



## 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](http://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 black ink that reads 'Dwayne Caldwell'.

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				
<b>Waste Streams</b> <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	<input type="radio"/> Yes <input checked="" type="radio"/> 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 <a href="http://www.in.gov/idem/5298.htm">http://www.in.gov/idem/5298.htm</a> for additional information.		
Contact by IDEM OPPTA Requested	<input type="radio"/> Yes <input checked="" type="radio"/> 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	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>Water Concerns</b> <input type="checkbox"/> Process wastewater discharge to a POTW collection system (i.e. sewer) without a permit <input type="checkbox"/> Direct discharge (from industrial process, industrial wastewater treatment or non-contact cooling water) to receiving water near the facility without an NPDES permit <input type="checkbox"/> Process materials such as cleaners, solvents, paints, lubricants, etc. are escaping through floor drains	<b>Air Concerns</b> <input type="checkbox"/> Visible emissions from stacks or vents <input type="checkbox"/> Dust crossing property lines <input type="checkbox"/> Open solvent containers <input type="checkbox"/> Spray booth filters not securely in place <input type="checkbox"/> Open burning



<b>Storm Water Concerns</b> <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	<b>Drinking Water Concerns</b> <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  <b>TRI Concerns</b> <input type="checkbox"/> Lack of TRI report (applies to 10 or more employees in applicable SIC codes)  <b>UST Concerns</b> <input type="checkbox"/> Unregistered UST containing petroleum or hazardous substance
---	--

<b>Checklist</b> (Checked box indicates a compliance concern)	
<b>Standards</b> <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	<b>Satellite Accumulation – SQG and LQG</b> <input type="checkbox"/> Satellite Accumulation - 55 Gallon <input type="checkbox"/> Satellite Accumulation - Label <input type="checkbox"/> Satellite Containers Closed
<b>Container Management – LQG</b> <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"	<b>Container Management – SQG</b> <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"
<b>Preparedness and Prevention – LQG and SQG</b> <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	<b>Contingency Plan and Emergency Procedures – LQG</b> <input type="checkbox"/> Contingency Plan Developed <input type="checkbox"/> Contingency Plan Content <input type="checkbox"/> Contingency Plan Maintained at Facility
<b>Personnel Training – LQG</b> <input type="checkbox"/> Personnel Training	<b>Training and Emergency Procedures – SQG</b> <input type="checkbox"/> SQG Emergency Coordinator <input type="checkbox"/> Emergency Information Posted <input type="checkbox"/> Employee Training


<b>Tank Requirements – LQG</b> <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	<b>Used Oil – All Facilities</b> <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
<b>Additional Requirements – LQG and SQG</b> <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	<b>Universal Waste – All Facilities</b> <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:
<b>Inspection Results</b>
No Violation(s) Discovered
<b>Multi-Media Screening Results</b>
Multi-Media Screening Not Conducted

Finalize Inspection		
<b>Written Summary of Inspection</b>		
<b>Inspector Information</b>	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

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





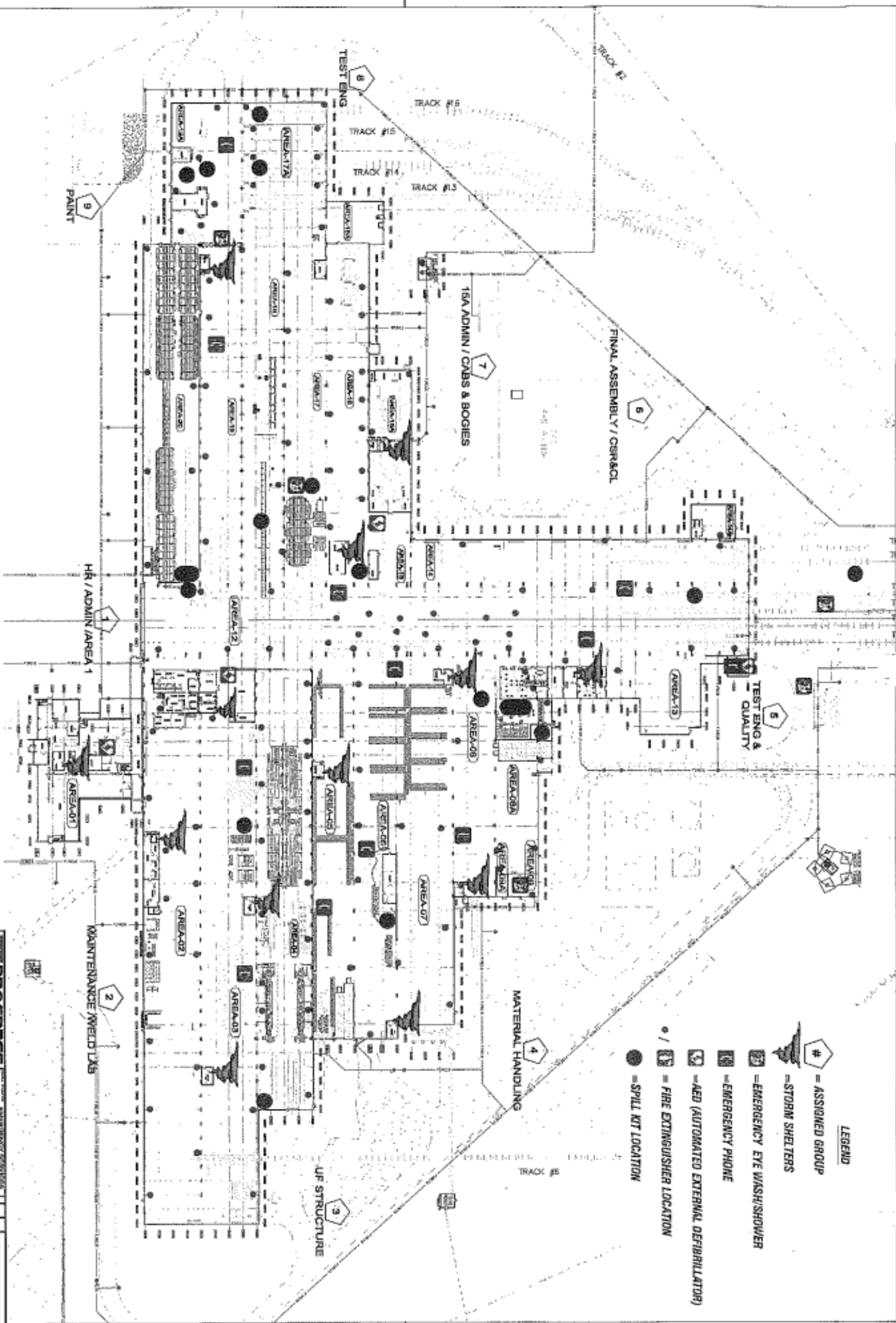
Number	4
Description	Rag Container
Photographer	Dwayne Caldwell
Facility Name	Progress Rail Manufacturing Corporation
Photo Date	6/7/2016
Others	N/A



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



**LEGEND**

- # = ASSIGNED GROUP
- ☒ = STORM SHELTERS
- ☒ = EMERGENCY EYE WASH/SHOWER
- ☒ = EMERGENCY PHONE
- ☒ = AED (AUTOMATED EXTERNAL DEFIBRILLATOR)
- ☒ = FIRE EXTINGUISHER LOCATION
- ☒ = SPILL KIT LOCATION

**PROGRESS**

MAIL SERVICES

8500 David Green Road

Atlanta, GA 30328

INTERNAL USE ONLY



**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):**

- ☒ CEI ☐ 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/](http://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](http://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		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		Env. Mgr.	765-281-2706	6/7/16

## Christie, Kae

---

**From:** Scott Jagger <[sjagger@PROGRESSRAIL.com](mailto: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](mailto:kchristie@idem.in.gov)



## Christie, Kae

---

**From:** Tyson W. Long <[tlong@PROGRESSRAIL.com](mailto:tlong@PROGRESSRAIL.com)>  
**Sent:** Tuesday, June 14, 2016 10:41 AM  
**To:** Christie, Kae  
**Cc:** [sjagger@progressrai.com](mailto:sjagger@progressrai.com); [jwilliams@co.delaware.in.us](mailto: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](mailto:tlong@progressrail.com)  
[www.raildivision.com](http://www.raildivision.com)

On Jun 14, 2016, at 10:31 AM, Christie, Kae <[KChristie@idem.IN.gov](mailto: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](mailto:kchristie@idem.in.gov)

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