activities associated with the CSMP for the entire Project.

### **1.3.2 Enbridge's Operations Environmental Staff**

Enbridge's Operations Environmental Staff will provide site specific oversight for CSMP activities conducted where the line is collocated along Enbridge's existing pipeline corridor(s) and facilities.

### **1.3.3 Soils Management Consultant**

The soils management consultant will conduct the desktop environmental review prior to construction. The soils management consultant will also oversee and coordinate site specific management and disposal of historically contaminated soil, water or debris that is encountered during construction.

Enbridge, working with its contractors and consultants, will oversee site specific management and disposal of contaminated soil, groundwater or debris that may be encountered during construction.

### **1.3.4 Mainline Construction Contractors**

Enbridge will specify that construction contractors and subcontractors provide excavation, staging and hauling for disposal of contaminated soil, water and debris. The construction contractors will work under the direction of the soils management consultant and Enbridge when CSMP activities occur.

## **2.0 Site Assessment and Response Actions**

Site assessment and response actions specific to CSMP activities are intended to allow for safe, timely, and efficient management of contaminated soil, groundwater, and debris that may be encountered in the construction trench at historical release sites during construction.

## **2.1 Identification of Sites with Historical Contamination**

Enbridge anticipates two possible types of historical release sites (known and unknown) may be encountered during construction that may require implementation of CSMP activities.

### **2.1.1 Known Historical Release Sites**

Known historical release sites include sites identified during the pre-construction desktop review which includes regulatory database(s) and/or the Enbridge Leak Reporting System (LRS).

### **2.1.2 Unknown Historical Release Sites**

Unknown historical release sites include those not identified during the pre-construction desktop review. Unknown release sites could include releases encountered while constructing adjacent to a foreign utility right-of-way, releases that occurred prior to Enbridge ownership of the asset, as well as third party contamination that may have migrated onto the right-of-way.

## **2.2 Notification Procedures**

Enbridge will develop notification procedures for planning; scheduling, reporting and responding to historical contamination encountered during construction and will include company staff, contractors and response teams. The procedures may vary depending on which state agencies are involved, the location of historical contamination and the responsible party.

## **2.3 Contaminated Soil Management**

Enbridge plans to manage contaminated soil associated with historical releases in accordance with applicable regulatory rules and guidelines. It is not the intent of the CSMP to delineate or remediate the horizontal and vertical extent of any soil impacts encountered during Project construction activities. Depending on site-specifics, additional follow-up assessment and remediation activities may be required at certain sites but would be conducted outside the scope of the CSMP.

### **2.3.1 Soil Characterization**

The soils management consultant will perform field screening and analytical sampling of soil suspected of being contaminated for the purpose of waste characterization and disposal.

### **2.3.2 Onsite Soil Management and Offsite Disposal**

Enbridge will develop criteria for management and disposal of contaminated soil to ensure compliance with applicable rules and regulations that will vary depending on the responsible party, who was in control of the right-of-way or facility prior to construction and, if necessary, based on regulatory requirements. A soil field screening component will be developed as part of the criteria.

## **2.4 Contaminated Groundwater Management**

Enbridge plans to manage contaminated groundwater associated with historical releases in accordance with applicable regulatory rules and guidelines. It is not the intent of the CSMP to delineate or remediate the horizontal and vertical extent of any groundwater impacts encountered during construction activities. Depending on site-specifics, additional follow-up assessment and remediation activities may be required at certain sites but would be conducted outside the scope of the CSMP.

### **2.4.1 Groundwater Characterization**

The soils management consultant will perform field screening and coordinate laboratory sample analysis for the purpose of waste characterization and disposal, if necessary.

### **2.4.2 Onsite Groundwater Management and Offsite Disposal**

Enbridge will develop criteria for characterization, management, and disposal of contaminated groundwater that will vary depending on the responsible party, who was in control of the right-of way or facility prior to construction and, if necessary, based on regulatory requirements. A sheen field screening component will be developed as part of the criteria.

## **2.5 Contaminated Debris Management**

Enbridge plans to manage debris associated with historical releases in accordance with applicable regulatory rules and regulations guidelines.

### **2.5.1 Debris Characterization**

The soils management consultant will perform field screening and coordinate laboratory sample analysis for the purpose of waste characterization and disposal, if necessary.

### **2.5.2 Onsite Debris Management and Offsite Disposal**

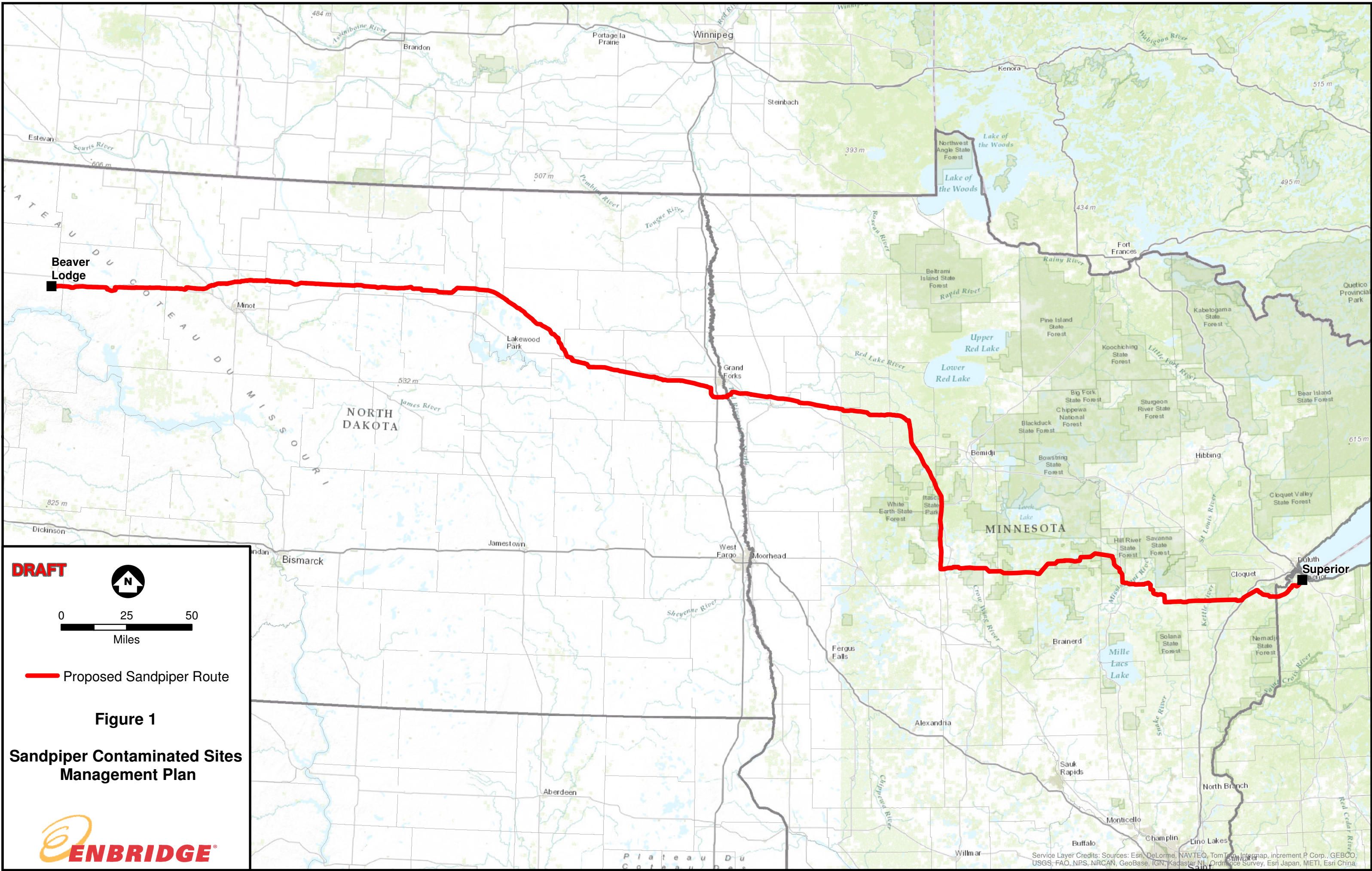
Enbridge will develop criteria for characterization, management, and disposal of contaminated debris that will vary depending on the responsible party, who was in control of the right-of way or facility prior to construction and, if necessary, based on regulatory requirements. A field screening component will be developed as part of the criteria.

## **2.6 Site Restoration**

Restoration at sites where CSMP activities have taken place will occur in accordance with the EPP. Enbridge or contractor(s) will obtain backfill necessary to replace the volume of contaminated soils removed from approved, clean offsite borrow sources.

## **3.0 Reporting**

The soils management consultant will prepare reports for CSMP activities on a site-specific basis using a standard format template and will account for the types of contaminated materials encountered and records of disposal.



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Proposed Sandpiper Route

**Figure 1**  
**Sandpiper Contaminated Sites Management Plan**

