RACER TRUST
LANSING PLANTS 2, 3, & 6

2025 Fourth Quarter Progress Report | January 21, 2026

More detailed reports are available on RACER's Webpage for this Site:
https://www.racertrust.org/properties/lansing-plant-2-industrial-land

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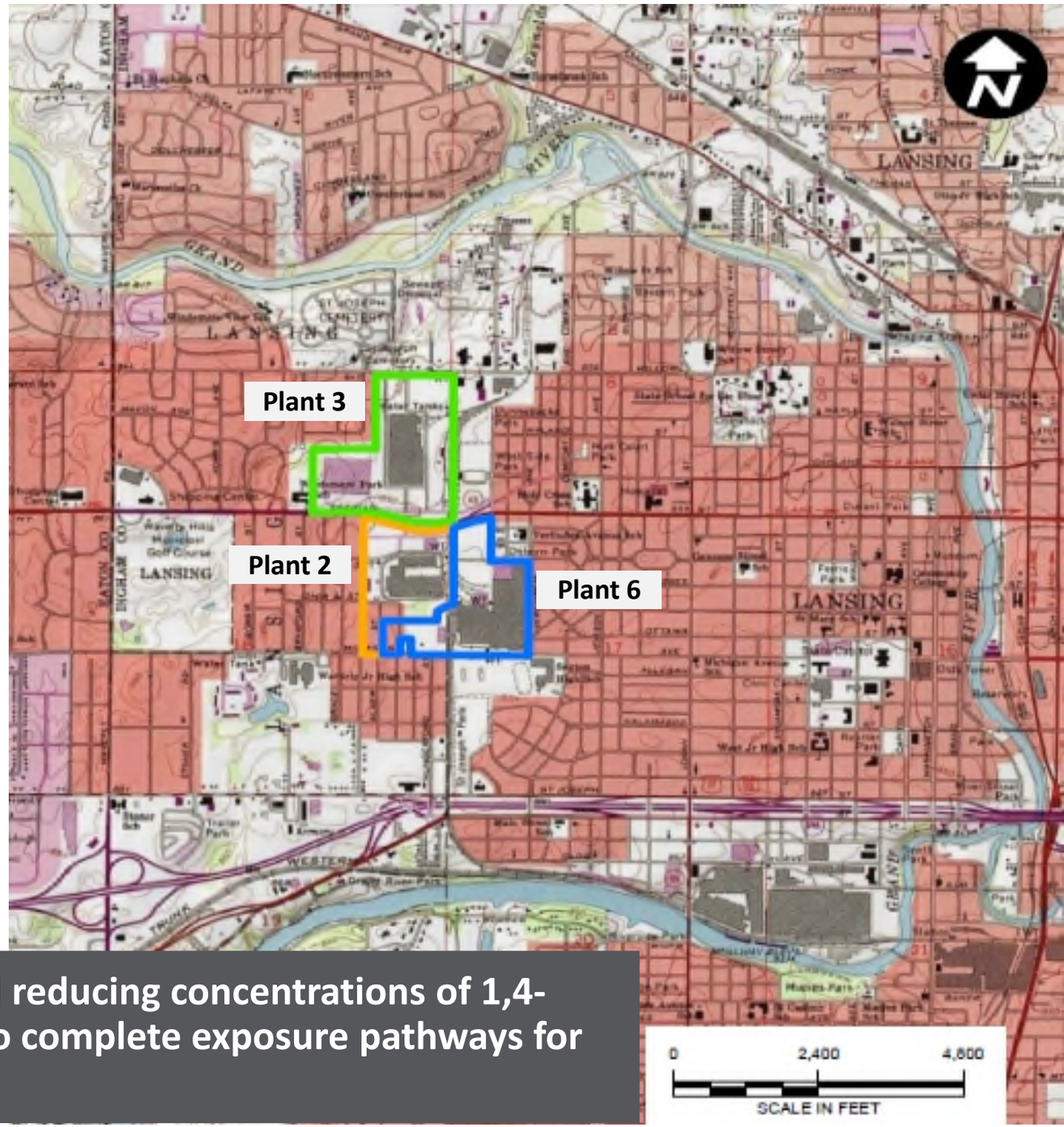
Site Introduction

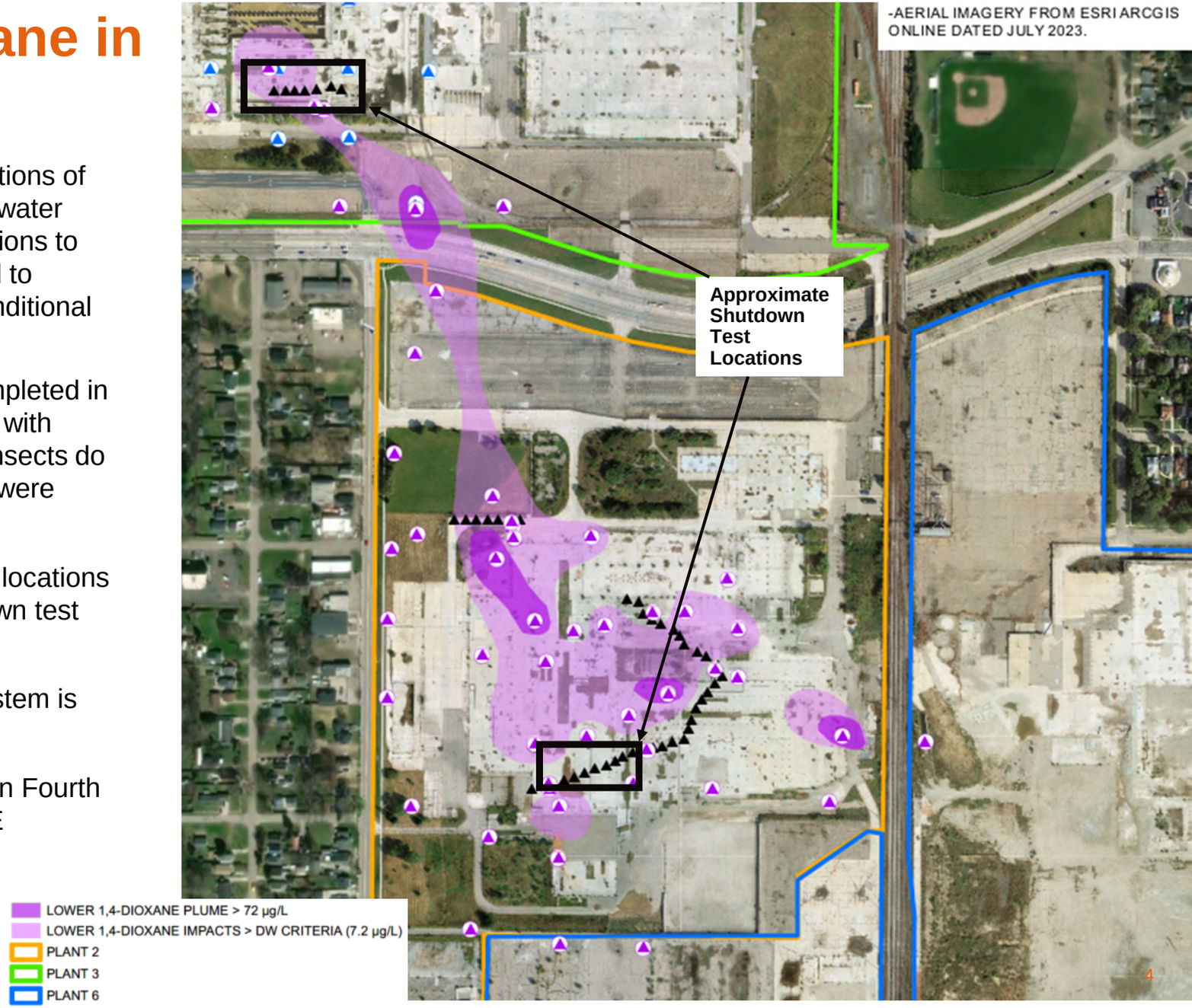
- Remediation at the RACER Lansing Site is being performed through the Resource Conservation and Recovery Act (RCRA) Corrective Action program under the oversight of the Michigan Department of Environment, Great Lakes, and Energy (EGLE). Current activities include focused site characterization and interim remedial actions.
- There is currently no known complete exposure pathways for area residents associated with the site contaminants.
- Characterization of the 1,4-dioxane plume in weathered bedrock at a depth of approximately 60 to 75 feet below the ground surface is complete. Remediation of 1,4-dioxane in the weathered bedrock includes operation of the Plant 2 and Plant 3 biosparge systems (The Plant 3 system began operating in 2019 and the Plant 2 system began operating in 2020). The biosparge system has successfully reduced concentrations of 1,4-dioxane in the weathered bedrock. Short-term system objectives continue to be met.
- Routine groundwater monitoring on and in certain areas adjacent to Plants 2, 3, & 6 in the shallow (perched) zone, weathered bedrock, shallow bedrock, and deep bedrock is ongoing and is anticipated to continue for several years.



Activities completed during this period continued reducing concentrations of 1,4-dioxane in the weathered bedrock and verified no complete exposure pathways for area residents

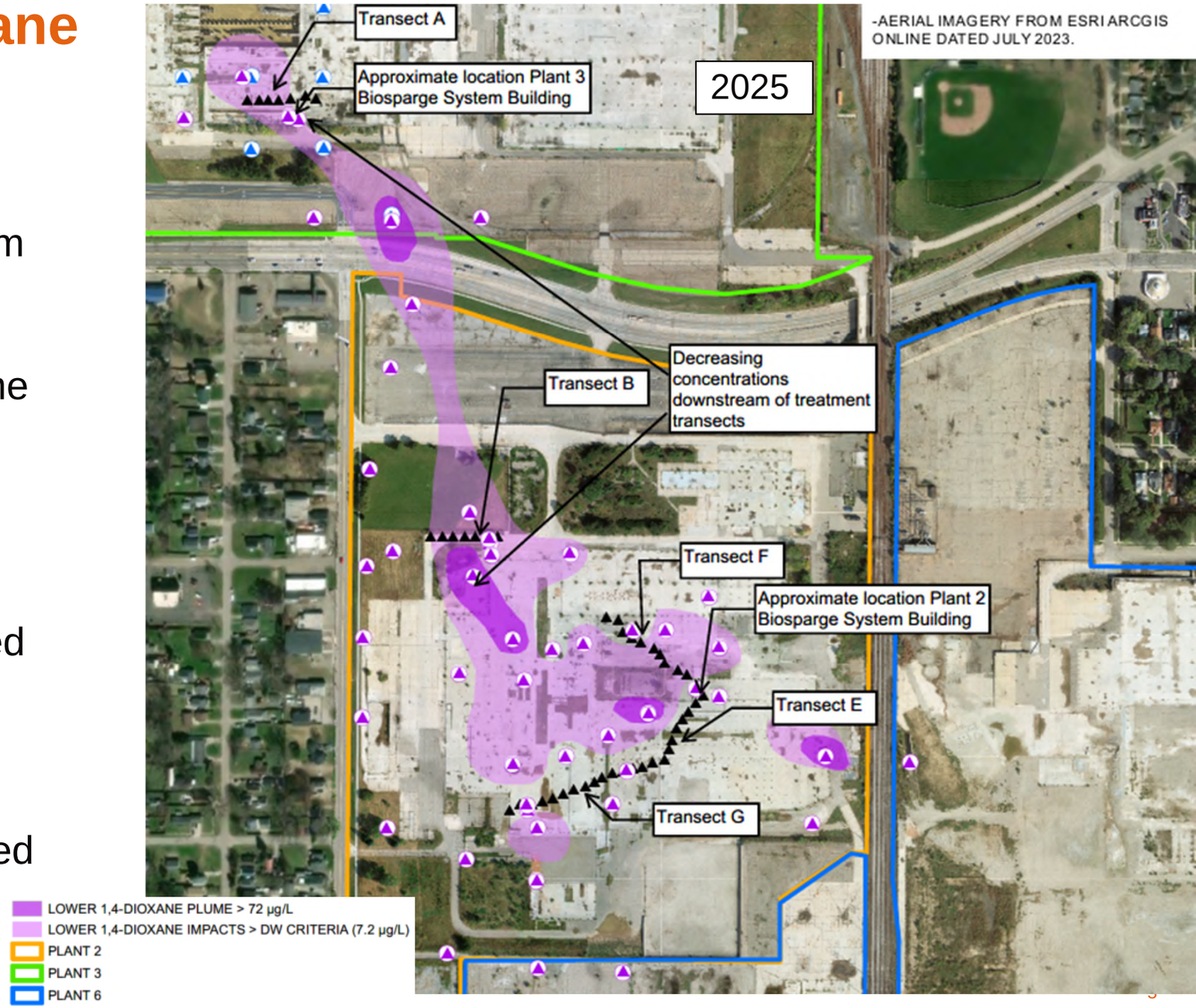
Remediation of 1,4-Dioxane in Weathered Bedrock

- A test was proposed to temporarily shut down portions of the biosparge system to evaluate how the groundwater concentrations respond and to assess if modifications to the operation of the biosparge system are needed to reduce concentrations further. EGLE provided conditional approval on July 21, 2025.
- The second semi-annual sampling event was completed in late October 2025 (Fourth Quarter). As discussed with EGLE and based on the data collected, these transects do not need to be re-started as no increasing trends were observed.
  - Transects A and G will remain off (transect locations identified in figure to the right) and shut down test sampling will occur in First Quarter 2026
  - The remainder of the Plant 2 biosparge system is operating normally
  - Compressor maintenance was completed in Fourth Quarter 2025 in accordance with the EGLE approved shut down test plan



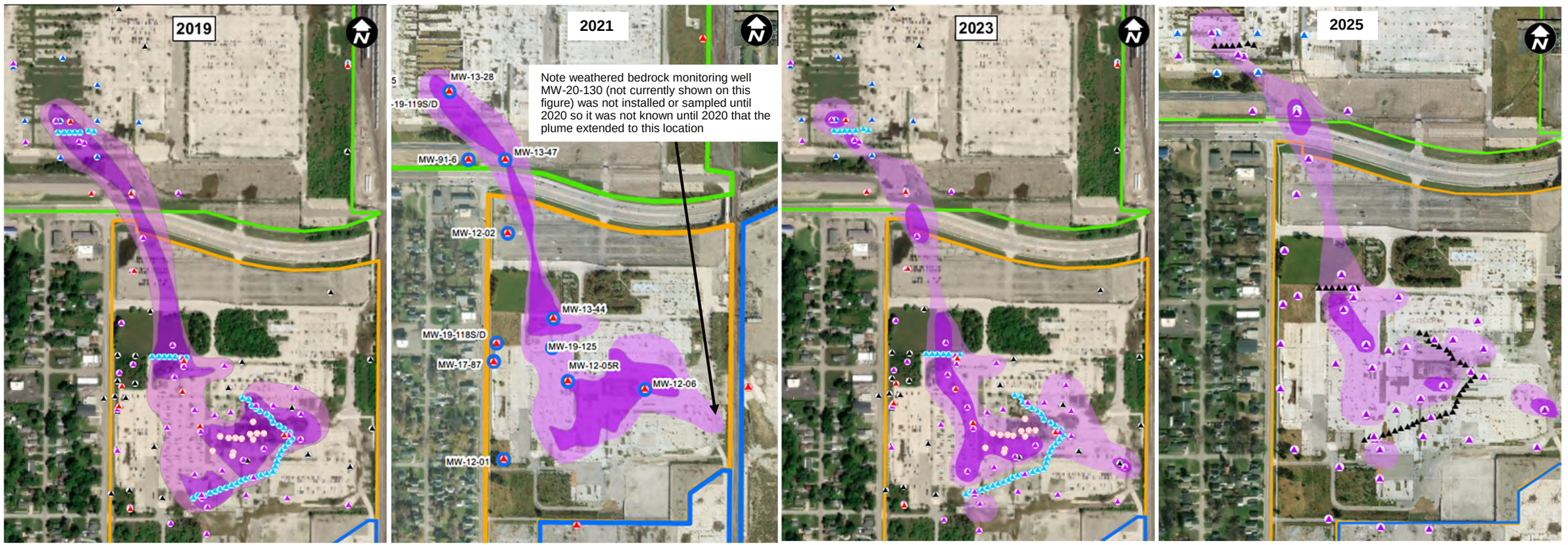
Remediation of 1,4-Dioxane in Weathered Bedrock

- Results of performance monitoring continue to show that the biosparge systems are achieving the short-term objective of reducing 1,4-dioxane concentrations and mass along the core of the weathered bedrock plume
- Annual Biosparge System Report is planned to be submitted to EGLE in Second Quarter 2026 and will be made available on RACER's webpage for this Site once submitted to EGLE
- A request to shut down Transect F and perform follow-up groundwater monitoring is planned to be submitted to EGLE in Second Quarter 2026



Remediation of 1,4-Dioxane in Weathered Bedrock

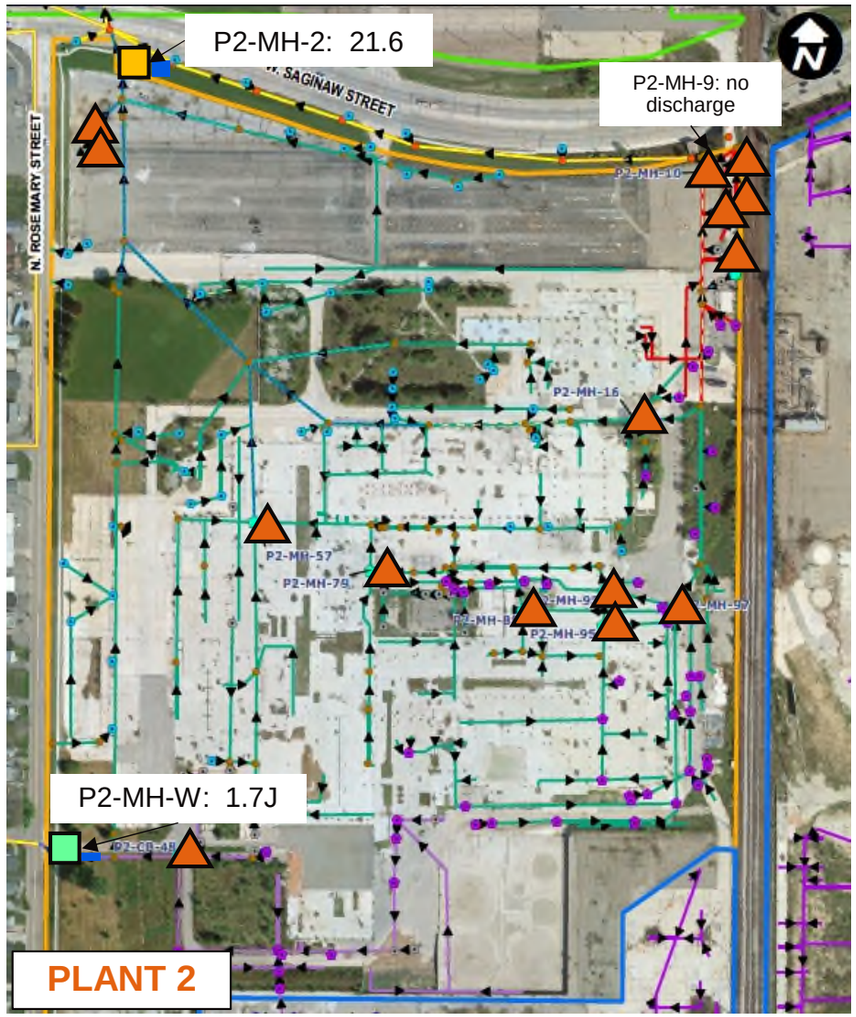
Visual depiction of lower 1,4-dioxane plume (located within the deep overburden and weathered bedrock) distribution in 2019, 2021, 2023 and 2025

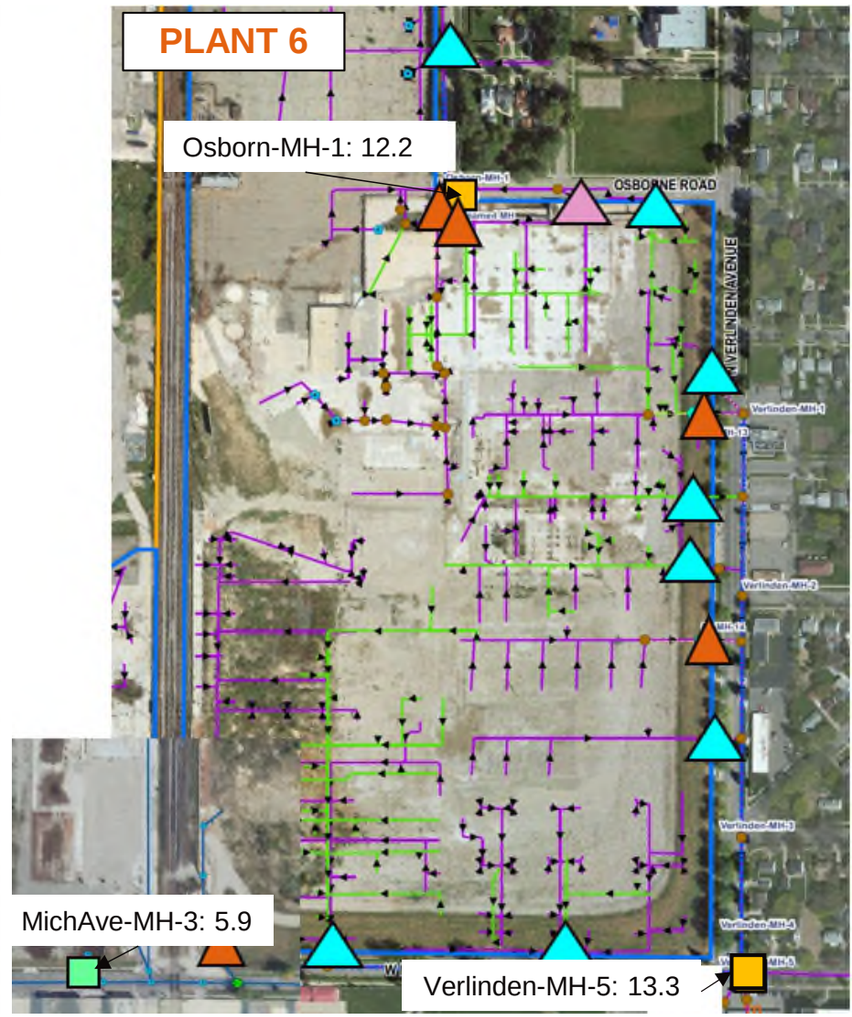


Monitoring PFAS Impacts

Storm Sewer Monitoring:

- Second semi-annual site wide monitoring of storm sewers was conducted in October 2025. Results for Perfluorooctanesulfonic acid (PFOS), the PFAS of concern, are depicted on figures to the right. Results are consistent with previous results and below or slightly above the surface water comparison values.
- Next semi-annual sampling event will be completed Second Quarter 2026. Results will be summarized in the Third Quarter 2026 Quarter Progress Report.





- Does not exceed criteria
- Exceeds PFOS Surface Water criteria (12 ng/L)
- New catch basin installed in Nov 2021
- Manhole filled
- Sewer line cut and capped at curb in 2014

Reports Submitted to EGLE Fourth Quarter 2025

- Submittal of Semi-Annual Groundwater Sampling Report to EGLE on October 15, 2025
- Third Quarter 2025 Progress Report submitted to EGLE on October 29, 2025
- Reports can be viewed or downloaded from the RACER Website for the Lansing Property: https://www.racertrust.org/properties/lansing-plant-2-industrial-land

Work in Progress and Near-Term Milestones Anticipated During the First and Second Quarters of 2026

Activity	Schedule
Remediation of 1,4-Dioxane in the Weathered Bedrock	
Plants 2 and 3 Biosparge System Operation	Ongoing
Biosparge Temporary Shut Down Test Evaluation and Sampling for Transects A and G	Ongoing Quarterly Schedule – First Quarter 2026
Submittal of 2025 Biosparge Annual Performance Report	Second Quarter 2026
Submittal of Request to Shut Down Biosparge Transect F and Perform Follow-up Groundwater Monitoring	Second Quarter 2026
Investigation of 1,4-Dioxane	
None Planned for First Quarter 2026	
Investigation and Remediation of PFAS	
Semi-Annual Storm Sewer Sampling	Second Quarter 2026
Other Investigations, Sampling and Reporting	
2025 Annual Exposure Barrier Inspection Reporting	First Quarter 2026

ARCADIS Design & Consultancy for natural and built assets

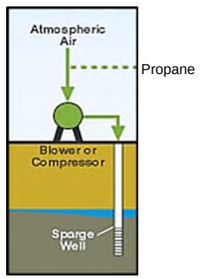
Appendix

BIOSPARGING TREATMENT OF 1,4-DIOXANE

Lansing Industrial Land, Lansing and Lansing Township, Michigan

WHAT IS BIOSPARGING?

- Air and small amounts of propane are injected into the ground through wells
- Promotes biodegradation of chemicals in groundwater, much faster than it would occur naturally
- 1,4-dioxane is treated in the ground, so minimal waste is generated
- Nearby wells are sampled to make sure treatment is occurring

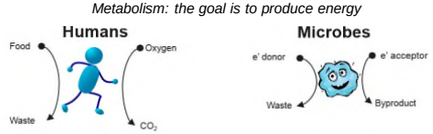


TREATMENT OBJECTIVES

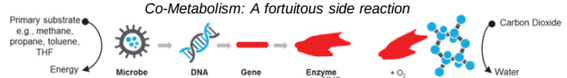
- Reduce onsite concentrations of 1,4-dioxane in the top/weathered zone of the bedrock aquifer
- Prevent off-site migration of 1,4-dioxane

CO-METABOLIC BIODEGRADATION OF 1,4-DIOXANE:

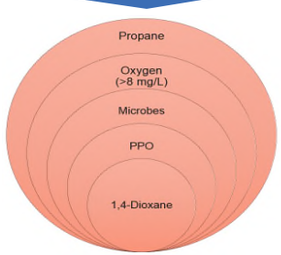
Metabolism: the goal is to produce energy



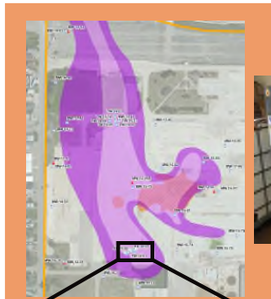
Co-Metabolism: A fortuitous side reaction



Propane + Oxygen + Microbes = 1,4-Dioxane Treatment

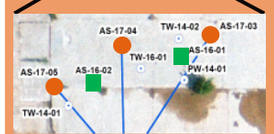


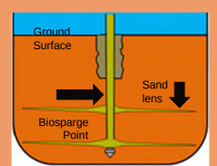
SYSTEM SETUP



Compressor


Biosparge Wellhead



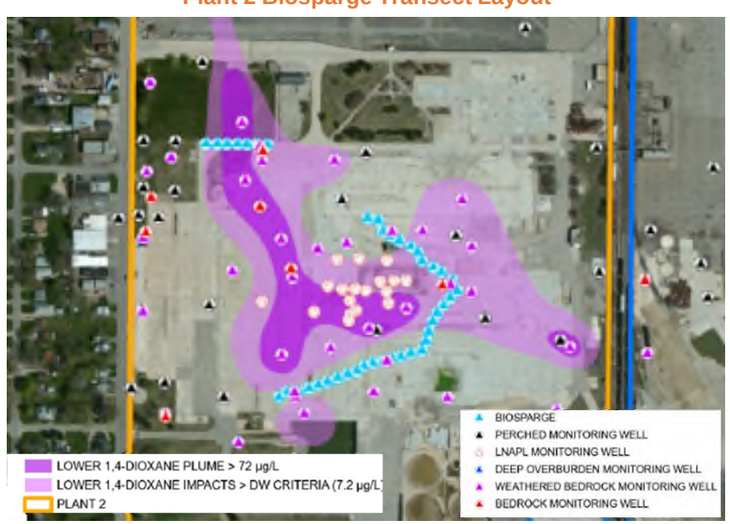


Sand Enhancements


Biosparge Transect With Hoses in Gravel Cover

2016 Pilot Test Biosparge Points
2018 Pre-Design Study Biosparge Points With Sand Enhancements
Weathered Bedrock Monitoring Well

Plant 2 Biosparge Transect Layout



RACER Lansing Biosparge System

- Testing showed that biosparging is a low cost, effective, safe, and sustainable method for treating 1,4-dioxane at the Site and that the installation of sand enhancements improves treatment
- Biosparge system includes 5 treatment transects with 48 sparge wells across Plants 2 and 3
- Biosparge equipment buildings are located on Plant 2 and 3 with nearly 5 miles of hose to convey air/propane from the buildings to the injection wells
- Treated groundwater flows from northwest to southeast as it is cleaned by each treatment transect
- Network of monitoring wells is to track treatment progress
- After 4 to 5 years of operation, the biosparge system has reduced average 1,4-dioxane plume concentrations from a range of 160 - 485 µg/L down to a range of 20 - 50 µg/L and has meet the treatment objectives

Plant 2 Biosparge Building, Propane Tank, Hoses, and Nutrient Injection Tanks