



RCRA COMPLIANCE EVALUATION INSPECTION

Alstom Transportation
71 Wall Street
Plattsburgh, New York

NY0001007236

February 29, 2024

Report Prepared by:

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Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at Alstom Transportation on February 29, 2024. The purpose of the inspection was to obtain information on the facility's hazardous waste management program. This information will be used to determine compliance with regulations pertaining to the Resource Conservation and Recovery Act (RCRA).

Survey Participants

Alstom Transportation

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Facility Description

Alstom Transportation, formerly known as Bombardier Transportation, is located at 71 Wall Street in Plattsburgh, New York. The facility is a manufacturer of commuter rail cars for major metropolitan transit systems. The facility began operations at this location as a finishing plant in 1995. By 2013, the plant was manufacturing rolling stock for the rail industry. In 2022, Bombardier Transportation was acquired by Alstom Transportation. The 21-acre site includes a 218,000 square foot manufacturing facility. There are 280 employees, and the plant operates two 8-hour shifts from 6 am to 11:30 pm, five days per week.

The stainless steel rail car frames come into the facility and are placed on supports in the Bogie Cell. The side walls and ceilings are welded and fused. Windows are cut out using a plasma cutter. Some roof structures are fused with spot welding robots. Paint is applied to some parts using a paint gun. Assembly of the rail cars include components such as electrical conduits, batteries, doors, windows, seats, rest rooms, stairs, and lighting. In 2023, over 200 rail cars were manufactured and assembled at the Plattsburgh facility. After the assembly is completed, the rail cars are transferred to another Alstom facility for testing.

Water and Wastewater

Water for the facility is provided by the City of Plattsburgh. Sanitary wastewater is discharged to the local POTW. There is no process wastewater discharged from the facility.

Solid and Hazardous Waste Management

Hazardous waste is generated during painting of rail car parts. Lacquer thinner is used to clean the paint guns. Waste paint and spent lacquer thinner are placed in a 55-gallon drum and stored in the Hazardous Materials Storage Room. The RCRA hazardous waste codes for the waste flammable liquids containing waste paint related material are D001, F003, and F005.

Waste paint filters are placed in a 55-gallon drum and stored in the Hazardous Materials Storage Room. The RCRA hazardous waste codes for the waste flammable solids are D001, F003, and F005.

Used fluorescent lamps containing mercury are collected in bulb boxes and stored in the Hazardous Materials Storage Room as universal waste.

Used oil from machinery is collected in 55-gallon drums and stored in the Hazardous Materials Storage Room as non-hazardous used oil.

All solid and hazardous waste management of containers is provided by Veolia ES Technical Solutions of Latham, New York. Containers of waste flammable liquids, waste flammable solids, and used oil are shipped to the Veolia treatment, storage, and disposal facility (TSDf) in West Carrollton, Ohio. Containers of universal waste, consisting of used fluorescent lamps, are shipped to the Veolia TSDf in West Bridgewater, Massachusetts.

Observations

A review of the hazardous waste manifests indicates that Alstom Transportation is a small quantity generator of hazardous waste. In 2023, the facility generated 3810 pounds of waste flammable liquids and waste flammable solids from its painting operations. The most recent shipment of hazardous waste was on February 27, 2024.

On the day of the inspection, there were two 55-gallon drums of hazardous waste being stored in the Hazardous Materials Storage Room. One drum was almost empty with a hazardous waste label and a flammable liquid label attached to the container. The hazardous waste label was marked with an accumulation start date of 2/27/24, waste flammable liquids, and EPA waste codes D001, F003, and F005. The second drum was one-fourth full, with a hazardous waste label and a flammable solid label attached to the container. The hazardous waste label was marked with an

accumulation start date of 2/27/24, hazardous waste solids, and EPA waste codes F003 and F005. The lid was not on the container.

The facility maintains weekly inspection logs of the Hazardous Materials Storage Room.

Hazardous materials safety training is provided annually to employees that handle hazardous waste. Two employees maintain their training for Department of Transportation (DOT) shipping certification.

The facility maintains waste analysis profile forms for all solid and hazardous wastes generated on site.

Findings

The 55-gallon drum of hazardous waste solids was open with the lid off the container. Containers holding hazardous waste must be kept closed during storage, except when adding or removing waste, as specified in 40 CFR Section 265.173(a). The facility representative was informed of this requirement and the lid was placed on the drum immediately.

Attachments

Photographs (#1 - #5)

Photo #1: View of the drum of waste flammable liquids.



Photo #2: View of the drum of hazardous waste solids with the lid off.



Photo #3: View of the drum of hazardous waste solids after the lid was placed on the container.



Photo #4: View of the containers of universal waste.



Photo #5: View of the containers of used oil.

