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Project/File: 111477564

Regan Schafer-Frentz, P.Eng., Specialist Environmental Remediation,
CPKC Railway
7550 Ogden Dale Road SE
Calgary AB T2C 4X9

Dear Regan Schafer-Frentz,

**Reference: Recommendations Relating to the 2024 Groundwater Monitoring and Sampling Program
in Former Scrap Yard and Fueling Areas Within the CPKC Railway's Weston Yard,
Winnipeg, Manitoba**

Stantec Consulting Ltd. (Stantec) is pleased to provide the following recommendations letter to CPKC Railway (CPKC) for the CPKC Weston Yard in Winnipeg, Manitoba (hereinafter referred to as the "Site").

Background

In April 2024, CPKC retained Stantec to complete a groundwater monitoring and sampling program (GW MSP) at the former scrap yard and fueling areas within the CPKC Weston Yard situated in Winnipeg, Manitoba. Stantec's activities and findings were documented in the letter to CPKC dated September 24, 2024¹. The recommendations stemming from this work are being provided herein. The recommendations made herein are subject to the limitations included in the Limitations section of this letter and are to be read in conjunction with the July 2024 program summary letter.

A Site Management Plan for the Site was submitted to and approved by Manitoba Environment and Climate (formerly Manitoba Conservation and Climate) in 2015, relating to the reported soil and groundwater concentrations exceeding applicable guidelines. The approved Remediation Plan recommended the completion of an annual monitoring well inventory or condition check of the installed and accessible wells and completion of a monitoring and sampling program of the installed monitoring wells every three years.

Manitoba Conservation and Climate approved the Plan and Stantec completed a monitoring well inventory in 2016 and 2017 and indicated that the wells on Site were in good condition.

Stantec completed a groundwater monitoring and sampling program in June 2018, which included the monitoring and sampling of 10 of the 12 previously installed monitoring wells. The concentrations of benzene, toluene, ethylbenzene, xylenes (BTEX), petroleum hydrocarbon (PHC) fractions F1-F4, polycyclic aromatic hydrocarbons (PAHs), and dissolved metals in the submitted groundwater samples were less than the selected guidelines, except for the PHC F3 concentration in the groundwater sample collected at

¹ Stantec. 2024. Groundwater Monitoring and Sampling Program in Former Scrap Yard and Fueling Areas Within the CPKC Weston Yard, Winnipeg, Manitoba. July 21, 2024.

Reference: Recommendations Relating to the 2024 Groundwater Monitoring and Sampling Program in Former Scrap Yard and Fueling Areas Within the CPKC Railway's Weston Yard, Winnipeg, Manitoba

monitoring well MW07 in the location of the Smaller Scrapping Area, which marginally exceeded the selected guideline value.

Stantec completed a monitoring well inventory at the Site in 2019. In addition, monitoring wells MW01 and MW11 were decommissioned within the area of the Former Trailer and Chemical Storage Area and replaced by monitoring well MW19-01. Monitoring well MW19-01 was subsequently monitored and sampled. The concentrations of BTEX, PHC F1-F4, PAHs, and dissolved metals in the groundwater sample were less than the applicable guidelines.

Stantec completed a monitoring well inventory of the 11 existing monitoring wells at the Site in 2020. No groundwater monitoring wells were sampled in 2020 (in accordance with the approved Remediation Plan). An increase in work activity and re-grading was noted at the Site in 2020 and two of the monitoring wells (MW06 and MW12) could not be located. A third monitoring well (MW05) was determined to be situated beneath a pile of rail ties and was inaccessible during this event.

Stantec completed a groundwater monitoring and sampling program in June 2021 (Stantec, 2021), which included the monitoring and sampling of the previously installed 11 monitoring wells (MW02 through MW09, MW12, MW13, and MW19-01) on the Site. Of the 11 monitoring wells, eight monitoring wells were located during the inventory. The concentrations of BTEX, PHC F1-F4, PAHs, and dissolved metals in the eight located monitoring wells were less than the applicable guidelines.

Stantec completed a monitoring well inventory and condition check of the 11 existing monitoring wells in 2022 (Stantec, 2022). In addition, MW12A (replacement monitoring well for MW12) was installed and the protective casings of monitoring wells MW05 through MW09 and MW13 were converted from flush-mounts to monuments in 2022.

Stantec completed a monitoring well inventory, elevation survey and monitor of the 11 existing monitoring wells installed at Site in June 2023 (Stantec, 2023). Each of the 11 monitoring wells was located during the inventory and were found to be in generally good condition; however, it did appear that MW05 had been struck by a vehicle but was still serviceable.

Stantec completed a groundwater monitoring and sampling program in May 2024, which included the monitoring and sampling of the previously installed 11 monitoring wells on the Site. Of the 11 monitoring wells, 10 monitoring wells were located during the inventory. The concentrations of BTEX, PHC F1-F4, PAHs, and dissolved metals in the 10 located monitoring wells were less than the applicable guidelines.

Recommendations

Based on the laboratory results at the Site since 2015, the concentrations of petroleum hydrocarbons and regulated metals have shown to be decreasing. Since 2018, the concentrations of BTEX, PHC F1-F4 and regulated metals have been below the applicable guidelines with the exception of monitoring well MW7, that reported a marginal exceedance of PHC F3 in 2018. Since 2015, the concentrations of PAHs have been below the applicable guidelines at each of the 11 monitoring wells on Site. Additionally, light non-aqueous phase liquid (LNAPL) has not been observed during the purging and sampling of the monitoring wells. It is noted that monitoring well MW4 was not located in 2024; however, concentrations above applicable guidelines were last measured at this sampling location in 2013. In 2013, a marginal PHC F3 exceedance was reported at MW4 (i.e., 670 µg/L above an applied guideline value of 500 µg/L); however, in the four

Reference: Recommendations Relating to the 2024 Groundwater Monitoring and Sampling Program in Former Scrap Yard and Fueling Areas Within the CPKC Railway's Weston Yard, Winnipeg, Manitoba

subsequent sampling events completed at MW4 between 2014 and 2021, PHC groundwater analytical concentrations (including PHC F3) were reported below laboratory reportable detection limits and applicable guidelines.

Based on the rationale provided above and supported by the data presented within the 2024 GWMSP, Stantec recommends that the annual groundwater sampling program be discontinued and the monitoring wells on Site be decommissioned by a licensed technician.

Limitations

This Recommendations Letter has been prepared for the sole benefit of CPKC and may not be used by any other person or entity without the express written consent of Stantec Consulting Ltd.

No other representations, warranties or guarantees are made concerning the accuracy or completeness of the data or conclusions contained within this letter or the source document, including no assurance that this work has uncovered all potential liabilities associated with the identified property.

This letter provides an evaluation of selected environmental conditions associated with the identified portion of the property that was assessed at the time the work was conducted. There are no assurances regarding the accuracy and completeness of this information. All information received in the preparation of this letter has been assumed by Stantec to be correct. Stantec assumes no responsibility for any deficiency or inaccuracy in information received from others.

The opinions in this letter can only be relied upon as they relate to the condition of the portion of the identified property that was assessed at the time the work was conducted. Activities at the property subsequent to the assessments may have significantly altered the property's condition. Stantec cannot comment on other areas of the property that were not assessed.

This letter has been prepared for the exclusive use of the client identified herein and any use by any third party is prohibited. Stantec assumes no responsibility for losses, damages, liabilities or claims, howsoever arising, from third party use of this plan.

The locations of any utilities, buildings and structures, and property boundaries illustrated in or described within this report, if any, including pole lines, conduits, water mains, sewers and other surface or sub-surface utilities and structures are not guaranteed. Before starting work, the exact location of all such utilities and structures should be confirmed and Stantec assumes no liability for damage to them.

The conclusions are based on the site conditions encountered at the time the work was performed at the specific testing and/or sampling locations, and conditions may vary among sampling locations. Due to the nature of the investigation and the available data, Stantec does not warrant against undiscovered environmental liabilities nor that the sampling results are indicative of the condition of the entire site. As the purpose of this letter is to recommend the termination of the approved Remediation Plan based on environmental risk; the identification of non-environmental risks to structures or people on the site is beyond the scope of this assessment.

Should additional information become available which differs significantly from our understanding of conditions presented in this plan, Stantec specifically disclaims any responsibility to update the plan.

**Reference: Recommendations Relating to the 2024 Groundwater Monitoring and Sampling Program in Former Scrap Yard and Fueling Areas
Within the CPKC Railway's Weston Yard, Winnipeg, Manitoba**

If you have any questions or concerns, please do not hesitate to contact us.

Regards,

STANTEC CONSULTING LTD.



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