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Metro-North Railroad

**ENVIRONMENTAL COMPLIANCE
REVIEW FINAL REPORT**

North White Plains Railroad Yard

Task I

Contract No. 9215

7 May 1999

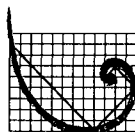
Prepared For:

**Metro-North Railroad
347 Madison Avenue
New York, New York 10017**

Prepared By:

**ERM
475 Park Avenue South, 29th Floor
New York, New York 10016**

**M306-10-08/9215-1.5
ERM-415**



ERM

ERM-NORTHEAST, INC.

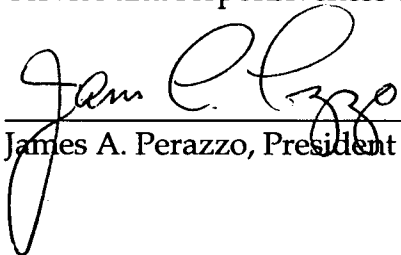
COMMITMENT TO QUALITY

We will fully understand and document our clients' requirements for each assignment.

We will conform to those requirements at all times and satisfy the requirements in the most efficient and cost-effective manner.

Our quality policy and procedures include an absolute commitment to provide superior service and responsiveness to our clients.


John A. DeFilippi, Chairman


James A. Perazzo, President



Metro-North Railroad

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7 May 1999

Ms. Katherine Hudson, Esq.
Assistant Regional Attorney
Division of Environmental Enforcement
New York State Department of Environmental Conservation
21 South Putt Corners Road
New Paltz, New York 12561-1696



Mr. John Seaboldt
Deputy Director, Facilities Engineering
Metro-North Commuter Railroad Company
420 Lexington Avenue, 11th Floor
New York, New York 10017

RE: Environmental Compliance Review
Final Report for North White Plains Railroad Yard
Contract No. 9215, Environmental Studies at Major Rail Yards
M306-10-08/9215-1.5
ERM-415

Dear Ms. Hudson and Mr. Seaboldt:

Enclosed please find a copy of the Environmental Compliance Review (ECR) Final Report for the North White Plains Rail Yard located in North White Plains, New York. This document was prepared by ERM-Northeast, Inc. in accordance with the requirements outlined in the Memorandum of Understanding executed on 24 July 1994 between Metro-North Railroad and the New York State Department of Environmental Conservation.

If you have any questions regarding the information presented in the ECR Final Report, please contact me at (315) 445-2554.

Sincerely,

Richard A. Schulman
Senior Project Manager

cc: Al Klauss (NYSDEC) 2 Copies

**John Iannotti (NYSDEC)
Karen L. Timko, Esq. (MNRR)
Ken McHale (MNRR)
Geoffrey Dopsch (MNRR)
Lazelle Williams (MNRR)
Laura Truettner (ERM)**

Environmental Compliance Certification

The audit described in this report was performed in accordance with the Memorandum of Understanding between the New York State Department of Environmental Conservation and Metro-North Commuter Railroad Company dated July 23, 1994, the approved scope of work, and standard environmental audit practices. Consistent with Article I, Section 12, item (ii) of the Memorandum of Understanding, ERM-Northeast, Inc. certifies that within the scope of work performed by ERM-Northeast, Inc., in its professional opinion, with the exception of the instances of known and suspected noncompliance identified in this report, the North White Plains Railroad Yard (the "Site") is in compliance with all federal and state statutory and regulatory requirements identified in Table 1-1 of this report. The scope of work was limited to an on-site review of existing work practices and the collection and interpretation of existing documents and this information was used to determine the status of compliance with the above referenced requirements.



Howard D. Wiseman, P.E.
Principal, ERM-Northeast, Inc.

5/6/99

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1.0 INTRODUCTION

1.1 BACKGROUND AND OBJECTIVE

ERM-Northeast, Inc. (ERM), on behalf of Metro-North Railroad (Metro-North), has prepared this Environmental Compliance Review (ECR) for the North White Plains Railroad Yard (NWP Yard) located in North White Plains, New York

This report was prepared in accordance with the requirements outlined in the Memorandum of Understanding (MOU) between the New York State Department of Environmental Conservation (NYSDEC) and Metro-North.

The MOU requires Metro-North to select a consultant to review all NWP Yard systems and operations for compliance with the applicable federal and New York State laws, rules, regulations or permits.

ERM conducted a site visit for purpose of the NWP Yard ECR on 17 and 18 June 1996. The objectives of the ECR included the following tasks:

1. An assessment of NWP Yard's compliance with applicable federal and New York State environmental laws;
2. Identification of issues to be addressed in a BMP Plan;
3. Identification of past and present issues that contribute to environmental contamination or the risk of environmental contamination; and

4. Identification of circumstances that may result in environmental contamination or the violation of any federal or New York State environmental law or regulation unless corrective action is taken.

An overview of the actions performed to meet the above objectives is presented in the following sections.

1.2 *ENVIRONMENTAL COMPLIANCE REVIEW APPROACH*

The NWP Yard ECR was geographically limited to the east by North Broadway (NY Rte. 22) and to the west by the Bronx River Parkway. The northern perimeter is approximately even with Parkway Homes Road and to the south by Fisher Lane. The NWP Yard is approximately 25 acres in size and is bisected by Metro-North's Main Harlem Line tracks. The NWP Yard has been in operation since the early 1900's with Metro-North taking over operations in 1983. Between 1986 and 1994, Metro-North made substantial capital improvements to the NWP Yard which included constructing the Maintenance of Equipment and Maintenance of Way facilities and the Communications and Signals Building.

As indicated above, the ECR included an assessment of NWP Yard's compliance with applicable federal and New York State environmental laws, including all relevant statutes, rules, regulations, and permits under the following environmental categories:

- Air Emissions
- Wastewater Discharges
- Solid Waste Management
- Hazardous Waste Management
- Pesticides/Herbicides/Fungicides

- Special Pollutants (i.e., polychlorinated biphenyls)
- Drinking Water
- Petroleum Spill Prevention
- Hazardous Materials Management
- Aboveground and Underground Storage Tank Management

Table 1-1 details the federal and New York State environmental laws and regulations that were included in ERM's assessment of the NWP Yard.

An objective of the ECR task included the identification of issues to be addressed in the BMP Plan, and recommendation of appropriate BMP measures.

Accordingly, ERM has: 1) identified petroleum, toxic and hazardous pollutants used on site; 2) identified NWP Yard locations where the pollutants are used, stored, or handled; and 3) evaluated the potential for the release of significant amounts of the pollutants. In areas where the potential for release is significant, ERM has recommended BMPs. BMPs include administrative activities, such as establishment of procedures, training, preventive maintenance measures, and/or structural measures, such as construction of secondary containment devices. The BMPs developed in connection with the NWP Yard ECR will be amended and incorporated into the Best Management Practices Plan to be provided to fulfill other obligations of the MOU.

1.3

ENVIRONMENTAL COMPLIANCE REVIEW ACTIVITIES

ERM completed the above objectives by performing:

- an assessment of the NWP Yard;
- an on-site and off-site review of NWP Yard records;

- an analysis and evaluation of NWP operations; and
- development of a written report.

The NWP Yard Team conducted detailed assessments based on the specific directions contained in the Environmental Investigative Guidelines for the NWP Yard.

The Yard Team included a Team leader, an air compliance specialist, a regulatory compliance specialist and BMP specialist and a management systems assessor. Each Team member was assigned specific areas of responsibility.

The NWP Yard Team members were:

Environmental Compliance:	Richard Schulman
	Peggy Morocco
	Doug Wolf

Best Management Practices:	John Iannone
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Environmental Management Evaluation:	Melissa Dubinsky
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During the course of the NWP Yard Teams' site visit, information necessary to complete the scope of not only the ECR, but the Environmental Management Evaluation and the BMP Plan, was collected.

The agenda of activities followed during the site visit was as follows:

- Opening Conference
- Daily Scheduling Meeting

- Initial Site Tour
- Review of Operations, Practices and Policies
- Review of Documents
- Interviews with Facility Personnel Regarding Present and Previous Operations, Practices and Policies
- Subsequent Site Tour and/or Review of Specific Areas or Operations of Concern
- Debriefing Session

The purpose of the Opening Conference was to discuss the scope of objectives of the NWP Yard assessment. The Opening Conference also allowed the Team to finalize the agenda, as well as schedule and allocate personnel for the planned on-site activities (e.g., identification of appropriate facility personnel for interviews; review of pertinent environmental issues; scheduling of facility tours, and review of documentation, engineering drawings, and permits).

Additionally, meetings were held with Metro-North personnel on an as-needed basis not only to ensure that the productivity of the NWP Yard Teams' on-site time was maximized, but also to ensure that NWP Yard operations were not disrupted.

After the initial Opening Conference, the team members toured the NWP Yard's facilities. The initial site tour provided the opportunity for each member of the NWP Yard Team to assess operations at the NWP Yard as they relate to their areas of responsibility.

Mr. Thomas Lee of the NYSDEC was present during the site visits and attended the debriefing session.

Following completion of the initial facility tour, the team members worked independently in their specific areas of responsibility. Each team member worked one-on-one with designated NWP Yard personnel, as appropriate, examined operations in detail and reviewed applicable files containing engineering drawings, reports, environmental permits, monitoring data, and written programs, policies and procedures. Records associated with the NWP Yard that were available were reviewed. Documents included:

- Waste Manifests
- Waste Classifications
- Annual Hazardous Waste Generator Reports
- Spill Plans
- Emergency Response Plans
- Reports of Regulatory Agency Visits/Inspections
- Training Programs and Documentation
- Site Plans (current and historical)
- Environmental Policies and Procedures

The NWP Yard Team members conducted interviews of facility personnel to obtain additional information regarding current and past environmental operations, practices, policies and procedures.

Regularly scheduled meetings were held with Metro-North during the ECR to keep Metro-North personnel apprised of the NWP Yard Team's progress.

Immediately following the on-site yard assessment the NWP Yard Team further evaluated; 1) the compliance status of all environmental systems and programs with respect to applicable regulatory requirements, 2)

potential BMP issues, and 3) issues that have or may have caused contamination and/or regulatory violations.

TABLE 1-1
FEDERAL AND STATE LAWS, RULES AND REGULATIONS

AIR EMISSIONS

Federal Requirements

Clean Air Act Amendments of 1990:

- 40 CFR 50, Primary and Secondary National Ambient Air Quality Standards
- 40 CFR 51 and 52, Prevention of Significant Deterioration of Air Quality (PSD)
- 40 CFR 60, New Source Performance Standards
- 40 CFR 61 and 63, National Emission Standards for Hazardous Air Pollutants
- 40 CFR 70 and 71, Operating Permit Program
- 40 CFR 81, EPA Regulations Designating Areas for Air Quality Planning
- 40 CFR 82, EPA Regulations Pertaining to the Protection of Stratospheric Ozone

State Requirements

New York Environmental Conservation Law:

- Article 19, Air Pollution Control
- Article 37, Chlorofluorocarbon Compounds

New York Air Pollution Control Regulations Parts 200 through 211 and 223 through 254 (6 NYCRR 200-211 and 6 NYCRR 223-254)

New York Ambient Air Quality Standards Part 256 and 257 (6 NYCRR 256 & 257)

WASTEWATER DISCHARGES

Federal Requirements

Clean Water Act, Public Law 92-500:

- 40 CFR 122, National Pollutant Discharge Elimination System (NPDES)
 - Permitting
- 40 CFR 403, General Pretreatment Program
- 40 CFR 405 through 471, Categorical Effluent Limitations

TABLE 1-1 (cont.)
FEDERAL AND STATE LAWS, RULES AND REGULATIONS

State

New York Environmental Conservation Law:

Article 17, Water Pollution Control
Article 37, Substances Hazardous or Acutely Hazardous to Public Health,
Safety or the Environment

New York Water Pollution Control Regulations Parts 608 and 610 through 614 (6
NYCRR 608 & 610-614):

6 NYCRR 608, Use and Protection of Waters
6 NYCRR 610, Certification of Onshore Major Facilities
6 NYCRR 611, Environmental Priorities and Procedures in Petroleum Cleanup
and Removal
6 NYCRR 612, Registration of Petroleum Storage Facilities
6 NYCRR 613, Handling and Storage of Petroleum
6 NYCRR 614, Standards for New or Substantially Modified Petroleum Storage
Facilities

New York regulations on State Pollutant Discharge Elimination system Parts 750
through 758 (6 NYCRR 750-758)

New York Water Classifications and Quality Standards, 6 NYCRR 609 and 700-704

SOLID WASTE MANAGEMENT

Federal Requirements

Solid Waste Disposal Act of 1965:

40 CFR 241, Land Disposal of Solid Waste
40 CFR 243, Storage and Collection of Solid Waste

Resources Conservation and Recovery Act (RCRA) of 1976

Hazardous and Solid Waste Amendments of 1984

TABLE 1-1 (cont.)

FEDERAL AND STATE LAWS, RULES AND REGULATIONS

State

New York Environmental Conservation Law - Article 27, Collection, Treatment and Disposal of Refuse and Other Solid Waste

New York Environmental Conservation Law - Article 40, Hazardous Substances Bulk Storage Act

New York Solid Waste Management Facilities Rules Part 360 (6 NYCRR 360):

New York Used Oil Regulations (6 NYCRR 360-14)

New York Medical Waste Regulations (6 NYCRR 360-10)

HAZARDOUS WASTE MANAGEMENT

Federal

Resource Conservation and Recovery Act of 1976 and the Hazardous and Solid Waste Amendments of 1984:

40 CFR 260, Hazardous Waste Management System: General

40 CFR 261, Identification and Listing of Hazardous Waste

40 CFR 262, Standards Applicable to Generators of Hazardous Waste

40 CFR 268, Land Disposal Restrictions

40 CFR 280, Technical Standards and Corrective Action Requirements for Owners of Underground Storage Tanks

State

New York Environmental Conservation Law - Article 27, Collection, Treatment and Disposal of Refuse and Other Solid Waste

New York General Hazardous Waste Management System Regulations Part 370 (6 NYCRR 370)

New York Identification and Listing of Hazardous Wastes Regulations Part 371 (6 NYCRR 371)

New York Hazardous Waste Manifest System Regulations Part 372 (6 NYCRR 372)

New York Land Disposal Restrictions Regulations Part 376 (6 NYCRR 376)

New York Hazardous Waste Treatment, Storage and Disposal Facility Permitting Requirements Parts 373-1 and 373-2 (6 NYCRR 373-1, 6 NYCRR 373-2)

TABLE 1-1 (cont.)
FEDERAL AND STATE LAWS, RULES AND REGULATIONS

PESTICIDES/HERBICIDES/FUNGICIDES

Federal Requirements

Federal Insecticide, Rodenticide and Fungicide Act (FIFRA):

40 CFR 170 - Worker Protection Standard (for Pesticide Handlers)

State

Title 6, Chapter IV, Subchapter A, Part 325 - Application of Pesticides (6 NYCRR 325)

SPECIAL POLLUTANTS

PCBs - Federal

Toxic Substances Control Act:

40 CFR 761 et. Seq. - Polychlorinated Biphenyls (PCBs) Manufacturing,
Processing, Distribution in Commerce and Use Prohibition

PCBs - State

New York Identification and Listing of Hazardous Wastes Regulations Part 371 (6
NYCRR 371)

New York Hazardous Waste Manifest System Regulations Part 372 (6 NYCRR 372)

TABLE 1-1 (cont.)
FEDERAL AND STATE LAWS, RULES AND REGULATIONS

DRINKING WATER

Federal

Safe Drinking Water Act of 1974:

40 CFR 141 - National Primary Drinking Water Regulations

State

New York Public Water Supply Regulations, 10 NYCRR Part 5, Subpart 5-1

OIL AND PETROLEUM SPILL PREVENTION

Federal

Clean Water Act, Public Law 92-500:

40 CFR 112, EPA Regulations on Oil Pollution Prevention

40 CFR 110, Discharge of Oil

40 CFR 300, National Oil and Hazardous Substances Pollution Contingency Plan

State

New York Oil Spill, Control and Compensation Act (Navigation Law, Article 12)

New York Regulations on Oil Spill Prevention and Control, Title 17, Chapter I, Parts 30 through 32)

New York Regulations on Handling and Storage of Petroleum, 6 NYCRR 613

HAZARDOUS MATERIALS MANAGEMENT

Federal

Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and Superfund Amendments and Reauthorization Act of 1986 (SARA):

40 CFR 302, Designation, Reportable Quantities, and Notification

40 CFR 355, EPA Regulations for Emergency Planning and Notification

40 CFR 370, EPA Hazardous Chemical Reporting and Community Right-to-Know Requirements

40 CFR 372, EPA Toxic Chemical Release Reporting Regulations

TABLE 1-1 (cont.)
FEDERAL AND STATE LAWS, RULES AND REGULATIONS

State

New York Rules on Releases, Registration, and Listing of Hazardous Substances:

- 6 NYCRR 595, Releases of Hazardous Substances - Reporting, Response and Corrective Action
- 6 NYCRR 596, Registration of Hazardous Substance Bulk Storage Tanks
- 6 NYCRR 597, List of Hazardous Substances
- 6 NYCRR 598, Handling and Storage of Hazardous Substances
- 6 NYCRR 599, Standards for New or Modified Hazardous Substance Storage Facilities

UNDERGROUND STORAGE TANKS

Federal Requirements

- 40 CFR 280, EPA Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks

State

New York Regulations on Registration of Petroleum Storage Facilities Part 612, (6 NYCRR 612)

New York Regulations on Handling and Storage of Petroleum Part 613, (6 NYCRR 613)

New York Regulations on Standards for New and Substantially Modified Petroleum Storage Facilities Part 614, (6 NYCRR 614)

2.0 FACILITY PROFILE

2.1 SITE ENVIRONS

The North White Plains (NWP) Yard has been in existence since the early 1900s, and has been operated by Metro-North since 1983.

The NWP Yard is located in North White Plains, Westchester County, New York. NWP Yard is bounded to the east by North Broadway (NY Rte. 22), to the west by the Bronx River Parkway, to the north by the Virginia Road bridge and to the south by Fisher Lane. The total NWP Yard area is approximately 25 acres. The site location is depicted on Figure 2-1.

NWP Yard is divided by Metro-North's Harlem Main Line railroad tracks into two sides, a west side and an east side, as described below.

2.2 WEST SIDE FACILITY OPERATIONS

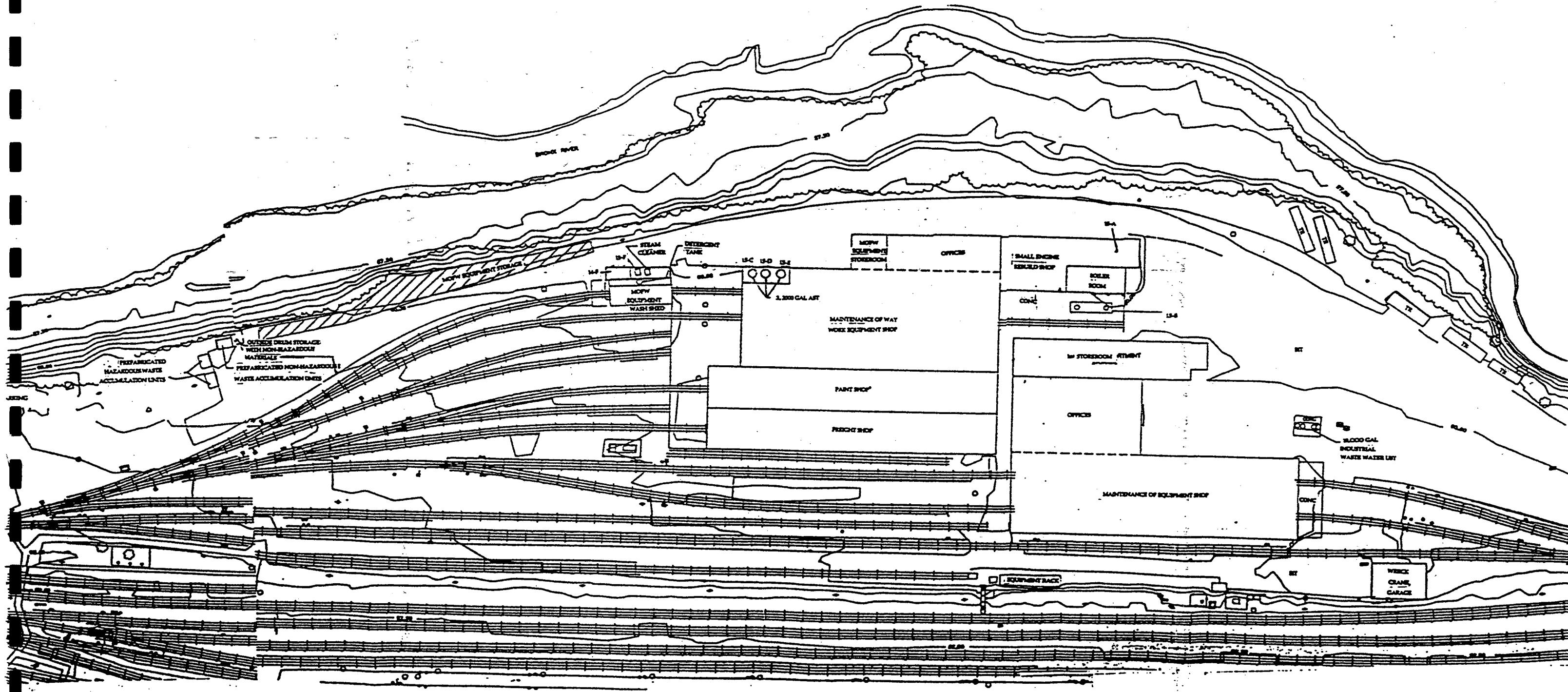
Facilities on the west side include: the Maintenance of Way Building, a 10,000 gallon industrial wastewater underground storage tank, a Maintenance of Way Equipment Wash Shed, an equipment storage area, a 5,000 gallon diesel aboveground storage tank, the Maintenance of Equipment Shop (including a paint shop and freight equipment maintenance shop), sewage collection facilities, indoor and outdoor materials storage, a hazardous and industrial waste accumulation area, power substation, and an old circuit breaker house (currently used as Third Rail Crew Quarters).

FIGURE 2-1

Maintenance of Way Building

The Maintenance of Way (M of W) Building was constructed by Metro-North between 1988 and 1991 as part of a capital improvement project at the NWP Yard. It was constructed in the vicinity of the former electric car shed. Demolition of the electric car shed involved excavation of soils possibly affected by former operations. The operations in this building involve the maintenance and repair of the heavy equipment that is used to maintain Metro-North's 700 miles of track. The building consists of an office area, a central work area that has six small bays on one side and a large open area on the other side, an engine room and a metal fabrication area. Adjacent to the eastern side of the building are the Paint Shop and the Freight Shop. The building is equipped with a series of floor drains that all drain to a 10,000 gallon underground industrial waste water tank that is located on the north side of the Maintenance of Equipment (M of E) Building (Figure 2-2).

Track equipment that needs repair is steam-cleaned in the M of W equipment wash shed and then brought into the M of W building on a track that runs the length of the building. There are several overhead cranes in the central work area that can be used to move equipment. Most of the work in this building involves change out of oil and filters, cleaning and repair of parts. There is also a fabrication area where welding machines, milling machines and lathes are operated. There are two Safety Kleen units and a degreaser tank in the central work area and storage racks for hardware. In a separate room, to the northwest of the central work area, is an engine room where engines are cleaned, rebuilt and tested. There is a hot wash tank containing a solvent in this room




 **CURRENT OPERATIONS
NORTH WHITE PLAINS YARD - WEST SIDE
METRO-NORTH COMMUTER RAILROAD COMPANY**

FIGURE 2-2

and a Safety Kleen unit. The floor drains in this room also discharge to the 10,000 gallon industrial waste water tank.

There are three 2,000 gallon above ground storage tanks in the southwest corner of the building. One contains hydraulic oil, the second contains engine oil and the third contains used oil. Metro-North has installed an automated transfer system for dispensing hydraulic oil and engine oil. Used oil is vacuumed from 55 gallon drums into the used oil tank. The tanks containing hydraulic oil and engine oil are filled by truck. The used oil is vacuumed out by a contracted waste hauler. All three tanks are situated in a bermed area.

Operations in the Paint Shop include preparation of passenger cars for painting by the use of a detergent wash and steam cleaning and the actual spray painting of the cars themselves. Wastes associated with this operation are collected and placed in a designated waste accumulation area.

The adjacent freight shop is used for maintenance and repair of flat cars. The majority of the work is considered "dry repairs", however, some lubricating oils are used as necessary.

There is a boiler room located in the north end of the M of W Building (Figure 2-2). The boiler room was constructed in May 1991 by Metro-North over the location of the former electric car shed as part of the M of W Building construction project. Fuel for the boiler is stored in a 20,000 gallon underground storage tank located to the east of the boiler room, in between the M of W Building and the M of E Building. The tank was installed in 1989 and is described more fully in Section 2.2.14. There are two large air compressors and a small air compressor control system

inside of the building. The blowdown from the compressors and the boiler is discharged to the 10,000 gallon underground industrial waste water tank located to the northeast of the boiler room.

2.2.2 *10,000 Gallon Industrial Wastewater Tank*

As noted above, all of the floor drains from the M of W Building discharge to a 10,000 gallon underground waste water tank located outside on the north side of the M of E Building. The tank also receives rainwater runoff from the yard area outside of the M of W Building. The tank has a leak detection system and level alarm which is located in the M of W office. The tank is periodically gauged manually as a double check on the alarm's accuracy. The tank is vacuumed out every two weeks by a waste hauler. There have been no spills or leaks associated with the tank since its initial installation in 1992.

2.2.3 *M of W Equipment Wash Shed*

The M of W equipment wash shed is located just to the south of the M of W building (Figure 2-2). The wash shed was constructed in 1991 as part of the M of W Building project. There is a set of tracks through the center of the wash shed with trench drains spanning the middle and end of the tracks to capture all wash water. The drains discharge directly to the 10,000 gallon industrial waste water tank. In the room adjacent to the wash area is a 550 gallon aboveground diesel tank. The tank supplies fuel to heat the manual wash unit. There is also an aboveground tank that contains detergent for the wash unit. On the outside of the building is a 5,000 gallon diesel fuel tank that supplies fuel trucks that in turn supply Maintenance-of-Way diesel powered track equipment along Metro-North's right-of-way. This tank is discussed further in Section 2.2.14.

2.2.4 *M of W Equipment Storage*

There are several locations along the western edge of the paved area on the western side of the NWP Yard that are used for M of W track maintenance equipment storage (Figure 2-2). This includes rail maintenance equipment, small backhoes and trench diggers and, at various times, may also include miscellaneous materials such as concrete ties.

2.2.5 *Maintenance of Equipment Building*

The Maintenance of Equipment (M of E) Building Shop is located just to the northeast of the M of W Building (Figure 2-2) and was constructed before the M of W Building between 1986 and 1988. Like the M of W Building, all of the floor drains in the M of E Building discharge to the 10,000 underground industrial waste water tank located on the north side of the building.

The operations in the M of E Shop include: car repairs and modifications, as well as internal car cleaning. The shop contains a materials storage area, a flammable storage area, a welding area and scrap metal bins, as well as locker rooms and offices (on the second floor). The M of E Shop also houses the wreck crews that respond to Metro-North train wrecks and calls from other MTA agencies, the NYC Fire Department, and Conrail.

The Materials Department Storeroom is adjacent to the west side of the

M of E Building and includes an indoor and an outdoor storage area. The indoor storage area is used for storage of spray paint, cleaning supplies, small quantities of oil, transmission fluid, lubricants and replacement parts for mechanical equipment.

The outside storage area is located on the westernmost exterior wall of the Materials Department Storeroom. The outdoor storage area contains a wire cage for compressed gas storage and racks for mechanical equipment storage. ERM also observed a drum storage area which contained: empty drums and standby overpacks on pallets, drums containing virgin oil, ethyl alcohol, Miracle Mike (a detergent) and drums containing spare parts.

2.2.6 *Storm Water*

Storm water runoff from the west side of the NWP Yard discharges to the Bronx River. This includes storm water from the roof drains and the parking lot storm drains. The Bronx River is designated a Class C surface water body along the stretch that is adjacent to the NWP Yard. Class C surface waters are suitable for fish propagation and survival and may be suitable for primary and secondary contact recreation.

2.2.7 *Sewage Collection System*

The sewage collection system for the passenger cars is located on the west side of the NWP Yard, to the east of the M of E Building and adjacent to the main tracks. There is a pump station and a manifold system by which sewage is vacuumed out of the cars. The sewage is subsequently discharged to a main sewer line that ultimately discharges to the City of Yonkers Sewage Treatment Plant. The sanitary wastes from the NWP

Yard also discharge to the City of Yonkers system. The sewage manifold system was constructed between 1987 and 1988 and was put into operation in 1988.

2.2.8 *Prefabricated Waste Accumulation Units*

There are three prefabricated hazardous waste accumulation units located on the western side of the NWP Yard (Figure 2-2). The units have secondary containment and are periodically emptied by a permitted hazardous waste hauler. The units accumulate lead/acid batteries for recycling; combustible materials, sorbents with oil and materials to be characterized which may include paints/thinners from the paint shop, flammable liquids and solvents.

2.2.9 *Outdoor Tie Storage*

Adjacent to the accumulation units is an area where concrete ties are stored on an as-needed basis in support of ongoing track maintenance projects.

2.2.10 *Power Substation B-23*

The traction power substation, which supplies power to the third rail, is located on the southwestern side of the NWP Yard (Figure 2-1). The building was originally constructed in the 1940s as a mercury rectifier substation. In the 1960s, it was converted to a solid state substation. Transformers containing PCBs were replaced in the mid-1980s by two non-PCB mineral oil-filled transformers. One transformer is active and one is on standby.

2.2.11 *Trailers at South End*

South of the power substation on the western edge of the property are a series of trailers that are used by the Third Rail crews as crew quarters (Figure 2-1). Third rail parts are stored adjacent to one of the trailers.

2.2.12 *Signal Generating Substation (S-23)*

The Signal Generating Substation is located between the Power Substation and the Old Circuit Breaker House on the southwestern end of the NWP Yard (Figure 2-2). This building was constructed in 1982 and supplies signal power to the signal system between Mott Haven and Brewster. The transformer located in this building contained PCBs. It was replaced with a dry transformer in 1991.

2.2.13 *Old Circuit Breaker House*

The Old Circuit Breaker House is located at the extreme southern end of the yard and is the oldest structure at the NWP Yard. This building originally contained circuit breakers for the yard signal system. The breakers became obsolete once the line was electrified. It is now used as the Third Rail Crew Headquarters.

2.2.14 *Tanks*

A summary of the existing petroleum bulk storage tanks found at the NWP Yard is found in Table 2-1. A map showing the locations of the tanks are included in Appendix A. There are currently ten petroleum

storage tanks in operation at NWP Yard. The oldest of these tanks was installed in October 1990. All of the tanks currently at the NWP Yard have secondary containment and/or leak detection systems.

2.3 EAST SIDE FACILITY OPERATIONS

East side facilities include: the Yard Office (Train and Engine Building), an automotive fueling facility, the Communication and Signal Building, prefabricated hazardous material accumulation units, and an electrical substation. A detailed description of these facilities and operations at NWP Yard follows. Current operations are depicted on Figure 2-3.

2.3.1 *Train and Engine Building*

The Train and Engine (T and E) Building, designated as the Yard Office on Figure 2-3, is located in the southern end of the east side of the yard. This building was constructed in 1991 and is used as office space by the Yard Master.

2.3.2 *Car Cleaner Quarters*

The crew quarters for car cleaners is located in a small building to the north of the yard office. The building has locker rooms and offices.

TABLE 2-1
SUMMARY OF CURRENT TANKS AT NORTH WHITE PLAINS YARD

Tank ID Number	Date Installed	Location at NWP	AST/UST	Tank Type	Size in Gallons	Contents
13K	10/90	Yard Office	UST	FRP	550	#2 fuel oil
13L	03/91	Vehicle Fueling Pad	UST	FRP	5,000	gasoline
13M	03/91	Vehicle Fueling Pad	UST	FRP	3,000	diesel fuel
13N	1994	C and S Building	UST	FRP	10,000	#2 fuel oil
15B	05/89	M of E Building	UST	FRP	20,000	#2 fuel oil
15C	1992	M of W Building	AST	steel	2,000	waste oil
15D	1992	M of W Building	AST	steel	2,000	hydraulic oil
15E	1992	M of W Building	AST	steel	2,000	engine oil
14F	04/92	M of W Equipment Wash Bldg.	AST	steel	5,000	diesel fuel
15F	04/92	M of W Equipment Wash Bldg.	AST	steel	300	#2 fuel oil

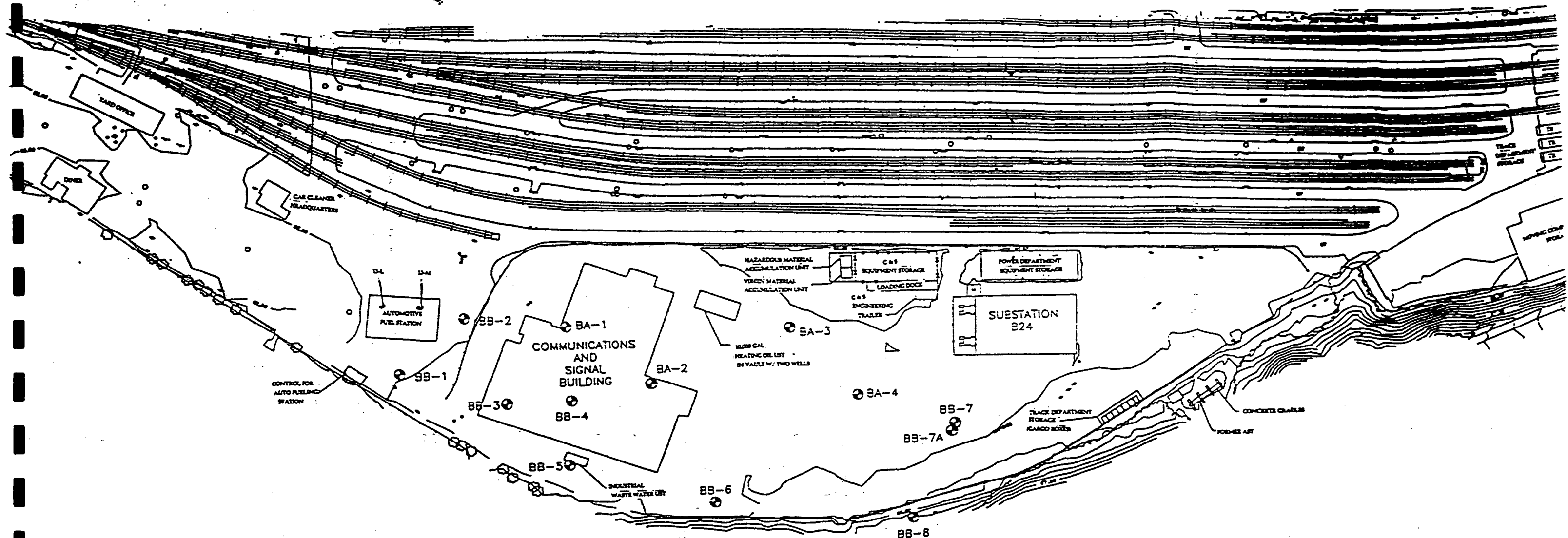
Notes:

FRP: Fiberglass Reinforced Plastic

M of W: Maintenance of Way

M of E: Maintenance of Equipment

C & S: Communications and Signal



CURRENT OPERATIONS
NORTH WHITE PLAINS YARD - EAST SIDE
METRO-NORTH COMMUTER RAILROAD COMPANY

FIGURE 2-3

2.3.3 *Communications and Signal Building*

The Communications and Signal Building was constructed in 1994. The building houses the offices for the Environmental Protection Unit of the Safety Department, a boiler room, the C and S Shop and the C and S Training Center (Figure 2-3).

The boiler room is located on the north side of the building. There are no treatment chemicals used in the boiler and the blowdown is discharged to an 8,000 gallon underground industrial waste water tank located on the east site of the C and S Building. Fuel oil is supplied to the boiler by a 10,000 gallon underground fuel oil storage tank located in the parking lot to the northwest of the building.

The C and S Shop is located on the first floor on the northeast side of the building. All of the floor drains in the shop drain to the 8,000 gallon underground industrial waste water tank. Operations in the shop involve the calibration, maintenance, repair and painting of signal equipment. The shop contains a spray can spray booth with an exhaust system, a parts washer, a sandblaster, a hardware storage room and a flammables storage cabinet.

2.3.4 *Automotive Fueling Facility*

This facility, constructed in 1992, is located just to the south of the C and S Building (Figure 2-3). The facility is comprised of a canopied area with two pumps serving two underground storage tanks. One tank is 3,000 gallons in size containing diesel fuel and the other is 5,000 gallons in size and contains unleaded gasoline. The tanks are double-walled with an interstitial

monitoring system for leak detection. The fueling facility also has a fire suppression system and a self contained intercept drain system.

2.3.5 *Prefabricated Accumulation Units*

Metro-North installed two prefabricated units for hazardous and industrial waste accumulation for the Harlem Line Right-of-Way and virgin material storage for the C and S Department. These units are located to the northwest of the C and S Building, adjacent to the C and S Building outdoor equipment storage area (Figure 2-3). The units have secondary containment and there have been no releases from them. Based on ERM's observations, there have been no impacts to the soil or ground water in the vicinity of these units.

2.3.6 *Substation B-24*

The substation on the east side of the NWP Yard was constructed by Metro-North in 1983. The signal station contains two transformers that are filled with mineral oil.

2.3.7 *Track Department Storage*

There are two areas along the eastern side of the yard property that are used by the Track Department for storage. One area is in the vicinity of the former 20,000 gallon AST and the other is at the far northern end of the work tracks. The storage area near the former 20,000 gallon AST is used for storage of sand, gravel and ties. The second storage area, which is located on the northern end of the work tracks, consists of three trailers.

2.3.8 *Storm Water*

Storm water runoff on the east side of the NWP Yard generally flows into storm drains which discharge to drains located along Fisher Lane.

Ultimately, stormwater discharges to the Bronx River. Storm water infiltration also occurs through the porous pavement in the parking areas located on the east side of the NWP Yard.

2.3.9

Tanks

The status of the tanks on both the east and west side of the NWP Yard was discussed in Section 2.2.14.

2.4

OVERVIEW OF ENVIRONMENTAL ACTIVITIES

Since Metro-North assumed operations at NWP Yard in 1983, they have undertaken a number of capital projects and made improvements to the NWP Yard. In the process of constructing several new facilities, Metro-North has conducted environmental review and generated data which has lead to the identification of two potential areas of environmental concern (AEC). In addition, two reportable spills, constituting potential areas of concern, have occurred at NWP Yard since Metro-North took over operations: one occurred in 1988 when a tank ruptured and the second occurred in 1996 when a drum containing virgin petroleum product fell and released product. A fifth potential AEC was identified by ERM during an August, 1996 site visit. ERM identified the presence of stained soils located adjacent to the westernmost edge of asphalt pavement on the west side of the NWP Yard. The following provides a summary of each of the AECs.

As part of constructing the M of E Building in 1986 and the M of W Building in 1989, Metro-North excavated and characterized several

hundred tons of soil. These soils were found to be non-hazardous, petroleum containing soils and were properly disposed off-site. The petroleum impacts were believed to be minor in nature.

Construction of the C and S Building was initiated in 1992 at the site of the former roundhouse, machine shop, and workmen's lounge.

Roundhouse operations produced discharges to a sanitary ejector manhole and subsequently to the municipal sanitary sewer system in this construction area, though the exact nature of discharges was uncertain.

Extensive characterization of subsurface soil was undertaken. It was determined that operations at the roundhouse had impacted soils on the east side of the yard. These impacts were related both to the use of petroleum and to the use of cleaners/degreasers at and around the roundhouse. Metro-North excavated and disposed between 980 and 1180 tons of soil from the east side of the NWP Yard, in connection with the construction of the C and S Building. While it is unlikely that the soils in this area represent a potential AEC, it cannot be completely eliminated because no ground water sampling and characterization has been conducted.

A spill due to the rupture of a nalgene tank containing industrial waste water (NYSDEC spill number 88-05286) was reported by Metro-North on 19 September 1988. Approximately 1,200 gallons of a mixture of waste oil, gasoline, and anti-freeze was released from this aboveground storage tank. A clean-up was conducted on 7 October 1988, with all excavated soils and absorbents totaling approximately 200 tons, being transported off-site for disposal as a non-hazardous petroleum hydrocarbon contaminated waste. The spill was classified by NYSDEC as "closed" on 2 February 1989.

A spill of virgin petroleum, assigned NYSDEC spill number 96-00180, occurred just south of one of the prefabricated accumulation units on 4 April 1996. Between 20 and 40 gallons spilled out of the drum and, on 5 April 1996, five drums of soil were excavated and a soil sample sent for characterization. Based on the prompt clean-up by Metro-North and preliminary post-excavation soil sample data, it is unlikely that this area will be considered a potential AEC. Review of final soil sample data should occur prior to confirming this.

The last of the five potential AECs is along the bank of the Bronx River on the west side of the NWP Yard. The paved surface area on the western edge of the NWP Yard slopes gently (less than three percent) toward the Bronx River, with storm water runoff directed towards the River. Site visits revealed several stained areas along the pavement edge and adjacent soils probably resulting from oil drips from nearby track repair equipment. While the amount of petroleum product impacting the soil appears small, this area may still represent a potential AEC. Sampling has been recommended by ERM to characterize soil conditions. The installation of a small containment berm has also been suggested.

Ground water data for NWP Yard is very limited, and so it is not possible to confirm that there have been no impacts to ground water. The installation of several groundwater monitoring wells has been recommended by ERM in the NWP Preliminary Site Contamination Study issued 9 May 1996.

ERM-Northeast has developed a form to record findings of the environmental compliance audit at the NWP facility. This Assessment Finding Form serves two purposes:

- It clearly communicates the nature, impact, and appropriate corrective actions of each finding identified, thereby satisfying the reporting requirements of the Memorandum of Understanding.
- It acts as a managerial tool to facilitate the timely completion of all necessary corrective actions recommended by ERM. The forms will provide Metro-North, the NYSDEC and ERM a means to verify that each compliance issue has been appropriately addressed.

Format

Once a compliance issue has been identified, it will be summarized on an Assessment Finding Form (Figure 3-1). The Assessment Finding Form is divided into six sections which describe different aspects of the issue and recommended solutions. These sections are identified as A through F on Figure 3-1 for illustration. Sections A and B are focused on the recognition and evaluation of the finding while Sections C, D, E and F detail the measures to control the issue.

Logistical Information

The first section of the Assessment Finding Form (shown as A in Figure 3-1) identifies the Metro-North yard, department, building/area, and specific location where the finding was identified. This section also

details the date on which the finding was observed, the auditor(s) name and the number of the finding for the report.

Finding Description

Part B of the Finding Form, Compliance Exposure, is used to summarize the nature of the finding. The Environmental Topic line may include categories such as Drum Storage, Underground Storage Tanks, or Air Emissions. The next line, Regulatory Reference, identifies the exact federal or state regulation supporting the identified issue.

Root Cause

Part C of the Finding Form, Root Cause, is used to identify systemic issues which have lead to the occurrence of the finding in question. The purpose of identifying the Root Cause is to provide information to aid in focusing the management of the solution on the cause of the issue rather than the symptom (the issue itself). Addressing Root Causes prevents the issue from returning in the future.

Corrective Actions

The next two sections on the Finding Form focus on the corrective action recommended to control the identified issue. The Recommended Corrective Action section (Figure 3-1, Part D) provides a recommendation to address the identified problem and initiate the control of the exposure as well as regulatory compliance. This section includes a space to be completed by the facility and which identifies which Metro-North employee has been assigned the responsibility of completing the corrective action, the targeted completion date for the task, and whether the project involves a capital request.

Immediately below the recommended corrective action is a section completed by the facility describing how Metro-North specifically intends to address the recommended corrective action (Figure 3-1, Part E). This section also provides space for internal and third party auditing of the completion of the corrective action project. The third party auditing will be conducted approximately one year following the completion of this compliance audit.

Managed Solution

The final section of the Finding Form, Managed Solution (Figure 3-1, Part F), details Metro-North's formula for eliminating the root cause of the problem. These are the systems necessary to develop the overall facility programs which integrate environmental compliance into the daily operation of the business. These will include the plans which promote the recognition, evaluation and control of environmental exposures within the facility by all employees as a routine part of the job and overall job performance. As with the planned action section, this section provides space for recording the results of internal auditing of the completion of the project.



3.1 *AIR EMISSIONS*

**METRO-NORTH COMMUTER RAILROAD
NORTH WHITE PLAINS RAILROAD YARD
SUMMARY OF AIR EMISSIONS FINDINGS
TABLE 3-1**

FINDING NUMBER	DESCRIPTION
AR-1NWP	Submit Certificate to Operate applications for the two oil-fired boilers in accordance with Part 201.
AR-2NWP	Develop emissions inventory
AR-3NWP	Confirm submission of Part 202-2 emission statements
AR-4NWP	Determine size and VOC content of architectural coatings
AR-5NWP	Confirm compliance with Part 226
AR-6NWP	Confirm compliance with Part 228
AR-7NWP	Confirm compliance with Part 230

ASSESSMENT FINDING FORM

Date: 6/17/96Bldg/ Area: Boiler House
West Side of the TracksFinding No.: AR-1NWPYard: North White Plains
Dept.: _____Specific Location: Two Cleaver Brooks,
Package BoilersAuditors: Peggy Morocco**COMPLIANCE EXPOSURE****Environmental Topic:** Air Compliance**Regulatory Reference:** 6 NYCRR Part 201

The facility operates two oil-fired, packaged boilers, each with a heat input of 14.645 million Btu per hour. Recent revisions to Part 201 changed the combustion exemption from 20 mmBtu/hr to 10 mmBtu/hr. Prior to the revisions, both boilers were exempted from permitting requirements. Each boiler is now expected to require an operating permit as an "air contamination source" based on the following definition from Part 200:

Any apparatus, contrivance or machine capable of causing emission of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

Part 201-1.2 states that an emission source is subject to all regulations that were applicable to it at the time of construction and any subsequent requirements applicable to existing sources. There is no record of a Permit to Construct or Certificate to Operate for either boiler.

ROOT CAUSE:**RECOMMENDED CORRECTIVE ACTION (Description):**

Submit a Certificate to Operate application for each boiler to NYSDEC.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:**Verification (MN)**

Action Completed: Y N

Verified By:

Date:

Comments:

ASSESSMENT FINDING FORM

Date: 6/17/96Bldg/ Area: Facility-WideFinding No.: AR-2NWPYard: North White Plains
Dept.:Specific Location: West/East Side of TracksAuditors: Peggy Morocco**COMPLIANCE EXPOSURE****Environmental Topic:** Air Compliance**Regulatory Reference:** 6 NYCRR Part 201

Effective July 1996, New York revised its air permitting regulation in a manner that establishes three categories of facility permits: Minor Facility Registrations, State Facility Permits, and Title V Facility Permits. Revised Part 201 (Permits and Registrations) is applicable to the North White Plains facility. A facility-wide inventory of actual and potential emissions of regulated air pollutants is required to correctly assess the facility's major source status and Part 201 applicability under the appropriate air permit category. This inventory may also be required to "cap" the facility out of program applicability.

ROOT CAUSE:**RECOMMENDED CORRECTIVE ACTION (Description):**

Develop a facility-wide actual and potential emissions inventory of regulated air pollutants to accurately determine the facility's major source status and assess Part 201 permit applicability. Comply with the appropriate Part 201 permit requirements by completing a Minor Facility Registration, State Facility Permit/Cap Plan, or Title V Facility Permit in accordance with the schedule prescribed in Part 201.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:**Verification (MN)**

Action Completed: Y N

Verified By:

Date:

Comments:

ASSESSMENT FINDING FORM

Date: 6/17/96Bldg/ Area: Facility-WideFinding No.: AR-3NWPYard: North White Plains
Dept.:Specific Location: West/East Side of TracksAuditors: Peggy Morocco**COMPLIANCE EXPOSURE****Environmental Topic:** Air Compliance**Regulatory Reference:** 6 NYCRR Part 202-2

According to Part 202-2, any owner or operator of a facility in an ozone non-attainment area must submit an emission statement to NYSDEC for any calendar year in which the facility has the potential to emit any regulated air pollutant at a rate with equals or exceeds the applicable threshold. Records of reports must be maintained for five years. In Westchester County, the applicability threshold for VOCs is 25 tons per year and for single/combined HAPs is 10/25 tons per year, respectively. Based on ERM's review-to-date of North White Plains' potential emissions, annual VOC and HAP emission estimates may exceed the applicability thresholds.

ROOT CAUSE:**RECOMMENDED CORRECTIVE ACTION (Description):**

Determine whether Part 202-2 emission statements must be submitted. Contact NYSDEC regarding the appropriate action.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:**Verification (MN)**

Action Completed: Y N

Verified By:

Date:

Comments:

ASSESSMENT FINDING FORM

Date: 6/17/96Bldg/ Area: Communications and Signals
East Side of TracksFinding No.: AR-4NWPYard: North White Plains
Dept.:Specific Location: Facility/Track Field
MaintenanceAuditors: Peggy Morocco**COMPLIANCE EXPOSURE****Environmental Topic:** Air Compliance**Regulatory Reference:** 6 NYCRR Part 205

Part 205 (Architectural Surface Coatings) pertains to the application of architectural coatings within the New York City metropolitan area (including Westchester County), and states that no person will apply any architectural coating manufactured after 1 July 1989 which contains more than 2.09 lbs VOC per gallon coating. An architectural coating is defined as *any coating applied to stationary structures and their appurtenances, to mobile homes, to pavements, or to curbs*. The regulation provides an exemption for architectural coatings which are supplied in containers with a capacity of less than one quart. North White Plains' Communications and Signals personnel paint outdoor structures with architectural surface coatings as part of normal equipment construction/installation/maintenance.

ROOT CAUSE:**RECOMMENDED CORRECTIVE ACTION (Description):**

Investigate C&S's architectural coating containers to determine if the size exemption (< 1 quart) applies. If the exemption does not apply, verify that the VOC content of the coatings does not exceed 2.09 lbs/gal.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:**Verification (MN)**

Action Completed: Y N

Verified By:

Date:

Comments:

ASSESSMENT FINDING FORM

Date: 6/17/96Bldg/ Area: C&S Shop
East Side of the TracksFinding No.: AR-5NWPYard: North White Plains
Dept.:Specific Location: Parts Degreaser, Shop FloorAuditors: Peggy Morocco**COMPLIANCE EXPOSURE****Environmental Topic:** Air Compliance**Regulatory Reference:** 6 NYCRR Part 226

The North White Plains Yard has a cold cleaning degreasing process based on the following definition from Part 226:

Batch process of solvent metal cleaning by spraying, brushing, flushing or immersion while maintaining the solvent below its boiling point.

Section 226.2 requires the following: 1) solvent metal cleaning equipment must be maintained to minimize leaks and fugitive emissions; 2) solvent metal cleaning equipment must display a summary of proper operating procedures consistent with minimizing VOC emissions; 3) solvent metal cleaning equipment covers must be closed when the unit is not in service; 4) a record of solvent consumption must be maintained for each year; and 5) clean parts must be drained at least 15 seconds or until dripping ceases.

ROOT CAUSE:**RECOMMENDED CORRECTIVE ACTION (Description):**

Review existing methods and procedures to ensure that the solvent metal cleaning equipment is operated in accordance with Part 226 requirements. Develop procedures to cover any areas not already adequately addressed.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:**Verification (MN)**

Action Completed: Y N

Verified By:

Date:

Comments:

ASSESSMENT FINDING FORM

Date: 6/17/96Bldg/ Area: M of E Paint Shop
West Side of the TracksFinding No.: AR-6NWPYard: North White Plains
Dept.: _____Specific Location: Railroad Car Painting BaysAuditors: Peggy Morocco**COMPLIANCE EXPOSURE****Environmental Topic:** Air Compliance**Regulatory Reference:** 6 NYCRR Part 228

Part 228 (Surface Coating Processes) regulates the allowable pounds of volatile organic compounds (VOC) per gallon of applied coating for specific processes and products. Coating lines for Miscellaneous Metal Parts and Products which apply extreme performance coatings designed for harsh exposure or extreme environmental conditions are limited to 3.5 lbs/gal VOC. Coating lines which perform Motor Vehicle Refinishing (including automobiles, trucks, or buses) are limited to 6.2 lbs/gal VOC for repair/touchups and 5.0 lbs/gal VOC for overall coating. Part 228 requires that the following records be maintained on site for 5 years: 1) certification from suppliers verifying the actual VOC content of applied coatings; and 2) purchase, usage and/or production records of the coatings. North White Plains' paint shop is comprised of two main bays for railroad cars and four exhaust points (WP001 - WP004). The NYSDEC has previously specified that the applicable process category in Part 228 for the North White Plains facility is Miscellaneous Metals Part and Products. Therefore, the VOC content of applied coatings has been restricted to 3.5 lbs/gal for Emission Points WP001-WP004. Recent discussions with NYSDEC's Central Office and the Region 3 Sub-office have indicated that Motor Vehicle Refinishing may be a more appropriate process category for North White Plains' surface coating operations.

ROOT CAUSE:**RECOMMENDED CORRECTIVE ACTION (Description):**

Continue discussions with NYSDEC's Region 3 sub office (Mr. Thomas McGillick) to confirm facility applicability under Part 228's Motor Vehicle Refinishing process category (instead of Miscellaneous Metal Parts and Products). Ensure that all applied coatings are in compliance with the 5.0/6.2 lbs/gal VOC limitations. Review existing recordkeeping procedures to ensure that the Part 228 requirements are met.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:**Verification (MN)**

Action Completed: Y N

Verified By:

Date:

Comments:

ASSESSMENT FINDING FORM

Date: 6/17/96Bldg/ Area: C&S Building
East Side of the TracksFinding No.: AR-7NWPYard: North White Plains
Dept.: _____Specific Location: Gasoline Dispensing SiteAuditors: Peggy Morocco**COMPLIANCE EXPOSURE****Environmental Topic:** Air Compliance**Regulatory Reference:** 6 NYCRR Part 230

Part 230 states that gasoline dispensing sites located in the New York City metropolitan area are required to have Stage I and Stage II vapor collection systems. The regulation requires owners/operators of Stage I/II vapor collection to: 1) provide training regarding specific operating procedures and post operating instructions on each dispenser; 2) perform daily inspections of Stage II components; 3) empty vapor return line condensate traps on Stage II systems.; 4) perform dynamic back pressure, liquid blockage, and leak tests at five year intervals and certify test results; 5) maintain records showing the quantity of all gasoline delivered to the site for at least two years; 6) register the site pursuant to Part 201; and 7) post a copy of the registration form at the gasoline dispensing site. The North White Plains facility received approval of their gasoline dispensing site registration in April 1990.

ROOT CAUSE**RECOMMENDED CORRECTIVE ACTION (Description):**

A copy of North White Plains' Automotive Fueling Stage I/II Permit was requested from the NYSDEC Region 3 office in correspondence dated 9 August 1996. ERM subsequently received a copy of this registration. Review existing procedures to ensure that the facility's fuel dispensing site is operated in compliance with all the requirements specified in Part 230 and permit specific requirements regarding Stage II replacement parts and defective components. Revise procedures if necessary.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:**Verification (MN)**

Action Completed: Y N

Verified By:

Date:

Comments:



3.2 *WASTEWATER*

[illegible]

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Facility Wide

Finding No.: WW-1NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE **Environmental Topic: Waste Water Regulatory Reference: 40 CFR 122**

The NWP yard does not have a finalized Stormwater Pollution Prevention Plan (SWPPP)..

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

The SWPPP should be updated, completed and implemented.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

3.3

SOLID WASTE MANAGEMENT

**METRO-NORTH COMMUTER RAILROAD
NORTH WHITE PLAINS RAILROAD YARD
SUMMARY OF SOLID WASTE MANAGEMENT FINDINGS
TABLE 3-3**

FINDING NUMBER	DESCRIPTION
SW-1NWP	Tank 15C is not registered.
SW-2NWP	A 30 gallon drum of used oil was not labeled

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: M of W

Finding No.: SW-1NWP

Yard: North White Plains

Specific Location: 2,000 gallon used oil AST

Auditors: Rick Schulman

Dept.:

<u>COMPLIANCE EXPOSURE</u>		Environmental Topic: Solid Waste	Regulatory Reference: 6 NYCRR 360-14
Tank No. 15-C is not registered..			
<u>ROOT CAUSE:</u>			
<u>RECOMMENDED CORRECTIVE ACTION (Description):</u> Register Tank No. 15-B.		Assigned To: Target Completion: Capital Project Request: Y N	
<u>PLANNED ACTION (MN)</u>	Comments:		
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:		
Third Party Verification: Action Completed: Y N Verified By: Date:			
<u>MANAGED SOLUTION:</u>			
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:		

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Small Engine Room

Finding No.: SW-2NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: Solid Waste

Regulatory Reference: 6 NYCRR360-14.3(h)

A 30 gallon drum, reportedly containing used oil, was not labeled.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

Identify and label all containers being utilized to store used oil.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

3.4 *HAZARDOUS WASTE MANAGEMENT*

**METRO-NORTH COMMUTER RAILROAD
NORTH WHITE PLAINS RAILROAD YARD
SUMMARY OF HAZARDOUS WASTE MANAGEMENT FINDINGS
TABLE 3-4**

FINDING NUMBER	DESCRIPTION
HW-1NWP	Facility does not have RCRA training records
HW-2NWP	Facility need waste minimization plan
HW-3NWP	Satellite accumulation limits exceeded
HW-4NWP	Satellite accumulation limits exceeded
HW-5NWP	Safety-Kleen solution being shipped w/o manifest
HW-6NWP	Sand blast debris unlabeled

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Facility Wide

Finding No.: HW-1NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: Hazardous Waste Regulatory Reference: 373-3.2(g)

Metro-North utilizes a consultant to provide RCRA training. However, records which would demonstrate that the NWP yard employees involved with the management of hazardous waste have received RCRA training were not available.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

Training records should be retained at the NWP yard for at least three years.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Facility Wide

Finding No.: HW-2NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: Hazardous Waste

Regulatory Reference: Hazardous Waste Manifest

The existence of a waste minimization plan could not be confirmed.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

The West side of the NWP Yard is believed to be a large quantity generator and should develop a waste minimization plan.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: M of W

Finding No.: HW-3NWP

Yard: North White Plains
Dept.:

Specific Location: Equipment Shop west wall

Auditors: Rick Schulman

COMPLIANCE EXPOSURE		Environmental Topic: Hazardous Waste	Regulatory Reference: 6 NYCRR Part 372.2(a)(8)
Multiple drums of partially full aerosol cans are being accumulated in one location, adjacent to full containers of diesel fuel and gasoline.			
ROOT CAUSE:			
RECOMMENDED CORRECTIVE ACTION (Description): Once drum is full, it should be dated and relocated to the 90 day accumulation area..		Assigned To: Target Completion: Capital Project Request: Y N	
PLANNED ACTION (MN)	Comments:		
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:		
Third Party Verification: Action Completed: Y N Verified By: Date:			
MANAGED SOLUTION:			
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:		

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Paint Shop

Finding No.: HW-4NWP

Yard: North White Plains
Dept.: _____

Specific Location: West Side

Auditors: Rick Schulman

COMPLIANCE EXPOSURE

Environmental Topic: Hazardous Waste **Regulatory Reference:** 6NYCRR Part 372.2(a)(8)

Three drums of waste paint were being accumulated in one location.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

Once a drum is full, it should be dated and relocated to the 90 day accumulation area. This should result in only one drum at a time at an accumulation site.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: M of E

Finding No.: HW-5NWP

Yard: North White Plains
Dept.: _____

Specific Location: _____

Auditors: Rick Schulman

COMPLIANCE EXPOSURE

Environmental Topic: Hazardous Waste **Regulatory Reference:** 6 NYCRR Part 372.2(b)

Safety-Kleen Parts washer solution is being sent off-site without a manifest. Paperwork associated with the shipments indicates that the NWP yard is a conditionally exempt small quantity generator. NWP is either a small quantity (East side) or large quantity generator (West side)..

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

Safety-Kleen should be informed that the NWP yard is a generator of hazardous waste. The parts solution should be characterized and if hazardous, alternatives should be explored.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: C and S outdoor storage

Finding No.: HW-6NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: Hazardous Waste **Regulatory Reference:** 6 NYCRR Part 372.2

One drum of sand blast debris was not in satellite accumulation and was not labeled. Lead concentration from paint debris must be analyzed

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

Recommend that drum contents be analyzed for lead (from paint debris) using TCLP. If TCLP for lead is above _____, drum must be labeled as hazardous waste and relocated to the 90 day waste accumulation area.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

3.5

PESTICIDES, HERBICIDES AND FUNGICIDES

**METRO-NORTH UTILIZES LICENSED INDEPENDENT CONTRACTOR(S)
FOR THE APPLICATION OF ALL PESTICIDES, FUNGICIDES,
RODENTICIDES AND HERBICIDES AT THE HARMON YARD.**

NO ENVIRONMENTAL COMPLIANCE FINDINGS WERE IDENTIFIED

3.6

SPECIAL POLLUTANTS

METRO-NORTH HAS INDICATED THAT ALL MAJOR ELECTRICAL EQUIPMENT CONTAINING PCBs WERE REMOVED FROM SERVICE AT THE NORTH WHITE PLAINS YARD IN ACCORDANCE WITH 40 CFR PART 761.

METRO-NORTH HAS INDICATED THAT IT HAS RETAINED AND MAINTAINED ITS NORTH WHITE PLAINS RECORDS, HOWEVER NONE WERE AVAILABLE FOR ERM's REVIEW.

3.7 *DRINKING WATER*

**THERE WERE NO ENVIRONMENTAL COMPLIANCE FINDINGS
ASSOCIATED WITH DRINKING WATER REQUIREMENTS**

3.8

PETROLEUM SPILL PREVENTION

**METRO-NORTH COMMUTER RAILROAD
NORTH WHITE PLAINS RAILROAD YARD
SUMMARY OF PETROLEUM SPILL PREVENTION FINDINGS
TABLE 3-8**

FINDING NUMBER	DESCRIPTION
SP-1NWP	The facility does not have a finalized SPCC Plan.
SP-2NWP	The facility does not have spill training records
SP-3NWP	The facility does not have inspection records on file
SP-4NWP	The facility does not have calculations for secondary containment capacity

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Facility Wide

Finding No.: SP-1NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: Spill Prevention

Regulatory Reference: 40 CFR 112

The NWP Yard does not have an up-to-date, finalized Spill Prevention, Control and Countermeasure (SPCC) Plan.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

The SPCC plan should be finalized and implemented.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Facility Wide

Finding No.: SP-2NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: Spill Prevention

Regulatory Reference: 40 CFR 112.7(e)(10)

The NWP Yard has no record of providing Spill Prevention Training.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

The facility should implement a spill prevention training program.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Facility Wide

Finding No.: SP-3NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: Spill Prevention Regulatory Reference: 40 CFR 112

The NWP yard has no inspection records on file.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

Develop files for inspections. Retention period is a minimum of three years.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: M of W/Equipment Shop

Finding No.: SP-4NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: **Spill Prevention** Regulatory Reference: 6 NYCRR613.3(c)(6)

Calculations which would demonstrate that the secondary containment provided for the three, 2,000 gallon ASTs located in the M of W shop is 110% of the capacity of the largest tank were not available.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

Secondary containment capacity should be confirmed.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

3.9

HAZARDOUS MATERIALS MANAGEMENT

**METRO-NORTH COMMUTER RAILROAD
NORTH WHITE PLAINS RAILROAD YARD
SUMMARY OF HAZARDOUS MATERIALS MANAGEMENT FINDINGS
TABLE 3-9**

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: Facility Wide

Finding No.: HM-1NWP

Yard: North White Plains

Specific Location: _____

Auditors: Rick Schulman

Dept.: _____

COMPLIANCE EXPOSURE

Environmental Topic: Hazardous Materials Regulatory Reference: 40 CFR 370

Tier II reports for the years 1990 through 1995 were not available for review. Compliance could not be confirmed.

ROOT CAUSE:

RECOMMENDED CORRECTIVE ACTION (Description):

Tier II's should be submitted to the LEPC and SERC annually by March 1 and records maintained on site.

Assigned To:

Target Completion:

Capital Project Request: Y N

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

MANAGED SOLUTION:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

**3.10 *PETROLEUM BULK STORAGE TANK
MANAGEMENT***

**METRO-NORTH COMMUTER RAILROAD
NORTH WHITE PLAINS RAILROAD YARD
SUMMARY OF PETROLEUM BULK STORAGE TANK MANAGEMENT FINDINGS
TABLE 3-10**

FINDING NUMBER	DESCRIPTION
PS-1NWP	Fill port for tank 15-B is not color coded or labeled.
PS-2NWP	Tank 14F is not labeled with capacities

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: M of E

Finding No.: PS-1NWP

Yard: North White Plains
Dept.: _____

Specific Location: 20,000 gallon heating oil UST

Auditors: Rick Schulman

COMPLIANCE EXPOSURE		Environmental Topic:	Regulatory Reference:
The fill port for Tank No. 15-B is not color coded.			
ROOT CAUSE:			
RECOMMENDED CORRECTIVE ACTION (Description): Color code fill port.		Assigned To: Target Completion: Capital Project Request: Y N	
PLANNED ACTION (MN)	Comments:		
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:		
Third Party Verification: Action Completed: Y N Verified By: Date:			
MANAGED SOLUTION:			
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:		

METRO-NORTH RAILROAD

ASSESSMENT FINDING FORM

Date: 6/17/96

Bldg/ Area: M of W/Wash Shed

Finding No.: PS-2NWP

Yard: North White Plains
Dept.:

Specific Location: Tank 14F 3,000 gallon diesel AST

Auditors: Rick Schulman

<u>COMPLIANCE EXPOSURE</u>		Environmental Topic: Hazardous Waste	Regulatory Reference: Hazardous Waste
Manifest Tank 14F was not labeled with the design or working capacity.			
<u>ROOT CAUSE:</u>			
<u>RECOMMENDED CORRECTIVE ACTION (Description):</u> Label Tank 14F.		Assigned To: Target Completion: Capital Project Request: Y N	
<u>PLANNED ACTION (MN)</u>	Comments:		
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:		
Third Party Verification: Action Completed: Y N Verified By: Date:			
<u>MANAGED SOLUTION:</u>			
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:		

Environmental issues identified during the audit which are not directly associated with regulatory compliance, but in the opinion of the auditor, represent a significant exposure to Metro-North, will be reported on a Best Management Practice (BMP) Finding Form (Figure 4-1). This form is identical in format to the Assessment Finding Form except that it does not include sections identifying root causes or managed solutions.

ISSUES TO BE ADDRESSED IN THE BMP PLAN

The preparation of a BMP Plan is a separate task under the MOU. However, an objective of the ECR task is to identify issues that will be addressed in the BMP Plan, and to recommend appropriate BMP measures.

Therefore, as part of the ECR ERM has identified facility locations that handle, store, or use toxic or hazardous pollutants, and has assessed the potential for release of pollutants, and provided BMPs to prevent or minimize the potential for release. ERM has 1) identified toxic and hazardous pollutants used on-site; 2) identified facility locations where the pollutants are used, stored, or handled; and 3) evaluated the potential release of significant amounts of the pollutants. In areas where the potential for release is significant, ERM has recommended BMPs. BMPs will include either administrative activities, such as establishment of procedures, training, preventive maintenance measures, and/or structural measures, such as construction of secondary containment devices.

BMP FINDING FORM

Date: _____

Bldg/Area: _____

Finding No.: _____

Yard: North White Plains

Specific Location: _____

Auditors: _____

Dept.: _____

ISSUE: **Environmental Topic:****BMP RECOMMENDED:****PLANNED ACTION (MN)**

Assigned To: _____

Target Completion: _____

Capital Project Request: Y _____ N _____

Verification (MN)

Action Completed: Y _____ N _____

Verified By: _____

Date: _____

Comments:

Third Party Verification:

Action Completed: Y _____ N _____

Verified By: _____

Date: _____

**METRO-NORTH COMMUTER RAILROAD
NORTH WHITE PLAINS RAILROAD YARD
SUMMARY OF BMP FINDINGS
TABLE 4-0**

FINDING NUMBER	SUBJECT
BMP-1NWP	Secondary containment at fill port.
BMP-2NWP	Solid waste disposal at dumpster.
BMP-3NWP	Unlabeled drum.
BMP-4NWP	Procedure for cleaning paint shop drains.
BMP-5NWP	Add secondary containment for drum.
BMP-6NWP	Finalize Tank Management Plan.
BMP-7NWP	Characterize fluorescent light bulbs.
BMP-8NWP	Develop Waste Management Plan.
BMP-9NWP	Confirm PCB content of transformers.
BMP-10NWP	Develop procedure for battery disposal.
BMP-11NWP	Install secondary containment for transformers.
BMP-12NWP	Develop procedure for battery disposal.
BMP-13NWP	Relocate drums/characterize sump debris.

BMP FINDING FORMDate: 17 June 1996Bldg/ Area: Boiler RoomFinding No.: BMP-1NWPYard: North White PlainsSpecific Location: West Side Yard OperationsAuditors: John Iannone, Rick Schulman

Dept.:

ISSUE: Environmental Topic: Petroleum Spill Pervention A 20,000 gallon tank used to store No. 2 fuel oil for the west side boiler room is filled remotely through an exterior fill port located in a vault that is outside of and adjacent to the door to the boiler room. An open storm water sewer drain is located approximately 20 feet from the fill port.	
BMP RECOMMENDED: Provide secondary spill containment for the fill port area. Develop procedures to control spills, including a procedure to temporarily seal or cover the storm water sewer drain during filling operations. Train Metro-North personnel in procedures to be followed in the event of a spill or reference appropriate Metro-North plan (e.g., Tank Management Plan or Spill Prevention, Control and Countermeasure Plan)..	
PLANNED ACTION (MN)	
Assigned To: Target Completion: Capital Project Request: Y N	
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:
Third Party Verification: Action Completed: Y N Verified By: Date:	

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 6/17/96

Bldg/ Area: Dumpster Area

Finding No.: BMP-2NWP

Yard: North White Plains

Specific Location: West Side Yard Operations

Dept.:

<p>ISSUE: Environmental Topic: Solid Waste Management</p> <p>An accumulation of trash and solid waste was observed around the dumpsters used to store solid waste. Dumpsters are located on the west edge of pavement in the northern section of the Yard, adjacent to the Bronx River. Pavement beneath and around dumpsters was stained. Dumpsters should contain solid waste (trash) only.</p> <p>BMP RECOMMENDED:</p> <p>Develop housekeeping procedures to keep areas around solid waste dumpsters free of trash. Provide leak-proof containers for all non-hazardous solid waste that may contain liquids.</p>	<p>Assigned To:</p> <p>Target Completion:</p> <p>Capital Project Request: Y N</p>
--	--

PLANNED ACTION (MN)

Comments:

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 6/17/96

Bldg/ Area: Maintenance of Way Work Equipment Shop

Finding No.: BMP-3NWP

Yard: North White Plains

Specific Location: West Side Yard Operations

Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: Environmental Topic: Solid Waste Management An unlabeled 30-gallon drum was stored in this area.	
BMP RECOMMENDED: Determine material contents and possible waste classification (i.e., if the material is a waste), Transport and properly dispose of drum in approved off-site facility..	Assigned To: Target Completion: Capital Project Request: Y N
PLANNED ACTION (MN)	Comments:
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:
Third Party Verification: Action Completed: Y N Verified By: Date:	

BMP FINDING FORMDate: 17 June 1996Bldg/ Area: Paint ShopFinding No.: BMP-4NWPYard: North White PlainsSpecific Location: Drains in Paint Shop (West Side)Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: Environmental Topic: Hazardous Waste Management During paint stripping and painting operations, waste accumulates in drains in the building. Drains are plugged during paint stripping and painting operations and waste is allowed to accumulate in drains. When operations are completed or drains are full, waste is vacuumed into drums for disposal.	
BMP RECOMMENDED: A written procedure is needed to document and control this practice. Metro-North personnel should be trained in the implementation of this process, once it has been documented.	
PLANNED ACTION (MN)	
Assigned To: Target Completion: Capital Project Request: Y N	
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:
Third Party Verification: Action Completed: Y N Verified By: Date:	

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: Small Engine Repair Shop

Finding No.: BMP-5NWP

Yard: North White Plains

Specific Location: Dynamometer Room (West Side)

Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: Environmental Topic: Petroleum Spill Prevention A 55-gallon drum of diesel fuel is stored in the Dynamometer Room. The diesel fuel is used to test repaired engines. There is no containment around drum and there are trench and floor drains in this room.	
BMP RECOMMENDED: Provide secondary containment for this 55-gallon drum.	
PLANNED ACTION (MN)	Assigned To: Target Completion: Capital Project Request: Y N
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:
Third Party Verification: Action Completed: Y N Verified By: Date:	

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: Facility Wide

Finding No.: BMP-6NWP

Yard: North White Plains

Specific Location: All Areas

Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: Environmental Topic: Petroleum Spill Prevention Although a tank management plan exists, it is in form and has not been distributed or finalized.	
BMP RECOMMENDED: Update, finalize and distribute the tank management plan. The plan should include a method for changing the plan when tanks are added or deleted. Include instruction on purpose and use the plan for affected Metro-North personnel.	
PLANNED ACTION (MN)	Assigned To: Target Completion: Capital Project Request: Y N
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:
Third Party Verification: Action Completed: Y N Verified By: Date:	

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: Maintenance of Way Work Equipment Shop

Finding No.: BMP-7NWP

Yard: North White Plains

Specific Location: All Areas

Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: **Environmental Topic: Solid Waste Management**

Fluorescent light bulbs are generated in various shops and NWP yard buildings. The disposal method of these light bulbs could not be verified.

BMP RECOMMENDED:

Evaluate disposal method. If disposal as solid waste, a waste determination should be performed to establish hazardous waste status. Document findings. Collection and special disposal may be necessary.

PLANNED ACTION (MN)

Assigned To:

Target Completion:

Capital Project Request: Y N

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: Facility Wide

Finding No.: BMP-8NWP

Yard: North White Plains

Specific Location: All Areas

Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: Environmental Topic: Solid Waste Management Solid and hazardous wastes are disposed of without monetary accountability from those shops generating the waste.	
BMP RECOMMENDED: Evaluate and institute an accounting system so shops are accountable for wastes generated. Pursue this as a means of waste minimization.	
PLANNED ACTION (MN)	
Assigned To: Target Completion: Capital Project Request: Y N	
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:
Third Party Verification: Action Completed: Y N Verified By: Date:	

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: Facility Wide

Finding No.: BMP-9NWP

Yard: North White Plains

Specific Location: All Areas

Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: Environmental Topic: Solid Waste Management The NWP Yard does not have a waste management plan.	
BMP RECOMMENDED: Develop and implement a waste management plan. Integration of this plan with other Metro-North railroad yards should be considered.	
PLANNED ACTION (MN)	
Assigned To: Target Completion: Capital Project Request: Y N	
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:
Third Party Verification: Action Completed: Y N Verified By: Date:	

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: Overhead Line Department

Finding No.: BMP-10NWP

Yard: North White Plains

Specific Location: Line Gang Trailers (East Side)

Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: **Environmental Topic: Solid Waste Management**

The following small distribution transformer units were observed: (1) three older units in service on west side; (2) three mounted units not in service on east side; and two units are in storage on east side. Information on PCBs was not available at Yard but may be available from Metro-North Power Department in New York City from transformer survey performed several years ago.

BMP RECOMMENDED:

These are small distribution units and there is no regulatory (TSCA) requirement to test these units when they are in storage or in use. Testing is only required when units are to be disposed. Recommend testing and labeling of these transformer units to confirm absence of PCBs.

PLANNED ACTION (MN)

Assigned To:

Target Completion:

Capital Project Request: Y N

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: Substation B-24

Finding No.: BMP-11NWP

Yard: North White Plains

Specific Location: LocationOutdoor Transformer Area (East Side) Auditors: John Iannone, Rick Schulman

Dept.:

ISSUE: Environmental Topic: Solid Waste Management Two large transformers are located in an outdoor area. The total volume of oil (non-PCBs) stored in these units is 5,000 gallons.	
BMP RECOMMENDED: Secondary containment is not required but is recommended as a BMP.	
PLANNED ACTION (MN)	Assigned To: Target Completion: Capital Project Request: Y N
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:
Third Party Verification: Action Completed: Y N Verified By: Date:	

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: Substation B-24

Finding No.: BMP-12NWP

Yard: North White Plains

Specific Location: Inside Substation

Auditors: Iannone, Rick Schulman

Dept.:

ISSUE: There are no formal procedures in place for the management of used batteries from this substation. <u>BMP CORRECTIVE ACTION:</u> Develop a uniform waste disposal policy for used batteries.		Environmental Topic: Waste Disposal Assigned To: Target Completion: Capital Project Request: Y N
<u>PLANNED ACTION (MN)</u>	Comments:	
Verification (MN) Action Completed: Y N Verified By: Date:	Comments:	
Third Party Verification: Action Completed: Y N Verified By: Date:		

METRO-NORTH RAILROAD

BMP FINDING FORM

Date: 17 June 1996

Bldg/ Area: West Side: Maintenance of Equipment Shop
East Side: C&S Storage Area

Finding No.: BMP-13NWP

Yard: North White Plains
 Dept.:

Specific Location: Outdoor Storage

Auditors: John Iannone, Rick Schulman

ISSUE: Environmental Topic: Waste Disposal

Empty drums were observed stored on bare pavement along the west wall of the Maintenance of Equipment Shop on west side of the Yard. Oil stains on the pavement in this area were observed.

Empty drums were also stored on bare pavement in the Communication and Signals (C&S) outdoor storage area. Waste drums containing storm water and oil from cleanout of automotive fueling facility area sump were stored three drums high. Waste oil drum was stored in this area without secondary containment.

BMP RECOMMENDED:

Relocate storage of empty drums to enclosed area. Provide absorbent pads beneath empty drums while in storage, awaiting transportation to Harmon Yard.

Characterize automotive fueling pad sump waste oil/water drums and dispose of properly.

Provide secondary containment for the waste drum being stored in this area.

PLANNED ACTION (MN)

Assigned To:

Target Completion:

Capital Project Request: Y N

Verification (MN)

Action Completed: Y N

Verified By:

Date:

Comments:

Third Party Verification:

Action Completed: Y N

Verified By:

Date:

**5.0 IDENTIFICATION OF PAST AND PRESENT ISSUES THAT
CONTRIBUTE TO ENVIRONMENTAL CONTAMINATION OR THE
RISK OF ENVIRONMENTAL CONTAMINATION**

A detailed discussion of past and present operations, practices and policies that either contribute to actual environmental impacts or pose a risk of environmental impacts were presented in Section 2.0 - Historical Operations and Section 3.0 - Current Operations of the Preliminary Site Contamination Study for the North White Plains Railroad Yard.

5.1 IDENTIFICATION OF ISSUES

As a function of the ECR effort, the identification of present operations, practices and policies that do or may cause impacts to the environment also took place. There were no additional issues or corrective action recommendations beyond those presented in Section 3.0 of this report.

5.2 RECOMMENDATIONS FOR CORRECTIVE ACTION

Recommendations for corrective action to address past and present issues will be presented as part of the North White Plains Railroad Yard Site Investigation/Remediation Study Report scheduled to be issued under separate cover on 16 January 1997.

6.0 FACILITY CIRCUMSTANCES THAT MAY RESULT IN ENVIRONMENTAL CONTAMINATION OR REGULATORY VIOLATIONS

The identification of circumstances identified as a function of the ECR that may result in contamination or the violation of regulations unless corrective action is taken is presented below.

6.1 IDENTIFICATION OF CIRCUMSTANCES

Circumstances which were identified during the conduct of the ECR of the NWP Rail Yard which may result in contamination or violations were as follows:

1. The management of hazardous wastes in accordance with 6NYCRR Part 370 may result in violations.

6.2 RECOMMENDATIONS FOR CORRECTIVE ACTION

The corrective action required to address each of the circumstances identified in Section 6.1 are as follows:

1. Personnel need to be trained on the management of hazardous wastes.