

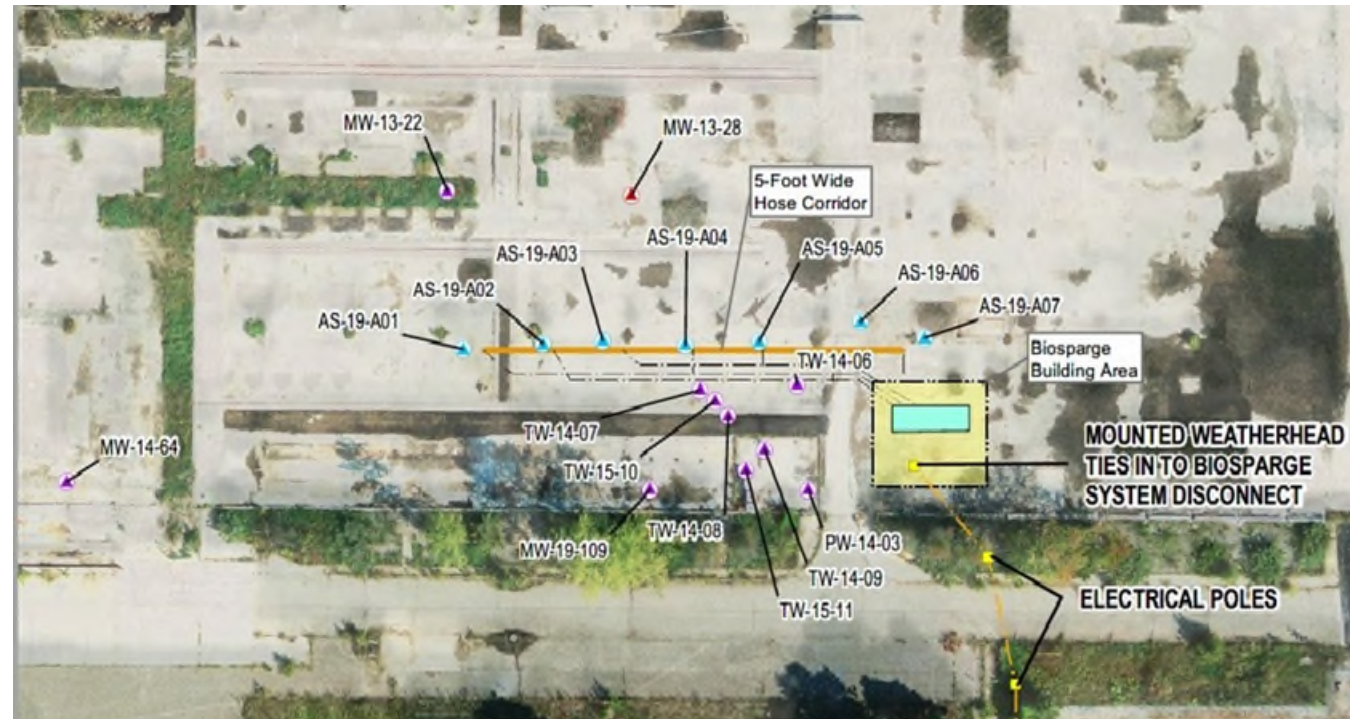
RACER TRUST LANSING PLANTS 2, 3, & 6

3Q 2019 Quarterly Progress Report | October 15, 2019



Biosparge System – Plant 3

- The Plant 3 biosparge system began sparging air on July 16, began propane sparging on July 24 and nutrient injections to all biosparge wells was completed on August 22.
- Performance monitoring of the Plant 3 system was completed on select monitoring wells during the 3Q routine groundwater sampling event completed August 28, 2019 (approximately one month after operation) – 5 wells sampled for biosparge nutrients. Data collected will be presented in the routine Annual or Semi-Annual Groundwater Reports



Biosparge System – Plant 2

- A majority of the Plant 2 biosparge wells were installed during 3Q 2019 – continuous installation from July through September 2019.
- Completion of approx. 90% of the mechanical design for Plant 2 biosparge system.
- Performance monitoring data collected will be presented in the routine Annual or Semi-Annual Groundwater Reports



Storm Sewer Corrective Measures Actions to Address PFAS Impacts- 3Q 2019

- Plant 2 and 3 Storm Sewer Modifications Work Plan submitted to EGLE in July.
- Work plan for next steps at Plant 6 currently being developed.

Quarterly Groundwater Monitoring – 3Q 2019

- Utilized the revised Interim Groundwater Monitoring Program (IGMP), approved by EGLE, during this event.
- Completed between August 26-30, 2019
- Plant 2 – No wells sampled or gauged during the 3Q event per the revised IGMP.
- Plant 3 – 19 wells gauged; 9 wells sampled for 1,4-dioxane; 10 wells sampled for PFAS.
- Plant 6 – 6 wells gauged and sampled for PFAS.
- Data collected during the 3Q 2019 sampling event will be provided in the next annual IGMP Summary report likely completed during 2Q or 3Q 2020.

Work Plans, Reports and Data Submitted, and Meetings

- July 14, 2019 – Submittal of Plant 3 PFAS Investigation Addendum to EGLE.
- July 25, 2019 – Update meeting/presentation with EGLE.
- August 14, 2019 – Approval received from EGLE for revised IGMP which was implemented during the 3Q 2019 sampling event.
- August 15, 2019 – submittal of Plant 2 Light Non-Aqueous Phase Liquid (LNAPL) Natural Source Zone Depletion (NSZD) Summary Report to EGLE.
- September 3, 2019 – Submittal of Plant 6 PFAS Investigation Summary Report – Phase 2 to EGLE.
- September 24, 2019 – Update meeting/presentation with EGLE.

Work in Progress and Near-Term Milestones Anticipated During the 4th Quarter 2019

Activity	Schedule
Biosparge	
Plant 2 Drilling - sand lens installation; collection of vertical aquifer profile samples and installation of wells along transects and for performance monitoring of system	Through November 2019
Plant 2 Design - completion of mechanical request for proposal and civil design in progress	4Q 2019
Plant 3 Operations - continued operation and performance monitoring	Ongoing
Storm Sewer Corrective Actions	
Completion and Submittal of Plant 6 Storm Sewer Work Plan to EGLE to Address PFAS impacts	Dec-19
Implementation of Plant 2 and 3 storm sewer modifications pending EGLE approval of work plan, and weather.	Nov-19
Investigations and Sampling	
4Q 2019 Routine Groundwater Monitoring Event	Begins week of 12/2/19
Bedrock Well Installation	Oct-19
Abandonment and Re-Installation of One Deep Monitoring Well at Plant 3	Oct-19
Work Plans, Reports and Data Submitted, and Meetings	
Submit Revised Vapor Intrusion Work Plan	10/3/19
2019 Semi-Annual Groundwater Monitoring Report	Oct-19
Revised IGMP	Nov-19
Plant 2 Southeast PFAS Investigation Summary Memo	Dec-19
Plant 3 Well Install and PFAS Sampling Summary Memo	Dec-19
Update Meeting with EGLE	Dec-19
Plant 6 PFAS Storm Sewer Investigation/Corrective Measures Work Plan	Dec-19