

Crosson, Kirk (MOECC)

From: Aaron Stadnyk <Aaron.Stadnyk@cn.ca>
Sent: August-13-15 3:07 PM
To: Crosson, Kirk (MOECC)
Cc: Yousry.Hamdy@arcadis.com; Kondrat, Todd (MOECC); Dorscht, Ron (MOECC); DeVries, Rene (FRANZ)
Subject: RE: Hornepayne CN - ISW request for meeting to reduce monitoring
Attachments: Hornepayne Property Ownership.pdf

Hi Kirk,

Pardon the delay in responding to your email regarding Hornepayne Yard. Following a lengthy bidding process, CN has recently procured Arcadis as our lead technical consultant for the Hornepayne Yard. KGS will still be completing their regular scope of work to meet both the ECA requirements, as well as additional CN related tasks. KGS is also being integrated into the remedial action plan developed by Arcadis, who are now tasked with reviewing the site to determine a more aggressive and innovative manner to address the Site.

I've prepared the following to respond to the three items you have brought up during your last site inspection in 2013:

Soil Disposal Cell:

I've reviewed all available data regarding the soil cell. The following summarizes the cells history to the best of my knowledge:

- The soil cell was constructed in the early 2000s.
- It is in the location of the former aboveground storage tank associated with the former east end fuelling system, which was replaced in 1997/1998.
- I believe the aboveground tank was removed sometime between 1998 and 2000.
- The soil cell is located within the bermed area of this former aboveground tank.
- During the construction of the soil cell, the soil berm was re-graded for placement of a liner, which was then covered with sand.
- The soil presently within the cell came from several large stockpiles (3) of soil that were in the Yard, and located on the north side of the access road near the Little Jackfish River. KGS recalls that the soil piles were positioned on poly. As far as I am aware and from KGS's history of the Site, the stockpiles were located in the yard in 1997. The source of this soil is from the excavation work completed within the yard to construct the West End and East End fueling stand areas, as well as other grading work within the yard.
- Speaking with yard staff, CN has plans to gradually use this material to improve yard access roads.
- Since KGS has been working at the yard, we have had them routinely turn the soils, as they are impacted and collect occasional soil samples. There are large sections of the soil that meet industrial criteria, with some areas that exceed.
- In addition, surface water samples have been collected from areas within the soil berm (likely snow melt or rainfall accumulation), and results have shown no indication of impact.

In summary, as this soil was generated within CN Property, and to my knowledge has never been trucked off of CN land, and because CN has intended use for it in the future, it is not deemed as a waste. Since a large component the material is to some degree useable granular, the yard will utilize and recycle this material in the future to improved some of the internal yard access roads. As such, I do not intend to apply for a Provincial Waste Disposal Site Environmental Compliance Approval at this time. If you have any other information stating otherwise, please let me know and I will reconsider.