STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway • Coeur d'Alene, Idaho 83814 • (208) 769-1422

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

July 18, 2008

Chuck Saylors
Union Pacific Railroad
1400 Douglas Street
Mail Stop 1580
Omaha, NE, 68179

Subject: Proposed Union Pacific Railroad Abandonment – Coeur d'Alene Industrial Lead

Dear Mr. Saylors:

This letter is in response to your July 1, 2008 letter requesting assistance in identifying any potential environmental affects from the abandonment of the Coeur d'Alene Industrial Lead rail line from M.P. 7.5 to M.P. 8.79 in Coeur d'Alene, Idaho. It appears that this section is a continuation of the same rail line that was formally abandoned from mile post 7.5 to 2.25 in 2004/2005. The Department of Environmental Quality (DEQ) submitted comments to Union Pacific on that abandonment in a June 15, 2004 letter. Many of DEQ's concerns are the same for this section and are reiterated below.

The rail line passes by residential neighborhoods and industrial areas in Coeur d'Alene. It is readily accessible to the public. After discussions with long time residents of the Coeur d'Alene area, our understanding is that the line primarily carried forest products to and from lumber mills. Petroleum products were also transported to heating oil distributors and an asphalt plant along the line. Herbicides, used in vegetation control, and spilled petroleum product are potential contaminants in the rail corridor

The Department of Environmental Quality (DEQ) is not aware of any large releases of hazardous materials along the rail line. Based on the potential for petroleum contamination, the long history of this line's operation and our experience with other rail line abandonment projects, DEQ requests that Union Pacific conduct a reconnaissance assessment of the rail bed and adjacent right of way over this segment proposed for abandonment. The assessment should inventory any areas with discolored soils or devoid of vegetation for no apparent reason. The extent of these areas should be mapped. Any areas inventoried should undergo soil testing using a defensible sampling design to establish the nature of any contamination, its extent and maximum concentration values. The type of contamination suspected at any particular site should dictate the constituents sampled and assessed.

Union Pacific should also complete a scientifically supportable random sampling of the grade and right of way to establish the surface and near surface (12 inches) concentrations of petroleum constituents and herbicides. These data should be subjected to a risk based assessment protocol that would guide grade closure alternatives protective of human health and the environment. The Idaho Risk Evaluation Manual is available through the DEQ website at http://www.deq.idaho.gov/Applications/Brownfields/index.cfm?site=risk.htm

Since this section of the rail line is situated along the Spokane River, any abandonment activities such as rail and tie removal should apply best management practices (BMPs) designed to protect the river from nonpoint source pollution. Once installed, these BMPs should be inspected on a regular basis and enhanced if not achieving the desired control of runoff and nonpoint source pollution.

Any area used to temporarily store and/or treat salvaged rails and ties should be situated well away from the river. It should be adequately fenced to restrict public access. Any temporary storage and/or treatment facility situated any place along the rail line will be over the Rathdrum Prairie-Spokane Valley Aquifer, a sole drinking water source for over 450,000 residents in the region. Local critical materials regulations (IDAPA 41.01.01.400) designed for aquifer protection will apply to any associated chemical storage at a storage and/or treatment site. Groundwater protection is required by the Idaho Groundwater Rule (IDAPA 58.01.1 1). Primary and secondary impermeable layers for containment of drainage generated from precipitation on stored rails and ties would be warranted. Adequate measures to collect, isolate and treat any accumulating liquids should be in place. Should tie washing be contemplated on such a site, liquid waste minimization measures would be required in addition to a liquids removal or treatment plan. RCRA regulations may also apply, dependent on any wastes generated.

If you have any questions concerning this response, please direct these to Kreg Beck at 208-769-1422 *or* kreg.beck@deq.idaho.gov.

Sincerely,

Daniel Redline
Regional Administrator

c: Toni Hardesty, Director, DEQ
Rosie Alonzo, DEQ – Assignment 39135
Kreg Beck, CDA DEQ
June Bergquist, CDA DEQ