

7894

AL HP FR 410

Crosson, Kirk (MOECC)

CN.

From: Crosson, Kirk (MOECC)
Sent: August-14-15 10:00 AM
To: 'Aaron Stadnyk'
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

That is great news that CN will be undertaking a more aggressive and innovative approach on recovering the large volume of historical diesel fuel and associated products, lost at the Hornepayne yard. I look forward to working with you and the staff from Arcadies as this project moves forward.

As for the issues that were identified in the last site inspection (September 2013), thank you for your update. The impacted soil retention area has been equipped with a liner, and water generated from this area is routed to the east end industrial sewage works. The soil has been turned as part of the treatment process for Light Non-Aqueous Phase Liquid. This soil treatment works requires a "processing" waste disposal site approval. Please have your consultants complete an ECA application for this, and submit it October 22, 2015.

As for the Lagoon #1 it appears that you have a plan for this location. Please submit an action plan with time lines for the decommissioning process of the #1 lagoon in cooperation with the Township. I look forward to receiving an action plan by October 30, 2015.

The back-up generator at the staff bunkhouse, will be required to be registered in the Environmental Activity and Sector Registry (EASR) as it will be operated outside a declared emergency under the Emergency Management and Civil Protection Act. These non-declared emergency period could include a local power outage, equipment servicing, testing and operational inspections. I would ask that this equipment be registered in EASR by September 24, 2015. Should you encounter problems in the registration process, please contact the Environmental Approvals Access and Service Integration Branch at 1-800-461-6290 for assistance.

Web link on how to register EASR

<https://dr6j45jk9xcmk.cloudfront.net/documents/2413/how-to-register-for-an-easr.pdf>

Thanks

From: Aaron Stadnyk [mailto: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

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 cell's 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 of the material is to some degree useable granular, the yard will utilize and recycle this material in the future to improve 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.

Lagoon No. 1:

Based on available information, the following summarizes the history of Lagoon No. 1:

- Unfortunately, the exact date of construction of Lagoon No. 1 is unknown. I can only guess that Lagoon No. 1 could have been constructed during or prior to the early 1970s, given that in historical documents, Lagoon No. 2 was reportedly constructed in the early 1970s.
- It appears that a former oil/water separator's (OWS) discharge lines from the former east end fuelling sites discharged to this lagoon, as well as surface water runoff from the south ditch system.
- Presently only surface water runoff from the south ditch area is directly discharged to the Lagoon. However, I suspect it does receive some groundwater input, as we see flow at the discharge of Lagoon 1 even in dry periods when there is no flow/water in the ditch system.
- Like all the Lagoons in the yard, they were likely constructed to mitigate OWS discharge, or as part of a LNAPL treatment or collection system, of which neither exist at the location of Lagoon No. 1.
- I can only assume that the OWS for the east end fueling stand was removed during the decommissioning and removal of the aboveground storage tank, as no evidence of the OWS or discharge lines can be seen leading to the lagoon.
- It does appear that the Town of Hornepayne has a surface water sewer that discharges to Lagoon No. 1. The sewer line appears to come from the southwest extent of West End Road. I can only assume that prior to the

- lagoon's construction this town sewer line drained directing into Little Jackfish River and transected through the area of the lagoon.

Based on the available information on Lagoon No. 1, to my knowledge, the only current influent from CN property to the lagoon is surface water drainage. Honestly, I'm not sure why CN didn't backfill the lagoon following the removal of the East End fueling system, maybe cost, and reconnected the Town of Hornepayne's storm sewer. As such, I do not believe due to the nature of the influent/effluent from Lagoon No. 1 requires that the current ECA for the Site be amended to include the addition of the Outfall from Lagoon No. 1 to Little Jack Fish River. If you require CN to work with the Town of Hornepayne to backfill the lagoon and reconnect the Town's storm sewer please let me know.

Bunkhouse Emergency Generator Provincial Registration:

As we discussed during the Site inspection, I contacted the CN Real Estate Group and have confirmed that the CN Hornepayne Yard's Bunkhouse is located on CN owned land, located between West End Road and Front Street, please see the attached figure. Please note that the dark red line is the CN property ownership. As we discussed, since the associated emergency generator is also located on that parcel, it would not fall under the provincial requirement to be registered. In good faith while awaiting confirmation from CN Real Estate, I did attempt to start the registration process, however, was denied after several attempts to input CN's business license number.

In summary, based on the information provided above, at this time I do not believe that there are any outstanding issues to be addressed at the yard, whether those are or are not associated with the ECA. In addition, I would like to highlight that based on the historic analytical results collected to-date as required under the ECA, we have had no exceedances from the yard into Little Jack Fish River for a considerable amount of time. As such, in accordance with the ECA, I would request and very much appreciate that you reconsider your involvement in reviewing the data and working with Arcadis, CN and the MOECC approvals branch to fairly evaluate a potential reduction in sampling frequency. CN is committed to addressing any and all issues at the Site and over the course of the next year, I'm looking forward to providing the MOECC with a new innovative approach to addressing any remaining site impacts within Hornepayne Yard.

If you have any questions please let me know.

Arcadis has been in contact with the MOECC approvals branch and is planning on setting up a preliminary meeting to discuss the ECA. Likely to take place in September, once everyone is back from vacation. They have informed the approvals branch that you are also involved with the project and that any communication should be provided for your review and consideration.

Thank you.

Aaron

Aaron Stadnyk, P.Eng
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CN Environment
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Aaron.Stadnyk@cn.ca

From: Crosson, Kirk (MOECC) [<mailto:Kirk.Crosson@ontario.ca>]
Sent: Monday, July 20, 2015 11:56 AM
To: Aaron Stadnyk

Cc: Yousry.Hamdy@arcadis.com; Kondrat, Todd (MOECC); Dorscht, Ron (MOECC)
Subject: FW: Hornepayne CN - ISW request for meeting to reduce monitoring

Hi Aaron

Yousry Hamdy has contacted the Ministry about the CN Hornepayne ISW monitoring. I am forwarding the reply that was provided.

From: Crosson, Kirk (MOECC)
Sent: July-20-15 10:34 AM
To: Yousry.Hamdy@arcadis.com; Kondrat, Todd (MOECC)
Cc: Dorscht, Ron (MOECC)
Subject: Hornepayne CN - ISW request for meeting to reduce monitoring

Hi Yousry

In the last site inspection of the Hornepayne CN rail yard, there were unapproved industrial sewage work, air discharge (gen-set) and a contaminated soil waste disposal/treatment site located at the property. The company was requested to make a submission on these items, which are currently all over due. As the additional sewage works need an application submission, and approval and there is a considerable amount of lost fuel remaining in the ground at the site, it is the local offices position that is maybe premature in reducing the monitoring program at this location at this time. As part of the Approval Amendment needed for the ISW, the company could include a request for reduction in monitoring in that process/review.

Based on the current amount of outstanding work at this site, a reduction of monitoring frequency is not agreeable at this time.

Thank you for your enquiry

Kirk Crosson
Ontario Ministry of the Environment & Climate Change

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AL HP FR 410

Crosson, Kirk (MOECC)

From: Crosson, Kirk (MOECC)
Sent: November-25-15 9:08 AM
To: 'Aaron Stadnyk' (Aaron.Stadnyk@cn.ca)
Subject: Hornepayne Yard

CN.

Hi

I am following up on your August 13 email, can you please provide an action plan and work schedule for the decommissioning of Lagoon #1 at the Hornepayne Yard.

Thanks