



November 20, 2019

SCOTT ZURN
MANAGER ENVIRONMENTAL REMEDIATION
CANADIAN PACIFIC
120 SOUTH SIXTH STREET SUITE 700
MINNEAPOLIS MN 55402

Re: Phase II Environmental Site Assessment, Canadian Pacific Railway, East of the Intersection of Farson Road and the Railroad Tracks, Farson, Iowa dated October 21, 2019

Dear Mr. Zurn:

The Iowa Department of Natural Resources, Contaminated Sites Section, (Iowa DNR) has reviewed the above referenced Phase II Environmental Site Assessment (report) prepared by Braun Intertec Corporation on behalf of Canadian Pacific and has the following responses:

- In general, the report routinely referenced procedures and standards found in the Iowa Land Recycling Program (LRP). This site is not enrolled in the LRP and the regulatory review was made in reference to 567-Iowa Administrative Code (IAC)-Chapter 133, *Ruled for Determining Cleanup Actions and Responsible Parties*. If you wish to use the LRP procedures and standards you would need to enroll the site into 567-IAC-Chapter 137, *Iowa Land Recycling Program and Response Action Standards*.
- **D.2.c. Soil Analysis:** As noted in the work plan, samples were to be analyzed for diesel fuel, fuel oil, kerosene oil, and mineral spirits, known as total extractable hydrocarbons (TEH) using Iowa Method OA-2. In the report Pace Analytical laboratory results only reported TEH as diesel. This was an issue that caused an analyte qualifier of M1 in soil sample GP-1(10' to 12.5') (hydrocarbon fractions are present from the early gasoline to late motor oil range). If Pace Analytical would have reported all fractions then the qualifier would not have been needed. This is also an indication that what was reported as diesel may not be all diesel.
- **D.3. Groundwater Evaluation:** The report mentioned groundwater elevations were measured but the results were not presented in the report for GP-2. The field notes should have been included in the report which would have included the groundwater measurement data. The report noted GP-2 was considered 'perched' groundwater. Chapter-133 considers perched groundwater as groundwater; therefore, the GP-2 groundwater should have been analyzed.
- **E.4. Soil Analytical Results:** Chapter-133 is a groundwater protection rule, and as such, soil leaching to groundwater values needed to be reviewed. For soil sample location GP-1(10' to 12.5') ethylbenzene and diesel would fail for the soil leaching to groundwater analysis.
- **E.5. Groundwater Analytical Results:** Chapter-133 does not differentiate between protected and non-protected groundwater as the LRP does. Chapter-133 groundwater action levels are

the appropriate standards for the site with the action levels, for the most part, the same as the LRP Statewide Standards for Protected Groundwater. The sample results for GP-1 indicated benzene, ethylbenzene, and TEH diesel fail the groundwater action levels.

Despite the noted issues above, sample location GP-1 looks to be the only sample point impacted with petroleum products. The groundwater sample at GP-2 would have been helpful to confirm this. Overall the soil and groundwater petroleum impact appears to be isolated in nature; therefore, at this time no further environmental actions are required for the Farson, Iowa former depot site.

This determination is based on site specific conditions and should not be construed to be an endorsement by Iowa DNR that a hazardous condition does not exist on the property. This determination does not constitute an endorsement by Iowa DNR as to the appropriateness of any proposed use of the property. If such endorsements are sought, the property may be enrolled in the Iowa Land Recycling Program, which would involve a thorough investigation and assessment of risks associated with possible uses of the property. As it is, this site can be reopened in the future if environmental conditions, environmental regulations, land use, or other conditions change.

If you have any questions or need further information please feel free to call or e-mail at (515) 725-8371 or dan.cook@dnr.iowa.gov.

Sincerely,



Daniel Cook
Environmental Specialist Senior
Contaminated Sites Section

c: Jeremiah Hansen, Braun Intertec Corporation, 11001 Hampshire Avenue S, Minneapolis, Mn 55438
Bert Noll, Iowa DNR Field Office 5