

Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard, LU-9J
Chicago, Illinois 60604-3590

Arcadis of Michigan, LLC
28550 Cabot Drive
Suite 500
Novi
Michigan 48377
Phone: 248 994 2240
www.arcadis.com

Date: July 15, 2025
Our Ref: 30267726

Subject: Semi-Annual Progress Report, January 2025 – June 2025
Performance Based Administrative Order on Consent
Docket No. RCRA-5-2011- 0019; RACER Trust Pontiac North Campus
Site 11970 - MID 005 356 886, MID 085 470 102 & MID 005 356 910
Pontiac, Michigan

Dear Ms. Stanhope,

This progress report has been prepared in accordance with Section VI (24b) of the Administrative Order of Consent (AOC; Docket Number RCRA-05-2011-0019) entered into by the Revitalizing Auto Communities Environmental Response Trust (RACER Trust) and the United States Environmental Protection Agency (USEPA) for the above referenced Site. The following summarizes the work performed, data collected, estimated percent complete, project schedule, and problems encountered for the period January 1, 2025, through June 30, 2025, for the portions of the Pontiac North Campus (PNC or Site) for which RACER Trust is responsible for remediation. Please note that based on agreement with USEPA, the Joslyn properties are not included under RCRA Corrective Action and are being addressed separately with USEPA and the Michigan Department of Environment, Great Lakes, and Energy (EGLE). Summary of progress addressing the Joslyn properties is, however, provided in this report.

Work Performed from January 1, 2025, through June 30, 2025:

(Includes references to reports which provide relevant details and data collected)

- Submitted the Final 2024 LNAPL Assessment Update to USEPA on January 3rd, 2025.
- Completed storm sewer sampling activities from a manhole within the eastern right of way of Saginaw Street to evaluate PFAS concentrations on January 13th, 2025. The activities were conducted pursuant to the December 19th, 2024 Storm Sewer Sampling Work Plan, approved by USEPA on December 23, 2024.
- Submitted July–December 2024 Semi-Annual Progress Report to USEPA on January 17th, 2025. USEPA provided comment on February 25th, 2025, via email transmittal letter. A revised Semi-Annual Progress Report was submitted to USEPA on June 2nd, 2025.
- Submitted Additional Scope of Work for RCRA Investigation to USEPA on January 30th, 2025 to complete additional soil investigation in select areas of the Site. USEPA approved the Scope on February 25, 2025, via email transmittal letter.
- The two additional soil vapor monitoring points (SVMPs) installed in the right of way, further south of MWOS-10, were sampled on March 21st and June 23rd, 2025. This completes four quarters of consecutive sampling

Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
July 15, 2025

for these two new points. Dependent upon the results and approval from USEPA, additional sampling will be at a semi-annual frequency as are all other SVMPs related to the Fiero property.

- Submittal of 2025 Fiero Temporary Groundwater Monitoring Plan (TGMP) to USEPA via email transmittal on March 5th, 2025. USEPA approved of the 2025 TGMP via email transmittal on March 10th, 2025.
- Conducted the first 2025 semi-annual groundwater and soil vapor monitoring at the Former Fiero Properties on March 17th through March 21st, 2025, per USEPA approved 2025 TGMP.
- Submitted Draft 2024 Fiero Temporary Groundwater Monitoring Plan (TGMP) Summary Report on April 10th, 2025. USEPA provided comments via email transmittal on May 22nd, 2025 and a response to comments was provided via email to USEPA on June 10th, 2025. The Final 2024 Fiero TGMP Summary Report is anticipated to be submitted to USEPA in August 2025.
- Submitted the Draft PFAS Storm Sewer Sampling Results Memo to USEPA on April 11th, 2025. The USEPA provided comments on May 19, 2025, via email transmittal. RACER submitted a response to comments, via email transmittal, on June 18th, 2025. The Final PFAS Storm Sewer Sampling Results Memo was submitted to USEPA on June 20th, 2025.
- Based on updated groundwater sampling activities conducted in November 2024, the Draft Fiero Parking Lot Data Summary Memo was updated with this data and submitted to USEPA on April 4th, 2025. USEPA provided comments on May 13th, 2025, via email transmittal. The Final Fiero Parking Lot Data Summary Memo is anticipated to be submitted to USEPA in August 2025.
- Planned and completed additional soil sampling at the Site on May 19th and 20th, 2025. The work was conducted as outlined in the Additional Scope of Work for RCRA Investigation, submitted to USEPA via email and approved by USEPA on February 25th, 2025, via email transmittal letter.
- Submitted the Final SVMP Installation and Summary Memo to USEPA on June 2nd, 2025, after revising based on USEPA comments provided in a February 25th, 2025 approval letter transmitted via email.
- Submitted the Draft 2024 Annual Groundwater Monitoring Report on June 25th, 2025.
- Presented Montcalm Street Seep Background, Remedy Options Evaluation, Optimization, and Recommendations slides to USEPA, including ORD, on April 1st, 2025.
- Submitted Montcalm Street Seep Control Discharge Hose Reconfiguration request to USEPA, via email transmittal, on May 7th, 2025. USEPA approved of this request, via email transmittal, on May 13th, 2025.
- Completed hose reconfiguration activities late May through June 2025. Several movements were conducted to place hose in an optimal location. An update on these activities was provided to USEPA via email on June 26, 2025.
- Conducted routine O&M associated with the Montcalm Street Seep Control System from January through June 2025; seepage of groundwater from the Site onto Montcalm Street continues to be prevented during this timeframe.
- Conducted routine project update calls with USEPA in January, February, and May 2025.
- Continued support and coordination with existing property owners to complete necessary corrective action activities.

Data Collected

Data collected relevant to the Work Performed described above is included in the applicable report submittals.

Estimated Percent Complete

Project Management

Ongoing

Corrective Action – General

- Current Conditions Report submitted to USEPA (11/25/11) 100%
- 2012 Budget Authorization approved by USEPA (12/9/11) 100%
- Environmental Indicators Report submitted to USEPA (12/29/11) 100%
- 2012 Budget Amendment 1 approved (2/10/12) 100%
- Draft RFI Report submitted to USEPA (7/9/12) 100%
- 2012 Budget Amendment 2 approved by USEPA (9/19/12) 100%
- 2012 Budget Amendment 3 approved by USEPA (9/19/12) 100%
- 2013 Budget Authorization approved by USEPA (1/25/13) 100%
- Draft CMP Report submitted to USEPA (3/15/13) 100%
- 2013 Budget Amendment 1 approved by USEPA (7/18/13) 100%
- 2013 Budget Amendment 2 approved by USEPA (11/12/13) 100%
- 2014 Budget Authorization approved by USEPA (11/20/13) 100%
- 2014 Budget Amendment 1 approved by USEPA (5/23/14) 100%
- 2015 Budget Authorization approved by USEPA (11/20/14) 100%
- Fiero Focused CMS approved by USEPA (7/1/15) 100%
- Draft Fiero CMI Work Plan (10/7/15) 100%
- 2016 Budget Authorization approved by USEPA (11/20/15) 100%
- 2016 Budget Amendment 1 approved by USEPA (9/9/16) 100%
- 2017 Budget Authorization approved by USEPA (11/22/16) 100%
- 2018 Budget Authorization approved by USEPA (12/12/17) 100%
- Draft Fiero CA 725 and CA 750 submitted to USEPA (12/22/16) 100%
- Draft Duck Pond CACC submitted to USEPA (1/6/17) 100%
- (Pursue this request only if needed for a potential sale of the property)
- Fiero CA 725 and 750 approved by USEPA (8/11/17) 100%
- Revised Draft PNC CMS submittal to USEPA NA
 (CA Summary Report to be submitted instead of CMS, see below)
- 2018 Budget Amendment 1 approved by USEPA (7/18/18) 100%
- 2019 Budget Authorization approved by USEPA (11/23/18) 100%
- 2020 Budget Authorization approved by USEPA (12/20/19) 100%
- 2020 Budget Modification 1 approved by USEPA (2/3/20) 100%
- 2021 Budget Authorization approved by USEPA (12/11/20) 100%
- 2022 Budget Authorization approved by USEPA (11/22/21) 100%
- 2023 Budget Authorization approved by USEPA (12/15/22) 100%
- 2024 Budget Authorization approved by USEPA (1/9/24) 100%
- 2025 Budget Authorization approved by USEPA (11/26/24) 100%
- Draft Corrective Action (CA) Summary Report and Draft LNAPL Appendices Submitted to USEPA (Drafts 3/8/21 and 6/19/21, respectively) 100%
- Responses to USEPA Comments on Draft CA Summary Report (10/21/21) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (3/02/22) 100%

Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 July 15, 2025

- Responses to additional USEPA Comments on Draft CA Summary Report (5/03/22) 100%
- Revised Draft CA Summary Report, including Data Re-Screening (2/10/23) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (7/25/23) 100%
- Revised CA Summary Report, based on USEPA comments received 4/12/23 (7/25/23) 100%
- Supplemental RCRA Facility Investigation Scope of Work (Draft 9/26/23). Response to USEPA comments (11/01/23) 100%
- Supplemental RCRA Facility Investigation Scope of Work (11/28/23) 100%
- Supplemental RCRA Facility Investigation Summary and Recommendations Memo (Draft 3/8/24). Comments from USEPA (6/11/24); response to comments (9/4/24); USEPA approval (9/9/24); Final submitted (10/01/24) 100%
- SVMPs installed in right of way south of MWOS-10, per USEPA request (7/1/24) 100%
 Sampling was conducted on the points in July, September and November 2024. Additional sampling to complete four consecutive quarters was completed (March and June 2025)
- Fiero Parking Lot Summary Memo (Draft 7/16/24); Meeting with EGLE RAT (11/20/24); Revised Fiero Parking Lot Memo (4/4/25); USEPA comments provided (5/13/25) 90%
- Final SVMP Installation and Summary Memo submitted to USEPA (6/02/25) 100%

Corrective Measures – Institutional Controls

- Declaration of Restrictive Covenants (DRCs) recorded for all Site parcels 60%
- Recorded USEPA and MDEQ (now EGLE) approved DRC for the Duck Pond property (Nov 2016/ Montcalm Street) 100%
- Recorded DRC for the former Plant 14 South property (Nov 2017) 100%
- Recorded DRC for the USPS property (April 2018) 100%
- Draft First Amended DRC for Duck Pond Property to USEPA and EGLE (draft submitted 8/26/19; on hold) 90%
- Obtained USEPA and EGLE approval of First Amended DRC for the Proastio Parcel (former Plant 14 South) and Railroad Parcels (4/17/20) and Recorded (5/12/20) 100%
- Obtained approval from USPS and recorded First Amended and Restated DRC for the USPS property (12/17/21) 100%

Corrective Measures – Soil

- AOI M-27 arsenic-impacted soil delineation completed (Mar 2013) 100%
- AOI M-27 arsenic-impacted soil removal (Dec 2013) 100%
- Draft Interim Measures Work Plan - TSCA Soil Cap (former Plant 14 south property) submitted to USEPA (5/13/15) 100%
- 2017 PCB Soil Delineation Summary Memo submitted to USEPA (2/27/17) 100%
- 2018 PCB Soil Delineation Summary Memo submitted to USEPA (5/08/18) 100%
- 2018 Additional PCB Soil Delineation Summary Memo submitted to USEPA (7/25/18) 100%
- PCB-impacted Soil Interim Measures Removal Work Plan approved by USEPA (7/10/19) 100%
- PCB-impacted Soil AOI W-1 IMWP Field Implementation (Nov 2019 – Jun 2020) 100%
- PCB-impacted Soil AOI W-1 IMWP Completion Report submitted to USEPA (3/31/21) 100%

Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 July 15, 2025

- Supplemental RCRA Facility Investigation field work completed (11/06/23-11/09/23) 100%
- Supplemental RCRA Facility Investigation Scope of Work field work completed(11/06/24) 100%
- Additional Scope of Work for RCRA Investigation submitted to USEPA (1/30/25) 100%
- Additional Supplemental RCRA Facility Investigation Scope of Work completed (5/19/25) 100%

Corrective Measures – Groundwater/LNAPL

- LNAPL investigation on USPS property (Sept-Nov 2012) 100%
- Quarterly monitoring of USPS transmissivity/sentry wells (Feb-Dec 2013) 100%
- LNAPL investigation at AOIs M-2 and W-8 (Aug-Nov 2013) 100%
- PCB delineation at AOIs M-2, LNAPL Areas 1/7, 2A, 2B (June-Dec 2014) 100%
- 2013/2014 LNAPL Investigation Tech Memo submitted to USEPA (1/30/15) 100%
- Draft PCB Investigation Summary Memo submitted to USEPA (2/6/15) 100%
- Additional PCB LNAPL Delineation Activities (Apr-June 2015) 100%
- Draft 2014-2015 PCB Investigation Summary Memo submitted to USPEA (8/17/15) 100%
- Supplemental Site (USPS Property) Characterization Summary Report submitted to USEPA (7/21/16) 100%
- Supplemental Soil Gas Data Evaluation Memo (USPS Property) submitted to USEPA (9/1/16) 100%
- Supplemental 1,4-Dioxane Investigation Summary Report submitted to USEPA (12/7/17) 100%
- LNAPL Interim Measures Feasibility Confirmation and Pre-Design Specification Testing memorandum submitted to USEPA (4/27/18) 100%
- Supplemental 1,4-Dioxane/VOC Groundwater Investigation Summary Report submitted to USEPA (6/13/18) 100%
- Additional LNAPL Pre-Design / Transmissivity Testing and Interim Measures Removal Work Plan submitted to USEPA (8/27/18) 100%
- Supplement to June 13, 2018 1,4-D/VOC Memo Report; Evaluation of Groundwater Data Compared to USEPA Screening Levels (1/9/19) 100%
- LNAPL Interim Measures Removal Implementation at RW-08-14 (May 2019) 100%
- Duck Pond Summary for GSI Pathway Determination submitted to USEPA (6/18/19) 100%
- 2019-2020 Duck Pond GW Investigation Memo submitted to USEPA (4/7/20) 100%
- LNAPL Recovery System (RW-08-14) Completion Memo Report (4/28/20) 100%
- Fiero Property VI USEPA/EGLE-Approved SOW Field Implementation (9/2/20) 100%
- 2020 Additional Tn Testing Memorandum Report submitted to USEPA (3/4/21) 100%
- Fiero Property Well Installation & Groundwater Monitoring Report submitted to USEPA (5/14/21) 100%
- Fiero Property Conceptual Site Model (CSM) Report (9/8/21) 100%
- Fiero Property Source Investigation Scope of Work (9/7/21) 100%
- DRAFT 2021 RW-08-14 Tn Testing / Shutdown Request Memorandum submitted to USEPA (12/21/21) 100%
- Response to USEPA Comments on 2021 RW-08-14 Tn Testing / Shutdown Request Memorandum (4/25/22) 100%
- Fiero Site Investigation Summary Report (Draft 4/27/22), Comments provided by USEPA (6/6/22), Response to comments submitted (7/15/22), Additional comments provided 100%

Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
July 15, 2025

- by USEPA (8/8/22), Response to comments submitted (9/9/22), Final submitted (2/23/23),
No further comments from USEPA in email dated (7/7/23)
- 2022 RACER Pontiac North Campus Water Well Survey (Draft 6/24/22); revised version 100%
To address USEPA comments submitted to USEPA (10/20/23)
 - Fiero Property SOW Implementation and CSM Refinement completed (July/August 2022) 100%
 - In Situ Chemical Reduction with ZVI Pilot Study Work Plan (Draft 7/7/22), USEPA and 100%
EGLE approval (11/18/22), Final incorporating comments provided by USEPA
and EGLE (1/4/23)
 - Zero Valent Iron Pilot Test Work Plan Presentation to USEPA and EGLE (10/7/22) 100%
 - Final RW-08-14 Shutdown Request Memorandum (7/21/22; USEPA approval (7/25/22) 100%
 - Additional Fiero investigation work and ZVI performance well installation (October 2022) 100%
 - RW-08-14 LNAPL System Decommission Memo (Draft 10/26/22), Final (4/12/23) 100%
 - Former Fiero Property Supplemental Site Investigation Scope of Work 100%
Submitted (7/21/22) Final submitted (12/21/22)
 - In Situ Chemical Reduction with Zero Valent Iron Pilot Study Installation Summary 100%
(Final 3/20/23)
 - RACER PNC LNAPL Assessment – MWM32-04 and TW-MD-06 memo (1/19/24); USEPA 100%
comments provided; Response to comments submitted (4/4/24); USEPA approval (4/25/24)
 - PNC LNAPL Assessment Update for MWM32-04 and TW-MD-06 submitted (Draft 11/12/24); 100%
Final 1/03/25)

Groundwater Monitoring and Other O&M

- 2011 Annual Groundwater Report submitted to USEPA (1/5/12) 100%
- 2012 Annual Groundwater Report submitted to USEPA (2/9/13) 100%
- 2013 Annual Groundwater Report submitted to USEPA (4/16/14) 100%
- 2014 Annual Groundwater Report submitted to USEPA (12/18/14) 100%
- 2015 Annual Groundwater Report submitted to USEPA (12/23/15) 100%
- 2016 Annual Groundwater Report submitted to USEPA (12/29/16) 100%
- 2017 Annual Groundwater Report submitted to USEPA (2/30/18) 100%
- Well Abandonment Request submitted to USEPA (3/7/18) 100%
- Groundwater Monitoring Program Modification Request submitted to USEPA (8/27/18) 100%
- 2018 Annual Groundwater Report submitted to USEPA (1/29/19) 100%
- 2019 Annual Groundwater Report submitted to USEPA (2/18/20) 100%
- Fiero Properties Well Locating Memo Report (12/18/20) 100%
- Fiero Properties Well Abandonment Memo Report (12/18/20) 100%
- 2020 Annual Groundwater Report submitted to USEPA (3/4/21) 100%
- 2021 Annual Groundwater Report submitted to USEPA (2/10/22) 100%
- Fiero Temporary Monitoring Plan (2/23/22) 100%
- Proposed Fiero Well Abandonment Memo (4/08/22) 100%
- RACER Pontiac North Campus 2021 Property Inspection Report (4/15/22) 100%
- 2022 Fiero Temporary Groundwater Monitoring Plan Summary (4/21/23) 100%
- Fiero First Quarter 2022 Results Data Memo (5/20/22) 100%

Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 July 15, 2025

- Fiero Second Quarter 2022 Results Data Memo (9/7/22) 100%
- Fiero Third Quarter 2022 Results Data Memo (12/14/22) 100%
- 2022 Annual Groundwater Report (8/10/23) 100%
- 2022 Property Inspection Report (8/31/23) 100%
- 2023 Revised Fiero Temporary Monitoring Plan (Draft 2/16/23), Comments provided by USEPA (2/27/23), Response to comments submitted (3/9/23), USEPA approval (3/16/23), and Final submitted (4/4/23) 100%
- 2023 Fiero Temporary Monitoring Plan 1Q Results Memo (6/13/23) 100%
- 2023 Fiero Temporary Monitoring Plan 2Q Results Memo (10/3/23) 100%
- 2023 Fiero Temporary Monitoring Plan 3Q Results Memo (1/18/24) 100%
- 2023 Fiero Temporary Groundwater Monitoring Plan Summary (Draft 3/22/24), Comments provided by USEPA (4/24/24), Final submitted (7/3/24) 100%
- 2023 Annual Groundwater Report submitted to USEPA (Draft 5/10/24); USEPA comments provided (7/15/24); Response to Comments submitted (9/11/24); Final submitted (11/5/24) 100%
- 2025 Fiero Temporary Groundwater Monitoring Plan (TGMP) submitted (3/5/25); USEPA approved (3/10/25) 100%
- 2024 Fiero TGMP Summary Report submitted (Draft 4/10/25); USEPA comments provided (5/22/25); Response to comments submitted (6/10/25) 90%
- 2024 Annual Groundwater Report (Draft 6/25/25) 80%
- Updated Groundwater Monitoring Plan (GMP) submitted (Draft 8/29/24) Revised GMP submitted (10/04/24); conditional approval provided by USEPA (10/30/24); revised GMP to incorporate USEPA comments in progress 80%
- Monitoring Well Abandonment Proposal (Draft 8/29/24) 50%
- Montcalm Seep Control System Operation, Maintenance & Monitoring Ongoing

Storm Sewers

- Montcalm toe drain swale construction (Feb 2012) 100%
- Sewer bulkheading activities completed (Apr 2012) 100%
- Swale/sidewalk construction (Sept 2012) 100%
- Montcalm discharge investigation completed (July-Sep 2013) 100%
- Discharge Request submitted to City of Pontiac (Oct 2013) 100%
- Montcalm Avenue Sidewalk Amendment (1-foot aggregate cover) installed on the sidewalk (May 2015) 100%
- Montcalm Discharge Feasibility Study/Data Collection (Jan - June 2015) 100%
- Montcalm Seep Assessment Memo submitted to USEPA (2/9/15) 100%
- Montcalm Seep IM Work Plan submitted to USEPA/MDEQ (11/10/17) 100%
- Montcalm Injection Test Summary Memo Report submitted to USEPA/MDEQ (1/31/18) 100%
- Montcalm Seep Interim Measures Revised Work Plan submitted to USEPA/MDEQ (4/13/18) – MDEQ Approval (6/8/2018), USEPA Approval (6/25/18) 100%

Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 July 15, 2025

- Montcalm Seep Interim Measures Implementation (June 2019) 100%
- Fiero Summary of Former VOC Detections Memo Report submitted to USEPA (3/3/20) 100%
- Montcalm Seep Control System Completion Memo Report submitted to USEPA (7/15/20) 100%
- Montcalm IM Monitoring Report submitted to USEPA (09/10/20) 100%
- Montcalm Seep NPDES Permit Discharge Application submitted to EGLE (3/31/21), Permit application to be withdrawn due to detection of PFOS in sump samples 75%
- Meeting with USEPA to discuss Montcalm Seep Evaluation and USEPA Comments (July and August 2024) 100%
- Montcalm Street Seep Background, Remedy Options Evaluation, Optimization, and Recommendations slides presented to USEPA (4/1/25) 100%
- Montcalm Street Seep Discharge Hose Reconfiguration Request submitted (5/7/25); USEPA approved 5/13/25) 100%
- Discharge hose reconfiguration activities (May-June 2025) 100%

Former RCRA Hazardous Waste Management Units (WMUs). Includes Fiero property WMU AOI F-3 (southern Fiero former hazardous waste drum storage pad), Fiero property AOI F-6 (northern Fiero former Plant 17 tank farm), and USPS property WMU AOI W-2 (west yard former hazardous waste storage)

- Soil/groundwater delineation completed during RFI activities (2001-2011) 100%
- Receipt of MDEQ letter "Referred to Corrective Action for Closure; Revitalizing Auto Communities Environmental Response (RACER) Trust, Former Fiero Assembly Plant, Pontiac, Michigan; MID 005 356 910" March 3, 2013. 100%
- Proposed corrective measures for WMUs (site-wide deed restrictions) incorporated into Fiero Focused CMS (USEPA approved on 7/1/15) and CA Summary Report (being revised). 100%
 - Anticipated deed restrictions will prohibit the use of groundwater, limit the use of the property to non-residential, and require soil and soil vapor management in accordance with Michigan regulations.
- MDEQ Waste Management Division inspection of 2 former waste management units (WMUs) on the Fiero property (4/15/15). No violations or comments. 100%
- MDEQ Waste Management Division inspection of 2 former waste management units (WMUs) on the Fiero property (10/25/17). No violations or comments. 100%
- EGLE Waste Management Division focused Corrective Action Inspection of the RACER PNC Site (7/27/20) and Acceptance of Responses (8/26/20) 100%
- Addressed in CA Summary Report included in Corrective Action – General section above

Initial Groundwater Screening for PFAS

- Initial PFAS Sampling Plan (Draft 2/3/23), Comments provided by USEPA (3/3/23), Response to Comments submitted (4/7/23), Final submitted (4/18/23) 100%
- Initial PFAS Sampling Results and Supplemental PFAS Sampling Plan (12/8/23) 100%
- PFAS Groundwater Sampling Summary (6/27/24) 100%
- PFAS Storm Sewer Sampling Work Plan submitted (12/19/24); USEPA approved (12/23/24) 100%
- Storm sewer sampling activities for PFAS completed (1/13/25) 100%

Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
July 15, 2025

- PFAS Storm Sewer Sampling Results Memo submitted (6/20/25) 100%

Joslyn Avenue Parcels (Not subject to RCRA CA)

- Joslyn Ave Parcel Historical Summary Memorandum & RCRA Determination submitted (1/19/21). USEPA approved with conditions (3/3/21). 100%
- Joslyn North Parcel Investigation Report submitted to USEPA (8/03/21) USEPA approved No Further Action with a condition requiring a DRC (9/29/2021) 100%
- Joslyn South Parcel Investigation Report submitted to USEPA & EGLE (8/24/21) 100%
- Joslyn North Parcel Well Abandonment Summary Memo submitted to USEPA (12/20/21) 100%
- DRC for Joslyn North Property submitted to USEPA and EGLE (1/7/2022) Approved by USEPA 4/13/2023; DRC recorded with Oakland County 5/3/23 100%
- Joslyn South Parcel Delineation Investigation (Field Work Completed 11/19/21-12/10/21) 100%
- Joslyn South Parcel Investigation Report (7/15/22) 100%
- Joslyn South Parcel on-site soil borings (12/19/22) 100%
- 2022 Joslyn South Parcel Groundwater and Soil Investigation Summary Report (5/12/23) 100%
- 2023 Joslyn Temporary Monitoring Plan First and Second Quarter Results (10/11/23) 100%
- 2023 Joslyn Groundwater Sampling Summary (8/13/24) 100%
- 2024 Joslyn Groundwater Sampling Summary (12/28/24) 100%

Project Schedule – Work Targeted for Completion During Next Reporting Period

An updated task-based Gant chart for the 2025 Project Schedule is attached. Items anticipated to be completed during the next reporting period:

- Update 2024 Revised Groundwater Monitoring Plan per USEPA comments and re-submit to USEPA for review and final approval
- Submit email scope of work and complete additional phase of Supplemental RCRA Facility Investigation and discuss results with USEPA once data is received
- Complete additional PFAS Storm Sewer Sampling per PFAS Summary Report recommendations
- Complete Fiero groundwater and soil vapor sampling in third quarter 2025
- Continue evaluation of Fiero groundwater and soil vapor data and discussions with USEPA
- Complete Joslyn Annual Sampling for 2025 in third quarter
- Submittal of 2024 Annual Inspection Report
- Submittal of Final 2024 Fiero Groundwater Monitoring Summary Report
- Submittal of Final 2024 Annual Groundwater Monitoring Report
- Submittal of Final Fiero Parking Lot Summary Memo
- Following USEPA approval of the Revised CA Summary Report, an Operation, Maintenance, and Monitoring (OMM) Plan will be prepared for the Site. This document will be submitted to USEPA for review and approval.
- Continue Montcalm Seep Control System OMM and observe conditions following discharge hose reconfiguration
- Respond to any comments received from USEPA or EGLE on submittals or other matters
- Provide support to USEPA and initiate updates to other RCRA decision process documents as determined appropriate
- Support development and finalization of deed restrictions for the Site as determined appropriate

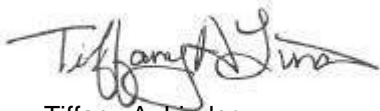
Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
July 15, 2025

Problems Encountered

No problems were encountered during the reporting period.

Should you have any questions on the information provided within this progress report, please feel free to contact Brendan Mullen with RACER Trust at bmullen@racertrust.org 201-247-4890 or me at the below referenced contact information.

Sincerely,
Arcadis of Michigan, LLC



Tiffany A. Linder
Certified Project Manager

Email: tiffany.linder@arcadis.com
Direct Line: 810 225 1928

CC. Elizabeth Garver, EGLE
Emily Bertolini, EGLE
Dave Favero, RACER Trust
Brendan Mullen, RACER Trust

Enclosures:

Attachment

- 1 2025 Project Schedule

RACER Pontiac North Campus
2025 Annual EA Budget Request
Project Schedule

ID	Task Name	Duration	Start	Finish	12/22	January 1 1/5	1/19	February 1 2/2	2/16	March 1 3/2	3/16	3/30	April 1 4/13	4/27	May 1 5/11	5/25	June 1 6/8	6/22	July 1 7/6	7/20	August 1 8/3	8/17	September 1 8/31	9/14	9/28	October 1 10/12	10/26	November 1 11/9	11/23	December 1 12/7	12/21
1	Task 3 - Corrective Measures Institutional Controls																														
2	DRC attachment support	TBD																													
3	Task 4 - Corrective Measures - Soil	163 days	Wed 1/1/25	Fri 8/15/25	[Gantt bar from Jan 1 to Aug 15]																										
4	CA Investigation Continued if Needed	TBD																													
5	Semi-Annual Progress Report Prep/Submittal for 2nd Half of 2024	11 days	Wed 1/1/25	Wed 1/15/25	[Gantt bar from Jan 1 to Jan 15]																										
6	Semi-Annual Progress Report Prep/Submittal for 1st Half of 2025	10 days	Tue 7/1/25	Mon 7/14/25	[Gantt bar from Jul 1 to Jul 14]																										
7	Fiero Soil Vapor Sampling, 1st and 2nd QTRS, then 3rd QTR	15 days	Mon 2/10/25	Fri 8/15/25	[Gantt bar from Feb 10 to Feb 25]																										
8	Task 5 - Corrective Measures - GW / LNAPL	260 days?	Thu 1/2/25	Wed 12/31/25	[Gantt bar from Jan 2 to Dec 31]																										
9	Annual Groundwater Sampling	5 days	Mon 10/6/25	Fri 10/10/25	[Gantt bar from Oct 6 to Oct 10]																										
10	Preparation of 2024 Annual GW Report	63 days	Thu 1/2/25	Mon 3/31/25	[Gantt bar from Jan 2 to Mar 31]																										
11	Annual Inspections	2 days?	Tue 9/16/25	Wed 9/17/25	[Gantt bar from Sep 16 to Sep 17]																										
12	Annual Inspection Report 2025	21 days?	Mon 12/1/25	Mon 12/29/25	[Gantt bar from Dec 1 to Dec 29]																										
13	Continued Well Repair, Protection and Abandonment Activities	130 days	Thu 7/3/25	Wed 12/31/25	[Gantt bar from Jul 3 to Dec 31]																										
14	Joslyn Annual Groundwater Sampling	5 days	Mon 9/15/25	Fri 9/19/25	[Gantt bar from Sep 15 to Sep 19]																										
15	Fiero Semi-Annual Groundwater Monitoring	10 days	Mon 3/10/25	Fri 11/7/25	[Gantt bar from Mar 10 to Mar 20]																										
16	Task 7 - Storm Sewers (Seep)	261 days?	Wed 1/1/25	Wed 12/31/25	[Gantt bar from Jan 1 to Dec 31]																										
17	Montcalm Seep Control System OMM	261 days	Wed 1/1/25	Wed 12/31/25	[Gantt bar from Jan 1 to Dec 31]																										
18	Optimization Activities	TBD																													
19	Task 31 - PFAS Characterization	TBD																													
20	Storm Sewer Sampling	TBD																													
21	Task 32: PFAS Risk/Exposure Pathway Analysis																														
22	Risk/Exposure Pathway Analysis Report	TBD																													
23	Task 37: PFAS Sampling	5 days	Mon 10/6/25	Fri 10/10/25	[Gantt bar from Oct 6 to Oct 10]																										

RACER PNC/Fiero 2022 Schedule
Date: Thu 1/16/25

Task		Summary		External Milestone		Inactive Summary		Manual Summary Rollup		Finish-only	
Split		Project Summary		Inactive Task		Manual Task		Manual Summary		Progress	
Milestone		External Tasks		Inactive Milestone		Duration-only		Start-only		Deadline	