



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
MATERIALS MANAGEMENT DIVISION



PHILLIP D. ROOS
DIRECTOR

November 13, 2025

VIA EMAIL

Brendan Mullen, Cleanup Manager – Michigan
RACER Trust
1505 Woodward Avenue, Suite 200
Detroit, Michigan 48226

Dear Brendan Mullen,

SUBJECT: Approval: *2025 Industrial Avenue Sanitary Video Inspection Work Plan*;
RACER Buick City; MID 005 356 712;
Waste Data System Number 393423

The Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD), reviewed the October 8, 2025, *2025 Industrial Avenue Sanitary Video Inspection Work Plan* (Work Plan), prepared by Arcadis U.S., Inc. on behalf of the Revitalizing Auto Communities Environmental Response (RACER), Trust, for the Buick City facility located at 902 East Leith Street, Flint, Michigan. The Work Plan was reviewed for compliance with Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the administrative rules promulgated thereunder (Part 111), and the August 5, 2020, Corrective Action Consent Order, MMD 111-02-2020 (CACO).

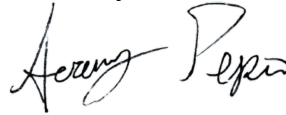
MMD and RACER met to discuss the Work Plan on October 8, 2025. The enclosed emails document the comments MMD provided during the meeting, RACER's responses to those comments, and MMD's informal approval of the Work Plan to allow RACER to implement the work outlined in a timely manner.

Based on MMD's review and the resolution provided to the comments discussed on October 8, 2025, the Work Plan is approved.

Brenden Mullen
Page 2
November 13, 2025

Please contact me if you have any questions at 517-219-2288; PepinJ2@Michigan.gov;
or EGLE-MMD-HWS@Michigan.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Pepin". The signature is fluid and cursive, with the first name "Jeremy" and last name "Pepin" clearly distinguishable.

Jeremy Pepin, Environmental Engineer
Corrective Action Unit
Hazardous Waste Section
Materials Management Division
517-219-2288

Cc: Dave Favero, RACER Trust, Deputy Cleanup Manager – Michigan
Patrick Curry, Arcadis, Vice President
Tiffany Linder, Arcadis, Project Manager
Kimberly Tyson, EGLE
Elizabeth Garver, EGLE
Steve Busch, EGLE
Brian Zuber, EGLE
Evin Maguire, EGLE
Shaun Shields, EGLE
Plan Approval – CA

From: [Linder, Tiffany](#)
To: [Maguire, Evin \(EGLE\)](#); [Shields, Shaun \(EGLE\)](#); [Pepin, Jeremy \(EGLE\)](#)
Cc: [Dave Favero](#); [Brendan Mullen](#); [Curry, Patrick](#); [Tiffany Minder](#); [Garver, Elizabeth \(EGLE\)](#)
Subject: RE: RACER Buick City Industrial Ave Sanitary Video Inspection Work Plan
Date: Monday, October 13, 2025 12:25:56 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

**CAUTION: This is an External email. Please send suspicious emails to
abuse@michigan.gov**

Hello Evin,

Thank you for your comments and I have included our responses in the email below for each item. We apologize for spelling your name incorrectly on several of these work plans – we will correct that going forward.

Tiffany A. Linder

Certified Project Manager | Arcadis of Michigan, LLC

I work flexibly. If you are receiving this message outside of your normal working hours, I do not expect you to take action or respond. Thank you!

From: Maguire, Evin (EGLE) <MaguireE@michigan.gov>
Sent: Friday, October 10, 2025 2:05 PM
To: Linder, Tiffany <Tiffany.Linder@arcadis.com>; Shields, Shaun (EGLE) <ShieldsS5@michigan.gov>; Pepin, Jeremy (EGLE) <pepinj2@michigan.gov>
Cc: Dave Favero <dfavero@racertrust.org>; Brendan Mullen <bmullen@racertrust.org>; Curry, Patrick <Patrick.Curry@arcadis.com>; Tiffany Minder <tminder@cityofflint.com>; Garver, Elizabeth (EGLE) <GARVERE2@michigan.gov>
Subject: RE: RACER Buick City Industrial Ave Sanitary Video Inspection Work Plan

Arcadis Warning: Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

Tiffany-

As discussed during the October 8 meeting, the MMD finds the work plan acceptable and approves its implementation, scheduled for October 13, on the condition that the following comments addressed. A formal approval letter will be provided once these comments are resolved. Given that the work is scheduled to start in less

than one business day, an email response will be sufficient to address these comments.

1. The Task the work is being completed under should be included in the work plan.

We will add the Tasks to the text going forward but they are included in the top part of reports/memos under the heading of Project Number – these activities will go under Task 03200 “Task 32”

2. A cost estimate should be included in the work plan.

Below is a cost estimate for the video work:

The total estimated cost for this scope of work is \$10,361.00. This cost estimate encompasses expenses associated with coordination, preparation, and scheduling of the scope of work by Arcadis of Michigan, LLC (Arcadis) on behalf of RACER Trust, as well as required subcontractors (line jetting, video work, and traffic control). A cost breakdown is presented below.

Arcadis Subtotal	\$ 2,207.00
Jet Sanitary Sewer Line	\$ 2,125.00
Traffic Controls	\$ 3,429.00
Sewer Video Inspection	\$ 2,600.00
Subcontractor Subtotal	\$ 8,154.00

Estimated	
Total	\$ 10,361.00

3. In the Scope of Work, it says the lines will be jetted prior to scoping: *“Line jetting will be completed prior to video inspection for the removal of sediment materials and obstructions to allow for easier pass through of the camera equipment and better line visualization.”* Can you clarify whether you mean that jetting will remove sediments by flushing them further down the line, or if you mean the sediments will actually be collected and removed from the sewer line? If the sediments are actually removed, there needs to be a section on how they will be disposed of.

Young’s Environmental is completing the jetting activities and generally there is no waste generated from this process – during the jetting the sanitary waste (should have said this instead of sediment in the work plan) will just be pushed closer to the treatment plant – we have done jetting at Buick several times and the City also jetted lines prior to work in Hamilton I believe before we put the plugs in.

4. In relation to the previous comment, please clarify that you have coordinated with the City of Flint and that they approve of your methods, especially the jetting (essentially mobilizing and redepositing sediments, if they aren’t being removed). I’m copying Tiffany Minder here for awareness.

Yes, we have communicated with the City of Flint and mentioned that the camera work with line jetting beforehand was going to be completed. The City did jet the Industrial Ave lines before their camera work as well and before sampling along Hamilton I believe too, so I do not think they should have any concerns with jetting the lines along Industrial before the planned camera work.

5. It was mentioned that some manholes could not be located along this stretch. Will the camera work potentially be able locate these?

There are a few in relation to the James P. Cole work plan that could not be located but yes there are a couple along Industrial that could not be found, and the video work may be able to locate these.

6. My name is spelled wrong (and has been on the last few work plans as well).

Again, we apologize for the mis-spelling of both your first and last name – we will correct this going forward.

-Evin

Evin P Maguire, PhD
Senior Geologist
Chair, Remediation Advisory Team
Materials Management Division
Michigan Department of Environment, Great Lakes, and Energy
Phone: (517) 388-3525
[Connect With Us](#) | [Michigan.gov/EGLE](https://michigan.gov/EGLE)

From: Linder, Tiffany <Tiffany.Linder@arcadis.com>
Sent: Friday, October 10, 2025 10:43 AM
To: Maguire, Evin (EGLE) <MaguireE@michigan.gov>; Shields, Shaun (EGLE) <ShieldsS5@michigan.gov>; Pepin, Jeremy (EGLE) <PepinJ2@michigan.gov>
Cc: Dave Favero <dfavero@racertrust.org>; Brendan Mullen <bmullen@racertrust.org>; Curry, Patrick <Patrick.Curry@arcadis.com>
Subject: RE: RACER Buick City Industrial Ave Sanitary Video Inspection Work Plan

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Hello All,

I know this work plan was a quick turn but we are scheduled to begin work Monday next week so I wanted to check in to see if there were any questions on the scope of work or if EGLE could provide an email approval to proceed with the Industrial Video Work, thank you!

Tiffany A. Linder
Certified Project Manager | Arcadis of Michigan, LLC



I work flexibly. If you are receiving this message outside of your normal working hours, I do not expect you to take action or respond. Thank you!

From: Linder, Tiffany

Sent: Wednesday, October 8, 2025 10:38 PM

To: EGLE-MMD-HWS <egle-mmd-hws@michigan.gov>

Cc: Maguire, Evin (EGLE) <maguiree@michigan.gov>; Shields, Shaun (EGLE) <shieldss5@michigan.gov>; Pepin, Jeremy (EGLE) <pepinj2@michigan.gov>; Dave Favero <dfavero@racertrust.org>; Brendan Mullen <bmullen@racertrust.org>; Curry, Patrick <Patrick.Curry@arcadis.com>

Subject: RACER Buick City Industrial Ave Sanitary Video Inspection Work Plan

Hello All,

Please find attached the Industrial Avenue Sanitary Video Inspection Work Plan for the RACER Buick City Site. Please let us know if you have any questions. This work is planned to be completed on October 13/14, 2025. If approved please provide email approval for us to proceed with the work, thank you!

Tiffany A. Linder

Certified Project Manager

Arcadis of Michigan, LLC

28550 Cabot Drive, Suite 500 | Novi, MI | 48377 | USA

T +1 810 225 1928

M +1 517 861 0138

www.arcadis.com



I work flexibly. If you are receiving this message outside of your normal working hours, I do not expect you to take action or respond. Thank you!

This email and any files transmitted with it are the property of Arcadis and its affiliates. All rights, including without limitation copyright, are reserved. This email contains information that may be confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not an intended recipient, please note that any form of distribution, copying or use of this communication or the information in it is strictly prohibited and may be unlawful. If you have received this communication in error, please return it to the sender and then delete the email and destroy any copies of it. While reasonable precautions have been taken to ensure that no software or viruses are present in our emails, we cannot guarantee that this email or any attachment is virus free or has not been intercepted or changed. Any opinions or other information in this email that do not relate to the official business of Arcadis are neither given nor endorsed by it.

This email and any files transmitted with it are the property of Arcadis and its affiliates. All rights, including without limitation copyright, are reserved. This email contains information that may be confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not an intended recipient, please note that any form of distribution, copying or use of this communication or the information in it is strictly prohibited and may be unlawful. If you have received this communication in error, please return it to the sender and then delete the email and destroy any copies of it. While reasonable precautions have been taken to ensure that no software or viruses are present in our emails, we cannot guarantee that this email or any attachment is virus free or has not been intercepted or changed. Any opinions or other information in this email that do not relate to the official business of Arcadis are neither given nor endorsed by it.