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Best Mgmt Practice Plan.pdf

DRAFT BEST MANAGEMENT PRACTICES PLAN

Metro-North Railroad
North White Plains Yard
North White Plains, New York 10520

September 2001

Prepared For:

NYSDEC
Albany, New York

Prepared By:

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LIST OF ACRONYMS

ADA	Americans with Disabilities Act
BMP	Best Management Practices
CAP	Corrective Action Plan
CFR	Code of Federal Regulations
CRTC	Chief Rail Traffic Controller
DECS	Department of Environmental Compliance and Services
DSCS	Department of Safety & Claims Services
NYSDEC	New York State Department of Environmental Conservation
EME	Environmental Management Evaluation
ECR	Environmental Compliance Review
EPCRA	Emergency Planning and Community Right to Know Act
MofE	Maintenance of Equipment
MNR	Metro North Railroad
MOU	Memorandum of Understanding
MofW	Maintenance of Way
MSDS	Material Safety Data Sheets
MTA	Metropolitan Transportation Authority
NJ	New Jersey
NYCRR	New York Code of Rules and Regulations
RP	Responsible Party
SPCC	Spill Prevention Control and Countermeasure Plan
SPDES	State Permitted Discharge Elimination System
SRC	Spill Response Contractor
SWPPP	Stormwater Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

Section 1

1.0 INTRODUCTION

1.1 PURPOSE AND REPORT ORGANIZATION

This document encompasses Metro North Railroad's (MNR) Best Management Practices (BMP) Plan for the North White Plains Yard facility located in North White Plains, Westchester County, New York. MNR is a public benefit corporation, which is required to follow most federal and state environmental regulations. The BMP Plan provides a detailed description of the programs, policies, procedures, and facilities designed to prevent, or minimize the potential for, release of toxic or hazardous pollutants. Releases caused by plant site runoff, spillage and leaks, sludge or waste disposal, or drainage from raw material storage are addressed in the BMP Plan.

This BMP Plan has been prepared in accordance with Article III of the Memorandum of Understanding (MOU) between the New York State Department of Environmental Conservation (DEC) and MNR, dated July 1994. The BMP Plan builds upon a number of MNR plans and programs developed in conjunction with regulatory or corporate requirements. Wherever possible these plans and programs have been established at the corporate level to leverage technical resources and minimize administrative overlap. As required by the MOU, each yard has been reviewed for BMP issues and yard-specific documentation developed to describe the results of yard evaluation. This BMP Plan outlines management system elements both at corporate and yard levels.

The BMP Plan covers the federal requirements contained in Section 402(a)(1) of the Clean Water Act and 40 CFR 125 Subpart K as well as New York requirements contained in 6 NYCRR Part 750 - New York Regulations on State Pollutant Discharge Elimination System. The BMP Plan builds upon NWP Yard's Stormwater Pollution Prevention Plan (SWPPP), located in Appendix C. Potential sources of pollution that could affect the quality of discharges were identified and baseline BMPs were described that could be used to reduce the amount of contamination. Potential sources of pollution that could affect the quality of stormwater discharges were identified in the SWPPP and baseline BMPs were described that could be used to reduce the amount of contamination. This BMP Plan outlines the management system that identifies practices which, when implemented, will reduce/minimize the potential for contaminated site run-off.

This plan is divided into thirteen sections as follows:

- Section 1.0, Introduction, describes the purpose and major features of the document and provides the facility policy statement.
- Section 2.0, General Information, provides a brief facility profile, administrative information, required information on BMP Plan approval and revision, and an organizational overview.
- Section 3.0, Federal and State Regulations, provides a summary and discussion of regulations applicable to release prevention and control at North White Plains Yard.
- Section 4.0, BMP Implementation, provides a detailed description of programs, policies, and procedures designed to prevent unintentional releases of toxic or hazardous pollutants and outlines the BMP Committee.
- Section 5.0, Risk Identification and Assessment, provides a detailed description of the water usage, material storage, material transfer, and BMP recommendations applicable to the major industrial stormwater and point discharge locations.
- Section 6.0, Training, provides a detailed description of all training provided and required to implement this plan.
- Section 7.0, BMP Incident Reporting, details the protocol used when an incident occurs at the facility.
- Section 8.0, Material Compatibility, details the compatibility of certain materials and chemicals that could be used at a facility.
- Section 9.0, Good Housekeeping, includes details on required preventive maintenance practices.
- Section 10.0, Inspection and Recordkeeping, covers the policy and procedures for inspections and recordkeeping.
- Section 11.0, Site Security, details features of the on-site security system.
- Section 12.0, Incident Investigation Program, summarizes the program used to investigate and report all incidents at the facility.
- Section 13.0, Management of Change, details the procedures used to track all changes to hazardous processes.

1.2 POLICY STATEMENT

MNR's President, Mr. Peter A. Cannito, issued the current version of the corporate Environmental Policy Statement on December 1, 2000. The policy statement is included here:

Metro-North is fully committed to the protection of environmental resources, worker health and compliance with State and Federal environmental and conservation laws and regulations. Our goal is to be responsible to our customers, neighbors, and employees by ensuring that our practices are protective of the environment.

We are committed to providing a work environment where all employees are free of exposure to conditions that present health and safety risks to them or their families.

Therefore Metro-North has adopted the following environmental principles:

- *Compliance with environmental and conservation laws and regulations is the responsibility of every Metro-North employee*
- *All Metro-North employees must be equipped and trained in a manner which facilitates compliance with environmental requirements*
- *All environmental violations, the cost of addressing such violations and fines for environmental non-compliance are avoidable*

Every employee has the responsibility to report activities that compromise Metro-North's ability to comply with environmental conservation laws.

In consideration of North White Plains Yard's policy to protect the health and safety of employees and the public, and to minimize the impact of North White Plains Yard operations on the environment, the management of North White Plains Yard has indicated their endorsement of this Best Management Practices Plan. The North White Plains BMP Plan Coordinators, Joanne Reilly, Nelson Rodrigues, and Lova Borisjuk have been assigned the leading role in achieving the objectives set forth by this document. The Plan Coordinators will also make recommendations to MNR management for the implementation of this Plan. The President has authority to set Policy regarding BMP preventive measures and resolve conflicts among Departments/Divisions regarding implementation of the BMP Plan. This plan is intended for implementation as a philosophy as much as a working mechanism.

In view of specific provisions of the policy promulgated by Metro North Railroad mandating North White Plains Yard's compliance with all applicable government regulatory agencies and legal requirements with respect to environmental concerns, this Best Management Practices Plan, dated August 2001, has my full and unmitigated support.

Joanne Reilly — 9/13/01
Joanne Reilly — Date
Manager, Environmental Compliance & Services
BMP Plan Coordinator

Nelson Rodrigues — 09/13/01
Nelson Rodrigues — Date
MofE Facility Supervisor
BMP Plan Coordinator

Lova Borisjuk — 9/10/01
Lova Borisjuk — Date
MOW Facility Supervisor
BMP Plan Coordinator

Karen Timko — 9/13/01
Karen Timko — Date
Director of Environmental Compliance & Services

Section 2

2.0 GENERAL INFORMATION

The North White Plains Railroad Yard (NWP Yard) is located in North White Plains, Westchester County, New York. The NWP Yard is owned by MNR. The yard is located on the Harlem Line, which provides rail services between Grand Central Terminal and Dover Plains. The yard lies between the Bronx River Parkway on the west and North Broadway (NY Route 22) on the east. The south end of the yard is bounded by Fisher Lane, and the north end of the yard is bounded by Virginia Road. The NWP Yard is bisected east and west by the main line tracks. The railroad yard is approximately 25 acres in size and has been in existence since the early 1900's. The railroad yard was operated by predecessor railroad companies until 1983 when Metro-North took over operations of the Harlem Line.

Between 1986 and 1994, Metro-North undertook several large-scale capital projects to upgrade the structure on both the west and east sides of the yard.

Major facilities on the west side of the North White Plains Yard include:

- A Maintenance of Way (MofW) building was constructed by Metro-North between 1988 and 1991. Operations in this building involve the maintenance and repair of heavy equipment used to maintain Metro-North's track. A paint shop is located adjacent to the east side of the building. The building is equipped with a series of floor drains that discharge to a 10,000-gallon holding tank.

- A Maintenance of Equipment (MofE) Building Shop was constructed just to the northeast of the MofW Building, between 1986 and 1988. Operations in the MofE Shop include car repairs, maintenance and cleaning. The shop contains material storage areas, a welding area, offices, a locker room and wreck crew equipment. Floor drains in the building also discharge to the 10,000-gallon underground tank.

- A wash shed is provided south of the MofW building to clean and prepare equipment prior to its entry into the MofW building.

- There are three prefabricated sheds provided for accumulation of industrial hazardous and non-hazardous wastes. These include flammable liquids and solvents, paints/thinners from the paint shop and batteries for recycling.

- A power substation, located on the southwest side of the yard, provides third rail power. The substation does not contain PCB transformers.

- A signal-generating substation, located on the southwestern end of the yard, supplies power to the signal system between Mott Haven and Brewster. The station does not contain PCB transformers.

Major facilities on the east side of the North White Plains Yard include:

- The Trainmen and Engineer's Building, designated as the Yard Office.
- Crew quarters for the car cleaners.
- Communications and Signal (C&S) Building used to house the C&S shop, C&S training center and, satellite office for the DECS (this includes Ken McHale's office). Floor drains in this building discharge to an 8,000-gallon underground tank. The building's boiler is supplied with fuel oil from a 10,000-gallon underground storage tank.
- Automotive Fueling Facility served from two underground storage tanks (3,000 gallons for diesel fuel and 5,000 gallons for unleaded gasoline).
- Two prefabricated units for the storage of hazardous materials and accumulation of hazardous and non-hazardous industrial wastes.
- Track department storage for sand, gravel and ties.

2.1 ADMINISTRATIVE INFORMATION

North White Plains Yard Operator:	Metro North Commuter Railroad Company 347 Madison Avenue – 12th Floor New York, New York 10017 Attention: Karen Timko, Director of Environmental Compliance and Services (212) 340-3322
BMP Plan Coordinator:	Joanne Reilly, Manager, Environmental Compliance & Services
Telephone:	(212) 340-3342
BMP Plan Coordinator:	Nelson Rodrigues, MofE Facility Supervisor
Telephone:	(914) 686-8706

BMP Plan Coordinator:	Lova Borisjuk, Senior Engineer-Work Equipment
Telephone:	(914) 686-8467

2.2 *AUTHORIZED PERSONNEL*

The BMP Plan will be maintained by the Plan Coordinators, Joanne Reilly, Nelson Rodrigues, and Lova Borisjuk. The Plan Coordinators will also make recommendations to MNR management for the implementation of the Plan. The President has authority to set Policy regarding BMP preventive measures and to resolve conflicts among Departments/Divisions regarding implementation of the BMP Plan.

The names of the individuals currently holding essential management positions in MNR are provided in Appendix A.

2.3 PLAN AVAILABILITY AND DISTRIBUTION

Copies of the BMP Plan will be made available to Departments whose activities/responsibilities within North White Plains Yard involve activities that could result in the release of toxic or hazardous pollutants.

The file copy of the BMP Plan will be maintained by the Department of Environmental Compliance and Services (DECS) and will be available for inspection by designated representatives of the United States Environmental Protection Agency (USEPA), the New York Department of Environmental Conservation (NYSDEC), and other authorized government agencies. A copy of the BMP Plan will also be located at the DECS North White Plains Yard, in Nelson Rodrigues' office, and in Lova Borisjuk's office.

2.4 PLAN REVIEW AND AMENDMENT

The BMP Plan shall be modified whenever changes at North White Plains Yard increase the potential for releases of toxic or hazardous pollutants or where actual releases indicate the plan is inadequate. The BMP Plan will be revised within six months of each review to include any new or more effective

management systems or structural measures, as appropriate. The plan will also be reviewed and amended more frequently, if required, whenever there is a change in the facility, operations, material storage, or maintenance procedures that could affect the potential for spillage of petroleum or other hazardous substances.

Once this plan is approved, any change in facility design, construction, operation or maintenance which will materially affect the facility's potential for releases of toxic or hazardous pollutants shall be reported (when required by regulation) to the NYSDEC and incorporated into a revised BMP to be sent to the NYSDEC.

2.5 ORGANIZATIONAL OVERVIEW

MNR consists of five divisions that report to the President. These are:

- Operations;
- Capital Programs;
- Finance and Administration;
- General Counsel; and
- Planning and Development.

In addition, there are the following five executive functions in the Office of the President:

- Affirmative Action;
- Government Relations;
- Labor Relations;
- Press Secretary; and
- Safety.

Several of these units have duties with environmental aspects that were examined during this evaluation. These groups and their functions are discussed below, while Table 2-1 provides a summary matrix of how environmental responsibilities are currently carried out by various departments and divisions in the railyard.

Department of Environmental Compliance and Services

A major reorganization of the environmental, health and safety functions within MNR was implemented in June 1999. Up until this time, environmental compliance functions were provided by the Safety Department. The reorganization provides more support, required by MNR's five divisions, in a more cohesive manner. To accomplish this goal, a new Department of Environmental Compliance & Services (DECS) was established within the General Counsel's Division.

The activities supported by the DECS are as follows:

- Environmental Site Assessments
- Environmental Permitting
- Environmental Impact Reviews
- Remedial Activities/Corrective Actions
- New Project Reviews
- Environmental Compliance Management
- Environmental Program Development
- Environmental Audits
- Spills/Discharge Reporting and Control
- Training/Environmental Awareness
- Historic Preservation
- Compliance with the Americans with Disabilities Act (ADA)
- Management of Environmental Contracts
- Coordination with Metropolitan Transportation Authority (MTA) Agencies on Environmental Issues
- Community Relations on Environmental Issues

Five MNR employees staff the DECS. The Department is led by Karen Timko, the Director of the DECS, Ken McHale, the Assistant Director of DECS, Gail Silke, the Administrative Assistant for the DECS, and Joanne Reilly and Sara Gianazza, Managers of the DECS. Ken McHale oversees RCRA, wastewater systems, new facility projects, spill cleanup and reporting, remediation site cleanup, annual training, and other environmental programs. Joanne Reilly is responsible for BMPS, SPCC/SWPPP, New Facility Projects, TSCA/PCB Uses; as

well as numerous other environmental programs. Ms. Gianazza is responsible for Air Resources, EPCRA, Pesticide Management, and other environmental programs. In addition, staff member Jennifer Barry is an Assistant Director responsible for all of MNR's ADA issues, and, to a lesser extent, historic preservation and wetlands issues.

The DECS's responsibilities extend throughout the entire railroad network, covering the four yards evaluated in this project, as well as other facilities in both New York State and Connecticut not covered by these studies. With few exceptions, there are no environmental personnel at the yard that are assigned solely to specific environmental duties.

The Safety Department will support MNR's Health and Safety programs as well as the railroad's lead and asbestos abatement activities. The DECS and Safety Department frequently work together on issues that have both environmental and health and safety aspects.

TABLE 2-1

METRO NORTH COMMUTER RAILROAD
MATRIX OF INVOLVEMENT
NORTH WHITE PLAINS YARD ENVIRONMENTAL FACILITIES AND ACTIVITIES

ENVIRONMENTAL PROGRAM	DECS	CAPITAL PROGRAMS	OPERATIONS MAINT. OF WAY	OPERATIONS MAINT. OF EQUIP. (MECHANICAL)	FINANCE & ADMIN. MATERIALS MGMT.	FINANCE & ADMIN. TRAINING	OPERATION SERVICES WEST OF HUDSON
Tank Management	X	X	X		X		
Waste Drum Accumulation	X	X	X	X	X		X
Vehicle Fueling Station	X	X	X	X	X		
Locomotive Fueling	X	X	X	X	X		X
MSDS	X		X	X	X		
Raw Materials Drum Storage			X	X	X		X
Right-to-Know/ HazCom		X	X	X	X	X	X
Training	X	X	X	X	X	X	X
Sewage Holding/Pumping	X	X					X
Industrial Holding	X		X				
Electrical Transformers	X		X				
Water Supply System	X	X	X				

Section 3

3.0 FEDERAL AND STATE REGULATIONS

North White Plains Yard is required to develop and implement a BMP Plan in accordance with MOU requirements. A BMP Plan has been developed which is consistent with a protocol described in the MOU.

A comprehensive environmental regulatory review was conducted at the North White Plains Yard in 1996. All major federal and state regulatory programs were addressed and findings noted in a report titled "Environmental Compliance Review". The initial Draft Report was submitted to the DEC on December 8, 1996 and approved by the DEC on January 6, 1999.

MNR has addressed the issues raised in the Environmental Compliance Review through a Corrective Action Plan (CAP) for North White Plains Yard. This CAP was submitted to the DEC on October 14, 1999 and is still under review. A report following up on issues addressed in the CAP is due by December 15, 2001.

The federal and state programs evaluated during these comprehensive reviews are listed in Table 3-1 at the end of this section. Pertinent to the development of the BMP is the depth of review, which has occurred as part the above activities. MNR has not duplicated requirements as part of the BMP, rather the BMP has been developed to supplement the compliance requirements at the yard.

TABLE 3-1

FEDERAL AND STATE LAWS, RULES AND REGULATIONS

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

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 (6NYCRR 373-1, 6NYCRR 373-2)

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)

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

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)

Section 4

4.0 BMP IMPLEMENTATION

The BMP Plan will be implemented at North White Plains Yard through the coordinated efforts of the BMP Committee, BMP inspection teams and others responsible for pre-existing inspection programs. This multi-tiered format has been developed to permit implementation of the BMP Plan in a thorough manner. Roles and responsibilities of the groups included in BMP implementation are discussed in the following paragraphs.

4.1 BMP COMMITTEE

The BMP Committee will be comprised of personnel from North White Plains Yard who possess knowledge and have experience regarding the facility's organization, function, layout, and infrastructure. A list of the current key BMP Committee members is included in Appendix B.

Joanne Reilly will chair the BMP Committee along with Nelson Rodrigues and Lova Borisjuk. These representatives will be the primary BMP coordinators with direct responsibility for organization of the BMP Committee, and implementation of the provisions/intent of the BMP Plan. The BMP Committee Chairperson, Joanne Reilly, will be responsible for assigning tasks, ensuring adequate communications between Committee/Team members, and periodically evaluating the effectiveness of the BMP Plan and modifying the plan as necessary. The other team members to assist from the North White Plains Mechanical Department are as follows: Al Young (Material Coordinator), Ray Calore (General Foreman), Chris Singh (General Foreman), Jay Adessa (Foreman, Freight Shop), and Will Clark (Foreman Freight Shop). In addition, other team members to assist from the Maintenance of Way Department are Stanley Dabrowski (Supervisor of Work Equipment), Ken Perotti (Shop Foreman), and Frank Pellegrino (Parts Foreman). Supporting members of the C & S Department include Anthony Forcina (Facility Supervisor) and Derek Hill (Supervisor of Work Equipment).

By design, as outlined by the USEPA's BMP Guidance Manual, North White Plains Yard management will have overall responsibility for successful implementation of the BMP Plan.

BMP Committee Responsibilities

The BMP Committee's activities and responsibilities are focused on the following areas:

- developing the BMP plan and assisting in its implementation, periodic evaluation and modification to address new site conditions;
- dissemination of BMP information to other involved groups (i.e., BMP Inspection Team, DECS, Fire Protection);
- coordination of the selection, function, and responsibilities of the BMP Inspection Team;
- reporting to the Director of DECS on an annual basis or whenever necessary;
- reporting to the Assistant Director – DECS and Environmental Management Committee on a periodic basis;
- review of new construction, demolition plans, renovations and equipment modifications which could have an impact on stormwater quality;
- review of all BMP inspection reports, spill reports, and other pertinent incident reports with subsequent investigation and coordination of corrective actions; and
- development of BMP inspection and recordkeeping procedures.

The following BMP Committee responsibilities will be coordinated/completed primarily by the BMP Committee Chairperson:

- coordinating all regulatory inquiries, correspondences, and inspections related to the BMP Plan;
- developing and disseminating specific BMP procedures (i.e., bulk fuel unloading procedure, virgin material control procedure, etc.); and
- evaluation of monitoring methods of the stormwater and industrial wastewater flows.

Section 5

5.0 RISK IDENTIFICATION AND ASSESSMENT

The risk identification process is the systematic tabulating of areas at North White Plains Yard with ongoing and/or potential releases to the environment. Risk assessment is a determination of the impacts of both current and potential discharges. Risk identification and assessment information was developed by Day Engineering and MNR for the North White Plains Yard by physically inspecting facility buildings and materials management areas. Individuals were also interviewed who were knowledgeable of specific areas.

5.1 IDENTIFIED RISK AREAS

Based upon information obtained during the risk assessment performed by Day Engineering, existing facility documents were reviewed pertaining to the historical uses of the North White Plains Yard site, such as their Stormwater Pollution Prevention Plan (SWPPP) and Spill Prevention Control and Countermeasure (SPCC) Plan. North White Plains Yard facilities were toured and interviews were held with departmental personnel responsible for the specific operations identified as potential sources of releases of contaminants to water or land. The purpose of the document reviews and personnel interviews was to inspect areas which were potential sources of contaminants, evaluate administrative procedures for managing the areas, and identify applicable best management practices.

5.2 SITE ACTIVITIES AND OPERATIONS

5.2.1 West Side Facility Operations

Facility operations 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 pump station, indoor and outdoor materials storage, a pre-fabricated hazardous and industrial waste accumulation units, power substation, and an old circuit breaker house (currently used as Third Rail Crew Quarters). A location by location description of operations on the west side of the NWP follows.

Maintenance of Way Building

The Maintenance of Way (MofW) 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. The operations in this building involve the maintenance and repair of the heavy track 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 wastewater tank that is located on the north side of the Maintenance of Equipment (MofE) Building.

Track equipment that needs repair is steam-cleaned in the MofW equipment wash shed and then brought into the MofW 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 and a Safety Kleen unit. The floor drains in this room also discharge to the 10,000-gallon industrial wastewater tank.

There are three 2,000-gallon above ground storage tanks in the southwest corner of the building. One contains virgin hydraulic oil, the second contains virgin 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.

There is a boiler room located in the north end of the MofW Building. The boiler room was constructed in May 1991 by Metro-North in the area of the former electric car shed as part of the MofW 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 MofW Building and the MofE Building. The tank

was installed in 1989. 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 wastewater tank located to the northeast of the boiler room.

10,000-Gallon Industrial Wastewater Tank

As noted above, all of the floor drains from the MofW Building discharge to a 10,000-gallon underground wastewater tank located outside on the north side of the MofE Building. The tank also receives incidental rainwater runoff from the yard area outside of the MofW Building. The tank has a leak detection system and level alarm, which is located in the MofW 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.

MofW Equipment Wash Shed

The MofW equipment wash shed is located just to the south of the MofW building. The wash shed was constructed in 1991 as part of the MofW 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 wastewater 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, within a canopied secondary containment, 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.

MofW 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 MofW track maintenance equipment storage. This includes rail maintenance equipment, small backhoes and trench diggers and, at various times, may also include miscellaneous materials such as concrete ties.

Maintenance of Equipment Building

The Maintenance of Equipment (MofE) Building Shop is located just to the northeast of the MofW Building and was constructed before the MofW Building between 1986 and 1988. Like the MofW Building, all of the floor drains in the MofE Building discharge to the 10,000-gallon underground industrial wastewater tank located on the north side of the building.

The operations in the MofE Shop include: car repairs and modifications, as well as painting and 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. The MofE 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 MofE 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.

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.

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 the following: empty drums and standby overpacks on palettes, drums containing virgin oil, ethyl alcohol, Miracle Mike (a detergent) and drums containing spare parts.

Stormwater

Stormwater from the roof drains and the parking lot storm drains on the west side of the NWP Yard discharges to the Bronx River. 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.

Sewage Pump Station

Sewage from toilets in the train passenger cars discharges by gravity hook-up through a sewage manifold pipe system to a sewage pump station and continues east of the M of E building and adjacent to the main tracks. The sewage is subsequently discharged to a main sewer line that ultimately discharges to the Westchester County Trunk Sewer. The sanitary wastes from buildings in the NWP Yard also discharge to the county system. The sewage collection system and pump station were constructed between 1987 and 1988 and were put into operation in 1988.

Prefabricated Waste Accumulation Units

There are three prefabricated hazardous and non-hazardous industrial waste accumulation units located on the western side of the NWP Yard. The units have secondary containment. MNR periodically utilizes a permitted waste hauler to transport these wastes off site to facility permitted treatment and disposal facilities. The units accumulate lead/acid batteries for recycling; combustible materials, sorbents with oil, as well as materials to be characterized which may include paints/thinners from the paint shop, flammable liquids and solvents.

Outdoor Tie Consolidation

Adjacent to the accumulation units is an area where concrete ties are temporarily consolidated on an as-needed basis to be loaded and track work equipment in support of ongoing track maintenance projects.

Power Substation B-23

This traction power substation, which supplies power to the third rail, is located on the southwestern side of the NWP Yard. 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.

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 Power Department crews as crew quarters. Third rail parts are stored adjacent to one of the trailers.

Signal Generating Substation (S-23)

The Signal Generating Substation is located south of the Power Substation at the southwestern end of the NWP Yard. 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.

Former Circuit Breaker House

The Former 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.

Bulk Storage and Transfer Areas

A summary of the existing petroleum bulk storage tanks found at the NWP Yard is found in the Tank Management Plan, located in Appendix D. There are currently eleven 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.

5.2.2 *East Side Facility Operations*

East side facility operations include: the Yard Office (Trainmen and Engineers Building), an automotive fueling facility, the Communication and Signal Building, prefabricated hazardous and non-hazardous waste accumulation unit, a hazardous/industrial material storage building, and an electrical substation. A detailed description of these operations on the east side of the NWP Yard follows.

Train and Engine Building

The Trainmen and Engineers (T and E) Building, designated as the Yard Office, 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 and crew quarters for train crews.

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.

Communications and Signal Building

The Communications and Signal Building was constructed in 1994. The building houses the North White Plains branch office of the Department of Environmental Compliance Services, a boiler room, the C & S Dept. Shop and the C & S Training Center, C & S and Track Structures Dept., Dept. offices, and crew locker rooms.

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 wastewater tank located on the east side of the C & 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 & 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 wastewater 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.

Automotive Fueling Facility

This facility, constructed in 1992, is located just to the south of the C & S Building. 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 secondary containment system.

Prefabricated Accumulation Units

Metro-North installed two prefabricated units for hazardous and non-hazardous industrial waste accumulation for the "Harlem Line Right-of-Way and NWP-East" facility, of which the east side of the yard is part of, and virgin material storage for the C & S Department. These units are located to the northwest of the C & S Building, adjacent to the C & S Building outdoor equipment storage area. The units have secondary containment and automatic fire suppression, 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.

Substation B-24

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

Track and Structures Department Storage

There are two areas along the eastern side of the yard property that are used by the Track and Structures 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 terminus of the yard tracks, consists of three trailers for parts/equipment storage.

Stormwater

Stormwater runoff on the east side of the NWP Yard generally flows into storm drains which discharge to municipal storm drains located along Fisher Lane. Ultimately, stormwater discharges to the Bronx River. Stormwater infiltration also occurs through the porous pavement in the parking areas located just south

and to the north of the C&S Building. The design of this pavement is to prevent unnecessarily overtaxing the municipal storm drain.

Bulk Storage and Transfer Areas

North White Plains Yard is covered under a Tank Management Plan developed by MNR. The bulk storage and transfer areas at North White Plains Yard are detailed in this plan. The plan, updated in December 2000, is located in Appendix D. The Tank Management Plan identifies procedures for the handling and management of petroleum storage tanks at North White Plains Yard, such as testing, emergency spill response, inspections and monitoring. The plan also provides copies of the documentation required by the outlined procedures.

5.3 STORMWATER DRAINAGE AND MANAGEMENT

The facility has a Stormwater Pollution Prevention Plan (SWPPP), which is required by the State due to their SPDES General Permit (#GP-98-03). The SWPPP dated September of 1996, and updated in April of 2001, identified risk areas where facility operations may introduce pollutants into stormwater runoff. Outfalls, catch basins, and the overland stormwater direction of flow are shown in a Site Plan, located in Figure 1 of the SWPPP (Appendix C).

5.4 RECOMMENDED BMPS

This section discusses areas that present a release potential and offers recommendations. The potential pollutants utilized by the operation are categorized, analytical data which confirms the presence of these contaminants reviewed (where available), and BMPs are specified which will reduce or eliminate the potential for pollutant releases.

The authority to implement the recommended BMPs lies with the North White Plains Yard management. The BMP Committee will be responsible for development and maintenance of the BMP Plan and will make recommendations to the management in the selection and implementation of the suggested practices.

The issues discussed and the BMP recommendations presented in the BMP Plan will be used as baseline information by the BMP committee, and will be employed to establish a corrective action project list.

The BMPs are addressed in further detail in Table 5-1 at the end of this section. This table is a consolidation of BMP information from the Environmental Compliance Review (ECR) audit findings, site activities list, bulk storage areas list, and other findings. The table identifies each BMP and its source. Additional BMP requirements and applicable sections of the BMP Plan which mitigate the issues/findings are also included in Table 5-1.

TABLE 5-1

METRO NORTH COMMUTER RAILROAD BMP SUMMARY
NORTH WHITE PLAINS YARD ENVIRONMENTAL FACILITIES AND ACTIVITIES

BMP ID	TYPE - Site Activity - ECR Audit Finding - Bulk Storage - Other	BMPs/ Additional BMP Requirements	Applicable Sections of BMP Plan which Mitigate BMP Issues/Findings
Boiler Room – West Side Yard Operations	- ECR Finding BMP-1NWP - Bulk Storage	- Develop plan to provide secondary containment for fill port area. - Develop procedures to control spills and temporarily seal or cover the stormwater sewer drain during filling operations. - Train personnel in procedures to be followed in the event of a spill or reference appropriate facility plan.	Appendix D – Tank Management Plan Appendix E – SPCC Plan
Dumpster Area – West Side Yard Operations	- ECR Finding BMP-2NWP - Other	- Develop housekeeping procedures to keep areas around solid waste dumpsters free of trash. - Develop plan to provide leak-proof containers for all non-hazardous solid waste that may contain liquids.	Section 9.0-Good Housekeeping Section 10.0-Inspections and Recordkeeping

BMP ID	TYPE - Site Activity - ECR Audit Finding - Bulk Storage - Other	BMPs/ Additional BMP Requirements	Applicable Sections of BMP Plan which Mitigate BMP Issues/Findings
Maintenance of Way Work Equipment Shop – East Side Inside Wall of Shop (West Side)	- ECR Finding BMP-3NWP - Other	- Determine material contents and possible waste classification (ie., if the material is a waste) of all waste drums on site. - Develop procedures to transport and properly dispose of any waste drums in an approved off-site facility.	Section 9.0-Good Housekeeping Section 10.0-Inspections and Recordkeeping
Paint Shop – Drains in Paint Shop (West Side)	- ECR Finding BMP-4NWP - Other	- A written procedure is needed to document and control the following practice: plugging drains during painting & stripping operations and vacuuming waste out of drains into drums for disposal (when drains are full or when operations stop). - Train MNR personnel in the implementation of this process afterward.	Section 9.0-Good Housekeeping Appendix E-SPCC Plan Section 6.0-Training
Small Repair Engine Shop – Dynamometer Room (West Side)	- ECR Finding BMP-5NWP - Other	- Provide secondary containment for any 55-gallon drums near floor drains.	Appendix E-SPCC Plan
Small Repair Engine Shop – West Side	- ECR Finding BMP-6NWP - Other	- Mark all waste oil drums appropriately.	Appendix E-SPCC Plan

BMP ID	TYPE - Site Activity - ECR Audit Finding - Bulk Storage - Other	BMPs/ Additional BMP Requirements	Applicable Sections of BMP Plan which Mitigate BMP Issues/Findings
Maintenance of Way Work Equipment Shop – West Wall of Shop (West Side)	- ECR Finding BMP-7NWP - Bulk Storage	- Develop plan to confirm that drain from this containment area discharges to the industrial wastewater UST. - Develop procedures to ensure that containment provides sufficient temporary storage until potentially spilled material can drain into wastewater tank.	Appendix D – Tank Management Plan Appendix E-SPCC Plan Section 10.0-Inspections and Recordkeeping
Maintenance of Way Equipment Wash Shed – West Wall of Shed (West Side)	- ECR Finding BMP-8NWP - Bulk Storage	- Properly label Tank 14F.	Appendix D – Tank Management Plan Appendix E-SPCC Plan
Maintenance of Way Work Equipment Shop – West Wall of Shop (West Side)	- ECR Finding BMP-9NWP - Other	- Develop procedures to ensure that only one drum containing waste be stored in a satellite accumulation area at one time. In addition, procedures should ensure that potentially ignitable waste material be stored separately from other incompatible or potentially ignitable materials/chemicals.	Section 8.0–Material Compatibility

BMP ID	TYPE - Site Activity - ECR Audit Finding - Bulk Storage - Other	BMPs/ Additional BMP Requirements	Applicable Sections of BMP Plan which Mitigate BMP Issues/Findings
Paint Shop – West Side	- ECR Finding BMP-10NWP - Other	- Develop procedures to ensure that only one waste drum be stored in a single satellite storage area at one time. Separate satellite storage areas should be established in the Paint Shop to accommodate the need for multiple waste drums, if they must exist.	Section 6.0-Training Section 9.0-Good Housekeeping Section 10.0-Inspections and Recordkeeping
Facility Wide – All Areas	- ECR Finding BMP-11NWP - Bulk Storage	- Update, finalize and distribute the tank management plan. The plan should include a method for changing the plan when tanks are added or deleted and include instruction on purpose and use of the plan for affected MNR personnel.	Appendix D – Tank Management Plan
Maintenance of Way Work Equipment Shop – All Areas	- ECR Finding BMP-12NWP - Other	- Develop procedures to dispose fluorescent light bulbs generated in various shops and bldgs.	Harmon Yard Waste Management Plan – Being Finalized
Facility Wide – All Areas	- ECR Finding BMP-13NWP - Other	- Evaluate and institute an accounting system so shops are accountable for wastes generated.	Harmon Yard Waste Management Plan – Being Finalized

BMP ID	TYPE - Site Activity - ECR Audit Finding - Bulk Storage - Other	BMPs/ Additional BMP Requirements	Applicable Sections of BMP Plan which Mitigate BMP Issues/Findings
Facility Wide – All Areas	- ECR Finding BMP-14NWP - Other -	- Develop and implement a waste management plan. Integration of this plan with other MNR railroad yards should be considered.	Harmon Yard Waste Management Plan – Being Finalized
Overhead Line Department – Line Gang Trailers (East Side)	- ECR Finding BMP-15NWP - Site Activity	- Recommend testing and labeling of transformer units to confirm absence of PCBs.	Section 9.0-Good Housekeeping
Substation B-24 – Outdoor Transformer Area (East Side)	- ECR Finding BMP-16NWP - Site Activity	- Secondary containment for outdoor transformers is not required but is recommended as a BMP.	Section 8.0-Material Compatibility Section 9.0-Good Housekeeping
Substation B-24 – Inside Substation	- ECR Finding BMP-17NWP - Other	- Develop a uniform waste disposal policy for used batteries.	Harmon Yard Waste Management Plan – Being Finalized
West Side: Maintenance of Equipment Shop East Side: C&S Storage Area	- ECR Finding BMP-18NWP - Other	- Develop procedures to ensure that the storage of empty drums is located in an enclosed area. - Develop procedures to provide absorbent pads beneath empty drums while in storage, awaiting transportation to Harmon Yard. - Develop procedures to characterize automotive fueling pad sump waste	Section 9.0-Good Housekeeping Appendix E-SPCC Plan

BMP ID	TYPE - Site Activity - ECR Audit Finding - Bulk Storage - Other	BMPs/ Additional BMP Requirements	Applicable Sections of BMP Plan which Mitigate BMP Issues/Findings
		oil/water drums and dispose of properly. - Develop procedures to provide secondary containment for all waste drums being stored in this area.	

Section 6

6.0 TRAINING

As outlined in the EPA's Best Management Practices Guidance Document, an employee training program should instill in personnel, at all levels of responsibility, a complete understanding of the BMP Plan, the process and materials with which they are working, the safety hazards, the practices for preventing discharges, and the procedures for responding properly and rapidly.

These programs provide information; establishing work practices and procedures to give employees the awareness needed to work safely with potentially hazardous chemicals. Extensive regulatory-driven training targets are detailed in Table 6-1 at the end of this section. The groups who should be trained and the frequency of training are also shown in Table 6-1.

Employees involved with the operation and maintenance of the empty drum storage areas and fueling of trains are subject to training.

6.1 GENERAL TRAINING

Pollution prevention training for Metro-North Railroad employees and refresher courses are held annually addressing the following topics:

- Inspections
  - Familiarize employees with areas to be inspected
  - Introduce inspection checklist
  - Discuss recordkeeping of inspections
  - Discuss scheduling of inspections

- Good Housekeeping
  - Review and demonstrate basic drum storage and clean-up techniques; proper maintenance of the industrial material secondary containment areas.
  - Discuss scheduling of housekeeping activities.

- Preventive Maintenance
    - Familiarize employees with areas to be maintained
    - Introduce maintenance checklist
    - Discuss recordkeeping of maintenance
    - Discuss scheduling of maintenance

- Spill Prevention and Response
    - Identify potential spill areas and drainage routes
    - Familiarize employees with past spill events (re: why they happened and the environmental impact)
    - Post warning signs in spill areas with emergency contacts and telephone numbers and reinforce that the Chief Train Dispatcher and other designated contacts must be contacted immediately in the event of a spill event.
    - Introduce the Spill Response Coordinator and introduce his "team"
    - Post the locations of spill clean-up equipment and the persons responsible for operating the equipment

- Materials Handling and Storage
    - Identify hazardous materials and their locations
    - Review information on container labels
    - Tell employees to use oldest materials first
    - Explain recycling practices
    - Demonstrate how valves are tightly closed and how drums should be sealed
    - Control inventory amounts by not over ordering or over stocking

Specific Training Components by Group

The BMP Plan addresses practices at the facility at all levels of responsibility. Information needs and training targets differ at different levels of responsibility. As described above, training for the employees involved at the North White Plains Yard, targets a variety of groups to maximize BMP awareness and understanding.

The various groups, which require training, are listed below.

- BMP Committee;
- Management; and
- Other Groups as required

BMP Committee

The BMP Committee is comprised of support/supervisory personnel who have a thorough knowledge of the facility and its operations. This committee is responsible for overseeing BMP related issues and making BMP recommendations when necessary.

Training for the BMP Committee will be conducted periodically and consist of the following:

- Review of the BMP and BMP objectives;
- BMP Committee responsibilities;
- Highlights of previous spill events or failures;
- Any recently developed BMP precautionary measures;
- Incident reporting protocols;
- BMP inspection program coordination;
- Housekeeping;
- Material compatibility;

- Preventive maintenance;
- Inspections and records;
- Completion of inspection forms;
- Stormwater system and other receptors; and
- BMP Plan evaluation.

North White Plains Yard General Training

Training for employees who are responsible for the North White Plains Yard consist of awareness training which will be a part of routine annual training. The awareness training will assure adequate understanding of the objectives of the BMP plan and the individual responsibilities of each employee. Previous spill events or failures and recently developed BMP precautionary measures will be highlighted. Employees will be made aware of health risks of chemicals utilized at the facility.

Other Groups

There are a variety of inspection groups that visit the North White Plains Yard. These groups include numerous division, department, and building inspection teams. Just as with the security and fire rescue groups, training of these groups will be aimed at making these teams aware of BMP issues and instructing them on how to conduct a BMP inspection while they are conducting their normal inspections. Training for these groups will include, as appropriate for their areas:

- Housekeeping;
- Material compatibility;
- Material storage; and
- Recordkeeping and reporting to the BMP Committee.

In addition to the above-mentioned groups, provisions should be considered to train and supervise contractors and temporary personnel. Contractors and

temporary personnel will be briefed on the BMP Plan and made cognizant of incident reporting procedures and any pertinent BMP issues.

TABLE 6-1- TRAINING TARGETS

TYPE	REGULATIONS	WHO IS TO BE TRAINED?	FREQUENCY
	Clean Water Act (CWA)		
SPDES Permits	40 CFR 23 6 NYCRR 750	All personnel responsible for compliance with SPDES permits.	With permit issue (3 hours) Annual review (1 hour)
Oil Spill (SPCC) Plans	40 CFR 112.7	Facility personnel responsible for oil storage and transport	As plan is issued/ modified (2 hours) Annual review (2 hours)
Waterways, Rivers & Harbors	33 CFR 322	Project engineer planner.	Annual review (1/2 hour)
Stream Protection Act	6 NYCRR 608	Project engineers, construction personnel.	Annual review (1/2 hour)
Wetlands Permits	33 CFR 320-330 40 CFR 110 §404 6 NYCRR 663	Project engineers, planners, construction personnel.	With specific permit issue (1 hour) Annual review (1 hour)
Stormwater Control Permits/Requirements	40 CFR 122	Project engineers, construction, operating personnel.	Upon completion of Pollution Prevention Plan (2 hours) Annual review (1 hour)
	Clean Air Act (CAA)		
Air Construction/ Operating Permits (Stacks, Diesel Generators, Welding Hoods, Blueprint vents, Other Emission Vents, etc.)	40 CFR 70 6 NYCRR 200-230	All personnel responsible for operating in accordance with permit requirements.	Upon permit issue/modification (1 hour) Annual review (1 hour)
Air/Water Permitting	6 NYCRR 201 6 NYCRR 751	Operating and maintenance personnel, engineers, environmental personnel.	Biennial - General review of needs to obtain permits, permit applications, etc. (2 hours)

Section 7

7.0 BMP INCIDENT REPORTING

The North White Plains Yard is required to have an SPCC Plan since there are oils or petroleum tanks and drums stored on site by MNR as well as an industrial wastewater tank.

Incident Reporting

The following are general spill response guidelines to be implemented by the Discoverer of the spill and/or MNR employees who are responsible for the North White Plains yard.

- Assess the spill/leak/discharge and identify the source and product.
- Make a determination if an explosive/fire danger exists and whether the response can be performed using available manpower, materials, and equipment or whether additional support is needed.
- Notify the MNR Fire Department if explosive/fire danger exists.
- When a response can be made safely, stop the flow from reaching waterways and stop/mitigate the source of the spill.
- Notify immediate supervisor, CRTC, and DECS, as soon as possible. Regulations require notification to regulatory agencies within 2 hours, so supervisor, CRTC, & DECS must be notified soon enough that they can make required reporting within 2 hours.
- Once under control, reassess the situation and develop and implement an action for clean-up.
- Contact the spill response contractor (SRC) if required.
- Decontaminate spill response equipment and dispose of product and contaminated materials in accordance with applicable regulations and with chain-of-custody documentation. If unsure of how to dispose of contaminated materials, call the DECS or the designated spill response contractor for assistance.

A history of spill occurrences at North White Plains Yard is included in MNR's SPCC plan, which is referenced in Appendix E.

Regulatory Agency Notification Triggers

The Procedure for Emergency Spill/Leak/Discharge Response and reporting Events/Conditions at North White Plains Yard outlines the Department of Environmental Compliance Service's role. The Discoverer of a Spill/Leak/Discharge shall report the Spill/Leak/Discharge directly to their Supervisor, MNR's Chief Rail Traffic Controller (CRTC), and the DECS. The DECS is responsible for reporting a Spill/Leak/Discharge to the National Response Center (see SPCC Plan in Appendix E), and the New York State Department of Environmental Conservation (NYSDEC). Note that as regulations require the reporting of a spill, within 2 hours of its discovery, prompt notification of the DECS is imperative so that this deadline can be met.

Certain events/conditions are required to be reported to the NYSDEC and the NRC (see SPCC Plan). The Discoverer of an Event/Condition is to notify their Supervisor, MNR's Chief Rail Traffic Controller (CRTC), and DECS. Upon reporting a reportable Event/Condition to their Supervisor, CRTC, and DECS, the Discoverer shall document the Event/Condition. The DECS shall be responsible for reporting the event/condition to the NYSDEC and/or NRC.

The following parties and regulatory agencies should be notified in case of a release incident as conditions dictate:

Oil Release - Discharges in harmful quantities to waterways of the State per NYCRR Part 613 and 40 CFR 110 must be reported (Definitions of harmful quantities and waterway is all encompassing - consequently all oil spills must be reported).

Chemical Release - Based on material type and reportable quantities listed in 6 New York Code of Rules and Regulations (NYCRR) Part 597 and 40 Code of Federal Regulations Part 117.

Call: Immediate Supervisor, MNR Chief Rail Traffic Controller (CRTC) – (800) 724-3004 (external), x2650 (internal), MNR DECS (914) 686-8681

MNR DECS will contact:

1. NYSDEC - Spill Hotline (must be reported within two hours of incident occurrence) (518) 457-7362,
2. NRC - (800) 424-8802,
3. Fleet Environmental (Spill Response Contractor) – (800) 562-7611 , as necessary
4. North White Plains Police/Fire Dept – 911, as necessary

Section 8

8.0 MATERIAL COMPATIBILITY

To ensure that materials are containerized, stored and worked with in a manner that prevents unwanted exposure to the environment, the compatibility and incompatibility of such materials must be addressed. Chemicals that are normally stable can react with the atmosphere or other materials and become hazardous. The result of stable chemicals becoming unstable can lead to release of materials into the environment. Chemicals can react with materials resulting in a change in state or physical property. A prime example of a possible reaction is the corrosion of a storage container resulting in a release of hazardous chemicals into the environment. The mixture of incompatible materials and/or chemicals may lead to equipment failure, production of toxic environments, fire, and in some cases violent explosions.

Often, the issue of compatibility is related only in terms of physical mixing of two dissimilar chemicals. Fires and explosions, which have been caused in facilities worldwide through inappropriate chemical mixing, illustrate the disastrous consequences of combining chemicals without prior evaluation of their compatibility.

The following information is presented to give some examples of materials that should not contact each other in a mixing or spill scenario. This information is applicable to both mixing of chemicals (e.g., in vessels) as well as storage of containerized materials.

- Acids that can form reactive or explosive products through crystallization should be recognized as potential hazards. Some examples are picric and perchloric acid.
- Chlorinated cleaning compounds mixed with ammonia will cause exothermic/ heat producing reactions and toxic environments. Mixing of these chemicals should not be performed (i.e., custodial staffs should be made aware of this).
- Flammable materials have a fire potential and their combustion products have the potential to produce toxic environments through thermal decomposition; they should be stored to minimize ignition.
- Compressed gases should be segregated by group (i.e. flammable, non-flammable, and oxidizers).

- Sodium hypochlorite (an ingredient found in bleach) introduced to an amine chemical (e.g. ethylenediamine, dimethylamine, o-toluene sulfonamide, diisopropylamine, diisobutylamine, hydrazine hydrate) can result in explosive reactions.

From the perspective of routine industrial operations, the following paragraphs offer guidance on proper consideration of compatibility during site activities, such as: construction, demolition, research, and manufacturing:

- Incompatible materials must not be placed into the same container.
- A material must not be placed into an unwashed container that previously contained an incompatible material.
- Welding operations should not be conducted proximate to 1,1,1-trichloroethane or other chlorinated solvents due to the potential for phosgene gas to result from their thermal decomposition.
- All new construction should be compared to existing plant engineering standards or recognized professional guidelines such as American Society of Testing and Materials, American Society of Mechanical Engineers, and American Institute of Chemical Engineers.
- Procedures and practices involving the mixing of chemicals should be engineered to eliminate or reduce the hazards of incompatibilities.
- All reviews of material and or chemicals for incompatibilities should be documented including any changes to procedures and materials construction.
- Chemicals contained in pipes, drums, or storage vessels should be reviewed for incompatibility with vacuum lines and machinery and receiving containers before removal/excavation of these units.
- Materials and their incompatibilities should be reviewed when process changes or engineering revisions are made. The review should include an evaluation of material handling procedures and chemical mixing.
- Non-routine tasks and procedures such as cleaning, shutdowns, and start-ups that involve chemicals or reactive materials should be reviewed for incompatibilities.

A fundamental procedural approach should be applied to ensure compatibility and prevent any negative outcome of incompatibility when handling materials and/or chemicals used at North White Plains Yard. When assessing the compatibility of a material for containerization or storage purposes, existing

information systems, such as those listed below, should be obtained for the materials being reviewed:

- Material Safety Data Sheets (MSDS);
- National Fire Protection Association (NFPA), and the National Institute for Occupational Safety and Health (NIOSH) Pocket Guide to Chemical Hazards;
- Information available in the DOT Emergency Response Guide and Dangerous Properties of Industrial Chemicals Book; and
- Poison Control Center (800-962-1253) (Newark, New Jersey).

Material compatibility is readily determined by reviewing the Material Safety Data Sheet (MSDS) for a material. The manufacturer can also be consulted.

In situations where the compatibility of materials cannot be ascertained, it is incumbent on the involved North White Plains Yard personnel to seek assistance from the Environmental Compliance and Services Department.

The issue of compatibility will be a component of future BMP Committee research and training. This section of the BMP Plan will serve as an introduction to the chemical compatibility issue for the BMP committee and others who will be involved with this issue.

Section 9

9.0 GOOD HOUSEKEEPING

Housekeeping considerations at North White Plains Yard include expediting removal of spilled material, neat and orderly storage of workstation and bulk stored materials, maintenance of adequate aisle space, and the prevention of material accumulation. Good housekeeping requires the maintenance of areas which may contribute pollutants to stormwater discharges in a clean, orderly manner. The most effective first step towards preventing pollution in stormwater from North White Plains Yard facilities involves common sense to improve basic housekeeping procedures. The following good housekeeping procedures are to be implemented.

- To ensure that pollutants from within the buildings are not inadvertently transferred to outdoor areas, employees will maintain dry and clean interior floor surfaces by using brooms, mops, and floor cleaning machines when necessary. Containers, drums, and bags will be stored away from direct traffic routes to prevent accidental releases that could potentially impact outside areas.
- Garbage and scrap materials in outdoor work areas will be regularly picked up and disposed. Materials that can be stored indoors will be removed from outdoor areas.
- Entrance/exit ramps from building interiors will be routinely cleaned with a floor cleaning machine to ensure that oil residue and dust are not tracked to outside areas by material handling equipment (e.g., fork trucks).
- Trash, wood, and scrap metal dumpsters in the outdoor storage areas will remain covered at all times other than during loading/unloading activities. These containers will be emptied regularly.
- Adequate aisle space will be maintained in storage sheds in the yard areas to facilitate materials transfer and easy access for inspections.
- Virgin materials and empty containers in storage sheds will be placed on pallets or similar devices to prevent corrosion of containers, from exposure to moisture on the ground.
- If any visible residue is observed on roof areas, it will be cleaned and source equipment inspected for malfunction.
- Information on good housekeeping practices will be incorporated into the facility's training program. As appropriate, employees will be informed of new housekeeping practices to be implemented through the posting of notices and through Division Managers.

Housekeeping ideas will also be instilled in employees through awareness training and by posting appropriate motivational signs. The awareness training will cover area-specific concerns (i.e., standing oil in machine vaults, equipment oil leaks, proper materials transfer techniques, etc.).

Housekeeping progress/status will be reviewed by the BMP Committee. Recurring problems will be specifically addressed by the BMP Committee through appropriate facility hierarchy. Cleaning activities will be performed by the facility's maintenance, operations, custodial, and contract employees/companies.

9.1 PREVENTIVE MAINTENANCE PROGRAM

Preventive maintenance involves the regular inspection and repair of North White Plains Yard equipment and structures that, when malfunctioning, could result in a release of pollutants to stormwater discharges.

Primary components of the North White Plains Yard preventive maintenance program, as it relates to release prevention, include the following types of equipment and systems:

- Aboveground and Underground Petroleum and Industrial Waste Storage Tanks and Pipelines
- Motor Vehicle/Automotive Fueling Station

Aboveground and Underground Petroleum Storage Tanks, Pipelines, and Gauges

Tank and pipe systems at North White Plains Yard inside and outside buildings are safeguarded by secondary containment, and contamination of stormwater from leaks or spills (other than catastrophic failure) is unlikely. These systems are regularly inspected and maintained as part of North White Plains Yard's Spill Prevention Control and Countermeasure (SPCC) Plan, located in Appendix E.

Aboveground and underground petroleum storage tanks and pipelines are inspected and tested in accordance with 6 NYCRR 613 & 614. Aboveground tank inspection forms are maintained and include checks on tanks, piping and valves, lighting, level indicators, etc.

Motor Vehicle/Automotive Fueling Station

Currently, a third party contractor manages, monitors, and stores records for all of MNR's automotive fueling facilities. These systems are regularly inspected and maintained as part of North White Plains Yard's Spill Prevention Control and Countermeasure (SPCC) Plan (Appendix E).

Section 10

10.0 INSPECTION AND RECORDKEEPING

The BMP Committee will conduct semi-annual inspections as deemed necessary. Inspections will typically consist of individuals from DECS Operations Division and Materials Department. In addition, inspectors may consist of a third party consultant. The purpose of BMP inspections is to identify actual and potential BMP issues and to identify areas where potential occurrences could occur. The results of the inspections will be captured by the BMP Committee who will prepare recommendations for corrective action.

In addition to semi-annual inspections, the facility will be under surveillance for BMP related issues by individuals conducting other program inspections. Specifically, the facility is constantly patrolled by various inspection personnel. Other individuals perform safety audits. These individuals will coordinate with the BMP Committee.

Inspection Components

Semi-annual inspections will evaluate the following items:

- Existing BMP concerns
  - corrective action progress;
  - reoccurrence;
- Material and Waste Storage Areas
  - container labeling;
  - container integrity;
  - leak prevention devices;
  - segregation/compatibility of materials;
  - potential for unintentional disturbance;
  - appropriate warning signs;
  - proximity of spill response equipment;
  - inappropriate stacking of containers;
- Housekeeping
  - prompt removal of spilled material;
  - neat and orderly storage of materials;
  - unidentified/orphaned containers;
  - adequate aisle space;

• Material Transfer Locations	-	evidence of spillage;
	-	adequate spill protection;
	-	careful material handling;
	-	leaking pipes, hoses, valves or fittings;
• Process Operations	-	discharges to sanitary sewer;
	-	and
• Spill Receptors	-	adequate diversion/protection from potential spills;
• Site drainage areas, parking	-	evidence of spillage; and
• Construction/Demolition Projects	-	all of the above issues.

Reporting and Recordkeeping

All deficiencies will be documented by the BMP Committee for review, evaluation and development of corrective action. Inspection report forms will be compiled and maintained for a minimum of three years.

Issue Resolution

The BMP Committee will oversee BMP issue resolution. The mechanism for corrective action tracking will be an active BMP project list. The list will set target interim and completion dates for all projects. The projects will be monitored by BMP inspectors during semi-annual inspections. Additional BMP preventative actions and facility improvements will be continuously added to the BMP project list as new issues are identified.

Section 11

11.0 SITE SECURITY

This Section describes the procedures and equipment required to prevent unknown or unauthorized entry of persons into North White Plains Yard property.

Security Systems

The North White Plains Yard facility is fenced, although the facility is in a relatively remote location and typically does not have a problem with unauthorized personnel being on-site. Most of the shop buildings are restricted access areas, and not open to the public. In general, plant security is adequate to protect against the potential for vandalism, which could result in discharges to waterways.

Lighting in the majority of the areas in North White Plains Yard is adequate. Adequate lighting is required in order for MNR personnel, and others (police, visitors, etc.) to easily observe spills both inside and outside the facility, and at the loading/unloading operations. It is recommended that MNR personnel continue to monitor that there is adequate lighting available near remote loading/unloading areas.

Section 12

12.0 ENVIRONMENTAL INCIDENT INVESTIGATION PROGRAM

Outlined below are guidelines for conducting incident investigations. Figure 12-1, in Appendix F, shows a possible format for an environmental incident investigation report, however, because of the variety of incidents investigated and the diversity of chemical operations, no attempt is made to provide a mandatory format for use in all situations. Rather, these guidelines address the following areas:

- Incident Reporting;
- Planning—Steps to Take Before an Incident Occurs;
- Management Responsibilities;
- Initial Response;
- Incident Investigation Team;
- Determining the Facts;
- Determining the Cause;
- Recommending Corrective and Preventive Actions;
- Follow-up Systems; and
- Communicating Results.

12.1 ENVIRONMENTAL INCIDENT REPORTING

Incidents cannot be investigated if they are not reported. A common reason that incidents go unreported is that, in some organizations, the incident investigation tends to be a search for the "guilty" rather than a search for the facts. When incident investigations are handled as a search for facts, the entire organization is more likely to work together to report incidents and to correct deficiencies, be they procedural, training, human error, managerial, or other.

When this approach is adopted, there will likely be an increase in the number of incidents reported. The objective is to get the situation into the open so the entire organization can work to correct deficiencies and prevent recurrence. With time, one would expect a reduction in the frequency of incidents.

For reporting purposes, an incident should be viewed as anything that occurs that is unusual or out of the ordinary. Initially, the information to be reported should be limited to what happened (date, time, description, size, impact, etc.) and the action(s) taken. Initial reporting should not be limited to apparently serious or potentially serious incidents because the seriousness cannot always be assessed at the time of occurrence. When all incidents are reported, those that are indeed serious or potentially serious can then be selected for further investigation.

12.2 PLANNING—STEPS TO TAKE BEFORE AN INCIDENT OCCURS

Effective incident investigation starts before an incident occurs with the establishment of a well-thought-out incident investigation procedure. The importance of preplanning is evident when one understands that the quantity and quality of relevant information begins to diminish immediately following the incident. By establishing the essential stages and steps of an incident investigation ahead of time, the loss of relevant information, thorough cleanup efforts or possible blurring of people's recollections, can be minimized and/or eliminated.

12.3 MANAGEMENT RESPONSIBILITIES

Management has a number of important responsibilities that lay the foundation for effective incident investigation. These responsibilities are:

- To communicate the importance and usefulness of incident investigation as one tool in the control of potential hazards;
- To create an atmosphere of trust and respect, which in turn leads to openness in reporting of incidents;
- To provide the resources and priority attention necessary to perform a thorough and comprehensive investigation;
- To communicate the results to all who may benefit; and
- To implement systems to ensure those actions are taken on the findings of the incident investigation to prevent recurrence.

12.4 INITIAL RESPONSE

The initial response to environmental, releases, should include: (1) providing medical and other safety and health help to personnel, (2) bringing the incident under control, and (3) directing activities related to the investigation in a way that preserves relevant information and evidence.

Activities to preserve information should include: securing and barricading the scene, initiating the collection of information, interviewing personnel, etc. Remember that information will begin to disappear or diminish immediately following the incident and the initial response should acknowledge and address this problem. Prompt establishment of incident investigation leadership with priority over operation, maintenance, and construction is vital at this stage.

12.5 INCIDENT INVESTIGATION TEAM

Prompt establishment of the incident investigation organization is of major importance to the incident investigation. The make-up of the investigation team is another important factor affecting the quality of the investigation. The appointment of competent people reflects management's commitment and helps ensure prompt and effective action during the investigation. The team chairperson should be someone who can effectively:

- Control the scope of team activities by identifying which lines of investigation should be pursued, referred to another group for study, or deferred;
- Call and preside over meetings;
- Assign tasks and establish timetables;
- Ensure that no potentially useful data source is overlooked; and
- Keep site management advised of the progress of the investigation.

Although team membership will vary according to the type of incident, a typical team investigating an operating area incident might include:

- A third-line or higher supervisor from the section where the incident occurred;

- Personnel from an area not involved in the incident;
- Engineering and/or maintenance personnel;
- The safety supervisor;
- A first-line supervisor from the affected area;
- Occupational health/environmental personnel;and
- Research and/or technical personnel.

It is also appropriate to consider and include other specialists and/or consultants either on a part-time or full-time basis.

12.6 DETERMINING THE FACTS

A thorough and comprehensive search for the facts is a necessary step in the incident investigation. During the fact-finding phase of the investigation, team members should:

- Visit the incident scene before the physical evidence is disturbed;
- Sample unknown spills, vapors, residues, etc. noting conditions which may have affected the sample;
- Prepare visual aids, such as photographs, field sketches, maps and other graphical representations with the objective of providing data for the investigation;
- Obtain on-the-spot information from eyewitnesses, if possible. Interviews with those directly involved and others whose input might be useful should be scheduled soon thereafter. The interviews should be conducted privately and individually, so that the comment of one witness will not influence the response of others;
- Observe "key" mechanical equipment as it is disassembled;
- Review all sources of potentially useful information. These may include as-built drawings, operating logs, recorder charts, previous reports, procedures, equipment manuals, oral instructions, change of design records indicating previous training and performance of the employees involved, computer simulations, laboratory tests, etc.;

- Determine which incident-related items should be preserved. When a preliminary analysis reveals that an item may have failed to operate correctly, was damaged, etc., arrangements should be made to either preserve the item or carefully document any subsequent repairs or modifications; and
- Carefully document the sources of information contained in the incident report. This will be valuable should it subsequently be determined that further study of the incident or potential incident is necessary.

12.7 DETERMINING THE CAUSES

Establishing the basic cause(s) of an incident is crucial to development of effective recommendations to correct and prevent a recurrence. Many methods can be used to sort out the facts, inferences, and judgments assembled by the investigation team. Even for incidents for which the cause appears obvious, formal analysis is recommended as protection against oversight or making premature and erroneous judgments. Outlined below is one approach that can be used to develop the cause and effect relationships.

- Develop the "chronology of events" which occurred before, during, and after the incident. The focus of the chronology should be solely on what happened and what actions were taken. List alternatives when the status cannot be definitely established because of missing or contradictory information;
- Identify conditions or circumstances which deviated from normal, no matter how insignificant they may seem;
- Identify all hypotheses of the causes of the incident based on these deviations;
- Test the hypotheses against all available evidence and information, and list in order of likelihood; and
- A "cause tree" approach similar to a "fault tree" can be somewhat helpful in depicting the many different failures that led to the incident under investigation. The "cause tree" helps ensure that failures are reduced to more basic or fundamental initiating events.

12.8 RECOMMENDING CORRECTIVE AND PREVENTIVE ACTIONS

Usually, recommendations for corrective and preventive actions follow in a rather straightforward manner from the cause (s) after they have been determined. A recommendation for corrective action has three important parts. The first is the recommendation itself, which describes the actions to be taken to prevent a recurrence of the incident. The second is the name of the person or position responsible for completion of the recommendation. The third is implementing the recommendations.

A number of recommendations may be prerequisites for safe operation, and thus will require completion before resuming operation. Others will involve areas needing additional work or study or may involve problems not directly related to the incident. For these, timing would extend beyond resumption of operations.

12.9 FOLLOW-UP SYSTEM

To ensure follow-up and closure of recommendations from an incident, (1) document the incident investigation findings; and (2) review the results of the investigation with appropriate personnel.

The incident documentation should address the following topics:

- Description of the incident (including date, time and location);
- Facts determined during investigation (including chronology, as appropriate);
- Statement of cause(s); and
- Recommendations for corrective and preventive actions (including timing and responsibility for completion).

Results of the incident investigation should be reviewed with appropriate operating, maintenance, and other personnel whose work assignments are within the facility where the incident occurred. In addition, depending on the seriousness of the incident, consideration should be given to reviewing results with other similar facilities to prevent occurrence there.

Section 13

13.0 MANAGEMENT OF CHANGE

The purpose of the Management of Change form is to assure that all changes related to hazardous processes are anticipated, assessed, managed and documented.

For the purpose of this section, the definition of "change" will include all modifications to equipment and procedures, including additions and deletions, but excluding "replacement in kind". Change also includes any modifications to an organization that may affect process safety. All such changes will be identified and reviewed by the BMP team prior to implementation. In order to allow the BMP Committee responsible member to have reasonable flexibility to maintain continuity of operation within established safe operating limits, the BMP member will be allowed to make necessary changes to process conditions that do not exceed the safe operating limits. Operation outside these limits, however, requires the following formal review and approval process:

- A Management of Change Form will be completed and submitted to the BMP Team for review and comment;
- A BMP Team meeting will be held to review the proposed change;
- Once each member of the BMP Team signs the change approval section of the Management of Change Form, the change will be allowed to occur; and
- The BMP plan will be revised in a timely manner to reflect process changes.

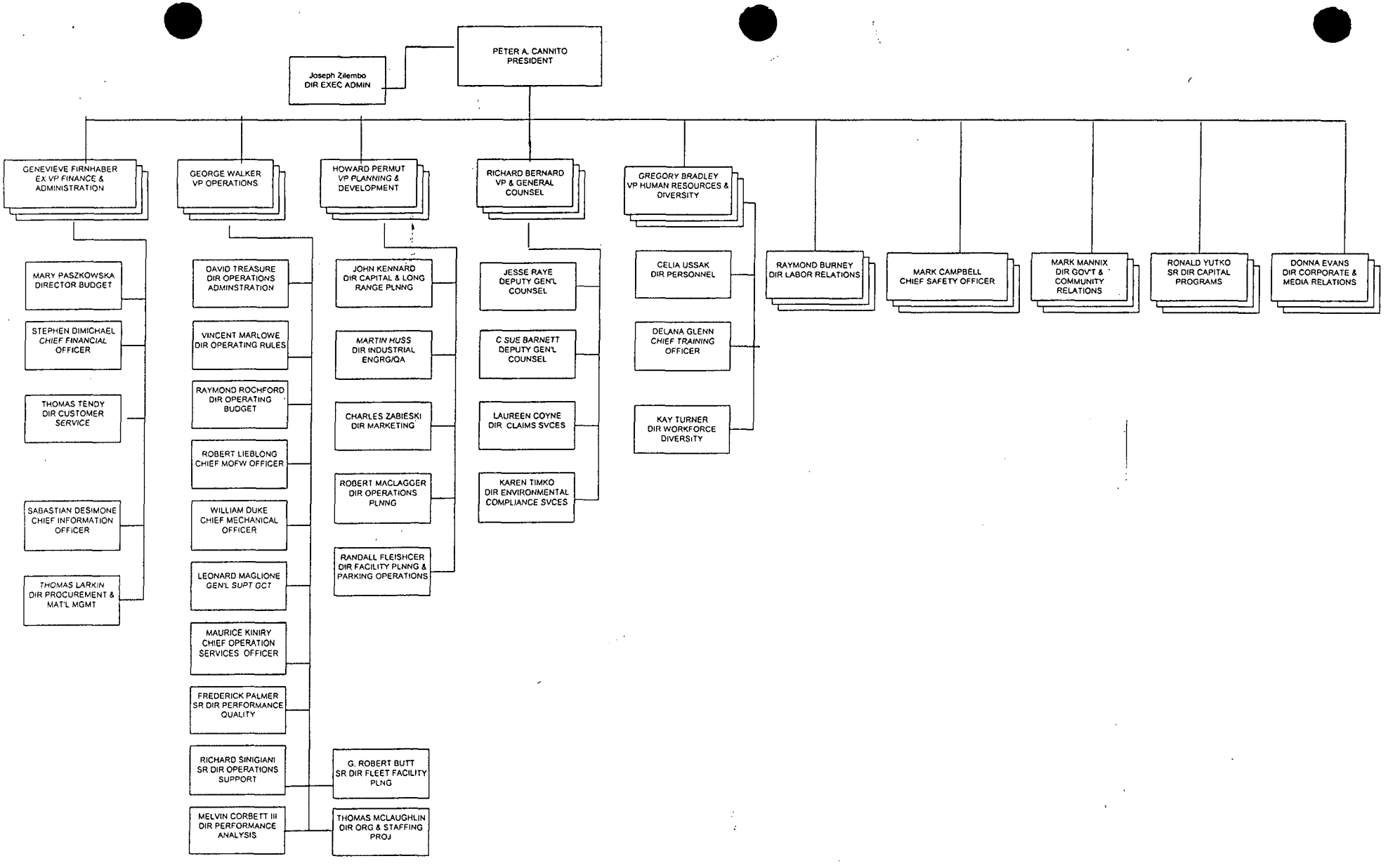
A blank Management of Change Form is included as Figure 13-1 in Appendix G.

Appendices

A

APPENDIX A

AUTHORIZED PERSONNEL


PETER A. CANNITO
PRESIDENT
Joseph Zilembo
DIR EXEC ADMIN
GENEVIEVE FIRNHABER
EX VP FINANCE & ADMINISTRATION
GEORGE WALKER
VP OPERATIONS
HOWARD PERMUT
VP PLANNING & DEVELOPMENT
RICHARD BERNARD
VP & GENERAL COUNSEL
GREGORY BRADLEY
VP HUMAN RESOURCES & DIVERSITY
RAYMOND BURNEY
DIR LABOR RELATIONS
MARK CAMPBELL
CHIEF SAFETY OFFICER
MARK MANNIX
DIR GOV'T & COMMUNITY RELATIONS
RONALD YUTKO
SR DIR CAPITAL PROGRAMS
DONNA EVANS
DIR CORPORATE & MEDIA RELATIONS
MARY PASZKOWSKA
DIRECTOR BUDGET
STEPHEN DIMICHAEL
CHIEF FINANCIAL OFFICER
THOMAS TENDY
DIR CUSTOMER SERVICE
SABASTIAN DESIMONE
CHIEF INFORMATION OFFICER
THOMAS LARKIN
DIR PROCUREMENT & MAT'L MGMT
DAVID TREASURE
DIR OPERATIONS ADMINSTRATION
VINCENT MARLOWE
DIR OPERATING RULES
RAYMOND ROCHFORD
DIR OPERATING BUDGET
ROBERT LIEBLONG
CHIEF MOFW OFFICER
WILLIAM DUKE
CHIEF MECHANICAL OFFICER
LEONARD MAGLIONE
GEN'L SUPT GCT
MAURICE KINIRY
CHIEF OPERATION SERVICES OFFICER
FREDERICK PALMER
SR DIR PERFORMANCE QUALITY
RICHARD SINIGIANI
SR DIR OPERATIONS SUPPORT
MELVIN CORBETT III
DIR PERFORMANCE ANALYSIS
JOHN KENNARD
DIR CAPITAL & LONG RANGE PLNNG
MARTIN HUSS
DIR INDUSTRIAL ENGRG/QA
CHARLES ZABIESKI
DIR MARKETING
ROBERT MACLAGGER
DIR OPERATIONS PLNNG
RANDALL FLEISHCER
DIR FACILITY PLNNG & PARKING OPERATIONS
G. ROBERT BUTT
SR DIR FLEET FACILITY PLNG
THOMAS MCLAUGHLIN
DIR ORG & STAFFING PROJ
JESSE RAYE
DEPUTY GEN'L COUNSEL
C SUE BARNETT
DEPUTY GEN'L COUNSEL
LAUREEN COYNE
DIR CLAIMS SVCES
KAREN TIMKO
DIR ENVIRONMENTAL COMPLIANCE SVCES
CELIA USSAK
DIR PERSONNEL
DELANA GLENN
CHIEF TRAINING OFFICER
KAY TURNER
DIR WORKFORCE DIVERSITY

Environmental & ADA Programs

Staff Member	Program	
Ken *Asst. Director*	MOU – EME	
	RCRA (Waste Mgt.)	
	WTP (Wastewater Treatment)	
	SWPP (Stormwater Poll. Prevent'n.)	
	Oversight & Orientation of Mgr. Pgrms.: TANK MGT. SARA MOU – BMP Spill Response SITE REMED. Air Resources MOU – SIRS Solid Waste (Recycling) TSCA / PCB	
	MOU - ECR / CAP (Overall)	
	Environmental Audit (Annual NYS)	
	New Facility Proj. Rvw.	
	Spill Response	
Joanne *Manager*	Tank Mgt.	
	MOU - SIRS	
	Site Remediation	
	MOU - BMP	
	TSCA / PCB	
	New Facility Proj. Rvw.	
	Spill Response	
	Buried Railroad Ties	
Sara *Manager*	S.A.R.A. – EPCRA	
	Solid Waste Management (Recycling)	
	New Facility Proj. Rvw.	
	Spill Response	
	Air Resources	
	Pesticide Mgt.	
	Croton Point Landfill PRP Action	
Jennifer *Asst. Director* *ADA*	A. D. A.	
	Wetlands Delineation	
	River Access	
	Historic Preservation	

B

APPENDIX B

BMP COMMITTEE MEMBERS

BMP COMMITTEE

Chair:	*Joanne Reilly*
CoChairs:	*Nelson Rodrigues*
	Lova Borisjuk

Committee Members:

Al Young	*Mechanical Department*	
Ray Calore	*"*	*"*
Chris Singh	*"*	*"*
Jay Adessa	*"*	*"*
Will Clark	*"*	*"*
Stanley Dabrowski	*Maintenance of Way*	
Ken Perotti	*"*	*"*
Frank Pellegrino	*"*	*"*
Anthony Forcina	*C & S Department*	
Derek Hill	*"*	*"*

APPENDIX C

STORMWATER POLLUTION PREVENTION PLAN

STORM WATER POLLUTION PREVENTION PLAN

METRO-NORTH RAILROAD
NORTH WHITE PLAINS YARD
NORTH WHITE PLAINS, NEW YORK

Prepared By: Day Engineering, P.C.
2144 Brighton-Henrietta Town Line Road
Rochester, New York 14623

Date: September, 1996
April 2001

Project #: 99-2884I

200339-3.3.1

I. GENERAL INFORMATION

1. **Facility Name:** Metro-North, North White Plains (NWP) Yard

2. **Facility Address:** 1 Fisher Lane
North White Plains, New York

3. **Type of Facility:** Transportation Facility - Passenger Railroad

4. **Person responsible for storm water pollution prevention at the facility (Storm Water Pollution Prevention Coordinator):**

Names:	Nelson Rodrigues	**Work Phone:**	914-686-8705
	Lova Borisjuk		914-686-8467
	Anthony Forcina		914-686-8520

Titles: Facility Supervisors
Emergency Phone: Chief Dispatch 212-340-2050

5. **Operating Schedule:** 24 hours per day

6. **Number of Employees:** Approximately 100

7. **Average Storm Water Discharge:** Estimate 2500 gallons/day

8. **Storm Water Permit Number:** GP-98-03

MANAGEMENT APPROVAL

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature _____
Name Nelson Rodrigues M of E
Title Facility Supervisor

Signature _____
Name Lova Borisjuk M of W
Title Facility Supervisor

Signature _____
Name Anthony Forcina C&S
Title Facility Supervisor

II. POLLUTION PREVENTION TEAM

Appendix 1 contains a table that identifies the individuals within the NWP yard that have been designated as members of the Storm Water Pollution Prevention Team. Mr. Nelson Rodrigues, Mr. Lova Boisjuk and Mr. Anthony Forcina are the Team Leaders and Ken McHale, of the Environmental Compliance and Services Department is the Storm Water Pollution Prevention Coordinator.

The members of the Storm Water Pollution Prevention Team are responsible for implementing the Storm Water Pollution Prevention Plan (SWPPP) and in assisting the plant manager in its implementation, maintenance, and revision, as required. The team shall implement the SWPPP by completing the following activities:

1) Conduct annual inspections to assess the effectiveness of the Plan. A report on this site inspection will be prepared and provided to the Plant Manager with any recommendations for improvements or Plan revisions. Copies of the site inspection reports will be added to Appendix 3 of the SWPPP.

2) Ensure that the Best Management Practices (BMPs), as recommended in Section VII of the SWPPP, are implemented.

3) Address spills into storm water as required to minimize their impact and to implement the necessary steps to help prevent recurring spills.

4) Meet semi-annually to discuss plan implementation and to address any concerns raised by Team members or other NWP personnel. Minutes of these meetings will be taken and retained for at least three (3) years by the Storm Water Pollution Prevention coordinator.

5) Ensure that annual training is completed as specified in Appendix 6 of this plan.

III. DESCRIPTION OF MATERIAL INVENTORY

Appendix 2 contains a table that summarizes a generic listing of the activities conducted that may be a source of storm water pollution on site, and materials used, stored, or produced on-site at NWP.

IV. SITE PLAN

Figure 1 is a site plan of the facility that includes the following information:

- a footprint of the buildings, structures, paved areas, and parking lots
- location of storm water discharge outfalls & name of outfall receiving waters
- locations of exposed significant materials
- predicted storm water flow directions

- outside storage areas for raw materials, by-products, and finished products

V. SITE VISIT AND IDENTIFICATION OF EXPOSED SIGNIFICANT MATERIALS

Appendix 3 contains a site visit description, with observations of those significant materials that appear to be exposed to activities that may be a source of storm water pollution on site and observations of the storm water outfall locations. Appendix 3 also contains a table that summarizes the significant materials that are, or have been, exposed to storm water pollution on site.

VI. SIGNIFICANT SPILLS AND LEAKS

There have not been spills or leaks of significant materials at NWP in the last three years, which have been exposed to storm water.

VII. IDENTIFICATION OF SOURCES OF STORM WATER POLLUTION AND BEST MANAGEMENT PRACTICES

Appendix 4 contains a table that lists the identified storm water pollutant sources, and a lists the existing management practices in place to address these sources. The third column of the table briefly outlines recommended Best Management Practice (BMP) options that will be incorporated into the Plan to help control/mitigate these pollutant sources. Appendix 4 also contains separate tables that contained detailed information regarding the BMPs for each source of pollution.

VIII. SCHEDULE FOR IMPLEMENTATION OF BMPs

Appendix 5 contains separate tables which list schedules for the implementation of the BMPs of each source of pollution.

IX. EMPLOYEE TRAINING PROGRAM

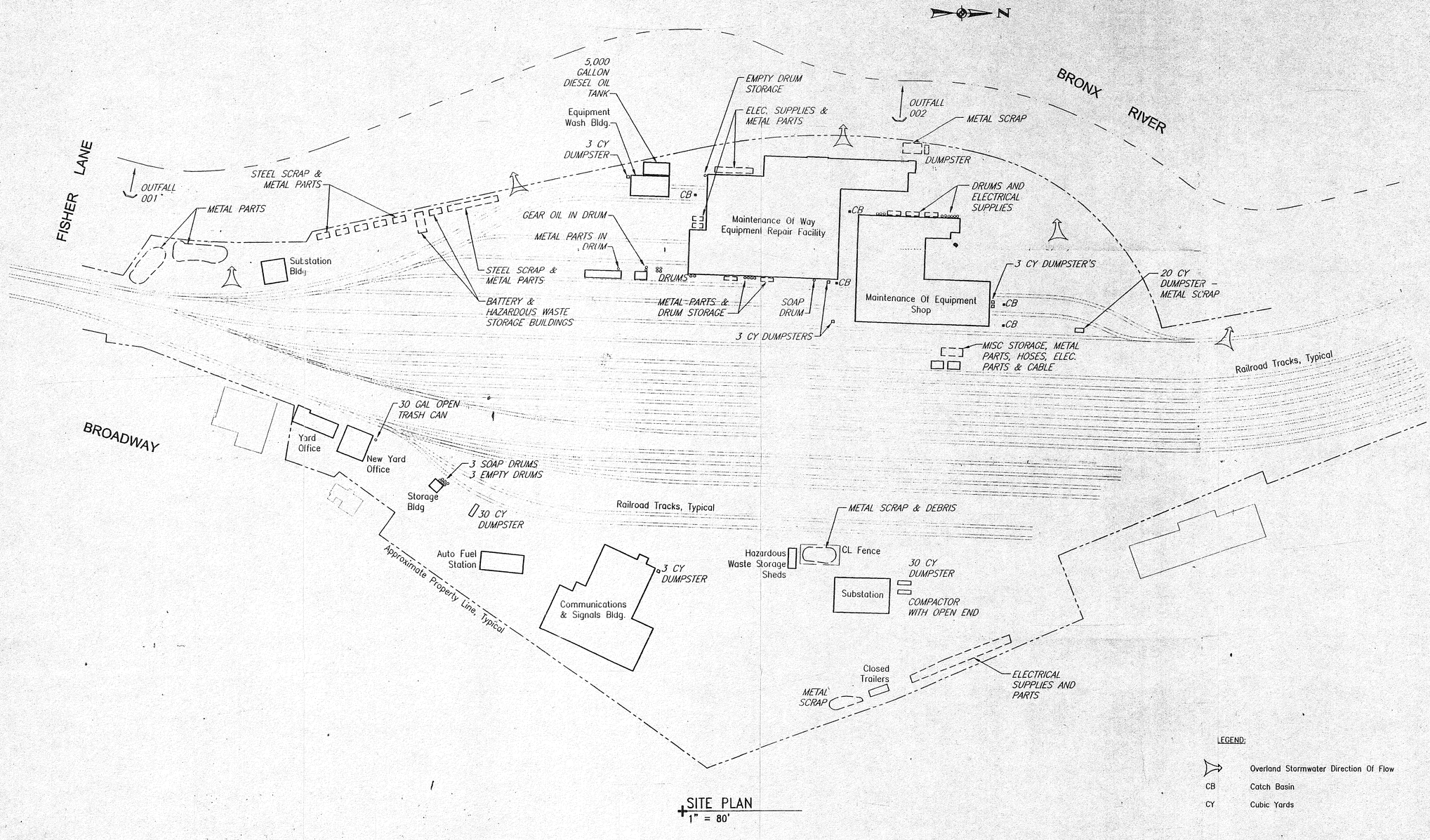
Appendix 6 contains a description of the training program, including the contents of the brief monthly meetings, and the in-depth pollution prevention training to be conducted annually. Appendix 6 also contains a table briefly listing training materials, and the scheduled date for the first in-depth training session.

X. CERTIFICATION

Appendix 7 contains a table for the non-storm water discharge assessment for outfalls 001 and 002. This assessment certification indicates that these outfalls do not contain non-storm water discharges such as process water, air-conditioner condensate, non-contact cooling water, vehicle wash water, or sanitary wastes.

FIGURE 1

SITE PLAN



SITE PLAN
1" = 80'

REFERENCE FILES ATTACHED:

REF1: Swpp-2.dwg	REF6:
REF2: SitePlan1.dwg	REF7:
REF3:	REF8:
REF4:	REF9:
REF5:	REF10:

FILENAME: \Metro\NorthWhitePlains\SWPP\Swpp-1.dwg
TIME PLOTTED: Fri Apr 06 12:10 2001

ANSI "D" (22x34)
DayEng_AnsiD

DESIGNED BY	DATE
CMS	03/2001
DRAWN BY	DATE DRAWN
TWW	04/06/2001
CHECKED BY	DATE
CMS	04/06/2001
APPROVED BY	DATE
CKP	04/06/2001
SCALE	DATE ISSUED
1" = 80'	04/06/2001

DAY ENGINEERING, P.C.
DRAWING ALTERATION

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS ACTING UNDER THE DIRECTION OF A LICENSED ARCHITECT, ENGINEER OR LAND SURVEYOR, TO ALTER AN ITEM IN ANY WAY. IF AN ITEM BEARING THIS ALTERS THE DOCUMENT IS REVISED BY, FOLLOWED BY HIS SIGNATURE AND THE DATE OF SUCH ALTERATION, AND A SPECIFIC DESCRIPTION OF THE ALTERATION.

	DATE	BY
7		
6		
5		
4		
3		
2		
1	REVISIONS	

DAY ENGINEERING, P.C.
ENVIRONMENTAL ENGINEERING CONSULTANTS
ROCHESTER, NEW YORK 14623-2760

PROJECT TITLE
METRO-NORTH RAILROAD
NORTH WHITE PLAINS YARD
NORTH WHITE PLAINS, NEW YORK
STORMWATER POLLUTION PREVENTION PLAN

DRAWING TITLE
Site Plan

PROJECT NO.
99-2884I (30)

DRAWING NO.
FIGURE 1

SHEET 1 OF 1

APPENDIX 1

POLLUTION PREVENTION TEAM

POLLUTION PREVENTION TEAM
MEMBER ROSTER

Leader: Nelson Rodrigues M of E **Title:** Facility Supervisor

Office Phone: 914-686-8706

Responsibilities: M of E : Signatory authority; coordinate each stage of plan development and implementation; Coordinate employee training program; recordkeeping; report submittals; inspections; housekeeping.

Members:

(1) Al Young, Foreman, Material Coordinator (8-4 shift) **Office Phone:** 914-686-8705

Ray Calore, General Foreman (4-12 shift) **Office Phone:** 914-686-8705

Chris Singh, Foreman (12-8 shift) **Office Phone:** 914-686-8704

(2) Jay Adessa, Foreman Freight Shop **Office Phone:** 914-686-8660

(3) Will Clark, Foreman Freight Shop **Office Phone:** 914-686-8661

Responsibilities: Team Members

Leader: Lova Borisjuk M of W **Title:** Facility Supervisor

Office Phone: 914-686-8467

Responsibilities: M of W : Signatory authority; coordinate each stage of plan development and implementation; Coordinate employee training program; recordkeeping; report submittals; inspections; housekeeping.

Members:

(1) Stanley Dabrowski, Supervisor, Work Equipment **Office Phone:** 914-686-8465

(2) Ken Perrotti, Shop Foreman **Office Phone:** 914-686-8470

(3) Frank Pellegrino, Parts Forman **Office Phone:** 914-686-8471

Responsibilities: Team Members

Leader: Anthony Forcina, C&S **Title:** Facility Supervisor

Office Phone: 914-686-8520

Responsibilities: C & S : Signatory authority; coordinate each stage of plan development and implementation; Coordinate employee training program; recordkeeping; report submittals; inspections; housekeeping.

Members:

) Dereck Hill, Supervisor, Work Equipment **Office Phone:** 914-686-8519

APPENDIX 2

DESCRIPTION OF MATERIAL INVENTORY

Material Inventory

Instructions: List all materials used, stored, or produced on-site. Assess and evaluate these materials for their potential to contribute pollutants to storm water runoff.

Material	Purpose/Location	Quantity (units)			Quantity Exposed in Last 3 Years	Likelihood of contact with storm water. If high, describe reason.	Past Significant Spill or Leak	
		Used	Produced	Stored			Yes	No
Various paints	Train painting	1 gal/mth	-	448 gals*	None	Low		X
Various non-halogenated solvents	Paint thinning and degreasing	1 ½ gal/mth	-	224 gals*	None	Low		X
Paint Stripper	Liquid acid used to wash cars in paint shop	220 gal/mth	-	220gals*	None	Low		X
Propylene Glycol	Anti-freeze for train toilets	37 gal/mth	-	440 gals	None	Medium; Drum are stored outside and are not protected		X
Ethyl Alcohol	Cleaning Trains in Shop	55 gal/mth		220 gals	None	Medium; Drum are stored outside and are not protected		X
Various lubricating oils/greases	Train maintenance	195 gal/mth	-	255 gals*	None	Low		X
Various metal parts/scrap	Train maintenance	-	-	2,000 lbs	Est. 2000 lbs	High; Product/scrap is stored outside.		X
Various cleaning solutions	Train parts/facility cleaning	110 gal/mth	-	660 gals	None	Medium; Drum are stored outside and are not protected		X
Empty drums which contained various oils or chemicals	Train/facility maintenance	-	-	20 drums	Est. 20 drums	High; Empty drums are stored outside.		X
Various electrical supplies/cables	Train maintenance	-	-	10 bales	Est. 10 bales of electrical cable.	High; Electrical supplies are stored outside.		X
Diesel fuel	Train/vehicle fuel	-	-	5,000 gal	None	Medium: Loading / Unloading spills		X

Material Inventory

Instructions: List all materials used, stored, or produced on-site. Assess and evaluate these materials for their potential to contribute pollutants to storm water runoff.

Material	Purpose/Location	Quantity (units)			Quantity Exposed in Last 3 Years	Likelihood of contact with storm water. If high, describe reason.	Past Significant Spill or Leak	
		Used	Produced	Stored			Yes	No
Open-top dumpsters	Storage of waste materials	-	-	90 cyds	3 dumpsters at 30 cyds each	High; Open-top dumpsters are stored outside.		X
Batteries	Train maintenance	-	-	*	None	Low		X
Flammable Gases	Equipment maintenance & operation	-	-	4 cylinders	None	Very Low		X
Non- Flammable Gases	Equipment maintenance & operation	-	-	6 cylinders	None	Very Low		X
Various bulk oils	Equipment maintenance & operation	-	-	6,000 gal*	None	Low : oils stored indoors within containment		X
Gasoline & Diesel Automotive Fueling	Vehicle Fueling	-	-	8,000 gal	None	Low : tanks underground and installed in accordance with applicable regulations		X
Fuel Oil Storage	Building heat & equipment fueling	-	-	30,000 gal	Occasional small spills during fueling operations located outdoors	High : equipment fueling occurs outdoors and minor spillage occurs; the tanks area underground and installed in accordance with applicable regulations		X

* These materials are stored inside and are not exposed to stormwater

APPENDIX 3

SITE VISIT AND IDENTIFICATION OF EXPOSED SIGNIFICANT MATERIALS

Metro-North Railroad North White Plains

Site Assessment Inspection

January 12, 1994

There are four significant items/materials which appear to be exposed to storm water. Refer to Figure 1 for the locations where these items/materials are stored.

- Various metal train parts, steel scrap, and other debris were observed outside along the south-western property line, and along the embankment leading to the Bronx River.

- Empty drums, and electrical wiring bales were observed stored outside between the Maintenance-of-Way (M/W) shop and the Materials-and-Equipment (M/E) shop.

- Electrical wiring bales and other metal parts were observed stored outside along the south side of the M/W shop.

- Three open-top waste dumpsters are located on the property. These dumpsters are designated by NWP personnel to contain municipal refuse only.

Metro-North Railroad North White Plains

Site Assessment Inspection

January 30, 2001

There are four significant items/materials that appear to be exposed to storm water. Refer to Figure 1 for the locations where these items/materials are stored.

- Various metal train parts, steel scrap, and other debris were observed outside along the southwestern property line, along the embankment leading to the Bronx River, along the eastern property line, and north of the C&S Building.

- Empty drums, and electrical wiring bales were observed stored outside between the Maintenance-of-Way (M/W) shop and the Materials-and-Equipment (M/E) shop. Empty drums were also observed on the western side of the M/W Shop and on the eastern portion of the property south of the auto fueling station.

- Electrical wiring bales and other metal parts were observed stored outside along the south side of the M/W shop, along the southwestern property line, along the northeastern property line, and east of the M/E Shop.

- Three 30 yd^3 open-top waste dumpsters are located on the property. These dumpsters are designated by NWP personnel to contain municipal refuse only. One estimated 20 yd^3 open-top dumpster is located on the property and is designated to contain metal scrap material. Six 3 yd^3 open-top waste dumpsters were observed on the property and were designated to contain municipal refuse only.

- Eight drums of various oils or chemicals were observed south of the M/W Shop, south of the auto fueling station, and east of the M/W Shop.

Description of Exposed Significant Material

Instructions: Based on your material inventory, describe the significant materials that were exposed to storm water during the past three years and/or are currently exposed.

Material	Purpose/Location	Quantity (units)			Quantity Exposed in Last 3 Years	Likelihood of contact with storm water. If yes, describe reason.	Past Significant Spill or Leak	
		Used	Produced	Stored			Yes	No
Metal parts, scrap, and debris	Train maintenance/ south western end of yard	-	-	2,000 lbs	Est. 2000 lbs.	High - product/scrap/debris is stored outside.		X
Empty drums which contained various oils or chemicals	Train & facility maintenance/between M/W & M/E shop	-	-	20 drums	Est. 20 drums	High – empty drums are stored outside.		X
Various electrical supplies and cables	Train maintenance/south of M/W shop, and between M/W & M/E shop.	-	-	10 bales	Est. 10 bales of electrical cable	High – electrical supplies are stored outside.		X
Open-top dumpsters	Storage of waste materials	-	-	100 cyds	Est. 3 dumpsters @ 300 ft^2 each = 900 ft^2.	High – open top dumpsters are stored outside.		X
Propylene Glycol	Anti – freeze used for train toilets	37 gal/month	-	440 gals.	8 – 55 gallon drums stored outside	Medium- drums are unprotected from vehicles		X
Ethyl Alcohol	Cleaning Trains in Shop	55 gal/month	-	220 gals.	4 – 55 gallon drums stored outside	Medium- drums are unprotected from vehicles		X
Various Cleaning Solutions	Train parts/facility cleaning	110 gal/month	-	660 gals.	12 – 55 gallon drums stored outside	Medium- drums are unprotected from vehicles		X
Fuel Oil Storage	Heat & Equipment fueling	-	-	30,000 gals.	Occasional small spills during fueling operations located outdoors	High : equipment fueling occurs outdoors and minor spillage occurs; the tanks area underground and installed in accordance with applicable regulations		X

APPENDIX 4

POLLUTANT SOURCE IDENTIFICATION AND BEST MANAGEMENT PRACTICES (BMPs)

Pollutant Source Identification

Instructions: List the identified storm water pollutant sources and describe existing management practices that address those sources. In the third column, list BMP options that have been incorporated into the plan to address remaining sources of pollutants.

Storm Water Pollutant Sources	Existing Management Practices	Description of New BMP Options
1. Metal parts, scrap, and debris	None	Store materials in covered containers or sheds
2. Empty drums which contained various oils or chemicals	None	Good housekeeping, visual inspections
3. Various electrical supplies and cables	None	Store materials in covered containers or sheds
4. Open-top dumpsters	None	Cover dumpsters with hinged tops, visual inspections
5. Outside storage of chemicals	Visually inspected on a regular basis	Construct a covered containment area to protect drums

BMP Identification - Metal Parts, Scrap, and Debris

Instructions: Describe the Best Management Practices that have been selected to include in the SWPP plan. For each of the baseline BMPs, describe actions that will be incorporated into facility operations.

BMP's	Brief Description of Activities
Store materials in covered containers or sheds	Avoid contaminating storm water by preventing storm water run-on or rain from coming into contact with the materials. This can be accomplished by storing the materials in covered containers or sheds, or storing the materials indoors; if feasible.

BMP Identification - Empty Drums Which Contained Various Oils or Chemicals

Instructions: Describe the Best Management Practices that have been selected to include in the SWPP plan. For each of the baseline BMPs, describe actions that will be incorporated into facility operations.

BMP's	Brief Description of Activities
Visual inspections	Conduct monthly visual inspections of the drum storage area will alert facility operators to open-top, or dirty/stained drums.
Good housekeeping	Store drums inside if possible. If outside storage is required, make sure drums are empty and exteriors of drums are clean and free of oil or chemical contamination. Store drums with the lid on, and on their side or upside down.

BMP Identification - Various Electrical Supplies and Cables

Instructions: Describe the Best Management Practices that have been selected to include in the SWPP plan. For each of the baseline BMPs, describe actions that will be incorporated into facility operations.

BMP's	Brief Description of Activities
Store materials in covered containers or sheds	Avoid contaminating storm water by preventing storm water run-on or rain from coming into contact with the materials. This can be accomplished by storing the materials in covered containers or sheds, or storing the materials indoors; if feasible.

BMP Identification - Open-Top Dumpsters

Instructions: Describe the Best Management Practices that have been selected to include in the SWPP plan. For each of the baseline BMPs, describe actions that will be incorporated into facility operations.

BMP's	Brief Description of Activities
Visual Inspections	Monthly visual inspections of the dumpster covers and dumpster contents will help identify open covers and any improper disposal of materials unsuitable for dumpsters (e.g., oil filters, oily rags, oil spill clean-up debris, etc.).
Cover dumpsters with hinged tops	To avoid contaminating storm water, the dumpster should be equipped with hinged tops. This will assist in preventing rainwater from coming into contact with the wastes in the dumpsters, picking-up contaminants, and then leaking out of the drain holes in the bottom.

BMP Identification – Outdoor Storage of Chemicals

Instructions: Describe the Best Management Practices that have been selected to include in the SWPP plan. For each of the baseline BMPs, describe actions that will be incorporated into facility operations.

BMP's	Brief Description of Activities
Visual Inspections	Daily visual inspections of the chemical drums that are stored outdoors to verify that the containers are in good condition and clean (i.e., no chemical residues on the top or sides).
Construct a covered containment area for the chemicals that are stored outdoors	Avoid contaminating storm water by preventing storm water run-on or rain from coming into contact with the chemical drums. This can be accomplished by storing the chemical drums in a covered containment area outdoors, or by storing them indoors; if feasible.

APPENDIX 5

SCHEDULE FOR IMPLEMENTATION OF BMPs

Implementation - Metal Parts, Scrap, and Debris

Instructions: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e. any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.

BMP's	Description of Actions(s) Required for Implementation	Scheduled Completion Date(s) for Reqd. Action	Person Responsible for Action	Notes
Store materials in covered containers or sheds	1. Procure covered containers or sheds	6-01	K. McHale	
	2. Move materials into covered containers/sheds	8-01	K. McHale	
	3. Assign personnel to maintain containers/sheds	8-01	K. McHale	

Implementation - Empty Drums Which Contained Various Oils or Chemicals

Instructions: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e. any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.

BMP's	Description of Actions(s) Required for Implementation	Scheduled Completion Date(s) for Reqd. Action	Person Responsible for Action	Notes
Good housekeeping	1. Assign personnel to ensure drums are empty, externally clean, and stored on their side or upside down	6- 01	J. Wright	
	2. Assign personnel to perform routine inspections of the drum storage area	6- 01	J. Wright	

Implementation - Various Electrical Supplies and Cables

Instructions: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e. any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.

BMP's	Description of Actions(s) Required for Implementation	Scheduled Completion Date(s) for Reqd. Action	Person Responsible for Action	Notes
Store materials in covered containers or sheds	1. Procure covered containers or sheds	6-01	S. Dabrowski	
	2. Move materials into covered containers/sheds	8-01	S. Dabrowski	
	3. Assign personnel to maintain containers/sheds	8-01	S. Dabrowski	

Implementation - Open-Top Dumpsters

Instructions: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e. any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.

BMP's	Description of Actions(s) Required for Implementation	Scheduled Completion Date(s) for Reqd. Action	Person Responsible for Action	Notes
Cover dumpsters with hinged tops	1. Procure hinged dumpster covers	6-01	K. McHale	
	2. Assign personnel to install dumpster covers	8-01	K. McHale	
Visual Inspections	1. Assign personnel to routinely inspect dumpster covers and dumpster contents	8-01	K. McHale	

Implementation – Outdoor Storage of Chemicals

Instructions: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e. any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.

BMP's	Description of Actions(s) Required for Implementation	Scheduled Completion Date(s) for Reqd. Action	Person Responsible for Action	Notes
Store chemical drums in covered containment areas or move indoors	1. Procure / construct covered containment area	8-01	K. McHale	
	2. Move chemical drums into containment area	8-01	K. McHale	
	3. Assign personnel to maintain the containment area	8-01	K. McHale	

APPENDIX 6

EMPLOYEE TRAINING PROGRAM

Metro-North - North White Plains Yard
Employee Training Program

Who:

- Employees involved with the operation and maintenance of the above ground tank system, empty drum storage areas, fueling of trains, boiler system, and the ground water recovery stations

When:

Employee meetings held annually to discuss:

- Any environmental/health and safety incidents that occurred during the previous year
- Upcoming training sessions
- Brief reminders on good housekeeping, spill prevention and response procedures, and material handling practices
- Announce any changes to the plan
- Announce any new management practices

In-depth pollution prevention training for new employees, and refresher courses held annually addressing:

- **Inspections**
  - Familiarize employees with areas to be inspected
  - Introduce inspection checklist
  - Discuss recordkeeping of inspections
  - Discuss scheduling of inspections
- **Good Housekeeping**
  - Review and demonstrate basic drum storage and clean-up techniques; proper fuel pad/pump shed maintenance; and proper maintenance of the industrial waste secondary containment area.
  - Post signs at fueling pad area reminding personnel to not "top-off" the trains.
  - Discuss scheduling of housekeeping activities.

- **Preventive Maintenance**

  - Familiarize employees with areas to be maintained
  - Introduce maintenance checklist
  - Discuss recordkeeping of maintenance
  - Discuss scheduling of maintenance

- **Spill Prevention and Response**

  - Identify potential spill areas and drainage routes
  - Familiarize employees with past spill events (re: why they happened and the environmental impact)
  - Post warning signs in spill areas with emergency contacts and telephone numbers
  - Introduce the Spill Response Coordinator and introduce his "team"
  - Post the locations of spill clean-up equipment and the persons responsible for operating the equipment

- **Materials Handling and Storage**

  - Identify hazardous materials and their locations
  - Review information on container labels
  - Tell employees to use oldest materials first
  - Explain recycling practices
  - Demonstrate how valves are tightly closed and how drums should be sealed
  - Show how to fuel vehicles and to avoid "topping off"

Employee Training

Instructions: Describe the employee training program for the facility. The program should good housekeeping, and material management practices. Provide a schedule for the training program and list the employees who attend training sessions.

Training Topics	Brief Description of Training Program/Materials (e.g. film, newsletter course)	Schedule for Training (list dates)	Attendees
Good housekeeping	Handouts, rosters and schedules	April – 01 To be done Annually with SWPP Training	Materials processing and waste disposal employees, empty drum maintenance crew
Material management practices	Handouts, rosters	April – 01 To be done Annually with SWPP Training	Materials processing and waste disposal employees, empty drum maintenance crew

APPENDIX 7

CERTIFICATIONS

Non-Storm Water Discharge Assessment and Certification

Date of Test or Evaluation	Outfall Directly Observed During the Test (identify as indicated on the site map)	Method Used to Test or Evaluate Discharge	Describe Results from Test for the Presence of Non-Storm Water Discharge	Identify Potential Significant Sources	Name of Person Who Conducted the Test or Evaluation
1-12-94	Outfall 001	Visual inspection	No non-storm water discharges were observed.	No potential significant sources	Ken McHale
1-12-94	Outfall 002	Visual inspection	No non-storm water discharges were observed.	No potential significant sources	Ken McHale

Certification

I, Nelson Rodrigues & Lova Borisjuk (responsible corporate officials), certify under penalty of law that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of *fine and imprisonment for knowing violations.*

A. Name & Official Title (type or print) Nelson Rodrigues, M of E, Facility Supervisor	B. Area Code and Telephone No. 914-686-8706
C. Signature	D. Date Signed 05/18/01
A. Name & Official Title (type or print) Lova Borisjuk, M of W, Facility Supervisor	B. Area Code and Telephone No. 914-686-8467
C. Signature	D. Date Signed 5/8/01
A. Name & Official Title (type or print) Anthony Forcina, C & S, Facility Supervisor	B. Area Code and Telephone No. 914-686-8520
C. Signature	D. Date Signed 5/15/01

APPENDIX D

TANK MANAGEMENT PLAN

TANK MANAGEMENT PLAN MANUAL

DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES

NORTH WHITE PLAINS

METRO-NORTH RAILROAD

Revised December 2000

Day Engineering, P.C.
2144 Brighton-Henrietta Town Line Road
Rochester, New York 14623

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NYSDEC & USEPA REQUIREMENTS

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NYSDEC TOGS 4.1.4 (INVENTORY CONTROL)

NYSDEC TOGS 4.1.2 (TIGHTNESS TESTING)

NYSDEC SPOTS MEMO #2 (TIGHTNESS TESTING)

NYSDEC GUIDANCE PAPER (STANDPIPE TESTING)

40 CFR PART 112 (SPCC PLAN)

ARTICLE XXV OF THE WESTCHESTER COUNTY SANITARY CODE

TANK MANAGEMENT PLAN OVERVIEW

THIS DOCUMENT IS THE METRO-NORTH RAILROAD ENVIRONMENTAL COMPLIANCE AND SERVICES DEPARTMENT's TANK MANAGEMENT PLAN MANUAL. THIS MANUAL IS INCLUSIVE OF THE FOLLOWING FACILITY:

NORTH WHITE PLAINS YARD

THE PURPOSE OF THIS MANUAL IS TO SERVE AS AN UP-TO-DATE RECORD OF TANK DATA AND AS A GUIDE TO THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE & SERVICE FOR EFFECTING THEIR RESPONSIBILITIES AND ASSISTING THE RESPONSIBLE PARTIES. THIS MANUAL INCLUDES:

- *Text of the Tank Management Plans*
- *Record of the Tank Data Sheets*
- *Informational text which identifies applicable regulatory precepts and supporting guidance*
- *Copies of applicable regulations and supporting guidance documents*
    - *Summary of NYSDEC and USEPA Requirements*
    - *6 NYCRR Parts 612 through 614 (PBS)*
    - *40 CFR Part 280 (UST)*
    - *NYSDEC TOGS 4.1.4 (Inventory Control)*
    - *NYSDEC TOGS 4.1.2 (Tightness Testing)*
    - *NYSDEC TOGS Memo #2 (Tightness Testing)*
    - *NYSDEC Guidance Paper (Standpipe Testing)*
    - *40 CFR Part 112 (SPCC Plan)*

THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES IS RESPONSIBLE FOR PERFORMING THE FOLLOWING FUNCTIONS RELATING TO THE TANK MANAGEMENT PLAN

- *Registration of*
    - *new facilities*
    - *renewal (every 5 years)*
- *NYSDEC notification of*
    - *transfer of ownership*
    - *substantially modified facilities*
    - *permanent facility closure*
    - *spill/leak/discharge*
    - *testing failure*
    - *inspection failure*
    - *non-reconciliation of inventory monitoring*
- *Arranging for*
    - *precision tightness testing*
    - *standpipe testing*
    - *cathodic protection system testing*
    - *vacuum, pressure and electronic leak detection system testing/inspection*
    - *ten (10)-year aboveground tank inspection*

VOLUME I
USER's MANUAL

TANK MANAGEMENT PLAN

A. DESCRIPTION OF THE TANK MANAGEMENT PLAN

The Tank Management Plan (TMP) identifies procedures for, and documents the handling and management of petroleum storage tank (tank) facilities at North White Plains Yard.

The purpose of the TMP is:

- To minimize the possibility of the spilling and/or leaking of product from tank systems.
- To identify standard operation procedures (SOP) for, and to maintain records which document, the ongoing management of tank systems to keep the facility in compliance with regulations.

The TMP consists of three volumes:

- Volume I, USER's MANUAL, presents an overview of the TMP and its use.
- Volume II, REQUIREMENTS AND PROCEDURES, identifies specific management requirements and standard operating procedures for the product handling and storage responsibilities.
- Volume III, DOCUMENTATION, serves as a record of required documentation, including a copy of the facility Registration, and where applicable, the SPCC plan.

The copy of Volume III documentation is maintained at each registered facility.

B. REGULATORY AUTHORITY

Both State and federal laws apply to the management of tank systems at these facilities. New York State regulates both aboveground and underground tanks and piping under Petroleum Bulk Storage Regulations, 6 NYCRR Parts 612 through 614 (PBS). Federal requirements for Underground Storage Tanks (UST) and appurtenances are provided under regulations at 40 CFR Part 280. In addition, these facilities may be regulated under 40 CFR Part 112 requiring a Spill Prevention Control and Countermeasure (SPCC) Plan.

C. TANKS

Tanks currently in use are registered as to the following Facilities:

- **North White Plains Yard**

At Appendix A of Volume II are Tank Data Sheets (TDS's) and a Site Plan which identify the tanks and locations for the respective Facilities.

D. RESPONSIBILITY FOR TANK MANAGEMENT PLAN IMPLEMENTATION

Responsibility for the implementation of the TMP is shared by both the Metro-North Railroad Department of Environmental Compliance and Services and the on-site Responsible-Party (RP).

The regulated components of tank management include:

- Facility registration
- Facility construction and modification
- Product handling and storage

The Department of Environmental Compliance and Services is responsible for implementing and maintaining compliance with facility registration and facility construction and modification requirements.

The RP is responsible for maintaining compliance with product handling and storage requirements, with support from the Department of Environmental Compliance and Services. This support includes regulatory interfacing, technical assistance, outside contractor administration and TMP quality control and quality assurance.

The RP for each of the registered facilities are those individuals/positions identified in Volume III.

F. FACILITY REGISTRATION

The requirement that tanks be registered with a regulatory agency, and which agency, is dependent upon criteria which includes the type of product stored, size of tanks, whether aboveground or underground, product use, tank location, etc.

The Department of Environmental Compliance and Services is responsible for determining whether a tank requires registration and for submitting the application for registration. PBS registration is renewable every 5 years (the date of renewal is identified on the Tank Data Sheet (TDS) for each tank and on the facility Registration form), and/or if there is substantial modification to a facility. Also, a copy of the facility Registration is required to be maintained at the facility in Volume III.

The RP is to assist the Department of Environmental Compliance and Services by maintaining a copy of the facility Registration at the facility in Volume III of the TMP, and notifying the Department of Environmental Compliance and Services if the facility Registration is not current or if there are modifications made at the facility.

F. FACILITY CONSTRUCTION AND MODIFICATION

Regulations require that new or substantially modified tank systems be constructed in accordance with defined standards. The Department of Environmental Compliance and Services is responsible for overseeing that all-new or substantially modified tank systems meet regulatory construction requirements.

The RP is to assist the Department of Environmental Compliance and Services by notifying the Department of Environmental Compliance and Services if there are modifications made to tank systems that are not identified in the TDS, and by maintaining a record of modifications at the facility in Volume III of the TMP.

G. PRODUCT HANDLING AND STORAGE

Again, the RP is responsible for maintaining compliance with product handling and storage requirements. The major elements of the product handling and storage responsibilities include:

- Spill/Leak/Discharge Response
- Maintenance of Spill Prevention Equipment
- Oversight of Transfer Operations
- Color Coding/Symbol Marking of Fill Ports
- Inventory Monitoring
- Tank and Piping Tightness Testing
- Tank Standpipe Testing

- Cathodic Protection System Testing
- Leak Detection System Monitoring and Inspection/Testing
- Monthly Inspection of Aboveground Facilities
- Ten (10) Year Inspection of Aboveground Tanks
- Inspection of Secondary Containment System Prior to the Discharge of Retained Water
- Reportable Events/Conditions
- Maintenance of Documentation

Volume II presents an overview description of the product handling and storage requirements and identifies the activities and actions to be performed. The specific requirements for each tank are identified on the TDS for that tank at Appendix A of Volume II. Appendix B of Volume II identifies the standard operating procedures for implementing these requirements.

The activities and actions performed must be documented, and a record of this documentation must be maintained at the facility. Volume III serves as the record of this documentation.

VOLUME II
REQUIREMENTS AND PROCEDURES
(Product Handling and Storage)

TANK MANAGEMENT PLAN

The Responsible-Party (RP) is responsible for implementing the product handling and storage requirements of the Tank Management Plan (TMP). At Appendix A is a Site Plan which identifies the tanks and locations for each facility, and Tank Data Sheets (TDS's) which identify the product handling and storage requirement applicable to each tank. At Appendix B are Standard Operating Procedures (SOPs) which describe the tasks to be performed.

An overview of the product handling and storage requirements is as follows:

A. SPILL/LEAK/DISCHARGE RESPONSE

It is the responsibility of the RP to respond to a spill/leak/discharge of product from a tank system. Spill/Leak/Discharge Response procedures are described in SOP-1. For documentation purposes, a Reportable Event/Condition Report form (F-3) must be filled out and filed at Appendix M in Volume III for each spill/leak/discharge that occurs.

B. MAINTENANCE OF SPILL PREVENTION EQUIPMENT

The RP is responsible for keeping all gauges, valves and other equipment for spill prevention in good working order.

C. OVERSIGHT OF TRANSFER OPERATIONS

The RP or Metro-North personnel, when on the premises or when in control of a petroleum transfer, are responsible for transfer activities. If the RP or Metro-North personnel are not on the premises or not in control of a petroleum transfer, the carrier is to be responsible for transfer activities. All personnel shall employ practices for preventing transfer spills and accidental discharges and shall monitor every aspect of the delivery.

The RP is responsible for overseeing the transfer operation and maintaining a record of the transfer operation. Oversight of Transfer Operations procedures are described in SOP-2. For documentation purposes, transfer operation must be logged at Appendix C in Volume III.

D. COLOR CODING/SYMBOL MARKING OF FILL PORTS

All tank system fill ports must be color coded and marked with a symbol to identify the product inside the tank. If a fill port is not marked or is mismarked, or if the coloring or the symbol is unclear, the RP is responsible for notifying the Department of Environmental Compliance and Services. The fill port colors and symbol markings are as follows:

PRODUCT	COLOR/SYMBOL
High Grade gasoline	Red/Circle
Middle Grade Gasoline	Blue/Circle
Lower Grade Gasoline	White/Circle
High Grade Unleaded Gasoline	Red w/ White Cross/Circle
Middle Grade Unleaded Gasoline	Blue w/ White Cross/Circle
Lower Grade Unleaded Gasoline	White w/ Black Cross/Circle
Vapor Recovery System	Orange/Circle
Diesel	Yellow/Hexagon
#1 Fuel Oil	Purple w/ Yellow Bar/Hexagon
#2 Fuel Oil	Green/Hexagon
Kerosene	Brown/Hexagon
Extenders	(Border) White w/ Black Around White

E. INVENTORY MONITORING

Daily inventory monitoring must be performed on certain underground tank systems for the purpose of detecting leaks. In lieu of inventory monitoring, annual standpipe or tightness testing may be used for certain tank systems.

Inventory monitoring records must be kept for each tank and include measurements of bottom water levels, use, deliveries, inventory on hand and losses or gains. Water level measurements must be reconciled on a daily basis to determine whether an increase in water level has occurred. Tank inputs, withdrawals, and measured product must be reconciled every ten (10) days to determine whether an abnormal loss or gain of product has occurred. Reconciliation of records must be kept current. Equipment used must be able to measure product level over a full range of the tank's height to the nearest one-eighth of an inch, and meter and record dispensed product with an accuracy of 6 cubic inches for every 5 gallons of product withdrawn.

The RP is responsible for performing the inventory monitoring and maintaining inventory records. Inventory Monitoring procedures are described in SOP-3. The included Inventory Monitoring Worksheet Record form (F-1) must be filled out daily, reconciled when complete, and filed at Appendix D in Volume III.

F. TIGHTNESS TESTING

Annual, 3-year or 5-year tank tightness testing must be performed on certain tank systems. Tightness testing can be required for both the tank and piping. The tightness testing must be performed by a qualified outside contractor. It is the responsibility of the Department of Environmental Compliance and Services to arrange for tightness testing.

The method of testing must be acceptable to the New York State Department of Environmental Conservation (NYSDEC) and be capable of detecting a tank or piping leak as small as five-hundredths (0.05) of a gallon in one (1) hour, accounting for variables such as vapor pockets, thermal expansion of product, temperature stratification, groundwater level, evaporation, pressure, and end deflection. The outside contractor must prepare a tightness testing report.

The RP is responsible for notifying the Department of Environmental Compliance and Services when tightness testing is required and to maintain a record of the tightness testing report. Tightness Testing procedures are described in SOP-4. For documentation purposes, a copy of the tightness testing report must be filed at Appendix E in Volume III.

G. STANDPIPE TESTING

Annual standpipe testing may be used as an alternative to inventory monitoring on certain underground tanks. The testing may be performed by qualified Metro-North Railroad personnel or by a qualified outside contractor. It is the responsibility of the Department of Environmental Compliance and Services to arrange for standpipe testing.

A standpipe testing report must be prepared to document the testing.

The RP is responsible for notifying the Department of Environmental Compliance and Services when standpipe testing is required and to maintain a record of the standpipe testing report. Standpipe Testing procedures are described in SOP-5. For documentation purposes, a copy of the standpipe testing report must be filed at Appendix F in Volume III.

NOTE: Standpipe testing is not an acceptable alternative to tightness testing.

H. CATHODIC PROTECTION SYSTEM TESTING

The adequacy of a cathodic protection system must be tested at least annually. The testing must be performed by a qualified outside contractor. It is the responsibility of the Department of Environmental Compliance and Services to arrange for annual cathodic protection system testing.

A report must be prepared to document the testing.

The RP is responsible for notifying the Department of Environmental Compliance and Services when testing is required and to maintain a record of the testing report. Monitoring of Cathodic Protection System procedures are described in SOP-6. For documentation purposes, the testing report must be filed at Appendix G in Volume III.

I. LEAK DETECTION SYSTEM MONITORING AND INSPECTION/TESTING

Leak detection systems consist of one or more of the following:

- Electronic in-tank monitoring systems capable of detecting a leak of 0.2 gallons/hour
- Electronic, pressure, vacuum, or manual interstitial monitoring systems designed to detect a breach of the inner wall or outer wall of double-walled tanks
- Vapor and/or groundwater observation wells installed either within the secondary containment chamber of the tank system, or within the backfill surrounding the tank

Leak detection systems must be monitored for leak alarms, changes in pressure, and/or traces of liquid or vapor product at least once per week. Leak detection systems must be inspected/tested for proper working order on a monthly basis. A qualified electrical technician must perform the inspections/testing of electronic monitoring systems. It is the responsibility of the Department of Environmental Compliance and Services to arrange for the inspection/testing of vacuum, pressure and electronic leak detection systems.

The RP is responsible for performing the leak detection system monitoring, performing the leak detection system inspection/testing (unless performed by others) and maintaining a record of the monitoring and inspection/testing. Leak Detection System Monitoring procedures are described in SOP-7. Leak Detection System Inspection/Testing procedures are described in SOP-8. For documentation purposes, the performance of the leak detection monitoring must be logged at Appendix H in Volume III and the leak detection inspection/testing logged at Appendix I in Volume III.

J. MONTHLY INSPECTION OF ABOVEGROUND FACILITIES

All aboveground tank systems and aboveground equipment must be inspected on a monthly basis. The monthly inspection should include inspection of the exterior surfaces of tanks and piping systems, secondary containment structures, transfer facilities, and other equipment for leaks, identification of cracks, areas of wear, corrosion and thinning, maintenance and operating deficiencies, settlement, equipment malfunction and structural weakness.

The RP is responsible for performing the monthly inspections and preparing and maintaining a report of the inspection. Monthly Inspection of Aboveground Facilities procedures are described in SOP-9. For documentation purposes, the included Monthly Inspection Record form (F-2) must be filled out for each inspection and filed at Appendix J in Volume III.

K. TEN (10)-YEAR INSPECTION OF ABOVEGROUND TANKS

In addition to the monthly inspections, certain aboveground tanks require a detailed inspection every ten (10) years. The ten (10)-year inspection will be performed by a qualified outside contractor. It is the responsibility of the Department of Environmental Compliance and Services to arrange for ten (10)-year inspections of aboveground tanks.

The outside contractor will prepare an inspection report.

The RP is responsible for notifying the Department of Environmental Compliance and Services when the ten (10)-year inspections is required and to maintain a record of the ten (10)-year inspection report. Ten (10)-Year Inspection of Aboveground Tanks procedures are described in SOP-10. For documentation purposes, the inspection report must be filed at Appendix K in Volume III.

L. INSPECTION OF SECONDARY CONTAINMENT SYSTEM PRIOR TO THE DISCHARGE OF RETAINED WATER

Precipitation that collects in the secondary containment systems must periodically be discharged in order to maintain adequate containment capacity for spills/leaks. Where these discharges are not tributary to a treatment system the contents of the secondary containment system must be inspected to ensure that no petroleum product or sheen is present prior to allowing discharge from the secondary containment system.

The RP is responsible for performing the inspection the secondary containment prior to allowing discharge and to log the inspection/discharge. Inspection of Secondary Containment System Prior to the Discharge of Retained Water procedures are described in SOP-11. For documentation purposes, the inspection/discharge must be logged at Appendix L in Volume III.

M. REPORTABLE EVENTS/CONDITIONS

Certain events/conditions are required to be reported the NYSDEC. The standard operating procedure is that when the RP or other Metro-North personnel become aware of a reportable event/conditions, they shall immediately report this event/condition to the Department of Environmental Compliance and Services. The Department of Environmental Compliance and Services shall be responsible for reporting the event/condition to the NYSDEC. Reportable Events/Conditions procedures are described in SOP-12. For documentation purposes, the included Reportable Event/Condition Record form (F-3) must be filled out for each reportable event/condition and filed at Appendix M in Volume III.

N. MAINTENANCE OF DOCUMENTATION

The RP is responsible for maintaining product handling and storage documentation. This documentation shall be included in the appropriate appendix as a part of Volume III (DOCUMENTATION) of the TMP. A summary of the required documentation is listed below.

REQUIREMENT	FORM OF DOCUMENTATION
Facility (Tank) Registration	Registration Form
SPCC Plan	Written Plan
Oversight of Product Transfer	Log
Inventory Monitoring	Form F-1
Tightness Testing	Contractor's Report
Standpipe Testing	Contractor's Report
Cathodic Protection System Testing	Contractor's Report
Leak Detection System Monitoring	Log
Leak Detection System Inspection/Testing	Log
Monthly Inspection	Form F-2
Ten (10)-Year Inspection	Contractor's Report
Inspection of Secondary Containment Prior to the Discharge of Retained Water	Log
Reportable Event/Condition	Form F-3

APPENDIX A

TANK DATA SHEETS

TANK DATA SHEET
NORTH WHITE PLAINS YARD

TANK SYSTEM

Tank #: **13K**	Product: **#2 Fuel Oil**	Date of Installation: **10/90**
Location: **Yard Office**	Type: **Underground**	Label (Working Capacity): **500 Gallons**
Capacity: **550 Gallons**	Dispensing Method: **Suction Pump**	Color Code/Symbol: **Green/Hexagon**

TANK/PIPE CONSTRUCTION

Tank Material: **Fiberglass**	Tank Leak Detection: **Interstitial Monitoring**	Pipe Corrosion Protection: **None**
Tank Secondary Containment: **Double Walled**	Pipe Type: **Underground**	Pipe Leak Detection: **Interstitial Monitoring**
Secondary Containment Size: **NA**	Pipe Material: **Copper**	Gauge/Meter/Alarm: **Gauge/Alarm**
Tank Corrosion Protection: **Fiberglass**	Pipe Secondary Containment: **Plastic Hose**	Spill/Overflow Protection: **Gauge/Alarm**

REGISTRATION

Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
7	**Leak Detection System Monitoring**	**Weekly**
8	**Leak Detection System Inspection/Testing**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

- *Tightness Tested, U.S. Tank Tech., 3/14/00 - Piping Failed*
- *Taken Out of Service 3/14/00 for repair*
- *Repaired 9/00; Plastic Hose Secondary Containment*
- *Tightness Tested, U.S. Tank Tech., 9/26/00 - Passed*

TANK DATA SHEET
NORTH WHITE PLAINS YARD

TANK SYSTEM		
Tank #: **13L**	Product: **Gasoline**	Date of Installation: **3/91**
Location: **Fuel Island**	Type: **Underground**	Label (Working Capacity): **4,500 Gallons**
Capacity: **5,000 Gallons**	Dispensing Method: **Submersible Pump**	Color Code/Symbol: **Blue/White Cross**

TANK/PIPE CONSTRUCTION		
Tank Material: **Fiberglass Coated Steel**	Tank Leak Detection: **Interstitial Monitoring**	Pipe Corrosion Protection: **Fiberglass**
Tank Secondary Containment: **Double Walled**	Pipe Type: **Underground**	Pipe Leak Detection: **Interstitial Monitoring**
Secondary Containment Size: **NA**	Pipe Material: **Fiberglass**	Gauge/Meter/Alarm: **Gauge**
Tank Corrosion Protection: **Fiberglass/Cathodic**	Pipe Secondary Containment: **Double Walled**	Spill/Overflow Protection: **Auto Shut-Off/Catch Basin**

REGISTRATION		
Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
3	**Inventory Monitoring**	**Daily**
6	**Cathodic Protection System Testing**	**Annually**
7	**Leak Detection System Monitoring**	**Weekly**
8	**Leak Detection System Inspection/Testing**	**Monthly**
12	**Reportable Event/Condition**	As Necessary

REMARKS:

TANK DATA SHEET
NORTH WHITE PLAINS YARD

TANK SYSTEM		
Tank #: **13M**	Product: **Diesel**	Date of Installation: **3/91**
Location: **Fuel Island**	Type: **Underground**	Label (Working Capacity): **2,700 Gallons**
Capacity: **3,000 Gallons**	Dispensing Method: **Submersible Pump**	Color Code/Symbol: **Yellow/Hexagon**

TANK/PIPE CONSTRUCTION		
Tank Material: **Fiberglass Coated Steel**	Tank Leak Detection: **Interstitial Monitoring**	Pipe Corrosion Protection: **Fiberglass**
Tank Secondary Containment: **Double Walled**	Pipe Type: **Underground**	Pipe Leak Detection: **Interstitial Monitoring**
Secondary Containment Size: **NA**	Pipe Material: **Fiberglass**	Gauge/Meter/Alarm: **Gauge**
Tank Corrosion Protection: **Fiberglass/Cathodic**	Pipe Secondary Containment: **Double Walled**	Spill/Overflow Protection: **Auto Shut-Off/Catch Basin**

REGISTRATION		
Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
3	**Inventory Monitoring**	**Daily**
6	**Cathodic Protection System Testing**	**Annually**
7	**Leak Detection System Monitoring**	**Weekly**
8	**Leak Detection System Inspection/Testing**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

TANK DATA SHEET
NORTH WHITE PLAINS YARD

TANK SYSTEM

Tank #: **13N**	Product: **#2 Fuel Oil**	Date of Installation: **3/94**
Location: **C&S**	Type: **Underground**	Label (Working Capacity): **9,000 Gallons**
Capacity: **10,000 Gallons**	Dispensing Method: **Suction Pump**	Color Code/Symbol: **Green/Hexagon**

TANK/PIPE CONSTRUCTION

Tank Material: **Fiberglass**	Tank Leak Detection: **Interstitial Monitoring**	Pipe Corrosion Protection: **Fiberglass**
Tank Secondary Containment: **Double Walled/Vault**	Pipe Type: **Underground**	Pipe Leak Detection: **Interstitial Monitoring**
Secondary Containment Size: **NA**	Pipe Material: **Fiberglass**	Gauge/Meter/Alarm: **Gauge**
Tank Corrosion Protection: **Fiberglass**	Pipe Secondary Containment: **Double Walled**	Spill/Overflow Protection: **Auto Shut-Off/Catch Basin**

REGISTRATION

Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
7	**Leak Detection System Monitoring**	**Weekly**
8	**Leak Detection System Inspection/Testing**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

TANK DATA SHEET

NORTH WHITE PLAINS YARD

TANK SYSTEM

Tank #: **14F**	Product: **Diesel**	Date of Installation: **6/92**
Location: **Equipment Wash**	Type: **Aboveground**	Label (Working Capacity): **4,500 Gallons**
Capacity: **5,000 Gallons**	Dispensing Method: **Suction Pump**	Color Code/Symbol: **Yellow/Hexagon**

TANK/PIPE CONSTRUCTION

Tank Material: **Steel**	Tank Leak Detection: **NA**	Pipe Corrosion Protection: **None**
Tank Secondary Containment: **Steel Dike**	Pipe Type: **Aboveground**	Pipe Leak Detection: **NA**
Secondary Containment Size: **5,500 Gallons**	Pipe Material: **Steel/Iron**	Gauge/Meter/Alarm: **Gauge**
Tank Corrosion Protection: **Paint**	Pipe Secondary Containment: **None**	Spill/Overflow Protection: **Gauge**

REGISTRATION

Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
9	**Monthly Inspection of Aboveground Facilities**	**Monthly**
11	**Inspection of Secondary Containment System Prior to The Discharge of Retained Water**	**As Necessary**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

TANK DATA SHEET
NORTH WHITE PLAINS YARD

TANK SYSTEM

Tank #: **15A**	Product: **Diesel**	Date of Installation: **11/00**
Location: **M of W**	Type: **Aboveground**	Label (Working Capacity): **50 Gallons**
Capacity: **55 Gallons**	Dispensing Method: **Gravity**	Color Code/Symbol: **Yellow/Hexagon**

TANK/PIPE CONSTRUCTION

Tank Material: **Steel**	Tank Leak Detection: **None**	Pipe Corrosion Protection: **None**
Tank Secondary Containment: **Floor**	Pipe Type: **Aboveground**	Pipe Leak Detection: **None**
Secondary Containment Size: **NA**	Pipe Material: **Steel/Hose**	Gauge/Meter/Alarm: **None**
Tank Corrosion Protection: **Paint**	Pipe Secondary Containment: **None**	Spill/Overflow Protection: **None**

REGISTRATION

Registration #: **3-496642**	Date of Registration: ~	Renewal Date: ~

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
9	**Monthly Inspection of Aboveground Facilities**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

TANK DATA SHEET

NORTH WHITE PLAINS YARD

TANK SYSTEM

Tank #: **15B**	Product: **#2 Fuel Oil**	Date of Installation: **5/89**
Location: **M of W**	Type: **Underground**	Label (Working Capacity): **18,000 Gallons**
Capacity: **20,000 Gallons**	Dispensing Method: **Suction Pump**	Color Code/Symbol: **Green/Hexagon**

TANK/PIPE CONSTRUCTION

Tank Material: **Fiberglass**	Tank Leak Detection: **Interstitial Monitoring**	Pipe Corrosion Protection: **Fiberglass**
Tank Secondary Containment: **Double Walled**	Pipe Type: **Underground**	Pipe Leak Detection: **Interstitial Monitoring**
Secondary Containment Size: **NA**	Pipe Material: **Fiberglass**	Gauge/Meter/Alarm: **Gauge**
Tank Corrosion Protection: **Fiberglass**	Pipe Secondary Containment: **Double Walled**	Spill/Overflow Protection: **Gauge/Whistle**

REGISTRATION

Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
7	**Leak Detection System Monitoring**	**Weekly**
8	**Leak Detection System Inspection/Testing**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

TANK DATA SHEET
NORTH WHITE PLAINS YARD

TANK SYSTEM		
Tank #: **15C**	Product: **Used Oil**	Date of Installation: **6/92**
Location: **M of W**	Type: **Aboveground**	Label (Working Capacity): **1,800 Gallons**
Capacity: **2,000 Gallons**	Dispensing Method: **Gravity**	Color Code/Symbol: **NA**

TANK/PIPE CONSTRUCTION		
Tank Material: **Steel**	Tank Leak Detection: **NA**	Pipe Corrosion Protection: **None**
Tank Secondary Containment: **Floor**	Pipe Type: **Aboveground**	Pipe Leak Detection: **NA**
Secondary Containment Size: **NA**	Pipe Material: **Steel/Iron**	Gauge/Meter/Alarm: **Gauge**
Tank Corrosion Protection: **Paint**	Pipe Secondary Containment: **Floor**	Spill/Overflow Protection: **Gauge**

REGISTRATION		
Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
9	**Monthly Inspection of Aboveground Facilities**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

TANK DATA SHEET
NORTH WHITE PLAINS

TANK SYSTEM

Tank #: **15D**	Product: **Hydraulic Oil**	Date of Installation: **6/92**
Location: **M of W**	Type: **Aboveground**	Label (Working Capacity): **1,800 Gallons**
Capacity: **2,000 Gallons**	Dispensing Method: **Suction Pump**	Color Code/Symbol: **NA**

TANK/PIPE CONSTRUCTION

Tank Material: **Steel**	Tank Leak Detection: **NA**	Pipe Corrosion Protection: **None**
Tank Secondary Containment: **Floor**	Pipe Type: **Aboveground**	Pipe Leak Detection: **NA**
Secondary Containment Size: **NA**	Pipe Material: **Steel/Iron**	Gauge/Meter/Alarm: **Gauge**
Tank Corrosion Protection: **Paint**	Pipe Secondary Containment: **Floor**	Spill/Overflow Protection: **Gauge**

REGISTRATION

Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
9	**Monthly Inspection of Aboveground Facilities**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

TANK DATA SHEET
NORTH WHITE PLAINS

TANK SYSTEM

Tank #: **15E**	Product: **Engine Oil**	Date of Installation: **6/92**
Location: **M of W**	Type: **Aboveground**	Label (Working Capacity): **1,800 Gallons**
Capacity: **2,000 Gallons**	Dispensing Method: **Suction Pump**	Color Code/Symbol: **NA**

TANK/PIPE CONSTRUCTION

Tank Material: **Steel**	Tank Leak Detection: **NA**	Pipe Corrosion Protection: **None**
Tank Secondary Containment: **Floor**	Pipe Type: **Aboveground**	Pipe Leak Detection: **NA**
Secondary Containment Size: **NA**	Pipe Material: **Steel/Iron**	Gauge/Meter/Alarm: **Gauge**
Tank Corrosion Protection: **Paint**	Pipe Secondary Containment: **Floor**	Spill/Overflow Protection: **Gauge**

REGISTRATION

Registration #: **3-496642**	Date of Registration: **12/28/00**	Renewal Date: **1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
9	**Monthly Inspection of Aboveground Facilities**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

TANK DATA SHEET

NORTH WHITE PLAINS YARD

TANK SYSTEM

Tank #:	Product:	Date of Installation:
15F	**Diesel**	**6/92**
Location:	Type:	Label (Working Capacity):
Equipment Wash	**Aboveground**	**270 Gallons**
Capacity:	Dispensing Method:	Color Code/Symbol:
300 Gallons	**Suction Pump**	**Yellow/Hexagon**

TANK/PIPE CONSTRUCTION

Tank Material:	Tank Leak Detection:	Pipe Corrosion Protection:
Steel	**NA**	**Paint**
Tank Secondary Containment:	Pipe Type:	Pipe Leak Detection:
Floor	**Aboveground**	**NA**
Secondary Containment Size:	Pipe Material:	Gauge/Meter/Alarm:
NA	**Steel/Iron**	**Gauge**
Tank Corrosion Protection:	Pipe Secondary Containment:	Spill/Overflow Protection:
Paint	**Floor**	**Gauge**

REGISTRATION

Registration #:	Date of Registration:	Renewal Date:
3-496642	**12/28/00**	**1/2/06**

PRODUCT STORAGE & HANDLING REQUIREMENTS

SOP#	DESCRIPTION	FREQUENCY
1	**Spill/Leak/Discharge Response**	**As Necessary**
2	**Oversight of Transfer Operations**	**As Necessary**
9	**Monthly Inspection of Aboveground Facilities**	**Monthly**
12	**Reportable Event/Condition**	**As Necessary**

REMARKS:

APPENDIX B

STANDARD OPERATING PROCEDURES

SOP-1 SPILL/LEAK/DISCHARGE RESPONSE

The following are general spill response guidelines to be implemented by the Responsible-Party (RP) and/or Metro-North Railroad personnel. However, each spill situation is unique, and it is the responsibility of the RP to direct the specific actions required to control and remediate a spill/leak/discharge.

- *Assess the spill/leak/discharge, and identify the source and product.*
- *Make a determination if an explosion/fire danger exists and whether the response can be performed using available manpower, materials, and equipment or whether additional support is required.*
- *Notify the Metro-North Railroad Department of Environmental Compliance and Services; the Fire Department if an explosion/fire danger exists; the spill response contractor (SRC) if additional manpower, materials and equipment are required.*

NOTIFICATION:	***TELEPHONE #***
Environmental Services & Compliance	*1-914-686-8681*
Rail Traffic Controller	*1-212-340-2050*
Fire Department	*911*
Fleet Environmental (SRC)	*1-203-744-3477*

The Department of Environmental Compliance and Services is responsible for reporting a spill/leak/discharge to the National Response Center (see SPCC Plan), and the New York State Department of Environmental Conservation (NYSDEC) within 2 hours of its discovery. If the RP is unable to notify the Department of Environmental Compliance and Services within 2 hours of its discovery, the RP shall report the spill/leak/discharge directly to the Rail Traffic Controller.

- *When a response can be made safely, stop the flow from reaching navigable waters and stop/mitigate the source of the spill.*
- *Once under control, reassess the situation and develop and implement an action plan for clean up.*

- *Decontaminate spill response equipment and dispose of product and contaminated materials in accordance with applicable regulations and with chain-of-custody documentation. If unsure of how to dispose of contaminated materials, call the Department of Environmental Services and Compliance or the designated spill response contractor for assistance.*
- *A spill/leak/discharge is a reportable event/condition. The RP shall record and document a spill/leak/discharge on Form F-3; refer to SOP-12.*

NOTE: The following spill kit response equipment/materials are located at the storerooms and on the shop floors.

Water repellent sorbent pillows
Water repellent sorbent pads
Water repellent sorbent skimmer booms
Brooms, shovels, containment drums

SOP-1
SPILL/LEAK/DISCHARGE RESPONSE

The following are general spill response guidelines to be implemented by the Responsible-Party (RP) and/or Metro-North Railroad personnel. However, each spill situation is unique, and it is the responsibility of the RP to direct the specific actions required to control and remediate a spill/leak/discharge.

- o ASSESS THE SPILL/LEAK/DISCHARGE, AND IDENTIFY THE SOURCE AND PRODUCT.

- o MAKE A DETERMINATION IF AN EXPLOSION/FIRE DANGER EXISTS AND WHETHER THE RESPONSE CAN BE PERFORMED USING AVAILABLE MANPOWER, MATERIALS AND EQUIPMENT OR WHETHER ADDITIONAL SUPPORT IS REQUIRED.

- o NOTIFY THE METRO-NORTH RAILROAD DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES ; THE FIRE DEPARTMENT IF AN EXPLOSION/FIRE DANGER EXISTS; THE SPILL RESPONSE CONTRACTOR (SRC) IF ADDITIONAL MANPOWER, MATERIALS AND EQUIPMENT ARE REQUIRED.

NOTIFICATION	TELEPHONE NO
METRO NORTH RAILROAD DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES	1-914-686-8681
RAIL TRAFFIC CONTROLLER	1-212-340-2050
LOCAL POLICE/FIRE DEPARTMENT	911
FLEET ENVIRONMENTAL (SPILL RESPONSE CONTRACTOR)	1-203-744-3477

The Department of Environmental Compliance and Services is responsible for reporting a spill/leak/discharge to the National Response Center (see SPCC Plan), and the New York State Department of Environmental Conservation (NYSDEC) within 2 hours of its discovery. If the RP is unable to notify the Department of Environmental Compliance and Services within 2 hours of its discovery, the RP shall report the spill/leak/discharge directly to the Rail Traffic Controller.

- o WHEN A RESPONSE CAN BE MADE SAFELY, STOP THE FLOW FROM REACHING NAVIGABLE WATERS AND STOP/MITIGATE THE SOURCE OF THE SPILL

- o ONCE UNDER CONTROL, RE-ASSESS THE SITUATION AND DEVELOP AND IMPLEMENT AN ACTION PLAN FOR CLEANUP.

- o DECONTAMINATE SPILL RESPONSE EQUIPMENT AND DISPOSE OF PRODUCT AND CONTAMINATED MATERIALS IN ACCORDANCE WITH APPLICABLE REGULATIONS AND WITH CHAIN-OF-CUSTODY DOCUMENTATION. IF UNSURE OF HOW TO DISPOSE OF CONTAMINATED MATERIALS, CALL THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES OR THE DESIGNATED SPILL RESPONSE CONTRACTOR FOR ASSISTANCE.

SOP-1
SPILL/LEAK/DISCHARGE RESPONSE
(Continued)

- A SPILL/LEAK/DISCHARGE IS A REPORTABLE EVENT/CONDITION. THE RP SHALL RECORD AND DOCUMENT A SPILL/LEAK/DISCHARGE ON FORM F-3; REFER TO SOP-12.

NOTE: The following response equipment/materials are located at the storerooms and on shop floors:

Water repellent sorbent pillows
Water repellent sorbent pads
Water repellent sorbent skimmer booms
Brooms, shovels, containment drums

SOP-2 OVERSIGHT OF TRANSFER OPERATIONS

- 6 NYCRR Part 613.3(a) establishes that the operator, when on the premises or when in control, is responsible for the transfer operations. In the absence of the operator, the carrier is responsible.

- 40 CFR Part 112.7(e)(8) (SPCC Plan) establishes the requirement that a record of inspections (e.g., transfer operations) be made and maintained for a period of three (3) years.

- 40 CFR Part 112.7(e)(8) (SPCC Plan) establishes the requirement that a record of inspections (e.g., transfer operations) be made and maintained for a period of three (3) years.

SOP-2
OVERSIGHT OF TRANSFER OPERATIONS

The following are general oversight guidelines to be followed by the Responsible-Party (RP) and/or Metro-North Railroad personnel at the time of any product transfer operations.

- CONFIRM WHICH TANK IS TO RECEIVE PRODUCT; THE PRODUCT IS CORRECT FOR THE TANK; THE TANK HAS AVAILABLE CAPACITY.
- SHUT OFF ALL UNNECESSARY LIGHTS/ELECTRICAL EQUIPMENT.
- CHECK THE CARRIER THAT THE PARKING BRAKE IS SET, AND THAT WHEEL CHOCKS ARE IN PLACE. IF THE PRODUCT IS FLAMMABLE, NO ONE SHOULD BE IN THE CARRIER CAB.
- CHECK THAT SORBENT MATERIALS ARE AVAILABLE TO RESPOND TO MINOR SPILLAGE DURING LOADING/UNLOADING OPERATIONS.
- IF BONDING IS REQUIRED (I.E., DURING THE TRANSFER OF CLASS 3 [FLAMMABLE LIQUID] MATERIALS), ATTACH THE BOND WIRE PRIOR TO OPENING THE COVERS AND KEEP IT CONNECTED UNTIL THE OPERATION IS COMPLETED AND ALL COVERS ARE CLOSED.
- CHECK THE CARRIER TANK VALVES, PUMPS, AND HOSES TO VERIFY THAT THEY ARE NOT LEAKING, AND PLACE DRIP PANS BENEATH ALL TEMPORARY CONNECTIONS (I.E., HOSE CONNECTIONS).
- MONITOR THE PRODUCT TRANSFER OPERATION AT ALL TIMES. DO NOT BYPASS DEADMAN CONTROLS, IF SO EQUIPPED.
- ONLY FILL THE TANK TO THE DESIGN CAPACITY TO ALLOW FOR EXPANSION OF THE PRODUCT.
- INSPECT CARRIER TO VERIFY THAT ALL HOSE CONNECTIONS HAVE BEEN PROPERLY DISCONNECTED, THERE ARE NO LEAKS FORM VALVES OR PUMPS, AND THAT ALL COVERS HAVE BEEN SECURELY CLOSED.
- VISUALLY INSPECT THE TRANSFER AREA TO VERIFY THAT ANY LEAKS OR DRIPS HAVE BEEN PROPERLY CLEANED UP AND THAT HOSED, VALVES AND PUMPS ARE PROPERLY SECURED. LOCK ALL PUMP CONTROLS AND VALVES AS NECESSARY.
- LOG THE TRANSFER OPERATION IN THE LOG AT APPENDIX C OF VOLUME III.

SOP-3 INVENTORY MONITORING

- 6 NYCRR Part 613.4 establishes the requirement that inventory monitoring must be performed for underground storage tank facilities.

- 6 NYCRR Part 613.4(a)(2) establishes that annual standpipe testing or other method acceptable to the NYSDEC (e.g., annual precision tightness testing) can be used as an alternative to inventory monitoring if the tank is unmetered or if the product is consumed on premises.

- 6 NYCRR Part 613.4(d) establishes the allowable inventory discrepancy and water accumulation, and the requirement that if a discrepancy/water accumulation cannot be resolved through other factors, the tank system shall be taken out of service and repaired or replaced.

- Refer to NYSDEC TOGS 4.1.4 for inventory monitoring technical guidance.

NOTE: TOGS 4.1.4 IDENTIFIES THAT IT IS THE NYSDEC's INTENT TO AMEND THE LAW TO ALLOW THE USE OF LEAK MONITORING SYSTEMS AS AN ACCEPTABLE INVENTORY METHOD FOR TANK SYSTEMS WHICH MEET THE REQUIREMENTS OF 6 NYCRR PART 614.

SOP-3
INVENTORY MONITORING

The Responsible-Party (RP) is responsible for performing and maintaining a record of the inventory monitoring. The attached Inventory Worksheet Record form (F-1) is to be filled out and reconciled as follows:

- ONCE A DAY, AT APPROXIMATELY THE SAME TIME OF DAY, PERFORM THE ASSOCIATED TASKS AND COMPLETE FORM F-1. FILL IN THE COLUMNS AS NUMBERED BELOW:

COLUMN	INFORMATION
1	DATE
2	PREVIOUS MEASURED PRODUCT AMOUNT IN THE TANK. CARRY-OVER FROM COLUMN 5.
3	METERED PRODUCT QUANTITY DELIVERED SINCE THE PREVIOUS TANK MEASUREMENT.
4	METERED PRODUCT QUANTITY DISPENSED SINCE THE PREVIOUS TANK MEASUREMENT.
5	PRESENT MEASURED PRODUCT AMOUNT IN THE TANK.
6	CALCULATE LOSS OR GAIN (COLUMNS 5 + 4 - 3 - 2). A NEGATIVE VALUE IS A LOSS AND A POSITIVE VALUE IS A GAIN.
7	PREVIOUS WATER LEVEL MEASUREMENT IN TANK. CARRY-OVER FROM COLUMN 8.
8	PRESENT WATER LEVEL MEASUREMENT IN TANK MEASURED TO THE NEAREST 1/8 INCH.
9	CALCULATE LOSS OR GAIN (COLUMNS 8 - 7). A NEGATIVE VALUE IS A LOSS AND A POSITIVE VALUE IS A GAIN.
10	INITIALS OF THE PERSON TAKING THE MEASUREMENTS.

SOP-3
INVENTORY MONITORING
(Continued)

- EVERY TEN (10) DAYS, RECONCILE THE INVENTORY MONITORING RECORD BY ADDING THE NUMBERS IN COLUMNS 3, 6 AND 9, WRITING THE SUMS AT THE BOTTOM OF THE COLUMNS AND DETERMINE IF AN ABNORMAL LOSS OR GAIN OF PRODUCT HAS OCCURRED. AN ABNORMAL LOSS OR GAIN IS DEFINED AS FOLLOWS:

  - AN INVENTORY LOSS.
  - A RECURRING ACCUMULATION OF WATER IN THE BOTTOM OF THE TANK.
  - AN APPARENT 10-DAY PRODUCT LOSS OR GAIN EXCEEDING 0.75% OF THE TANK VOLUME.
  - AN APPARENT 10-DAY PRODUCT LOSS OR GAIN EXCEEDING 0.75% TIMES THE AMOUNT OF PRODUCT DELIVERED FOR THAT PERIOD.

  TANK VOLUME AND PRODUCT DELIVERED CALCULATIONS ARE PERFORMED AT THE BOTTOM OF FORM F-1.

- WHEN THE INVENTORY MONITORING INDICATES AN ABNORMAL LOSS OR GAIN OF PRODUCT, THE POSSIBLE CAUSES SHALL BE INVESTIGATED. THE INVESTIGATION SHALL INCLUDE INVENTORY RECORD ERROR, PROPER CALIBRATION OF METER AND MEASUREMENT DEVICES, VISUAL INSPECTION OF ACCESSIBLE TANK SYSTEM COMPONENTS FOR EVIDENCE OF FAILURE.

- IF WITHIN 48 HOURS, THE CAUSE OF ABNORMAL LOSS OR GAIN OF PRODUCT CAN NOT BE EXPLAINED BY FACTORS NOT RELATED TO LEAKAGE, THIS CONDITION IS A REPORTABLE EVENT/CONDITION. NOTIFY THE METRO-NORTH RAILROAD DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES; REFER TO SOP-12. REMOVE THE TANK FROM SERVICE UNTIL SUCH TIME THAT THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES APPROVES ITS REUSE.

- THE RP SHALL FILE A COPY OF THE INVENTORY MONITORING WORKSHEET RECORD FORM AT APPENDIX D OF VOLUME III.

F-1

INVENTORY MONITORING WORKSHEET RECORD

TANK # ____

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
DATE	PREVIOUS MEASURED PRODUCT IN TANK (Gallons)	METERED PRODUCT DELIVERED (Gallons)	METERED PRODUCT DISPENSED (Gallons)	MEASURED PRODUCT IN TANK (Gallons)	PRODUCT LOSS (-) GAIN (Gallons)	PREVIOUS MEASURED WATER LEVEL IN TANK (Inches)	MEASURED WATER LEVEL IN TANK (Inches)	WATER LOSS (-) GAIN (Inches)	INITIALS
	SUM			SUM			SUM		

Tank Volume: _____ Gallons

0.75% Tank Volume = _____ Gallons x 0.0075 = _____ Gallons

0.75% Product Delivered (Sum of Column 3) = _____ Gallons x 0.0075 = _____ Gallons

Apparent Product Loss (-) or Gain (Sum of Column 6) = _____ Gallons

Water Accumulations (Sum of Column 9) = _____ Inches

Investigation Required: ☐ Yes ☐ No

SIGNATURE: _____ DATE: _____

SOP-4 TIGHTNESS TESTING

- 6 NYCRR Part 613.5(a) establishes the requirement that underground tanks and piping, which do not conform to Part 614 standards, must be tightness tested every five (5) years.

- 40 CFR Part 280.41(b) establishes the requirements that (1) underground pressure piping, which does not conform to Part 280.2 (Part 614) standards, must be tightness tested every year, and (2) underground suction piping which does not conform to Part 280.2 (Part 614) standards must be tightness tested every three (3) years. The exception to requiring tightness testing of suction piping is if the following conditions are met:

- *the piping operates at less than atmospheric pressure*
- *the piping is sloped so that the contents of the pipe will drain back into the tank*
- *there is only one (1) check valve in the suction line, located directly below and close to the suction pump*

NOTE: IN THE CASE OF ALL HEATING OIL TANK SYSTEMS, THE POSITION HAS BEEN TAKEN THAT THIS EXCEPTION IS APPLICABLE

- 6 NYCRR Part 613.4(A)(2) allows the use of annual tightness testing as an alternative to inventory monitoring if the tank is unmetered or if the product is consumed on premises.

- 6 NYCRR Part 613.5(a)(5) establishes the requirement that any part of a tank system which fails tightness testing must be emptied, replace or repaired or taken out of service.

- Refer to NYSDEC TOGS 4.1.2 and SPOTS Memo #2 for precision tightness testing technical guidance.

SOP-4
TIGHTNESS TESTING

The Metro-North Railroad Department of Environmental Compliance and Services will arrange for the tank system tightness testing to be performed by a qualified outside contractor. The Responsible-Party (RP) is to assist the Department of Environmental Compliance and Services as identified below.

- THE RP SHALL NOTIFY THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES A MINIMUM OF 60 DAYS PRIOR TO THE REQUIRED TESTING DATE.

- THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES WILL COORDINATE WITH THE OUTSIDE CONTRACTOR, AND WILL ALSO IDENTIFY TO THE RP ANY SPECIAL CONDITIONS WHICH MAY BE REQUIRED TO PERFORM THE TIGHTNESS TEST (E.G., COMPLETELY FULL TANK, ETC.), THE LENGTH OF TIME TANK SYSTEM WILL BE DOWN, AND THE DATE OF TESTING.

- THE RP SHALL BE AVAILABLE TO THE OUTSIDE CONTRACTOR AT THE TIME OF THE TIGHTNESS TESTING TO FACILITATE ACCESS, OBSERVE THE TESTING AND ASSIST.

- UPON COMPLETION OF THE TIGHTNESS TESTING, THE CONTRACTOR SHALL PREPARE AND SUBMIT A TEST REPORT WHICH SHALL INCLUDE THE FOLLOWING INFORMATION:

    - FACILITY REGISTRATION NUMBER
    - TANK SYSTEM IDENTIFICATION NUMBER
    - DATE OF TEST
    - RESULTS OF TEST
    - TEST METHOD UTILIZED
    - CERTIFICATION STATEMENT BY TESTING TECHNICIAN
    - STATEMENT OF THE TECHNICIANS QUALIFICATIONS
    - ADDRESS OF THE TECHNICIAN
    - SIGNATURE OF THE TECHNICIAN

  A COPY OF THE TIGHTNESS TESTING REPORT SHALL BE FORWARDED TO THE RP AND THE RP SHALL MAINTAIN A COPY OF THE REPORT FILED AT APPENDIX E IN VOLUME III.

- FAILURE OF THE TIGHTNESS TESTING IS CONSIDERED A REPORTABLE EVENT/CONDITION. IF A TANK FAILS THE TIGHTNESS TESTING, NOTIFY THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES; REFER TO SOP-12.

SOP-5 STANDPIPE TESTING

- 6 NYCRR Part 613.4(a)(2) allows the use of annual standpipe testing as an alternative to inventory monitoring if the tank is unmetered or if the product is consumed on premises.

- 6 NYCRR Part 613.5(a)(5) establishes the requirement that any part of a tank system which fails standpipe testing must be emptied, replaced or repaired or taken out of service.

- Refer to NYSDEC guidance paper Standpipe Testing of Underground Storage Tanks for technical guidance.

SOP-5
STANDPIPE TESTING

The Metro-North Railroad Environmental Compliance and Services Department will arrange for the standpipe testing to be performed by a qualified outside contractor. The Responsible-Party (RP) is to assist the Department of Environmental Compliance and Services as identified below.

- THE RP SHALL NOTIFY DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES A MINIMUM OF 60 DAYS PRIOR TO THE REQUIRED TESTING DATE.

- THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES WILL COORDINATE WITH THE OUTSIDE CONTRACTOR, AND WILL ALSO IDENTIFY TO THE RP ANY SPECIAL CONDITIONS WHICH MAY BE REQUIRED TO PERFORM THE TANK STANDPIPE TEST (E.G. COMPLETELY FULL TANK, ETC.), THE LENGTH OF TIME TANK SYSTEM WILL BE DOWN, AND THE DATE OF TESTING.

- THE RP SHALL BE AVAILABLE TO THE OUTSIDE CONTRACTOR AT THE TIME OF STANDPIPE TESTING TO FACILITATE ACCESS, OBSERVE THE TESTING AND ASSIST.

- UPON COMPLETION OF THE TANK STANDPIPE TESTING, THE CONTRACTOR SHALL PREPARE AND SUBMIT A TEST REPORT WHICH SHALL INCLUDE THE FOLLOWING INFORMATION:

    - FACILITY REGISTRATION NUMBER
    - TANK SYSTEM IDENTIFICATION NUMBER
    - DATE OF TEST
    - RESULTS OF TEST
    - ADDRESS OF THE TECHNICIAN
    - SIGNATURE OF THE TECHNICIAN

    A COPY OF THE TANK STANDPIPE TESTING REPORT SHALL BE FORWARDED TO THE RP AND THE RP SHALL MAINTAIN A COPY OF THE REPORT FILED AT APPENDIX F IN VOLUME III.

- FAILURE OF THE TANK STANDPIPE TESTING IS A REPORTABLE EVENT/CONDITION. IF A TANK FAILS THE TIGHTNESS TESTING, NOTIFY THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES; REFER TO SOP-12.

SOP-6 CATHODIC PROTECTION SYSTEM TESTING

- 6 NYCRR Part 613.5(b)(2) establishes that cathodic protection systems must be tested annually.

- 6 NYCRR Part 613.5(b)(2) establishes the requirement that if a cathodic protection system fails testing it must be repaired within thirty (30) days or the tank system will be subject to unprotected tank tightness testing requirements.

- 40 CFR Part 280.21 establishes that qualifying tank systems must be upgraded to include corrosion protection by December 22, 1998.

SOP-6
CATHODIC PROTECTION SYSTEM TESTING

The Metro-North Railroad Environmental Compliance and Services Department will arrange for the cathodic protection system testing to be performed by a qualified outside contractor. The Responsible-Party (RP) is to assist the Department of Environmental Compliance and Services as identified below.

- THE RP SHALL NOTIFY DEPARTMENTOF ENVIRONMENTAL COMPLIANCE AND SERVICES A MINIMUM OF 60 DAYS PRIOR TO THE REQUIRED TESTING DATE.

- THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES WILL COORDINATE WITH THE OUTSIDE CONTRACTOR, AND WILL ALSO IDENTIFY TO THE RP ANY SPECIAL CONDITIONS WHICH MAY BE REQUIRED TO PERFORM THE CATHODIC PROTECTION SYSTEM TEST, THE LENGTH OF TIME TANK SYSTEM WILL BE DOWN, AND THE DATE OF TESTING.

- THE RP SHALL BE AVAILABLE TO THE OUTSIDE CONTRACTOR AT THE TIME OF CATHODIC PROTECTION SYSTEM TESTING TO FACILITATE ACCESS, OBSERVE THE TESTING AND ASSIST.

- UPON COMPLETION OF THE CATHODIC PROTECTION SYSTEM TESTING, THE CONTRACTOR SHALL PREPARE AND SUBMIT A TEST REPORT WHICH SHALL INCLUDE THE FOLLOWING INFORMATION:

    - FACILITY REGISTRATION NUMBER
    - TANK SYSTEM IDENTIFICATION NUMBER
    - DATE OF TEST
    - RESULTS OF TEST
    - ADDRESS OF THE TECHNICIAN
    - SIGNATURE OF THE TECHNICIAN

    A COPY OF THE CATHODIC PROTECTION SYSTEM TESTING REPORT SHALL BE FORWARDED TO THE RP AND THE RP SHALL MAINTAIN A COPY OF THE REPORT FILED AT APPENDIX G IN VOLUME III.

- IF A CATHODIC PROTECTION SYSTEM IS NOT FUNCTIONING, NOTIFY THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES.

SOP-7 LEAK DETECTION SYSTEM MONITORING

- 6 NYCRR Part 613.5(b)(3) establishes that leak detection systems must be monitored weekly.

- 6 NYCRR Part 613.5(a)(5) establishes the requirement that any tank which leaks must be emptied, replaced or repaired or taken out of service.

SOP-7
LEAK DETECTION SYSTEM MONITORING

Leak detection system monitoring is the responsibility of the Responsible-Party (RP). The monitoring procedures are dependent upon the type of leak detection as follows:

IN-TANK MONITORING SYSTEMS

- CHECK ALARM SENSOR OR PRINTOUT FOR INDICATIONS OF A LEAK.

INTERSTITIAL MONITORING SYSTEMS

- FOR ELECTRONIC SYSTEMS, CHECK ALARM SENSOR OR PRINTOUT FOR INDICATIONS OF A BREACH.
- FOR PRESSURE AND VACUUM SYSTEMS, CHECK VACUUM/PRESSURE GAUGE FOR INDICATIONS OF A CHANGE IN PRESSURE, WHICH INDICATES A BREACH.
- FOR MANUAL SYSTEMS, CHECK MONITORING PORT WITH A PETROLEUM VAPOR ANALYZER FOR VAPOR READINGS ABOVE BACKGROUND READINGS, OR CHECK THE MONITORING PORT FOR LIQUID PRODUCT WITH A MONITORING STICK FOR LIQUID PRODUCT, WHICH WOULD BE INDICATIONS OF A BREACH.

VAPOR AND/OR GROUNDWATER OBSERVATION WELLS

- FOR VAPOR MONITORING WELLS, CHECK THE MONITORING WELL WITH A PETROLEUM VAPOR ANALYZER FOR VAPOR READINGS ABOVE BACKGROUND READINGS, WHICH WOULD INDICATE A LEAK.
- FOR GROUNDWATER MONITORING WELLS, CHECK THE MONITORING WELL WITH A BAILER OR PRODUCT SENSOR CAPABLE OF DETECTING 0.125 INCHES OF FLOATING FREE PRODUCT, WHICH WOULD INDICATE A LEAK.
- UPON COMPLETION OF THE MONITORING OF THE LEAK DETECTION SYSTEM, THE RP SHALL LOG THE LEAK DETECTION SYSTEM MONITORING IN THE LOG AT APPENDIX H OF VOLUME III.
- DETECTION OF A LEAK OR BREACH OF THE INTERSTITIAL SPACE OF A DOUBLE WALLED TANK IS A REPORTABLE EVENT/CONDITION. IF A LEAK OR BREACH IS DISCOVERED, NOTIFY THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES; REFER TO SOP-12.

SOP-8 LEAK DETECTION SYSTEM INSPECTION/TESTING

- 6 NYCRR Part 613.5(b)(3) establishes that leak detection systems must be inspected/tested monthly.

- 6 NYCRR Part 613.5(b)(3) establishes the requirement that if a leak detection system fails inspection/testing it must be repaired within thirty (30) days or the tank system will be subject to unprotected tank tightness testing requirements.

SOP-8
LEAK DETECTION SYSTEM INSPECTION/TESTING

Leak detection system inspection/testing is the responsibility of the Responsible-Party (RP); however, a qualified electrical technician must perform the inspection/testing of electronic systems. The Metro-North Railroad Department of Environmental Compliance and Services Department will arrange for the leak detection system inspection/testing of electronic systems with the RP assisting the Department of Environmental Compliance and Services as identified below.

- FOR ELECTRONIC DETECTION SYSTEMS, THE SYSTEM MUST BE INSPECTED/TESTED FOR PROPER WORKING ORDER BY A QUALIFIED ELECTRICAL TECHNICIAN. THE RP SHALL BE AVAILABLE TO THE TECHNICIAN AT THE TIME OF INSPECTION/TESTING TO FACILITATE ACCESS, OBSERVE THE TESTING AND ASSIST.

- FOR PRESSURE, VACUUM AND MANUAL SYSTEMS, THE RP SHALL VISUALLY INSPECT THE SYSTEM FOR OBVIOUS DAMAGE OR INDICATIONS OF UNAUTHORIZED ACCESS.

- UPON COMPLETION OF THE INSPECTION/TESTING OF THE LEAK DETECTION SYSTEM THE RP SHALL LOG THE INSPECTION/TESTING IN THE LOG AT APPENDIX I IN VOLUME III.

- IF A LEAK DETECTION SYSTEM IS NOT FUNCTIONING, NOTIFY THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES.

SOP-9 MONTHLY INSPECTION OF ABOVEGROUND FACILITIES

- 6 NYCRR Part 613.6(a) establishes the requirement that aboveground tank facilities must be inspected at least monthly.

- 6 NYCRR Part 613.6(d) establishes the requirement that any tank system deficiencies identified through an inspection must be repaired promptly.

- 6 NYCRR Part 613.6(e) establishes the requirement that any portion of a system which is not inspected must be taken out of service.

CERTIFICATE OF UNDERGROUND STORAGE TANK SYSTEM TESTING

Crompco Corporation
1201 DeKalb Pike
Blue Bell, PA 19422
Phone: (610) 278-7203
Fax: (610) 278-7621

Test Date:	12/20/2000	Station #:	
Client:	Rad Energy Peter Hughes	Site:	Metro North Fisher Lane North White Plains, NY
Work Order #:	16102	County:	
PO#		State ID:	

Cathodic Protection Tank Tests

Tank Number	Product	Result
1	Diesel	Pass
2	Regular	Pass

Attachments

Test Detail

The above test(s) were conducted at the indicated site in accordance with all applicable portions of Federal, NFPA, and local Regulations.

SOP-9
MONTHLY INSPECTION OF ABOVEGROUND FACILITIES

The monthly inspection of all aboveground tank systems is the responsibility of the Responsible-Party (RP). The attached Monthly Inspection Record form (F-2) is to be filled out to document the inspection activity.

- PERFORM THE MONTHLY INSPECTION, FILING OUT FORM F-2 BY CIRCLING THE LISTED RESPONSE TO THE OBSERVATION MADE.
- WHERE A CIRCLED LISTED RESPONSE IS UNDERLINED, CORRECTIVE ACTIONS ARE REQUIRED.
- NOTE THE CONDITION WHICH REQUIRES CORRECTIVE ACTION AT THE BOTTOM OF FORM F-2.
- IMPLEMENT THE REQUIRED CORRECTIVE ACTION AND DOCUMENT ITS CORRECTION AT THE BOTTOM OF FORM F-2.
- THE RP SHALL FILE A COPY OF THE MONTHLY INSPECTION RECORD AT APPENDIX J OF VOLUME III.

MONTHLY INSPECTION RECORD
TANK # _____

CIRCLE THE APPROPRIATE CONDITION

Y = YES N = NO S = SATISFACTORY U = UNSATISFACTORY

TANK AREA

1.	Stained Soils/Pavement	Y	N
2.	Distressed Vegetation	Y	N
3.	Debris	Y	N
4.	Excessive Vegetation	Y	N

TANK SHELL

1.	Leaks	Y	N
2.	Stains	Y	N
3.	Discoloration	Y	N
4.	Corrosion	Y	N
5.	Cracks	Y	N
6.	Bulging	Y	N
7.	Paint/Coating	U	S

SECONDARY CONTAINMENT

1.	Sheen	Y	N
2.	Water Level	U	S
3.	Debris	Y	N
4.	Liner Condition	U	S
5.	Drain Locked	N	Y

TANK FOUNDATION

1.	Settlement	Y	N
2.	Cracks	Y	N
3.	Loosened Anchors	Y	N

PIPING

1.	Leaks	Y	N
2.	Stains	Y	N
3.	Discoloration	Y	N
4.	Corrosion	Y	N
5.	Damage	Y	N
6.	Paint/Coating	U	S
7.	Supports	U	S
8.	Valves Locked	N	Y

EQUIPMENT/MISCELLANEOUS

1.	Level Gauge	U	S
2.	Vent Clear	N	Y
3.	Overfill Catchbasin	U	S
4.	Color Code	N	Y
5.	Symbol	N	Y
6.	Signs	U	S

IF THE CIRCLED RESPONSE IS UNDERLINED, THE CONDITION IS TO BE CORRECTED. DOCUMENT THE ITEM BELOW AND IDENTIFY THE ACTIONS TAKEN TO CORRECT THE CONDITION.

ITEM/CORRECTIVE ACTION

SIGNATURE: _____ DATE: _____

p:\mnaform

MONTH/YEAR _____ PETROLEUM BULK STORAGE TANK INSPECTION WORKSHEET
INSPECTOR _____ METRO-NORTH RAILROAD / NORTH WHITE PLAINS YARD
Signature Facility Registration # _____

613.6 ABOVE GROUND STORAGE FACILITIES – INSPECTIONS

(a) Monthly inspections. The owner or operator of an aboveground storage facility must inspect the facility at least monthly. This must include:

(1) inspecting exterior surfaces of tanks, pipes, valves and other equipment for leaks and maintenance deficiencies;

(2) identifying cracks, areas of wear, corrosion and thinning, poor maintenance and operating practices, excessive settlement of structures, separation or swelling of tank insulation, malfunctioning equipment and structural and foundation weaknesses; and

(3) inspecting and monitoring all leak detection systems, cathodic protection monitoring equipment, or other monitoring or warning systems which may be in place at the facility.

			Date Checked	OK	Need for repair (Describe over)
Equipment Wash Shed	3000G Diesel	14F			
	300G Diesel	15F			
Maintenance of Way	Used oil	15C			
	Hydraulic oil	15D			
	Engine oil	15E			

Mark OK or "X" to indicate problem. Describe on back of this sheet.

613.5(b)(3) UNDERGROUND STORAGE FACILITIES TESTING AND MONITORING

(b) Monitoring of corrosion resistant tanks and pipes

(3) The owner or operator must monitor for traces of petroleum at least once per week. All monitoring systems must be inspected monthly. Monitoring systems must be kept in proper working order. If at any time the monitoring systems must be kept in proper working order. If at any time the monitoring system fails to function effectively, it must be repaired within thirty (30) days. Any tank or piping system with a non-working monitoring system must be tested for tightness within one (1) year and retested every five (5) years thereafter until the tank is permanently closed.

Weekly leak detection – check interstitial space alarm
Monthly leak detection – test monitoring system

			Weekly Check - Dates					Monthly Check
T & E	500 gal Fuel Oil	13K						
C & S	10,000 gal Fuel Oil	13N						
M of W	20,000 gal Fuel Oil	15B						

Mark OK or "X" to indicate problem. Describe on back of this sheet.

SOP-10 TEN (10) YEAR INSPECTION OF ABOVEGROUND TANKS

- 6 NYCRR Part 613.6(b) establishes the requirement that aboveground tanks with a capacity of ten thousand (10,000) gallons which are not entirely aboveground must have a detailed inspection in accordance with Part 613.6(b)(3) every ten (10) years.

- 6 NYCRR Part 613.6(d) establishes the requirement that any tank system deficiencies identified through an inspection must be repaired promptly.

- 6 NYCRR Part 613.6(d) establishes the requirement that any portion of a system which is not inspected must be taken out of service.

SOP-10
TEN (10)-YEAR INSPECTION OF ABOVEGROUND TANKS

The Metro-North Railroad Department of Environmental Compliance and Services will arrange for ten (10)-year inspection to be performed by a qualified outside contractor. The Responsible-Party is to assist the Department of Environmental Compliance and Services as identified below:

- THE RP SHALL NOTIFY THE DEPARTMENT OF ENVIRONMENTAL COMPLIANCE AND SERVICES A MINIMUM OF 120 DAYS PRIOR TO THE REQUIRED INSPECTION DATE.

- THE DEPARTMENT OF ENVIROMENTAL COMPLIANCE AND SERVICES WILL COORDINATE WITH THE OUTSIDE CONTRACTOR, AND WILL ALSO IDENTIFY TO THE RP ANY SPECIAL CONDITIONS WHICH MAY BE REQUIRED TO PERFORM THE INSPECTION, THE LENGTH OF TIME THE TANK SYSTEM WILL BE DOWN, AND THE DATE OF INSPECTION.

- THE RP SHALL BE AVAILABLE TO THE OUTSIDE CONTRACTOR AT THE TIME OF INSPECTION TO FACILITATE ACCESS, OBSERVE THE INSPECTION AND ASSIST.

- UPON COMPLETION OF THE TEN (10)-YEAR INSPECTION, THE CONTRACTOR SHALL PREPARE AND SUBMIT AN INSPECTION REPORT WHICH SHALL INCLUDE THE FOLLOWING INFORMATION:

    - FACILITY REGISTRATION NUMBER
    - TANK SYSTEM IDENTIFICATION NUMBER
    - DATE OF INSPECTION
    - RESULTS OF INSPECTION INCLUDING A REPORT ON THE NEED FOR REPAIRS
    - CERTIFICATION BY THE INSPECTOR THAT THE INSPECTION HAS BEEN PERFORMED IN A MANNER CONSISTENT WITH THE 6NYCRR PART 613
    - ADDRESS OF INSPECTOR
    - SIGNATURE OF INSPECTOR

    A COPY OF THE TEN (10)-YEAR INSPECTION REPORT SHALL BE FORWARDED TO THE RP AND THE RP SHALL MAINTAIN A COPY OF THE REPORT AT APPENDIX K IN VOLUME III.

SOP-11 INSPECTION OF SECONDARY CONTAINMENT SYSTEM PRIOR TO THE DISCHARGEOF RETAINED WATER

- 6 NYCRR Part 613.3(c)(6)(iii) establishes the requirement for control of the discharge of water retained within secondary containment systems.

- 40 CFR Part 112.7(e)(8) (SPCC Plan) establishes the requirement that a record of inspections (e.g., visual inspection prior to discharge) be made and maintained for a period of three (3) years. Also, it is a SPDES permit condition that a log of visual inspections prior to discharge be made and maintained for a period of at least three (3) years.

SOP-11
INSPECTION OF SECONDARY CONTAINMENT SYSTEM PRIOR TO THE DISCHARGE OF RETAINED WATER

The Responsible-Party (RP) is responsible for discharging water retained in secondary containment systems.

- O PRIOR TO THE RELEASE OF WATER HELD WITHIN THE SECONDARY CONTAINMENT AREA, VISUALLY INSPECT FOR OIL OR AN OIL SHEEN ON THE SURFACE OF THE WATER.

- O IF OIL OR AN OIL SHEEN ARE OBSERVED;

    - O DETERMINE AND DOCUMENT THE SOURCE OF THE OIL/SHEEN, AND CORRECT THE SITUATION, AND
    - O REMOVE THE OIL/SHEEN AND DISPOSE OF PRODUCT AND CONTAMINATED MATERIALS IN ACCORDANCE WITH APPLICABLE REGULATIONS

- O IF, OR WHEN, OIL OR AN OIL SHEEN IS NOT OBSERVED, THE RETAINED WATER CAN BE DISCHARGED.

- O FOLLOWING REMOVAL OF THE RETAINED WATER, FOR THOSE CONTAINMENT AREAS EQUIPPED WITH A DRAINAGE VALVE, COMPLETELY CLOSE AND LOCK THE DRAINAGE VALVE.

- O LOG THE DRAINAGE OPERATION IN THE LOG AT APPENDIX L OF VOLUME III.

SOP-12 REPORTABLE EVENT/CONDITION

- 6 NYCRR Part 613.8 establishes the requirement for reporting a spill/leak/discharge and for reporting the results of any inventory record, test or inspection which shows a facility is leaking.

ADDITIONAL PART 612 & 614 REPORTING REQUIREMENTS

- *6 NYCRR Part 612.2(b) establishes the requirement that the NYSDEC be notified within thirty (30) days of transfer of facility ownership.*

- *6 NYCRR Part 612.2(d) establishes the requirement that the NYSDEC be notified within thirty (30) days prior to the substantial modification of a facility.*

- *6 NYCRR Part 613.9(c) establishes the requirement that the NYSDEC be notified within thirty (30) days prior to the permanent closure of a facility.*

ADDITIONAL SPCC PLAN REPORTING REQUIREMENTS:

- *FWPCA Section 311(b)(5) establishes the requirement that the National Response Center be notified immediately of the discharge of oil in harmful quantities (produce a sheen) into or upon navigable water. Such an event must also be documented as a part of the SPCC Plan.*

SOP #12
REPORTABLE EVENT/CONDITION

Certain events/conditions are required to be reported to the New York State Department of Environmental Conservation (NYSDEC), and to the National Response Center (NRC) (see SPCC Plan). The Responsible-Party (RP) is responsible for immediately reporting Reportable Event/Condition to the Metro-North Railroad Department of Environmental Compliance and Services. The Department of Environmental Compliance and Services shall be responsible for reporting the event/condition to the NYSDEC and/or NRC. If the RP is unable to notify the Department of Environmental Compliance and Services, the RP shall notify the Rail Traffic Controller.

Reportable events/conditions and the associated reporting time frame are as follows:

EVENT/CONDITION	REPORTABLE TIME FRAME
Spill/Leak/Discharge of Product	2 Hours
Non-Reconciliation of Inventory Monitoring	2 Hours
Failure of Tightness Testing	2 Hours
Failure of Standpipe Testing	2 Hours
Breach of Leak Detection System	2 Hours

- UPON REPORTING A REPORTABLE EVENT/CONDITION TO THE DEPARTMENT OF ENVIRONEMNTAL COMPLIANCE AND SERVICES, THE RP SHALL DOCUMENT THE EVENT/CONDITION BY FILLING OUT THE ENCLOSED REPORTABLE EVENT/CONDITION RECORD FORM (F-3) AND FILING THE REPORT AT APPENDIX M OF VOLUME III.

F-3

REPORTABLE EVENT/CONDITION RECORD

☐ SPILL/LEAK/DISCHARGE OF PRODUCT		
TANK #:	DATE:	TIME:
AMOUNT OF PRODUCT:	PRODUCT TYPE:	
CAUSE/DESCRIPTION/RESPONSE:		

☐ NON-RECONCILIATION OF INVENTORY MONITORING		
☐ FAILURE OF TIGHTNESS TESTING		
☐ FAILURE OF STANDPIPE TESTING		
☐ BREACH OF LEAK DETECTION SYSTEM		
TANK #:	DATE:	TIME:
CONDITION/RESPONSE:		

NOTIFICATION		
☐ MNRSD	☐ YARD MASTER	☐ FIRE DEPARTMENT
DATE/TIME:	DATE/TIME:	DATE/TIME:

MAINTENANCE OF RECORDS

THE REGULATORY REFERENCES ESTABLISHING THE LENGTH OF TIME THAT DOCUMENTATION MUST BE MAINTAINED ARE A FOLLOWS:

- *Facility Registration.....6 NYCRR Part 612.2(e)*
- *SPCC Plan.....40 CFR Part 112.3(e)*
- *Product Transfer.....40 CFR Part 112.7(e)(8)*
- *Inventory Monitoring.....6 NYCRR Part 613.4(c)*
- *Tightness Testing.....6 NYCRR Part 613.5(a)(4)(iii)*
- *Standpipe Testing... ..... 6 NYCRR Part 613.4(c)*
- *Cathodic Protection Testing.....6 NYCRR Part 613.5(b)(4)*
- *Leak Detection Monitoring..... 6 NYCRR Part 613.5(b)(4)*
- *Leak Detection Inspection/Testing.....6 NYCRR Part 613.5(b)(4)*
- *Monthly Inspections.. ....6 NYCRR Part 613.6(c)(1)*
- *Ten (10) Year Inspections..... .....6 NYCRR Part 613.6(c)(1)*
- *Inspection of Secondary Containment ...40 CFR Part 112.7(e)(8)*

VOLUME III
DOCUMENTATION

TANK MANAGEMENT PLAN

A. MAINTENANCE OF DOCUMENTATION

A summary of the appendices, required documentation and the length of time that the documentation must be maintained is listed below.

APPENDIX	DOCUMENTATION	LENGTH OF TIME MAINTAINED
A	Facility (Tank) Registration	Continuous
B	SPCC Plan	Continuous
C	Oversight of Product Transfer Log	3 Year
D	Inventory Monitoring Records	5 Years
E	Tightness Testing Reports	5 Years
F	Standpipe Testing Reports	5 Years
G	Cathodic Protection System Testing Reports	1 Year
H	Leak Detection System Monitoring Log	1 Year
I	Leak Detection System Inspection/Testing Log	1 Year
J	Monthly Inspection Records	10 Years
K	Ten (10)-Year Inspection Reports	10 Years
L	Inspection of Secondary Containment Prior to the Discharge of Retained Water Log	3 Year
M	Reportable Event/Condition Records	Continuous

APPENDIX A

FACILITY (TANK) REGISTRATION

Andrew J. Spano
County Executive
Department of Health
Joshua Lipsman, M.D., M.P.H.
Commissioner

WESTCHESTER COU[illegible]ARTMENT OF HEALTH

PETROLEUM BULK STORAGE REGISTRATION CERTIFICATE

Office of Environmental h[illegible]sk Control
145 Huguenot Street - 7th Floor (914) 637-4890
New Rochelle, NY 10801

24 Hour Emergency Phone Number: (914) 637-4700

THIS CERTIFICATE IS NON-TRANSFERRABLE

Tank Number	Date Installed	Tank Type	Capacity (gallons)	Date Last Tested	Testing Due Date
13K	10/1990	Fiberglass Reinforced Plastic (FR	550		NTR
13L	03/1991	Fiberglass Coated Steel	5,000		NTR
13M	03/1991	Fiberglass Coated Steel	3,000		NTR
13N	03/1994	Fiberglass Reinforced Plastic (FR	10,000		NTR
14F	06/1992	Steel/Carbon Steel	5,000		NTR
15B	05/1989	Fiberglass Reinforced Plastic (FR	20,000		NTR
15C	06/1992	Steel/Carbon Steel	2,000		NTR
15D	06/1992	Steel/Carbon Steel	2,000		NTR
15E	06/1992	Steel/Carbon Steel	2,000		NTR
15F	06/1992	Steel/Carbon Steel	300		NTR
		Total:	**49,850**		

Owner:
Metro North Commuter Railroad
347 Madison Ave.
New York, NY 10017

Site:
North White Plains Yard
Fisher Lane

North White Plains, NY 10603

Operator (Name and Phone #):
Structures Dept.
(914) 271-0366

Emergency Contact (Name and Phone #):
Ken Mchale Asst. Dir. Env. Prot.
(914) 686-8681

As an authorized representative of the above named facility, I affirm under penalty of perjury that the information displayed on this form is correct to the best of my knowledge. Additionally, I recognize that I am responsible for assuring that this facility is in compliance with all Sections of the Westchester County Sanitary Code, Article XXV.

- The facility must be re-registered if there is a transfer of ownership;
- The Department must be notified within 30 days prior to adding, replacing, reconditioning, or permanently closing a stationary tank;
- The facility must be operated in accordance with the code for storing petroleum under the Westchester County Sanitary Code, Article XXV;
- Any new facility or substantially modified facility must comply with Article XXV of the Westchester Sanitary Code;
- THIS CERTIFICATE MUST BE POSTED ON THE PREMISES AT ALL TIMES.
- Posting must be at the tank, at the entrance of the facility, or the main office where the storage tanks are located;
- Any person with knowledge of a spill, leak or discharge must report the incident to the Westchester County Department of Health immediately at 914-637-4700 and the New York State Department of Environmental Conservation at 1-800-457-7362;

Issued By: Joshua Lipsman, M.D., M.P.H.
Petroleum Bulk Storage Number: 3-496642
Date Issued: 12/28/2000 Expiration Date: 01/02/2006
Fee Paid: $EXEMPT

Mailing Correspondence:
Joanne Reilly
Metro North Railroad
347 Madison Avenue 12th Floor
New York, NY 10017

Joanne Reilly
Signature of Authorized Representative / Owner Date

Joanne Reilly
Name of Authorized Representative / Owner (Please Print Clearly)

Title: Manager Environmental Complian[illegible]

212 340-3000

Metro-North Railroad

(sent Certified Mail 12/18/00
Michele called 12/28/00 ABout Exempt Fees ... (we are exempt...)

December 18, 2000

Westchester County Department of Health
Office of Environmental Health Risk Control
Petroleum Bulk Storage Registration
145 Huguenot Street 7th Floor
New Rochelle, NY 10801

Subject: PBS Application for Registration Renewal, Updates and Additions of tanks for the North White Plains Yard

To Whom It May Concern:

Enclosed are the Petroleum Bulk Storage (PBS) applications for registration renewals, updates, and additions for our North White Plains facility located at Fisher Lane within Westchester County.

Also, enclosed for your information is a letter which explains Metro-North Railroad, as part of the New York State Metropolitan Transportation Authority, is exemption from fees, taxes and assessments, both local and state.

If you require additional information or have any questions, please feel free to contact me at 212 340-3342.

Very truly yours,

Joanne Reilly

Joanne Reilly
Manager of Environmental Compliance and Services

Enc.

CC:
K. Mc Hale – MNR
K. Timko – MNR
T. Roszak – Day
T. Hampton - Day
Tank File

H:\Legal\Reilly\TankMangPlan\Reg.Renewal\RenewtankLtr-NWP.doc

Westchester County

PETROLEUM BULK STORAGE APPLICATION

Form A

Pursuant to the Petroleum Bulk Storage Law,
Article XXV of the Westchester County Sanitary Code

(Continued on Reverse Side-Please Be Sure to Complete Section B

Please Type or Print Clearly and Complete All Items

SECTION A – See Instructions on Cover Sheet

PBS NUMBER: 3-496642

Indicate Other Existing DEC Numbers, if any, for this Facility:

CBS Number: NA

SPDES Number: NA

TRANSACTION TYPE (Check all that apply)
NOTE: Transaction Types 1, 2 and 5 require a fee.

1. ☒ Initial/New Facility (15-A)
2. ☐ Change of Ownership
3. ☐ Substantial Tank Modification
4. ☒ Information Correction
5. ☒ Renewal

Geographical Locator for this Facility: (If known)

LATITUDE: 41 03 00 DEG MIN SEC

LONGITUDE: 73 46 30 DEG MIN SEC

FACILITY

NAME: North White Plains

LOCATION (Not P.O. Boxes): Metro-North Railroad

LOCATION (Continued): Fisher Lane

CITY/TOWN/VILLAGE: North White Plains | STATE: NY | ZIP CODE: 10603

COUNTY: Westchester | TOWNSHIP OR CITY: North Castle

NAME OF OPERATOR AT FACILITY: Structures Department | FACILITY TELEPHONE NUMBER: (914) 271-0366

EMERGENCY CONTACT NAME: Ken McHale | EMERGENCY CONTACT PHONE NO.: (914) 686-8681

TYPE OF PETROLEUM FACILITY:
(Check all that apply)

A. ☐ Storage Terminal/Petroleum Distributor
B. ☐ Retail Gasoline Sales
C. ☐ Other Retail Sales
D. ☐ Manufacturing
E. ☐ Utility
F. ☐ Trucking/Transportation
G. ☐ Apartment Building
H. ☐ School
I. ☐ Farm
J. ☐ Private Residence
K. ☐ Airline (Air Taxi)
L. ☒ Other (Specify)

Railroad Maintenance Yard

OWNER

NAME: Metro North Railroad

ADDRESS (Street and/or P.O. Box): 347 Madison Avenue

CITY: New York | STATE: NY | ZIP CODE: 10017

FEDERAL TAX ID NO.: NA | OWNER TELEPHONE NUMBER: ( )

TYPE OF OWNER (Check only one)
1 ☐ Private Resident 2 ☒ State Government 3 ☐ Local Government
4 ☐ Federal Government 5 ☐ Corporate/Commercial

I hereby certify under penalty of perjury that the information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

NAME OF OWNER OR AUTHORIZED REPRESENTATIVE: Joanne Reilly | AMOUNT ENCLOSED: $ Exempt

TITLE: Manager Environmental Compliance & Service

SIGNATURE | DATE

MAILING CORRESPONDENCE

ATTENTION: Joanne Reilly

NAME OF COMPANY: Metro-North Railroad

ADDRESS: 347 Madison Avenue, 12th Floor

ADDRESS: New York, New York 10017

CITY/STATE/ZIP CODE: North White Plains, New York 10603-2217

TELEPHONE NUMBER: (212) 340-3342

OFFICIAL USE ONLY

Page ____ of ____

Date Received: ____/____/____

Date Processed: ____/____/____

Amount Received $ ____

Reviewed By: ____

SECTION B—See Instructions on Cover Sheet

Action	Tank Number	Tank Location	Status	Installation or Permanent Closure Date (MO)	(YR)	Capacity (Gallons)	Product Stored	Tank Internal Prot.	Tank Type	Tank External Protection	Piping Location	Piping Type	Piping Internal Prot.	Piping External Protection	Secondary Containment	Leak Detection	Spill/ Overfill Prevention	Dispenser	Last Test Date (underground Tanks) (MO)	(YR)
5	13-K	4	1	10	90	550	3	3	5	4	2	4		9**	2	1	2	2	09	00
	13-L	4	1	03	91	5,000	2	0	4	4	2	3	3	4	2	1	3/4	1		
	13-M	4	1	03	91	3,000	6	0	4	4	2	3	3	4	2	1	3/4	1		
	13-N	4	1	03	94	10,000	3	3	5	4	2	3	3	4	2	3	3/4	2		
	14-F	2	1	06	92	5,000	6	0	1	1	1	1	0	0	7	0	4	2		
4	15-B	4	1	05	89	20,000	3	3	5	4	2	3	3	4	2	1	6	2		
	15-C	1	1	06	92	2,000	C	0	1	1	1	1	0	0	5	0	4	3		
	15-D	1	1	06	92	2,000	9*	0	1	1	1	1	0	0	5	0	4	2		
	15-E	1	1	06	92	2,000	A	0	1	1	1	1	0	0	5	0	4	2		
	15-F	2	1	06	92	300	6	0	1	1	1	1	0	1	5	0	4	2		
2	15-A	2	1	00	00	55	6	0	1	1	1	1	0	1	5	0	0	3		
	*Hydraulic Oil																			
	**Plastic Hose																			

KEY FOR SECTION B

ACTION
1 Initial Listing
2 Add Tank
3 Close/Remove Tank
4 Information Correction
5 Recondition/Repair/ Reline Tank

TANK LOCATION
1 Aboveground
2 Aboveground on saddles legs, stilts, rack, or cradle
3 Aboveground: 10% or more below ground
4 Underground
5 Underground, vaulted, with access

STATUS
1 In-service
2 Temporarily out-of-service
3 Closed—Removed
4 Closed—In Place
5 Tank Converted to Non-Regulated Use

PRODUCT STORED
0 Empty
1 Leaded Gasoline
2 Unleaded Gasoline
3 Nos. 1, 2, or 4 Fuel Oil
4 Nos. 5 or 6 Fuel Oil
5 Kerosene
6 Diesel
A Lube Oil
B Used Oil (fuel)
C Used Oil
9 Other*

TANK TYPE
1 Steel/Carbon Steel
2 Stainless Steel Alloy
3 Concrete
4 Fiberglass Coated Steel
5 Fiberglass Reinforced Plastic (FRP)
6 Equivalent Technology
9 Other*

PIPING TYPE
0 None
1 Steel/Iron
2 Galvanized Steel
3 Fiberglass (FRP)
4 Copper
9 Other*

INTERNAL PROTECTION: Tank/Piping
0 None
1 Epoxy Liner
2 Rubber Liner
3 Fiberglass Liner (FRP)
4 Glass Liner
9 Other*

EXTERNAL PROTECTION: Tank/Piping
0 None
1 Painted/Asphalt Coating
2 Sacrificial Anode
3 Impressed Current
4 Fiberglass
5 Jacketed
6 Wrapped (Piping)
9 Other*

PIPING LOCATION
0 None
1 Aboveground
2 Underground
3 Aboveground/Underground Combination

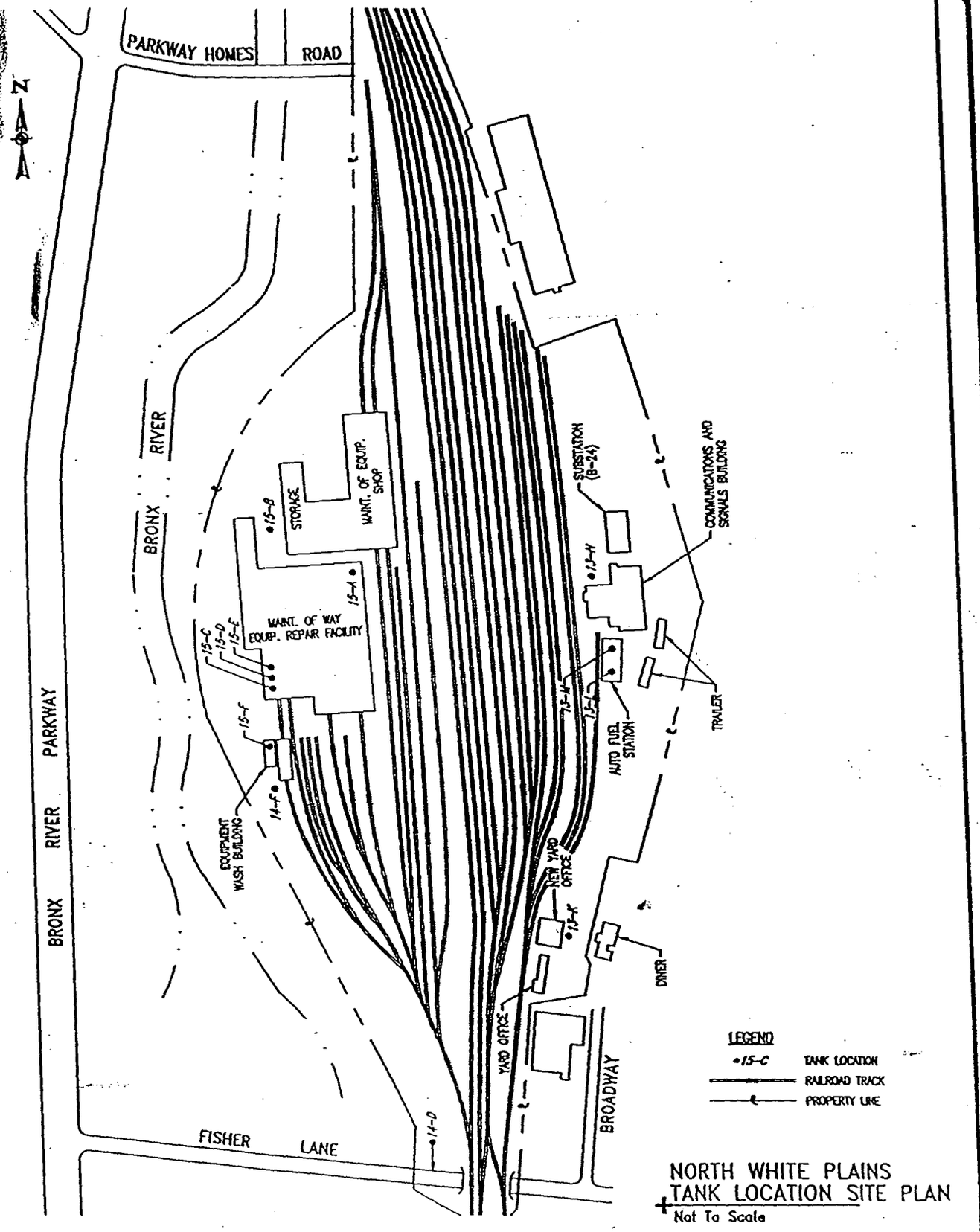
SECONDARY CONTAINMENT
0 None
1 Vault
2 Double-Walled Tank
3 Excavation Liner
4 Cut-off Walls
5 Impervious Underlayment
6 Earthen Dike
7 Prefabricated Steel Dike
8 Concrete Dike
A Synthetic Liner
B Natural Liner
9 Other*

LEAK DETECTION
0 None
1 Interstitial Monitoring
2 Vapor Well
3 Groundwater Well
4 In-tank System
5 Concrete Pad w/channels
6 Double Bottom
9 Other*

SPILL/OVERFILL PREVENTION
0 None
1 Float Vent Valve
2 High Level Alarm
3 Automatic Shut-off
4 Product Level Gauge
5 Catch Basin
6 Vent Whistle
9 Other*

DISPENSER
1 Submersible
2 Suction
3 Gravity

* If Other, please list on separate sheet including the Tank Number.



NORTH WHITE PLAINS
TANK LOCATION SITE PLAN
Not To Scale

DATE 12/13/2000 DRAWN BY Tww SCALE No Scale	**day** DAY ENGINEERING, P.C. ENVIRONMENTAL ENGINEERING CONSULTANTS ROCHESTER, NEW YORK 14623-2700	PROJECT TITLE METRO-NORTH RAILROAD NORTH WHITE PLAINS YARD NORTH WHITE PLAINS, NEW YORK TANK MANAGEMENT PLAN DRAWING TITLE Tank Location Site Plan	PROJECT NO. 00-2939I (33) FIGURE 1 SHEET 1 OF 1

Ref3:
Filename: \Metro\NorthWhitePlains\TankLocation
Dec 13 10:10 2000
Ref2:

E

APPENDIX E

SPCC PLAN

SPILL PREVENTION
CONTROL & COUNTERMEASURE PLAN

Metro-North Railroad - North White Plains Yard
North White Plains, New York

Prepared by: Day Engineering, P.C.
2144 Brighton-Henrietta Townline Road
Rochester, New York 14623

Date: December, 1998

Project #: 95-2631I

109638(9236)-3.3.2.5

I. SPCC PLAN CERTIFICATION

I hereby certify that I have visited and examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with the requirements of 40 CFR, Part 112 and with good engineering practices.

(Seal)

Clark K. Price, P.E.
Printed Name of Registered Professional Engineer

Clark K. Price
Signature of Registered Professional Engineer

Date Dec 31, 1998 Registration No. 68446 State New York

III. SPCC PLAN IMPLEMENTATION REQUIREMENTS

This SPCC Plan is stamped by the Professional Engineer identified on page 1 of this Plan with the explicit understanding that this SPCC Plan will be put into effect immediately, and that the implementation requirements listed below will be completed within six (6) months of the signature date listed on page 1.

1) Implement a formal inspection program at North White Plains Yard for tank systems, secondary containment areas, and petroleum unloading operations. SOPs 2, 9 and 11 found within the Tank Management Plan - North White Plains Yard (TMP-NWPY) provide the inspection forms that will be used by MNR personnel in the future.

2) Implement a program to ensure that any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status, and that starter controls on all oil pumps in non-operating or standby status are locked in the off position.

3) Implement a SPCC training program for those personnel responsible for using, transporting, and handling of oil in the facility. Existing and new employees must review the facility SPCC Plan, review the relevant NYS and Federal laws which pertain to oil pollution, and learn the proper use of the oil spill response equipment. Annual refresher training must be held for affected personnel. Documentation on the training conducted must be retained by MNR for at least three years.

4) Post signs to warn vehicles of the presence of aboveground piping. The warning signs must be posted near aboveground piping which is located near vehicle roadways, or access pathways.

5) As part of the loading and unloading program, post warning signs to help prevent vehicular departure before disconnect of transfer lines.

6) Obtain and maintain the oil spill response equipment listed in Attachment #3 of this plan.

After the implementation requirements have been implemented, the facility must be reinspected as necessary, and the SPCC Plan updated and revised accordingly.

IV. FACILITY INFORMATION

1. **Name of facility:** Metro-North White Plains Yard

2. **Address of facility:** One Fisher Lane
North White Plains, New York 10603

3. **Type of facility:** Railroad yard, conducting maintenance of way, and maintenance of equipment and rail cars.

4. **Name and address of owner/operator:** (if different from above)

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

5. **North White Plains Yard Spill Prevention Coordinator Responsibilities**

The North White Plains Yard Spill Prevention Coordinator has been designated in Attachment 1 to this plan and shall:

- be familiar with this plan, the Tank Management Plan - North White Plains Yard (TMP-NWPY), the facility layout and all facility operations that involve oil storage, transport, loading/unloading, or use;
- be familiar with spill prevention and response techniques, and apply those preventive measures and response procedures to any discharge of oil;
- be knowledgeable about proper spill reporting procedures (see Section V.6.A and Attachment #2);
- ensure that facility employees and response personnel are trained in the contents of this plan and the appropriate techniques for spill prevention and response (see Sections V.5.A and B);
- ensure that the necessary tank/equipment inspections are completed (see Sections V.3.F and V.9.E).

V. FACILITY SPCC PLAN PROVISIONS

Note, this SPCC Plan (PLAN) follows a format acceptable to State and federal regulatory agencies. It poses questions from the applicable regulations that may not be applicable to the specific facility. Where appropriate, this Plan clearly states that the regulatory requirement does not apply to this facility.

1. **Facility experienced a reportable oil spill event during the prior 12 months.** (If YES, complete Attachment #1) No

2. **Description of Facility Operation:**

Metro-North Railroad services and fuels commuter trains at this yard. Automobiles/trucks are also fueled at this yard. In addition, the facility coordinates track maintenance and conducts equipment maintenance at this yard.

To support and conduct these activities, Metro-North currently has a total of ten bulk storage tanks at the facility, storing various types of petroleum products. Five of the tanks are located aboveground, and five are located belowground. A summary of tank information is provided in Table #1 which is located at the end of this Plan, and in the TMP-NWPY. The TMP-NWPY provides detailed information on each tank and the steps required to comply with the applicable regulatory requirements. The locations of the tanks are shown on Drawing IC1.1 of this SPCC Plan. This SPCC Plan is located in Appendix B of Volume 3 of the TMP-NWPY.

3. **Tank Information, Inspection Data, and Potential Spills - Prediction & Control**

A. *Amount and Type of Oil Stored:*

See Table #1 in this SPCC Plan for a list of the amount and type of oil stored in each tank.

B. *Potential Type of Failure:*

For aboveground tanks, potential types of failure are ruptured/leaking tanks, leaking secondary containment (if so equipped), defective/leaking valving, leaking aboveground pipelines, and a spill of the tanker at the tank loading/unloading area.

For belowground tanks, potential types of failure are ruptured/leaking tanks, leaking secondary containment (if so equipped), defective/leaking valving, leaking fillports and buried pipelines, and a spill of the tanker at the tanker

loading/unloading area.

C. *Maximum Potential Spill Quantity/Rate:*

The maximum potential spill quantity is generally dictated either by the tank size, or by the refueling tanker size. The rate of spillage is highly dependent on the type of spill. For example, a cracked seam in a tank or fractured joint in a pipeline could result in a slow leak/spill. A ruptured tank hull or pressurized pipeline or fueling line would result in a much faster leak/spill. A tipped-over refueling tanker could potentially result in the loss of several thousands of gallons of product within several minutes.

D. *Direction of Flow:*

This item is more critical for aboveground tanks, or belowground tanks equipped with pressurized pumps. The topography at North White Plains is essentially flat, and a spill from a tank would typically pool around the tank or dispensing device. In the event of a spill, the petroleum product would be controlled with absorbent pads and booms.

E. *Secondary Containment:*

Each of the aboveground tanks at North White Plains are equipped with secondary containment.

F. *Tank Inspection Methods, Procedures, and Recordkeeping:*

Currently, MNR does not have a formal tank system inspection program in place. However, Standard Operating Procedures (SOPs) 2, 9 and 11 found within the TMP-NWPY provide the inspection logs which will be used by MNR personnel for the oil storage areas in the facility. The tank inspection procedures that will be implemented at the North White Plains Yard include the following:

<u>Aboveground Petroleum Storage and Piping Systems</u>

1. Monthly Inspection

Each aboveground petroleum tank and appurtenant equipment (i.e., piping, valves, pumps, secondary containment systems, etc.) will be visually inspected once per month. This inspection will include:

a. an inspection of exterior surfaces for leaks and maintenance deficiencies.

b. an identification of cracks, areas of wear, corrosion and thinning, excessive settlement of structures, separation or swelling of tank insulation (if so equipped), malfunctioning equipment, and structural and foundation weaknesses.

c. an inspection of leak detection systems, cathodic protection monitoring equipment or other monitoring or warning systems which may be present at the facility.

An inspection form will be completed by the Responsible Party (RP) as defined in the TMP-NWPY, and a list of deficient items will be provided to the North White Plains Yard Spill Prevention Coordinator and to the Metro-North Maintenance Department. Copies of the inspection forms for aboveground tanks, for valves, pumps, and piping, and for secondary containment systems will be kept in the TMP-NWPY. The North White Plains Yard Spill Prevention Coordinator will retain these inspection reports for a period of at least ten years. Whenever possible, the deficient items will be corrected prior to the next inspection. If complete correction is not possible within that time-frame, a short report indicating the problem and the estimated correction time will be developed by the North White Plains Yard Spill Prevention Coordinator.

Underground Petroleum Storage and Piping Systems

The regulatory requirements for underground storage tanks (USTs) and piping are provided in the federal UST regulations and in the New York State PBS regulations. The requirements are extensive and dependent upon the age, product stored, and size of the tank. According to MNR, this facility complies with these requirements.

Since underground tanks and piping cannot be visually inspected, regulation and normal industry practice requires that the tank and piping be constructed to certain standards and periodically tested to verify the system's integrity. The construction, corrosion protection, spill and overfill protection, leak detection and testing requirements for each of the underground tanks at North White Plains are described in the TMP-NWPY. The TMP-NWPY will be updated by Metro-North annually to ensure that each underground tank and piping system is in compliance with the regulatory requirements.

Compliance with the TMP-NWPY will ensure adequate preventive maintenance occurs for underground tank and piping systems.

G. *Internal Heating Coil Leakage Control:*

There are no internal coil tank heating systems identified at North White Plains. Therefore, this item is not applicable.

4. Security

A. *Are facilities which handle, process or store oil fenced?*

No, Refer to 4.E

B. *Are entrance gates locked and/or guarded when the plant is unattended or not in production?*

No, Refer to 4.E

C. *Are any valves which permit direct outward flow of a tank's contents locked closed when in non-operating or standby status?*

No, Refer to 4.E

D. *Are starter controls on all oil pumps in non-operating or standby status locked in the off position, or located at site accessible only to authorized personnel?*

No, Refer to 4.E

E. *Discussion of items A through D as appropriate:*

There is no fence around the facility, but the facility is located in a relatively remote location, and typically does not have a problem with unauthorized personnel being on-site. Most of the shop buildings are restricted access areas, and not open to the general public. In general, facility security is adequate to protect against the potential for vandalism which could result in reportable oil discharges to navigable waters. In addition, routine security patrols of North White Plains are conducted at random intervals throughout each day.

As a precaution, MNR personnel will implement as part of the SPCC Plan, a system to ensure that any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status, and that starter controls on all oil pumps in non-operating or standby status are locked in the off position.

F. *Discussion of the facility lighting:*

The lighting in most areas of the North White Plains is adequate. Adequate lighting is required in order for MNR personnel, and others (police, visitors, etc.) to easily observe spills both inside and outside of the facility, and at the tanker loading/unloading operations.

5. Personnel, Training, and Spill Prevention Procedures:

A. *Are personnel properly instructed in the operation and maintenance of equipment to prevent oil discharges, and applicable pollution control laws, rules, and regulations?*

MNR currently does not have a formal SPCC training program in place for those personnel responsible for using, transporting, and handling of oil in the facility. MNR plans to have a training program in effect in the near future. Existing and new employees will be required to review the facility SPCC Plan, to review the relevant NYS and Federal laws which pertain to oil pollution, and to learn the proper use of the oil spill response equipment, as required. New employees who are responsible for loading or inspecting oil storage tanks are required to be trained within one month of assuming their new responsibilities. Annual refresher training will be held for affected personnel.

The training will include the following items:

1) A discussion of the proper operation and maintenance of the oil storage tanks, transfer equipment, and loading/unloading facilities.

2) A review of the inspection requirements for each area covered by the Plan.

3) A review of the spill reporting procedures, and a discussion of the spill reporting forms.

4) A review of the applicable pollution control laws, rules and regulations to include the penalty provisions of each.

5) A discussion of the appropriate initial spill response actions and the appropriate methods to use the available spill response equipment available within each area.

The training sessions will be documented and records of the training will be kept by the North White Plains Yard Spill Prevention Coordinator for a period of at least three years.

B. *Are scheduled spill prevention briefings for the operating personnel conducted frequently enough to assure adequate understanding of the SPCC Plan?*

See Section 5.A

6. **Emergency Notification Procedures and Spill Contingency Plan:**

A. *Does a portion of the SPCC Plan describe the procedures to be used in emergency circumstances?*

Attachment #2 to this SPCC Plan provides the emergency procedures which will be used by MNR personnel in the event of an oil release. Attachments #1 and SOP-12 from the TMP-NWPY provide the oil spill report forms which will be utilized by MNR to document any spill events which occur at the North White Plains Yard. Copies of the oil spill report forms will be retained by MNR for at least three years.

7. **Facility Drainage**

A. *Drainage from oil containment areas is controlled as follows (include operating description of valves, pumps, ejectors, etc.). (Note: Flapper-type valves should not be used):*

This item applies primarily to aboveground tanks equipped with secondary containment and located outdoors. The secondary containment areas are drained by sump pumps, or valves. Prior to the drainage of secondary containment systems, the secondary containment inspection form provided in SOP-11 of the TMP-NWPY will be completed. The procedures outlined in that SOP will be followed.

B. *Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):*

This item is more critical for aboveground tanks without secondary containment, or belowground tanks equipped with pressurized pumps. The topography at North White Plains is essentially flat, and a spill from a tank would typically pool around the tank or dispensing device. In the event of a spill, the petroleum product would be controlled with absorbent pads and booms.

C. *The procedure for supervising the drainage of rain water from oil containment area into a storm drain or an open watercourse is as follows (include description of (a) inspection for pollutants, and (b) method of valving security).*

Presently, MNR does not have a program in place to supervise the drainage of rain water from the secondary containment areas of the aboveground tanks. As part of the SPCC Plan, a program will be implemented that provides for and documents valving security, an inspection of the rain water, the removal of oil products and/or sheen through the use of sorbent pads and booms, and the subsequent discharge of the rain water. The inspection checklist for this program is included as part of SOP-11 in the TMP-NWPY.

D. *Disposal facilities for plant effluents discharged into navigable waters are observed frequently for indication of possible upsets which may cause an oil spill event:*

Plant effluents are discharged to an off-site POTW.

8. Facility Transfer Operations, Pumping, and In-process

A. *Is corrosion protection provided for buried pipelines?*

Since underground tanks and piping cannot be visually inspected, regulation and normal industry practice requires that the tank and piping be constructed to certain standards and periodically tested to verify the system's integrity. The construction, corrosion protection, spill and overfill protection, leak detection and testing requirements for each of the underground tanks at North White Plains are described in the TMP-NWPY. The TMP-NWPY will be updated by Metro-North annually to ensure that each underground tank and piping system is in compliance with the regulatory requirements.

Compliance with the TMP-NWPY will ensure adequate preventive maintenance occurs for underground tank and piping systems.

B. *Are pipeline terminal connections capped or blank-flanged, and marked if the pipeline is not in service or is on standby service for extended periods?*

Tanks at North White Plains are currently in service, and will remain in service until decommission. There are no tanks at North White Plains on extended stand-by or not in service. Therefore, this section does not apply to North White Plains.

C. *Are pipe supports designed to minimize abrasion and corrosion, and to allow for expansion and contraction?*

Existing piping will be inspected for abrasion and corrosion as outlined in Section D below. Any installation of new piping at North White Plains will account for expansion, contraction, abrasion, and will ensure adequate corrosion control.

D. *Have procedures have been developed to ensure that aboveground valves and pipelines (including flange joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces) are regularly checked?*

Each aboveground petroleum tank and appurtenant equipment (i.e., piping, valves, pumps, etc.) will be visually inspected once per month. This inspection log and procedure is included as part of SOP-12 from the TMP-NWPY. This SOP will require:

a. an inspection of exterior surfaces for leaks and maintenance deficiencies.

b. an identification of cracks, areas of wear, corrosion and thinning, poor maintenance and operating practices, excessive settlement of structures, separation or swelling of tank insulation (if so equipped), malfunctioning equipment, and structural and foundation weaknesses.

c. an inspection and monitoring of leak detection systems, cathodic protection monitoring equipment or other monitoring or warning systems which may be present at the facility.

E. *Have procedures been developed to warn vehicles entering the facility to avoid damaging aboveground piping?*

There is currently no formal system in place to warn vehicles of the presence of aboveground piping. However, as part of the implementation of the SPCC Plan, warning signs will be posted near the aboveground piping which is located near vehicle roadways, or access pathways.

9. Facility Tank Car & Tank Truck Loading/Unloading Areas

Tank car and tank truck loading/unloading occurs at the facility. Consequently, sections A through E below have been completed.

A. *Do loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation. (i.e. agents from both the supplier and the receiver of the oil products attend and observe the unloading procedures)?*

When MNR personnel cannot be present during a product delivery, the contractor delivering fuel oil is required to comply with the inspection requirements provided for in SOP-2 of the TMP-NWPY.

B. *Does the unloading area have a quick drainage system?*

In lieu of a containment system associated with unloading/loading operation, MNR will utilize a comprehensive inspection program, in conjunction with spill response equipment to contain the petroleum product in the event of an actual spill. Refer to item 9.E below.

C. *Does the containment system hold the maximum capacity of any single compartment of a tank truck loaded/unloaded at the facility?*

This item is not applicable.

D. *Are interlocked warning lights, a physical barrier system, or warning signs provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines?*

As part of the loading and unloading program, MNR will place warning signs to help prevent vehicular departure before transfer lines are disconnected.

E. *Are drains and outlets on tank trucks and tank cars checked for leakage before loading/unloading or departure?*

Metro-North will complete an inspection log as part of each loading and/or unloading operation. This inspection log and procedure can be found in SOP-2 of the TMP-NWPY.

SPCC PLAN ATTACHMENT #1

I. Metro-North Railroad Management Approval

This SPCC Plan will be implemented as herein described.

Signature _____

Name Nelson Rodrigues M of E

Title Facility Supervisor

Signature _____

Name Lova Borisjuk M of W

Title Facility Supervisor

Signature _____

Name Anthony Forcina C&S

Title Facility Supervisor

II. Designated person accountable for oil spill prevention at facility (New Haven Yard Spill Prevention Coordinator):

Name Nelson Rodrigues

Title Facility Supervisor M of E

Name Lova Borisjuk M of W

Title Facility Supervisor

Name Anthony Forcina C&S

Title Facility Supervisor

SPCC PLAN, ATTACHMENT #2

SPILL HISTORY

(Complete this form for any reportable spill(s) which has (have) occurred at this facility during the preceding twelve months. Use extra sheets as necessary. The US EPA must be notified if the facility experiences two reportable spills* of any size within a 12 month period or any one spill larger than 1,000 gallons.)

1. Date _____ Volume _____

Cause: _____

_____

_____

_____

Corrective action taken: _____

_____

_____

Plans for preventing recurrence: _____

_____

_____

2. Date _____ Volume _____

Cause: _____

_____

_____

_____

Corrective action taken: _____

_____

_____

Plans for preventing recurrence: _____

_____

_____

* A reportable spill is defined in 40 CFR Part 110 as a release of oil to surface waters sufficient to cause a visible sheen or to deposit an oily sludge or emulsion on the shoreline.

SPCC PLAN, ATTACHMENT #2

NORTH WHITE PLAINS YARD, 2000

SPILL HISTORY

Complete this form for any reportable spill(s), which has (have) occurred at this facility during the preceding twelve months. Use extra sheets as necessary. The US EPA must be notified if the facility experiences two reportable spills of any size within a 12 month period or any one spill larger than 1,000 gallons.)

- A reportable spill is defined in 40 CFR Part 110 as a release of oil to "navigable waters" sufficient to cause a visible sheen or to deposit an oily sludge or emulsion on the shoreline.

See attachment

NYSDEC SPILL REPORT FORM

DEC REGION# 3 (New Paltz) SPILL NUMBER 9914108

SPILL NAME: METRO NORTH DEC LEAD: O'DEE

CALLER'S NAME: NOTIFIER'S NAME:

CALLER'S AGENCY: NOTIFIER'S AGENCY:

CALLER'S PHONE: EXT. NOTIFIER'S PHONE: EXT.

SPILL DATE: 03/14/2000 TIME: 15:00

CALL RECEIVED DATE: 03/14/2000 TIME: 15:35 RECEIVED BY CID #: 282

	Material Spilled	Mat. Class	Am't Spilled	Units	Am't Recovered
1)	#2 FUEL OIL	(Pet)-Haz-Other-Unk.	0	(Gal) Lbs	0
2)		Pet-Haz-Other-Unk.		Gal - Lbs	
3)		Pet-Haz-Other-Unk.		Gal - Lbs	
4)		Pet-Haz-Other-Unk.		Gal - Lbs	

SPILL LOCATION

PLACE: METRO NORTH

STREET: FISHER LANE

T/C/V: NORTH WHITE PLAINS CO: WESTCHESTER

CONTACT: TOM ROSZAK

PHONE: (716) 292-1090 EXT.

POTENTIAL SPILLER

NAME: METRO NORTH

STREET: FISHER LANE

CITY: NORTH WHITE PLAINS

STATE: NY ZIP:

CONTACT: TOM ROSZAK

PHONE: (716) 292-1090 EXT.

SPILL CAUSE

Human Error	(Tank Test Failure*)	Tank Failure
affic Accident	Housekeeping	Tank Overfill
Equipment Failure	Deliberate	Other
talism	Abandoned Drums	Unknown

SPILL SOURCE

Gas Station	Private Dwelling	Non-Maj Facility
Passenger Vehicle	Vessel	(Comm/Indust)
Comm. Vehicle	Railroad Car	Non-Comm/Instit
Tank Truck	Major Facility	Unknown

RESOURCE AFFECTED

(On Land)	Groundwater	Air
In Sewer	Surface Water**	

**WATERBODY:

SPILL REPORTED BY

Responsible Party	(Tank Tester)	Local Agency
Affected Persons	DEC	Federal Gov't
Police Department	Citizen	Other
Fire Department	Health Dept.	

CALLER REMARKS: TANK FAILED THE TEST CHECKING THE LINES AND WILL CALL BACK FOR RETEST.

*PBS Number	Tank Number	Tank Size	Test Method	Leak Rate
	1	550	HORNER EZ CHECK	0.00

PRIMARY CONTACT CALLED DATE: TIME: hrs. REACHED DATE: TIME: hrs.

SECONDARY CONT. CALLED DATE: TIME: hrs. FAXED BY CID#:

PIN #	T & A	Cost Center	ISR to Central Office
Cleanup Ceased	Meets St'ds YES	Last Inspection	Penalty NO
P-CUI	ENF-INIT	INVES-COM	CAP
T Trust Eligible NO	Site: A B C (D) E	Resp. Party 1 2 (3) 4 5 6	Reg Close Date 10/16/2000

Created on 03/14/2000 Last Updated on 10/23/2000 Is Updated? YES EDO DATA INPUT [ ]

Date Printed: 05/04/2001

PrintFor 3/30/1999

Spill Number: 9914108 Spill Name: METRO NORTH Printed on: 05/04/2001

DEC REMARKS

10/16/2000 TANK PASSED THIRD RETEST AFTER MANWAY WAS REPLACED. WCHD SHOULD HAVE BEEN LEAD BY REPORT WAS HANDLED BY DEC AFTER TANK FAILED SECOND RETEST. NFA

SPCC PLAN, ATTACHMENT #2

NORTH WHITE PLAINS YARD, 1999

SPILL HISTORY

Complete this form for any reportable spill(s), which has (have) occurred at this facility during the preceding twelve months. Use extra sheets as necessary. The US EPA must be notified if the facility experiences two reportable spills of any size within a 12 month period or any one spill larger than 1,000 gallons.)

- A reportable spill is defined in 40 CFR Part 110 as a release of oil to "navigable waters" sufficient to cause a visible sheen or to deposit an oily sludge or emulsion on the shoreline.

See attachment

NYSDEC SPILL REPORT FORM

DEC REGION# 3 (New Paltz) SPILL NUMBER 9911254

SPILL NAME: METRO NORTH EQUIPMENT FAC DEC LEAD: O'DEE

CALLER'S NAME: NOTIFIER'S NAME:

CALLER'S AGENCY: NOTIFIER'S AGENCY:

CALLER'S PHONE: EXT. NOTIFIER'S PHONE: EXT.

SPILL DATE: 12/23/1999 TIME: 16:30

CALL RECEIVED DATE: 12/23/1999 TIME: 21:05 RECEIVED BY CID #: 246

	Material Spilled	Mat. Class	Am't Spilled	Units	Am't Recovered
1)	#2 FUEL OIL	(Pet)-Haz-Other-Unk.	20	(Gal) - Lbs	Unknown
2)		Pet-Haz-Other-Unk.		Gal - Lbs	
3)		Pet-Haz-Other-Unk.		Gal - Lbs	
4)		Pet-Haz-Other-Unk.		Gal - Lbs	

SPILL LOCATION

PLACE: METRO NORTH EQUIPMENT FAC

STREET: PARKWAY-HOMES RD

T/C/V: NORTH WHITE PLAINES CO: WESTCHESTER

CONTACT: KEN MCHELE

PHONE: (800) 840-7510 EXT.

POTENTIAL SPILLER

NAME: METRO NORTH RR

STREET: 340 MADISON AVE

CITY: NEW YORK

STATE: NY ZIP: 10017-

CONTACT: KEN MCHELE

PHONE: (800) 840-7510 EXT.

SPILL CAUSE

Human Error	Tank Test Failure*	Tank Failure
affic Accident	Housekeeping	(Tank Overfill)
Equipment Failure	Deliberate	Other
dalism	Abandoned Drums	Unknown

SPILL SOURCE

Gas Station	Private Dwelling	Non-Maj Facility
Passenger Vehicle	Vessel	(Comm/Indust)
Comm. Vehicle	Railroad Car	Non-Comm/Instit
Tank Truck	Major Facility	Unknown

RESOURCE AFFECTED

On Land	Groundwater	Air
(In Sewer)	Surface Water**	

**WATERBODY:

SPILL REPORTED BY

Responsible Party	Tank Tester	Local Agency
Affected Persons	DEC	Federal Gov't
Police Department	Citizen	(Other)
Fire Department	Health Dept.	

CALLER REMARKS: SPILL CAUSED BY VENT PIPE OVERFILL - MATERIAL DEPOSITED INTO CATCH BASIN OR PAVEMENT AND ENTERED SEWER SYSTEM. BOOMS IN PLACE TO KEEP MATERIAL FROM ENTERING RIVER PRODUCT VACUUMED UP BY CONTRACTOR - NO SHEEN ON RIVER

*PBS Number	Tank Number	Tank Size	Test Method	Leak Rate

PRIMARY CONTACT CALLED DATE: TIME: hrs. REACHED DATE: TIME: hrs.

SECONDARY CONT. CALLED DATE: TIME: hrs. FAXED BY CID#:

PIN #	T & A	Cost Center	ISR to Central Office
Cleanup Ceased	Meets St'ds YES	Last Inspection	Penalty NO
P-CUI	ENF-INIT	INVES-COM	CAP
T Trust Eligible NO	Site: (A) B C D E	Resp. Party 1 2 (3) 4 5 6	Reg Close Date 12/24/1999

Created on 12/23/1999 Last Updated on 01/04/2000 Is Updated? NO EDO DATA INPUT [ ]

Date Printed: 05/04/2001

PrintFor 3/30/1999

DEC REMARKS

12/24/99 DUPLICATE REPORT. SPILL HAD ALREADY BEEN CALLED IN AS SPILL NUMBER 99-11233. T. GHIOSAY & J. O'DEE (DEC) ALREADY ON SITE. ESTIMATE SPILL AS MINIMUM 30-40 GALLONS. CONTRARY TO CALLER COMMENTS, BOTH SHEEN AND FREE PRODUCT DID DISCHARGE TO BRONX RIVER. NOTIFIER WAS AWARE OF BOTH PRIOR SPILL NUMBER & SHEEN ON RIVER PRIOR TO CALLING IN SECOND SPILL. SEE SPILL NUMBER 99-11233 FOR UPDATES. NFA

ATTACHMENT #3

SPILL CONTINGENCY PLAN AND COMMITMENT OF MANPOWER, EQUIPMENT AND MATERIALS

The following written commitment of manpower, equipment and materials will be implemented in the event of oil discharge at North White Plains.

1) Notify the MNR North White Plains Yard Spill Prevention Coordinator.

2) The MNR North White Plains Yard Spill Prevention Coordinator or MNR management must contact the emergency response numbers.

3) If necessary, contact an oil spill response contractor, to provide assistance in completing the cleanup. This decision will be made by the MNR Spill Prevention Coordinator or by MNR management.

Emergency Response Numbers:

North White Plains Yard Spill Prevention Coordinator:
During First Shift: Nelson Rodrigues M of E ..... (914) 686-8706
Lova Borisjuk M of W ..... (914) 686-8467
Anthony Forcina C& S ..... (914) 686-8520

During all other times: Chief Dispatcher ..... (212) 340-2050

Conn. DEP Spill Notification ..... (760) 424-3338

North White Plains Fire Department/HazMat Team 911

National Response Center ..... (800) 424-8802

Oil Spill Cleanup Contractors: Fleet Environmental ..... (203) 744-3477

4) The following general spill response guidelines should be implemented by the spill response coordinator and the spill response contractor. However, each spill situation is unique, and it is the responsibility of the spill response coordinator to dictate the specific actions required to control and remediate individual spills.

a) Assess the spill, and identify the spilled material if possible.

b) Choose the proper protective clothing and gear to safely respond to the spill.

c) Stop and/or control the flow of oil into the navigable water through the use of the available on-site manpower, equipment and supplies, and/or the spill response contractor.

d) Stop or mitigate the source of the spilled material, if possible.

e) Once under control, reassess the situation and develop an action plan for clean-up.

f) Implement the action plan for spill clean-up. This may entail strategically placing spill control equipment on and around the spilled product. Special consideration should be given to preventing the migration of spilled product into waterways.

g) Collect and properly contain the spilled product and any contaminated materials in sealed 55-gallon drums or other approved containers until the MNR Safety Department characterizes the waste materials and determines the appropriate transportation/disposal procedures.

h) Decontaminate the site, spill response personnel, and the spill response equipment.

i) Complete all notifications, medical exposure reports, and other paperwork associated with the spill.

MNR at North White Plains will maintain at a minimum and at all times, the following oil spill response equipment at a predetermined location in the facility:

- water repellent sorbent pillows (10 pillows/box; 1 gallon/pillow)
- bales of water repellent sorbent pads (200 pads per bale; 16 oz./pad)
- boxes of 10' water repellent sorbent skimmer booms (2 booms/box; 8 gal./boom)
- brooms, shovels, and 55-gallon containment drums for oil, oil-contaminated sorbent, and oil-contaminated soils.

It is required that the spill response equipment be able to be easily and quickly transported to the spill si

TABLE 1

SPCC PLAN
METRO-NORTH RAILROAD

NORTH WHITE PLAINS MAINTENANCE BUILDINGS

TANK NUMBER	ABOVE/BELOW	CAPACITY	TANK MATERIAL	CONTENTS
14-F	ABOVE	5,000	STEEL	DIESEL FUEL
15-B	BELOW	20,000	RFP	#2 FUEL OIL
15-C	ABOVE	2,000	STEEL	WASTE OIL
15-D	ABOVE	2,000	STEEL	HYDRAULIC OIL
15-E	ABOVE	2,000	STEEL	ENGINE OIL
15-F	ABOVE	300	STEEL	DIESEL FUEL

NORTH WHITE PLAINS AUTO FUELING

TANK NUMBER	ABOVE/BELOW	CAPACITY	TANK MATERIAL	CONTENTS
13-L	BELOW	5,000	FRP	GASOLINE (U)
13-M	BELOW	3,000	FRP	DIESEL FUEL

NORTH WHITE PLAINS EAST YARD

TANK NUMBER	ABOVE/BELOW	CAPACITY	TANK MATERIAL	CONTENTS
13-K	BELOW	550	FRP	#2 FUEL OIL
13-N	BELOW	10,000	FRP	#2 FUEL OIL

REF1: BORDER
REF2: REF2
REF3: REF3

BRONX RIVER PARKWAY

FISHER LANE

BRONX RIVER

PARKWAY HOMES ROAD

EQUIPMENT WASH BUILDING

15-C
15-D
15-E
15-F
15-A
15-B
14-F
14-D

MAINT. OF WAY EQUIP. REPAIR FACILITY

STORAGE

MAINT. OF EQUIP. SHOP

YARD OFFICE

NEW YARD OFFICE

13-K

BROADWAY

13-M
13-L
13-N

AUTO FUEL STATION

SUBSTATION (B-24)

DINER

TRAILER

COMMUNICATIONS AND SIGNALS BUILDING

N

LEGEND

- 15-C — TANK LOCATION
- RAILROAD TRACK
- —R— PROPERTY LINE

NORTH WHITE PLAINS TANK LOCATION SITE PLAN

NOT TO SCALE.

TIME PLOTTED: THUR DEC 31, 11:35:00 1998
FILENAME: MNR3\2631-3

FIELD VERIFIED BY CKP	DATE 12/98	
DRAWN BY RJM	DATE DRAWN 12/31/98	
APPROX. SCALE NO SCALE	DATE ISSUED 12/31/98	

DAY ENGINEERING, P.C.
ENVIRONMENTAL ENGINEERING CONSULTANTS
ROCHESTER, NEW YORK

PROJECT TITLE
METRO-NORTH RAILROAD
NORTH WHITE PLAINS YARD, NORTH WHITE PLAINS, NY
SPCC PLAN

DRAWING TITLE
NORTH WHITE PLAINS
TANK LOCATION SITE PLAN

PROJECT NO.
95-2631I

FIGURE 1

SHEET 1 OF 1

F

APPENDIX F

INCIDENT INVESTIGATION REPORT

FIGURE 12-1

ENVIRONMENTAL INCIDENT INVESTIGATION REPORT

A. DESCRIPTION OF THE INCIDENT

1. Date: _____
2. Time: _____
3. Duration: _____
4. Location: _____
5. Identify hazardous or non-hazardous substance (s) involved: _____

   _____

   _____
6. Calculated amount of hazardous material released: _____

   _____

   _____
7. List equipment involved: _____

   _____
8. List personnel involved: _____

   _____

   _____
9. Describe events in chronological order: _____

   _____

   _____
10. List of consequences of the incident (i.e., fatalities; injuries; evacuees; impact on the community and the environment; damage to equipment and facilities; business interruption): _____

    _____

    _____

    _____

Incident Number: _____

Date Report Prepared: _____

B. INVESTIGATION OF CAUSES

1. Human Error: (consider training issues, experience, lack of information, contractor involvement) _____

2. Mechanical Integrity: (consider preventative maintenance issues, physical damage, unauthorized process change) _____

3. Procedural Deficiencies: (consider operating procedures, inadequate control of process change, contractor supervision, emergency procedures, outdated information) _____

4. Other: _____

C. DESCRIBE ACTIONS TO BE TAKEN TO PREVENT RECURRENCE

1. Employee Re-training _____

Responsibility: _____

2. Equipment Re-design: _____

_____

_____

_____

Responsibility: _____

3. Revision of Procedures: _____

_____

_____

_____

Responsibility: _____

4. Modification of Chemical Process: _____

_____

_____

_____

Responsibility: _____

5. Other: _____

_____

_____

_____

D. SCHEDULE FOR IMPLEMENTATION OF PREVENTATIVE ACTIONS

Activity	Start Date	End Date	Responsible Party

Incident Number: _____

Date Report Prepared: _____

E. SIGNATURES OF INVESTIGATIVE TEAM MEMBERS

_____ Date: _____

_____ Date: _____

_____ Date: _____

G

APPENDIX G

MANAGEMENT OF CHANGE FORM

FIGURE 13-1

MANAGEMENT OF CHANGE FORM

Initiator: _____ Date: _____

Type of Change: ____ Process Equipment ____ Process Chemical
(Check all which ____ Temporary ____ Process Conditions
apply) ____ Procedures ____ Other

1) Describe the desired change, potential effect on process safety, and basis for change:_____

_____

_____

_____

2) What is the desired change date? If temporary, how long/or for how many batches will the temporary change exist? _____

_____

_____

3) Will this change require:

	No	Yes	Planned Date	Accomplished Date
Employee training/awareness of change?	___	___	_____	_____
Contractor Training?	___	___	_____	_____
Change in operating procedures? Modified Engineering plans or	___	___	_____	_____

other process information? ___ ___ _____ _____

New/modified inspection and
testing requirements? ___ ___ _____ _____

Other (describe): _____

_____

_____ ___ ___ _____ _____

4) Does it appear that this change could increase the possibility of a process-related incident? Why or why not?

DECS Department Yes____ _____

No____ _____

_____ _____

Signature/date _____

Supervisor for Yard Department Yes ___ _____

No ___ _____

_____ _____

Signature/date _____

CHANGE APPROVAL (EACH TEAM MEMBER MUST SIGN)

BMP TEAM MEMBER	REVIEWED	APPROVED	DATE
_____	_____	_____	____
_____	_____	_____	____

_____	_____	_____	_____
_____	_____	_____	_____

BMP PLAN REVISED (EACH TEAM MEMBER MUST SIGN)

BMP TEAM MEMBER	REVIEWED	APPROVED	DATE
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____