



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.

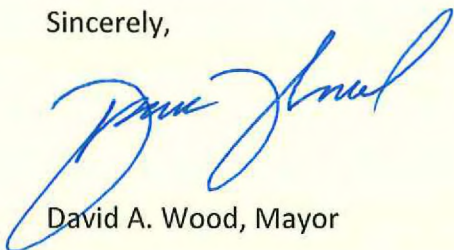
With the USEPA's current emphasis on reducing Vapor Intrusion (VI) into buildings, it is believed that the methane gas issue at the landfill Site presents an identifiable problem for closing the Douglas Road Landfill off of the NPL. **Additional funding and oversight are required to reduce this problem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

David A. Wood, Mayor