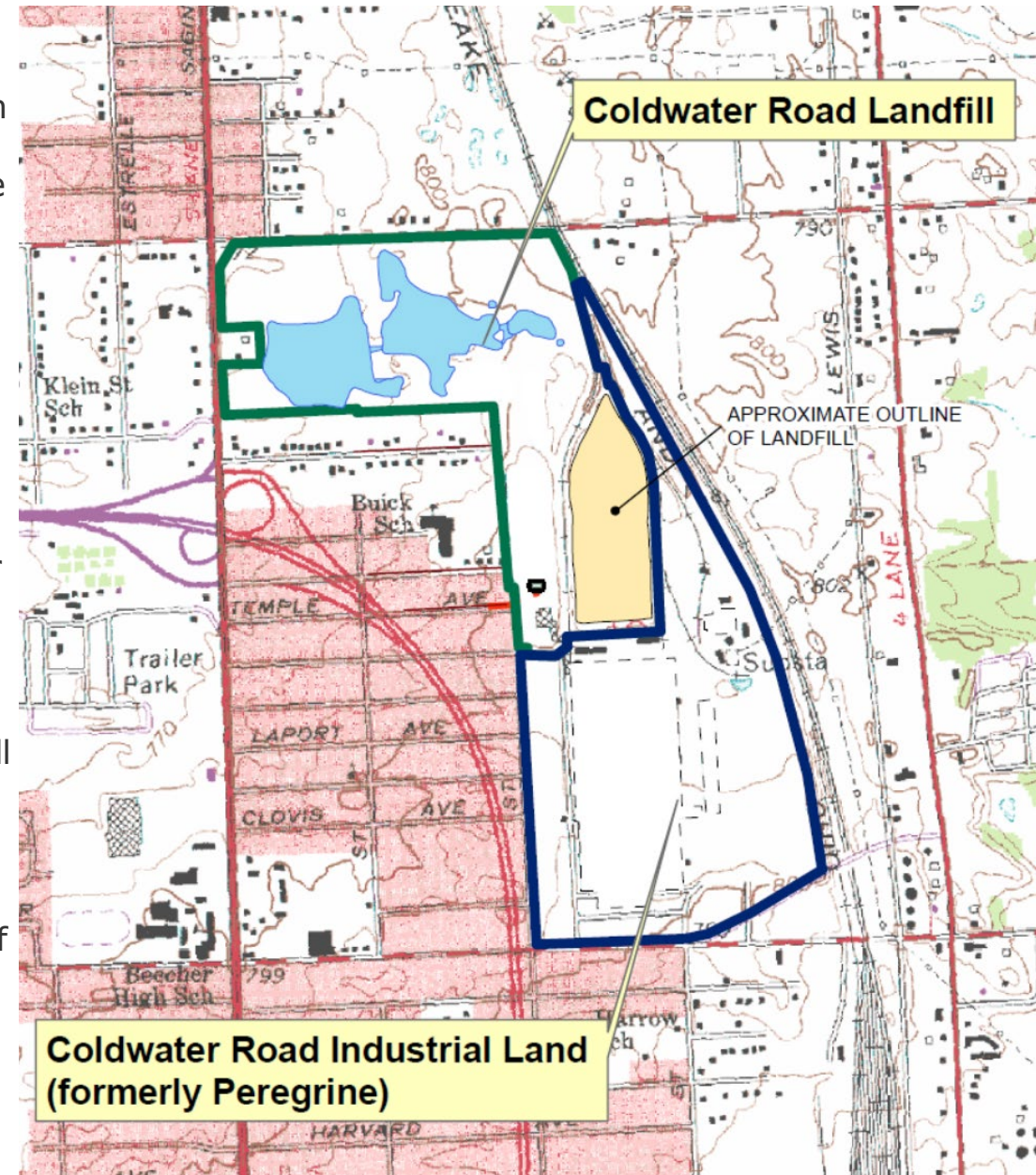


DRAFT

RACER TRUST
COLDWATER ROAD SITE
PFAS ACTIVITY PROGRESS
REPORT – July 18, 2022

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.
- ❑ 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 include replacement and treatment of one residential well, continued operation of the pre-treatment system for landfill discharges to the sanitary sewer and working toward eliminating PFAS discharge offsite through storm and sanitary sewers.
- ❑ 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

- The 2022 Annual groundwater PFAS monitoring was completed the weeks of June 6, 2022 and June 13, 2022. Summarizing and evaluating the results is in progress.
- Samples were collected from 1217 E. Stanley Road, 1278 E. Stanley Road, and 1320 E. Stanley Road on March 16, 2022. The March results from these wells were below the drinking water criteria, with the exception of the “raw” water from 1278 E. Stanley Road that had PFOS at a concentration of 23 ng/L.
- Samples were collected from 1278 E. Stanley Road and 1320 E. Stanley Road on July 7, 2022, and the results are pending.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

❑ STORM WATER – Pond Management

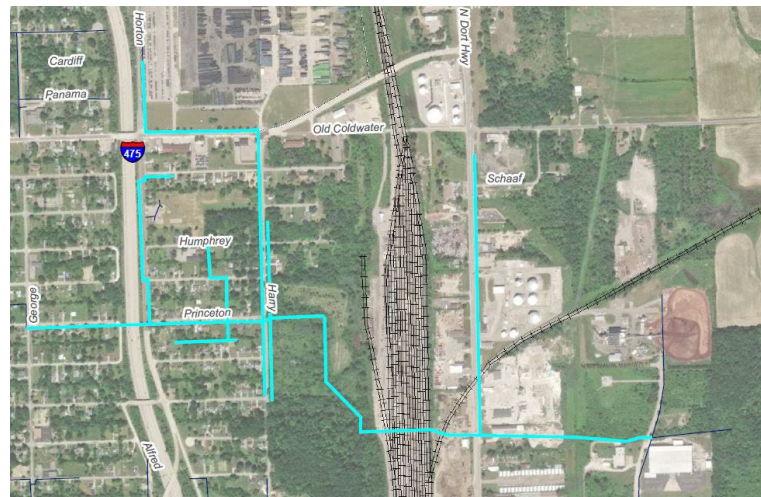
- ❑ After coordination with EGLE, a temporary PFAS treatment system was setup and started on April 1, 2022 to treat the pond water from the Western Pond prior to discharge to the storm sewer system. Water from the Middle Pond was conveyed to the Western Pond by use of a siphon to lower the water level in the Middle Pond. The temporary PFAS treatment system was shutdown on July 7, 2022. The Middle Pond level is approximately 1.8 feet below the top of the spillway crest.
- ❑ Submitted a Corrective Action Plan and NPDES Permit Application on June 3, 2022 to EGLE's Water Resources Division addressing Violation Notice No. VN-012757.
- ❑ Areas of erosion to the Middle and Western Pond berms were repaired the week of May 16, 2022.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

❑ STORM WATER - Sewers

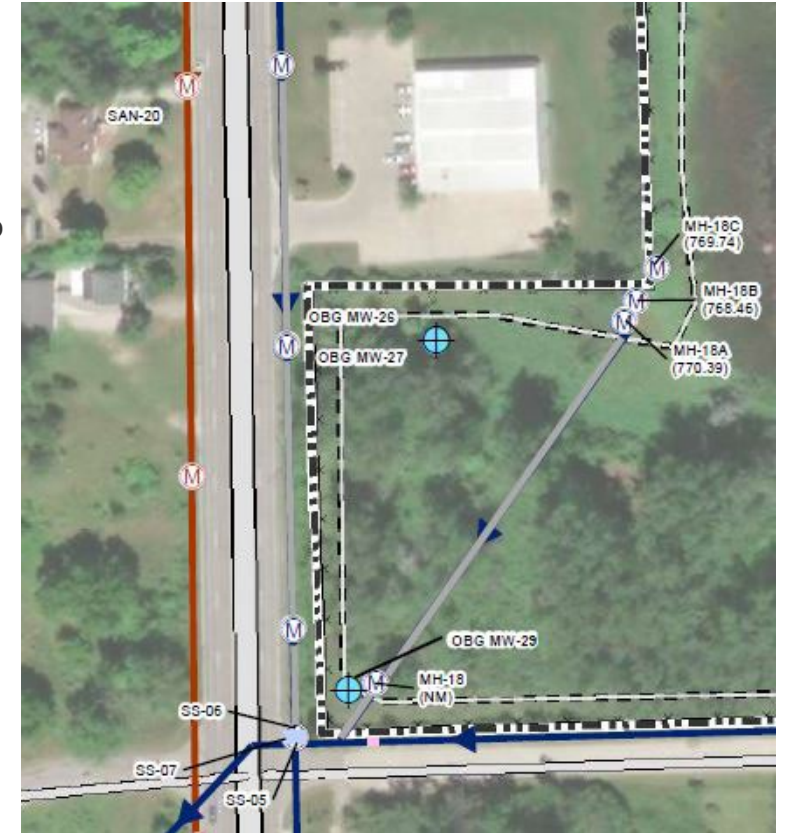
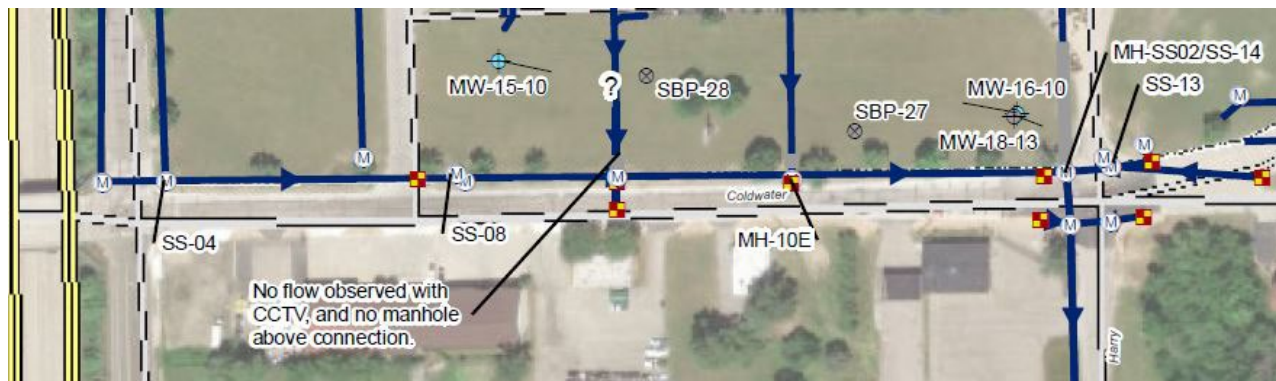
- ❑ Plugged the storm sewer pipe leading to “Outfall SS-02” to stop leak on May 31, 2022.
- ❑ Conducted CCTV inspections of storm sewers along Coldwater Road on June 1, 2022.
- ❑ Collected additional storm water sewer samples along Coldwater Road south of the Site on April 14, 2022, May 16, 2022, and June 22, 2022.
- ❑ Submitted the South of Site Storm Sewer Evaluation to EGLE on July 15, 2022.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER - Inspection

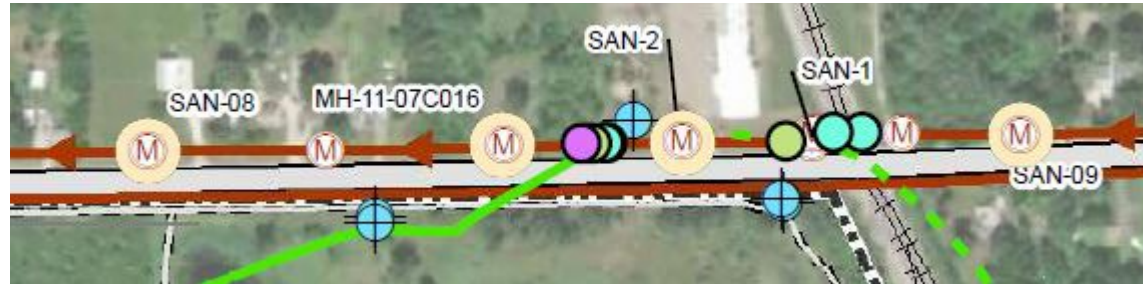
- The second quarter 2022 storm water inspection was conducted on June 30, 2022, observations include:
 - No discharge from the ponds to off-site or overtopping of berms was observed.
 - There was no flow from the railroad spurs east and west of the landfill that convey stormwater to the culvert/swale, which discharges to the Middle Pond.
 - Flow was observed from the north and south in the manhole on the corner Saginaw Road and Klein Street, post lining samples will be sampled eight weeks after sealing of MH-18A and MH-18B.
 - No flow has been observed from the Site in manhole MH-17A since the section of storm sewer between manholes MH-16 and MH-17A were sealed in June 2021.
 - No dripping was observed from the plug at SS-02 since the storm water pipe leading to "Outfall SS-02" was plugged.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

❑ SANITARY SEWERS

- ❑ Conducted CCTV inspections of sanitary sewer along Stanley Road on May 31, 2022, and the videos are being evaluated.
- ❑ Continued preparing the completion report documenting the lining of sewers and sealing of manholes west of the Site.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

LANDFILL

- The GAC PFAS removal system is operating as designed and GAC drums are changed out and disposed of as necessary. PFAS results, including GAC system performance, are reported quarterly to EGLE and the local sewer municipalities. The report for the 1st Qtr. 2022 was submitted on April 25, 2022 and the system continues to reduce PFAS concentrations to below the discharge criteria. The 2nd Qtr. 2022 report will be submitted on or before July 28, 2022.



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

Activity	Schedule
<p>PFAS Monitoring:</p> <ul style="list-style-type: none"> ➤ Submit the Periodic Report on Continued Compliance (PRCC) for Discharge to Sanitary Sewer from Leachate Treatment System ➤ Submit Annual PFAS Groundwater and Leak Detection System (LDS) Report ➤ Collect Sanitary Sewer Samples along Stanley Road and West of Site ➤ Storm Water Inspections and Sampling (SS-17A & SS-02), if Flow is Observed ➤ Residential Well Sampling (1217, 1278, & 1320 E. Stanley Road) ➤ Post Lining Storm Water Sampling Along E. Klein Street and Saginaw Road ➤ Surface Water Levels (Western & Middle Ponds) 	<p>July 28, 2022</p> <p>August</p> <p>August</p> <p>September</p> <p>Late September</p> <p>Late September/October</p> <p>At Least Monthly</p>
<p>PFAS Corrective Measures:</p> <ul style="list-style-type: none"> ➤ Seal Leaks in Onsite Manholes MH-18A and MH-18B ➤ Prepare and Submit Dam Completion Report and Emergency Action Plan ➤ Prepare and Submit Storm Water Treatability Study ➤ Prepare and Submit Sewer Lining Completion Report ➤ Prepare and Submit Updated Options Analysis for Storm (Pond) Water ➤ Work with EGLE to Obtain NPDES Permit for any Needed Discharges from the Middle/Western Ponds ➤ If Necessary, Remobilize Treatment System for Discharge from Western/Middle Ponds 	<p>Late July/August (Dependent on Contractor Availability)</p> <p>July 22, 2022</p> <p>July 29, 2022</p> <p>August/September</p> <p>September 16, 2022</p> <p>As Necessary</p> <p>As Necessary</p>