

Minser, Amy J - DNR

From: Minser, Amy J - DNR
Sent: Friday, December 17, 2021 8:19 AM
To: Tim Drake
Cc: Destiny Kerr; Sara Thronkson; Jacobson, Matthew J - DNR; Whitens, Samantha M - DNR; Callan, Benjamin S - DNR; Dobbins Haydin, Shannon K - DNR
Subject: Enbridge Line 5 Relocation FIN 73858-Comments on Storm Water NOI

Mr. Drake,

The department has the following comments on the materials submitted with the NOI for Enbridge Line 5 relocation, FIN 73858:

General questions:

1. What level of clearing, grubbing, or other ground disturbance will be completed in the right-of-way over the HDD route? If applicable, what type of erosion and sediment control will be provided?
2. Why is there not more HDD for > 20% slope areas?
3. How will the additional work areas be used? Will temporary matting or gravel be placed? Will soil be stockpiled there? How long will they be in use? What is the plan for permanent stabilization? Will cover crops be planted to provide stabilization where a row crop field is being used for a laydown area?
4. How will it be decided whether wire-backed silt fence, regular silt fence, or a manufactured perimeter control device is needed where perimeter controls are shown?
5. How were laydown/additional work areas chosen? Was any consideration given to avoiding slopes >20%, such as on Sheet 13?
6. Have locations where trackout control is proposed near local roads been evaluated to determine if a culvert is needed? Please provide documentation that this has been completed and show culvert locations on the erosion and sediment control plans. If the ditch adjacent to the road is delineated as wetland, the department recommends placing the trackout control on adjacent upland so that matting can be used over the wetland.
7. For locations where waterway crossing methods will be determined in the field based on flow conditions, can detailed erosion control plans be submitted between the time the approach is decided and start of construction across the waterway?

General comments:

8. Please provide a complete updated drawing set, including any changes since the plan set submitted on 2/22/2021. The update provided on 6/14/2021 was not reviewed as there was no clear correlation to the full drawing set. Please integrate the design and site-specific erosion control for the mainline valve sites into the larger plan set. Any future updates need to be identified by sheet number corresponding the numbers in the updated set. To the extent possible, please include information on the plan set—referencing more than 2 separate documents during review is not efficient.
9. Please provide the most current impact table for wetlands and waterways.
10. The wetland consultation documentation attached to the NOI indicates that there were gaps in the field delineation at the time of consultation and comments provided during consultation. Please provide documentation that the comments have been resolved and that any additional areas delineated have been reviewed by office of energy water staff responsible for wetlands and waterways. Areas of specific concern identified to date are depicted on sheets 6 and 107.
11. There are some locations where HDD either begins or ends at a wetland location with adjacent upland. Please provide additional narrative on why the pit cannot be relocated to reduce impacts to the wetlands. Locations noted to date are depicted on sheets 60 and 109, but there may be others.
12. Please show the location of all mapped streams within a quarter mile of the work site per s. NR 216.46 (5) (h), Wis. Adm. Code. For unnamed streams, it would be helpful if they were labeled in a way that indicates which named stream they flow into, i.e. 'Trib. to Vaughn Creek).
13. There are details for waterway crossings and wetland crossings, but no detail for work where there are wetlands on either side of the waterway being crossed. Please either provide detailed crossing figures for locations where this occurs or a detail that addresses this situation.
14. Please provide site-specific erosion control plans for non-HDD stream crossings with slopes steeper than 20% on one or both sides of the stream. The scale of the drawings should be sufficient to show the level of detail needed. This is likely to be on the order of 1" = 50' or less.
15. The narrative submitted on 6/14/2021 identifies that either stone pads or timber mats would be installed at entrances for trackout control. Timber mats are unlikely to reduce trackout to the extent necessary. They may be used to provide a 'stabilized work surface' if they cover the entire surface such that construction vehicles are not transferring sediment to local roads during construction of the area associated with a fully stabilized work surface.
16. Please label areas where matting or gravel will be placed on a temporary basis.
17. Please provide an anticipated staging layout for HDD begin and end locations along with site-specific erosion control for these areas. If matting will be used, please indicate the proposed extents.
18. Please provide a spill prevention and response plan for the project.
19. Please provide the following information on proposed HDD operations:
 - a. Measures to be taken to prevent IR.
 - b. The expected source of water for the drill mud.
 - c. Proposed locations for disposal of cuttings drill mud.
 - d. Proposed drill mud content, including additives that are likely to be used.

- e. Which locations will require a cultural resource monitor?
 - f. Will the contractor have the option to add 'convenience drills', and if so, what is the approval procedure?
20. Please label areas of existing development (existing roads, gravel, etc.) and the distance between any new permanent impervious surfaces to wetlands and waterways to demonstrate compliance with s. NR 151.125, Wis. Adm. Code.
21. Please include ditch check silt fence relief where concentrated flow paths cross a line of silt fence and any low points along a run of silt fence. This also may include locations where breaks in topsoil/subsoil windrows are provided to pass water.
22. Figure 9 shows anchored straw mulch for an area with >20% slope next to a water resource. Erosion control matting without plastic netting is recommended for this situation.
23. In the WinSLAMM modeling, the inputs for width and effective flow length appear to have been transposed. Please revise. The total filter strip width should be the measurement perpendicular to the direction of flow.
24. Sheet 57 shows that a significant portion of the Peters Pipeyard has slopes steeper than 20% that drain offsite. Will there be ground disturbance in that area?
25. Sheet 108 has a road labeled Stephenson Road that is labeled Steinmetz Road on Google Maps. Please explain or revise.

Comments on the EPP dated September 16, 2021 (referenced technical standards are available at [Storm water construction technical standards | Wisconsin DNR](#)):

26. In Section 5.0 of the EPP, the narrative notes that hydrovac slurry would be disposed of at an 'Enbridge-approved upland subsoil area'. Please provide more information on the contents of that slurry and the locations of proposed disposal.
27. In section 7.1 of the EPP, the text indicates that non-merchantable timber may be used in stabilizing erodible slopes or construction entrances. The department does not consider woody debris or wood chips material appropriate for either use.
28. In Section 7.4, the text notes that a 20 foot buffer of undisturbed vegetation would be left on all stream banks. If the intent is to allow for a vegetated buffer strip, please follow Technical Standard 1054 and begin the buffer uphill of any slopes steeper than 5%.
29. In Section 8.3, the text notes that the contractor must remove sediment when the depth reaches one-third of the height. A similar statement should be provided for straw bales and biologs.
30. In section 8.5, please provide a reference to technical standards 1052 and 1053. Erosion control mats with plastic should not be used near waterways or other sensitive areas to avoid wildlife entrapment.
31. In section 8.6, please reference technical standard 1058 and note that mulch material should be long enough to be effectively crimped. Application rates of land-applied additives for erosion control should follow technical standard 1050.
32. Section 8.8 should include a reference to Technical Standard 1060.
33. Section 8.10 should include a reference to Technical standard 1068. Please note that the permit requirements for dust control are not limited to locations adjacent to residences.
34. In Section 11.0, sandbags are identified as an option for slowing the flow of subsurface water. In areas with clay soils, sandbags are unlikely to slow subsurface water to a rate comparable with pre-construction conditions.
35. Section 25.0 should include a reference to Technical Standard 1061
36. In section 27.0, please indicate how ice control on haul roads, including those with timber mats will be managed.
37. In section 30.0, the following information should be included in the discussion of IR plan:
- a. How the returns and drill mud pressure are typically monitored.
 - b. How frequently will the drill path be inspected during pilot hole drilling, reaming, and pipe installation? It is recommended that some inspection of the drill path be conducted during operations to supplement the operators monitoring efforts. Will drones be used for monitoring?
 - c. Where will the IR response materials that be staged? Given the size of the proposed drill paths, the department recommends staging response materials and equipment at both the beginning and end of each drill path.
 - d. For water body crossings, please include turbidity barriers (Technical Standard 1069) in the list of materials that must be available for IR response.
 - e. Should the following items be included in the list of IR response measures: timber mats, or trench boxes.
 - f. What actions will be taken for an IR that occurs in a wooded wetland area and how that response may change based on the distance the IR is from an accessible upland location?

These comments reflect a partial review of materials submitted with the NOI. Detailed review will resume after written responses and updated submittals are received.

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Amy Minser

Storm Water Engineer-Watershed Management
Wisconsin Department of Natural Resources
Phone: 608-266-4359
Cell Phone: 920-360-0913
amy.minser@wisconsin.gov



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