



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-5027 • (317) 232-8603 • Fax (317) 233-6647 • [www.idem.in.gov](http://www.idem.in.gov)

Mike Braun  
Governor

Clint Woods  
Commissioner

April 24, 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: Response to IDEM Comments (January 9, 2025)  
Site Characterization Report  
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 Response to IDEM Comments (January 9, 2025) Site Characterization Report (PSARA Technologies, Inc. [PSARA], January 28, 2025) 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 #83756366. Further site history can be found in the VFC located on the IDEM website [vfc.idem.in.gov](http://vfc.idem.in.gov). This technical letter contains a brief background summary based upon information contained with IDEM's files and comments 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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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 seven separate documents dated November 8, 2023, February 9, 2024, May 8, 2024, August 9, 2024, and September 25, 2024, December 18, 2024, and January 9, 2025. Specifically, in the January 9, 2025 letter issued by IDEM in coordination with USEPA, installation of an additional monitoring well in SWMU 2 was requested to refine the extents of light non-aqueous phase liquid (LNAPL) and the PCB groundwater plume. In response, PSARA submitted a response document titled Response to IDEM Comments (January 9, 2025) Site Characterization Report dated January 28, 2025. IDEM, in coordination with the USEPA, have prepared the following rejoinder.

Rejoinder to Comment Response #3:

In the context of the lines-of-evidence presented by PSARA, IDEM, in coordination with USEPA, reviewed the potentiometric surface map presented in Attachment A of the September 25, 2024 response document. The potentiometric surface in the vicinity of SWMU 2 is relatively flat with contour lines presented at 0.01-foot intervals. Based on the relatively flat groundwater surface and variable groundwater flow directions (southeast, north, northeast), it appears there are no wells present north of well MW-8 or southeast between well MW-7 and piezometer PZ-3. As a result, it is unclear how the LNAPL extents around well MW-8 were determined, since the closest wells are at least 50 feet from MW-8, and no wells are directly north or southeast. Therefore, there appears to be a lack of control on LNAPL extents based on well locations.

IDEM, in coordination with USEPA, requests that the consultant resurvey the monitoring wells/piezometers in the vicinity of SWMU 2 and check depths to bottom for these sampling points to determine if the wells are collecting silt which can adversely affect potentiometric surface data. If the potentiometric surface remains similar to historical datasets after resurveying (and redevelopment if silt accumulation is discovered), then the previously requested additional monitoring well may still be necessary.

Within 60 days from receipt of this letter, please resurvey the monitoring wells and piezometers in the vicinity of SWMU 2 and check depths to bottom of these sampling points. Additionally, please redevelop any monitoring well or piezometer with probable silt accumulation. After resurveying and potential redevelopment, please gauge depth to water and LNAPL thickness for all sampling points in the vicinity of SWMU2 and submit tabulated results with a potentiometric surface map.

If you have any questions, please contact me at (317) 233-7089, (800) 451-6027, or at email 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. 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](mailto: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).