

CON 12-15 Doc #28742

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May 21, 2015

Mr. Matt Culp Iowa Department of Natural Resources Wallace State Office Building 502 East 9th Street Des Moines, Iowa 50319

Subject: Final Report

Chicago Central & Pacific Railroad, Waterloo Yard

PIN 2160-IAPR-100087, 100146, and 100147

Waterloo, Iowa

Dear Mr. Culp:

AECOM Technical Services, Inc. (AECOM), on behalf of CN, is pleased to submit this Final Report for the Waterloo Yard Site. Also attached is a proof of publication of public notification of action to be taken by the IDNR with regard to the CCP Waterloo Yard, as seen in the Waterloo-Cedar Falls Courier Newspaper on May 7th, 2015, and the Certified Mail delivery receipt of the Institutional Control Letter to the Waterloo School District. If you have any questions concerning this report, please contact Kristopher Nolan at (616) 940-4272 or kris.nolan@aecom.com. If you wish to contact CN directly, please contact Curtis Bartz at (248) 740-6296.

Sincerely,

AECOM

Kristopher J. Nolan, CPG

Project Manager

Brad Hoare, PG

Project Geologist / Deputy Project Manager

c: Curtis Bartz, CN

Stella Karnis, CN (electronic) Devin Sprinkle, CN (electronic) Grand Rapids, MI 49512

May 21, 2015

Mr. Matt Culp **Contaminated Sites Section** Iowa Department of Natural Resources Wallace State Building 502 East 9th Street Des Moines, IA 50319-0034

Subject: Final Report

Chicago Central Pacific Waterloo Yard

Waterloo, Iowa

Mile Post 275.0 to 276.5, Waterloo Subdivision CN PIN Number: 2060-IAPR-100087, 100146, 100147

Dear Mr. Culp,

This Final Report is being submitted by AECOM on behalf of Chicago, Central & Pacific Railroad Company (CCP), in accordance with the Iowa Land Recycling Program (LRP); Rule 137.10(8) Final Report. It documents the completion of remedial actions set forth in the Risk Evaluation/Response Action Report (RE/RA) for the Chicago Central Pacific Waterloo Yard site (Site) located at 1006 East 4th Street, Waterloo, Iowa. The Site is shown in Figure 1. Pertinent documents, activities, and associated dates of key completions are included as follows:

<u>Document</u>	<u>Date</u>
Phase II Environmental Site Assessment Report	April 2001
Phase III Environmental Site Assessment Report	July 2001
Phase II Subsurface Assessment Report	September 2001
Monthly Free Product Recovery Reports	October 2001-June 2003
 Written Authorization for Waterloo East High School Access Agreement 	December 2001
Submittal of LRP Enrollment Application	January 2002
Former LUST Area Groundwater Monitoring Report	February 2002

•	Iowa Department of Natural Resources (IDNR) letter confirming enrollment into the LRP, pending completion of a Participation Agreement	February 2002
•	Submittal of the LRP Participation Agreement	April 2002
•	Earth Tech letter for Submittal of Recommendations for Additional Investigation Activities	May 2002
•	Site Interim Report	May 2002
•	Earth Tech letter Proposal (Addendum #4) for Further Delineation of the Off-Site Plume and Executing a Ground Water Monitoring Program at the Waterloo Yard (CFR-201161), Waterloo, Iowa	May 2002
•	IDNR letter to CN addressing access refusal to adjoining property	June 2002
•	Quarterly Monitoring Event Reports	June 2003-August 2006
•	Phase IIIA Environmental Site Assessment Report	July 2003
•	Pilot Test Report	July 2003
•	Letter to IDNR regarding Public Participation Plan	August 2003
_	Letter to 15141 regarding r dollo r dittolpation r lan	August 2005
•	Letter to City of Waterloo regarding Public Participation Plan	October 2003
•	Letter to City of Waterloo regarding Public Participation	•
•	Letter to City of Waterloo regarding Public Participation Plan	October 2003
•	Letter to City of Waterloo regarding Public Participation Plan Remedial Recovery Systems Started Summary of Geologic and Hydrogeologic Findings from	October 2003 2004
•	Letter to City of Waterloo regarding Public Participation Plan Remedial Recovery Systems Started Summary of Geologic and Hydrogeologic Findings from Four Off-Site Monitoring Wells	October 2003 2004 January 2006
•	Letter to City of Waterloo regarding Public Participation Plan Remedial Recovery Systems Started Summary of Geologic and Hydrogeologic Findings from Four Off-Site Monitoring Wells Semi-Annual Report – October 2006 through March 2007	October 2003 2004 January 2006 July 2007
•	Letter to City of Waterloo regarding Public Participation Plan Remedial Recovery Systems Started Summary of Geologic and Hydrogeologic Findings from Four Off-Site Monitoring Wells Semi-Annual Report – October 2006 through March 2007 Semi-Annual Report – April 2007 through September 2007	October 2003 2004 January 2006 July 2007 January 2007
•	Letter to City of Waterloo regarding Public Participation Plan Remedial Recovery Systems Started Summary of Geologic and Hydrogeologic Findings from Four Off-Site Monitoring Wells Semi-Annual Report – October 2006 through March 2007 Semi-Annual Report – April 2007 through September 2007 Semi-Annual Report – October 2007 through March 2008	October 2003 2004 January 2006 July 2007 January 2007 July 2008
•	Letter to City of Waterloo regarding Public Participation Plan Remedial Recovery Systems Started Summary of Geologic and Hydrogeologic Findings from Four Off-Site Monitoring Wells Semi-Annual Report – October 2006 through March 2007 Semi-Annual Report – April 2007 through September 2007 Semi-Annual Report – October 2007 through March 2008 Semi-Annual Report – April 2008 through September 2008	October 2003 2004 January 2006 July 2007 January 2007 July 2008 March 2009
•	Letter to City of Waterloo regarding Public Participation Plan Remedial Recovery Systems Started Summary of Geologic and Hydrogeologic Findings from Four Off-Site Monitoring Wells Semi-Annual Report – October 2006 through March 2007 Semi-Annual Report – April 2007 through September 2007 Semi-Annual Report – October 2007 through March 2008 Semi-Annual Report – April 2008 through September 2008 Semi-Annual Report – October 2008 through March 2009	October 2003 2004 January 2006 July 2007 January 2007 July 2008 March 2009 July 2009

•	Second 2010 Semi-Annual Report	March 2011
•	Letter of Approval to Shutdown of Recovery Systems in Areas C and D	March 2011
•	Cistern Abandonment Report	September 2011
•	2011 Annual Monitoring Reports	March 2012
•	Soil Gas Site Assessment Work Plan	July 2012
•	Risk Evaluation/Response Action (RE/RA)	November 2012
•	IDNR letter approving the RE/RA	December 2012
•	Demonstration of Compliance Report	January 2013
•	IDNR letter approving the Demonstration of Compliance Report	January 2013
•	2012 Annual Monitoring Report	February 2013
•	2013 Annual Monitoring Report	April 2014
•	Proposal to Temporarily Suspend A & B Remedial System Operation for Site Evaluation	May 2014
•	IDNR Letter of Approval of Shutdown of Recovery Systems in Areas A and B	May 2014
•	Proposed Off-site Institutional Controls for the CCP-Waterloo Yard	June 2014
•	IDNR letter approving Black Hawk County Health Department Water Well Ordnance (I-99) Section 2 Non-public Water Supply Wells (Sub Section 2.3) and the City of Waterloo ordinances City Code Title 8, Chapter 2 Section 8-2-1 as acceptable institutional controls	July 2014
•	Revised Conceptual Site Closure Steps and Timeline	October 2014

•	Proposed On-site Institutional Controls for the CCP-Waterloo Yard	December 2014
•	Blackhawk County Letter of Notification of Institutional Control Implementation	December 2014
•	City of Waterloo Letter of Notification of Institutional Control Implementation	December 2014
•	2014 Annual Monitoring Report	April 2015
•	Waterloo School District Letter of Notification of Institutional Control Implementation	May 2015
•	Public Notification via the Waterloo-Cedar Falls Courier	May 2015

The above listed documents and correspondence document the accomplishment of all provisions set forth in the RE/RA. These documents also provide evidence of accomplishment of compliance with the selected standards for the Site, successful completion of the approved remedial actions, and implementation of the necessary institutional controls. As such, CCP is requesting approval of a certification of Conditional No Further Action for the Site.

If you have any questions or concerns please contact Kristopher Nolan at (616) 940-4272 / Kris.nolan@aecom.com or Brad Hoare at (616) 940-4364 / Brad.hoare@aecom.com. If you wish to contact CN directly, please contact Curtis Bartz at (248) 740-6296 / Curtis.Bartz@cn.ca.

Sincerely,

Kristopher J. Nolan, CPG

Project Manager

Brad Hoare, PG

Project Geologist / Deputy Project Manager

Attachments

C: Stella Karnis, CN (electronic)

Devin Sprinkle, CN (electronic) Curtis Bartz, CN

AECOM File: 60337972

STATE OF IOWA, }

Black Hawk County,

R622 IOWA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL SERVICES DIVISION 502 East 9th Street Des Moines, lowa 50319 Public Notification of Action to Be Taken Per Iowa Administrative Code IAC-567-137, Land Recycling Program and Response Actions Standards for Chicago Central & Pacific Railroad's Waterloo, Iowa The Iowa Department of Natural Resources (IDNR) is proposing approval of no further action and site closure of property located at 1006 East 4th Street in Waterloo, Iowa (Site) by Chicago Central & Pacific Railroad Company (CCP) under the Iowa Land Recycling Program (LRP). The Site is currently an active railyard on which locomotive fueling, rail car maintenance, train marshalling, and track maintenance take place. Historical operations at the Site impacted soil and groundwater with light non-aqueous phase liquid (LNAPL). CCP performed site assessments in 2001, 2002, 2003, 2006, 2012 and 2014 and has performed monthly monitoring activities since October 2001 to monitor the LNAPL plume. Under the LRP, CCP constructed remedial systems that have actively recovered LNAPL since 2004, leading to stabilization of the overall plume. CCP completed a risk evaluation esponse action (RE/RA) report that was approved by the IDNR in November 2012. The IDNR approved shutdown of portions of the remedial systems in March 2011, and final shutdown of all remaining systems in May 2014.

There are no exceedances of towa's statewide standards for soil and groundwater in off-Site monitoring wells. Contaminant concentration levels in on-Site groundwater exceed the statewide standards in small areas, however, it has been demonstrated that these levels are stable and will continue to decrease as a result of actions already taken and natural attenuation / degradation processes. On-and off-Site institutional controls were established in 2014 to mitigate human exposure from LNAPL and LNAPL Impacted groundwater from Site proved by the IDNR record center on the 5th floor of the Wallace State Office Building located at 502 East 9th Street

If you have any questions or need further information please feel free to contact Mr. Matt. Culp at the address above, (515) 725-8337, or matt.culp@dnr.lowa.gov.

I do solemnly swear that the annexed copy of legal

AECOM

R622 Iowa DNR Environmental Services Division

Notice was published in the Waterloo-Cedar Falls Courier, a daily newspaper printed in Waterloo, Black Hawk County, Iowa, once commencing on the 7th day of May, 2015 in the name of said newspaper, and that the annexed rate of advertised is the regular legal rate of said newspaper, and that the following is a correct bill for publishing said notice.

Printer's Bill \$37.52	
Signed	
Subscribed and sworn to before me this 12	
Day of A.D., 20	
Day of May A.D., 20 5 Podo E May Notary Public	\int
Received of	
the sum of	
Dollars.	
In full for publication of the above notice	





Date: May 7, 2015

Brad Hoare:

The following is in response to your May 5, 2015 request for delivery information on your Certified Mail™ item number 70142120000222872033. The delivery record shows that this item was delivered on May 7, 2015 at 8:16 am in WATERLOO, IA 50704. There is no delivery signature on file for this item.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely, United States Postal Service





May 4, 2015

Dr. Jane Lindaman Superintendent Waterloo Community School District Education Service Center 1516 Washington Street Waterloo, IA 50702

Subject: Notification of Institutional Control Implementation for the Chicago, Central &

Pacific Waterloo Yard 1006 East 4th Street Waterloo, Iowa 50703

Dear Dr. Lindaman,

As part of the Site closure plan under the Iowa Department of Natural Resources (IDNR) Land Recycling Program (LRP) (567 - IAC 137), the Chicago, Central & Pacific Railroad Company (CCP) has established Institutional Controls for the Chicago Central & Pacific (CCP) Waterloo Yard (Site) located at 1006 East 4th Street, Waterloo, Iowa. CCP is relying on existing IDNR approved Blackhawk County Health Department's Water Well Ordinance, Regulation 1-99 (Revised 1/1999), Section 2 Non-Public Water Supply Wells, Subsection 2.3 as the institutional control for on- and offsite areas impacted by light non-aqueous phase liquids (LNAPL). These Institutional Controls provide effective protection of potential human exposure to the residual LNAPL present at and down-gradient of the Site. The IDNR has approved the Blackhawk County Ordinance as the Institutional Controls for the CCP-Waterloo Yard Site. The IDNR's approvals of these controls are attached.

The following table summarizes the parcels that will be affected by the Institutional Controls (also shown on **Figure 1**):

Off-Site Parcels		
Associated Parcel ID	Parcel Owner	
City ROW	City of Waterloo	
8913-24-326-035	Waterloo Community School District	
8913-24-326-034	Waterloo Community School District	
8913-24-451-010	Waterloo Community School District	
8913-24-329-014	Waterloo Community School District	
8913-24-327-039	Waterloo Community School District	
On-Site Parcel		
Associated Parcel ID	Parcel Owner	
8913-24-452-007	ССР	

CCP and AECOM appreciate your review and response acknowledging receipt of this letter.

If you have any questions or concerns please contact Kristopher Nolan at (616) 940-4272 / Kris.nolan@aecom.com or Brad Hoare at (616) 940-4364 / Brad.hoare@aecom.com. If you wish to contact CN directly, please contact Curtis Bartz at (248) 740-6296 / Curtis. Bartz@cn.ca.

Sincerely,

Kristopher J. Nolan, CPG Program Manager

Brad Hoare, PG

Project Geologist / Deputy Project Manager

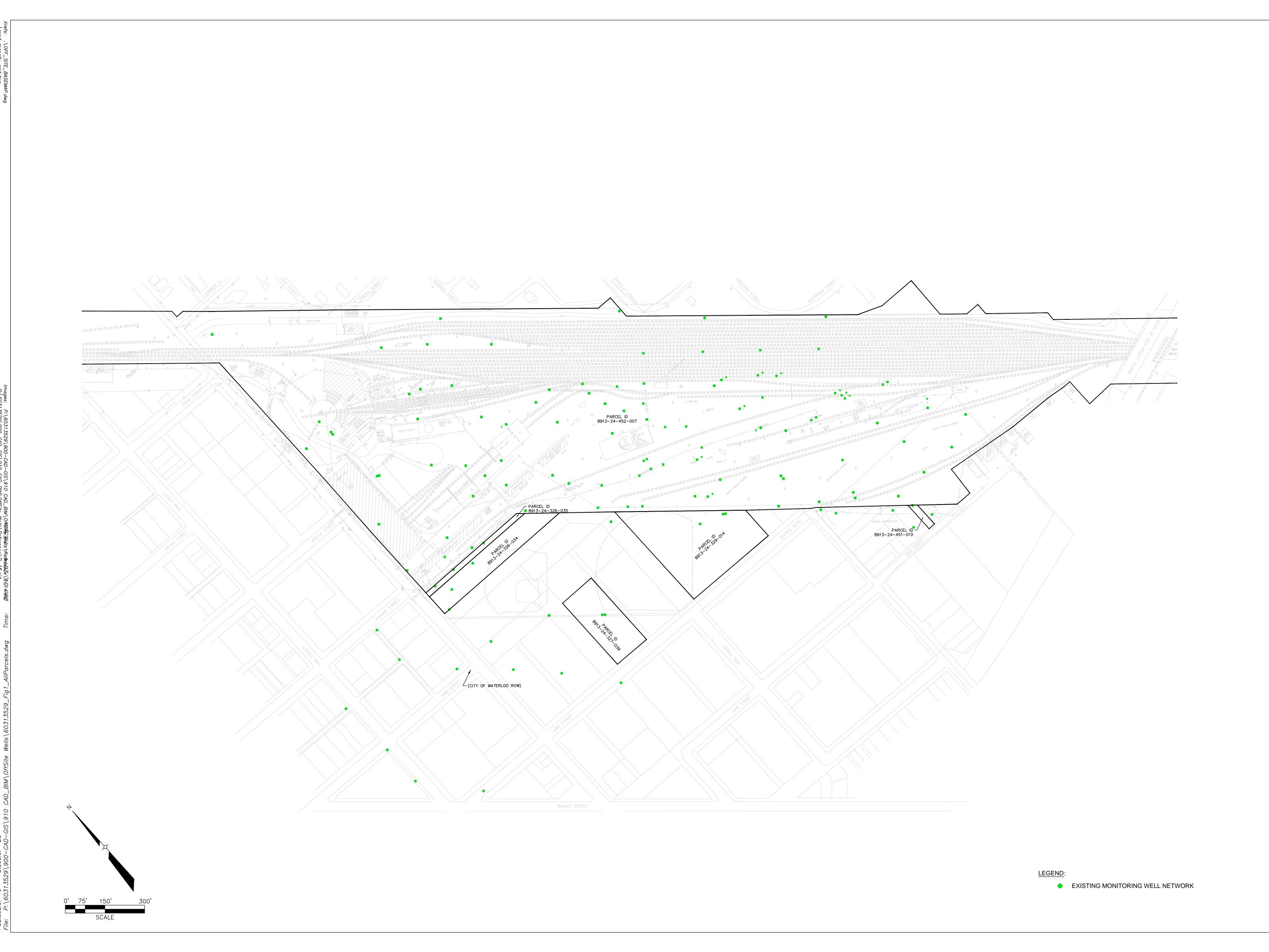
attachments

c: Stella Karnis, CN (electronic)

Devin Sprinkle, CN (electronic)

Curtis Bartz, CN Matt Culp, IDNR

AECOM File: 60313529



CAGO CENTRAL & PACIFIC RAILROAD WATERLOO YARD

DATE

NOV, 2014 PROJECT NO 60313529 FILENAME 60313529_Fig1_AllParcel SHEET NO

FIGURE NO