



March 21, 2011

Mr. Brian R. Monson, Director
c/o Hazardous Waste Program Manager
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

Re: Corporate Guarantee Post-Closure Care
Wabtec Corporation - MotivePower Facility
4600 Apple Street
Boise, Idaho
EPA ID No. IDD980976831

Dear Mr. Monson:

Guarantee made this 21st day of March, 2010 by Westinghouse Airbrake Technologies Corporation (Wabtec), a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor. This guarantee is made on behalf of MotivePower, a Wabtec Company of 4600 Apple Street, Boise, Idaho 83716, which is: "our subsidiary," to the Idaho Department of Environmental Quality (IDEQ).

Recitals

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).
2. MotivePower owns or operates the following hazardous waste management facility covered by this guarantee:

Wabtec Corporation - MotivePower Facility
4600 Apple Street
Boise, Idaho
EPA ID No. IDD980976831

This guarantee is for post-closure care.

Table I-3

Post-Closure Cost Estimate
Wabtec-MotivePower Facility
U. S EPA No.: IDD980976831
Boise, Idaho

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Item	Units	Quantity	Unit Cost	Extention	Reference	
A Zone Corrective Action Monitoring						
VOC Analysis (includes duplicates, blanks, and carbon sampling)	sample analysis	130	\$ 75.00	\$ 9,750.00	A	
Iron Analysis	sample analysis	25	\$ 30.00	\$ 750.00	A	
Bioremediation Parameter Analysis	sample analysis	25	\$ 183.00	\$ 4,575.00	A	
Sample Collection Labor	sample collected	104	\$ 82.50	\$ 8,580.00	B	
Sample Collection Expenses	per day	20	\$ 61.67	\$ 1,233.33	C	
Monitoring Well Replacement (2 wells to 100 feet)	monitoring well	2	\$ 8,425.00	\$ 16,850.00	D	
Monitoring Well Replacement (1 well to 30 feet)	monitoring well	1	\$ 3,175.00	\$ 3,175.00	D	
A-Zone Report Preparation	report	2	\$ 6,911.00	\$ 13,822.00	E	
Total Annual Cost for A Zone						\$ 58,735.33
B Zone Detection Monitoring						
VOC Analysis (includes duplicates, blanks, and carbon sampling)	sample analysis	21	\$ 75.00	\$ 1,575.00	A	
Appendix IX metals	sample analysis	4	\$ 150.00	\$ 600.00	A	
Appendix IX Entire List	sample analysis	1	\$ 1,390.00	\$ 1,390.00	A	
Sample Collection Labor	sample collected	18	\$ 82.50	\$ 1,485.00	B	
Sample Collection Expenses	per day	4	\$ 61.67	\$ 246.67	C	
Monitoring Well Replacement (1 well to 150 feet)	monitoring well	1	\$ 24,975.00	\$ 24,975.00	F	
B-Zone Report Preparation	report	2	\$ 4,954.00	\$ 9,908.00	G	
Total Annual Cost for B Zone						\$ 40,179.67
Groundwater Recovery System O&M						
VOC Analysis		4	\$ 75.00	\$ 300.00	A	
System maintenance labor, parts, and utilities		1	\$ 16,440.00	\$ 16,440.00	H	
Total Annual Cost for Groundwater Recovery System O&M						\$ 16,740.00
Cap Inspection and Maintenance						
Annual Inspection by Engineer	inspection event	1	\$ 650.00	\$ 650.00	I	
Quarterly Inspection	inspection event	4	\$ 105.00	\$ 420.00	J	
Annual Repairs	lump sum	1	\$ 590.00	\$ 5,000.00	K	
Pavement Re-Sealing	pro-rated annual cost	1	\$ 500.00	\$ 500.00	L	
Pavement Re-Surfacing	pro-rated annual cost	1	\$ 4,000.00	\$ 4,000.00	M	
Surface Water Runoff Control Repairs	lump sum	1	\$ 540.00	\$ 540.00	N	
Cleanout of Surface Water Runoff Controls (pro-rated over 15 years)	pro-rated annual cost	1	\$ 284.00	\$ 284.00	O	
Total Annual Cost for Cap Inspection and Maintenance						<u>\$ 11,394.00</u>
Total Annual Cost						\$ 127,049.00
Cost with 5% Contingency Added						\$ 133,401.45

Table I-3 (cont.)

References:

A		Laboratory Analysis		
Item				Estimated Cost
EPA 8260 VOCs Analysis				\$ 75.00
Iron				\$ 30.00
MNA/Bioremediation Parameters				\$ 183.00
Appendix IX Metals Only				\$ 150.00
Appendix IX Entire List				\$ 1,390.00

B		Sample Collection Labor	Hours	Rate	
Item					Estimated Cost
Technician			1.5	55	\$ 82.50

C		Sample Collection Expenses	Amount	Cost	
Item				per day	Estimated Cost
Bailer			1	15	\$ 15.00
PPE/disposables			6	25	\$ 4.17
Field Parameter Testing equipment*					
		<i>Fe Colorimeter</i>	6	40	\$ 6.67
		<i>YSI or Horiba</i>	6	125	\$ 20.83
Purging Pump*			6	50	\$ 8.33
Depth-to-water Indicator*			6	40	\$ 6.67
		Total			\$ 61.67

* Indicates estimated cost is based on collecting 6 samples per day at daily equipment rental rates plus 1 bailer/day.

Table I-3 (cont.)

D	A-Zone Monitoring Well Replacement	Amount	Per Unit Cost	
	Item			Estimated Cost
	Drill Rig Mob./demob.			\$ 500.00
	Decontamination	2	175	\$ 350.00
	Well Installation/Augering (4-inch diam well)	100	75	\$ 7,500.00
	Wellhead Protective Casing	1	75	\$ 75.00
	Total			\$ 8,425.00
	Item			Estimated Cost
	Drill Rig Mob./demob.			\$ 500.00
	Decontamination	2	175	\$ 350.00
	Well Installation/Augering (4-inch diam well)	30	75	\$ 2,250.00
	Wellhead Protective Casing	1	75	\$ 75.00
	Total			\$ 3,175.00
E	A-Zone Report Preparation	Hours	Cost	
	Item			Estimated Cost
	Project Director	4	189	\$ 756.00
	Project Engineer	6	131	\$ 786.00
	Project Geologist	25	105	\$ 2,625.00
	Environmental Scientist	20	71	\$ 1,420.00
	Administrative Assistant	8	60	\$ 480.00
	Draftsperson	4	136	\$ 544.00
	Direct Expenses (supplies, shipping, etc)			\$ 300.00
	Total			\$ 6,911.00

Table I-3 (cont.)

F	B-Zone Monitoring Well Replacement	Amount	Per Unit Cost	
	Item			Estimated Cost
	Drill Rig Mob./demob.			\$ 500.00
	Decontamination	4	175	\$ 700.00
	Well Installation/Augering (4.25-inch augers)	150	158	\$ 23,700.00
	Wellhead Protective Casing	1	75	\$ 75.00
	Total			\$ 24,975.00
G	B-Zone Report Preparation			
	Item			Estimated Cost
	Project Director	4	189	\$ 756.00
	Project Engineer	4	131	\$ 524.00
	Project Geologist	18	105	\$ 1,890.00
	Environmental Scientist	12	71	\$ 852.00
	Administrative Assistant	6	60	\$ 360.00
	Draftsperson	4	68	\$ 272.00
	Direct Expenses (supplies, shipping, etc)	1	300	\$ 300.00
	Total			\$ 4,954.00

Table I-3 (cont.)

H	Treatment System Maintenance	Hours	Rate	
	Not applicable at this time			Estimated Cost
	Technician	208	55	\$ 11,440.00
	Replacement Parts and Utilities			\$ 5,000.00
				<u>\$ 16,440.00</u>
I	Annual Cap Inspection by Engineer			
	Item			Estimated Cost
	Engineer	4	150	\$ 600.00
	Direct Expenses			\$ 50.00
		Total		<u>\$ 650.00</u>
J	Quarterly Cap Inspection			
	Item			Estimated Cost
	Technician	1	55	\$ 55.00
	Direct Expenses			\$ 50.00
		Total		<u>\$ 105.00</u>

Table I-3 (cont.)

K		Annual Cap Repairs		
	Item			Estimated Cost
	Technician	8	55	\$ 440.00
	Direct Expenses (sealant, disposables, tools, etc.)			\$ 150.00
	Total			<u>\$ 590.00</u>
L		Pavement Re-Sealing (pro-rated over 5 years)		
	Item			Estimated Cost
	Technician	16	55	\$ 880.00
	Direct Expenses (sealant, disposables, tools, etc.)			\$ 1,700.00
	Total			<u>\$ 2,580.00</u>
	Pro-rated Annual Cost (\$2,500 over 5 years)			\$ 500.00
M		Pavement Re-Surfacing (pro-rated over 15 years)		
	Item			Estimated Cost
	1-inch Thick Asphalt Overlay (40,000 square feet at \$1.50 per square foot)			\$ 60,000.00
	Pro-rated Annual Cost (\$60,000 over 15 years)			\$ 4,000.00

Table I-3 (cont.)

N		Surface Water Runoff Control Inspections and Repairs		
	Item			Estimated Cost
	Technician	8	55	\$ 440.00
	Direct Expenses (tools, disposables, etc.)			\$ 100.00
	Total			<u>\$ 540.00</u>
O		Cleanout of Surface Water Runoff Controls (pro-rated over 15 years)		
	Item			Estimated Cost
	Technician	32	55	\$ 1,760.00
	Equipment Rental			\$ 2,000.00
	Direct Expenses (tools, disposables, etc.)			\$ 500.00
	Total			<u>\$ 4,260.00</u>
	Pro-rated Annual Cost (\$4,100 over 15 years)			\$ 284.00

Table 1-2

2012 Post-Closure Estimated Annual Cost
Wabtec-MotivePower Facility
U. S EPA No.: IDD980976831
Boise, Idaho

Year	Annual Cost ⁽¹⁾ (inflated 3% per year) ⁽²⁾
2012	\$127,049.00
2013	\$130,860.47
2014	\$134,786.28
2015	\$138,829.87
2016	\$142,994.77
2017	\$147,284.61
2018	\$151,703.15
Total	\$973,508.16

Footnotes:

- ⁽¹⁾ Post closure care cost is based on Table I-3. Laboratory analytical costs reflect current analytical pricing.
- ⁽²⁾ An annual inflation rate of 3% was used to account for variability in the rate from year to year.

SECTION I

CLOSURE AND POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS



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I. CLOSURE AND POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS

This section describes the Closure and Post-Closure Plans and presents the financial assurance mechanism and estimated costs for performing Post-Closure activities at the facility. The regulated Waste Management units (WMUs) at the Wabtec Corporation-MotivePower (MP) facility were closed in accordance with the drain field closure plan (MK, 1986) that is maintained in the permanent operating record at the MP facility in Boise, Idaho.

I-1 Closure Plan

MK received approval in November 1987 of the closure plan, which required the construction of an impermeable asphalt cap over the Locomotive Shop Basin and the non-regulated Waste Disposal Trench (LSB/WDT) and surface water controls. Cap construction was completed on June 13, 1988. The Paint Shop and locomotive shop buried drain fields were closed as RCRA-regulated WMUs in accordance with the closure plan (MK, 1986) on July 18, 1988. Closure certification required under 40 CFR Parts 264.115-119 was completed on August 11, 1988.

I-2 Post-Closure Plan

This section provides a general description and an overview of the inspections, operations, and maintenance of Post-Closure activities conducted at the MP facility.

The implemented closure plan minimizes the need for Post-Closure maintenance. Post-Closure activities consist primarily of inspection and maintenance associated with the existing asphalt caps, runoff control systems, and the use of enhanced bioremediation injection to help further reduce impacts to groundwater attributable to historical site operations.

I-2a *Inspection Plan*

This section describes the inspection activities to be conducted that are associated with the Post-Closure activities for the MP facility. A schedule of the inspection and maintenance activities for the Post-Closure care period is presented in Table I-1 (Inspection Schedule).

I-2a(1) Asphalt Cap Inspections

Each asphalt surface covering the closed RCRA-regulated paint shop basin (PSB) and the closed RCRA-regulated LSB/WDT will be inspected quarterly to identify specific conditions that threaten the cap's integrity. Each asphalt surface will also be inspected and evaluated annually to determine the general condition of the cap for establishing the general maintenance program for the surface to be performed that year.

Quarterly visual inspections will be performed by qualified technicians to examine the caps for any damage or conditions that threaten their integrity. Such conditions include cracks that have penetrated the entire distance between the surface and the base course and/or any damage or deterioration that has reduced the thickness of material to less than half of the original thickness. The inspector will walk the asphalt surfaces and delineate any damage or conditions requiring repair. The inspector will also examine the ancillary drainage structures and note any blockages or damage that impair their function. A log of each quarterly inspection will be completed by the inspector. A copy of the Asphalt Cap Quarterly Inspection Form is presented as Appendix I-1.

An annual inspection will be performed by a registered professional engineer with experience in the design and/or construction of asphalt pavement. The annual evaluation will be conducted in the spring of each year following thaw. A portion of the inspection will be performed during a heavy precipitation event or heavy snow melt, so that the drainage system can be observed. The registered professional engineer will conduct the inspection in accordance with procedures outlined in Asphalt Institute Information Series No. 169, *A Pavement Rating System for Low Volume Asphalt Roads*. The Annual Asphalt Cap Evaluation Form, along with the Asphalt Institute Information Series No. 169 guidelines, are presented as Appendix I-2. The completed annual inspection forms will be maintained in MP's RCRA compliance files. In addition, the registered professional engineer will note any special conditions (i.e., low spots, potholes with maximum undrained water depths of at least one inch, alligator or shrinkage cracks with grid spacing of six-inches or less covering an area of 100 square feet or greater) that potentially threaten the integrity of the caps. If the overall rating is less than or equal to 80, but greater than 50, the surface will be repaired, so that upon reevaluation, the rating is at least 85. If the overall rating is less than 50 the entire surface will be reconstructed.

I-2a(2) Surface Runoff Control Structures Inspection

The surface water diversion plan was designed to require limited maintenance. Potential damage to existing structures following the 24-year, 24-hour design storm are not expected to be significant.

Surface runoff control structures will be inspected following periods of increased runoff (i.e., heavy rainfall, etc.) at a minimum of annual inspections. These inspections will consist of visual examination of water control structures for damage resulting in decreased capacity to route runoff away from the former waste management units (WMUs). A copy of the Surface Water Control Structures Inspection Form is presented as Appendix I-3. Completed forms will be maintained by the plant manager and corporate environmental compliance personnel.

I-2a(3) Monitoring Well Network Inspection

The groundwater monitoring network will be periodically inspected during sampling of the wells. Static water level, pumping rate (i.e., volume of water purged from casing storage per time required for casing purge), water level after purging, and any increases in turbidity following purging are noted in the field sampling record book for each well at the time of sampling. The field record book is maintained on-site. Well sounding is also conducted during the sampling events to evaluate if excess silting has occurred. Excess silt will be removed when necessary as indicated in Section I-2c (3).

I-2a(4) Groundwater Recovery and Treatment System Inspection

Groundwater recovery and treatment was previously conducted as part of the corrective action program (CAP) at well locations (MW-9/RW-1, RW-3, RW-4, RW-6, and MW-1A1/RW-7). The groundwater recovery and treatment system was operated until September 23, 2002 when the emulsified vegetable oil (EVO, VegOil) treatment pilot program was implemented in September 2002. Section E of this document provides information regarding the historical use of groundwater recovery wells and monitoring wells at the MP facility.

I-2a(5) Warning Sign Inspection

Each warning sign posted on the facility's perimeter fence will be inspected on a quarterly basis to ensure that the sign is present and legible, as shown on Figure B-5. Quarterly visible inspections will be recorded on the Asphalt Cap Quarterly Inspection Form (Appendix I-1).

I-2b Monitoring Plan

The original sampling and analysis plan that was used at the MP facility was contained in the original Part B permit application (MK, 1986) and Post-Closure Plan (MK, 1988). A revised sampling and analysis plan was included in the first Part B Permit (IDHW, 1991) and in the September 1995 revision to the permit (IDHW, 1995, Attachment E). A revised sampling and analysis plan was included in the Part B renewal application (MP, 2001). An updated sampling and analysis plan is included as Appendix E-12.

Following completion of the groundwater sampling events and receipt of the analytical results, MP submits copies to the IDEQ in accordance with the reporting requirements of the Part B Permit. Field sampling logs and laboratory results are maintained as part of the MP facility operating record and are not included with this document.

I-2c Maintenance Plan

This section describes the anticipated maintenance activities associated with the Post-Closure activities for the MP facility.

I-2c(1) Asphalt Cap Maintenance

Repair needs identified during the inspections will be made, based on defect type, within 60 days after the defect has been identified for limited areas, or within 90 days for general repairs to the entire surface unless weather conditions make proper repairs difficult. Cracks will be sealed using a tar-based compound. Damaged or deteriorated areas will be appropriately repaired. The original asphaltic surface may be overlaid with a new surface course if the original is sealed or otherwise treated to provide a stable base. An appropriate geotextile may be installed between the original and new surface course to inhibit reflective cracking, if necessary. Materials and construction methods used to repair defective areas will be the same as those used for the original construction unless approval is received from the IDEQ. All live or dead vegetation found on the asphalt surfaces or drainage surfaces will be removed before repair of the damaged area. No herbicides or other chemical methods will be used to control vegetation.

I-2c(2) Surface Runoff Control Structures Maintenance

All necessary repairs to the surface runoff control structure such as regrading or debris removal will be performed in a timely manner to allow proper drainage of the closed WMUs.

I-2c(3) Monitoring Well Network Maintenance

If a significant decline in well performance is observed due to sediment plugging, a qualified contractor will redevelop the well. The contractor will be trained in the proper handling of the material and the hazards to which they may be exposed.

I-2c(4) Warning Sign Maintenance

If a warning sign is missing or damaged, replacement will be performed in a timely manner.

I-2d *Land Treatment*

The implemented Closure Plan does not include any land treatment units; therefore, operation, inspection and maintenance programs for land treatment are not applicable.

I-2e *Post-Closure Care for Miscellaneous Units*

The implemented Closure Plan does not include any miscellaneous units; therefore, Post-Closure care for miscellaneous units is not applicable.

I-2f *Post-Closure Security*

As a matter of routine site operations, the security fence surrounding the MP facility is inspected and maintained on a regular basis. Posted warning signs are also inspected to make sure they are visible and intact. In addition, a full-time security force is maintained by the facility to control and prohibit access to the facility by any unauthorized personnel. These site security operations are anticipated to be continued throughout the duration of the Post-Closure period. Any changes to the site security operations will be submitted to the IDEQ before implementation.

I-2g *Post-Closure Contact*

The following individual should be contacted regarding the care and maintenance of the units during the Post-Closure care period:

Name:	<u>Brian Morgan</u>
Title:	<u>Controller</u>
Address:	<u>4600 Apple Street, Boise, Idaho 83716</u>
Phone Number:	<u>(208) 947-4800</u>

I-3 Required Notices

I-3a *Certification of Closure*

All RCRA WMUs at the facility have been closed. The Certification of Closure was signed by MK on August 11, 1988 and submitted to the U.S. EPA Region 10 in accordance with IDAPA 16.01.05.0008 (40 CFR §264.115).

I-3b *Survey Plat*

A survey plat indicating the location and dimensions of the WMUs for the MP facility is presented in Appendix B-4 (On-the-Ground Survey). The plat was filed with Ada County on August 11, 1988.

I-3c Post-Closure Certification

Within 60 days of completion of the Post-Closure care period for each WMU, a certification will be submitted to the IDEQ. The certification will certify that the Post-Closure care period was performed in accordance with the specification of the Post-Closure Plan.

I-3d Post-Closure Notices

The following Post-Closure notices have been appropriately filed and are included in Appendix B-1 (Legal Descriptions and Record of Survey):

- A record of the quantity, type, and location of hazardous wastes disposed of in each WMU has been submitted to the IDEQ.
- A notation has been made to the deed to the facility property notifying any potential purchasers of the property that the land has been used to manage hazardous waste and use of the land is restricted to activities that will not disturb the integrity of the final cover system or monitoring system during the Post-Closure care period.
- A certification that the deed notice has been made has been submitted to the IDEQ.

I-4 Closure Estimate

Closure of the regulated WMUs at the facility was completed in June 13, 1988; therefore, no estimated closure cost is provided.

I-5 Financial Mechanism for Closure

Closure of the regulated WMUs at the facility was completed on July 18, 1988; therefore, no financial mechanism for closure is required.

I-6 Post-Closure Cost Estimate

The estimated annual cost for the Post-Closure activities is presented in Table I-2. Table I-3 presents estimated costs and associated frequencies of Post-Closure activities broken down by monitoring and maintenance activity. Detailed descriptions of activities to be performed during the Post-Closure period are provided in Section I-2 of this document. All estimates were prepared using year 2012 dollars. The

Post-Closure cost estimate will be maintained and adjusted annually for inflation per regulations specified in IDAPA 58.01.05.008 (40 CFR §264.144) by the MP facility's business manager.

I-7 Financial Assurance Mechanism for Post-Closure

Financial assurance for Post-Closure care will be maintained through corporate guarantee and application of appropriate financial test criteria. Copies of the corporate guarantee and associated financial certifications are presented as Appendix I-4.

I-8 References

Idaho Department of Health and Welfare (IDHW). 1991. *(Original) Part B Permit*.

---. 1995. *Part B Permit (Revision)*, September.

Idaho Department of Environmental Quality (IDEQ). 2002. *Part B Permit (Revision)*, August. Morrison-Knudsen (MK) Company, Inc. 1986. *Part B Permit Application, Drain Field Closure Plan, Boise Industrial Complex*, May, revised September.

---. 1988. *Part B Permit Application Post-Closure Plan*, submitted July.

MotivePower, A Wabtec Company. 2001. *Resource Conservation and Recovery Act Part B Hazardous Waste Post-Closure Permit Renewal Application*. December.

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APPENDIX I-1

ASPHALT CAP QUARTERLY INSPECTION FORM



APPENDIX I-2

ANNUAL ASPHALT CAP EVALUATION FORM AND GUIDELINES



APPENDIX I-3

SURFACE WATER CONTROL STRUCTURES INSPECTION FORM



APPENDIX I-4

CORPORATE GUARANTEE AND FINANCIAL CERTIFICATIONS



3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by subpart G of 40 CFR parts 264 and 265 for the closure and post-closure care of facilities as identified above.
4. For value received from MotivePower, guarantor guarantees to IDEQ that in the event that MotivePower fails to perform post-closure care of the above facility in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in subpart H of 40 CFR part 264 or 265, as applicable, in the name of MotivePower in the amount of the current closure or post-closure cost estimates as specified in subpart H of 40 CFR parts 264 and 265.
5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the Idaho Department of Environmental Quality and to MotivePower that he intends to provide alternate financial assurance as specified in subpart H of 40 CFR part 264 or 265, as applicable, in the name of MotivePower. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless MotivePower has done so.
6. The guarantor agrees to notify the Director of the Idaho Department of Environmental Quality by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.
7. Guarantor agrees that within 30 days after being notified by the Director of the Idaho Department of Environmental Quality of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in subpart H of 40 CFR part 264 or 265, as applicable, in the name of MotivePower unless MotivePower has done so.
8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR part 264 or 265.
9. Guarantor agrees to remain bound under this guarantee for as long as Motive Power must comply with the applicable financial assurance requirements of subpart H of 40 CFR parts 264 and 265 for the above-listed facilities, except as provided in paragraph 10 of this agreement.
10. Guarantor may terminate this guarantee by sending notice by certified mail to the Director of the Idaho Department of Environmental Quality and to MotiverPower,

Mr. Brian R. Monson, Director
Brian R. Monson
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provided that this guarantee may not be terminated unless and until MotivePower obtains, and the Director of the Idaho Department of Environmental Quality approve, alternate closure and/or post-closure care coverage complying with 40 CFR 264.143, 264.145, 265.143, and/or 265.145.

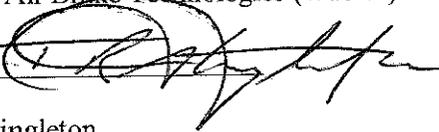
11. Guarantor agrees that if MotivePower fails to provide alternate financial assurance as specified in subpart H of 40 CFR part 264 or 265, as applicable, and obtain written approval of such assurance from the Director of the Idaho Department of Environmental Quality within 90 days after a notice of cancellation by the guarantor is received by the Director of the Idaho Department of Environmental Quality from guarantor, guarantor shall provide such alternate financial assurance in the name of MotivePower.

12. Guarantor expressly waives notice of acceptance of this guarantee by the IDEQ or by MotivePower. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permit(s).

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date first above written.
Effective date: March 21st, 2011

[Name of guarantor]: Westinghouse Air Brake Technologies (Wabtec)

[Authorized signature for guarantor]

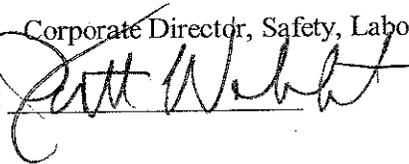


[Name of person signing]: Todd R. Shingleton

[Title of person signing]:

Corporate Director, Safety, Labor Relations, Environmental

Signature of witness or notary:



Report of Independent Accountants on Applying Agreed-Upon Procedures

To the Management of Westinghouse Air Brake Technologies Corporation:

We have performed the procedures enumerated below, which were agreed to by the management of Westinghouse Air Brake Technologies Corporation (the Company), solely to assist you in evaluating management's assertion about the Company's compliance with the United States Environmental Protection Agency regulations as specified in Subpart H of 40 CFR 264 and 265, and the related amounts on the Financial Test for Closure and Post-Closure Care (the Schedule), as of and for the Company's fiscal year ended December 31, 2010, included in management's letter dated March 21, 2011. The Company's management is responsible for the Schedule. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures and findings were as follows:

We obtained the Schedule as of and for the fiscal year ended December 31, 2010. We agreed the amounts for total liabilities, tangible net worth, net worth, current assets, current liabilities, net working capital, adjusted net income (United States Environmental Protection Agency regulations as specified in Subpart H of 40 CFR 264 and 265), total assets in the United States in the Schedule with amounts included in or derived from the consolidated financial statements of the Company including amounts contained in the footnotes to such financial statements (principally, but not limited to, footnote disclosures related to business segments).

We have audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States), the consolidated financial statements of the Company and subsidiaries for the year ended December 31, 2010, and have issued our report thereon dated February 25, 2011.

We were not engaged to and did not conduct an examination of the Schedule, the objective of which would be the expression of an opinion on such Schedule as of and for the fiscal year ended December 31, 2010. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of the Company and the State of Idaho Department of Environmental Quality, Waste Management and Remediation Division, and is not intended to be and should not be used by anyone other than these specified parties. This report or any portion, summary or abstract of it may not be quoted or referred to, in any document filed or distributed in connection with (i) a purchase or sale of securities to which the United States or state securities laws ("Securities Laws") are applicable, or (ii) periodic reporting obligations under Securities Laws.

Ernst & Young LLP

March 21, 2011

Report of Independent Registered Public Accounting Firm

The Board of Directors and Shareholders of
Westinghouse Air Brake Technologies Corporation:

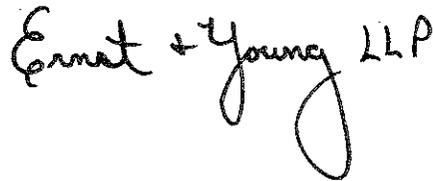
We have audited the accompanying consolidated balance sheets of Westinghouse Air Brake Technologies Corporation and subsidiaries as of December 31, 2010 and 2009, and the related consolidated statements of income, shareholders' equity and cash flows for each of the three years in the period ended December 31, 2010. Our audits also included the financial statement schedule listed in the index at Item 15(a). These financial statements and schedule are the responsibility of the Company's Management. Our responsibility is to express an opinion on these financial statements and schedule based on our audits.

We conducted our audits in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by Management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the consolidated financial position of Westinghouse Air Brake Technologies Corporation and subsidiaries as of December 31, 2010 and 2009, and the consolidated results of their operations and their cash flows for each of the three years in the period ended December 31, 2010, in conformity with U.S. generally accepted accounting principles. Also, in our opinion, the related financial statement schedule, when considered in relation to the basic financial statements taken as a whole, presents fairly in all material respects the information set forth therein.

We also have audited, in accordance with the standards of the Public Company Accounting Oversight Board (United States), Westinghouse Air Brake Technologies Corporation's internal control over financial reporting as of December 31, 2010, based on criteria established in Internal Control—Integrated Framework issued by the Committee of Sponsoring Organizations of the Treadway Commission and our report dated February 25, 2011 expressed an unqualified opinion thereon.

Pittsburgh, Pennsylvania
February 25, 2011





1001 Air Brake Avenue
Wilmerding PA, 15148
Phone: 412-825-1106
Fax: 412-825-1156

March 21, 2011

Mr. Brian R. Monson, Director
c/o Hazardous Waste Program Manager
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

Re: 2011 Financial Assurance
Letter from Chief Financial Officer

Dear Mr. Monson:

I am the chief financial officer of Westinghouse Airbrake Technologies Corporation (Wabtec), located at 1001 Air Brake Avenue, Wilmerding, Pennsylvania. This letter is in support of this firm's use of the financial test to demonstrate financial assurance for closure and/or post-closure costs, as specified in subpart H of 40 CFR parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

None

2. This firm guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, the closure or post-closure care of the following facility owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

Wabtec Corporation - MotivePower Facility
4600 Apple Street
Boise, ID 83707
EPA Identification No. IDD980976831

The post-closure cost estimate is \$ 857,095.64.

The firm identified above is: (1) The direct or higher-tier parent corporation of the owner or operator.

3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR part 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through

the use of a test equivalent or substantially equivalent to the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

None

4. This firm is the owner or operator of the following hazardous waste management facility for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in subpart H of 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

None

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

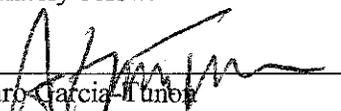
The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 2010.

FINANCIAL TEST FOR CLOSURE & POST-CLOSURE CARE

Alternative 1 (amounts in '000s)

1. Sum of current post-closure cost estimate	\$ <u>857</u>
2. Total liabilities [if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4]	\$ <u>899,123*</u>
3. Tangible net worth	\$ <u>141,213*</u>
4. Net worth	\$ <u>903,958*</u>
5. Current assets	\$ <u>801,953*</u>
6. Current liabilities	\$ <u>348,374*</u>
7. Net working capital [line 5 minus line 6]	\$ <u>453,579*</u>
8. The sum of net income plus depreciation, depletion, and amortization	\$ <u>161,685*</u>
9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	\$ <u>707,052*</u>
10. Is line 3 at least \$10 million? (Yes/No)	<u>Yes</u>
11. Is line 3 at least 6 times line 1? (Yes/No)	<u>Yes</u>
12. Is line 7 at least 6 times line 1? (Yes/No)	<u>Yes</u>
13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14 (Yes/No)	<u>No</u>
14. Is line 9 at least 6 times line 1? (Yes/No)	<u>Yes</u>
15. Is line 2 divided by line 4 less than 2.0? (Yes/No)	<u>Yes</u>
16. Is line 8 divided by line 2 greater than 0.1? (Yes/No)	<u>Yes</u>
17. Is line 5 divided by line 6 greater than 1.5? (Yes/No)	<u>Yes</u>

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.



 Alvaro Garcia-Luna
 Chief Financial Officer
 March 21, 2011

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549**

FORM 10-K

Annual Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934
For the fiscal year ended December 31, 2010

OR

Transition Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934
For the transition period from _____ to _____
Commission file number 1-13782

WESTINGHOUSE AIR BRAKE TECHNOLOGIES CORPORATION
(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

1001 Air Brake Avenue
Wilmerding, Pennsylvania 15148
(Address of principal executive offices, including zip code)

25-1615902
(IRS Employer
Identification No.)

(412) 825-1000
(Registrant's telephone number)

Securities registered pursuant to Section 12(b) of the Act:

Title of Class	Name of Exchange on which registered
Common Stock, par value \$.01 per share	New York Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark if the registrant is a well-known seasoned issuer, as defined in Rule 405 of the Securities Act. Yes No .

Indicate by check mark if the registrant is not required to file reports pursuant to Section 13 or 15(d) of the Act. Yes No .

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports) and (2) has been subject to such filing requirements for the past 90 days. Yes No .

Indicate by check mark whether the registrant has submitted electronically and posted on its corporate Web site, if any, every Interactive Data File required to be submitted and posted pursuant to Rule 405 of Regulation S-T during the preceding 12 months (or for such shorter period that the registrant was required to submit and post such files) Yes No .

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K or any amendment to this Form 10-K. .

Indicate by check mark whether the registrant is a large accelerated filer, an accelerated filer, a non-accelerated filer, or a smaller reporting company. See the definitions of "large accelerated filer," "accelerated filer" and "smaller reporting company" in Rule 12b-2 of the Exchange Act. (Check one):

Large accelerated filer Accelerated filer Non-accelerated filer Smaller reporting company

Indicate by check mark whether the registrant is a shell company (as defined in Rule 12b-2 of the Exchange Act). Yes No .

The registrant estimates that as of June 30, 2010, the aggregate market value of the voting shares held by non-affiliates of the registrant was approximately \$1.8 billion based on the closing price on the New York Stock Exchange for such stock.

As of February 22, 2011, 47,960,461 shares of Common Stock of the registrant were issued and outstanding.

DOCUMENTS INCORPORATED BY REFERENCE:

Portions of the Proxy Statement for the registrant's Annual Meeting of Stockholders to be held on May 11, 2011 are incorporated by reference into Part III of this Form 10-K.