Appendix J

Contaminated Sites Management Plan

(page intentionally left blank)



Contaminated Sites Management Plan (CSMP)

Enbridge Solar (Plummer) L.L.C. • Plummer 130 MW Solar Project

November 2023



TABLE OF CONTENTS

1.0	PURPOSE AND APPLICABILITY OF THE CONTAMINATED SITES MANAGEMENT PLAN 3			3	
2.0	BACKGROUND INFORMATION				
3.0	PLAN DETAILS				
	3.1	IDENTI	FICATION OF CONTAMINATION	3	
	3.2 NOTIFICATION AND DOCUMENTATION			4	
	3.3	MATERIALS MANAGEMENT		4	
		3.3.1	Soil	4	
		3.3.2	Water	4	
		3.3.3	Other Contaminated Waste Material	5	
	3.4	4 PLAN CONTACTS			
4.0	REPORTING				

<u>FIGURES</u>

Figure 1	1998 Land Treatment Area
Figure 2	2023 Evaluation Area

1.0 PURPOSE AND APPLICABILITY OF THE CONTAMINATED SITES MANAGEMENT PLAN

This Contaminated Sites Management Plan (CSMP or Plan) was developed by Enbridge Solar (Plummer), LLC ("Plummer Solar"). This Contaminated Sites Management Plan ("Plan") provides measures that Plummer Solar, including its staff and/or contractors, plan to use to manage material (soil and water) with historical petroleum impacts, if encountered, during construction of the Plummer Solar Project ("Project") Site in Red Lake County, Minnesota. This Plan will be incorporated by reference into the Site Permit issued by the Minnesota Public Utilities Commission ("Commission"). The mitigation measures specified in this Plan will be implemented in accordance with the conditions discussed below.

This Plan is organized into the following sections:

- Section 1 includes the Plan's purpose and applicability.
- Section 2 includes background information.
- Section 3 provides Plan details.
- Section 4 describes reporting requirements.

2.0 BACKGROUND INFORMATION

In 1998, a 5,700-barrel crude oil spill occurred as the result of a third party incident on a portion of the Project Site (Minnesota Pollution Control Agency [MPCA] Spill #29074). Incident response and remediation measures included product recovery and an MPCA-approved land treatment remedy in which petroleum impacted soil was tilled to facilitate contaminant degradation. Groundwater contamination was not detected. The area impacted by the 1998 release and subsequent land treatment is shown on Figure 1. Soil monitoring was completed at the site annually until analyte concentrations were below established clean-up levels and the site was closed by the MPCA in 2007.

Pockets of soil with historical petroleum impacts have previously been encountered along the Enbridge pipeline right-of-way (ROW) during pipeline construction and maintenance projects, most recently in 2021. Although this was a small and minimially impacted area, the potential to encounter impacted areas across the historically impacted area remained. As such, in August 2023, as part of a larger effort to evaluate the Project Site for various design factors, subsurface conditions were evaluated to the depth of construction during completion of 11 geotechnical soil borings and 4 test pits within the area as shown on Figure 2. Soil samples recovered from the borings and test pits were field screened for evidence of petroelum impacts at regular intervals and no odor, sheen or elevated organic vapor headspace readings were observed in any of the borings or test pits.

3.0 PLAN DETAILS

Although the investigation within the historically impacted area in 2023 did not encounter any impacted areas, isolated pockets could be encountered during construction. In the event historical petroleum-impacted soil is encountered during construction, Plummer Solar will manage contaminated materials in accordance with this Plan.

3.1 IDENTIFICATION OF CONTAMINATION

Material (soil and/or water) with historical petroleum impacts will initially be identified, if present, by the Project and/or the Envionmental Consultant representative based on field observations (e.g., soil with a

petroleum odor, water with a visible petroleum sheen or free-product) and/or elevated organic vapor field headspace readings using a photoionization detector (PID).

3.2 NOTIFICATION AND DOCUMENTATION

If petroleum-impacted material is encountered, the Environmental Consultant will notify Enbridge Environment as soon as possible, and Enbridge Environment will notify the Minnesota Duty Officer. The Environmental Consultant and the Enbridge Environment team will also initiate the procedures in this Plan and communicate the Plan to the Onsite Representative (OR) / Site Inspector. As the Plan progresses, status updates will be provided to the OR to facilitate the management of onsite and offsite material.

3.3 MATERIALS MANAGEMENT

Petroleum-impacted material will be segregated and managed separately from material without observed or suspected petroleum impacts.

3.3.1 Soil

The Environmental Consultant will field screen excavated soil for organic vapors using a PID. Soil with a headspace reading greater than 10 parts per million (ppm) or with other evidence of petroleum impacts (e.g., odor, sheen, free-product) will be considered impacted.

Impacted soil will be containerized or placed on plastic sheeting and covered with plastic sheeting until disposal at an off-site facility is approved and coordinated. The Environmental Consultant will collect soil characterization samples from the stockpile for laboratory analysis, as required for off-site disposal.

Enbridge's contractor will clean the excavator bucket and/or grader prior to moving to a new location if petroleum-impacted soil is identified.

Enbridge Environment/ the Environmental Consultant will identify the landfill and complete the waste profile application process for management of petroleum-impacted soil. The approval process typically takes approximately one week from the date of sample collection. Plummer Solar is responsible for coordinating the containerization and/or stockpiling of soil and the loading and transportation of impacted material to the identified facility. Enbridge Environment will provide the OR with site-specific material hauling manifests and the OR is responsible for providing signed manifests to the transporters for each load. The OR will submit copies of the completed manifests along with a hauling summary to Enbridge Environment.

Enbridge Environment has identified the Mar-Kit Landfill in Hallock, MN as a possible disposal location for impacted soil.

3.3.2 Water

Water conditions in Project excavations and dewatering structures will be regularly monitored for evidence of petroleum impacts during Project activities. Impacted water will be identified based on visual observations (presence of rainbow sheen or residual crude oil). Field tests (stick and jar test) will be used to determine whether a sheen is petroleum-based or biogenic.

If petroleum-impacted water is identified in a location that is being dewatered, dewatering activities will cease immediately. Petroleum-impacted water that is pumped from excavations will be containerized for off-site disposal. Water sample(s) will be collected for laboratory analysis to facilitate off-site disposal approval. Analytical parameters will be based on water treatment facility permit requirements.

Enbridge Environment/ the Environmental Consultant will identify the water treatment facility and complete the profile application process for management of petroleum-impacted water. The approval process typically takes approximately one week from the date of sample collection. Plummer Solar is responsible for coordinating the containerization and/or onsite management of water and the loading and transportation of impacted material to the identified facility. Enbridge Environment will provide the OR with site-specific material hauling manifests and the OR is responsible for providing signed manifests to the transporters for each load. The OR will submit copies of the completed manifests along with a hauling summary to Enbridge Environment.

Enbridge Environment has identified the Western Lake Superior Sanitary District (WLSSD) water treatment facility in Duluth, MN as a possible disposal location for impacted water.

3.3.3 Other Contaminated Waste Material

Based on the planned scope of work, the generation of other contaminated waste streams during the Project is not anticipated. However, if other waste streams are generated, notify Enbridge Environment and a disposal plan will be initiated.

3.4 PLAN CONTACTS

The Plan contacts include:

- Enbridge Environment: Kristy DeVera (218-340-3136); Nick Larabel (269-330-3872)
- Onsite Representative (OR): Site Inspector: TBD
- Environmental Consultant Office Support: TBD
- Environmental Consultant Field Staff: TBD

4.0 REPORTING

If petroleum-impacted materials are encountered, a memorandum summarizing environmental conditions, field observations and material management activity will be prepared by the Environmental Consultant/ Enbridge Environment and submitted to the MPCA.

FIGURES



Barr Footer: ArcGIS 10.8.1, 2023-11-28 10:16 File: I:\Client\Enbridge_Energy\Work_Orders\Solar_Permitting!23631016\Maps\Reports\Site_Permit_App\KCSMP\Figure 1-1998 Land Treatment Area.mxd User: EMA

Project Site Boundary

Area Impacted by the 1998 Release

Imagery: USDA NAIP, 2021



900

0

1,800

Feet

Figure 1 1998 LAND TREATMENT AREA Known Contaminated Sites Management Plan (KCSMP) Enbridge Solar (Plummer), LLC (Plummer Solar)





Barr Footer: ArcGIS 10.8.1, 2023-11-28 10:16 File: 1:\Client\Enbridge_Energy\Work_Orders\Solar_Permitting\23631016\Maps\Reports\Site_Permit_App\KCSMP\Figure 2-2023 Evaluation Area.mxd User: EMA