



State of Utah

Department of
Environmental Quality

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May 24, 2006

ERRC-114-06

HEI-2100
DAW

Surface Transportation Board
Case Control Unit
Attn: Diana Wood
Washington, DC 20423

Re: Environmental Assessment, STB Docket No. AB-33 (Sub-No. 237X), Union Pacific Railroad Company and Salt Lake City Corporation Abandonment Exemption

Dear Ms. Wood:

The Utah Department of Environmental Quality (UDEQ), Division of Environmental Response and Remediation (DERR) and Division of Water Quality (DWQ) has reviewed the Environmental Assessment, STB Docket No. AB-33 (Sub-No. 237X) regarding an Abandonment Exemption for the abandonment of the Union Pacific Railroad Company's 900 South Line in Salt Lake City, Utah. Based on the review of the document, the UDEQ has only one specific comment and three general comments regarding the project. The comments follow below:

General Comments

1. The Environmental Assessment does not indicate any material will be discharged to a surface water body as a result of project related activities. A UPDES permit may be necessary for this project if material will be discharged to a surface water body such as the Jordan River. UPDES issues and concerns should be coordinated with the DWQ.
2. The DERR has no concerns with the activities to be conducted during the reclamation of the rail line as the project activities are not expected to generate hazardous materials or wastes. However, if such wastes are generated or encountered during the course of the project, the DERR requests to be informed so that proper response actions may be taken. The DERR may be reached at (801) 536-4100.
3. While the activities described in the Environmental Assessment do not pertain directly to, but are contingent on the track realignment at Grant Tower, the DERR requests to be informed and updated on the work occurring at Grant Tower. The DERR has an interest in activities in the Grant Tower area because a former National Priorities List (NPL) site, UP&L American Barrel is

located there and the realignment activities have the potential to expose workers to hazardous materials and potentially degrade the protectiveness of the remedial strategies employed at the site. Please contact Joe Katz at (801) 536-4104 for information or questions regarding the Grant Tower area.

Specific Comments

4. The DWQ requires a stormwater protection permit for construction/demolition activities that disturbs more than 1 total acre of ground surface. Based on the length of the railroad corridor to be reclaimed, this permitting requirement may apply to the project. An activity disturbs the ground surface if it exposes subsurface soils or it promotes erosion of or otherwise destabilizes previously stable surface soils. Based on the project outline presented in the Environmental Assessment, it cannot be determined whether the project activities will disturb the ground surface. For further information regarding permitting requirements or their applicability to this project please contact Tom Rushing at (801) 538-6951. Stormwater protection permits may be obtained online at www.deq.utah.gov.

The UDEQ has no other comments regarding the abandonment of the Union Pacific Railroad Company's 900 South Line. If there are any questions or concerns about the UDEQ's comments, please contact Joe Katz at (801) 536-4104.

Sincerely,



Joseph Katz, Environmental Scientist
Division of Environmental Response and Remediation

JHK/eds

cc: Mike Herkimer, DWQ
Tom Rushing, DWQ
Gary L. Edwards, M.S., Director, Salt Lake Valley Health Department