September 30, 2024

MR TYLER PARKER
UNION PACIFIC RAILROAD
2645 NORTH NEW YORK STREET
WICHITA KANSAS 67219
TAPARKER@UP.COM

Re: Union Pacific Railroad (700 North Cadwell Avenue, Eagle Grove, Iowa 50533)
Contaminated Sites Database Site ID No. 306
Water Characterization Analytical Results

Dear Mr. Parker:

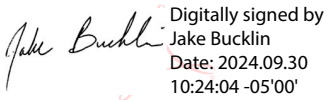
The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) has reviewed the September 7, 2024 Water Characterization Analytical Results (Doc #41915) at the Union Pacific Railroad site located at 700 North Cadwell Avenue in Eagle Grove, Iowa. DNR understands that contaminated groundwater was encountered during construction activities at the site.

Analytical results from the contaminated groundwater returned detections of total extractable hydrocarbons (TEHs) as diesel, gasoline, and waste oil; resource conservation and recovery act (RCRA) metals; polychlorinated biphenyls (PCBs); and multiple volatile organic compounds (VOCs). Of these detections diesel, waste oil, arsenic, lead, PCB-1260, ethylbenzene, xylenes, benzo(a)anthracene, benzo(b)fluoranthene, and phenanthrene were detected at concentrations that exceed applicable regulations.

Due to the contamination detected at the site and potential risk to human health and the environment, this site must conduct an assessment under the State Lead Program. A site assessment in accordance with 567 Iowa Administrative Code (IAC) 133.4(3) is required in order to determine the types, amounts, and sources of contaminants present, hydrogeological characteristics of the site, and the vertical and horizontal extent of contamination with a goal of developing an adequate remedial action plan. The first step towards a complete site assessment is a Site Assessment Plan due by November 15, 2024. The proposal must include: recommendations for collection of relevant historical data such as site management practices, inventory records, literature searches, photographs and personal interviews; a methodology for obtaining groundwater flow information including well placements, construction and elevation, bore logs, static groundwater table measurements, groundwater elevations, groundwater gradients (isopleth), and information on soil transmissivity, porosity and permeability; and a methodology for identifying contaminant plumes, including additional monitoring wells to identify the horizontal and vertical extent of contamination, a site plot showing the estimated configuration of contamination, and a sampling schedule and list of constituents to be analyzed. Development of the plan may require preliminary field investigations. In addition to these requirements, the site assessment plan should include: a receptor survey in that identifies all wells within 1,000 feet of the source area, a pedestrian survey of all wells within 300 feet of the source area, and an explosive vapor survey in the nearest subsurface enclosed spaces to the source area (and/or any nearby locations with a history of vapor problems).

In accordance with 567 IAC 133.4(3), submittal of a site assessment plan is required **by November 15, 2024**. If you have any questions or if we may be of further assistance, please contact me at (515) 415-0889 or jake.bucklin@dnr.iowa.gov.

Sincerely,



Jake Bucklin
Environmental Specialist
Land Quality Bureau

cc: Michael Sullivan
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