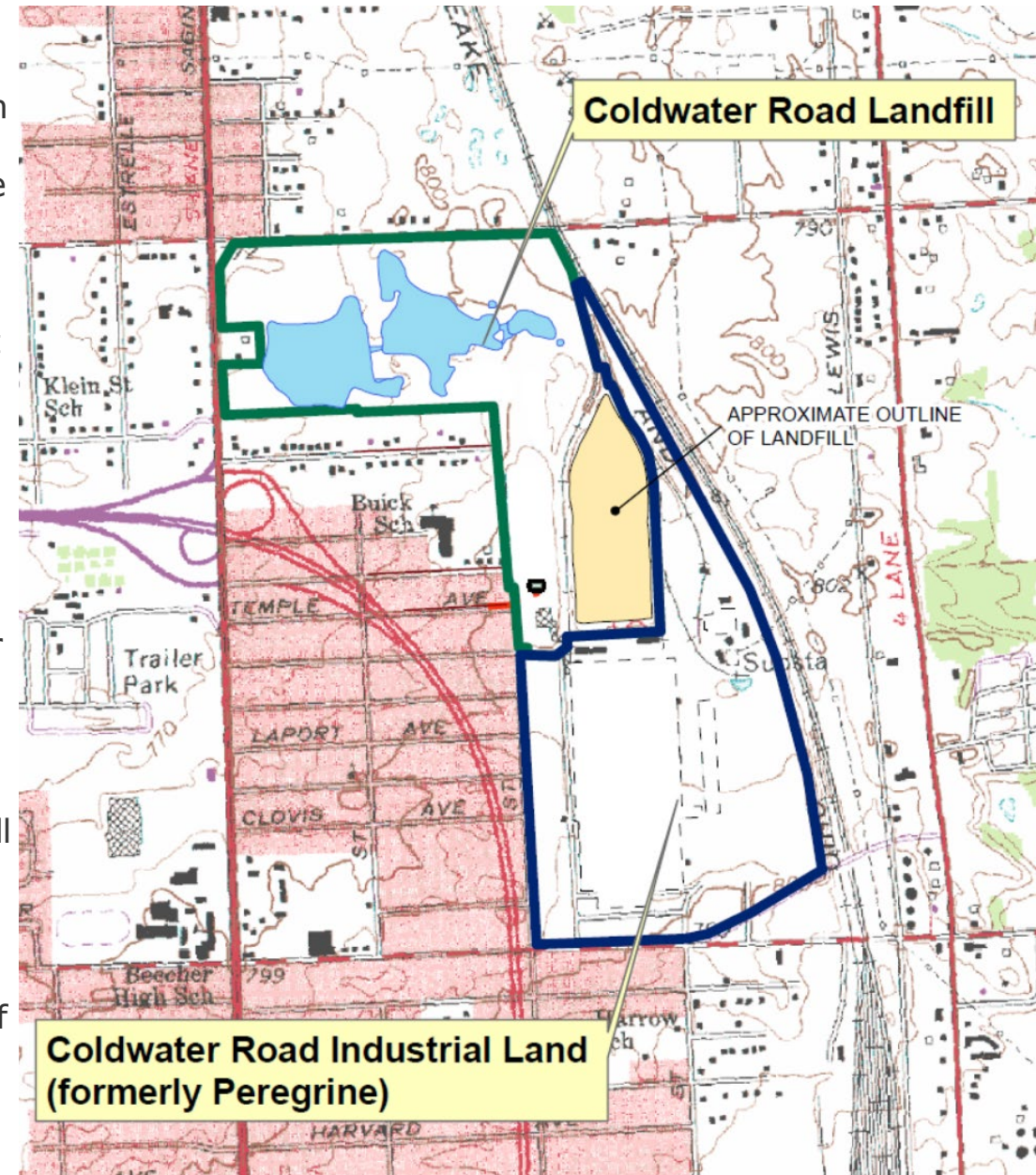


RACER TRUST  
COLDWATER ROAD SITE  
PFAS ACTIVITY PROGRESS  
REPORT – October 25, 2022

# 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. 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 include replacement and treatment of one residential well, 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.
- ❑ 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 Report summarizing and evaluating the results was submitted to EGLE on September 28, 2022.
- Samples were collected from private wells at 1278 E. Stanley Road, and 1320 E. Stanley Road on July 7, 2022. The July 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 41 ng/L.
- Samples were collected from private wells at 1217 E. Stanley Road, 1278 E. Stanley Road, and 1320 E. Stanley Road on October 6, 2022, and the results are pending.



# PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

## ❑ STORM WATER – Pond Management

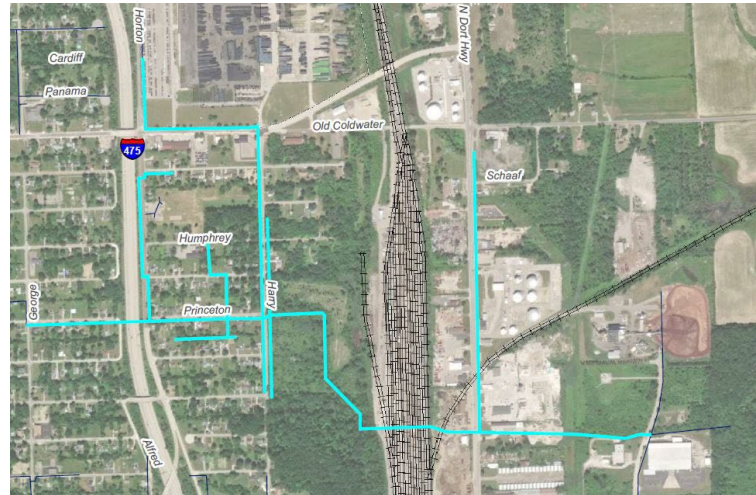
- ❑ A temporary PFAS treatment system was remobilized and started on October 11, 2022 to treat the pond water from the Western Pond prior to discharge to the storm sewer system. It is anticipated that the system will be in operation for two months. Water from the Middle Pond is conveyed to the Western Pond by use of a siphon to lower the water level in the Middle Pond.
- ❑ An Emergency Action Plan (EAP) related to hypothetical failures of the Middle Pond Berm (Dam) was submitted to the Genesee County Emergency Management, Homeland Security Division (EMHSD), and EGLE on July 19, 2022. A training session with applicable stakeholders was conducted on September 14, 2022. The EAP is being updated based on feedback from the stakeholders.
- ❑ Prepared and submitted the updated Options Analysis for the storm (pond) water on September 16, 2022.
- ❑ Prepared and submitted the updated Storm Water Treatability Study on September 9, 2022.



# PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

## STORM WATER - Sewers

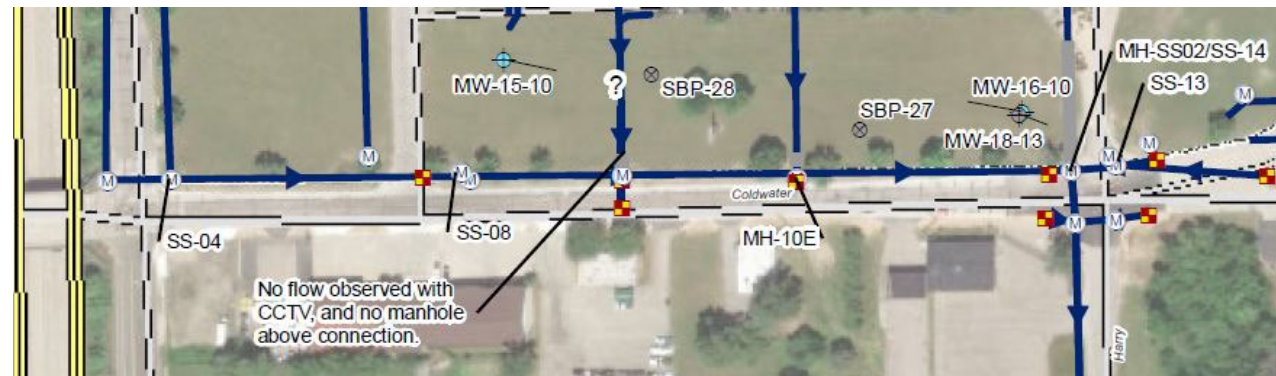
- Sealed Leaks in Onsite Manholes MH-18A and MH-18B on September 6, 2022.
- Collected post lining storm water sampling along Saginaw Road (SS-10) on September 7, 2022. Manhole (MH-18) has been dry since the lining and sealed leaks were completed.
- Completed further observation and evaluation of storm sewers south of the Site.
- An update to the South of Site Storm Sewer Evaluation is being prepared and will be provided in the near future.



# PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

## STORM WATER - Inspection

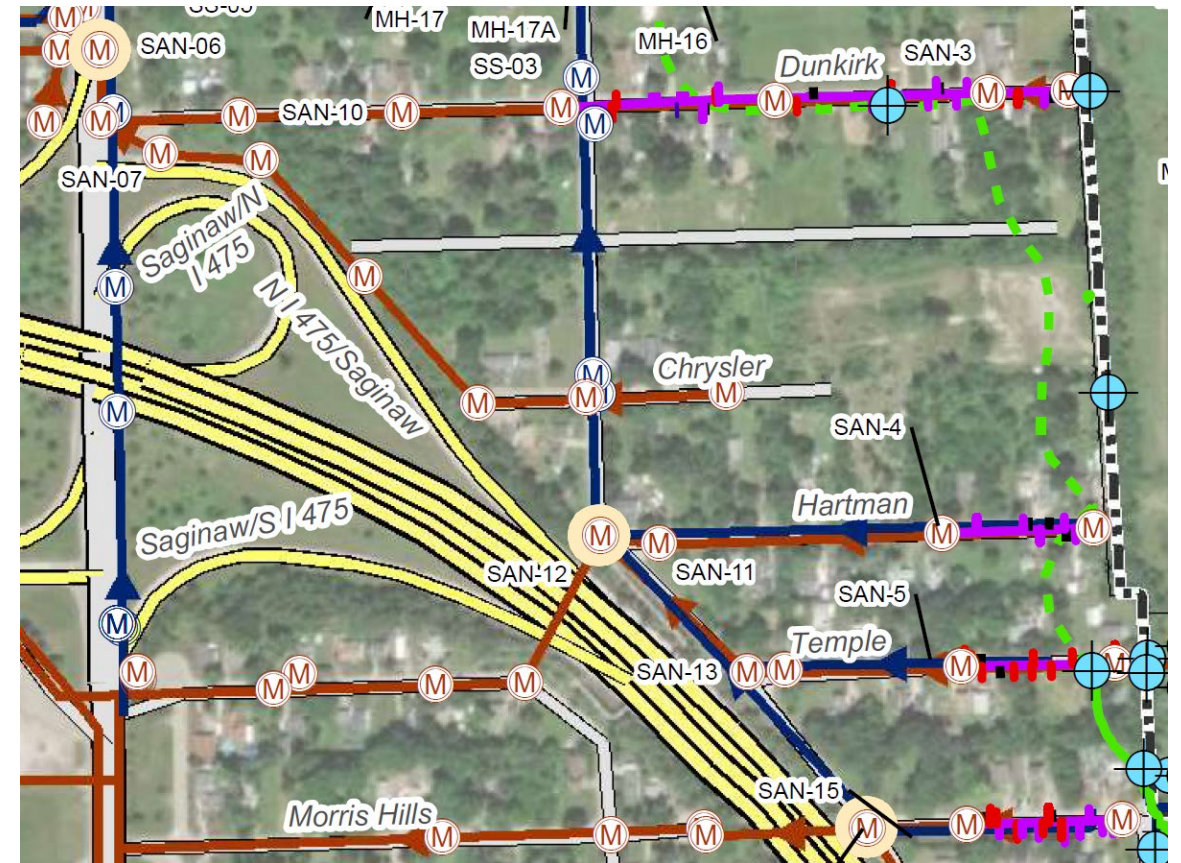
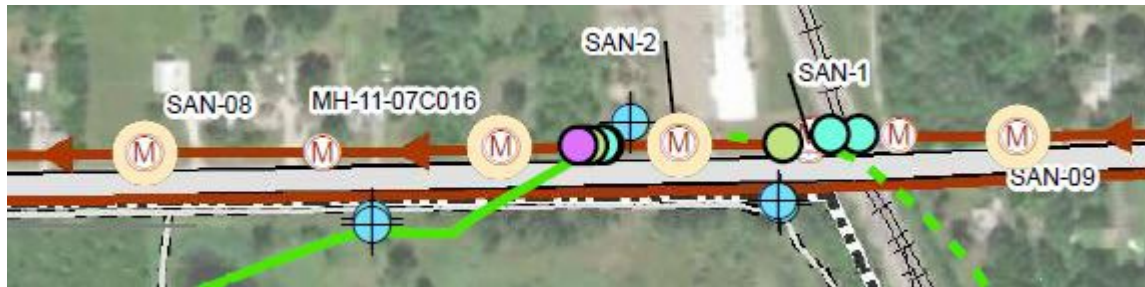
- The third quarter 2022 storm water inspection was conducted on September 28, 2022, observations include:
  - No discharge from the ponds to off-site or overtopping of berms was observed.
  - There was no flow from the railroad spurs east and west of the landfill that convey stormwater to the culvert/swale, which discharges to the Middle Pond.
  - Flow was observed coming from the north in the manhole on the corner Saginaw Road and Klein Street, post lining samples were collected in SS-10 on September 7, 2022. No flow was observed coming from the south or east in this manhole.
  - 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 MH-10E since the storm water pipe leading to the outfall was plugged.
  - 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

- ❑ Collected Sanitary Sewer Samples along Stanley Road and West of Site on September 7, 2022. An update regarding the analytical results will be provided in the near future.
- ❑ 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 2<sup>nd</sup> Qtr. 2022 was submitted on August 1, 2022 and the system continues to reduce PFAS concentrations to below the discharge criteria. The 3<sup>rd</sup> Qtr. 2022 report will be submitted on or before October 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"> <li>➤ Submit the Periodic Report on Continued Compliance (PRCC) for Discharge to Sanitary Sewer from Leachate Treatment System</li> <li>➤ Prepare and Submit Email Providing Summary of Stanley Road Sanitary Sewer Sampling Results</li> <li>➤ Collect Sanitary Sewer Samples along Stanley Road and West of Site</li> <li>➤ Storm Water Inspections and Sampling (SS-17A &amp; SS-02), if Flow is Observed</li> <li>➤ Residential Well Sampling (1217, 1278, &amp; 1320 E. Stanley Road)</li> <li>➤ Post Lining Storm Water Sampling Along E. Klein Street and Saginaw Road</li> <li>➤ Surface Water Levels (Western &amp; Middle Ponds)</li> </ul>	<p>October 28, 2022</p> <p>November</p> <p>December</p> <p>December</p> <p>Late December</p> <p>December</p> <p>At Least Monthly</p>
<p>PFAS Corrective Measures:</p> <ul style="list-style-type: none"> <li>➤ Prepare and Submit Updated South of Site Storm Sewer Evaluation</li> <li>➤ Update Emergency Action Plan (EAP)</li> <li>➤ Prepare and Submit Sewer Lining Completion Report</li> <li>➤ Work with EGLE to Obtain NPDES Permit for any Needed Discharges from the Middle/Western Ponds</li> <li>➤ Operate Temporary Treatment System for Discharge from Western/Middle Ponds</li> </ul>	<p>October</p> <p>November</p> <p>November/December</p> <p>As Necessary</p> <p>Through Early December</p>