

**State of Vermont**  
**Department of Environmental Conservation**  
**Waste Management and Prevention Division**  
**103 South Main Street/West Building**  
**Waterbury, VT 05671-0404**  
**(802) 479-8767**  
**Chuck.schwer@state.vt.us**

December 10, 2012

Stella Karnis  
Sr. Manager, Environmental Affairs  
CN  
935 de la Gauchetiere West, 12th Floor  
Montreal, Quebec, H3B 2M9

Re: CV Railway (site#770126), St.Albans City

Dear Ms. Karnis:

The VT Department of Environmental Conservation, Waste Management and Prevention Division, Sites Management Section (SMS) has reviewed the C.V. Railways, Inc. hazardous site file, including the September 2012 Arcadis Well Abandonment report. Following review of the site file, the SMS has made the following conclusions:

- In June 1990, the State of VT and Central VT Railway signed a Partial Consent Order that required environmental contamination to be characterized and a remedial system to be installed and operated.
- Sources of separate phase petroleum product were identified and removed, contaminated soils were excavated, and a system constructed to collect fuel dripping from locomotives onto tracks was constructed and put into operation.
- A groundwater recovery remediation system was constructed on site and operated continuously from 1997 through 2005. The recovery system removed contaminated groundwater and petroleum product from the subsurface.
- The recovery system was shut off in 2005 and the recovery system was monitored for possible rebound through July 2011 when permanent closure of the recovery system as approved by the SMS in November 2010 was conducted.



- Eleven stockpiles of contaminated soils that originated during site remediation activities in the 1990's were present on site. By 2011, most of the soils met SMS criteria for thin-spreading on site and were spread under a work plan approved by the SMS. Approximately 4.5 tons of soils not suitable for thin spreading, as well as plastic sheeting and tires were sent to the Coventry landfill for disposal.
- Following soil thin spreading, the area was re-vegetated.
- Arcadis, acting as the environmental consultant for CN conducted an analysis transmissivity of the geologic matrix to the remaining heavily weathered petroleum free product and assessed the ability of absorbent "socks" to remove significant amounts of the remaining free product. The transmissivity analysis indicated that the aquifer is no longer transmissive to the separate phase petroleum. Analysis of the amount of product removed by the "socks" demonstrated the lack of transmissivity to the separate phase petroleum.
- Long term groundwater monitoring demonstrates that no groundwater with contamination present in concentrations exceeding groundwater enforcement is migrating off site.
- Groundwater at the site was reclassified Class IV in January, 2012.
- Monitoring wells were abandoned in 2012 under a work plan approved by the SMS.
- Contamination remaining on site relating to a more recent release from a 50,000 gallon above ground storage tank has been identified. This is being managed as a separate site (Site # 20124257).

Based on the above, the SMS is assigning this property a Site Management Activity Completed (SMAC) designation. The SMAC designation will not release the owner(s) of the property from any past or future liability associated with the petroleum contamination at the site. It does, however, mean that the SMS is not requesting any additional work in response to the contamination detailed in the 1990 Partial Consent Order.

Sincerely,



Chuck Schwer, Section Chief  
Site Management Section