



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

May 17, 2012

Office of Environmental Analysis
Surface Transportation Board
E Street, S.W.
Washington, DC 20423

Re: Central Railroad Company
Of Indianapolis
Abandonment Exemption
Docket No. AB-511 (Sub-No. 6X)

To Whom It May Concern:

IDEM would like to apologize for the delay in responding to the request for written comments to the Office of Environmental Analysis (OEA) regarding the Abandonment Exemption for 2.84 miles of railroad in Kokomo, Howard County, Indiana for the Central Railroad Company of Indianapolis (CERA). Unfortunately, this request was late in getting to our section.

To IDEM's knowledge there are no existing hazardous waste sites or hazardous materials spills in the railroad right-of-way along the 2.84 miles of CERA's Tipton Industrial Lead that would change the response to 7(iii) in the Environmental Report dated April 5, 2012. This area has a mix of industry, residential and agricultural uses, but is dominated by agriculture. Historically there have been four hazardous material spills within one-eighth of a mile of the Tipton Industrial Lead, and three petroleum-based locations with leaking underground storage tanks (see attached Facility and Spill/Incident Locations Map).

- Unapproved septic systems were hooked to storm water drains
- Transformer oil was spilled but did not impact water resources
- Nitrogen oxide was released at a natural gas equipment area
- Diesel fuel was spilled but did not impact water resources
- A Gas America station had a leaking underground storage tank
- A Bigfoot Amoco station had a leaking underground storage tank
- A Kocolene Oil Corp station had a leaking underground storage tank

Five additional spills and one more underground storage tank site were located within one-quarter miles of the Tipton Industrial Lead.

- Unapproved septic systems were hooked to storm water drains
- Acetic acid solution was spilled but did not impact water resources

- Process settling wastewater was spilled at a pottery facility
- Sanitary sewage was allegedly bypassing a lift station to a field
- Sandblasting sand was left over a 100 ft² area
- An additional underground storage tank is located in this zone but has not leaked

Each of the above spills and leaking underground storage tanks were remediated and no longer pose a threat to the environment or public health.

IDEM would like to caution CERA and OEA about the potential for residual contamination of the railroad bed after the rails and crossties have been removed. Railroad crossties are known to be frequent sources of arsenic (As) and Pentachlorophenol (PCP) to the environment. The abandonment of the Tipton Industrial Lead should address these potential concerns.

Thank you for your concern about the abandonment of the Tipton Industrial Lead. Please feel free to contact IDEM if you have any further questions about this issue.

Sincerely,



Ross A. Brittain, PhD
Senior Environmental Manager
Site Investigations Section
Office of Land Quality
317-234-0345
rbrittai@idem.in.gov

cc: Melanie Yasbin