



REGION 5

CHICAGO, IL 60604

ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED

November 26, 2025

Cindy Shively Klem
Brownfields Program Counsel
Indiana Brownfields Program
100 North Senate Avenue, Room 1275
Indianapolis, Indiana 46204

Re: DHPA # 34164 (Former RMG Foundry)

Dear Ms. Shively:

EPA has reviewed the information for the Dodge Manufacturing Company/Former RMG Foundry, DPHA #34164, and, consistent with 54 U.S.C. § 306108, 36 C.F.R. Part 800, is proposing a finding of no adverse effect, under 36 C.F.R. § 800.5(b), because the scope of this undertaking is limited to the removal of asbestos.

EPA will be funding the abatement of asbestos. We understand that the City of Mishawaka intends to later demolish the building but is doing so with non-federal funds. These are separate actions, the latter of which is outside of EPA's purview. Moreover, demolition is just one option for activities that could take place at the property after the abatement of asbestos, universal waste, and hazardous waste. Therefore, EPA has no control over the City's demolition, and EPA lacks authority to either fund or set requirements regarding the demolition, including any mitigation activities under the NHPA stemming from the demolition.

Pursuant to 36 C.F.R. 800.5(b), the asbestos removal does not adversely affect the historic property within the Area of Potential Effects (APE), the Dodge Manufacturing Company/RMG Foundry complex, which may be eligible for listing on the National Register of Historic Places, because these removal activities are consistent with 36 C.F.R. Part 68 and will not alter any of the characteristics of the property that qualify it for inclusion in the National Register. See 36 C.F.R. § 800.5(a). Please see the enclosed memorandum from Eric Stalheim, NCARB, AIA, fulfilling the requirements of 36 C.F.R. § 800.11(e). Accordingly, EPA proposes a finding of no adverse effect for the asbestos removal undertaking.

Please note that the public comment process will be fulfilled in consultation with Indiana Finance Authority before the finalization of the finding; EPA will consider all comments before finalizing its proposed finding.

Please contact me at green.ashley@epa.gov or (312) 886-6054 with any questions.

Sincerely,



Ashley Green
Project Officer/Project Manager
Brownfields Section #1
US EPA LP-17J

Enclosures

cc:

Tracey Michael, Indiana Finance Authority
Haley Faulds, Indiana Finance Authority
Mitchell Smith, Indiana Finance Authority
Amy Johnson, Indiana Department of Natural Resources
Shangzhe Cai, Indiana Department of Natural Resources
Jillian Rountree, EPA Region 5 Office of Regional Counsel
Ariel MacMillan-Sanchez, EPA Region 5 Office of Regional Counsel