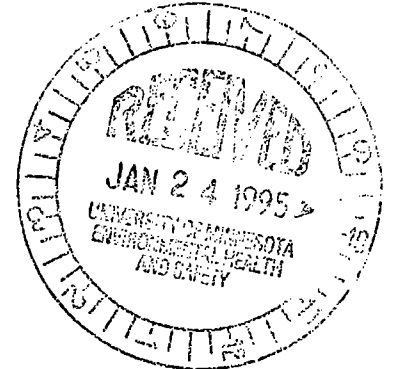


# Minnesota Pollution Control Agency

January 13, 1995

Mr. Donald York  
Environmental Control and Budgets  
Chicago & North Western Transportation Company  
1 North Western Center  
Chicago, Illinois 60606



Dear Mr. York:

RE: Chicago Northwestern Site (Site), Southeast Minneapolis Yards, Minneapolis, Minnesota

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Unit has reviewed Dahl & Associates, Inc.'s "Remedial Action Work Plan for Chicago & North Western Railway Company Southeast Minneapolis Yards" (RA Work Plan), dated October 25, 1994. The RA Work Plan outlines the methods for excavating and stockpiling creosote contaminated soil from a former creosote pit and treating the soil using high temperature thermal desorption and thermal oxidation. The RA Work Plan was modified in telephone conversations between Rod Jasmer and Laure Schaefer of Dahl & Associates, Pat Clegg of Advanced Soil Technologies and Lynne Grigor of the VIC Unit (the Telephone Conversations) that took place through January 10, 1995, based on the results of trenching in the creosote pit area and shakedown of the thermal treatment unit.

Based on the Telephone Conversations, it is the understanding of the VIC Unit staff that the primary unit of the treatment system will be run at about 1150 to 1200 degrees Fahrenheit with a feed rate of about 25 to 30 tons per hour, and the secondary unit will operate at a temperature sufficient to meet the MPCA Air Quality Division requirements for stack emissions. The required cleanup concentrations will be based on a pile by pile basis (300 tons per pile) using the MPCA health risk evaluation spreadsheet for polynuclear aromatic hydrocarbons (PAHs). This method was used to calculate the site cleanup goal mentioned in a July 25, 1994, letter to you from Lynne Grigor. The Site cleanup goal was a worst case scenario and the pile by pile cleanup concentrations will more accurately reflect a 1 in 100,000 risk based on soil ingestion since the ratio of individual PAHs will vary across the Site. Soils which are at or less than the pile by pile cleanup concentrations will be allowed unrestricted use.

Based on a review of the RA Work Plan and the Telephone Conversations, the Response Action Plan (RA Plan) is hereby approved pursuant to Minn. Stat. § 115B.17, subd. 14 (1992).

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This letter is subject to the disclaimers found in Attachment A. Please note that the RA Plan approval only covers the creosote pit area on the property and not the entire Chicago Northwestern Site (a.k.a. the former Republic Creosoting Site). Any assurance letters issued by the MPCA based on the completion of the RA Plan will not include the remainder of the former Republic Creosoting Site. In order to receive an assurance letter for the entire Site, additional investigative work and cleanup will be necessary as outlined in a letter from the MPCA to you, dated May 28, 1992. The condition of the soils in the excavation walls indicate that while the creosote pit has been completely removed, a thin band of soil contaminated with PAHs, exists over much of the areal extent of the Site and needs remediation. In addition, temporary wells have indicated that ground water contamination by PAHs exists beneath the Site. It is the understanding of the VIC Unit staff that the Chicago and North Western Transportation Company is requesting a No Action Letter for only the creosote pit area at this time.

If you have any questions concerning the information in this letter, please contact Lynne Grigor at (612) 296-8572 or Jerry Stahnke at (612) 297-1459.

Sincerely,



Kenneth M. Haberman  
Unit Supervisor  
Voluntary Investigation and Cleanup Unit  
Site Response Section  
Ground Water and Solid Waste Division

KMH:jlh

cc: Rod Jasmer, Dahl & Associates  
Gordon Girtz, University of Minnesota  
Kirk Shellum, Advanced Soil Technologies  
Karen Nordby, Minneapolis Department of Inspections  
Tom Greenland, Chicago & North Western Railway Company  
Sarah Halvorson, Lindquist & Vennum  
Jim Bratina, Reilly Industries, Inc.