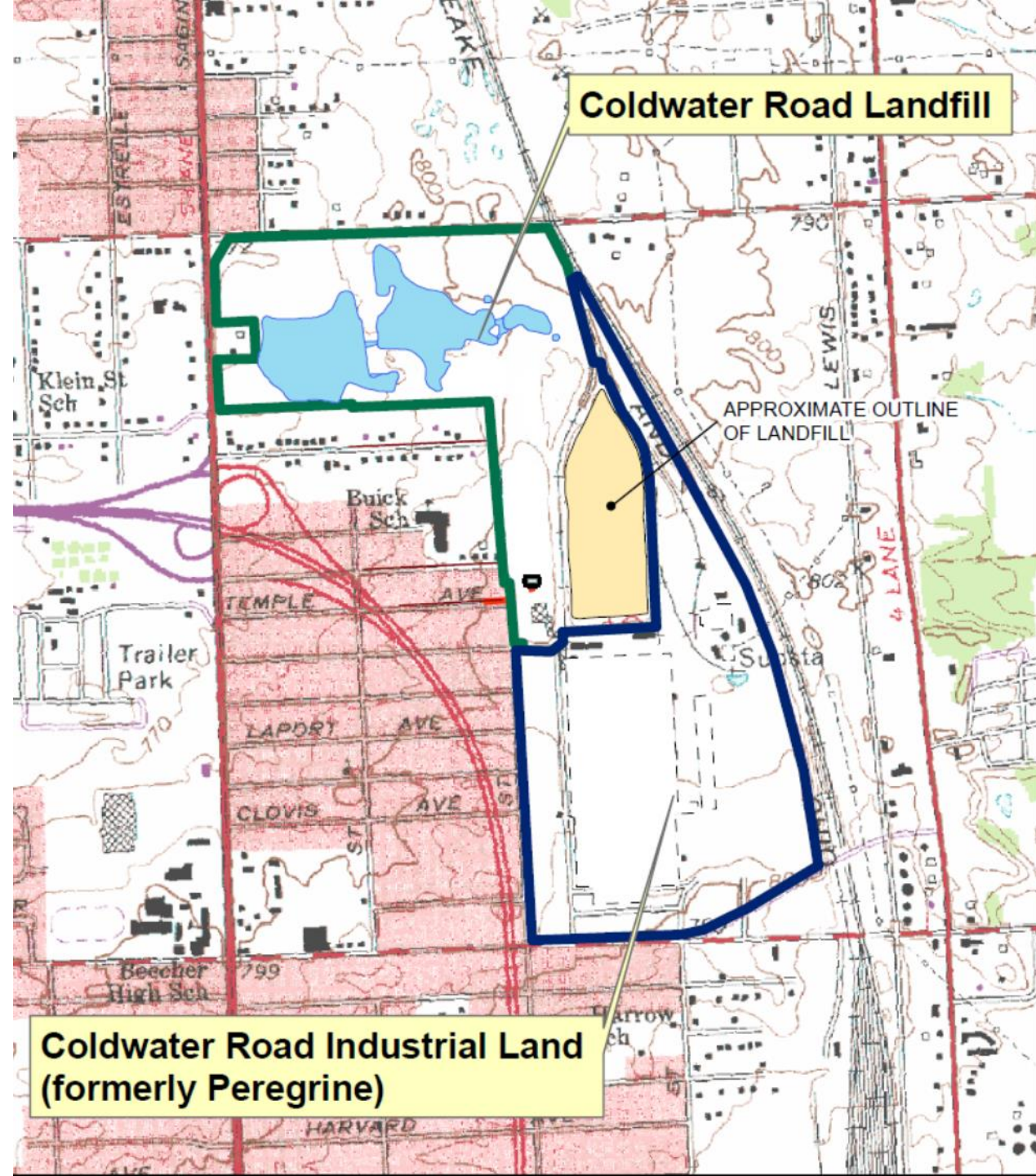


RACER TRUST
COLDWATER ROAD SITE
PFAS ACTIVITY PROGRESS
REPORT – April 15, 2022

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.
- ❑ Vapor intrusion characterization and evaluation is ongoing near a residential area along the southwestern portion of the Landfill property.
- ❑ 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 is currently scheduled for June 2022.
- At the request of the homeowner, a drinking water PFAS sample was collected from 1073 E. Stanley Road on January 19, 2022. PFAS were not detected in the sample.
- Samples were collected from 1278 E. Stanley Road, and 1320 E. Stanley Road on January 5, 2022. The January 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 19 ng/L.
- 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.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

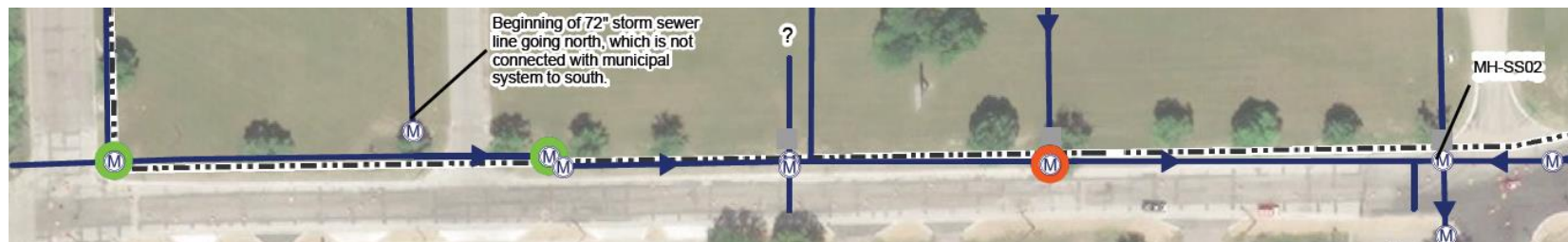
❑ STORM WATER

- ❑ The storm water storage in the Middle and Western Ponds has not been performing as modeled, resulting in water flowing over the overflow structure of the Middle Pond and overtopping a portion of the berm for the Western Pond. Overtopping was first observed on December 13, 2021 and was noted to have stopped on January 14, 2022, but began again on February 24, 2022.
- ❑ Through 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 will be conveyed to the Western Pond by use of a siphon to lower the water level in the Middle Pond.
- ❑ A draft Stormwater Management Improvement Corrective Measures Options Analysis was submitted to EGLE on March 22, 2022.
- ❑ A treatability study for treatment of the pond water is currently being conducted and results are expected in approximately 8 to 10 weeks.

PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER (Continued)

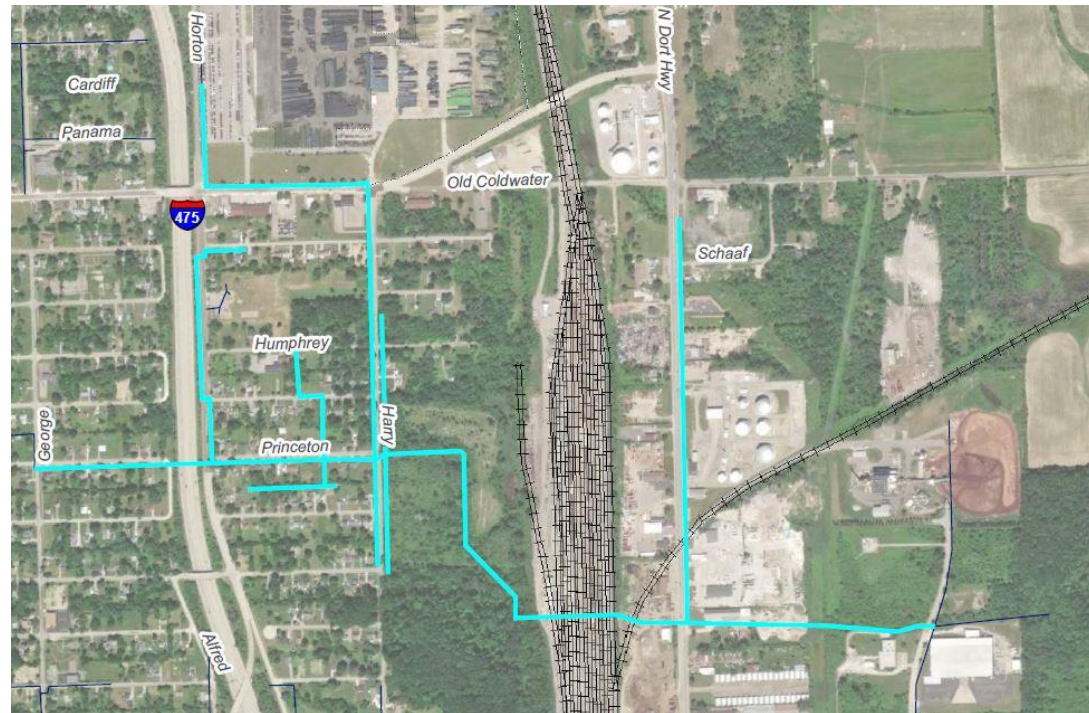
- The fourth quarter 2021 and first quarter 2022 storm water inspections were conducted on December 21, 2021 and March 10, 2022, observations include:
 - No discharge from the ponds to off-site was observed on December 21, 2021; however, water was observed discharging from the Western Pond during the March 10, 2022 inspection.
 - A trickle was observed at manhole MH-18B and a little flow was observed in manholes MH-18A and MH-18 from water entering the sewers below grade. The leaks to the manholes will be sealed when possible, likely in June.
 - The railroad spurs east and west of the landfill convey stormwater to the culvert/swale, which discharges to the Middle Pond.
 - Flow was observed along Saginaw Road and Klein Street, which will be sampled when possible, likely June.
 - 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.
 - Flow was observed along Coldwater Road following recent rains. Water was observed dripping from the plug at SS-02 during the December 21, 2022 inspection, was sampled, and had a result of 86 ng/L for PFOS. This storm sewer will be sealed when possible based on contractor availability.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

□ STORM WATER (Continued)

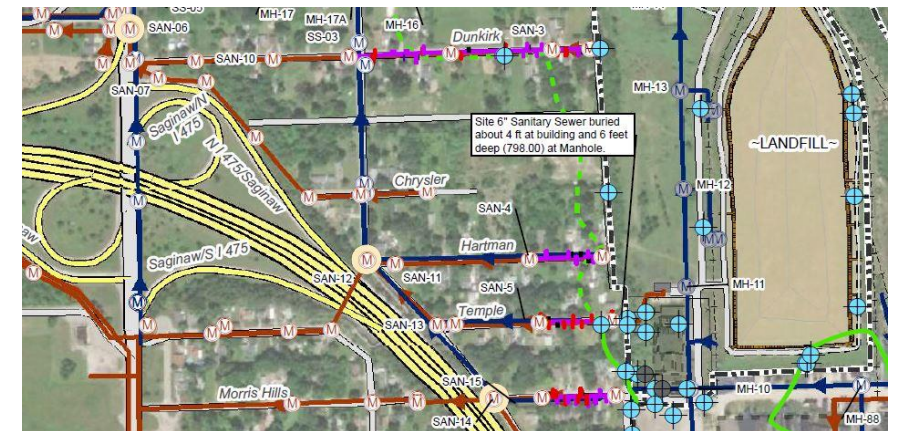
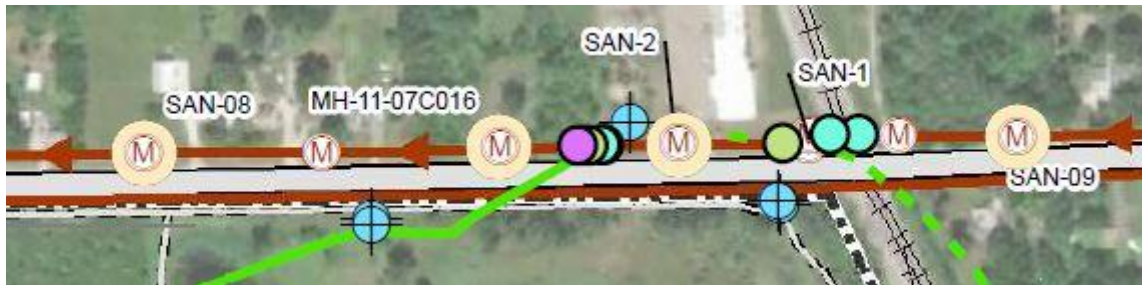
- Numerous corrective measures to mitigate the discharge of PFAS impacted storm water from the Site have been undertaken. The following were completed since December 2021:
 - December 2021/January 2022 – Installed sewer liners for onsite storm sewer and storm sewer along eastside of Saginaw Road.
 - March 2022 – A request was made by EGLE WRD to assess the storm water sewers in the area south of the Site, which is currently being conducted.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

❑ SANITARY SEWERS

- ❑ Numerous corrective measures to mitigate the infiltration of PFAS impacted groundwater entering the sanitary sewers adjacent to the Site have been undertaken in accordance with our December 23, 2020 Sewer Rehabilitation (Lining) letter provided to EGLE and the Sewer Rehabilitation Task 1A Memo provided to EGLE on January 28, 2021. The following were completed since December 2021:
 - December 2021/January 2022 – Installed sanitary sewer main liners and lateral (connections between residences and sewer mains) liners along Dunkirk Avenue, Hartman Street, Temple Avenue, and Morris Hills Parkway. There were a few laterals that were unable to be lined which will be discussed in the summary report.
- ❑ On December 9, 2021, four sanitary sewer samples were collected from manholes north of the Site along Stanley Road. The concentration of PFOS decreased in the upgradient manholes and increased in the downgradient manhole SAN-08. The data was provided in an email to the distribution list on January 7, 2022.
- ❑ On March 31, 2022, post lining samples were collected from three sanitary sewer manholes west of the Site, and an additional round of sanitary sewer samples were collected from four sanitary sewer manholes along Stanley Road and results are pending.



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 latest report (for 4Q 2021) was submitted on January 26, 2022 and indicated that the system continues to reduce PFAS concentrations to below the discharge criteria.



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

Activity	Schedule
PFAS Monitoring:	
➤ Post Lining Storm Water Sampling Along E. Klein Street and Saginaw Road	June
➤ Residential Well Sampling (1278, & 1320 E. Stanley Road)	Late June
➤ Surface Water Levels (Western & Middle Ponds)	On Going
➤ Storm Water Inspections and Sampling (SS-17A & SS-02), if Flow is Observed	Late June
➤ Annual PFAS Groundwater and Leak Detection System (LDS) Sampling	June
PFAS Corrective Measures:	
➤ Lower Water Levels in Middle and Western Pond and Repair Spillway and Berm Erosion	On Going
➤ Seal Leaks in Onsite Manholes MH-18A and MH-18B	Late May or June
➤ CCTV Video Inspection of Sanitary Sewer Along Stanley Road	April
➤ Plugging of Onsite Storm Water Sewer North of Manhole SS-02 along Coldwater Road	April
➤ Prepare Sewer Lining Completion Report	June or July
➤ Complete Treatability Study and Send Out Request for Proposals for Treatment System	June
➤ Finalize Dam Permit Completion Report	June