



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

November 30, 2023

Mr. Chad Coy
Paramount Global (f/k/a ViacomCBS Inc.)
20 Stanwix Street, 10th Floor
Pittsburgh, PA 15222-1353

Transmitted via Email

Mr. Scott Jagger
Progress Rail Manufacturing Corporation
1605 Progress Drive P.O. Box 1037
Albertville, AL 35950

Mr. Arie de Jong
Arizona Maricopa Associates, L.L.C.
807 East Mission Road
San Marcos, CA 92069

Mr. Donell Jackson
ABB, Inc.
45 Griffin Rd. South
Bloomfield, CT 06002

Re: Response to IDEM Comments (May 23, 2023) & Revised Remediation Work Plan Archery
Field Area
Progress Rail Facility
3500 S. Cowan Road
Muncie, IN 47302
VRP #6210301

Dear Messrs. Coy, Jagger, de Jong, and Jackson:

The Indiana Department of Environmental Management (IDEM) and the United States Environmental Protection Agency (U.S. EPA) have reviewed the Response to IDEM Comments (May 23, 2023) & Revised Remediation Work Plan Archery Field Area (PSARA Technologies, Inc. [PSARA], July 28, 2023) for the Progress Rail Facility located at 3500 S. Cowan Road in Muncie, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document #83512566. Further site history can be found in the VFC located on the IDEM website vfc.idem.in.gov. This technical letter contains a brief background summary based upon information contained with IDEM's files, including comments generated during IDEM's joint review of the above mentioned report with U.S. EPA.



Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



Background

The site is located in the southwest portion of Muncie, Indiana and occupies approximately 300 acres, with 750,000 square feet of building space under roof. The area surrounding the site consists primarily of light industrial facilities, a golf course, and undeveloped land. The initial facility was constructed in 1961 for the purposes of manufacturing of high-voltage-capacity, large-scale power transformers as well as the repair/rebuilding of shell-type transformers. According to facility representatives, newly constructed transformers were historically filled with mineral oil. The use of fluids containing polychlorinated biphenyls (PCBs) in transformer manufacturing operations at this plant was limited to non-contact heat transfer fluids, which use ended in 1982.

Where the property has not been developed, it is mostly grass-covered and relatively level with a slight slope to the east. Surface water follows the topography of the site and drains to the east by a series of storm water ditches toward an unnamed tributary of Buck Creek. Two main ditches flowing eastward bound the main Site operations to the north and south. Additionally, along the west side of the plant, surface drainage flows to the west-northwest toward a grassy swale (Cowan Road Ditch) that eventually drains into Buck Creek to the north.

Paramount's predecessor, Westinghouse, operated the plant until February 1989, when joint operations began with ABB, Inc. (ABB). The joint operation continued until December 1989, when ABB purchased the plant from Westinghouse and became the sole operator. Manufacturing operations continued through a majority of the 1990s and ceased in the latter part of 1998. Most of the machinery and equipment was dismantled and removed from the property during 1999.

The Site was acquired from ABB by Commercial Development Corporation in 2002, which leased the property to various tenants for warehousing cans for use in the packaging of tomato-based products until 2006. In 2007, the property was acquired by Arizona Maricopa Associates, LLC (AMA), a real estate investment company. In 2010, the property was leased to Progress Rail Manufacturing Corporation (PRMC), who has modified the plant for the purpose of manufacturing locomotives.

The former Archery Field Area is currently being addressed as a soil cleanup under the United States Environmental Protection Agency's (U.S. EPA's) Toxic Substance Control Act (TSCA) as well as IDEM's Voluntary Remediation Program (VRP) as part of VRP Project #6210301. The subject area is located east of the plant within the area of the new railroad test tracks developed by PRMC. The area consists of tall grasslands, a small wooded area, and a drainage ditch that appears to have historically carried more water than at present. Prior to development of the test tracks, the ditch flowed north to meet the site ditch network, which then curved east to drain into Buck Creek. Evidence of past releases of PCBs in the area were identified in two previous investigations:

1. During a site perimeter investigation completed by PSARA in 1991, a soil sample collected from a piezometer soil boring (PZ-17) exhibited a PCB concentration of 56 parts per million (ppm).
2. In 2010, a Phase II environmental site assessment was completed by LP Environmental as part of the transition of occupancy to PRMC. Several soil borings were advanced in the subject area based on the 1991 investigation findings as well as other suspect debris near the drainage ditch. The investigation found shallow soil contamination as high 260,000

ppm of PCBs as well as evidence of downstream migration of PCBs within the drainage ditch sediments.

Subsequent delineation sampling was performed in 2013, and a TSCA work plan for soil remediation was presented to both U.S. EPA and IDEM for review in the Archery Field Area RWP dated October 13, 2022. U.S. EPA and IDEM responded to the RWP on May 23, 2023, and, in turn, a Revised RWP and Response to Comments document was submitted by PSARA on July 28, 2023. Comments generated during review of the Archery Field Area Revised RWP and Response to Comments document by IDEM and U.S. EPA are summarized below.

Comments

1. Rejoinder to Response to Comment #6: PSARA proposed a cleanup goal of 1 ppm PCBs in the ditch and 25 ppm PCBs outside of the ditch. However, since the hotspot area lies adjacent to the ditch in question, IDEM and U.S. EPA requested that the hot spot be remediated to a 1 ppm goal to minimize future PCB contamination migration into the ditch from the hot spot. PSARA responded that most of the hot spot area is in a flat plain four feet in elevation above the stream channel and is not associated with the drainage ditch. Therefore, hot spot area grids extending into the banks of the drainage ditch will be excavated to the 1 ppm standard. For hot spot grids that represent the channel banks, a 1 ppm standard will be applied until the excavation reaches a depth of four feet. If contamination in the grids is found to extend to depths exceeding four feet below ground surface (bgs), the 25 ppm PCB standard will be utilized, as PSARA postulates that four feet of compacted clean clay backfill will provide more-than-adequate protection for the streambed. This is acceptable. However, an Environmental Restrictive Covenant (ERC) Modification will be necessary prior to site closure if contamination is found to exceed four feet bgs in the hot spot area in order to define the location and concentrations of PCBs that will remain.
2. Rejoinder to Response to Comment #8: PSARA has proposed that for grids requiring excavation deeper than two feet bgs, one composite sample will be collected from each sidewall of the grid. Sidewall samples will be collected by compositing material from nine equally-spaced locations across the sidewall. Section 2.1.1 of the SAP has been revised to include this procedure. This is acceptable.
3. All other comment responses by the consultant are acceptable.
4. The Quality Assurance Project Plan (QAPP) is missing the acceptance criteria for the continuing calibration verification and Quality Assurance/Quality Control (QA/QC) samples. The QAPP must be revised accordingly.
5. Section 1.0 of the Revised RWP states: "Paramount (f/k/a ViacomCBS) intends to conduct a self-directed soil cleanup under the USEPA Toxic Substances Control Act (TSCA) program in accordance with 40 CFR 761.61(c) for the archery field area." Please note that 761.61(c) is not a self-directed cleanup as it requires U.S. EPA approval prior to conducting the remedial activities. Once IDEM approves the RWP for the Archery Field Area, please submit the final copy to U.S. EPA with a request for approval under 761.61(c) or under the TSCA Coordinated Approval provisions at 761.77.

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Within 60 days from the receipt of this letter, please submit an Addendum to the Revised RWP to address these comments. If you have any questions, please contact me at (317) 233-7089, (800) 451-6027, or at MNance@idem.IN.gov.

Sincerely,



Mark A. Nance,
Senior Environmental Manager
Voluntary Remediation Program
Office of Land Quality

cc: Mr. Michael O'Connell, PSARA Technologies, Inc.
Mr. Michael Hessling, PSARA Technologies, Inc.
Mr. David Gillay, Barnes & Thornburg LLP
Mr. Peter Ramanauskas, U.S. EPA, Region 5
Mr. John Steketee, U.S. EPA, Region 5
Ms. Julie Lang, IDEM, Office of Legal Counsel
Mr. George Ritchotte, IDEM, Office of Land Quality
Mr. Don Stilz, IDEM, Hazardous Waste Permit Section
Mr. Chris Myer, IDEM, Hazardous Waste Permit Section

It is the goal of IDEM to enable remediation sites to move forward in a timely manner. If an impasse has been reached over technical issues, a Technical Review Panel of non OLQ scientists is available to review and offer a non-binding opinion to help resolve technical disagreements with the VRP and State Cleanup Program project managers. The goal is to facilitate progress at your site. This review process is available immediately. If you would like to request a review by the Panel, please contact Kevin Davis, Remediation Services Branch Chief for the Office of Land Quality, at 317-232-4535 or kdavis2@idem.in.gov.

Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC §4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).