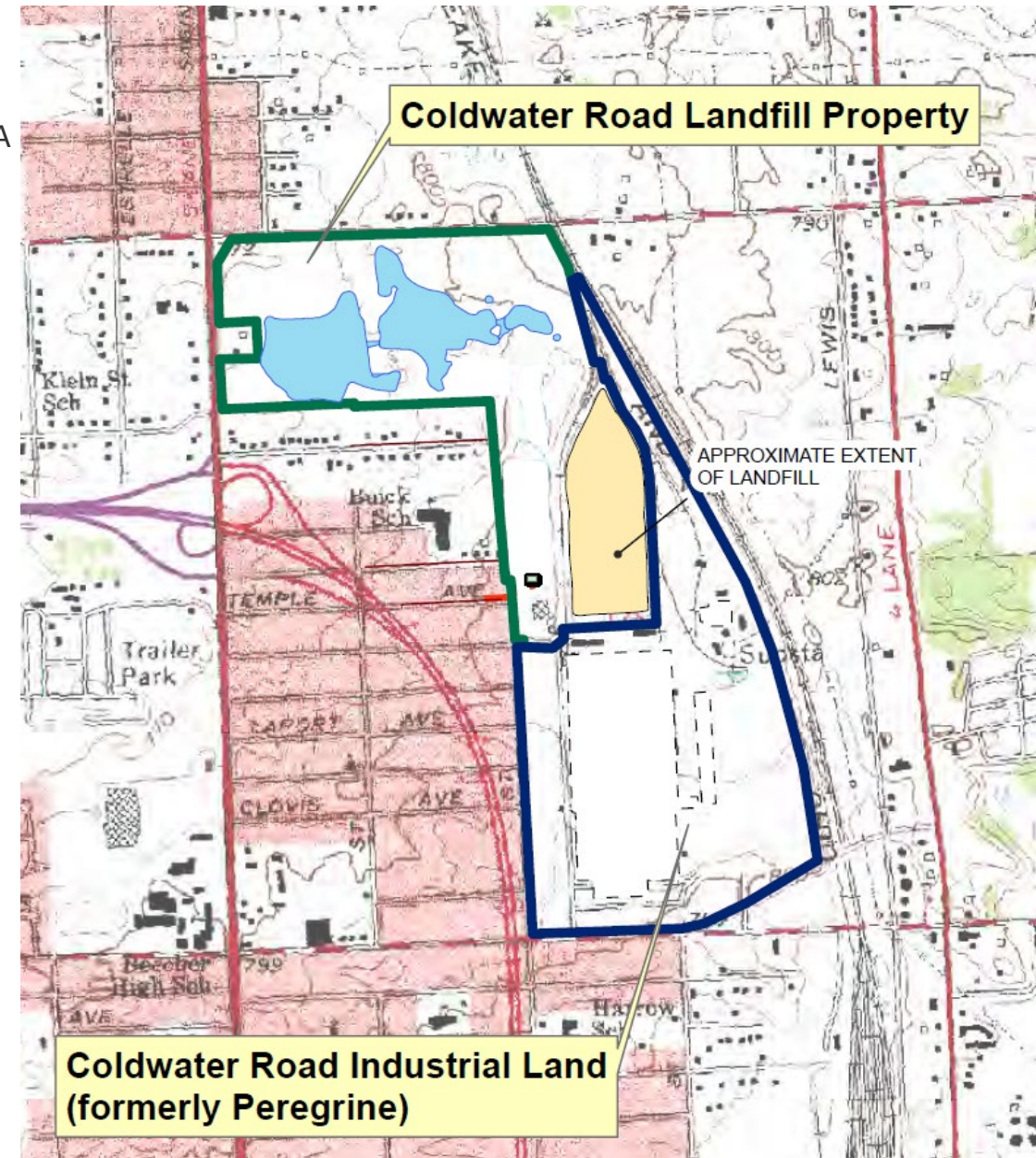


DRAFT

RACER TRUST  
COLDWATER ROAD SITE  
PFAS ACTIVITY PROGRESS  
REPORT – December 3, 2024

# INTRODUCTION

- ❑ Remediation at the RACER Coldwater Road Site is being performed through the RCRA Corrective Action program under the oversight of EGLE. Current activities include RCRA hazardous waste landfill operation and maintenance (O&M), assessment of potential off-site vapor intrusion, and per- and polyfluoroalkyl substances (PFAS) focused site characterization, interim actions, monitoring, and evaluations. A no further action determination was received from EGLE on April 9, 2024, for the vapor intrusion to indoor air pathway. In addition, activities are being completed to address EGLE's WRD Violation Notice dated May 4, 2022 that is related to PFAS.
- ❑ Characterization of PFAS in groundwater in glacial deposits to depths of approximately 100 feet below the ground surface is generally completed. Groundwater within the drift aquifer, which may be utilized for drinking water, generally meets drinking water standards. PFAS has been found primarily in shallow (<45 feet below ground surface) groundwater at the Site, except adjacent to the north-eastern portion of the Site where deeper impacts have been observed. PFAS in groundwater extends beyond a portion of the western and northern Site property boundaries.
- ❑ Interim actions for PFAS have included replacement of one residential well and continued treatment of two residential wells, continued operation of the pre-treatment system for landfill discharges to the sanitary sewer, and efforts toward eliminating PFAS discharge offsite through storm and sanitary sewers. Discharges from the Western Pond to the storm sewer are now treated to remove PFOS in accordance with an NPDES Permit.
- ❑ Routine groundwater monitoring at the Site in the shallow (perched) zone and the drift aquifer is ongoing and is anticipated to continue. Monitoring of select residential wells, storm sewers, and sanitary sewers is anticipated at least for the next few years.



# PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

## GROUNDWATER

- Samples were collected from private wells at 1278 E. Stanley Road and 1320 E. Stanley Road on October 17, 2024. In the results from both residences, no PFAS were detected in the post-treatment samples. The letters to the residents are still being prepared and will be delivered in the next few weeks. Given the treatment units have consistently removed PFOS to below drinking water levels and PFAS results in the untreated well water have remained stable at 1278 E. Stanley Road and 1320 E. Stanley Rd. since sampling began in 2018, we have requested approval to change the sample frequency from quarterly to occur on a semiannual basis.
- PFOS continues to be the primary PFAS detected in the Raw (untreated) water at both locations. The Raw water results during the October event at 1278 E. Stanley Rd. was above its Michigan drinking water criteria and within the range of previously detected concentrations.
- The Raw water PFOS concentration at 1320 E. Stanley Rd. during the June event was not above its Michigan drinking water criteria and was within the range of previously detected concentrations. The results have been shared with EGLE and the residents. It's our understanding that the newly enacted federal MCL for PFOS of 4 ng/l has not yet been adopted by EGLE and we should continue to apply the current PFAS rules and criteria at the Site until further notice.
- The 2024 annual PFAS groundwater and leak detection system report was submitted to EGLE on September 11, 2024.

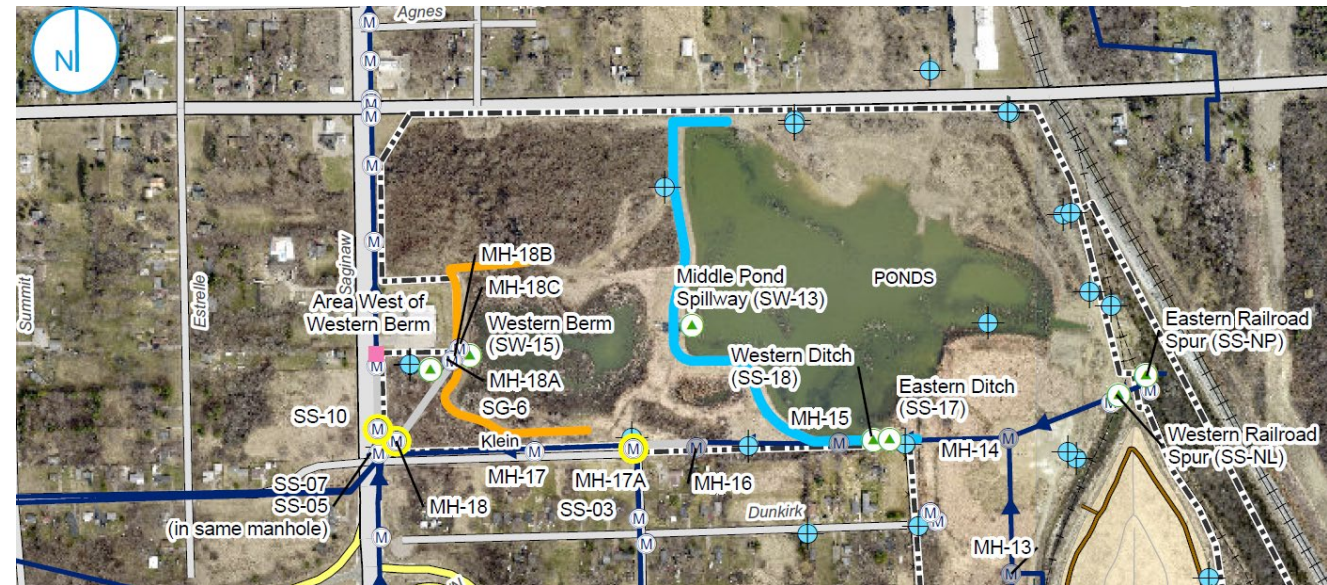


# PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

## STORM WATER – Pond Management

- ❑ A temporary PFAS treatment system was remobilized on September 18, 2024 and operated until November 23, 2024 to remove PFOS prior to discharge to the municipal storm sewer system. Water from the Middle Pond is conveyed to the Western Pond by use of a siphon to lower the water level in the Middle Pond. The discharge and related reporting was completed in accordance with the NPDES Permit.
- ❑ Collected pond samples (SW-13 and SW-15) from the Middle and Western Ponds on September 19, 2024. The results of the pond samples increased compared to previous results yet were within range of historical results.
- ❑ Continued evaluation of a stationary treatment system concept, including bench-scale laboratory studies.

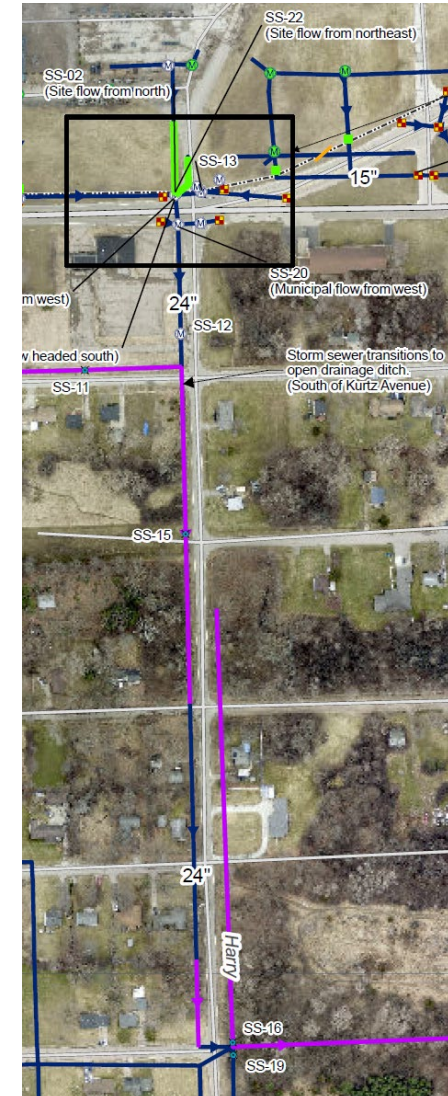
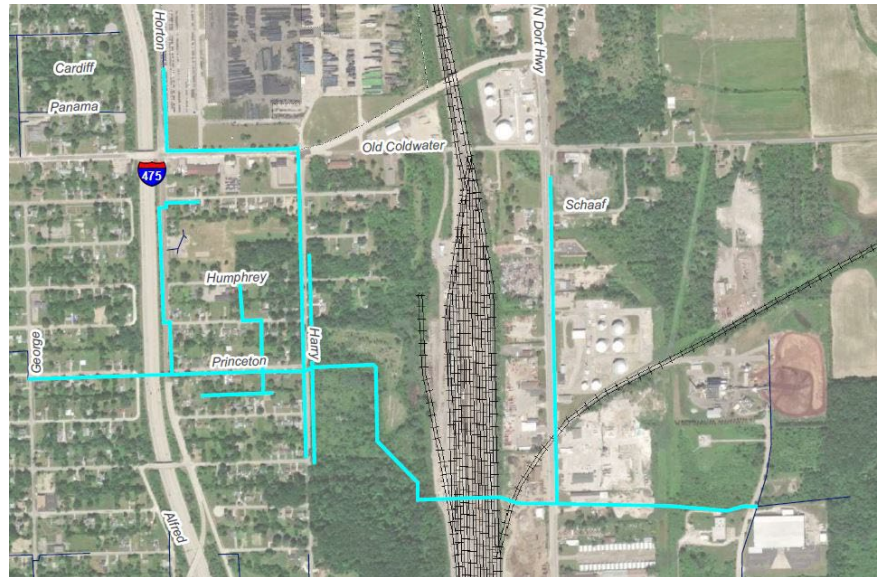
- ⊕ MONITORING WELL / PIEZOMETER
- M STORM SEWER MANHOLE
- Ⓜ MANHOLE ABANDONED AND PLUGGED
- Ⓜ STORM SEWER SAMPLE LOCATION TO BE SAMPLED
- ▲ SURFACE WATER SAMPLE LOCATION
- CATCH BASIN
- STORM SEWER PIPE PLUG
- STORM SEWER
- SEALED STORM SEWER
- - - PROPERTY BOUNDARY
- ▭ FORMER BUILDING
- COMPLETED BERM
- MIDDLE POND BERM - ELEV. 792.5



# PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

## STORM WATER - Sewers

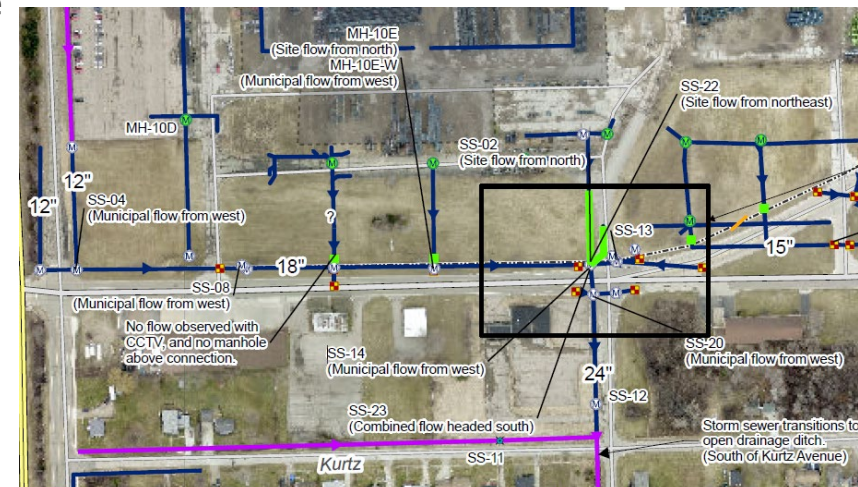
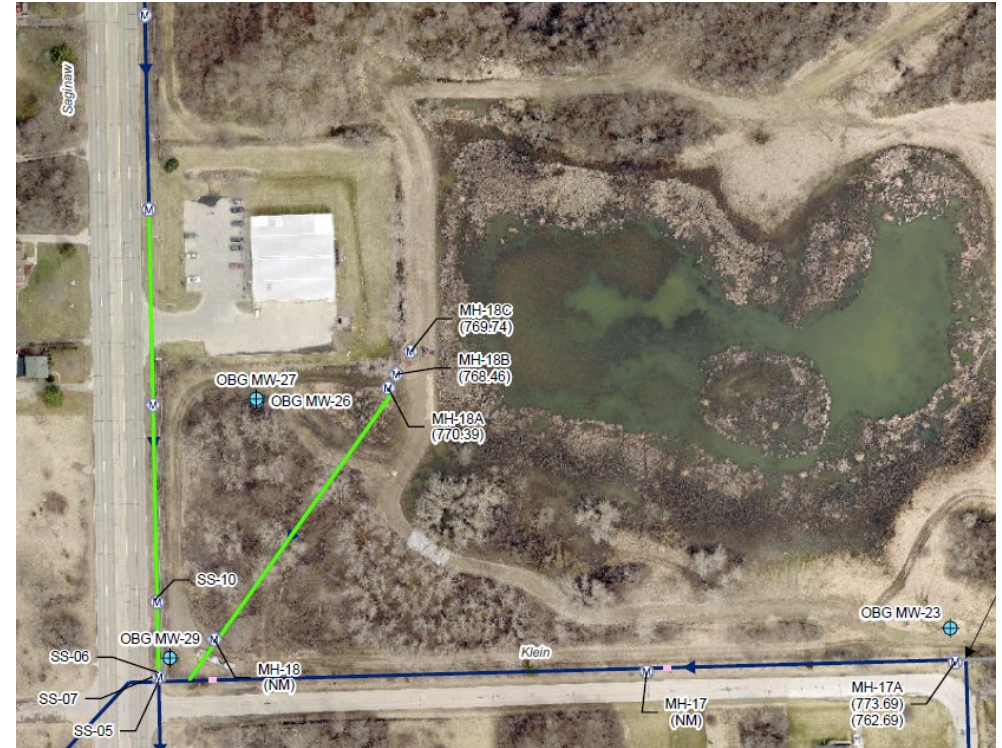
- Continued observation and evaluation of storm sewers south of the Site. Collected storm water samples from off-Site sewer lines on June 17, 2024 and a memo summarizing the results was submitted on August 22, 2024.
- Collected storm water samples from off-Site sewer lines on October 14, 2024 and a memo summarizing the results is being prepared.



# PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

## STORM WATER - Inspection

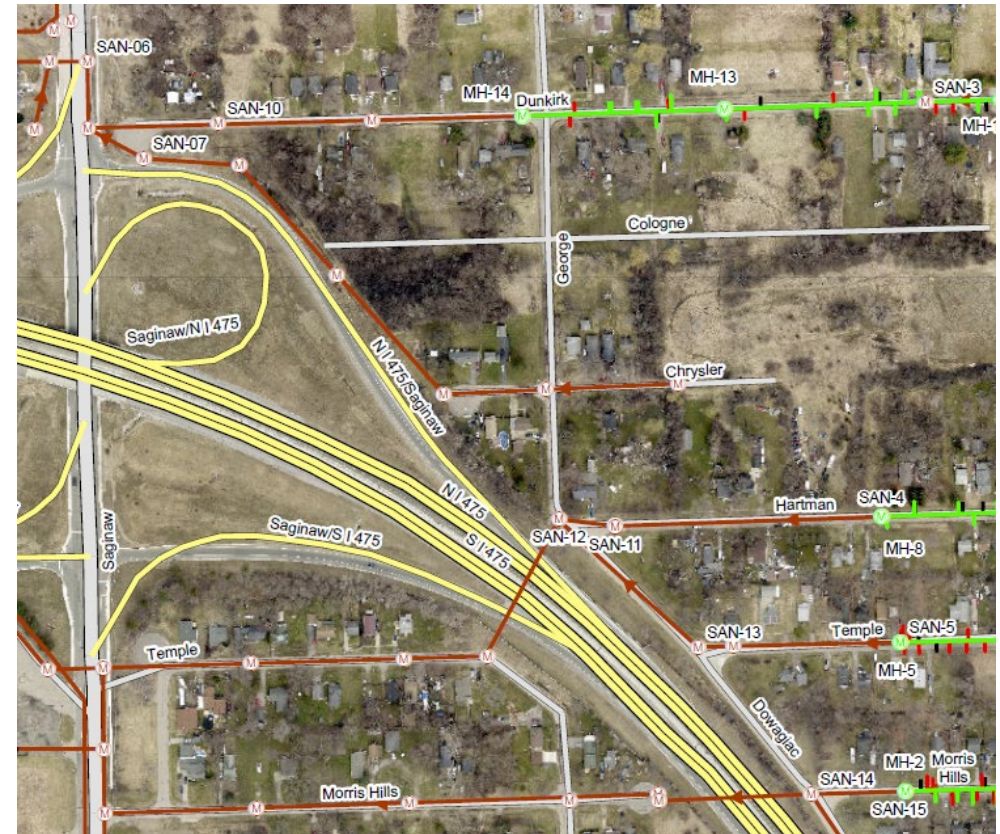
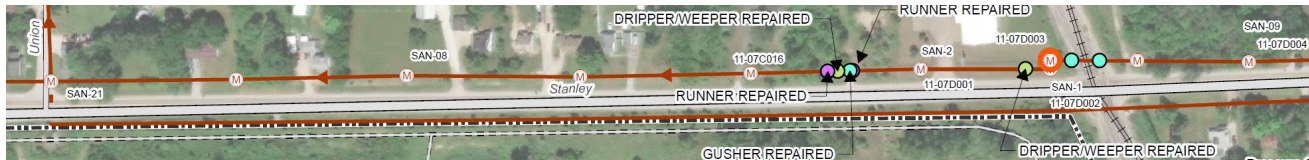
- ❑ The third quarter 2024 storm water inspection was conducted on October 14, 2024, observations include:
  - No uncontrolled discharge from the ponds to off-site or overtopping of berms was observed.
  - Water was flowing from the west railroad spur, and no water was flowing from the railroad spur east of the landfill. The railroad spurs convey stormwater to the culvert/swale, which empties into the Middle Pond.
  - No water was flowing from the western most drainage ditch west of the landfill/remaining materials area, which empty into the Middle Pond.
  - No flow has been observed from the Site in manhole MH-17A since the section of storm sewer between manholes MH-16 (which is east of MH-17A) and MH-17A were sealed in June 2021.
  - Water was flowing from MH-18A into MH-18, which empties into the 72-inch storm water sewer along Klein Street as the temporary system was operating.
  - No dripping was observed from the plug at MH-10E since the storm water pipe leading to the outfall was plugged.
  - No dripping was observed from the plugs at SS-02 since the storm water pipe from the Site was plugged.
  - The storm water inspection summary matrix will be included along with the October sampling results memo.



# PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

## ❑ SANITARY SEWERS

- ❑ Collected samples from the sanitary sewer manholes along Stanley Road (11-07C016, SAN-2, SAN-08, SAN-09, & SAN-21) on June 27, 2024. The results were summarized and submitted in a memo on August 30, 2024.
- ❑ Collected samples from the sanitary sewer manholes west of the Site (SAN-06, SAN-12, & SAN-14) on June 27, 2024. The results were summarized and submitted in a memo on August 30, 2024.



# WORK IN PROGRESS AND NEAR-TERM MILESTONES ANTICIPATED IN THE NEXT SEVERAL MONTHS

Activity	Schedule
PFAS Monitoring:	
<ul style="list-style-type: none"> <li>➤ Submit private well sample results</li> <li>➤ Prepare and submit summary of storm water inspection and sampling results south of Site</li> <li>➤ Collect additional round of samples from the Stanley Road sanitary sewer</li> <li>➤ Collect additional round of samples from West of the Site sanitary sewers</li> <li>➤ Collect additional round of samples from South of Site storm sewers</li> <li>➤ Inspect storm water features and sample (SS-17A &amp; SS-02), if flow is observed</li> <li>➤ Record surface water levels (Western &amp; Middle Ponds)</li> <li>➤ Sample residential wells (1278 &amp; 1320 E. Stanley Road)</li> </ul>	<p>December</p> <p>December</p> <p>December</p> <p>December</p> <p>December</p> <p>December</p> <p>Recorded Daily</p> <p>To be Determined. Requested change to Semiannual</p>
PFAS Corrective Measures:	
<ul style="list-style-type: none"> <li>➤ Operate temporary treatment system for discharge from Western/Middle Ponds</li> <li>➤ Continue evaluation of a stationary treatment system concept</li> </ul>	<p>To be Determined. Tentatively scheduled to start May 2025</p> <p>To be Determined.</p>