



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

January 9, 2025

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: Sediment Sampling Work Plan
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), in coordination with the United States Environmental Protection Agency (USEPA), has reviewed the Sediment Sampling Work Plan (PSARA Technologies, Inc. [PSARA], October 9, 2024) 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 #83709191. 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 and rejoinders generated during review of the above mentioned response document.

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-



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We appreciate your input!



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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.

In 2021, Voluntary Remediation Program (VRP) Project #6210301 was established to address remaining Areas of Concern (AOCs), Solid Waste Management Units (SWMUs), and other previously identified contaminated areas that are not currently being addressed by prior or ongoing remediation projects. PSARA asserts that the following areas require no additional investigation based on previous evaluation or are addressed under separate cleanup projects.

1. AOC 2, AOC 3, and SWMU 4 are currently being addressed by the combined active VRP Projects #6000407 and #6000408.
2. SWMU 1 was a former hazardous waste drum storage site that was addressed by the 2015 asphalt area remediation project. The remediation report (VFC document #80251827) has been submitted to USEPA, Region 5's Toxic Substances Control Act (TSCA) program for review as well as IDEM.
3. SWMU 5 and SWMU 11 consisted of three satellite waste accumulation areas inside the main building and within the footprint of the former Vapotherm operations. Previous research as well as IDEM's review of the 2015 Resource Conservation and Recovery Act (RCRA) summary concluded that no additional investigation work in these areas is necessary.

Following execution of the Voluntary Remediation Agreement for VRP #6210301, IDEM received a Site Investigation Work Plan on February 18, 2022. IDEM responded to the Site Investigation Work Plan on June 21, 2022, and a response to IDEM's comments was provided for review on August 18, 2022. The comment responses were found to be acceptable, and IDEM approved the amended Site Investigation Work Plan on September 8, 2022.

The amended Site Investigation Work Plan was initially implemented in the Fall of 2022, followed by additional shallow soil sampling in March 2023. The results of the investigation activities were presented in a Site Characterization Report dated April 7, 2023. IDEM responded to the Site Characterization Report in letter dated August 11, 2023. Comment responses and rejoinders were then exchanged between PSARA and IDEM, in coordination with USEPA, in five separate documents dated November 8, 2023, February 9, 2024, May 8, 2024, August 9, 2024, and September 25, 2024. Specifically, in the February 9, 2024 letter issued by IDEM in coordination with USEPA, additional characterization of PCB contamination in South Ditch sediments was requested. In response, PSARA submitted a Sediment Sampling Work Plan dated October 9, 2024. IDEM, in coordination with the USEPA, have prepared the following comments on the Work Plan.

Comments

1. Per Section 2.1 of the Work Plan, PSARA plans to divide the ditch sampling area into four segments of 50 feet in the vicinity of historical sample location S2370. The 50-foot segments will then be subdivided into five sub-grids, ten feet in length. An aliquot from each sub-grid will be composited into a single sample for each 50-foot segment.

Since the goal of this sampling event is to delineate the nature and extent of PCB contamination in the South Ditch for future remedial action, IDEM, in coordination with USEPA, requests that grab samples be collected at ten-foot intervals and submitted for laboratory analysis, rather than composite samples within 50-foot segments.

2. The level of laboratory quality assurance/quality control (QA/QC) documentation was not specified in Section 3.5 of the Work Plan. Per Section 2.2.9 of the Risk-based Closure Guide (R2), IDEM requires Level II QA/QC elements at a minimum. Please update Section 3.5 of the Work Plan accordingly.

Within 60 days from receipt of this letter, please revise the Sediment Sampling Work Plan as described in the comments above. 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, USEPA, Region 5
Mr. John Steketee, USEPA, Region 5
Mr. Tyler Jacobs, USEPA, Region 5
Ms. Julie Lang, IDEM, Office of Legal Counsel

Mr. George Ritchotte, IDEM, Office of Land Quality
Mr. Don Stiliz, 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).