BUILDING AMERICA®

September 24, 2024

Mr. Jeremy Klatt
Environmental Specialist Senior
Field Services & Compliances Bureau – Iowa DNR
2300 15th St. SW, Mason City, IA 50401

RE: Union Pacific Railroad – Eagle Grove Industrial Wastewater

Mr. Klatt:

As requested, Union Pacific Railroad (UP) provided a timeline of events regarding the investigation of diesel/oil in the sanitary sewer lift station at the Eagle Grove Yard to Iowa Department of Natural Resources on July 12, 2024. The oil was discovered following a period of significant rains which resulted in oily water flooding UP's secondary containment. Since the time of our initial report, UP has held all industrial wastewater in frac tanks pending on-site investigations into potential sources of fugitive oil. Additionally, UP continued to monitor oil and grease at the sanitary lift station, a summary of the analytical is provided below in **Table 1**.

Table 1

Source	Date	Results mg/L
Sanitary Lift Station	7/29/2024	6.0
	8/13/2024	4.4
	8/27/2024	3.1
	9/5/2024	9.3
	9/12/2024	6.0

On August 14, 2024, Ryan Cochran, UP Fuel and Environmental Assets, was on site to continue the investigation of potential oil sources. Mr. Cochran noted that following significant rains the previous day, there were indications that the drains in the locomotive service track (service track) which go to the industrial wastewater treatment plant, potentially overflowed and thus allowed contact industrial wastewater to flow to the ground. The sheet flow from this area has the potential to flow towards a locomotive toilet dump station. The height of the dump station would potentially allow contact industrial wastewater and stormwater to flow into the sanitary sewer system. As a result of this, UP is working with an engineering firm to install controls to prevent the flow of water to the sanitary sewer. The proposed design is to install a rollover curve around the sanitary drain and to install an updated drain cover to prevent water from entering the toilet dump station via sheet flow. Upgrades to the dump station are anticipated to be completed by the end of the year.

The week of September 15, 2024, UP contracted HK Solutions to camera the sanitary sewer lines and industrial wastewater lines within the Eagle Grove Yard. Approximately 1,000 ft of sanitary sewer lines and 1,000 ft of industrial wastewater lines were investigated via camera. There were no line breaks or failures identified during the investigation therefore there are no indications of ground contaminates entering into the system via the sub surface sanitary or industrial wastewater lines.

At this time, Union Pacific concludes that the likely source of oil into the sanitary system is via the locomotive dump station during periods of heavy precipitation. UP wastewater contractors will visually monitor the sanitary lift station for signs of visible oil on a monthly basis. Based on investigations and engineering countermeasures, as well as analytical data, UP requests that we be allowed to begin discharge to the POTW under our current operating permit.

Sincerely,



Jennifer Bradfield Clark

Director – Fuel & Environmental Field Operations

Cc:

Rami Hanash – Union Pacific Sr Counsel

Arash Shahabi – Director Fuel and Environmental Assets

Attachments:

Pace Laboratory Analysis Reports