



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

August 20, 2020

From: X 
Douglas Ballotti, Director
Superfund & Emergency Management Division
Signed by: DOUGLAS BALLOTTI

To: Kurt Thiede
Regional Administrator

Subject: Recommendation for Approval of the Responsiveness Summary Addressing Public Comments on the Notice of Intent for Partial Deletion of the Douglas Road/Uniroyal, Inc. Landfill Superfund Site from the National Priorities List

I recommend you approve the attached Responsiveness Summary Addressing Public Comments on the Notice of Intent for Partial Deletion of the Douglas Road/Uniroyal, Inc. Landfill Superfund Site (Douglas Road Site or Site), located in Mishawaka, Indiana from the National Priorities List (NPL).

EPA prepared this Responsiveness Summary to provide a response to comments submitted to EPA during the 30-day public comment period regarding EPA's notice to partially delete the Operable Unit 1 (OU1) Landfill Cap Area of the Site from the NPL, which was published in the *Federal Register* on June 23, 2020 (85 FR 37617). The Operable Unit 2 (OU2) groundwater portion of the Site is not being considered for deletion as part of this action and will remain on the NPL. The closing date for comments on the Notice of Intent for Partial Deletion was July 23, 2020

EPA received comments from two people during the public comment period, including one that submitted property ownership records for OU1 and one who requested that their well water be tested. EPA also received comments from the City of Mishawaka (City). A second resident contacted the Indiana Department of Environmental Management (IDEM) and requested that his well water also be tested. EPA did not receive any telephone inquiries about the Site during the public comment period.

The two residents requesting well testing live downgradient of the Site and were concerned that the Site is contaminating their well water and the adjacent lake. Although previous sampling indicated that the contamination did not extend to this area and EPA and IDEM did not expect the residential wells to be contaminated, the St. Joseph County Health Department (Health Department) contacted the residents and offered to sample their wells for arsenic. One resident allowed the Health Department to sample his well and arsenic was not detected in the resident's well water. Also, as previously indicated, the OU2 groundwater portion of the Site was not proposed for deletion and will remain on the NPL.

The City of Mishawaka was concerned that deleting the Landfill Cap Area portion of the Site from the NPL meant that the landfill gas control system would be shut down (it will not). The City also wanted to confirm that given the remaining levels of groundwater contamination at the Site, all future development in the area will need to remain on municipal water. EPA contacted the City immediately to discuss the City's concerns. EPA explained that the active landfill gas control system at the Site, as well as other operation and maintenance, monitoring, and statutory five-year reviews would continue for the Landfill Cap Area even if OU1 was deleted. EPA explained that the groundwater portion of the Site would remain on the NPL and confirmed that groundwater use in the area would continue to be regulated by the County Health Department's Administrative Control Area (ACA) established under County Code Chapter 52, Section 52.043. EPA also emailed additional reports and information to the City about the Site

The submitter of the OU1 property ownership records merely requested that the property records be added to the Site file.

Because the comments EPA received during the public comment period do not actually pertain to the technical or administrative merits of EPA's proposed partial deletion of the Douglas Road Site, they are not considered adverse and I recommend that we proceed with the partial deletion in HQ September 2020 NPL Deletions Update.

Please indicate your approval or disapproval of the Responsiveness Summary below, and feel free to contact me if you have any questions. Upon your approval, the Responsiveness Summary will be placed into the Deletion Docket and EPA's Site records and sent to IDEM, the Health Department, the City, and the other commenters.

Attachment:

1. Responsiveness Summary Addressing Public Comments on the Notice of Intent for Partial Deletion of the Douglas Road/Uniroyal, Inc. Landfill Superfund Site from the National Priorities List, August 2020.

Approve: _____
Kurt Thiede
Regional Administrator
Date

Disapprove: _____
Kurt Thiede
Regional Administrator
Date

RESPONSIVENESS SUMMARY
ADDRESSING PUBLIC COMMENTS ON THE
NOTICE OF INTENT FOR PARTIAL DELETION OF THE
DOUGLAS ROAD/UNIROYAL, INC. LANDFILL SUPERFUND SITE
MISHAWAKA, INDIANA
FROM THE NATIONAL PRIORITIES LIST
August 2020

INTRODUCTION

EPA published a Notice of Intent for Partial Deletion of the Douglas Road/Uniroyal, Inc. Landfill Superfund Site (Douglas Road Site or Site), located in Mishawaka, Indiana from the National Priorities List (NPL) in the *Federal Register* on June 23, 2020 (85 FR 37617). EPA's publication of this notice was intended to inform the public that EPA planned to delete the Operable Unit 1 (OU1) Landfill Cap Area of the Site from the NPL and to provide a 30-day public comment period on the proposed partial deletion.

EPA is proposing to delete OU1 of the Site from the NPL because EPA and the State of Indiana, through the Indiana Department of Environmental Management (IDEM), determined that all appropriate response actions under CERCLA, other than operation and maintenance (O&M), monitoring, and five-year reviews (FYRs), have been completed for OU1. The Operable Unit 2 (OU2) groundwater portion of the Site will remain on the NPL and is not being considered for deletion as part of this action. The closing date for comments on the Notice of Intent for Partial Deletion was July 23, 2020.

EPA prepared this Responsiveness Summary to provide a response to the comments submitted to EPA during the 30-day public comment period regarding the Notice of Intent for Partial Deletion of the Site. The comments are summarized below. The original comments are attached to this Responsiveness Summary, which is available at <https://www.regulations.gov>, Docket ID EPA-HQ-SFUND-1989-0008 and on EPA's webpage for the Site at <https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0501696&doc=Y&colid=39560®ion=05&type=SC>.

RESPONSIVENESS SUMMARY

EPA received comments from two people during the public comment period, including one that submitted property ownership records for OU1 and a resident who requested well testing, plus comments from the City of Mishawaka (City) (*see* Attachments 3 to 5). A second resident contacted IDEM and requested that his well water also be tested. EPA did not receive any telephone inquiries about the Site during the public comment period.

Two of the commenters live in the Juday Lake subdivision downgradient of the Site and were concerned that the Site is contaminating their well water and Juday Lake. The

submitter of the OU1 property ownership records requested that the property records be added to the Site file.

The City was concerned that deleting the Landfill Cap Area portion of the Site from the NPL meant that the landfill gas control system would be shut down (it will not). The City also wanted to confirm that given the remaining levels of groundwater contamination at the Site, all future development in the area will need to remain on municipal water supplied by the cities of Mishawaka and South Bend.

EPA contacted the resident who submitted the public comment to EPA on June 30, 2020 and began working with IDEM and the St. Joseph County Health Department (Health Department) to address both residents' concerns with their well water. IDEM sent emails to both residents on July 2, 2020, with additional information to explain why IDEM and EPA do not expect the residents' wells to be impacted by the Site (*see* response below). On July 15, 2020, the Health Department contacted the residents and offered to test the two residents' wells for arsenic and is working on getting a discount for other homeowners who may want to get their water tested.

The Health Department tested the well of the resident who contacted IDEM on August 5, 2020. The Health Department reported that arsenic was not detected in the resident's well above the laboratory's minimum detection limit of 4 micrograms per liter ($\mu\text{g/l}$) (NOTE: the federal drinking water standard for arsenic is 10 $\mu\text{g/l}$). The Health Department made several attempts to contact the resident who submitted the public comment to EPA to schedule the testing of her well. However, these attempts have been unsuccessful and it is not clear if the resident still wants her well water tested.

EPA called Mr. Kenneth Prince, the City Planner who submitted the City's comments on behalf of the Mayor, on July 23, 2020. EPA explained that the active landfill gas control system at the Site, as well as other O&M, monitoring, and FYRs would continue for the Landfill Cap Area of the Site even if OU1 was deleted. EPA explained that methane concentrations in the landfill gas monitoring wells around the perimeter of the landfill during the last quarterly sampling event remained at zero percent, indicating that no landfill gas is migrating beyond the Site perimeter. EPA explained that the groundwater portion of the Site would remain on the NPL and confirmed that groundwater use in the area would continue to be regulated by the County Health Department's Administrative Control Area (ACA) established under County Code Chapter 52, Section 52.043. EPA provided additional reports and information to the City about the Site in subsequent emails on July 23, 2020 and July 28, 2020.

EPA called the commenter who submitted the OU1 property information on July 29, 2020, to request further clarification on the intent of the commenter's submission. The commenter clarified that he was requesting to have the property records added to the Site file and no other additional response was needed. EPA sent a follow-up email to the commenter on July 29, 2020 confirming this and asking the commenter to let EPA know if there was anything else the commenter wanted EPA to do with the records. EPA's email also explained to the commenter that as long as IDEM and EPA have access to the

Site and property owners comply with the Environmental Covenants, EPA does not get involved in private property transactions. EPA did not receive any response to this email.

Copies of the public comments are attached to this Responsiveness Summary and are summarized below. This Responsiveness Summary, along with documents that support the deletion, are available at <https://www.regulations.gov>, Docket ID EPA-HQ-SFUND-1989-0008 and on EPA's webpage for the Site at <https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0501696&doc=Y&colid=39560®ion=05&type=SC>. A copy of this Responsiveness Summary will also be sent to IDEM, the County Health Department, the City of Mishawaka, and the three other commenters. EPA carefully considered all comments in consultation with the IDEM before making its final decision to move forward with deleting the OU1 – Landfill Cap Area of the Douglas Road Site from the NPL.

SUMMARY OF COMMENTS

Residential Comments - A resident living approximately one mile downgradient of the Site in the Juday Lake subdivision commented that she is concerned that the Site poses a threat to her well and the lake and requested that her well water be tested (*see* Attachment 3). The resident would like the landfill to be removed, not just capped or stated to be no longer a threat. The resident considers the landfill to be an eyesore and stated that her neighborhood was wondering if they were going to be connected to city water. A second resident living in the same neighborhood contacted IDEM and requested that his well be tested.

EPA Response - EPA and IDEM selected and implemented the cleanup remedy for the Douglas Road Site in accordance with applicable laws and regulations and public participation requirements over twenty years ago (*see* the July 13, 1995 and May 3, 1996 Records of Decision and the September 19, 2000 Preliminary Close Out Report which are available in the Deletion Docket). The cleanup included constructing a low-permeability, multi-layer cap with an active landfill gas control system over the landfill portion of the Site (OU1); fifteen years of on-Site and off-Site groundwater extraction and treatment conducted from 2000 to 2015 (OU2); and land and groundwater use restrictions. The selected remedy did not include the removal and relocation of the landfill contents. From 1994 to 1996, EPA also connected approximately 95 residents located in areas with groundwater contamination to the municipal water supply as part of a time-critical removal action.

EPA's proposed partial deletion pertains to the OU1 – Landfill Cap Area portion of the Site. EPA is not considering the groundwater portion of the Site (OU2) for deletion at this time. The OU2 groundwater portion of the Site will remain on the NPL.

The OU1 Landfill Cap Area is vacant and covered with a grassy vegetative covering. IDEM's contractor inspects the Site quarterly and maintains the landfill cap (including trash removal), the vegetative covering, landfill gas control system, and fence as needed. EPA conducted FYRs of the Site in 2002, 2007, 2012, and 2017. EPA's latest FYR

Report for the Site in 2017 found that the landfill cap and other OU1 remedial components continue to protect human health and the environment. Copies of the O&M Reports and all FYR Reports for the Site are available in the Deletion Docket.

EPA did not connect residents in the Juday Lake subdivision to municipal water because EPA's sampling during the remedial investigation, including residential well sampling in the Juday Lakes subdivision, indicated that the groundwater contamination from the Site did not extend to Juday Creek or the Juday Lake subdivision. As part of the groundwater cleanup for the Site, EPA and IDEM installed a groundwater extraction system and pumped and treated contaminated groundwater from the aquifer for over 15 years (from 2000 to 2015).

Recent groundwater monitoring at the Site has detected intermittent concentrations of arsenic above the federal drinking water standard in two shallow groundwater monitoring wells located approximately one-half mile downgradient of the Site and 1,000 feet from the Juday Lake subdivision (MW-15S and MW-16S). Because arsenic is both a naturally occurring compound in the area and a Site-related contaminant, it is not clear if the arsenic is due to Site-related conditions. IDEM and EPA will continue to monitor the levels of arsenic in the groundwater to evaluate whether the concentrations of arsenic are Site-related and whether any additional actions are warranted.

Groundwater use at the Site and in the surrounding area including the Juday Lake subdivision is regulated by the County Health Department's ACA established under County Code Chapter 52, Section 52.043 (*see* Figure in Attachment 1). The commenter's well is also significantly deeper than the arsenic detected in the shallow groundwater monitoring wells (approximately 140 to 145 feet deep) and is not expected to be impacted by Site-related contamination. Nonetheless, the County Health Department contacted both residents who requested well testing and offered to sample their wells for arsenic. One resident allowed the Health Department to sample their well. Arsenic was not detected in the resident's well above the laboratory's minimum detection limit of 4 µg/l (*see* Attachment 2).

City of Mishawaka Comments – The City's primary (mistaken) concern was that the landfill gas control system at the Site would be shut down if OU1 was deleted from the NPL and that the high levels of methane detected in the landfill gas ("LG") wells would pose an imminent hazard to public safety (*see* Attachment 4). The City also noted that the April 27, 2020 O&M Report for the Site indicated that a few chemicals were detected in groundwater above remedial goals or drinking water standards and wanted to confirm that future development in the area would be required to connect to municipal water. The City also indicated that the actual groundwater data was not included in the April 27, 2020 report and attached a copy of the report to their comment.

EPA Response – IDEM will continue to operate and monitor the active landfill gas control system at the Douglas Road Site in accordance with the February 25, 2010 Landfill Gas Monitoring Plan and the September 12, 2016 Sampling and Analysis Plan until the methane is no longer a threat - even if this portion of the Site is deleted from the

NPL. These reports, as well as a description of the landfill gas control system, which can be found in the January 2003 Long-Term Remedial Action 2002 Performance Report, are available in the Deletion Docket. Also, methane concentrations in the compliance monitoring wells located around the perimeter of the landfill gas control system during the last quarterly sampling event in January 2020 (the “GM” wells) remained at 0%, indicating that no landfill gas is migrating beyond the Site perimeter. The LG wells noted in the City’s comments are located within the landfill gas control system and IDEM and EPA routinely monitor those wells to evaluate trends in the gas generation rate and to aid in determining if adjustments are needed in the blower system or vent wells to maximize gas removal and capture. These wells contain methane because they are part of the gas control system and demonstrate that the system is effective. (See the April 27, 2020 O&M Report, which is available in the Deletion Docket for additional information.)

O&M, monitoring, and FYRs are not considered to be response actions under Superfund law. Therefore, sites with these types of ongoing activities are still eligible for deletion. Also, as indicated in 40 CFR 300.425(e)(3) of the National Oil and Hazardous Substances Pollution Contingency Plan, sites or portions of sites deleted from the NPL remain eligible for Fund-financed remedial actions if future conditions warrant such actions.

EPA’s proposed partial deletion does not pertain to the OU2 - Groundwater portion of the Site. Groundwater monitoring conducted after the groundwater extraction system was shut down found intermittent detections of arsenic at a few locations above the drinking water standard which may or may not be Site-related. Groundwater use at these locations and in the entire area surrounding the Site is regulated by the County Health Department’s ACA established under County Code Chapter 52, Section 52.043 (see attached Figure and <https://www.sjcindiana.com/DocumentCenter/View/19694/County-Code-52-Water-Regulations>). IDEM will continue to conduct groundwater monitoring at the Site until the groundwater data demonstrates that the Site meets EPA’s criteria for full site completion and the remaining portions of the Site (OU2) can be proposed for deletion. A copy of the most recent groundwater data is available in the December 16, 2019 Annual Groundwater Sampling Report, which EPA provided to the City on July 28, 2020. A copy of this report is also available in the Deletion Docket for the Site.

Comment Transmitting Property Records – A comment was submitted on Regulations.gov with property records and maps for the OU1 (see Attachment 5). The comment stated: “OU1 owner records on file July 2020.” Further clarification from the commenter indicated that the commenter was requesting that these records be added to the Deletion Docket and the Site files.

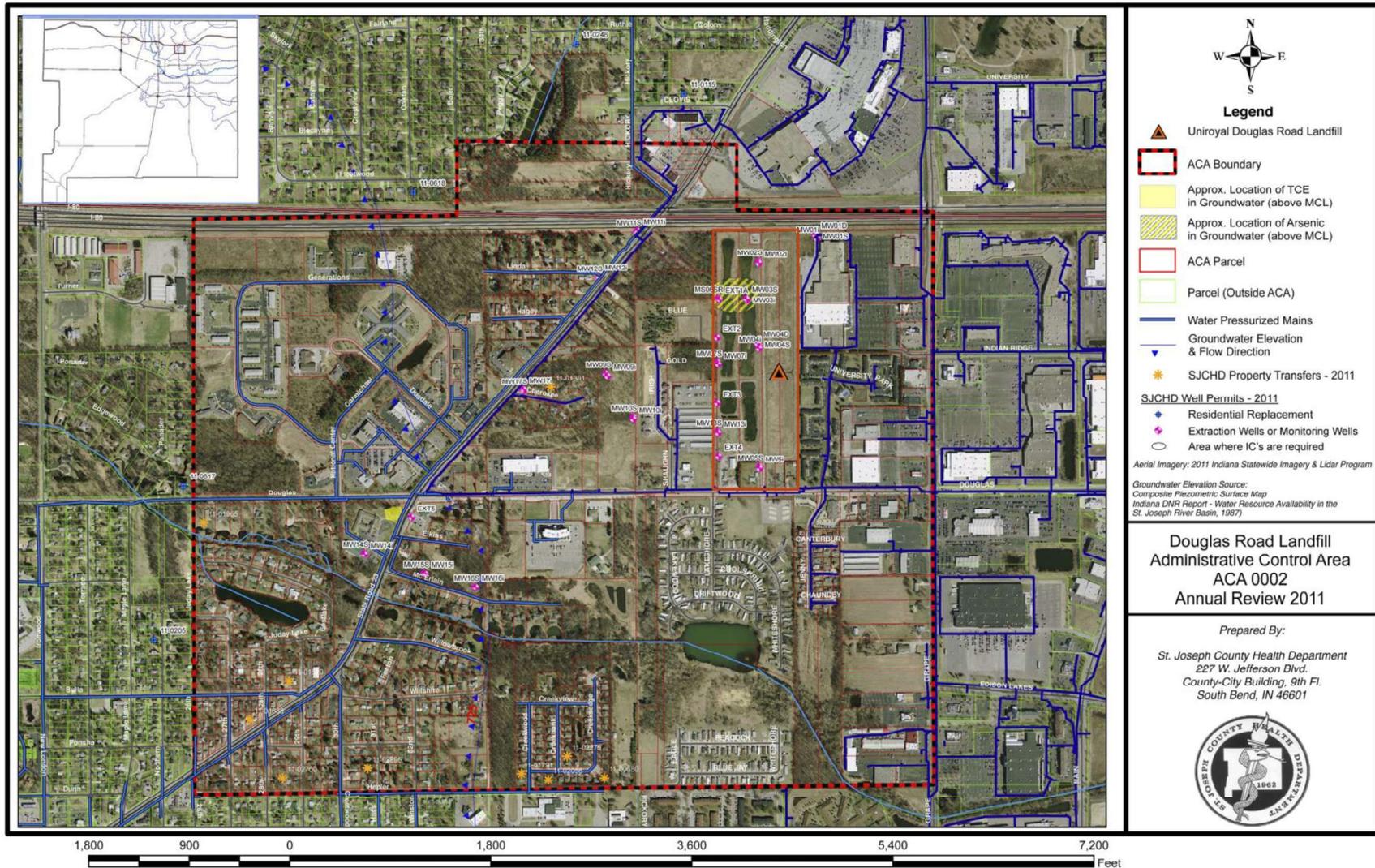
EPA Response – EPA added the comment with the attached records to the Site files and the Deletion Docket. However, EPA has not verified the accuracy of the reports. Also, as indicated to the commenter in EPA’s email dated July 29, 2020, as long as IDEM and EPA have access to the Site and the property owner complies with the Environmental Covenants, EPA does not get involved in Site ownership or property transfers.

ATTACHMENTS

- Attachment 1 – Figure: St. Joseph County Administrative Control Area
- Attachment 2 – Laboratory Results from Residential Well Testing (Address Redacted)
- Attachment 3 – Comments from Resident
- Attachment 4 – Comment Letter from City of Mishawaka
- Attachment 5 – Comment Submission with Operable Unit 1 Property Records

Attachment 1

Figure 2: St. Joseph County Administrative Control Area (ACA), Douglas Road/Uniroyal, Inc. Landfill Site



Attachment 2



Laboratory Report

This report may not be reproduced, except in full, without prior written approval from Your Environmental Services, LLC

If you have any questions concerning this report or the data it contains, please call us at 574.272.8484



Your Environmental Services, LLC

Mishawaka-574.272.8484

frontdesk@yesmichiana.com

Fort Wayne - 260.450.2582

frontdesk@yesfortwayne.com

Indiana Laboratory Cert # M-76-06/C-71-04

TEST RESULTS

TEST SAMPLE # 170250
 Date/Time Sampled: 8/5/2020 11:59:00 AM
 Date/Time Received: 8/5/2020 12:25:00 PM
 Tap Sampled: Kitchen Sink
 Sampled By: Inspector KD

Result Key
VIOLATION
AT CONTAMINATION LIMIT
PASSING

LOCATION TESTED: [Redacted] Juday Lake North Granger IN 46635

PHYSICAL PARAMETERS	RESULT	MCL
pH	7.3	6.5 - 8.5 SU
Temperature	23.9 ° Celcius	
Chlorine Residual	0 mg/l	
Sample Source	Private Well	

BACTERIA	RESULT	METHOD

CHEMICAL TEST	LEVEL	METHOD	MCL	NOTE
Arsenic	< 4.0 µg/L	200.7	10	
Trivalent Arsenic	< 4.0 µg/L	200.7	10	

Jordan Garrett
Laboratory Director

Carla Snow
Laboratory Technician



Clean Air & Water Testing

Indiana Certified Laboratory
 Microbiology Certification # M-76-06
 Chemistry Certification # C-71-04
 Michigan Certified Laboratory - Microbiology/Inorganic Chemistry: 9995



THIS PAGE DOES NOT CONTAIN TEST RESULTS

This page provides the full list of contaminants available for analyzation at YES, LLC, along with the minimum level detectible and the maximum level of contamination as determined by the Environmental Protection Agency.

Analyte	Method	MRL	MRL Units	MCL
Aluminum	EPA 200.5	52	µg/L	Secondary 50-200
Antimony	EPA 200.5	3	µg/L	6
Arsenic	EPA 200.5	4	µg/L	10
Barium	EPA 200.5	1	µg/L	200
Beryllium	EPA 200.5	4	µg/L	4
Boron	EPA 200.5	15	µg/L	None
Cadmium	EPA 200.5	5	µg/L	5
Calcium	EPA 200.5	0.200	mg/L	None
Chromium	EPA 200.5	4	µg/L	100
Copper	EPA 200.5	1	µg/L	1300
Iron	EPA 200.5	7	µg/L	Secondary 300
Lead	EPA 200.5	4	µg/L	15
Magnesium	EPA 200.5	0.200	mg/L	None
Manganese	EPA 200.5	1	µg/L	Secondary 50
Molybdenum	EPA 200.5	5	µg/L	None
Nickel	EPA 200.5	1	µg/L	None
Selenium	EPA 200.5	5	µg/L	50
Silver	EPA 200.5	1	µg/L	Secondary 100
Vanadium	EPA 200.5	3	µg/L	None
Zinc	EPA 200.5	1	µg/L	Secondary 5000
Hardness	SM 2340B	1.4	mg/L	None
Nitrate	HACH 10206	0.25	mg/L	10
Nitrite	SM 4500-NO2 B	0.05	mg/L	1
Orthophosphate	SM 4500-P-E	0.05	mg/L	None
Coliform/e.Coli P/A	Colilert Pres/Ab	0	MPN	1
Coliform/e.Coli MPN	Colilert Quanti-Tray	0	MPN	1
Heterotrophic Plate Count	HPC (SimPlate)	0	MPN	200

Definitions

MRL: Minimum Reporting Limit. The lowest amount detectible by our laboratory instrument.

µg/L: Micrograms per Liter

mg/L: Miligrams per Liter

MCL: Maximum Contamination Limit. The highest amount allowed by the EPA before corrective action is needed.

MPN: Most Probable Number

Microbiology Certification # M-76-06

Chemistry Certification # C-71-04

Your Environmental Services, LLC, 4609 Grape Road, Ste D-5, Mishawaka, IN 46545

Attachment 3

Cibulskis, Karen

From: Jan Shaw <janshaw@sbcglobal.net>
Sent: Tuesday, June 30, 2020 10:55 AM
To: Cibulskis, Karen
Subject: Uniroyal Superfund site

My husband and I reside directly west of the site in subdivision "Juday Lake Estates" on 54181 Eastlake Dr South Bend in 46635. Would like our groundwater tester by EPA and Superfund site removed not just capped or stated no longer a threat. It is still a threat and the cloud or plume moves toward our lake closer every year, It is an eyesore also. Jan Shaw

Sent from my iPhone

Attachment 4



CITY OF MISHAWAKA

DAVID A. WOOD, MAYOR

OFFICE OF THE MAYOR

July 20th, 2020

U.S. Environmental Protection Agency Region 5
c/o Karen Cibulskis, NPL Deletion Coordinator,
77 W. Jackson Blvd.
Chicago, IL 60604

RE: Intent to Delete the OU1 – Landfill Cap Area of the Douglass Road/Uniroyal, Inc. Landfill Superfund Site from the National Priorities List (NPL)
City of Mishawaka Public Safety Concern regarding Methane

Dear Ms. Cibulskis:

The public comment period for this action by the USEPA in conjunction with the support of the Indiana Department of Environmental Management (IDEM) has been posted in the Federal Register. Following consultation and review with our Environmental consultant, TecServ located in South Bend Indiana, I offer the following comments on behalf of the City of Mishawaka.

The single major issue that appears to be problematic for the landfill is the presence of methane gas in a few landfill gas (LG) vent wells, specifically vent wells LG-4, LG-6, LG-7 and LG-13. Vent wells LG-6 and LG-7 are registering 100% of the lower explosive limit (LEL) for methane and wells LG-4 and LG-13 are registering at 89% and 57% of the LEL, respectively. The Site-specific Closure Goal for the Douglas Road Landfill is 5% concentration, which is the LEL for methane gas. With the gas collection system turned off, the methane gas will be allowed to increase in concentration beneath the clay-cap surface. It will then diffuse through fissures in the subsurface soil and migrate possibly offsite to nearby buildings and residences. We consider this situation as imminently hazardous to the safety of the public and are requesting that the vent wells be restored, operated and maintained in perpetuity or until the issue is truly remedied.

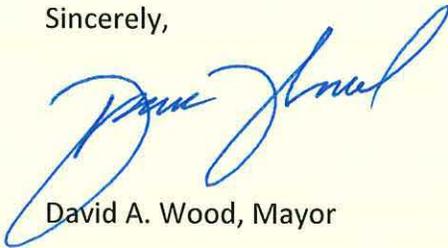
With the USEPA's current emphasis on reducing Vapor Intrusion (VI) into buildings, it is believed that the methane gas issue at the landfill Site presents an identifiable problem for closing the Douglas Road Landfill off of the NPL. **Additional funding and oversight are required to reduce this problem to nearby inhabitants and structures to an acceptable level.**

I also want to acknowledge that A few of the metals – arsenic, iron and lead – exceed the remedial goals or applicable drinking water Maximum Contaminant Levels (MCLs). The Site-specific Closure Goal for iron (Fe) was exceeded in 12 monitoring wells in the 4Q2019 monitoring period. This was reported in the April 27, 2020 1Q2020 report to IDEM by Patriot Engineering and Environmental, Inc., the current IDEM contractor covering the Site. However, according to TecServ, a search of available documents on the Indiana Virtual Fil Cabinet (VFC) has yielded no actual reports or laboratory data in support of this assertion.

Past documentation of disposal of fly ash from the Uniroyal site in Mishawaka, IN at the Douglas Road Landfill was initially cited as the cause of the groundwater contamination of metals, i.e. arsenic, lead and iron. With levels of these contaminants exceeding MCLs and Site-specific Closure Goals. It is understood that all future development in this geographical area will need to remain on municipal supplied water by both the City of Mishawaka and South Bend, Indiana.

Thank you for your continued work on these issues and we appreciate being able to provide input. Please feel free to contact me at any time to discuss these issues in more detail.

Sincerely,

A handwritten signature in blue ink, appearing to read "David A. Wood", is written over the typed name below.

David A. Wood, Mayor

Attachment 5

Regulations.gov will start redirecting users to the Beta at <https://beta.regulations.gov> on Thursday, August 6th, at 8 am ET to Friday, August 7th at 8 am ET. Please note that all comments that are submitted through the Beta, both during the redirect and regular operations are provided to agencies.



Comment submitted by R. Shields

This is a Comment on the **Environmental Protection Agency (EPA) Proposed Rule: National Oil and Hazardous Substances Pollution Contingency Plan; National Priorities List: Partial Deletion of the Douglass Road/Uniroyal, Inc. Landfill Superfund Site**

For related information, [Open Docket Folder](#)

Comment

OU1 owner records on file July 2020.

Attachments (4)

Michiana Regional GIS OU1 Ownership

View Attachment:

Michiana Regional GIS OU1 (west half) Ownership

View Attachment:

OU1 DLF Ownership Greener Investment Holding LLC

View Attachment:

OU1 (east half) DLF Ownership Greener Investment Holding LLC

View Attachment:

ID: EPA-HQ-SFUND-1989-0008-0283

Tracking Number: kcy-xrxl-3932

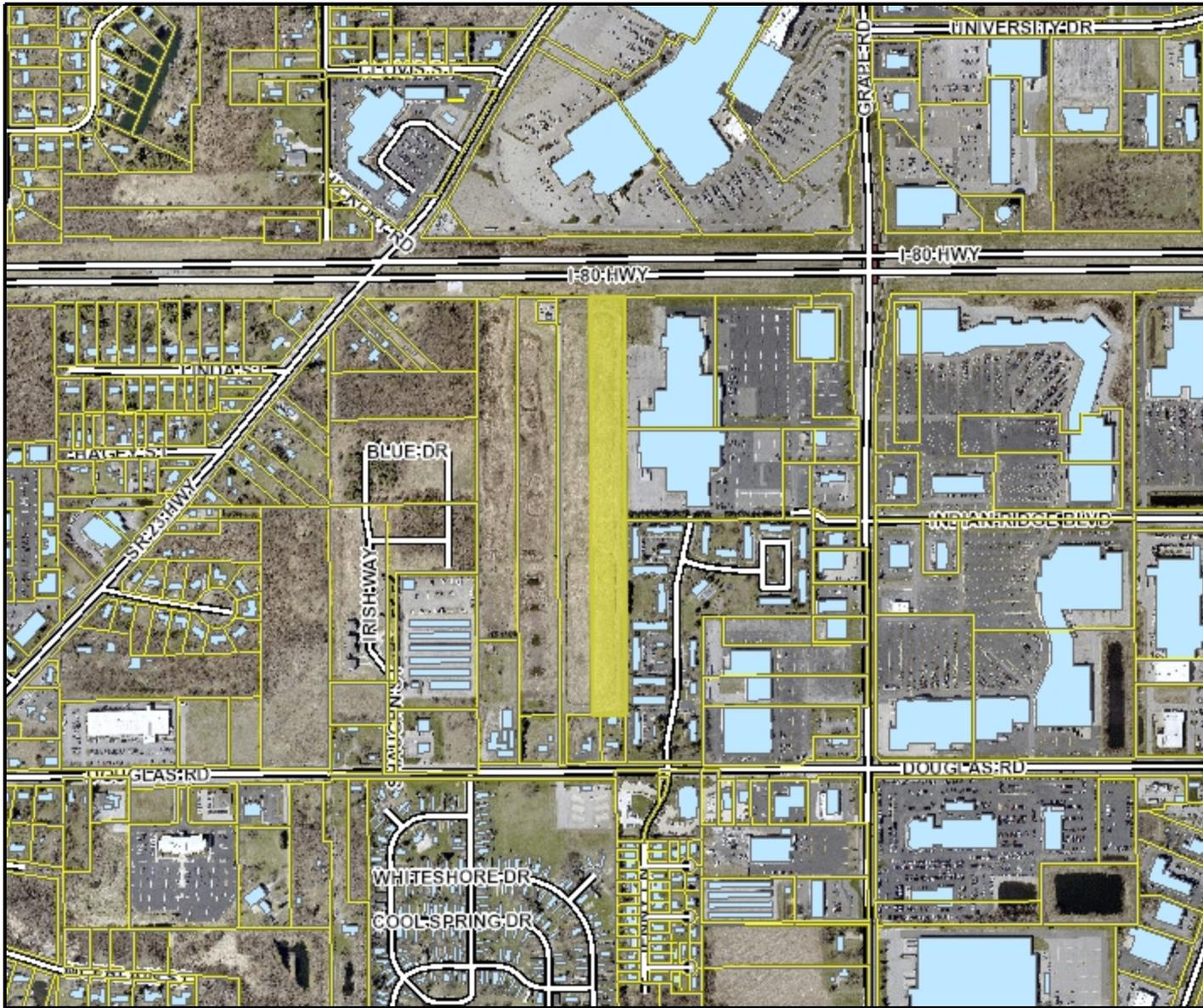
Document Information

Date Posted:
Jul 29, 2020

RIN:
Not Assigned

This agency received 4 duplicate or significantly similar comments.

[Show More Details](#)



Michiana Regional GIS Website

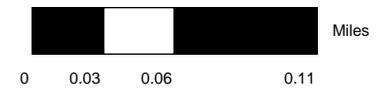
OU1 DLF Ownership Greener Investment Holding LLC

Legend

- SJC Parcel Dimensions
- SJC Parcels
- ELK Parcels
- SJC Street
- ELK Street
- Building Footprint
- Railroad
 - Railroad
 - Abandoned Railroad
- Road Centerline
- Railroad Bridge
- Roadway Bridge



1 inch = 600.00 feet



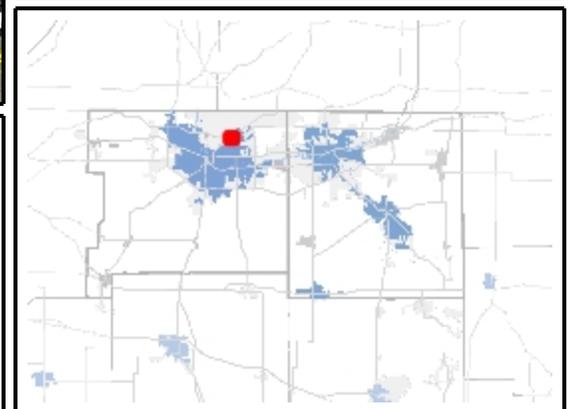
Date Printed: 7/21/2020

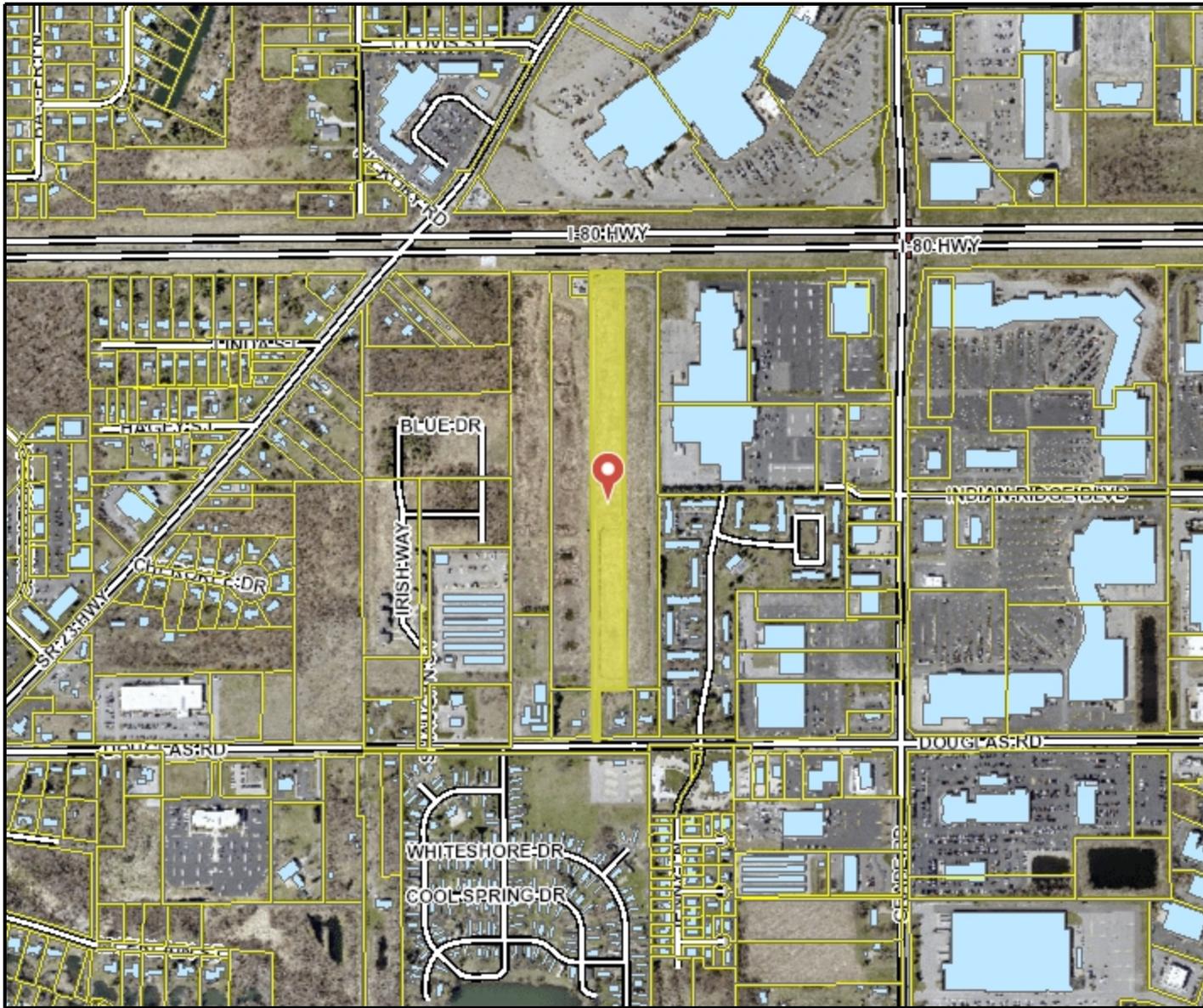
Map Generated By: Public

Coordinate grid is based on Indiana East State Plane Coordinate System 1983 North American Datum.

Information shown on this map is not warranted for accuracy or merchantability. Reproduction or distribution of this material is not authorized without the express written permission of MACOG.

Michiana Area Council of Governments | Geographic Information System
Elkhart and St. Joseph Counties, IN





Michiana Regional GIS Website

OU1 DLF Ownership (west half) Greener Investment Holding LLC

Legend

- SJC Parcel Dimensions
- SJC Parcels
- ELK Parcels
- SJC Street
- ELK Street
- Building Footprint
- Railroad
 - Railroad
 - Abandoned Railroad
- Road Centerline
- Railroad Bridge
- Roadway Bridge



1 inch = 600.00 feet

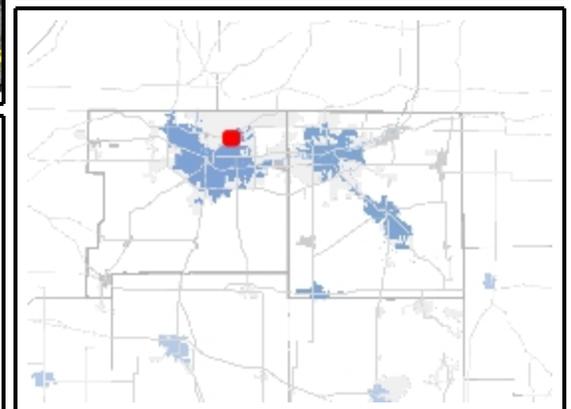


Date Printed: 7/21/2020

Map Generated By: Public

Coordinate grid is based on Indiana East State Plane Coordinate System 1983 North American Datum.

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ADMINISTRATIVE INFORMATION

OWNERSHIP

Tax ID 002-2018-037902

Printed 04/24/2020 Card No. 1 of 1

PARCEL NUMBER
71-04-28-301-010.000-003
Parent Parcel Number
Property Address
V/L-REAR OF 16731 DOUGLAS RD
Neighborhood
7103032 02495
Property Class
400 Com Vacant land

GREENER INVESTMENT HOLDING LLC
60 EAST SIMPSON AVE #2869
JACKSON, WY 83001 UNITED STATES OF AMERICA
10 Rds E Side Of 34 Rds W Side Of Mid Pt 7.792 Ac Ex
Pts Sold To Toll Rd And Ex
S Side Sw Sec 28-38-3e 19/20 ANNEX #2017-37

TRANSFER OF OWNERSHIP

Table with columns: Date, Transferor, Amount, Date, Recipient, Amount. Includes entry for 10/22/2018, Uniroyal Inc, \$152.

COMMERCIAL

TAXING DISTRICT INFORMATION

Jurisdiction 71 St. Joseph
Area 002 Clay
Corporation N
District 003 CLAY TOWNSHIP
Routing Number 4-28E

VALUATION RECORD

Table with columns: Year, Reason for Change, Valuation, Appraised Value, True Tax Value. Shows values for 2018, 2019, and 2020.

Site Description

Legal Acres: 0.0000
Admin Legal 0.0000

LAND DATA AND CALCULATIONS

Table with columns: Land Type, Rating, Measured Acreage, Table, Prod. Factor, Base Rate, Adjusted Rate, Extended Value, Influence Factor, Value. Includes entry for 2 UNDEVELOPED UNUSABLE.

AN19: ANNEXATION 2019 PAY 2020
11-30-2018 - THIS PARCEL HAS BEEN ANNEXED TO & DECLARED TO BE PART OF THE CITY OF MISHAWAKA, INDIANA PER ORDINANCE #5594, EFFECTIVE FOR 2019 PAYABLE 2020. SEE TAX ID #029-2018-037902 FOR ASSESSMENT INFORMATION. DOCUMENT IS ATTACHED. MM
09-13-2019 - THIS PARCEL WAS ANNEXED IN ERROR WITH ORDINANCE #5594. THE ORDINANCE INCLUDED THE WRONG LEGAL DESCRIPTION. ORDINANCE #5656 CORRECTED THE LEGAL. TAX ID #002-2018-037902 IS NOW INACTIVE. DOCUMENT IS ATTACHED. MM
CR2: CYCLICAL REASSESSMENT 2ND QTR
CR21: CYCLICAL REASSESSMENT 18-22 1
VIEWED PARCEL FOR A 2019/20 ANNEXATION. MM
MM01: Plexis Conv. Note 08/31/1994 Parcel
TRANSFER DATE 10/16/81
RA12: GENERAL REASSESSMENT 2012
Parcel viewed 7-5-2011

Supplemental Cards

TRUE TAX VALUE 11240

FARMLAND COMPUTATIONS

Parcel Acreage
81 Legal Drain NV [-]
82 Public Roads NV [-]
83 UT Towers NV [-]
9 Homesite(s) [-]
91/92 Excess Acreage[-]
TOTAL ACRES FARMLAND
TRUE TAX VALUE

Measured Acreage
Average True Tax Value/Acre
TRUE TAX VALUE FARMLAND
Classified Land Total
Homesite(s) Value (+)
Excess Acreage Value (+)

Supplemental Cards
TOTAL LAND VALUE

11200

ADMINISTRATIVE INFORMATION

OWNERSHIP

Tax ID 002-2018-037903

Printed 04/24/2020 Card No. 1 of 1

PARCEL NUMBER
71-04-28-326-005.000-003
Parent Parcel Number
Property Address
V/L-REAR OF 16845 DOUGLAS RD
Neighborhood
7103032 02495
Property Class
400 Com Vacant land

GREENER INVESTMENT HOLDING LLC
4000 SIGMA RD
APT 11307
FARMERS BRANCH, TX 75244-8129 UNITED STATES OF AMERICA
10 Rds Off W Side Mid Pt Ex Pt To Toll Rd And Ex Pt S
Sw Sec 28-38-3e
19/20 ANNEX #2017-37

TRANSFER OF OWNERSHIP

Table with columns: Date, Transferor, Transferee, Amount. Includes entry for 09/24/2019 transfer to Uniroyal Inc C/O Uniroyal Plastics for \$5001.

COMMERCIAL

TAXING DISTRICT INFORMATION

Jurisdiction 71 St. Joseph
Area 002 Clay
Corporation N
District 003 CLAY TOWNSHIP
Routing Number 4-28F

VALUATION RECORD

Table with columns: Year, Reason for Change, Valuation, Appraised Value, True Tax Value. Shows values for 2018, 2019, and 2020.

Site Description

Legal Acres: 8.1200
Admin Legal 0.0000

LAND DATA AND CALCULATIONS

Table with columns: Land Type, Rating, Measured Acreage, Table, Prod. Factor, Base Rate, Adjusted Rate, Extended Value, Influence Factor, Value. Includes entry for 2 UNDEVELOPED UNUSABLE land.

AN19: ANNEXATION 2019 PAY 2020
11-30-2018 - THIS PARCEL HAS BEEN ANNEXED TO & DECLARED TO BE PART OF THE CITY OF MISHAWAKA, INDIANA PER ORDINANCE #5594, EFFECTIVE FOR 2019 PAYABLE 2020. SEE TAX ID #029-2018-037903 FOR ASSESSMENT INFORMATION. DOCUMENT IS ATTACHED. MM
09-13-2019 - THIS PARCEL WAS ANNEXED IN ERROR WITH ORDINANCE #5594. THE ORDINANCE INCLUDED THE WRONG LEGAL DESCRIPTION. ORDINANCE #5656 CORRECTED THE LEGAL. TAX ID #002-2018-037903 IS NOW INACTIVE. DOCUMENT IS ATTACHED. MM
CR2: CYCLICAL REASSESSMENT 2ND QTR
CR21: CYCLICAL REASSESSMENT 18-22 1
VIEWED PARCEL FOR A 2019/20 ANNEXATION. MM
MM01: Plexis Conv. Note 09/26/1994 Parcel
TRANSFER DATE 10/16/81HAZARDOUS DUMP SITE
RA12: GENERAL REASSESSMENT 2012
Parcel viewed 7-5-2011

Supplemental Cards

TRUE TAX VALUE 12180

FARMLAND COMPUTATIONS

Parcel Acreage 8.1200
81 Legal Drain NV [-]
82 Public Roads NV [-]
83 UT Towers NV [-]
9 Homesite(s) [-]
91/92 Excess Acreage[-]
TOTAL ACRES FARMLAND
TRUE TAX VALUE

Measured Acreage
Average True Tax Value/Acre
TRUE TAX VALUE FARMLAND
Classified Land Total
Homesite(s) Value (+)
Excess Acreage Value (+)

Supplemental Cards

TOTAL LAND VALUE 12200