FACT SHEET

HWMA/RCRA POST-CLOSURE PERMIT
MOTIVEPOWER FACILITY TEN YEAR RENEWAL
EPA ID NO. IDD980976831

This fact sheet sets forth the principle facts pertaining to a draft Post-Closure Permit that the Idaho Department of Environmental Quality (DEQ) is proposing to approve and issue to Wabtec Corporation-MotivePower (the Permittee). In accordance with IDAPA 58.01.05.012 [40 CFR § 270.10(h)], the Permittee has submitted a renewal Part A and B permit application. The Hazardous Waste Post-Closure Permit sets forth the applicable post-closure requirements DEQ intends to require of the Wabtec Corporation – MotivePower Facility (MP Facility).

The regulatory basis for the conditions and requirements of the draft Permit can be found within the Idaho *Rules and Standards for Hazardous Waste*, IDAPA 58.01.05.004 through 58.01.05.013 [40 CFR Parts 124, 260 through 266, 268, and 270]. This fact sheet was prepared in accordance with the requirements of IDAPA 58.01.05.013 [40 CFR § 124.8].

A. PURPOSE OF THE POST-CLOSURE PERMIT

The purpose of the permitting process is to specify administrative and procedural requirements, under which the Permittee will operate, to comply with the Idaho Hazardous Waste Management Act of 1983 (HWMA), as amended, and regulations promulgated thereunder by DEQ. DEQ is required to prepare a draft permit that sets forth, in one concise document, all the applicable requirements that DEQ intends to require the Permittee to comply with during the ten-year duration of the Permit.

This draft Permit was prepared based upon MotivePower's Permit Application for the post-closure operation of hazardous waste management units at the MP Facility. The application, supporting data provided by the applicant, and all other documents retained by DEQ in support of the draft Permit are available for review. DEQ has reviewed MotivePower's Post-Closure Permit Renewal Application, and proposes to approve the Post-Closure Permit. The public is given forty-five (45) calendar days to review and comment on the draft permit conditions prior to DEQ taking any final action (issue or deny) on the Permit.

B. PROCEDURES FOR REACHING A FINAL DECISION

IDAPA 58.01.05.013 [40 CFR § 124.10] requires that the public be given 45-calendar days to comment on each draft Permit presented for approval under HWMA. The comment period will begin on August 9, 2013, and will end on September 23, 2013. Any person interested in commenting on this draft permit must do so within this 45-calendar day comment period. The entire draft permit is open for public comment.

All persons wishing to comment on the Post-Closure Permit should submit their comments in writing to:

Mr. Robert Bullock
c/o Ms. Jenny Shafer
Idaho Department of Environmental Quality
Waste Management and Remediation Division
1410 North Hilton
Boise, Idaho 83706-1255
(208) 373-0502

Or by email: Pete.johansen@deq.idaho.gov

Comments may also be submitted through the comment form on the DEQ website at www.deq.idaho.gov/public-comment-opportunities. Comments should include all reasonable available references, factual grounds, and supporting material.

Opportunity for a public hearing may be provided if signed, written requests for a hearing, in accordance with IDAPA 58.01.05.013 [40 CFR § 124.11], are submitted to DEQ and received on or before September 23, 2013. If sufficient public interest is expressed in holding a public hearing, then a formal public hearing will be held. The decision on whether there is sufficient public interest in holding the hearing will be based on the receipt of written comments and requests for a public hearing.

When making the final determination regarding the approval of this Post-Closure Permit, DEQ will consider all written comments received during the public comment period, those received during the public hearing (if held), the requirements of the hazardous waste regulations of IDAPA 58.01.05.000 *et seq.*, and all other applicable federal, state, or local laws.

C. FACILITY/UNIT DESCRIPTION

The MP Facility is located at 4600 Apple Street in Boise, Idaho. The facility is approximately 36.4 acres. Heavy equipment repair and locomotive re-manufacturing commenced at the Boise Locomotive Complex in 1969. In 1984, it was determined that solvents used in the re-manufacturing process had impacted the soil and groundwater beneath the facility. From 1984 to the present, extensive site characterization and remediation have been performed at the facility.

Two (2) hazardous waste management units (WMU) exist on the facility. The Locomotive Shop Basin (LSB) is located in the southeastern portion of the facility, and the Paint Shop Basin is located near the center of the property. Both WMUs and a solid waste disposal trench located near the LSB were closed in accordance with the Resource Conservation Recovery Act (RCRA) regulations in 1988 and have asphalt caps in place with on-going maintenance. Additional groundwater characterization has been completed off-site, identifying contamination approximately 5,400 feet horizontally down gradient from the facility. The groundwater monitoring program for the MP Facility was developed based on site-specific information. Corrective action for contaminated groundwater, including a groundwater recovery and treatment system for the shallow A-zone aquifer, was initiated in 1990. In-situ bioremediation in Areas 1 and 3 has been implemented during the last ten years for treatment of groundwater contaminated with chlorinated solvents. Monitored natural attenuation is the corrective action in place for Areas 2 and 4.

D. CHRONOLOGY OF REGULATORY ACTIONS

In 1988, Boise Locomotive Company submitted a Part B Post-Closure Permit. The Part B Permit became effective on January 18, 1991. The Permit required corrective action on-site, consisting of a pump-and-treat system for removal of volatile organic constituents and groundwater monitoring. Upon discovery that contamination had migrated off-site, an extensive

off-site monitoring network was constructed. The 2002 renewal permit required continued groundwater monitoring, post-closure care and maintenance, and in-situ bioremediation as the corrective action for Areas 1 and 3, and monitored natural attenuation in Areas 2 and 4.

MotivePower submitted a new Part B Permit Application in February 2012, as part of the required ten-year permit re-issuance process. The Permit has been revised to reflect current regulatory changes, and define changes with corrective action programs on-site and off-site. Significant changes include an updated risk assessment and criteria for evaluating the in-situ bioremediation of contaminated groundwater. Corrective action measures will continue to occur on-site and off-site in specified area(s). Monitored natural attenuation will continue to be the corrective action for the remaining off-site portions of the contaminant plume. However, contingent remedies are specified if contaminant concentrations increase in the groundwater to exceed protectiveness standards specified in the Permit.

E. POST-CLOSURE PERMIT ORGANIZATION

The Post-Closure Permit is divided into five (5) sections with ten (10) Attachments as follows.

MODULE	TITLE
I	Standard Conditions
II	General Facility Conditions
III	Groundwater Monitoring Program
IV	Corrective Action Program
V	Post-Closure Care

Attachments	Topic
1	Facility Legal Description and Maps of Facility Location
2	RCRA Part A Permit Application
3	Post-Closure Operation, Inspection, Security, and Maintenance Plans
4	Personnel Training Programs
5	Procedures to Prevent Hazards and Contingency Plan
6	Post-Closure Cost-Estimate and Financial Assurance Requirements
7	Groundwater Monitoring and Sampling and Analysis Plan
8	Corrective Measures and Implementation Plan
9	Risk Assessment
10	Permit Modification Tracking Log