



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

June 14, 2016

VIA EMAIL

Mr. Tyson Long
Progress Rail Manufacturing Corporation
3500 S Cowan Rd
Muncie, IN 47302

Re: Inspection Summary Letter
Progress Rail Manufacturing Corporation
IND006062582
Muncie, Delaware County

Dear Mr. Long:

On 6/7/2016, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Progress Rail Manufacturing Corporation, located at 3500 S Cowan Rd, Muncie, IN. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Compliance Evaluation Inspection

Results of Inspection: No Violation(s) Discovered

Please direct any response to this letter and any questions to me at (317) 727-4269.

Sincerely,

A handwritten signature in blue ink that reads "Dwayne Caldwell". The signature is written in a cursive style.

Dwayne Caldwell
Hazardous Waste Compliance Section
Compliance and Response Branch

Enclosure

cc: Delaware County Health Department
Scott Jagger



**INDUSTRIAL/HAZARDOUS
WASTE INSPECTION REPORT**
INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Dwayne Caldwell
Others Present	N/A
Date:	Tuesday, June 07, 2016
Time In:	9:16 AM
Time Out:	12:00 PM
Inspection Type	Compliance Evaluation Inspection

General Information

Facility Information	
Facility Name	Progress Rail Manufacturing Corporation
Facility Location	3500 S Cowan Rd Muncie, IN 47302 Delaware County
Facility Mailing Information	Same Address as Facility
Facility Contact	Scott Jaagger 256-505-6125 256-505-6599 sjagger@progressrail.com
Primary Facility Contact During Inspection	Tyson Long Regional Environmental Manager 256-505-6125 tlong@progressrail.com
Other Facility Contact(s) During Inspection	

Facility ID			
EPA ID Number	IND006062582	NAICS Code	33651

Facility Status			
File Status	Large Quantity Hazardous Waste Generator	Other Activities	Used Oil Universal Waste Handler

Outstanding Issues	
Last Inspection Date	3/26/2013
Previous Violations	<input type="radio"/> Yes <input checked="" type="radio"/> No
Details	

Inspection Narrative

Prior to this inspection I reviewed the available records.

Progress Rail has occupied this 750,000 square foot facility since 2011. The 450 employees work two 10 hour shifts four days per week to produce 100 locomotives annually. The facility has an air permit, an industrial discharge permit with the City of Muncie and a storm water permit. Since the last IDEM RCRA inspection in 2013 the facility has discontinued use of a coating line thus eliminating a corrosive solid waste stream. The facility will be adding a traction motor line in the near future which will create a new waste stream.

I met Tyson Long, the facility's Environmental Manager, and explained the reason for my inspection. After learning general information about the facility and operations we reviewed the relevant paperwork including; manifests, training records, job descriptions, contingency plans and universal waste receipts. The paperwork was complete and in good order.

After the records review Mr. Tyson conducted me on a walkthrough of the facility. The Waste Room is used as the hazardous waste 90 day storage, used oil and universal waste storage areas. The containers in this area were closed, labeled and arranged with good aisle space. Satellite containers are located in the under frame area and at each paint booth. The satellite containers were closed and labeled. The paint booths are the downdraft type and the filters have been characterized and are disposed of in a solid waste landfill. The housekeeping at the facility was very good.

After the walkthrough we returned to the office to conduct a closing conference. After verbalizing my findings I obtained a signature on the Notice of Inspection.

Regulatory Status			
Observed Activity	Large Quantity Generator	Other Activities	Used Oil Universal Waste Handler
Documents Reviewed	Contingency Plan Manifests LDR Training Records Land Disposal Notification Used oil receipts Universal waste receipts 90 day area inspection log		
Comments			

Waste Management				
Comments:				
Waste Stream(s) Information				
Waste Streams <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Inspected <input type="radio"/> Not Applicable				
List waste stream(s) information that varies from the most recent Annual Report (Example: additional waste streams, waste streams no longer generated, significant increase/decrease in generation rate, etc.)				
EPA Waste Codes	Description	Source	Generation Rate	Disposition
See most recent manifest report				
Exempted/Excluded <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Inspected <input type="radio"/> Not Applicable				
Explanation				
Waste Management Areas				
Container Management Area(s) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable				
EPA Waste Codes	Location	Number	Size	Type of Container
D001 - Ignitable	Waste Room	11	55 gallon	Steel
Oily carpet remnant	Waste Room	1	55 gallon	Plastic
Universal waste batteries	Waste Room	1	5 gallon	Plastic
Used oil	Waste Room	11	55 gallon	Plastic
Used oil	Waste Room	2	5 gallon	Plastic
Used oil	Warehouse	11	55 gallon	Plastic
D001 - Ignitable	Underframe Area	10	Tote	
Satellite Area(s) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable				
EPA Waste Codes	Location	Comments		
D001 - Ignitable	Underframe Area	Aerosol Puncture Station		

D001 - Ignitable	Bogie Paint Booth	Solvent	
D001 - Ignitable	Underframe Paint Booth	Solvent	
D001 - Ignitable	Final Paint	Solvent	
D001 - Ignitable	Final Paint	Aerosol	
D001 - Ignitable	Final Paint	Solvent Rags	
D001 - Ignitable	Paint booth 1	Solvent	
D001 - Ignitable	Paint Booth 3	Solvent Rags	
D001 - Ignitable	Paint booth 3	Solvent	

Tanks, Restricted Waste Sites, and Other Regulated Units

Yes No Not inspected Not applicable

Environmental Releases

Visible Releases/Contamination/Discharges Yes No Release Observed

Compliance Assistance

P2 Information

The following P2 suggestions could possibly save money, reduce waste and/or minimize risk. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff. Please visit the agency's P2 web site at <http://www.in.gov/idem/5298.htm> for additional information.

Contact by IDEM OPPTA Requested Yes No

P2 Suggestions None at this time.

Guidance Materials

Guidance Materials Provided to Facility

**Multi-Media Screening
(Checked box indicates a concern)**

Comments:

Multi-Media Screening Conducted Yes No

Water Concerns

- Process wastewater discharge to a POTW collection system (i.e. sewer) without a permit
- Direct discharge (from industrial process, industrial wastewater treatment or non-contact cooling water) to receiving water near the facility without an NPDES permit
- Process materials such as cleaners, solvents, paints, lubricants, etc. are escaping through floor drains

Air Concerns

- Visible emissions from stacks or vents
- Dust crossing property lines
- Open solvent containers
- Spray booth filters not securely in place
- Open burning

Storm Water Concerns <input type="checkbox"/> NOI for Rule 6 (see applicable SIC codes) <input type="checkbox"/> Storm Water Pollution Prevention Plan (must be developed within 365 days of NOI). <input type="checkbox"/> Storm water annual sample <input type="checkbox"/> Measures to ensure contaminants from industrial activities aren't exposed to storm water <input type="checkbox"/> Documented quarterly inspections of storm water run-off conveyances <input type="checkbox"/> Documented annual employee training on SWP3 <input type="checkbox"/> Rule 5 storm water permit for land disturbing activities greater than 1 acre <input type="checkbox"/> Signs of erosion or off-site sedimentation into waters of the state from construction sites	Drinking Water Concerns <input type="checkbox"/> PWSID# (applies to 25 or more employees on self-supplied drinking water system) <input type="checkbox"/> Contamination within 200 ft of wellhead TRI Concerns <input type="checkbox"/> Lack of TRI report (applies to 10 or more employees in applicable SIC codes) UST Concerns <input type="checkbox"/> Unregistered UST containing petroleum or hazardous substance
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Checklist (Checked box indicates a compliance concern)	
Standards <input type="checkbox"/> Hazardous Waste Determination <input type="checkbox"/> EPA Identification Number(s) <input type="checkbox"/> Manifest General Requirements <input type="checkbox"/> Use of the Manifest <input type="checkbox"/> Biennial Report	Satellite Accumulation – SQG and LQG <input type="checkbox"/> Satellite Accumulation - 55 Gallon <input type="checkbox"/> Satellite Accumulation - Label <input type="checkbox"/> Satellite Containers Closed
Container Management – LQG <input type="checkbox"/> Accumulated On-site for 90 Days or Less <input type="checkbox"/> Hazardous Waste Container Condition <input type="checkbox"/> Hazardous Waste Container Compatibility <input type="checkbox"/> Hazardous Waste Containers Closed <input type="checkbox"/> Hazardous Waste Container Handling <input type="checkbox"/> Hazardous Waste Container Inspections <input type="checkbox"/> Accumulation Start Date Clearly Marked and Visible <input type="checkbox"/> Marked Clearly with Words "Hazardous Waste"	Container Management – SQG <input type="checkbox"/> Accumulate for 180 Days or Less <input type="checkbox"/> May not Exceed 6000 Kg (13,200 Lbs) <input type="checkbox"/> Hazardous Waste Container Condition <input type="checkbox"/> Hazardous Waste Container Compatibility <input type="checkbox"/> Hazardous Waste Containers Closed <input type="checkbox"/> Hazardous Waste Container Handling <input type="checkbox"/> Hazardous Waste Container Inspection <input type="checkbox"/> Accumulation Start Date Clearly Marked and Visible <input type="checkbox"/> Marked Clearly with the Words "Hazardous Waste"
Preparedness and Prevention – LQG and SQG <input type="checkbox"/> Maintained and Operated to Minimize Possibility of a Release <input type="checkbox"/> Required Equipment <input type="checkbox"/> Communication & Alarm Access <input type="checkbox"/> Aisle Space	Contingency Plan and Emergency Procedures – LQG <input type="checkbox"/> Contingency Plan Developed <input type="checkbox"/> Contingency Plan Content <input type="checkbox"/> Contingency Plan Maintained at Facility
Personnel Training – LQG <input type="checkbox"/> Personnel Training	Training and Emergency Procedures – SQG <input type="checkbox"/> SQG Emergency Coordinator <input type="checkbox"/> Emergency Information Posted <input type="checkbox"/> Employee Training

Tank Requirements – LQG <input type="checkbox"/> Integrity Assessment <input type="checkbox"/> Containment and Release Detection <input type="checkbox"/> Tank General Requirements <input type="checkbox"/> Tank Inspections <input type="checkbox"/> Subpart BB - Monthly Pump and Valve Monitoring <input type="checkbox"/> Subpart CC - Annual Inspection/Monitoring	Used Oil – All Facilities <input type="checkbox"/> Rebuttable Presumption Applies <input type="checkbox"/> Containers and Tanks in Good Condition <input type="checkbox"/> Containers/Tank Labeling <input type="checkbox"/> Release Clean Up and Containment <input type="checkbox"/> Burning Restrictions - Generated On-site or Dly, .5M BTU
Additional Requirements – LQG and SQG <input type="checkbox"/> Release to the Environment, Disposal of Solid Waste <input type="checkbox"/> Illegal Dumping <input type="checkbox"/> Land-Ban Notification <input type="checkbox"/> Other Violation	Universal Waste – All Facilities <input type="checkbox"/> Universal Waste Labeling <input type="checkbox"/> Containers - Closed, Good Condition, No Evidence of Leaks <input type="checkbox"/> Universal Waste - Bulb Crushing Prohibition

Description of Violation(s)

Inspection Documentation	
Photographs	<input checked="" type="radio"/> Yes <input type="radio"/> No
Map	<input checked="" type="radio"/> Maps
GPS Location Collected	<input type="radio"/> Yes <input checked="" type="radio"/> No
Analytical Screening Conducted	<input type="radio"/> Yes <input checked="" type="radio"/> No
Lab Sample	<input type="radio"/> Yes <input checked="" type="radio"/> No

Inspection Results/Actions	
Comments:	
Inspection Results	
No Violation(s) Discovered	
Multi-Media Screening Results	
Multi-Media Screening Not Conducted	

Finalize Inspection	
Written Summary of Inspection	
Inspector Information	Printed/Typed Name: Dwayne Caldwell
	Phone Number: (317) 727-4269





	Email Address:	dcaldwel@idem.in.gov
	Signature:	
Facility Representative Signature	Printed/Typed Name:	Tyson Long
	Signature:	Signature obtained on the Notice of Inspection

Photo Table

		Number	1
		Description	Aerosol Recycling
		Photographer	Dwayne Caldwell
		Facility Name	Progress Rail Manufacturing Corporation
		Photo Date	6/7/2016
		Others	N/A
		Number	2
		Description	Label Station
		Photographer	Dwayne Caldwell
		Facility Name	Progress Rail Manufacturing Corporation
		Photo Date	6/7/2016
		Others	N/A
		Number	3
		Description	Satellite Area
		Photographer	Dwayne Caldwell
		Facility Name	Progress Rail Manufacturing Corporation
		Photo Date	6/7/2016
		Others	N/A



	Number	4
	Description	Rag Container
	Photographer	Dwayne Caldwell
	Facility Name	Progress Rail Manufacturing Corporation
	Photo Date	6/7/2016
	Others	N/A



	Number	5
	Description	Spill Kit
	Photographer	Dwayne Caldwell
	Facility Name	Progress Rail Manufacturing Corporation
	Photo Date	6/7/2016
	Others	N/A



	Number	6
	Description	Label
	Photographer	Dwayne Caldwell
	Facility Name	Progress Rail Manufacturing Corporation
	Photo Date	6/7/2016
	Others	N/A



NOTICE OF INSPECTION
State Form 50890 (R3 / 11-05)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603

This is to notify you that on 6/7/16 an inspection of Progress Rail was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- CET Complaint
 Multi-Media Screening Evaluation
 Other _____

Preliminary Inspection/Screening Findings:

These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

Single Media Inspection:

- No violations were discovered with respect to the particular items observed during the inspection.
 Violations were discovered but corrected during the inspection.
 Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
 Violations were discovered and may subject you to an appropriate enforcement response.
 Additional information/review is required to evaluate overall compliance.
 Other / Comments (attachment may be included) _____

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- Multi-media screening not conducted.
 No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
 Potential violations were discovered but corrected during the inspection.
 Potential violations were discovered and may be further investigated.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? Yes No

Compliance Assistance:

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Dwayne Caldwell	<i>Dwayne Caldwell</i>	317 727-4269	6-7-16	In: 9:16 Out: 12:00

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Tyson W. Long	<i>Tyson W. Long</i>	Env. Mgr.	765-281-2706	6/7/16

Christie, Kae

From: Scott Jagger <sjagger@PROGRESSRAIL.com>
Sent: Tuesday, June 14, 2016 11:08 AM
To: Christie, Kae
Subject: RE: Progress Rail Manufacturing Corporation

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

My acknowledgement of receipt. Thanks.

Please let me know if you have any questions.

Regards,

Scott Jagger, CHMM
Global Director – Environmental & Safety
Progress Rail, a Caterpillar Company

From: Christie, Kae [<mailto:KChristie@idem.IN.gov>]
Sent: Tuesday, June 14, 2016 9:40 AM
To: Scott Jagger
Subject: Progress Rail Manufacturing Corporation

Dear Mr. Tyson Long

Please find the attached documents based on an inspection the Indiana Department of Environmental Management, Office of Land Quality, conducted on June 7, 2016, **please confirm you received the documents via-email.**

Thank you

Kae Christie
Administrative Assistant
Department of Environmental Management
Office of Land Quality
IGCN, Rm 1101
317-234-6951
kchristie@idem.in.gov

Christie, Kae

From: Tyson W. Long <tlong@PROGRESSRAIL.com>
Sent: Tuesday, June 14, 2016 10:41 AM
To: Christie, Kae
Cc: sjagger@progressrai.coml; jwilliams@co.delaware.in.us
Subject: Re: Progress Rail Manufacturing Corporation

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

We received. Thank you!

Tyson W. Long
Regional Environmental Manager
Progress Rail Services, A Caterpillar Company
3500 S. Cowan Road
Muncie, Indiana 47302 USA

765-281-2706 office
765-256-1758 mobile
tlong@progressrail.com
www.raildivision.com

On Jun 14, 2016, at 10:31 AM, Christie, Kae <KChristie@idem.IN.gov> wrote:

Dear Mr. Tyson Long

Please find the attached documents based on an inspection the Indiana Department of Environmental Management, Office of Land Quality, conducted on June 7, 2016, **please confirm you received the documents via-email.**

Thank you

Kae Christie
Administrative Assistant
Department of Environmental Management
Office of Land Quality
IGCN, Rm 1101
317-234-6951
kchristie@idem.in.gov

<18 - HW - Progress Rail Manufacturing Corporation - IND006062582 - 6-7-16 - CEI - (Dwayne).pdf>