

EGLE-RRD-LansingDistrictEDM

From: Ermisch, Brad (EGLE)
Sent: Thursday, November 10, 2022 10:48 AM
To: Gies, Leah (EGLE); Lesser, Ashley (EGLE); Sakowski, Kim (EGLE); Yuvan, Melissa (EGLE); Karg, Andrew (EGLE); Bertolini, Emily (EGLE); Van Riper, Eric (EGLE)
Cc: Armbruster, Amanda (EGLE)
Subject: FW: RACER - Trust Agreement - Section 6.1 Reports as of June 30, 2022
Attachments: RACER - TA Sec 6.1(a) Unaudited Financial Statements as of 06-30-2022.pdf; RACER - TA Sec 6.1(b) Environmental Status Report - by State by Site Number as of 06-30-2022.pdf

All,

As RACER contacts for your district you may be interested in the attached. The Environmental Status Report in particular. This report highlights the “Environmental Action” work completed at sites throughout the State of Michigan.

The report covers the 12 RACER sites listed on page 16 of 75 where no further Environmental Action is planned or anticipated, and the remainder of the Michigan section covers 18 other sites that have status reports.

Brad Ermisch

Bankruptcy Specialist
Remediation and Redevelopment Division
Michigan Department of Environment, Great Lakes, and Energy



Phone: 517-275-1173

E-Mail: ermischb@michigan.gov

Spread Hope

GET VACCINATED

Save Michigan Lives.

From: Tracie Nichols <tnichols@racertrust.org>
Sent: Wednesday, November 2, 2022 9:33 AM
To: 'Roberts, Robert' <Roberts.Robert@epa.gov>; 'Wieder.Marla@epa.gov'; 'Cisneros.Jose@epa.gov'; 'James.Kropid@Illinois.gov'; 'TJunk@idem.in.gov'; 'negeleb@michigan.gov'; 'laurie.stevenson@epa.state.oh.us'; 'Chris.Ratcliff@la.gov'; 'gkarr@atg.state.il.us'; 'timothy.kern@ohioattorneygeneral.gov'; 'Richard.Engel@law.njoag.gov'; 'SynkP@michigan.gov'; 'Alan Tenenbaum' <alan.tenenbaum@usdoj.gov>; 'Capon.Virginia@epa.gov'; 'Casey, Patrick (ENRD)' <Patrick.Casey@usdoj.gov>; 'arrazola.ignacio@epa.gov'; Patricia Overmeyer <Overmeyer.Patricia@epa.gov>;

'April Lashbrook - Indiana Department of Environmental Management' <alashbro@idem.IN.gov>; Michael Beedle <beedle.michael@epa.gov>; 'Rickrich, Mark' <mark.rickrich@epa.ohio.gov>; 'katherine.smith@treasury.gov'; jennifer.davis@state.ma.us; lisa.shook@epa.ohio.gov; Michelle.Dickerman@treasury.gov; Iancu, Carol (AGO) <carol.iancu@state.ma.us>; Michael E. Idzkowski <Michael.Idzkowski@ohioattorneygeneral.gov>; Privitera, John J. <PRIVITERA@mltw.com>; singerman.joel@epa.gov; ofschiefcounselnotices@do.treas.gov; Rockafellow, Daniel (EGLE) <ROCKAFELLOWD@michigan.gov>; janet.dimaggio@wisconsin.gov; khalloran@pa.gov; chinwe.ndubuka@dnr.mo.gov; Jamie.woods@ag.ny.gov; Ermisch, Brad (EGLE) <ERMISCHB@michigan.gov>; dstilz@idem.in.gov; margaret.sheen@dec.ny.gov; john.cook@ks.gov; Conforti, Rich (EGLE) <CONFORTIR@michigan.gov>; McCabe, John (EGLE) <MCCABEJ@michigan.gov>; agarwalp@cdfi.treas.gov; bgreenert@pa.gov; danielle.christensen@treasury.gov; stanhope.jennifer@epa.gov; koller.mark@epa.gov; Anthony.sun@usdoj.gov; christopher.dove@treasury.gov; Tyson, Kimberly (EGLE) <TYSONK@michigan.gov>; doyle.james@epa.gov; sacks.victoria@epa.gov; ludmer.margo@epa.gov; Robert.Kamins@treasury.gov; Elliott.usher@dnr.mo.gov; kayli.spialter@delaware.gov; granger.mark@epa.gov; rick.galloway@delaware.gov; qazi.salahuddin@delaware.gov; kkulbok@oag.state.va.us; jwaldrop@oag.state.va.us
Cc: Elliott Laws <elaws@racertrust.org>; Carl Garvey <cgarvey@racertrust.org>; Scott Hamilton <shamilton@racertrust.org>

Subject: RACER - Trust Agreement - Section 6.1 Reports as of June 30, 2022

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Sending on behalf of Elliott P. Laws:

All,

In accordance with Section 6.1 of the Environmental Response Trust Agreement, attached please find RACER Trust's written report ("Section 6.1 Report") regarding environmental actions taken by the Environmental Response Trust in the performance of its duties through the end of the second quarter of 2022.

Section 6.1 provides that this written report is to include: (a) financial statements of the Environmental Response Trust through the end of such calendar quarter; and (b) descriptions of environmental actions taken which have had a material and adverse effect on the Environmental Response Trust – as determined by outside counsel, accountants, or other professional advisors -- and of which notice has not previously been given to the Governments.

During the reporting period, the Trust took no environmental actions to have triggered reporting under Section 6.1 (b). Nonetheless, we believe that the attached descriptions of the environmental actions taken by the Trust may be of value to you. Note that these descriptions are both property- or site-specific and cumulative in format.

Please contact Carl Garvey or Scott Hamilton – both copied here – with any questions or comments on the Section 6.1 Reports. If you would like an in-depth briefing on any of the properties or sites, please let me know so that it can be scheduled.

Regards,

Elliott P. Laws
Managing Member - EPLET, LLC
Administrative Trustee for
Revitalizing Auto Communities Environmental Response Trust



www.RACERTrust.org

This message may contain privileged or otherwise confidential information intended only for the use of the intended recipient(s). Do not disseminate, forward or copy this email without prior consent of the RACER Trust. If you have received this email in error, please notify the sender by return email, and delete the original and all copies of this message from your computer. Thank you.



RACER Trust

Unaudited Financial Statements

As of June 30, 2022 and for the Year to Date Period Ended June 30, 2022

[Trust Agreement – Section 6.1(a)]



Table of Contents

- Consolidated and Consolidating Financial Statements (unaudited)
- Environmental Division Financial Statements (unaudited)
- Administrative Division Financial Statements (unaudited)



RACER

Consolidated and Consolidating Unaudited Financial Statements

- Statement of Net Assets
 - Consolidated Statements of Net Assets as of June 30, 2022 and December 31, 2021
 - Consolidating Statement of Net Assets as of June 30, 2022
 - Consolidating Statement of Net Assets as of December 31, 2021
- Statement of Changes in Net Assets
 - Consolidated Statement of Changes in Net Assets for the Year to Date Period Ended June 30, 2022
 - Consolidating Statement of Changes in Net Assets for the Year to Date Period Ended June 30, 2022
- Statement of Changes in Cash Flows
 - Consolidated Statement of Cash Flows for the Year to Date Period Ended June 30, 2022
 - Consolidating Statement of Cash Flows for the Year to Date Period Ended June 30, 2022



Consolidated Statements of Net Assets As of June 30, 2022 and December 31, 2021

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
CONSOLIDATED STATEMENTS OF NET ASSETS
All (All)
As of JUNE 30, 2022 and DECEMBER 31, 2021
(Unaudited - amounts in thousands of U.S. dollars)**

	<u>JUNE 30, 2022</u>	<u>DECEMBER 31, 2021</u>	<u>Variance - \$</u>	<u>Variance - %</u>
Assets:				
Cash and cash equivalents	\$ 8,152	\$ 30,595	\$ (22,443)	-73.4%
Short term investments in U.S. Treasury securities	63,738	24,900	38,838	156.0%
Accrued interest receivable	805	854	(49)	-5.7%
Accounts receivable	187	206	(19)	-9.2%
Prepaid expenses	685	813	(128)	-15.7%
Assets held for sale		103	(103)	-100.0%
Current assets	<u>73,567</u>	<u>57,471</u>	<u>16,096</u>	<u>28.0%</u>
Property, plant and equipment:				
Land and building	5,962	5,962	-	0.0%
Property, plant and equipment	5,962	5,962	-	0.0%
Investments in U.S. Treasury securities	269,907	293,520	(23,613)	-8.0%
Deposits	17	17	-	0.0%
Restricted cash	2,015	2,015	-	0.0%
Non-current assets	<u>277,901</u>	<u>301,514</u>	<u>(23,613)</u>	<u>-7.8%</u>
Total assets	<u>\$ 351,468</u>	<u>\$ 358,985</u>	<u>\$ (7,517)</u>	<u>-2.1%</u>
Liabilities:				
Accounts payable and accrued expenses	\$ 227	\$ 222	\$ 5	2.3%
Accrued holding costs	915	896	19	2.1%
Accrued demolition costs	161	161	-	0.0%
Deferred income - current	202	307	(105)	-34.2%
Accrued professional fees	141	64	77	120.3%
Short term environmental reserves	40,476	48,067	(7,591)	-15.8%
Current liabilities	<u>42,122</u>	<u>49,717</u>	<u>(7,595)</u>	<u>-15.3%</u>
Long term environmental reserves	185,814	185,814	-	0.0%
Non-current liabilities	<u>185,814</u>	<u>185,814</u>	<u>-</u>	<u>0.0%</u>
Total liabilities	<u>227,936</u>	<u>235,531</u>	<u>(7,595)</u>	<u>-3.2%</u>
Net assets at end of period	<u>\$ 123,532</u>	<u>\$ 123,454</u>	<u>\$ 78</u>	<u>0.1%</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Consolidating Statement of Net Assets As of June 30, 2022

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
CONSOLIDATING STATEMENT OF NET ASSETS
All (All)
AS OF JUNE2022
(Unaudited - amounts in thousands of U.S. dollars)**

	<u>Environmental Division</u>	<u>Administrative Division</u>	<u>Eliminations</u>	<u>RACER Consolidated</u>
<u>Assets:</u>				
Cash and cash equivalents	\$ 5,495	\$ 2,657	\$ -	\$ 8,152
Short term investments in U.S. Treasury securities	41,313	22,425	-	63,738
Accrued interest receivable	526	279	-	805
Accounts receivable	-	187	-	187
Prepaid expenses	-	685	-	685
Current assets	<u>47,334</u>	<u>26,233</u>	<u>-</u>	<u>73,567</u>
Property, plant and equipment:				
Land and building	-	5,962	-	5,962
Property, plant and equipment		5,962	-	5,962
Investments in U.S. Treasury securities	165,273	104,634	-	269,907
Deposits	-	17	-	17
Restricted cash	-	2,015	-	2,015
Non-current assets	<u>165,273</u>	<u>112,628</u>	<u>-</u>	<u>277,901</u>
Total assets	<u>\$ 212,607</u>	<u>\$ 138,861</u>	<u>\$ -</u>	<u>\$ 351,468</u>
<u>Liabilities:</u>				
Accounts payable and accrued expenses	\$ -	\$ 227	\$ -	\$ 227
Accrued holding costs	-	915	-	915
Accrued demolition costs	-	161	-	161
Deferred income - current	-	202	-	202
Accrued professional fees	-	141	-	141
Short term environmental reserves	40,476	-	-	40,476
Current liabilities	<u>40,476</u>	<u>1,646</u>	<u>-</u>	<u>42,122</u>
Long term environmental reserves	185,814	-	-	185,814
Non-current liabilities	<u>185,814</u>	<u>-</u>	<u>-</u>	<u>185,814</u>
Total liabilities	<u>226,290</u>	<u>1,646</u>	<u>-</u>	<u>227,936</u>
Net assets at end of period	<u>\$ (13,683)</u>	<u>\$ 137,215</u>	<u>\$ -</u>	<u>\$ 123,532</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Consolidating Statement of Net Assets As of December 31, 2021

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
CONSOLIDATING STATEMENT OF NET ASSETS
All (All)
AS OF DECEMBER 2021
(Unaudited - amounts in thousands of U.S. dollars)**

	<u>Environmental Division</u>	<u>Administrative Division</u>	<u>Eliminations</u>	<u>RACER Consolidated</u>
<u>Assets:</u>				
Cash and cash equivalents	\$ 15,406	\$ 15,189	\$ -	\$ 30,595
Short term investments in U.S. Treasury securities	17,500	7,400	-	24,900
Accrued interest receivable	555	299	-	854
Accounts receivable	-	206	-	206
Prepaid expenses	-	813	-	813
Assets held for sale	-	103	-	103
Current assets	<u>33,461</u>	<u>24,010</u>	<u>-</u>	<u>57,471</u>
Property, plant and equipment:				
Land and building	-	5,962	-	5,962
Property, plant and equipment	-	5,962	-	5,962
Investments in U.S. Treasury securities	184,914	108,606	-	293,520
Deposits	-	17	-	17
Restricted cash	-	2,015	-	2,015
Non-current assets	<u>184,914</u>	<u>116,600</u>	<u>-</u>	<u>301,514</u>
Total assets	<u>\$ 218,375</u>	<u>\$ 140,610</u>	<u>\$ -</u>	<u>\$ 358,985</u>
<u>Liabilities:</u>				
Accounts payable and accrued expenses	\$ -	\$ 222	\$ -	\$ 222
Accrued holding costs	-	896	-	896
Accrued demolition costs	-	161	-	161
Deferred income - current	-	307	-	307
Accrued professional fees	-	64	-	64
Short term environmental reserves	48,067	-	-	48,067
Current liabilities	<u>48,067</u>	<u>1,650</u>	<u>-</u>	<u>49,717</u>
Long term environmental reserves	<u>185,814</u>	<u>-</u>	<u>-</u>	<u>185,814</u>
Non-current liabilities	<u>185,814</u>	<u>-</u>	<u>-</u>	<u>185,814</u>
Total liabilities	<u>233,881</u>	<u>1,650</u>	<u>-</u>	<u>235,531</u>
Net assets at end of period	<u>\$ (15,506)</u>	<u>\$ 138,960</u>	<u>\$ -</u>	<u>\$ 123,454</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Consolidated Statement of Changes in Net Assets For the Year to Date Period Ended June 30, 2022

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE
TRUST
CONSOLIDATED STATEMENT OF CHANGES IN NET ASSETS
All (All)
FOR THE YEAR TO DATE PERIOD ENDED JUNE2022
(Unaudited - amounts in thousands of U.S. dollars)**

	<u>JUNE2022</u>
Changes in net assets:	
Revenues:	
Rental and other income	\$ 1,975
Investment income	3,215
Total revenues	<u>5,190</u>
Expenses:	
Holding costs:	
Operating costs	481
Decommissioning costs	34
Separation costs	180
Property taxes	332
Total holding costs	<u>1,027</u>
Overhead costs:	
Facility costs, travel and other expenses	529
Insurance expense	268
Payroll and employee benefits	2,482
Redevelopment costs	263
Total overhead costs	<u>3,542</u>
Professional fees	377
Other expenses, net:	
Gain on disposal of property, plant and equipment	(6)
Real estate transaction and other costs	172
Total other expense, net	<u>166</u>
Total expenses, net	<u>5,112</u>
Change in net assets	78
Net assets at beginning of period	<u>123,454</u>
Net assets at end of period	<u>\$ 123,532</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Consolidating Statement of Changes in Net Assets For the Year to Date Period Ended June 30, 2022

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
CONSOLIDATING STATEMENT OF CHANGES IN NET ASSETS
All (All)
FOR THE YEAR TO DATE PERIOD ENDED JUNE 2022
(Unaudited - amounts in thousands of U.S. dollars)**

	<u>Environmental Division</u>	<u>Administrative Division</u>	<u>Eliminations</u>	<u>RACER Consolidated</u>
Changes in net assets:				
Revenues:				
Rental and other income	\$ -	\$ 1,975	\$ -	\$ 1,975
Investment income	1,821	1,394	-	3,215
Total revenues	1,821	3,369	-	5,190
Expenses:				
Holding costs:				
Operating costs	-	481	-	481
Decommissioning costs	-	34	-	34
Separation costs	-	180	-	180
Property taxes	-	332	-	332
Total holding costs	-	1,027	-	1,027
Overhead costs:				
Facility costs, travel and other expenses	-	529	-	529
Insurance expense	-	268	-	268
Payroll and employee benefits	-	2,482	-	2,482
Redevelopment costs	-	263	-	263
Total overhead costs	-	3,542	-	3,542
Professional fees	-	377	-	377
Other expense, net:				
Gain on disposal of property, plant and equipment	-	(6)	-	(6)
Real estate transaction and other costs	-	172	-	172
Total other expense, net	-	166	-	166
Total expenses, net	-	5,112	-	5,112
Change in net assets	1,821	(1,743)	-	78
Net assets at beginning of period	(15,506)	138,960	-	123,454
Net assets at end of period	\$ (13,685)	\$ 137,217	\$ -	\$ 123,532

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Consolidated Statement of Cash Flows

For the Year to Date Period Ended June 30, 2022

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
CONSOLIDATED STATEMENT OF CASH FLOWS
All (All)
FOR THE YEAR TO DATE PERIOD ENDED JUNE2022**

(Unaudited - amounts in thousands of U.S. dollars)

	<u>JUNE2022</u>
Operating activities:	
Change in net assets	\$ 78
Adjustments to reconcile change in net assets to net cash used in operating activities:	
Gain on disposal of property, plant and equipment	(6)
Amortization of premium (discount) on investments in U.S. Treasury securities	(303)
Changes in assets and liabilities:	
Accrued interest receivable	49
Accounts receivable, net	19
Prepaid expenses	127
Accounts payable and accrued expenses	5
Accrued holding costs	18
Accrued professional fees	76
Deferred income	(105)
Environmental reserves	<u>(7,591)</u>
Net cash used in operating activities	<u>(7,633)</u>
Investing activities:	
Purchases of U.S. Treasury securities	(36,820)
Maturities of U.S. Treasury securities	21,900
Proceeds from disposal of land and building	<u>110</u>
Net cash used in investing activities	<u>(14,810)</u>
Decrease in cash and cash equivalents	(22,443)
Cash and cash equivalents at beginning of period	<u>30,595</u>
Cash and cash equivalents at end of period	<u>\$ 8,152</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Consolidating Statement of Cash Flows

For the Year to Date Period Ended June 30, 2022

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
CONSOLIDATING STATEMENT OF CASH FLOWS
All (All)
FOR THE YEAR TO DATE PERIOD ENDED JUNE 2022**

(Unaudited - amounts in thousands of U.S. dollars)

	<u>Environmental Division</u>	<u>Administrative Division</u>	<u>Eliminations</u>	<u>RACER Consolidated</u>
Operating activities:				
Change in net assets	\$ 1,821	\$ (1,743)	\$ -	\$ 78
Adjustments to reconcile change in net assets to net cash used in operating activities:				
Gain on disposal of property, plant and equipment	-	(6)	-	(6)
Amortization of premium (discount) on investments in U.S. Treasury securities	(215)	(89)	-	(304)
Changes in assets and liabilities:				
Accrued interest receivable	30	20	-	50
Accounts receivable, net	-	19	-	19
Prepaid expenses	-	127	-	127
Accounts payable and accrued expenses	-	5	-	5
Accrued holding costs	-	18	-	18
Accrued professional fees	-	76	-	76
Deferred income	-	(105)	-	(105)
Environmental reserves	(7,591)	-	-	(7,591)
Net cash used in operating activities	<u>(5,955)</u>	<u>(1,678)</u>	<u>-</u>	<u>(7,633)</u>
Investing activities:				
Purchases of U.S. Treasury securities	(19,456)	(17,364)	-	(36,820)
Maturities of U.S. Treasury securities	15,500	6,400	-	21,900
Proceeds from disposal of land and building	-	110	-	110
Net cash used in investing activities	<u>(3,956)</u>	<u>(10,854)</u>	<u>-</u>	<u>(14,810)</u>
Decrease in cash and cash equivalents	(9,911)	(12,532)	-	(22,443)
Cash and cash equivalents at beginning of period	<u>15,406</u>	<u>15,189</u>	<u>-</u>	<u>30,595</u>
Cash and cash equivalents at end of period	<u>\$ 5,495</u>	<u>\$ 2,657</u>	<u>\$ -</u>	<u>\$ 8,152</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



RACER

Environmental Division

Unaudited Financial Statements

- Statement of Net Assets
 - Environmental Division Statements of Net Assets as of June 30, 2022 and December 31, 2021
- Statement of Changes in Net Assets
 - Environmental Division Statement of Changes in Net Assets for the Year to Date Period Ended June 30, 2022
- Statement of Changes in Cash Flows
 - Environmental Division Statement of Cash Flows for the Year to Date Period Ended June 30, 2022



Environmental Division Statements of Net Assets As of June 30, 2022 and December 31, 2021

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
ENVIRONMENTAL STATEMENTS OF NET ASSETS
All (All)
As of JUNE 30, 2022 and DECEMBER 31, 2021
(Unaudited - amounts in thousands of U.S. dollars)**

	<u>JUNE 30, 2022</u>	<u>DECEMBER 31, 2021</u>	<u>Variance - \$</u>	<u>Variance - %</u>
Assets:				
Cash and cash equivalents	\$ 5,495	\$ 15,406	\$ (9,911)	-64.3%
Short term investments in U.S. Treasury securities	41,313	17,500	23,813	136.1%
Accrued interest receivable	526	555	(29)	-5.2%
Current assets	<u>47,334</u>	<u>33,461</u>	<u>13,873</u>	<u>41.5%</u>
Investments in U.S. Treasury securities	165,273	184,914	(19,641)	-10.6%
Non-current assets	<u>165,273</u>	<u>184,914</u>	<u>(19,641)</u>	<u>-10.6%</u>
Total assets	<u>\$ 212,607</u>	<u>\$ 218,375</u>	<u>\$ (5,768)</u>	<u>-2.6%</u>
Liabilities:				
Short term environmental reserves	\$ 40,476	\$ 48,067	\$ (7,591)	-15.8%
Current liabilities	<u>40,476</u>	<u>48,067</u>	<u>(7,591)</u>	<u>-15.8%</u>
Long term environmental reserves	185,814	185,814	-	0.0%
Non-current liabilities	<u>185,814</u>	<u>185,814</u>	<u>-</u>	<u>0.0%</u>
Total liabilities	<u>226,290</u>	<u>233,881</u>	<u>(7,591)</u>	<u>-3.2%</u>
Net assets at end of period	<u>\$ (13,683)</u>	<u>\$ (15,506)</u>	<u>\$ 1,823</u>	<u>-11.8%</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Environmental Division

Statement of Changes in Net Assets

For the Year to Date Period Ended June 30, 2022

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST
ENVIRONMENTAL STATEMENT OF CHANGES IN NET ASSETS
All (All)
FOR THE YEAR TO DATE PERIOD ENDED JUNE 2022
(Unaudited - amounts in thousands of U.S. dollars)

	<u>JUNE 2022</u>
Changes in net assets:	
Revenues:	
Investment income	\$ 1,821
Total revenues	<u>1,821</u>
Change in net assets	1,821
Net assets at beginning of period	<u>(15,506)</u>
Net assets at end of period	<u>\$ (13,685)</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Environmental Division Statement of Cash Flows For the Year to Date Period Ended June 30, 2022

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
 RESPONSE TRUST
 ENVIRONMENTAL STATEMENT OF CASH FLOWS
 All (All)
 FOR THE YEAR TO DATE PERIOD ENDED JUNE2022

(Unaudited - amounts in thousands of U.S. dollars)

	<u>JUNE2022</u>
Operating activities:	
Change in net assets	\$ 1,821
Adjustments to reconcile change in net assets to net cash used in operating activities:	
Amortization of premium (discount) on investments in U.S. Treasury securities	(215)
Changes in assets and liabilities:	
Accrued interest receivable	30
Environmental reserves	<u>(7,591)</u>
Net cash used in operating activities	<u>(5,955)</u>
Investing activities:	
Purchases of U.S. Treasury securities	(19,456)
Maturities of U.S. Treasury securities	<u>15,500</u>
Net cash used in investing activities	<u>(3,956)</u>
Decrease in cash and cash equivalents	(9,911)
Cash and cash equivalents at beginning of period	<u>15,406</u>
Cash and cash equivalents at end of period	<u>\$ 5,495</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



RACER

Administrative Division

Unaudited Financial Statements

- Statement of Net Assets
 - Administrative Division Statements of Net Assets as of June 30, 2022 and December 31, 2021
- Statement of Changes in Net Assets
 - Administrative Division Statement of Changes in Net Assets for the Year to Date Period Ended June 30, 2022
- Statement of Changes in Cash Flows
 - Administrative Division Statement of Cash Flows for the Year to Date Period Ended June 30, 2022



Administrative Division Statements of Net Assets As of June 30, 2022 and December 31, 2021

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
ADMINISTRATIVE STATEMENTS OF NET ASSETS
All (All)
As of JUNE 30, 2022 and DECEMBER 31, 2021
(Unaudited - amounts in thousands of U.S. dollars)**

	<u>JUNE 30, 2022</u>	<u>DECEMBER 31, 2021</u>	<u>Variance - \$</u>	<u>Variance - %</u>
Assets:				
Cash and cash equivalents	\$ 2,657	\$ 15,189	\$ (12,532)	-82.5%
Short term investments in U.S. Treasury securities	22,425	7,400	15,025	203.0%
Accrued interest receivable	279	299	(20)	-6.7%
Accounts receivable	187	206	(19)	-9.2%
Prepaid expenses	685	813	(128)	-15.7%
Assets held for sale	-	103	(103)	-100.0%
Current assets	<u>26,233</u>	<u>24,010</u>	<u>2,223</u>	<u>9.3%</u>
Property, plant and equipment:				
Land and building	<u>5,962</u>	<u>5,962</u>	<u>-</u>	<u>0.0%</u>
Property, plant and equipment	<u>5,962</u>	<u>5,962</u>	<u>-</u>	<u>0.0%</u>
Investments in U.S. Treasury securities	104,634	108,606	(3,972)	-3.7%
Deposits	17	17	-	0.0%
Restricted cash	<u>2,015</u>	<u>2,015</u>	<u>-</u>	<u>0.0%</u>
Non-current assets	<u>112,628</u>	<u>116,600</u>	<u>(3,972)</u>	<u>-3.4%</u>
Total assets	<u>\$ 138,861</u>	<u>\$ 140,610</u>	<u>\$ (1,749)</u>	<u>-1.2%</u>
Liabilities:				
Accounts payable and accrued expenses	\$ 227	\$ 222	\$ 5	2.2%
Accrued holding costs	915	896	19	2.1%
Accrued demolition costs	161	161	0	0.0%
Deferred income - current	202	307	(105)	-34.1%
Accrued professional fees	<u>141</u>	<u>64</u>	<u>77</u>	<u>119.0%</u>
Current liabilities	<u>1,646</u>	<u>1,650</u>	<u>(4)</u>	<u>-0.3%</u>
Total liabilities	<u>1,646</u>	<u>1,650</u>	<u>(4)</u>	<u>-0.3%</u>
Net assets at end of period	<u>\$ 137,215</u>	<u>\$ 138,960</u>	<u>\$ (1,745)</u>	<u>-1.3%</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Administrative Division Statement of Changes in Net Assets For the Year to Date Period Ended June 30, 2022

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE
TRUST
ADMINISTRATIVE STATEMENT OF CHANGES IN NET ASSETS
All (All)
FOR THE YEAR TO DATE PERIOD ENDED JUNE2022
(Unaudited - amounts in thousands of U.S. dollars)**

	<u>JUNE2022</u>
Changes in net assets:	
Revenues:	
Rental and other income	\$ 1,975
Investment income	<u>1,394</u>
Total revenues	3,369
Expenses:	
Holding costs:	
Operating costs	481
Decommissioning costs	34
Separation costs	180
Property taxes	<u>332</u>
Total holding costs	1,027
Overhead costs:	
Facility costs, travel and other expenses	529
Insurance expense	268
Payroll and employee benefits	2,482
Redevelopment costs	<u>263</u>
Total overhead costs	3,542
Professional fees	377
Other expenses, net:	
Gain on disposal of property, plant and equipment	(6)
Real estate transaction and other costs	<u>172</u>
Total other expense, net	<u>166</u>
Total expenses, net	<u>5,112</u>
Change in net assets	(1,743)
Net assets at beginning of period	<u>138,960</u>
Net assets at end of period	<u>\$ 137,217</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Administrative Division Statement of Cash Flows For the Year to Date Period Ended June 30, 2022

**REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST
ADMINISTRATIVE STATEMENT OF CASH FLOWS
All (All)
FOR THE YEAR TO DATE PERIOD ENDED JUNE2022**

(Unaudited - amounts in thousands of U.S. dollars)

	<u>JUNE2022</u>
Operating activities:	
Change in net assets	\$ (1,743)
Adjustments to reconcile change in net assets to net cash used in operating activities:	
Gain on disposal of property, plant and equipment	(6)
Amortization of premium (discount) on investments in U.S. Treasury securities	(89)
Changes in assets and liabilities:	
Accrued interest receivable	20
Accounts receivable, net	19
Prepaid expenses	127
Accounts payable and accrued expenses	5
Accrued holding costs	18
Accrued professional fees	76
Deferred income	<u>(105)</u>
Net cash used in operating activities	<u>(1,678)</u>
Investing activities:	
Purchases of U.S. Treasury securities	(17,364)
Maturities of U.S. Treasury securities	6,400
Proceeds from disposal of land and building	<u>110</u>
Net cash used in investing activities	<u>(10,854)</u>
Decrease in cash and cash equivalents	(12,532)
Cash and cash equivalents at beginning of period	<u>15,189</u>
Cash and cash equivalents at end of period	<u>\$ 2,657</u>

PRIVILEGED AND CONFIDENTIAL: RACER Trust, RACER Properties LLC, and EPLET, LLC request treatment of the information contained in this document as Confidential Business Information exempt from release under FOIA Exemption 4.



Environmental Status Report

Updated Thru June 30, 2022

Table of Contents

DELAWARE	1
DE – State – Site 11900 - Former Wilmington Assembly Plant	2
ILLINOIS.....	3
INDIANA.....	4
IN – EPA – Site 12350 - Bedford Town Properties.....	5
IN – EPA – Site 12880 - Former GM Delco Plant 5	6
IN – State – Site 11910 - Indianapolis Stamping	7
IN – State – Site 13160 - Muncie Industrial Land	9
IN – State – Site 13200 - Delphi I Anderson	10
IN – State – Site 13250 - Former AGT Surface Impoundment.....	11
KANSAS	12
KS – State – Site 12891 - Fairfax ILF.....	13
MASSACHUSETTS	14
MA – State – Site 12900 - Framingham	15
MICHIGAN.....	16
MI – EPA – Site 10040 - Saginaw Nodular Industrial Land.....	17
MI – EPA – Site 11070 - Van Buren Landfill	18
MI – EPA – Site 11970/11210 - Pontiac N. Campus/Fiero.....	20
MI – EPA – Site 12950 - Buick City	23
MI – EPA – Site 12990 - Flint West	27
MI – EPA – Site 13020 - Eckles Road Site	29
MI – EPA – Site 13061 - PCC Validation.....	34
MI – State – Site 10010 - Pontiac EDC.....	37
MI – State – Site 10030 - Saginaw Malleable Iron	38
MI – State – Site 11000 - Bay City.....	40
MI – State – Site 11020 - Linden Road Landfill	41
MI – State – Site 11030 - Coldwater Road Landfill	42
MI – State – Site 11980 - Grand Rapids Stamping	46
MI – State – Site 11991 - Willow Run Plant	47
MI – State – Site 12910 - Hemphill Road Industrial Land	49

MI – State – Site 12970 - Windiate Park	50
MI – State – Site 13001 - Lansing Plant 2	51
MI – State – Site 30640 - CVO	56
MISSOURI	57
MO – State – Site 10070 - Leeds.....	58
NEW JERSEY	60
NJ – State – Site 10080 - Former Hyatt Clark Industries Property	61
NJ – State – Site 10090 - Ewing Township Industrial Land	62
NEW YORK	64
NY – EPA – Site 12000 - Massena NY	65
NY – State – Site 10100 - Former IFG Facility	67
NY – State – Site 11100 - Ley Creek PCB Dredgings.....	70
OHIO	71
OH – EPA – Site 10990 - Toledo 103C Landfill	72
OH – EPA – Site 13170 - Moraine Facilities.....	73
OH – State – Site 11110 - Elyria Closed Landfill	74
OH – State – Site 12030 - Parma Powertrain Assembly Plant	75

Acronym Definitions

A

ACM: Asbestos Containing Materials

B

BMP: Best Management Program

C

CA: Corrective Action

CACC: Corrective Action Complete with Controls

CACO: Corrective Action Consent Order

CAF: Corrective Action Framework

CAP: Corrective Action Plan

CEA: Classification Exception Area

CMI: Corrective Measures Implementation

CMP: Corrective Measures Proposal

CSC: Crotty Street Channel

CSM: Conceptual Site Model

cVOC: Chlorinated Volatile Organic Compound

D

DEGLE: State of Michigan Department of Environment, Great Lakes, and Energy, formerly Department of Environmental Quality

DGR: Dynamic Groundwater Recirculation

DMR: Discharge Monitoring Report

DRC: Declaration of Restrictive Covenant

E

EI: Environmental Indicators

ERA: Ecological Risk Assessment

ERC: Environmental Restrictive Covenant

ERD: Enhanced Reductive Dechlorination

EUC: Environmental Use Control

F

FDA: Former Disposal Area

FFS: Focused Feasibility Study

FPR: Free Product Recovery System

FSP: Former Storm Water Pond

G

GAC: Granular activated carbon

GLWA: Great Lakes Water Authority

GSI: Groundwater/Surface Water Interface

GSIPC: Groundwater Surface Water Interface Protection Criteria

H

HRC: Hydrogen Release Compound

I

IGMP: Interim GW Monitoring Plan

ILF: Industrial Landfill

IMWP: Interim Measures Work Plan

IRZ: In-Situ Reactive Zones

ISCO: In-situ Chemical Oxidation

ISCR: In-Situ Chemical Reduction

L

LNAPL: Light Non-Aqueous Phase Liquids

LTOMM: Long-Term Operation, Maintenance, and Monitoring

LTS: Long-Term Stewardship

M

MNA: Monitored Natural Attenuation

MSA: Materials Storage Area

N

NAPL: Non-Aqueous Phase Liquid

NFA: No Further Action

NOI: Notice of Intent

NPDES: National Pollutant Discharge Elimination System

NSZD: Natural Source Zone Depletion

O

OOC: Order of Conditions

P

PCB: Polychlorinated biphenyls

PDI: Pre-Design Investigation

PCE: Tetrachloroethene

PFAS: Per- and Poly-fluoroalkyl Substances

PMP: Pollutant Minimization Plan

PRB: Permeable Reactive Barrier

Q

QAPP: Quality Assurance Project Plan

R

RA: Remedial Alternatives

RAP: Response Activity Plan

RAR: Remedial Action Report

RFI: RCRA Facility Investigation

RIR: Remedial Investigation Report

ROW: Right of Way

S

SMA: Soil Management Area

SOW: Scope of Work

SPLP: Synthetic Precipitation Leaching
Procedure

SSDS: Sub-Slab Depressurization System

SWPPP: Storm Water Pollution Prevention
Plan

T

TAPS: DEGLE Technical Assistance and
Program Support Teams

TCE: Trichloroethylene

TSCA: Toxic Substances Control Act

V

VI: Vapor Intrusion

VOC: Volatile Organic Compound

Updated through June 30, 2022

DELAWARE

DE – State – Site 11900 - Former Wilmington Assembly Plant

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Dermody completed the majority of Site redevelopment activities. This included the construction of a second building and support areas which acted as the final OU-5 cap. BrightFields submitted the draft documentation letter for the OU-5 construction. Worked with DNREC and Dermody to revise the LTS Plan. This included Brightfields locating, and in some instances replacing, monitoring wells associated with groundwater monitoring plans for OU-4 and OU-5 that were damaged during the redevelopment.

Status

The site is now in LTOMM.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Dermody completed redevelopment activities with the construction of two buildings. Continued to work with off-Site properties to secure access for LTS activities. Submitted the revised LTS Plan, and DNREC approved. Completed and submitted a memorandum to detail funds needed to complete LTOMM activities, and DNREC approved.

Status

No change in status.

ILLINOIS

RACER has completed Environmental Action work at the following Site, and no further Environmental Action is planned or anticipated there. Therefore, this edition and future editions of the Environmental Action Status Reports does and will not include a separate section for this Site.

IL – State – Site 12330 – Danville LF

Updated through June 30, 2022

INDIANA

IN – EPA – Site 12350 - Bedford Town Properties

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Parcel 2 – Submitted the update to the Evaluation and Assessment of Environmental Impacts - Parcel 2 to EPA, which included all data collected since the initial submittal of the report in April 2017. This report concludes that there are no significant human health or ecological risks associated with the parcel and requests a no further action letter.

Parcel 39 (Restoration) – Met with IDEM on-site to evaluate the wetlands and an area that was disturbed by current owner's mowing or cutting. Call with IDEM to discuss such wetlands damage. Working on an amended ERC to identify restrictions that would mitigate potential future damage of the wetlands.

Worked on preparing the semi-annual progress report which detailed activities completed in the second half of 2021.

Status

Finalizing the wetlands-related ERC for the Parcel 39 restoration property and will share the draft ERC with IDEM for review.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Parcel 2 – EPA submitted comments to IDEM on the updated Evaluation and Assessment of Environmental Impacts - Parcel 2. No changes to the conclusions of the report were requested, which indicate no significant human health or ecological risks associated with the parcel and requests a no further action letter.

Parcel 39 (Restoration) – RACER and IDEM communicated regarding the evaluation of wetlands and an area that was damaged by the current property owner. RACER shared with IDEM an amended ERC to identify restrictions that would mitigate potential future damage of the wetlands. RACER is preparing updated draft ERCs by parcel for IDEM review.

RACER worked on preparing the semi-annual progress report to detail activities completed in the first half of 2022.

Status

RACER will continue to work with IDEM to evaluate the potential for closure of Parcel 39 and with EPA concerning the closure of Parcel 2. RACER will need to prepare and record an ERC for Parcel 2 if EPA agrees that no further action is required.

IN – EPA – Site 12880 - Former GM Delco Plant 5

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Completed a semi-annual groundwater monitoring event.

Prepared and submitted to USEPA the combined semi-annual progress and data report for the first half 2021. Worked on preparing the combined semi-annual progress and data report for the second half 2022.

Prepared a draft CMI Work Plan based on the final Corrective Measures identified in the USEPA Final Decision and Response to Comments. USEPA provided comments on the CMI Work Plan and working to address the comments.

Status

Continuing to collect groundwater samples on a semi-annual basis. Finalizing CMI Work Plan, preparing bid documents, completing site walks with prospective bidders, selecting contractor, and initiating implementation of the of the CMI Work Plan. Also drafting an ERC for the site and beginning the process for obtaining a well restriction overlay district.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Completed a semi-annual groundwater monitoring event during this reporting period. Prepared and submitted to USEPA the combined semi-annual progress and data report for the second half 2021. Worked on preparing the combined semi-annual progress and data report for the first half 2021.

RACER submitted the final CMI Work Plan incorporating comments from EPA. EPA approved the CMI Work Plan. RACER submitted a Request for Proposal to contractors to complete the work and selected (and entered into a contract with) Geo-Solutions, Inc. for implementation.

Status

Continuing to collect groundwater samples on a semi-annual basis And to implement the CMI Work Plan.

IN – State – Site 11910 - Indianapolis Stamping

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Worked with IEDC to complete the semi-annual groundwater sampling event for selected wells during this reporting period. Provided information to IEDC as needed to facilitate the environmental evaluation and potential redevelopment of the property. Worked with the Indianapolis Zoo to review its planned modification to the ERC placed on the property.

Vapor intrusion and mitigation activities south of the Site continued. RACER continued to monitor property transfers in the focus area and contact the new owners of transferred properties to explain the investigation activities and attempt to gain access to sample previously inaccessible residences. Two houses that require mitigation have sold and RACER is working to contact the new owners regarding the testing results. RACER completed VI sampling at two residential properties.

Status

Continuing to work with IDEM to evaluate groundwater data as it relates to vapor intrusion and develop plans for mitigation or retesting of off-Site homes, as needed, throughout the sampling activities. IDEM is continuing to work on an NFA determination letter that covers all on-Site SWMUs and AOCs (aka AOIs) for which all the work has been done.

RACER will prepare a 2021 Groundwater and Vapor Intrusion Summary Report for IDEM. RACER intends to modify the current groundwater monitoring plan based on analytical data trends and overall plume migration. RACER will work with IEDC as it redevelops the Site.

RACER will complete semi-annual groundwater sampling event during the first half of 2022.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Worked with IEDC to complete the semi-annual groundwater sampling event for selected wells during this reporting period. Provided information to the IEDC as needed to facilitate the environmental evaluation and potential redevelopment of the property. IEDC requested abandonment of six monitoring wells in the vicinity of the redevelopment efforts; IDEM and RACER approved the proposal and abandonment was completed. IDEM requested evaluation of hexavalent chromium and 1,4-dioxane in groundwater at the site. IEDC completed hexavalent chromium sampling at select wells to facilitate abandonment activities.

Worked with the Indianapolis Zoo to review its planned modification to the ERC that RACER placed on the property.

Vapor intrusion and mitigation activities south of the Site continued. RACER continued to monitor property transfers in the focus area and contact the new owners of transferred properties to explain the investigation activities and attempt to gain access to sample previously inaccessible residences. Two houses that require mitigation have sold and RACER has attempted to contact the new owner regarding the testing results. RACER completed VI sampling at two properties.

Status

Continuing to work with IDEM to evaluate groundwater data as it relates to vapor intrusion and develop plans for mitigation or retesting of off-Site homes, as needed, throughout the sampling activities. In 2016, IDEM issued a soil NFA for the Site. RACER awaits IDEM issuance of a No Further Action determination letter that covers all the on-Site SWMUs and AOCs (a.k.a. AOIs) for which all the work has been done.

RACER will prepare a 2021 Groundwater and Vapor Intrusion Summary Report for IDEM. RACER will update the groundwater monitoring plan as needed, based on analytical data trends and overall plume migration. RACER will work with IEDC as IEDC plans for redevelopment of the Site.

RACER will complete semi-annual groundwater sampling event during the second half of 2022.

IN – State – Site 13160 - Muncie Industrial Land

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Discussed initial comments from IDEM’s project manager, geologist, and risk assessor about two reports: the Groundwater Monitoring Report – Preliminary MNA Evaluation (GHD, November 2019) and the RCRA RFI Report (GHD, June 2014).

Completed low flow groundwater sampling of monitoring wells across the Site. Samples were submitted for analysis for VOCs and MNA parameters to support future CMP preparation.

Updated ERC based on IDEM comments.

Submitted draft PCB Summary Report to consolidate the available data and summarize the PCB concentrations in remaining concrete at the Site, such that USEPA and IDEM may support the implementation of related restrictions in RACER’s proposed ERC for the Site.

Status

Corrective Action continues at the Site and a CMP will be drafted after IDEM’s review of the RFI Report is complete.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Discussed comments from the IDEM on the RFI Report and draft ERC addressing PCBs remaining at the property.

Developed and executed a Work Plan for collecting concrete core samples to characterize and delineate PCB impacts in concrete floor samples at the former manufacturing facility. Results of the concrete core sampling were reviewed with IDEM to determine an appropriate remedial approach.

Updated the draft ERC following completion of the PCB Work Plan scope of work.

Status

Corrective Action continues at the Site and a CMP will be drafted once an approval for the RFI report is received.

IN – State – Site 13200 - Delphi I Anderson

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

The revised Groundwater Monitoring Plan was submitted to IDEM on September 29, 2021, and on December 7, 2021, IDEM provided comments on the document. The report is in the process of being finalized.

Status

IDEM has supported CA Determination for Tract A, Tract B (North), Tract B (Central), Tracts C to F, and Crawford Field. Corrective Action continues at the Site with IDEM oversight.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

As part of the corrective measure activities for the Site, the revised Groundwater Monitoring Plan was developed and was submitted to IDEM on March 15, 2022. The Groundwater Monitoring Plan was approved by IDEM on April 8, 2022. Corrective measures being conducted at the Site consist of routine groundwater and surface water monitoring and related reporting in accordance with the approved Groundwater Monitoring Plan. GHD completed groundwater and surface water sampling between April 24, 2022 and May 5, 2022.

The (ERC for Tract B (South) was prepared and was submitted to IDEM on February 3, 2022. On April 20, 2022, IDEM provided comments on the document. The revised ERC for Tract B (South) was re-submitted to IDEM on June 17, 2022.

Status

IDEM has supported CA Complete Determination for Tract A, Tract B (North), Tract B (Central), Tracts C to F, and Crawford Field. Corrective Action continues at the Site with IDEM oversight.

IN – State – Site 13250 - Former AGT Surface Impoundment

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Performed activities required by Post-Closure Permit. Completed RCRA inspections for third and fourth quarters and downloaded data from transducers placed in select monitoring wells. Completed the annual extraction well inspection and continued the groundhog trapping program (41 groundhogs total for 2021). Finalized the Groundwater Data Statistical Evaluation – 2021 Annual Sampling Report and submitted to IDEM on October 8, 2021. Started the 2021 Annual Report which will be submitted during the next reporting period. Prepared a draft ERC for IDEM’s review.

Status

Continuing to perform activities in accordance with the Post Closure Permit issued by IDEM.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Post-Closure Permit activities were completed. Completed RCRA inspections for first and second quarters and downloaded data from transducers placed in select monitoring wells. RACER continued the groundhog trapping program (8 groundhogs during first half of 2022). RACER submitted the 2021 Annual Report. RACER had discussions with IDEM and EPA regarding the potential sale of the property and prepared a draft Environmental Restrictive Covenant for IDEM’s review. The prospective purchaser of the property decided to withdraw their proposal based on EPA and IDEM’s interpretation of the RCRA regulations

Status

RACER will continue to complete activities in accordance with the Post Closure Permit issued by IDEM. RACER will continue the groundhog trapping program and will complete the annual O&M on the system. RACER will continue to work with IDEM to evaluate adjustments to the maintenance schedule or alternatives to the current permit requirements which can ensure the cap is not compromised while ensuring the budget for the site is not exhausted.

Updated through June 30, 2022

KANSAS

KS – State – Site 12891 - Fairfax ILF

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Completed a semi-annual long-term monitoring event from July 12 through July 14, 2021.

Prepared and submitted the July 2021 Semi-Annual Long-Term Groundwater Monitoring Report to KDHE on November 3, 2021.

Performed monitoring well O&M (hinge repair) and transported investigation-derived waste (purge water) to Waste Management's Johnson County Landfill in Shawnee, Kansas for disposal on December 21, 2021.

Completed the annual inspection to support the EUC on December 30, 2021.

Status

No change in status. Transitioning from semi-annual to annual long-term groundwater monitoring in accordance with the approved CAP and continuing to evaluate data from monitoring wells at the adjacent GM Fairfax Assembly Plant wells down-gradient of TMW-127 AOC.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Prepared and submitted to KDHE the 2021 annual inspection report to support the EUC recorded for the Site.

Status

No change in status. RACER will continue long-term groundwater monitoring as approved by Corrective Action Plan and continue to evaluate data from monitoring wells at adjacent GM Fairfax Assembly Plant wells down-gradient of TMW-127 AOC.

MASSACHUSETTS

MA – State – Site 12900 - Framingham

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

In accordance with OMM Plan, a semi-annual inspection, maintenance, and monitoring event was conducted (Year 15 Round 2) in September 2021. The event consisted of performing an inspection of the landfill and documenting and performing maintenance of the landfill cap and storm water control features, and collection of groundwater, sediment, and surface water samples. During the February 2020 OMM inspection, overgrown vegetation that could inhibit storm water flow was noted and removed. Submitted the Year 15 OMM Report for 2021.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

In accordance with the revised OMM Plan (revised August 2022), a semi-annual inspection was conducted in February 2022 (Year 16). The event consisted of performing an inspection of the landfill and documenting and performing maintenance of the landfill cap and storm water control features. A meeting was also conducted at the Site in May 2022 with the Framingham Conservation Commission to review the requirements of the Order of Conditions regarding maintenance of the Stormwater Management System and included updates to the OMM Plan.

Status

No change in status.

MICHIGAN

RACER has completed Environmental Action work at the following Sites, and no further Environmental Action is planned or anticipated there except for the monitoring of restrictive covenants. Therefore, this edition and future editions of the Environmental Action Status Reports does and will not include separate sections for each of these Sites.

MI – EPA – Site 10060 – Van Buren Vacant Land
MI – EPA – Site 11080 – Textile Road
MI – EPA – Site 11950 – GMPT Livonia
MI – EPA – Site 13080 – PCC-West
MI – State – Site 10020 – Romulus Engineering Center
MI – State – Site 10050 – Former Howard Warehouse
MI – State – Site 11010 – 6560 Cass Avenue
MI – State – Site 12920 – Davison Road Landfill
MI – State – Site 12940 – 6241 Cass Avenue
MI – State – Site 12960 – Dort Highway
MI – State – Site 12981 – GLTC Land
MI – State – Site 13100 – ACC Penske

MI – EPA – Site 10040 - Saginaw Nodular Industrial Land

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

IU G - Former Nodular Iron Plant OMM

None.

IU H - WWTF Closure

Submitted soils sample results summary for additional soil characterization in IU H on September 2, 2021. On September 16, 2021, USEPA responded with no comments.

IU I – Classified Sands

None.

RCRA Reporting and Other Reporting

Submitted semi-annual progress report to USEPA in October 2021.

Status

Limited monitoring and inspections are on-going. Future activities are dependent on USEPA's review of the memorandum on the potential uses of per- and polyfluoroalkyl substances and the CMP.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

IU G - Former Nodular Iron Plant OMM

None.

IU H - WWTF Closure

None.

IU I – Classified Sands

None.

RCRA Reporting and Other Reporting

Submitted semi-annual progress report to USEPA in April 2022.

Discussions continued with USEPA regarding sampling for PFAS at the Site.

Received request from USEPA to complete Michigan required five-year update of the mixing zone based GSI determination for ammonia and pH. Updated and submitted mixing zone determination for ammonia and pH to USEPA on March 22, 2022. USEPA provided comments on March 28, 2022 to which responses and a revised mixing zone determination update was submitted on May 18, 2022.

Status

Limited monitoring and inspections are on-going. Future activities are dependent on the outcome of discussions with USEPA regarding sampling for PFAS and any additional comments on the CMP.

MI – EPA – Site 11070 - Van Buren Landfill

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Agreements/Work Plans/Reports

Prepared a report documenting the results of the Spring 2021 groundwater monitoring and submitted it to USEPA on July 2, 2021. Began preparing a report documenting the results of the Fall 2021 groundwater monitoring.

Prepared comments on USEPA's Statement of Basis for Soil and Groundwater Cleanup at RACER Van Buren Township Landfill, September 2, 2021, and submitted to USEPA on September 30, 2021.

Prepared the Semi-Annual Progress Report for the Period of April 2021 through September 2021 and submitted it to USEPA on October 15, 2021.

Site Investigation

Completed the Fall semi-annual groundwater sampling event.

Status

Groundwater monitoring will continue to be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" (per CA 750) and to allow for evaluating concentration trends. Additional activities are dependent upon USEPA's progress on responding to any comments it received on the Statement of Basis and arriving at a Final Decision.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Agreements/Work Plans/Reports

Completed preparation of a report documenting the results of the Fall 2021 groundwater monitoring and submitted it to USEPA on January 13, 2022. Began preparing a report documenting the results of the Spring 2022 groundwater monitoring.

USEPA issued its Final Decision and Response to Comments, Remedy for Soil and Groundwater Contamination at RACER Van Buren Township Landfill, in March 2022.

Prepared the Semi-Annual Progress Report for the Period of October 2021 through March 2022 and submitted it to USEPA on April 18, 2022.

Prepared and submitted to USEPA a CMIP on May 18, 2022. USEPA approved the plan on May 26, 2022.

Site Investigation

Completed the Spring semi-annual groundwater sampling event.

Status

Updated through June 30, 2022

Site 11070 - Van Buren Landfill Cont'd

Groundwater monitoring will continue pursuant to the approved CMIP and efforts are underway to implement the other activities (i.e., eco-cover installation, surficial debris cleanup, and area water well/groundwater use restriction ordinance), in the CMIP. Additional activities are dependent upon issues that come up during implementation of the CMIP.

MI – EPA – Site 11970/11210 - Pontiac N. Campus/Fiero

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Corrective Measures – General & Institutional Controls

Prepared a response to USEPA's April 2, 2021, comments that the Agency provided based on its review of the Draft Corrective Action Summary Report submitted on March 8, 2021. Based on the comments and discussions with USEPA, initiated a data re-screening process against current DEGLE cleanup criteria for available soil, soil vapor, and groundwater data at each AOI identified at the Site. Data re-screening will establish the basis and framework for ensuing final decision process documentation.

Finalized, executed, and recorded an Amended and Restated DRC for the USPS parcel on December 17, 2021, the day ownership of the parcel was transferred to USPS.

Corrective Measures – Groundwater/LNAPL

Based on the results of ongoing investigation activities, completed preparation of a Fiero VI CSM Report and submitted to USEPA on September 8, 2021. Based on data gaps identified in the CSM, completed preparation of a Fiero Source Investigation SOW and submitted to USEPA on September 7, 2021. Upon approval, obtained a ROW permit from the City of Pontiac and commenced implementation of the SOW from October 11–27, 2021. Initial implementation activities included utility clearance, installation of fifty-seven (57) soil borings, twenty-three (23) vertical aquifer profile (VAP) borings, four (4) soil-vapor monitoring ports, two (2) monitoring wells, and sampling and analyzing soil, soil-vapor, and groundwater. Additional investigation and monitoring activities are planned for 2022, as well as continued evaluation and reporting activities.

Completed a follow-up LNAPL recovery system post-shutdown transmissivity test on November 29, 2021, to evaluate the feasibility of continued LNAPL recovery at recovery well RW-08-14. Similar to testing conducted in November 2020, three months after the recovery system shutdown, results indicated that continued or future recovery efforts were no longer feasible at this location. Submitted a Draft Technical Memorandum on December 21, 2021, which recommends dismantling the RW-08-14 LNAPL recovery system. The technical memorandum also recommends properly abandoning select monitoring wells at the USPS property which were historically installed for LNAPL delineation purposes but are no longer needed.

Corrective Measures – Groundwater Monitoring

Planned and completed the 2021 annual groundwater monitoring event from October 11-18, 2021. Began preparation of the 2021 Annual Groundwater Monitoring Report scheduled for completion in early 2022.

Storm Sewers/Montcalm Seep

Conducted routine O&M associated with the Montcalm Street Seep Control System from July through December 2021; seepage of groundwater from the Site onto Montcalm Street continues to be successfully prevented during this timeframe.

As of December 31, 2021, DEGLE has not provided any feedback on or responded to communications from RACER in regard to the NPDES permit application submitted to EGLE on

Site 11970/11210 - Pontiac N. Campus/Fiero Site Cont'd

March 30, 2021, that proposes discharging groundwater collecting in the Montcalm sump into the storm sewer system.

Joslyn Avenue Investigations

Abandoned five (5) temporary monitoring wells at the Joslyn Avenue North Parcel (not subject to RCRA Corrective Action) and prepared a Well Abandonment Summary Memorandum which was submitted to USEPA on December 20, 2021.

Completed a Draft Joslyn Avenue South Parcel Investigation Report (not subject to RCRA Corrective Action) on August 24, 2021, and submitted to USEPA and DEGLE for review. The draft report recommended additional subsurface investigation activities to delineate VOC impacts in soil and groundwater. Upon receiving approval to proceed from USEPA and EGLE, obtained a ROW permit from the City of Pontiac and completed investigation activities from November 29-December 10, 2021. Results are being analyzed and a summary report is expected to be submitted in early 2022.

Status

Continued progress was made in implementing corrective measures at the Site but the overall status has not changed.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Corrective Measures – General & Institutional Controls

Additional comments on the Draft Corrective Action Summary Report were received from USEPA via email transmittal in January and March 2022. Responses to comments were provided in March and May 2022. All responses to comments were accepted by USEPA on May 9, 2022.

Continued with the data re-screening process.

On April 15, 2022, prepared and submitted the 2021 Annual Site Inspection Report to USEPA and associated property owners. The report summarized property conditions, including deed restrictions, PCB cap areas, and monitoring well and Soil Vapor Monitoring Point conditions.

On January 14, 2022, submitted the Semi-Annual Progress Report to USEPA for July-December time period.

Corrective Measures – Groundwater/LNAPL

Based on the results of ongoing investigation activities, four (4) additional monitoring wells were installed and sampled to further delineate cVOC source areas at the former Fiero Plant 17 property in January 2022. In February 2022, four (4) additional vertical aquifer profile borings were installed and sampled in a transect near the southwest property boundary of the Former Fiero Powerhouse to help identify potential upgradient sources. One (1) additional monitoring well was installed at a key location on the Former Fiero Plant 17 property to better understand potential groundwater plume migration in March 2022. Prepared and submitted a draft Fiero Site Investigation Report on April 27, 2022. USEPA provided comments to the report via email transmittal on June 3, 2022. RACER is currently working to address the comments and the Site Investigation Report will be re-submitted to USEPA. Prepared and implemented a Temporary

Updated through June 30, 2022

Site 11970/11210 - Pontiac N. Campus/Fiero Site Cont'd

Monitoring Plan at the Former Fiero properties to collect additional groundwater data for trend analysis. The Final Temporary Monitoring Plan was submitted on February 23, 2022 and accepted by USEPA. The First and Second Quarter monitoring events were completed in March and June 2022. A data memo summarizing the First Quarter data was submitted to USEPA on May 20, 2022.

USEPA provided comments on the Draft Technical Memorandum for dismantling the RW-08-14 LNAPL recovery system via email transmittal on February 23, 2022. Responses to comments were provided on April 25, 2022. On May 31, 2022, USEPA provided additional comments via email. Updating the Technical Memorandum based on USEPA comments is in progress.

Corrective Measures – Groundwater Monitoring

Completed and submitted the Final 2021 Annual Groundwater Monitoring Report to USEPA and associated property owners on May 20, 2022.

Storm Sewers/Montcalm Seep

Conducted routine O&M associated with the Montcalm Street Seep Control System from January through June 2022; seepage of groundwater from the Site onto Montcalm Street continues to be successfully prevented during this timeframe.

As of June 30, 2022, DEGLE has indicated that the NPDES permit application submitted to DEGLE on March 30, 2021, is still in the review process. This permit proposes discharging groundwater collecting in the Montcalm sump into the storm sewer system.

Joslyn Avenue Investigations

Submitted a request to DEGLE for Site Specific Volatilization to Indoor Air Criteria (SSVIAC) for the Joslyn Avenue South Parcel on February 22, 2022. Residential SSVIAC for the Joslyn Avenue South Parcel were received on April 21, 2022.

Using the SSVIAC, continued preparation of a Joslyn Avenue South Parcel Summary Report, detailing the additional activities completed in December 2021 and First Quarter groundwater sampling results. Based on the results of the additional investigation activities, it was necessary to submit a Notice of Migration to the City of Pontiac and DEGLE for the Lenox Street Right of Way and a City of Pontiac owned alley. The Notices of Migration were submitted to the City of Pontiac and DEGLE on March 11, 2022.

Planned and completed First and Second quarter sampling of monitoring wells installed at the Joslyn South Parcel in January and June 2022.

Status

Continued progress was made in implementing corrective measures at the Site, but the overall status has not changed.

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Outfalls 003/004 Oil Removal Systems

Continue to perform operation and weekly inspections of the Outfall 003/004 System. Completed jet cleaning of 003/004 system sewer diversion pipe to remove blockages and improve flow.

Prepared and submitted 003/004 Oil Removal work plan to DEGLE on September 7, 2021.

Select Surface Recovery Inspection Completed the semi-annual select surface cover inspection.

Maintain Booms on Outfalls

Completed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005.

Completed inspections and maintenance (as necessary) of the oil interceptor #2. Prepared and submitted oil interceptor #2 decommissioning work plan to DEGLE on December 7, 2021.

Agency Coordination/Negotiation, Reporting, and Project Management/Coordination

Held a conference call with DEGLE on July 26, 2021, to provide an update on PFAS investigations and path forward.

Held a conference call with DEGLE and City of Flint on August 10, 2021, to discuss the planned Hamilton Avenue work and path forward, and Leith Street and lagoon evaluations.

Held a conference call with DEGLE on September 17 and October 20, 2021 to provide updates for PFAS investigations, lagoon evaluations, and sewer remedy implementation and to prepare for a scheduled public information meeting.

Prepared and submitted the Semi-Annual Progress Report on October 15, 2021.

Held a public information meeting with USEPA, DEGLE, and the City of Flint on October 21, 2021, to discuss PFAS investigations, community engagement, and general status of environmental activities.

Prepared and submitted Hamilton Avenue Sanitary and Storm Sewer Permanent Plug Work Plan to DEGLE on November 24, 2021.

Prepared and submitted Tracer Injection Test Work Plan to DEGLE on November 29, 2021.

Held a conference call with DEGLE on December 10, 2021, to discuss corrective action management units and lagoon evaluation updates.

Held a conference call with DEGLE TAPS team on December 14, 2021, to discuss the tracer test work plan.

Compliance

Site 12950 - Buick City Cont'd

Collected weekly NPDES permit samples from the Outfall 003A monitoring point.

Conducted SWPPP semi-annual inspection.

Remedy Design, Implementation, and OMM

Continued data collection and remedy evaluation for Outfall 005/Leith Street PFAS impacts from July-December 2021.

Continued soil investigations for benzo(a)pyrene impacts in July, September, and December 2021.

Completed slug and pumping tests in November 2021 at Building 04 area to evaluate hydraulic conductivities.

Completed repairs to the Outfall 002 connection piping in November 2021.

Began completing punch list items related to the Outfall 003 Storm Sewer Reroute.

Collected geotechnical samples at the lagoon area in November-December to aid in evaluation of lagoon reuse options.

Performed soil sampling for analysis of TOC in December 2021 for use during evaluation of remedy options.

Collected additional soil samples from property boundaries and waste management units in December 2021 to refine limits of areas to be identified in a restrictive covenant.

PFAS Investigation

Implemented PFAS investigation activities in July-December 2021. Work included gauging and sampling existing monitoring wells, installation of new monitoring wells, collecting soil and groundwater samples, evaluating onsite lagoons, video inspection of the sanitary and storm sewers, and collecting storm sewer samples.

Continued lagoon soil and groundwater investigations including advancing additional soil borings, collecting lithology measurements, and installing five deep groundwater monitoring wells near the lagoons from October-December 2021.

Continued to evaluate groundwater daylighting issues and installed berm to prevent daylighting groundwater from flowing onto to Hamilton Avenue.

Installed permanent bulkheads at various manholes along Outfall 010 and Outfall 011 in December 2021.

Continued to discuss with various vendors remedial strategies to contain, treat, or destroy PFAS including Battelle (Annihilator), AquaBlok (soil stabilization), LafargeHolcim (soil encapsulation), Calgon (carbon filtration), Evocra (groundwater ozofractionation), Central Michigan University (bioremediation), and Clean Earth Technologies (soil washing).

Site 12950 - Buick City Cont'd

Completed multiple sampling events that included collecting samples from storm sewers, sanitary sewers, surface runoff, monitoring wells, lagoon water and sediment, and soils.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Outfalls 003/004 Oil Removal Systems

Continue to perform operation and weekly inspections of the Outfall 003/004 System.

Performed Outfall 003/004 System decommissioning from April 25 – April 29, 2022.

Select Surface Recovery Inspection: Completed the semi-annual select surface cover inspection.

Maintain Booms on Outfalls

Completed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005.

Completed inspections and maintenance (as necessary) of the oil interceptor #2.

Agency Coordination/Negotiation, Reporting, and Project Management/Coordination

Held a conference call with DEGLE on February 7, 2022, to discuss site redevelopment, site parceling, and waste management units.

Held a conference call with DEGLE on March 17, 2022, to discuss waste management units, Materials Management Plan, and upcoming site activities.

Prepared and submitted the Parcel 4 Memo and AOC Policy to DEGLE on April 12, 2022.

Prepared and submitted the Semi-Annual Progress Report on April 15, 2022.

Held a conference call with USEPA May 2, 2022, to provide an update and review PCB restrictive covenants.

Held a conference call with DEGLE May 9, 2022, to provide an update on PFAS investigations, lagoon evaluations, parceling updates, and areas of concern.

Held a conference call with DEGLE on May 13, 2022, to provide an update on progress, upcoming work, and the remediation schedule.

Prepared and submitted response comments related to DEGLE-WRD Administrative Order of Consent (ACO) on June 13, 2022.

Compliance

Collected weekly NPDES permit samples from the Outfall 003A monitoring point.

Site 12950 - Buick City Cont'd

Conducted SWPPP semi-annual inspection.

Prepared and submitted the Annual Wet Weather Trend Report and the Annual PCB PMP Report to DEGLE on May 13, 2022.

Remedy Design, Implementation, and OMM

Continued data collection and remedy evaluation for Outfall 005/Leith Street PFAS impacts from January-March 2022.

Collected additional soil samples from property boundaries and waste management units in February-May 2022 to refine limits of areas to be identified in a restrictive covenant.

Installed permanent bulkheads and bulkhead repairs at various manholes along Outfall 011 and Outfall 013 in January and April-June 2022.

Prepared and submitted the Workplan for Removal of Water from Former East Lagoon and Stabilization of Sediments to DEGLE on May 4, 2022.

PFAS Investigation

Implemented PFAS investigation activities from January-June 2022. Work included gauging and sampling existing monitoring wells, installation of new monitoring wells, collecting soil and groundwater samples, evaluating onsite lagoons, video inspection of the sanitary and storm sewers, and collecting storm sewer samples.

Prepared and submitted Additional Lagoon Investigation Work Plan to DEGLE on February 3, 2022.

Continued lagoon soil and groundwater investigations including advancing additional soil borings, characterizing lithology, and dewatering the east lagoon from January-June 2022.

Continued to discuss with various vendors remedial strategies to contain, treat, or destroy PFAS including Battelle (Annihilator), AquaBlok (soil stabilization), LafargeHolcim (soil encapsulation), Calgon (carbon filtration), Evocra (groundwater ozofractionation), Central Michigan University (bioremediation), and Clean Earth Technologies (soil washing).

Completed multiple sampling events that included collecting samples from storm sewers, sanitary sewers, surface runoff, monitoring wells, lagoon water and sediment, and soils.

Status

No change in status.

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Groundwater Monitoring

Sampled all monitoring wells from September 14-16, 2021. Analyzed samples for VOCs and the following metals (total and dissolved); arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc. In addition, analyzed for PFAS samples from monitoring wells MW-100S, MW-101S, MW-103S, MW-106SR, MW-107S, MW-109S, MW-110S, MW-111S, MW-112S, MW-113S, and MW-114S.

PFAS Subsurface Investigation

Installed three new monitoring wells (MW-115S, MW-116S, and MW-117S) on-Site and along the county recreation trail on November 10, 2021. Locations were selected based on the results of the April 2021 subsurface investigation to improve the characterization and delineation of the PFAS contamination.

Agency Coordination/Negotiation, Reporting & Project Management

Prepared the First Half 2021 Progress Report and submitted to USEPA on July 15, 2021.

Prepared Data Report summarizing the September 2021 groundwater monitoring event and submitted to USEPA on November 22, 2021.

Began preparation of a summary report for the monitoring well installation and sampling in November 2021.

Status

Completed HRC Pilot Test post-injection sampling/analysis; HRC appears to be able to enhance naturally occurring degradation of VOCs. USEPA's preparation of a Statement of Basis for selection of final corrective measures is on hold pending results of the PFAS investigation. The additional monitoring wells installed and sampled this period will help to move the PFAS investigation to completion. Final Corrective Measures for non-PFAS impacts are expected to include injection of HRC to enhance attenuation of VOCs, groundwater monitoring, and deed restrictions.

Future work is dependent on USEPA's progress preparing the Statement of Basis and evaluation of monitoring and PFAS investigation results.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Groundwater Monitoring

Sampled monitoring wells MW-103S, MW-104S, MW-106SR, MW-108S, MW-110S, MW-112S, MW-114S and MW-117S on March 16, 2022. Analyzed samples for VOCs and the following metals (total and dissolved); arsenic, chromium (total and hexavalent), copper, lead, selenium, and zinc. In addition, analyzed samples for PFAS from monitoring wells MW-103S, MW-106SR, MW-110S, MW-112S, MW-114S and MW-117S.

Site 12990 – Flint West Cont'd

Agency Coordination/Negotiation, Reporting & Project Management

Prepared the Second Half 2021 Progress Report and submitted to USEPA on January 14, 2022.

Prepared Data Report summarizing the March 2022 groundwater monitoring event and submitted to USEPA on May 13, 2022.

Prepared the November 2021 Subsurface Investigation report and submitted to USEPA on January 27, 2022

As USEPA did not have any comments on the PFAS investigation results, began preparation of a revised CMS report to incorporate PFAS-related information.

Status

USEPA's preparation of a Statement of Basis for selection of final corrective measures is on hold pending revisions to the CMS to include PFAS information. Final Corrective Measures for non-PFAS impacts are expected to include injection of HRC to enhance attenuation of VOCs, groundwater monitoring, and deed restrictions.

Future work is dependent on submittal and USEPA's review of the revised CMS, USEPA's progress preparing the Statement of Basis, and evaluation of monitoring results.

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Corrective Action OMM

Continued groundwater pumping operations to manage groundwater elevations within the Area 1 soil-bentonite barrier wall during Area 1 Interim Measure implementation. Approximately 2,131,546 gallons of groundwater were collected and discharged from July-December 2021. Continuing to use GAC for treatment of PFAS, as required by a February 2020 revised permit issued by GLWA for the discharge of groundwater from the Site. The groundwater treatment equipment (bag filters and GAC vessel) was relocated outside the former GWTP building to allow for demolition/redevelopment and a new pump and controls were installed as part of Area 1 Interim Measures activities. Conducted monitoring of effluent and reported results as required. Collected groundwater elevation measurements periodically within Area 1 to evaluate groundwater elevations. Completed GAC change-out on December 1, 2021. Completed Semi-Annual reporting to GLWA and USEPA.

Off-Site (AOI31) Vapor Intrusion Evaluation

Continued evaluation of comments from USEPA on the Work Plan for In Situ Chemical Oxidation Remediation of Trichloroethene Groundwater Plume – Eckles Road Facility -- considering a shift toward a pilot project and alternative remediation strategy. Met with new homeowners at Homes 6 and 23 to review vapor intrusion information.

Conducted annual groundwater sampling activities as part of USEPA-approved Groundwater Monitoring Plan for AOI 31 and collected soil vapor samples at AOI 31 properties/homes in December 2021.

Conducted an operational and performance inspection of the vapor mitigation subslab depressurization system at the residence identified as Home 8 on August 30, 2021, and at the residence identified as Home 7 on October 29, 2021.

Area 1 Remedy Implementation

The Area 1 Interim Measure, which integrates a capping remedy including a contingency for groundwater removal and PFAS treatment with redevelopment, was implemented and nearly completed.

Installed off-Site monitoring well as detailed in USEPA-approved June 30, 2021, scope of work for additional groundwater sampling related to Area 1. Completed construction groundwater elevation monitoring and sampling according to USEPA-approved February 15, 2021, Area 1 Redevelopment/Construction Groundwater Monitoring Plan, to evaluate groundwater conditions during demolition and construction activities. Per a request from DEGLE, boron was added as a constituent of concern for groundwater and has been detected above criteria.

Met with USEPA and DEGLE by videoconference, on July 22, 2021 and August 19, 2021, to discuss questions and comments on the Interim Measures Work Plan – Area 1 – Former Plating Area and provide an update on Construction Status, Materials Management Plan details, and additional Work Plan details.

Site 13020 – Eckles Road Cont'd

Submitted the Revised Interim Measures Work Plan for Area 1 to USEPA and DEGLE on July 20, 2021, and USEPA approved the plan on September 29, 2021. Submitted a Liner System Installation Construction Quality Assurance/Quality Control Plan to USEPA and DEGLE on September 3, 2021.

The new owner continued redevelopment activities, including site preparation, installation of foundations, geopiers, wall panels, and roofing for the approximately 365,000 square foot building within the Area 1 soil-bentonite barrier wall. Installed Site utilities, including penetrations and repairs to the Area 1 soil-bentonite barrier wall.

Installed approximately 35,000 square yards of geotextile, HDPE liner, drainage layer, and cover material over the area between the newly constructed building and the existing Area 1 soil-bentonite barrier wall, including drainage trench and laterals. Completed dipole (i.e., leak) testing and destructive seam tests to confirm liner, seam, boot, and repair integrity.

Submitted supplemental Materials Management Plan information to USEPA and DEGLE on November 3, 2021.

PFAS

The Area 1 integrated capping/redevelopment option will, when completed, address PFAS groundwater impacts within the Area 1 soil-bentonite barrier wall.

Received USEPA approval of the proposed additional off-site monitoring well installation and groundwater sampling included in the June 30, 2021, draft Groundwater Characterization Activities and Review of Subsurface Conditions Memorandum on August 18, 2021. Obtained ROW permit to install monitoring wells in the ROW and completed well installation in December 2021. Contacted off-Site property owner and made progress toward obtaining an access agreement to allow for well installation and sampling on that property.

Collected groundwater samples as part of the Area 1 Construction Groundwater Monitoring Plan to monitor PFAS groundwater impacts and effectiveness of the Area 1 soil-bentonite barrier wall and integrated cap.

Status

Treated in situ groundwater concentrations of chromium and nickel at Area 1, which have significantly decreased. Influent concentrations in the GWTP are below GLWA discharge permit limits for chromium and nickel and therefore chemical treatment of groundwater is no longer needed, however treatment for PFAS is necessary. The GWTP components were relocated to a Conex box to allow for demolition of the former GWTP building and support redevelopment. A new pump and controls were installed as part of the relocation activities.

Activities to address chromium, nickel, boron, and PFAS groundwater impacts within the Area 1 soil-bentonite barrier wall were implemented as part of an integrated remediation and redevelopment plan. The interim measures plan includes a geomembrane liner/building cap over Area 1 to minimize infiltration from precipitation and significantly reduce or eliminate the need to remove groundwater from within the Area 1 soil-bentonite barrier wall. At the request of USEPA, regular groundwater pumping from the existing French drain has been ongoing since February 2021 to manage groundwater elevations during Site demolition and construction

Site 13020 – Eckles Road Cont'd

activities. If it becomes necessary to remove groundwater from within Area 1 after groundwater levels stabilize post-construction, two contingency options are available. Future activities for Area 1 are dependent upon coordination with the developer and reviews and comments from USEPA, DEGLE, and GLWA.

PFAS, chromium, nickel, and boron groundwater impacts associated with Area 1 but outside of the Area 1 soil-bentonite barrier wall need to be further characterized and evaluated. Future activities for these groundwater impacts are dependent upon the results of additional investigations and reviews and comments from USEPA.

TCE groundwater concentrations at AOI 31 are decreasing over the long-term at some monitoring locations but recent investigations have identified areas of stable and higher concentrations, and the impacts appear to be migrating farther downgradient and levels vary at depth within the saturated zone. The timing of further activities is not clear and are dependent upon on-going annual groundwater and soil vapor monitoring results and developing a response to USEPA's comments on the August 2019 Work Plan for In Situ Chemical Oxidation. Based on USEPA's comments, a pilot project and an alternative remediation technology are being considered. The objective of in situ remediation is to reduce off-site TCE concentrations in groundwater and thereby reduce the potential for longer-term vapor intrusion monitoring and mitigation requirements.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Corrective Action OMM

Continued groundwater pumping operations to manage groundwater elevations within the Area 1 soil-bentonite barrier wall during Area 1 Interim Measure implementation. Approximately 2,064,241 gallons of groundwater were collected and discharged from January-June 2022. Continuing to use GAC for treatment of PFAS, as required by a February 2020 revised permit issued by GLWA for the discharge of groundwater from the Site. Conducted monitoring of effluent and reported results as required. Collected groundwater elevation measurements periodically within Area 1 to evaluate groundwater elevations. Completed Semi-Annual reporting to GLWA and USEPA.

Off-Site (AOI31) Vapor Intrusion Evaluation

Continued evaluation of comments from USEPA on the Work Plan for In Situ Chemical Oxidation Remediation of Trichloroethene Groundwater Plume – Eckles Road Facility -- considering a shift toward a pilot project and alternative remediation strategy. Participated in virtual meetings with USEPA on January 12, 2022 to discuss AOI 31 Vapor Intrusion evaluation activities and in March 2022 to discuss summarizing long-term monitoring data collected from 2013-2021 in a "Personally Identifiable Information" format.

Area 1 Remedy Implementation

The Area 1 Interim Measure, which integrates a capping remedy including a contingency for groundwater removal and PFAS treatment with redevelopment, was implemented in 2021 and remaining building construction activities were completed during the first half of 2022.

Site 13020 – Eckles Road Cont'd

Installed off-Site monitoring well as detailed in USEPA-approved June 30, 2021, scope of work for additional groundwater sampling related to Area 1. Completed post-construction groundwater elevation monitoring and sampling according to USEPA-approved February 15, 2021, Area 1 Redevelopment/Construction Groundwater Monitoring Plan and performance groundwater monitoring according to USEPA-approved Revised Interim Measures Work Plan (July 2021). The data will allow for evaluation of groundwater conditions following construction activities. Per a request from EGLE, boron was added as a constituent of concern for groundwater and has been detected above criteria.

Submitted supplemental Materials Management Plan information to EGLE in a memorandum dated February 17, 2022. EGLE approved the Materials Management Plan in a letter dated February 18, 2022. Provided an email update to USEPA on March 11, 2022, regarding groundwater elevation measurements, groundwater monitoring schedules, and anticipated Area 1 Interim Measures implementation reporting.

PFAS

The completed Area 1 integrated capping/redevelopment option will address PFAS groundwater impacts within the Area 1 soil-bentonite barrier wall.

Collected groundwater samples from off-site monitoring wells installed as proposed in the June 30, 2021, draft Groundwater Characterization Activities and Review of Subsurface Conditions Memorandum on August 18, 2021. PFAS was not detected at concentrations greater than EGLE drinking water criteria or GSI criteria in off-site monitoring well or storm sewer samples collected during 2022.

Collected groundwater samples as part of the Area 1 Construction Groundwater Monitoring Plan Revised Interim Measures Work Plan to monitor PFAS groundwater impacts and effectiveness of the Area 1 soil-bentonite barrier wall and integrated cap.

Status

Treated in situ groundwater concentrations of chromium and nickel at Area 1, which have significantly decreased. Influent concentrations in the GWTP are below GLWA discharge permit limits for chromium and nickel and therefore chemical treatment of groundwater is no longer needed, however treatment for PFAS is necessary and continues.

Activities to address chromium, nickel, boron, and PFAS groundwater impacts within the Area 1 soil-bentonite barrier wall were implemented as part of an integrated remediation and redevelopment plan. The interim measure includes a geomembrane liner/building cap over Area 1 to minimize infiltration from precipitation and significantly reduce or eliminate the need to remove groundwater from within the Area 1 soil-bentonite barrier wall. At the request of USEPA, regular groundwater pumping from the existing French drain has been ongoing since February 2021 to manage groundwater elevations during Site demolition and construction activities. If it becomes necessary to remove groundwater from within Area 1 after groundwater levels stabilize post-construction, two contingency options are available. Future activities for Area 1 are dependent upon groundwater monitoring results, and reviews and comments from USEPA, DEGLE, and GLWA.

Site 13020 – Eckles Road Cont'd

PFAS groundwater impacts associated with Area 1 outside the soil bentonite barrier wall have been characterized and were not detected above GSI criteria in the off-site storm sewer. Nickel, and boron groundwater impacts associated with Area 1 but outside of the Area 1 soil-bentonite barrier wall need to be further characterized and evaluated. Future activities for these groundwater impacts are dependent upon groundwater monitoring results, and reviews and comments from USEPA.

TCE groundwater concentrations at AOI 31 are decreasing over the long-term at some monitoring locations but recent investigations have identified areas of stable and higher concentrations, and the impacts appear to be migrating farther downgradient and levels vary at depth within the saturated zone. The timing of further activities is not clear and are dependent upon on-going annual groundwater and soil vapor monitoring results and developing a response to USEPA's comments on the August 2019 Work Plan for In Situ Chemical Oxidation. Based on USEPA's comments, a pilot project and an alternative remediation technology are being considered. The objective of in situ remediation is to reduce off-site TCE concentrations in groundwater and thereby reduce the potential for longer-term vapor intrusion monitoring and mitigation requirements.

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Groundwater Monitoring

Performed the third quarter 2021 groundwater sampling event in September 2021. In accordance with the USEPA-approved reduced groundwater monitoring plan, monitoring wells MW-72I-19 and MW79D-19 were sampled and analyzed for VOCs during the quarterly event. The September 2021 results will be included in the annual sampling summary report to be prepared during the third quarter of 2022.

Submitted to USEPA the draft annual groundwater sampling summary report for the third quarter of 2020 through the second quarter of 2021 in October 2021 and finalized the report in November 2021.

Continued discussions with USEPA and Site owner regarding replacement of several wells, which had been abandoned in 2015 to allow for redevelopment. A memorandum summarizing the scope of work for the final phase well reinstallation was provided to and approved by USEPA on December 14, 2021.

PCB Soils Closure

Revision of the current DRC is in pending and will be provided to USEPA and DEGLE for review and then recorded to complete activities related to PCB-impacted soils.

Corrective Action Reporting

Finalized draft June 2021 memorandum summarizing information to date related to the LNAPL area in August 2021.

Began updating draft April 2020 CMP to reflect information obtained since that time.

Additional Investigation Activities

The soil vapor investigation for a small portion of the southern Site boundary continued in accordance with the February 2021 summary memorandum, which proposed quarterly soil gas sampling until four consecutive quarterly sampling events of sampling with no VOC exceedances had occurred. USEPA concurred with that proposal via email on February 11, 2021. The third of four quarterly soil gas sampling events was completed in July 2021. A memorandum summarizing the results was provided to USEPA in September 2021. The fourth quarterly soil gas sampling event was completed in September 2021 and a draft memorandum summarizing the results was provided to USEPA in December 2021. Four quarterly soil gas sampling events have been completed without a VOC exceedance; therefore, no further soil gas sampling activities are proposed at this time.

Status

Groundwater monitoring is expected to continue per the reduced monitoring plan, and a third phase of monitoring well installation is anticipated to occur in 2022. Future activities to address groundwater are dependent on groundwater monitoring results.

Site 13061 – PCC Validation Cont'd

Revision of the current DRC and the draft April 2020 CMP are needed to address the findings of the April 2021 data evaluation and, specific to the DRC, revision is needed to account for the remedy for PCB-impacted soil.

The need for any other activities to obtain a RCRA CACC determination from USEPA is dependent upon USEPA's review of a revised CMP, groundwater monitoring results, and associated discussions.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Groundwater Monitoring

Conducted the comprehensive annual groundwater sampling event in April 2022 in accordance with the USEPA-approved reduced groundwater monitoring plan and began preparation of the 2022 Annual Groundwater Sampling Report.

Reporting

Prepared and submitted a revised soil gas sampling memo for the fourth consecutive quarterly event (3rd quarter 2021 event), on February 4, 2022.

Updated the VI CSM based on USEPA comments and submitted on March 17, 2022

Monitoring Well Reinstallation

Completed reinstallation activities for five (5) monitoring wells, advancement of one (1) 60 foot deep boring, and installation of an additional shallow monitoring well in April 2022. The reinstallation and other drilling activities will be documented in the 2022 Annual Groundwater Sampling Report.

PCB Soils Closure

Revision of the current DRC is in pending and will be provided to USEPA and DEGLE for review and then recorded to complete activities related to PCB-impacted soils.

Corrective Action Reporting

Continued updating draft April 2020 CMP to reflect information obtained since that time.

Status

Groundwater monitoring is expected to continue per the reduced monitoring plan and newly installed monitoring wells. Future activities to address groundwater are dependent in part on groundwater monitoring results.

Revision of the current DRC and the draft April 2020 CMP are needed to address the findings of the April 2021 data evaluation, groundwater and soil vapor monitoring data, and, specific to the DRC, revision is needed to account for the remedy for PCB-impacted soil.

The need for any other activities to allow USEPA to prepare a Statement of Basis and proceed with its final decision process and subsequently obtain a RCRA CACC determination from USEPA

Updated through June 30, 2022

Site 13061 – PCC Validation Cont’d

is dependent upon USEPA’s review of a revised CMP, groundwater and soil vapor monitoring results, and associated discussions.

MI – State – Site 10010 - Pontiac EDC

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Final Risk-Based NFA Request Reporting Activities

Completed preparation of the draft NFA Request package for the North Mill Street ROW Area located west of the Site. Initiated the process of obtaining signatures and finalizing the package for submittal to EGLE in early 2022.

Status

Progress was made toward submitting the NFA package but otherwise no change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Final Risk-Based NFA Request Reporting Activities

Submitted the NFA Request package for the North Mill Street ROW Area located west of the Site in January 2022. EGLE provided a Notice of Approval of the NFA Request on June 8, 2022.

Status

Based on DEGLE's approval of the NFA Request for the North Mill Street ROW, the only remaining activities are to properly abandon the five (5) monitoring wells within the right-of-way area and monitor compliance with the restrictive covenant.

MI – State – Site 10030 - Saginaw Malleable Iron

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

LNAPL Recovery System Installation

Completed gauging of the Quench Pit LNAPL Area monitoring wells and manholes in the Southwest Plant LNAPL Area on August 16, 2021.

Implement RAP, Site OMM

Completed well modifications and maintenance to twenty-four damaged monitoring well protective covers on September 7-9, 2021.

Prepared & submitted Five Year Mixing Zone Review to DEGLE for renewal on September 23, 2021.

Performed the annual groundwater monitoring event from August 16-24, 2021.

Inspected the Former Plant Slab Soil Cover Area, I27.7 Manhole Area, Quench Pit Area, Former Southwest LNAPL Area, and the Green Point Landfill on August 16, 2021. Inspected the Former Railyard Area soil cover, Stormwater Pond, and River Berm Area on August 23, 2021. Inspected the two Terminated Type III Landfills on August 24, 2021.

Completed reinstallation of eight monitoring wells at the Peninsula Property on November 1-2, 2021.

Completed installation of three permanent markers in coordination with MDNR site development on November 3, 2021.

Performed Stormwater Pond liner maintenance including installation of a GeoWeb® to provide liner cover protection and slope stabilization on November 15-16, 2021.

Completed installation of the fourth required permanent marker (South Marker) on December 9, 2021.

Prepared and submitted the annual progress report to DEGLE on December 15, 2021.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

LNAPL Recovery System Installation

No activity during this period.

Implement RAP, Site OMM

Updated through June 30, 2022

Site 10030 - Saginaw Malleable Iron Cont'd

Completed an aerial inspection of vegetated soil covers for the Former Plant Slab soil cover, the two Type III Landfills, the River Berm Area, Green Point Landfill, Peninsula Property, and the Former Railyard Area soil cover and Monitoring Well network condition on June 29, 2022.

Status

No change in status.

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Revision to RAP, Consent Judgment, and OMM Plan

Installation of permanent markers will follow completion of storm water modifications required as part of separating current storm water system from that of adjacent facility owned and operated by GM, LLC. Information obtained during evaluation of storm water modifications indicates the recorded DRC needs to be revised to account for slight differences in exposure barrier, slurry wall locations, storm water modifications, and other clarifications.

Hydraulic Control & Treatment of Extracted Groundwater to PCB Permit Limits

Continued to operate the groundwater extraction and treatment system.

Site Operation & Maintenance Activities

Completed required monthly inspections of the cap and containment system, as well as maintenance and level monitoring of CSC and MSA groundwater extraction systems.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Revision to RAP, Consent Judgment, and OMM Plan

Installation of permanent markers will follow completion of storm water modifications required as part of separating current storm water system from that of adjacent facility owned and operated by GM, LLC. Information obtained during evaluation of storm water modifications indicates the recorded DRC needs to be revised to account for slight differences in exposure barrier, slurry wall locations, storm water modifications, and other clarifications.

Hydraulic Control & Treatment of Extracted Groundwater to PCB Permit Limits

Continued to operate the groundwater extraction and treatment system.

Site Operation & Maintenance Activities

Completed required monthly inspections of the cap and containment system, as well as maintenance and level monitoring of CSC and MSA groundwater extraction systems.

Status

No change in status.

MI – State – Site 11020 - Linden Road Landfill

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

OMM and Reporting

The 2021 annual soil cover inspection was completed, and the inspection results were summarized and submitted to DEGLE on October 7, 2021. No significant issues were identified during the inspection.

The soccer association leasing the Site performed necessary maintenance of the soil and vegetative cover.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

OMM and Reporting

The soccer association leasing the Site performed necessary maintenance of the soil and vegetative cover.

The 2022 annual soil cover inspection will be completed in Fall 2022.

Status

No change in status.

MI – State – Site 11030 - Coldwater Road Landfill

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Continue Ongoing Landfill OMM

Performed routine Landfill OMM and prepared and submitted the required reports.

Performed the annual groundwater monitoring well and leak detection vault sampling during the week of November 3, 2021. The annual reports documenting the results of the event will be submitted to DEGLE in the first quarter of 2022.

Vapor Investigation

Performed the third and fourth quarter soil vapor sampling events on August 26, 2021 and December 8, 2021. A technical memorandum documenting the results of the third quarter sampling was submitted to DEGLE on December 2, 2021. A technical memorandum documenting the fourth quarter results will be submitted to DEGLE in the first quarter of 2022.

PFAS Investigation

Submitted a report documenting the results of the annual PFAS groundwater sampling event to DEGLE on August 18, 2021.

PFAS Corrective Measures Evaluation and Implementation

The storm water management improvements related to the middle and western pond berms were completed in August 2021; however, the establishment of an adequate vegetative cover is still ongoing.

Completed sampling of residential water supply wells on September 30, 2021. The late December 2021 sampling event was pushed into early January because of COVID issues with one of the three residences requiring sampling.

Rock rip-rap was placed in the bottom of the swale at the culvert outlets between August 26 and September 16, 2021, to further stabilize the swale and prevent erosion.

Four staff gages (SG-4 and SG-5 in the Middle Pond and SG-6 and SG-7 in the Western Pond) were installed and surveyed in September 2021.

Surface water samples were collected adjacent to each new staff gage location on September 30, 2021.

Collected sanitary sewer samples along Stanley Road subsequent to lining activities on December 9, 2021.

Conducted the third and fourth quarter storm water inspections on September 16, 2021 and December 21, 2021.

Conducted CCTV inspections of storm sewers and sanitary sewers scheduled for rehabilitation and sealing west of the Site in September 2021.

Site 11030 - Coldwater Road Landfill Cont'd

Designed sewer main liners and sealed manholes in October 2021.

Designed sewer lateral (connections between residences and sewer mains) liners, manufactured sewer main and lateral liners, completed the point repair along Temple Avenue, and installed the sewer main and 28 lateral liners in November and December 2021. Lateral liner installation is scheduled to be complete in early first quarter 2022, as weather allows.

Status

Continuing to evaluate options to address and mitigate PFAS impacts in Site storm and surface water and minimize any overflows and prevent possible discharges to the municipal storm sewer system. Options include pumping water from the ponds and treating before discharging to the storm sewer system. This evaluation will continue in the first quarter 2022, with implementation of the corrective measures anticipated in 2022.

Continuing to monitor for PFAS impacts in the sanitary and storm sewers, groundwater, and residential water supply wells. Continuing to monitor and evaluate the potential for unacceptable vapor intrusion to indoor air in a residential area west of the Site is expected to occur in 2022.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Continue Ongoing Landfill OMM

Submitted the Annual Post-Closure Groundwater Monitoring, Leak Detection System, and Landfill Inspection reports to DEGLE on February 14, 2022.

Performed semi-annual groundwater monitoring well, sump, and leak detection vault sampling during the week of June 6, 2022.

Vapor Investigation

A technical memorandum documenting the fourth quarter results were submitted to DEGLE on January 6, 2022.

Began preparation of an evaluation summary report

PFAS Investigation

The annual PFAS groundwater and Leak Detection System (LDS) sampling event was conducted the week of June 6, 2022.

PFAS Corrective Measures Evaluation and Implementation

At the request of the homeowner, a drinking water sample was collected from the private water supply well at 1073 E. Stanley Road on January 19, 2022, and was analyzed for PFAS. PFAS was not detected in the sample.

Completed sampling of private water supply wells on January 5, 2022. The late December 2021 sampling event was pushed into January because of COVID issues with one of the three residences requiring sampling.

Site 11030 - Coldwater Road Landfill Cont'd

Completed the first quarter sampling of private water supply wells on March 16, 2022.

Completed installation of storm water sewer liners, sanitary sewer main liners, and lateral liners during the week of February 14, 2022.

The first quarter 2022 storm water inspection was conducted on March 10, 2022.

Post lining samples were collected from three sanitary sewer manholes west of the Site, and an additional round of sanitary sewer samples were collected from four sanitary sewer manholes along Stanley Road on March 31, 2022.

A Temporary Pond Water Management Plan was submitted to DEGLE on March 9, 2022, via email, and a Storm Water Management Improvement Corrective Measures Options Analysis was submitted on March 22, 2022. The submittals addressed water flowing over the overflow structure of the Middle Pond, overtopping a portion of the berm for the Western Pond, and discharging to the municipal storm water system.

A treatability study for PFAS (in particular PFOS), in the pond water was started the week of March 7, 2022.

Through coordination with DEGLE, a temporary PFAS treatment system was setup and started on April 1, 2022, to treat pond water from the Western Pond prior to discharge to the municipal storm sewer system. Discontinuance of the system's operation and its removal from the Site is scheduled for July 7, 2022.

Areas of erosion to the Middle and Western Pond berms were repaired the week of May 16, 2022.

Collected additional storm water sewer samples along Coldwater Road south of the Site on April 14, 2022, May 16, 2022, and June 22, 2022, and analyzed the samples for PFAS.

Plugged the storm sewer pipe leading to "Outfall SS02" to stop a leak on May 31, 2022.

Conducted CCTV inspections of storm sewers along Stanley Road on May 27, 2022, and south of the Site along Coldwater Road on June 1, 2022.

On June 3, 2022, submitted a CAP and NPDES Permit Application in response to DEGLE's Water Resources Division Violation Notice No. VN-012757.

Status

Continuing to evaluate treatment options to mitigate PFAS impacts in Site storm and surface water and minimize any overflows and prevent possible discharges to the municipal storm sewer system. This evaluation will continue in the second half of 2022, with implementation of the corrective measures possible in 2023.

Will mobilize and operate a temporary PFAS treatment system in the event that water levels in the Western and Middle Ponds becomes too high and an off-Site discharge becomes possible.

Updated through June 30, 2022

Site 11030 - Coldwater Road Landfill Cont'd

Continuing to monitor for PFAS impacts in the sanitary and storm sewers, groundwater, and private water supply wells. Continuing to monitor and evaluate the potential for unacceptable vapor intrusion to indoor air in a residential area west of the Site is expected in the remainder of 2022.

MI – State – Site 11980 - Grand Rapids Stamping

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Additional Site-wide Investigation

A soil gas probe installation and sampling memorandum was submitted to DEGLE on August 3, 2021. A conference call with DEGLE to discuss the memorandum was held on October 25, 2021. Additional soil gas sampling was conducted on November 11, 2021. A memorandum summarizing the results will be submitted to DEGLE in January 2022.

On November 29, 2021, finalized an access agreement with ORM for soil investigation on adjacent railroad property. Field work was implemented on December 6 and 7, 2021, and the analytical results are pending. A memorandum summarizing the results is targeted for submittal to DEGLE in March 2022.

Status

No change in status

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Additional Site-wide Investigation

Soil gas probe sampling memoranda were submitted to DEGLE on January 6, 2022, February 9, 2022, and May 12, 2022 for soil gas sampling activities completed in November 2021, January 2022, and April 2022, respectively.

A conference call was held with DEGLE on March 21, 2022 to discuss the results of the December 2021 off-Site investigation on the adjacent railroad property. On April 1, 2022, RACER submitted to DEGLE a memorandum summarizing the results of the December 2021 soil sampling. Additional soil investigation was conducted on April 21, 2022.

Status

Site remediation activities are limited to evaluating the vapor intrusion pathway to indoor air off-site adjacent to a small area of the northern Site boundary and evaluation of soil impacts in a portion of the railroad property adjoining the northwest Site boundary. Further activity depends on the pending sampling results and discussions with DEGLE. Otherwise, no change in status.

MI – State – Site 11991 - Willow Run Plant

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

RI Investigation/Reporting, Work Plans, Soil and Groundwater Investigations

Evaluated groundwater elevation and quality data collected during 2021. Reporting will be completed in 2022.

Corrective Action Design

Continued with additional bench scale and pilot scale studies to evaluate PFAS treatment options for impacted groundwater including pretreatment for iron removal.

Groundwater Collection System

RACER continued to operate the groundwater collection and short-term treatment system continued through mid-October 2021, when RACER turned off the system to provide the Site owner the opportunity to test some of its infrastructure under high water table conditions. RACER continues to perform system sampling in accordance with discharge permit requirements and to allow for evaluation of treatment options. Work continues on the conceptual design for an interim groundwater treatment system with more robust iron removal prior to PFAS treatment. This interim groundwater treatment system or approach would target an operating period of two to five years to allow for PFAS science and treatment options to mature prior to committing to a long-term (30- to 50-year) treatment approach.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

RI Investigation/Reporting, Work Plans, Soil and Groundwater Investigations

Evaluated groundwater elevation and quality data collected during 2021. Submitted groundwater levels summary letter to EGLE in May 2022 which included a proposal to abandon a significant number of wells. Completed annual groundwater levels event in May 2022, and annual groundwater sampling event in June 2022. Groundwater sampling on the adjacent airport property was completed in May and June 2022. Evaluation and reporting will continue in 2022.

Corrective Action Design

RACER continued evaluating PFAS treatment options and technologies for impacted groundwater including pretreatment for iron removal.

Groundwater Collection System

RACER turned off the groundwater collection system in October 2021 to provide the Site owner the opportunity to test some of its infrastructure under high water table conditions. The system remained off through June 2022, with the exception of some minor pumping for maintenance activities. RACER continued system sampling in accordance with discharge permit requirements when pumping occurred. The system remains off as data is reviewed to evaluate if continued pumping is needed and to allow for new well installations under high water conditions (under

Updated through June 30, 2022

Site 11991 – Willow Run Cont'd

evaluation currently). RACER continues to work on the conceptual design for an interim groundwater treatment system with more robust iron removal prior to PFAS treatment. This interim groundwater treatment system or approach would target an operating period of two to five years to allow for PFAS science and treatment options to mature prior to committing to a long-term (30- to 50-year) treatment approach.

Status

No change in status.

MI – State – Site 12910 - Hemphill Road Industrial Land

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Groundwater Monitoring

None. The next groundwater sampling event is scheduled for April 2022.

PFAS Investigation

Completed a PFAS sampling event in November 2021 and a report documenting the results will be submitted to DEGLE during the first quarter of 2022.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Groundwater Monitoring

Completed the 2022 annual groundwater sampling event in April 2022 and began preparation of a report documenting the results.

PFAS Investigation

A report documenting the November 2021 PFAS sampling event results was submitted to DEGLE on January 21, 2022.

Completed a PFAS sampling event in April 2022 and began preparation of a report documenting the results.

Status

No change in status.

MI – State – Site 12970 - Windiate Park

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Post-Closure Care and Maintenance Program

On November 18, 2021, RACER completed a semi-annual soil cover inspection for the Windiate Park and Pengelly Road Lot 460 properties. The findings of the inspection will be summarized and submitted to DEGLE during the first quarter of 2022. No significant issues were identified during the inspection.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Post-Closure Care and Maintenance Program

On June 24, 2022, RACER completed a semi-annual soil cover inspection for the Windiate Park and Pengelly Road Lot 460 properties. The findings of the inspection will be summarized and submitted to DEGLE during the third quarter of 2022. No significant issues were identified during the inspection.

Status

No change in status.

MI – State – Site 13001 - Lansing Plant 2

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Work Plans, Investigation, and Reporting

Received approval of the Plant 2 Vault Closure Scope of Work form DEGLE in July 2021.

Submitted the Second Quarter 2021 Progress Report in July 2021.

Completed additional Plant 2 and Plant 3 Soils Corrective Measures delineation sampling in July 2021.

Submitted the Plant 3 Monitoring Well Repair & Additional MW Abandonment Work Plan in August 2021.

Submitted the 1,4-Dioxane Monitoring Well Installation and Test Well Abandonment Work Plan in August 2021.

Received approval of the Plant 6 PFAS Monitoring Well Installation Summary and Off-Site Investigation Work Plan from DEGLE in August 2021.

Met via virtual meeting with DEGLE to present an update on Site remedial progress in September 2021.

Submitted the Plants 2 and 6 Sewer Modifications Completion Update Report in September 2021.

Submitted the Third Quarter 2021 Progress Report in October 2021.

Received DEGLE's conditional approval of the 1,4-Dioxane Monitoring Well Installation and Test Well Abandonment Work Plan and in October 2021.

Received conditional approval of the Plant 3 Monitoring Well Repair & Additional MW Abandonment Work Plan in October 2021.

Submitted to DEGLE and received DEGLE's approval of the RACER Lansing Proposed Storm Sewer Work Plan for Plants 2, 3, and 6 in October 2021.

Submitted the 2021 Semi-Annual Groundwater Monitoring Report in October 2021.

Completed implementation of the Plant 2 Vault Closure Scope of Work in October 2021.

Completed implementation of the Plant 2 and Plant 3 1,4-Dioxane Monitoring Well Installation and Test Well Abandonment Work Plan in October and November 2021, including the following:

- Completed nine weathered bedrock vertical aquifer profiling borings ranging from 72 to 81 feet bgs.

Site 13001 – Lansing Plant 2 Cont'd

- Installed one shallow monitoring well to a depth of 12 feet bgs.
- Of the weathered bedrock borings completed, three were converted into permanent monitoring wells.
- Abandoned ten weathered bedrock pilot test wells.
- Collected groundwater samples from each of the weathered bedrock borings for analysis of 1,4-dioxane.

Completed implementation of the Plant 3 MW Abandonment Work Plan in November 2021 that included ten monitoring wells.

Met via virtual meeting with DEGLE to present an update on Site remedial progress in December 2021.

Submitted the Draft Plants 2 & 3 Soil Corrective Measures Summary Report in December 2021.

Submitted the Draft PCB Investigation Summary and Self-Implementing Work Plan in December 2021.

Completed Plant 6 Quarterly VI Monitoring activities in September and December 2021.

LNAPL Gauging

Completed semi-annual LNAPL gauging during December 2021.

Quarterly Groundwater Monitoring

Completed routine and non-routine groundwater monitoring and gauging during the Third and Fourth Quarters of 2021 per the DEGLE-approved October 2019 IGMP.

PFAS Corrective Measures

Completed implementation of the Plant 6 PFAS Off-Site Investigation Work Plan in September 2021, including the following:

- Completed 8 soil borings ranging in depth from 25-40 feet bgs.
- Collected groundwater samples from each boring for analysis of PFAS.

Completed monitoring of storm sewers between July and December 2021.

Replaced a catch basin within Osborn Road north of Plant 6 to prevent Site-related PFAS impacted groundwater from entering the catch basin and city storm sewer system.

Lower 1,4-Dioxane Corrective Measures

The full scale biosparge system at Plant 3 was fully operational from July 2021 through December 2021.

- Performed routine OMM.
- Collected performance monitoring data during the quarterly groundwater monitoring events as noted above.

The full scale biosparge system at Plant 2 was fully operational from July 2021 through December 2021.

- Performed routine OMM.

Site 13001 – Lansing Plant 2 Cont'd

- Collected performance monitoring data during the quarterly groundwater monitoring events as noted above.

Status

Activities completed during the reporting period have provided information to come closer to recommending Site-wide corrective measures to DEGLE or to proposing interim measures. An updated RFI Summary Report and updated CMS Report are expected to be submitted to DEGLE during the first quarter of 2022.

RACER continues to monitor the potential for off-Site soil vapor impacts and activities to address soil impacts that may require exposure barriers at Plants 2 and 3. RACER's PCB remediation work plan approved by DEGLE (then MDEQ) and USEPA in late 2015 has been re-evaluated as part of addressing soil impacts at Plant 2. A revised PCB work plan was submitted to EGLE in December 2021.

Groundwater, storm water, and LNAPL monitoring will continue on a routine schedule in accordance with the DEGLE-approved October 2019 revised IGMP.

Other Site activities are dependent upon groundwater and water supply well monitoring and other investigation results, coordination with other stakeholders, PFAS assessments, and DEGLE's review of investigation and interim corrective measure submittals and remedy selection process.

Otherwise, no change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Work Plans, Investigation, and Reporting

Submitted Draft RCRA Facility Investigation Summary Report in January 2022.

Submitted RCRA Corrective Measures Study in January 2022.

Submitted 2021 Well Abandonment Summary Memo for the abandonment of DEGLE approved biosparge pilot wells and shallow monitoring wells in January 2022.

Submitted the 2021 Plant 2 1,4-Dioxane Investigation Memo in January 2022.

Submitted the Plant 6 PFAS Off-Site Investigation Summary Memo in January 2022 and received DEGLE approval of proposed additional investigation in March 2022.

Submitted the Fourth Quarter Progress Report in January 2022.

Submitted the Storm Sewer Modifications November 2021 Catch Basin Replacement Memo in February 2022.

Completed development and additional sampling of MW-14-58R replacement well.

Site 13001 – Lansing Plant 2 Cont'd

Submitted and received DEGLE approval of the Plant 2 MW-14-58R Evaluation Work Plan in March 2022 and received DEGLE approval in March 2022.

Met via virtual meeting with DEGLE to present an update on Site remedial progress in April and June 2022.

Submitted First Quarter Progress Report in April 2022.

Submitted the 2021 Annual Plant 2 and Plant 3 Lower 1,4-Dioxane Biosparge Progress Report in April 2022.

Submitted the 2021 Annual Groundwater Monitoring Report in May 2022.

Received comments from DEGLE based on their review of the Plants 2 and 3 Soil Corrective Measures Summary Report and Revised PCB Work Plan in June 2022 and began evaluating and preparing responses to comments.

Submitted the Plant 2 Proposed Additional MW-14-58R investigation SOW.

Submitted the Plant 6 VI Investigation Summary Report.

LNAPL Gauging

Completed semi-annual LNAPL gauging.

Quarterly Groundwater Monitoring

Completed routine and non-routine groundwater monitoring and gauging during the First and Second Quarters of 2022 per the DEGLE-approved October 2019 IGMP.

Quarterly Storm Sewer Sampling

Completed routine and non-routine sampling of select storm sewer manhole locations.

PFAS Corrective Measures

Completed implementation of the Plant 6 PFAS Off-Site Investigation Work Plan, which included the following:

- Installed ten monitoring wells with 5-foot screens ranging in depths from 5.5 feet to 30 feet below ground surface depending on location and depth to water encountered.
- Each monitoring well was developed for future sampling.
- Sampled wells and analyzed for PFAS.

Lower 1,4-Dioxane Corrective Measures

Completed implementation of the Plant 2 MW-14-58R Evaluation Work Plan in March 2022, which included the following:

- Completed four vertical aquifer profile borings ranging in depth from 5 feet to 34 feet below ground surface depending on location and depth to water encountered.
- Collected a groundwater sample from MW-14-58R for analysis of 1,4-Dioxane.
- Converted one of the vertical aquifer profile locations into monitoring well MW-22-153 screened from 25 feet to 30 feet below ground surface.

Updated through June 30, 2022

Site 13001 – Lansing Plant 2 Cont'd

- Additional groundwater sampling was completed in April 2022 for MW-14-58R and MW-22-153 and samples were analyzed for 1,4-Dioxane and VOCs.

The full scale biosparge systems at Plants 2 and 3 were fully operational from January through June 2022.

- Performed routine OMM between January and June 2022.
- Collected performance monitoring data during the quarterly groundwater monitoring events as noted above.
- Conducted re-development of select biosparge wells for system maintenance/performance purposes in January and June 2022.

Status

An updated RFI Summary Report and updated CMS Report were submitted to DEGLE in January 2022 and are under review.

Groundwater, storm water, and LNAPL monitoring will continue on a routine schedule in accordance with the DEGLE-approved October 2019 revised IGMP.

Other Site activities are dependent upon groundwater and water supply well monitoring and other investigation results, coordination with other stakeholders, PFAS assessments, and DEGLE's review of investigation and interim corrective measure submittals and remedy selection process.

Otherwise, no change in status.

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

PAOC 19 – Site-Wide Groundwater

No activity this period.

Existing Building

No activity this period.

Investigation and Reporting

Submitted the report assessing the GSI pathway to Willow Run Creek (former Tyler Pond) and memoranda summarizing the investigation activities performed from 2016 through 2019 to DEGLE on August 11, 2021. A meeting with DEGLE to discuss the report was held on October 13, 2021.

Status

Further investigations and evaluations are dependent upon DEGLE’s review of the GSI pathway assessment and subsequent discussions, otherwise no change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

PAOC 19 – Site-Wide Groundwater

No activity this period.

Existing Building

No activity this period.

Investigation and Reporting

Provided presentation to DEGLE TAPS Team outlining the findings of the August 2021 report assessing the GSI pathway to Willow Run Creek (former Tyler Pond) on April 6, 2022.

Status

Further investigations and evaluations are dependent upon DEGLE’s review of the GSI pathway assessment and subsequent discussions, otherwise no change in status.

Updated through June 30, 2022

MISSOURI

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

On September 3, 2021, MoDNR provided comments on the Methane Mitigation Remediation Pilot Test Work Plan. On October 18, 2021, RACER sent a response to comments memorandum to MoDNR in support of an upcoming conference call with the agency. On October 22, 2021, RACER and MoDNR discussed by conference call the response to comments associated with the Work Plan. Based on the results of that call, the revised Work Plan was issued to MoDNR on November 9, 2021. MoDNR provided additional comments on the revised Work Plan on December 13, 2021. The second revision of the Work Plan was issued to MoDNR on December 15, 2021, which approved it on December 20, 2021.

On September 3, 2021, MoDNR provided comments on the Site Investigation Activities Report that RACER provided to MoDNR on December 17, 2020. On October 18, 2021, a response to comments memorandum was forwarded to the MoDNR in support of an upcoming conference call with the agency. On October 21, 2021, RACER and MoDNR discussed by conference call the response to comments associated with this Report. As an outcome of that call, MoDNR requested that a Comprehensive Remedial Investigation Report be prepared and submitted for review. Such Comprehensive Report would briefly summarize assessment activities prior to the involvement of RACER, and then provide a detailed summary of the assessment activities after the involvement of RACER. In addition, MoDNR indicated that a Risk Assessment must be included in the Comprehensive Report. On October 27, 2021, MoDNR provided a basic outline for the Comprehensive Report.

In addition, MoDNR has requested that additional soil vapor monitoring points be installed and sampled to determine the extent of methane impacts towards the east (in the direction of the railroad car maintenance facility).

Status

MoDNR has provide approval for the implementation of the Work Plan. The Work Plan will be implemented in the Spring of 2022. In addition, two soil vapor monitoring points will be installed and sampled in the direction of the railroad car maintenance facility at that time. The Comprehensive Report will be issued in January or early February 2022.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

On January 3, 2022, RACER provided to MoDNR the requested copies of the groundwater monitoring well construction detail table and the groundwater analytical results table. On March 9, 2022, the draft Comprehensive Investigation Report (text, tables, and figures in PDF) was provided to the MoDNR. On March 24, 2022, MoDNR, Haley & Aldrich, Inc., and RACER met by conference call regarding an overview of the Comprehensive Investigation Report, after which, the Comprehensive Investigation Report appendices (in PDF) were provided to MoDNR.

MoDNR requested that RACER take an inventory of the historical Site reports and determine which of them have been provided to MoDNR. MoDNR then requested copies of Site reports

Site 10070 - Leeds Cont'd

that had not previously been provided to MoDNR. The following Site reports were provided to MoDNR on the following dates.

On March 7, 2022:

- Environmental Site Assessment Study – August 1992 – Argonaut AEC
- Report on the Site Characterization of the Former Waste Disposal Area – January 1992 – Burns & McDonnell
- Well Abandonment Report – September 1997 – Burns & McDonnell Waste Consultants, Inc.
- Subsurface Investigation Report Buried Drum Discovery – July 1999 – Burns & McDonnell Waste Consultants, Inc.
- Remedial Action Report Recovery of Buried Drums – August 2000 – September 1997 – Burns & McDonnell Engineering Company, Inc.
- Historical Activities in the Waste Disposal Site Vicinity – October 2003 – Burns & McDonnell

On April 6, 2022:

- June 21, 2012, Site Investigation Data Report.

Status

Awaiting MoDNR comments on the Comprehensive Investigation Report. Will install and sample two soil vapor monitoring points in the direction of the railroad car maintenance facility as requested by the MoDNR.

NEW JERSEY

NJ – State – Site 10080 - Former Hyatt Clark Industries Property

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Routine OMM of the FPR system is ongoing. Work was conducted to secure off-Site property access for the remedial action of the off-Site PCB soil impacts.

Status

Work at the Site is proceeding as anticipated. OMM of the FPR system will continue. Remedial action of the off-Site PCB soil impacts is anticipated to be initiated in the second quarter 2022.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Routine OMM of the FPR system is ongoing. The 2022 Post-Construction Site Inspection Report was submitted to NJDEP and USEPA in June 2022. The Influent/Effluent Monitoring Report for the product recovery system was also submitted to NJDEP in June 2022. An updated right of entry agreement for the remedial action of the offsite PCB soil impacts on the Conrail property has been established. The access agreement for the adjacent commercial property is pending.

Status

With the exception of delays associated with off-Site property access, the work scope is proceeding as anticipated. OMM of the FPR system will continue. Remedial action of the off-Site PCB soil impacts is anticipated to be implemented in the fourth quarter 2022. A Site-wide groundwater monitoring event is also planned for the fourth quarter 2022.

NJ – State – Site 10090 - Ewing Township Industrial Land

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Soil

Submission of the revised Soil RAPs was completed by PTCUR's and Ewing Township's LSRP Rich Lake in November 2020 for the PTCUR and Ewing subdivided parcels (Lot 1.01 and 1.03); no soil activities were required or completed in 2021 by RACER.

Groundwater

Groundwater performance monitoring continued in Q3 and Q4 2021 focusing on the wells within the treatment area of AOC-1C. The monitoring of the performance of the groundwater remediation continues to demonstrate TCE concentrations have decreased as much as four orders of magnitude and daughter products (cis-1,2-DCE and VC) are being reduced to ethene. Initial sampling in Q3 and Q4 indicate favorable response and additional groundwater monitoring will be completed in 2022.

Additional carbon substrate is planned for 2022; should it become apparent that carbon levels are reduced in the aquifer and subsequent injection and recirculation are necessary, additional remedial events will be completed under the existing 5-year Permit By Rule which is valid through 2026.

Status

Soil remedial work is complete at the Site and the groundwater remedial efforts continue. The property has been sold and development is underway. Apartments are being currently leased and tenants have moved in.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Soil

Submission of the revised Soil RAPs was completed by PTCUR's LSRP (Rich Lake) in November 2020 for the PTCUR and Ewing subdivided parcels (Lots 1.01 and 1.03); no soil activities were required or completed in 2022 by RACER.

Groundwater

Groundwater pilot performance monitoring continued in Q1 and Q2 2022, with a full Site sampling event (Q1) and a focused performance monitoring event (Q2). The performance monitoring results had been suggesting excellent reductions in TCE; however, during Q2 2022 concentrations rebounded at one location.

Additional carbon substrate injection is planned for Q3 2022, consistent with the existing Five-year Permit which is valid through 2026. Groundwater monitoring in Q3 and Q4 2022 will assess the effectiveness of the addition of substrate.

Monitoring well damage by PTCUR and its contractor Vollers continues to be an issue at the Site. Several damaged/abandoned wells have been recently repaired or replaced by PTCUR and remaining repairs are in the process of being scheduled. In addition, the lack of a reliable

Updated through June 30, 2022

Site 10090 - Ewing Township Industrial Land Cont'd

survey of new/replacement wells has slowed the assessment process. These challenges drove RACER to obtain an RAR/RAO extension (3/24/2022) to the regulatory deadline for the Site. RACER is continuing to work with PTCUR to repair/replace wells that are damaged so that they can be utilized for sampling and water level elevations calculated

Status

Soil remedial work is complete at the Site and the groundwater remedial efforts continue. The property development continues and several apartment buildings are leased and tenants have moved in.

NEW YORK

RACER has completed its Environmental Action work at the following Site, where no further action is planned or anticipated. Therefore, this and future editions of the Environmental Action Status Reports does and will not include a separate section for this Site.

NY – State – Site 10980 – Tonawanda Landfill

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Mohawk Uplands Area

- In August 2021, submitted Draft Pre-Design Investigation Sampling Summary Report, in connection with the Mohawk Uplands Area, and received comments from USEPA/SRMT in December 2021.
- Submitted Topographic Survey and Draft Wetland Delineation Report in August 2021.
- Participated in conference calls related to scoping and field work implementation coordination with USEPA.

O&M Activities

- Ongoing operation of the groundwater recovery system; average recovery of 13,000 gpd.
- Ongoing monitoring and reporting of outfall discharges (003 and 004) in accordance with Permit Equivalent.
- Performed round of sampling on 38 monitoring wells and eight recovery wells.
- Performed quarterly sampling of several monitoring wells including and in the vicinity of MW-302S.
- Performed fish sampling event in the St. Lawrence River and Turtle Cove.
- Erected fish consumption advisory signage along St. Lawrence River.
- Mowed landfill final cover.

Status

Additional Mohawk Upland field activities are anticipated to be conducted in the Spring of 2022, following coordination of access and pre-design activity approvals. The 50% remedial design is in progress. Ongoing O&M activities will continue.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Mohawk Uplands Area

- Held stakeholder engagement session in January 2022.
- Submitted Revised Pre-Design Investigation Sampling Summary Report, in connection with the Mohawk Uplands Area, in January 2022 to address comments received from USEPA/SRMT in December 2021.
- Submitted 50% RD for Mohawk Uplands Area in April 2022.
- Completed field activities in April and May 2022.
- Participated in conference calls related to scoping and field work implementation coordination with USEPA.

O&M Activities

- Ongoing operation of the groundwater recovery system; average recovery of 12,500 gpd.
- Ongoing monitoring and reporting of outfall discharges (003 and 004) in accordance with Permit Equivalent.
- Performed quarterly sampling of several monitoring wells including and in the vicinity of MW-302S
- Mowed landfill final cover.
- Submitted sediment sampling plan for Turtle Cove for Agency review.

Status

Additional field activities were conducted in the Spring of 2022, following coordination of access and Pre-Design activity approvals. Submitted 50% Remedial Design. The 95% Remedial Design is in progress.

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Storm Water and Groundwater Treatment and Discharge

- Performance of routine operation and maintenance of storm water treatment system.
- Sampling and reporting for permitted outfalls 003 and 005.
- Routine operation and maintenance of thinner area groundwater collection system.

Vapor Intrusion Mitigation Program

- Routine O&M
- November 2021 sub-slab pressure readings at communication test point associated with routine O&M indicated a potentially adverse effect of a tenant's operation of cooling fans on SSDS.
- Indoor air sampling conducted on December 15, 2021.

On-Site and Off-Site RI/FS and Risk Assessment Program

- Submitted Revised Draft OU2 FFS Report in July 2021 and received comments from USEPA/NYSDEC in October 2021.
- Completed invasive species management for the National Grid Wetland in July and September 2021.
- Submitted Revised Draft OU1 FS Report and OU1 GW Summary Report in August 2021.
- Submitted Treatability Study Summary Report for the preliminary bench scale study in August 2021 and received comments from USEPA/NYSDEC in October 2021.
- Collected additional OU2 PDI samples and samples for the next phase of treatability study in August 2021.
- Submitted Work Plan for the Treatability Study in November 2021 and received comments from USEPA/NYSDEC in December 2021.
- Submitted the National Grid Wetland Remediation Year 4 Annual Monitoring Report in December 2021.
- Continued bi-weekly conference calls with NYSDEC and USEPA to discuss OU1 and OU2 activities, including the OU1 FS and OU2 FFS Report revisions and the OU2 Treatability Study.

Hydraulic Control Pre-design and Design: No activities took place during this reporting period. NYSDEC is reviewing the PDI pumping test technical memorandum submitted in June 2013.

Redevelopment

- Continued coordination with new property owner and Agencies for Tenant Use Notices and redevelopment activities.
- Landfill liner repair activities associated with National Grid's installation of a new power pole in the former landfill area were substantially completed in March 2021 with some restoration activities remaining to be performed. Ramboll reviewed National Grid's construction completion report and provided comments to the NYSDEC. Ramboll anticipates reviewing a final version of the report in 2022.

Status

Site 10100 – Former IFG Facility Cont'd

Remedies for OU-1 have not yet been selected by NYSDEC, therefore, uncertainty remains relative to the costs to complete OU-1 remediation. The selected OU-2 remedy is presented in the March 2015 ROD and the October 2015 Order on Consent and Administrative Settlement. Additional soil sampling conducted as part of OU-2 RA PDI activities implemented in 2018, 2019, 2020, and 2021 indicate that the off-Site remedy will significantly exceed the available funding for off-Site (i.e., non-IFG facility) remediation. Agency engagement continues for advancement of the OU1 FS and the OU-2 FFS. RACER and USEPA entered into an Administrative Settlement Agreement and Order on Consent for OU2 on September 30, 2021. Draft 2022 budgets for OU1 and OU2 were submitted to NYSDEC and USEPA in November 2021 and approved in December 2021.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Storm Water and Groundwater Treatment and Discharge

- Performance of routine OMM of storm water treatment system.
- Sampling and reporting for permitted outfalls 003 and 005. SPDES Permit Renewal application with submitted in February 2022.
- In March 2022, the annual SPDES inspection was performed with a representative from NYSDEC.
- Routine OMM of thinner area groundwater collection system.
- The annual Consent Order groundwater sampling was conducted in May 2022. Results were provided to NYSDEC in June 2022.

Vapor Intrusion Mitigation Program

- Routine O&M
- Submitted December 2021 indoor air sampling results in January 2022 (preliminary) and February 2022 (final). A call with NYSDEC, USEPA, and NYSDOH to discuss the data was held in February 2022.
- Additional communication testing events were conducted in Spring of 2022 to further evaluate the effects of a tenant's cooling fan operations on the SSDS as identified from the November 2021 pressure readings. Temporary operating restrictions for cooling fans based on pressure readings were communicated to tenant. This tenant subsequently vacated the facility in June 2021.

On-Site and Off-Site RI/FS and Risk Assessment Program

- Submitted Revised Draft OU2 FFS Report in January 2022 based on the October 2021 comments from USEPA/NYSDEC. Additional comments from USEPA/NYSDEC were received in March 2022.
- Received comments on the August 2021 Revised Draft OU1 FS Report and OU1 GW Summary Report from NYSDEC/USEPA in February 2022. Resubmitted the Revised Draft OU1 FS and OU1 GW Summary Report in June 2022.
- In February 2022, submitted responses to the USEPA/NYSDEC comments received in December 2021 on the November 2021 Work Plan for the Treatability Study. USEPA submitted additional comments in April 2022 and a response to these comments was provided in May 2022.
- The treatability study was conducted between March and April 2022. Summary report preparation is ongoing.

Site 10100 – Former IFG Facility Cont'd

- Continued bi-weekly conference calls with NYSDEC and USEPA to discuss OU1 and OU2 activities, including the OU1 FS and OU2 FFS Report revisions and the OU2 Treatability Study. Additional calls were held with NYSDEC and USEPA to discuss the OU1 FS in February, May, and June 2022 and the OU2 FFS in March and May 2022.

Hydraulic Control Pre-design and Design

- No activities took place during this reporting period. NYSDEC is currently reviewing the PDI pumping test technical memorandum submitted in June 2013.

Redevelopment

- Continued coordination with new property owner and Agencies for Tenant Use Notices and redevelopment activities.
- Landfill liner repair activities associated with National Grid's installation of a new power pole in the former landfill area were substantially completed in March 2021 with the remaining restoration activities completed in May 2022. Ramboll reviewed National Grid's construction completion report and provided comments to the NYSDEC. Ramboll anticipates reviewing a final version of the report in 2022.
- In March 2022, RACER was informed of a new switch pole that National Grid installed in the soil consolidation area. Coordination with National Grid is ongoing.

Status

Remedies for OU1 have not yet been selected by NYSDEC, therefore, uncertainty remains relative to the costs to complete OU1 remediation. The selected OU2 remedy is presented in the March 2015 ROD and the October 2015 Order on Consent and Administrative Settlement. Additional soil sampling conducted as part of OU2 RA PDI activities implemented in 2018 through 2021 indicate that the off-Site remedy will significantly exceed the available funding for off-Site (*i.e.*, non-IFG facility) remediation. Agency engagement continues for advancement of the OU1 FS and the OU2 FFS.

NY – State – Site 11100 - Ley Creek PCB Dredgings

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

OMM Activities for Cap

- Performed routine OMM for soil cover (mowing, maintenance, and inspection).
- Submitted 2020 Annual OM&M Report in October 2021.
- USEPA completed its Site visit for the Five-Year Review in July 2021 and shared a draft of the 4th Five Year Review Report with RACER in December 2021.

Other Activities: Maintenance activities were performed on monitoring wells including redeveloping MW-8 and MW-12 and replacing a bolt on OBG-25D.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

OMM Activities for Cap

- Performed routine OMM for soil cover (mowing, maintenance, and inspection).
- Submitted the Periodic Review Report (including the 2021 Annual OM&M Report) in April 2022.
- RACER provided comments on the Five-Year Review to USEPA in January 2022.
- RACER received feedback from the Onondaga Nation (shared via USEPA) in February 2022 related to concerns over potential damage to the geotextile liner from burrowing animals and exposed geotextile material observed along the creek bank. Subsequent discussions were held in March 2022 and the preparation of an addendum to the OMM Plan (to address burrowing animal concerns) and a bank evaluation work plan are ongoing.

Other Activities

- In May/June 2022, National Grid was observed to have accessed the Site to complete repairs to a pole located on the north side of Ley Creek (located within the Former IFG Facility OU2/Expanded Territory area). The pole was accessed from the Site via a temporary bridge constructed by National Grid. Coordination with National Grid to resolve its apparent need to access the Site and repair any damage caused to the Site by such access is ongoing.

Status

Inspection of the Ley Creek bank indicates erosion has occurred and bank restoration activities may be required. The banks will be further evaluated in 2022. Associated repairs may result in an increase over the original Cleanup cost for this Site.

Updated through June 30, 2022

OHIO

RACER has completed Environmental Action work at the following Site, where no further action planned or anticipated. Therefore, this and future editions of the Environmental Action Status Reports does and will not include a separate section for this Site.

OH – State – Site 12010 – Mansfield Stamping Plant

OH – EPA – Site 10990 - Toledo 103C Landfill

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Performed OMM of Cap and Leachate Collection System, semi-monthly OMM of the FDA, FSP, and leachate collection system. Submitted summary results memorandum of the sampling results of the additional temporary monitoring points installed based comments from USEPA on the draft CMP. Received initial comments from USEPA on summary results memorandum.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Performed OMM of Cap and Leachate Collection System, and semi-monthly OMM of the FDA, FSP, and leachate collection system. Revised CA725 based on comments from USEPA. Completed the Annual Report for 2021 activities.

Status

No change in status.

OH – EPA – Site 13170 - Moraine Facilities

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Field activities included OMM of the two closed RCRA units, monthly DN-13 effluent sampling in accordance with NPDES permit, and collection of groundwater samples for Site-wide groundwater monitoring program. Continued with shutdown of the IRZ carbon source introductions zones. Implemented maintenance and monitoring activities associated with the operation of the USEPA-approved Interim Measure Phase I DGR for remediation of the Riverview Neighborhood. USEPA issued draft Statement of Basis for public comment. Activities were also completed in the downgradient neighborhood related to the vapor intrusion mitigation program, including conducting system inspections and collecting indoor air samples.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Performed OMM of the two closed RCRA units, monthly DN-13 effluent sampling in accordance with NPDES permit, and collection of Site-wide groundwater monitoring program. Continued to monitor the shutdown IRZ zones through groundwater conditions via additional groundwater sampling. Continued operation of Phase 1 DGR for the Riverview Neighborhood. Activities were also completed in the downgradient neighborhood related to the vapor intrusion mitigation program. Submitted the 2021 Site-Wide Annual Groundwater Monitoring Report.

Status

No change in status. Comment period ended for the draft Statement of Basis.

OH – State – Site 11110 - Elyria Closed Landfill

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Performed Landfill Post Closure Operations including leachate removal, groundwater monitoring, and bi-weekly inspections of the landfill in accordance with Post Closure Plan. Submitted Landfill Evaluation Memorandum for the closed RCRA Landfill. Received and discussed OEPA comments to the CMS. Also, provided additional information related to closed settling basins.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Performed Landfill Post Closure Operations including leachate removal, groundwater monitoring, and bi-weekly inspections of landfill in accordance with Post-Closure Plan. Submitted 2021 Biennial Hazardous Waste Report to OEPA. Completed a site-wide inventory of the groundwater monitoring wells. Submitted the draft Corrective Measures Study to OEPA for review. Submitted the draft PCB Excavation Work Plan/Bid Specifications to OEPA for review and approval as an interim measure. Collected additional PCB delineation soil samples as part of the interim measures to remove PCB-impacted soil.

Status

No change in status.

OH – State – Site 12030 - Parma Powertrain Assembly Plant

JULY 1, 2021 thru DECEMBER 31, 2021

Activities Completed

Completed annual certification reporting which included the Risk Management Plan and O&M reports. Worked with current Site owner, ICP, to support the sale of the property to a third party.

Status

No change in status.

JANUARY 1, 2022 thru JUNE 30, 2022

Activities Completed

Performed field activities associated with the operation and monitoring of the SSDS. Conducted Site visit to ensure SSDS was operating properly.

Status

No change in status.