



Applied *Eco*Systems, Inc.
Environmental Management, Consulting & Field Services

Transmitted via E-mail

January 12, 2026

Æ Project No. 11-4317-102

Mr. Tyler Jacobs (Jacobs.Tyler@epa.gov)
Physical Scientist, Corrective Action Section 1
Land, Chemicals and Redevelopment Division, Region 5, U.S. EPA
77 West Jackson Blvd. (LR-16J)
Chicago, IL 60604

RE: Second Half 2025 Progress Report
Performance-Based Administrative Order on Consent
RCRA Corrective Action
Flint West Facility #12990
Flint, Michigan
USEPA ID No. MIK204011722^A

Dear Mr. Jacobs:

In accordance with paragraph 24.b. of the Performance-Based Administrative Order on Consent, Docket No. 05-2011-0021 (AOC), between the U.S. Environmental Protection Agency Region 5 (USEPA) and the Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the second half of 2025 (July 1, 2025 through December 31, 2025).

Please contact me if you would like to discuss this matter further. Thank you.

Sincerely,

Rodney Abke, CPG, LPG
Senior Geologist

A – Note that this facility is identified as USEPA ID No. MID005356654 in the Administrative Order on Consent for this facility. However, the correct USEPA ID No. is MIK204011722.

Attachment A – Second Half 2025 Progress Report

Cc: Shaun Shields, EGLE RRD
Brendan Mullen, RACER
David Favero, RACER
Mike Smith, Applied Ecosystems

ATTACHMENT A
SECOND HALF 2025 PROGRESS REPORT
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN
July 1, 2025 to December 31, 2025

WORK PERFORMED THIS PERIOD

- Prepared the First Half 2025 Progress Report and submitted it to USEPA on July 14, 2025.
- Conducted a routine groundwater monitoring event on September 23, 2025, including gauging monitoring wells for depth to water on September 23, 2025.
- Submitted a response to remarks in an April 4, 2025 email from USEPA and a revised Draft Exposure Pathway Evaluation to USEPA on November 4, 2025.
- Prepared a Data Report summarizing the September 2025 sampling, which was submitted to USEPA on December 29, 2025.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Analyzed the groundwater samples collected from monitoring wells MW-103S, MW-108S, MW-110S, MW-112S, and MW-114S¹ on September 23, 2025 for the following: VOCs, metals (total and dissolved) including arsenic, chromium (total and hexavalent), copper, lead, selenium, zinc, lead, and PFAS. Data was provided to USEPA in the December 29, 2025 Data Report.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTION

No problems were encountered.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- RFI Phase II Sampling Matrix Preparation and Fieldwork Implementation (Proposed 2012 activities) 100%

The 2012 portions of the proposed Phase II investigation included in the June 26, 2012, Phase I Data Report were completed and included the completion and sampling of 13 soil borings, eight of which were finished as monitoring wells. Soil and groundwater samples (from the 8 new and 5 previously installed monitoring wells) were collected and were analyzed for ten MDEQ

¹ A reduction in the number of wells sampled during the semi-annual sampling events was requested in the November 2021 Subsurface Investigation report dated January 27, 2022, submitted to USEPA. The request was approved by USEPA on March 4, 2022.

Metals including Chromium VI, VOCs (USEPA 8260), and PNAs (USEPA 8310).

- RFI Phase II Data Report Preparation 100%
(Submitted February 12, 2013)
- Human Health EI (CA725) Report 100%
(Submitted July 1, 2013)
- Data Report Preparation 100%
(Additional investigations and groundwater monitoring)
(Submitted July 9, 2013)
- Data Report Preparation 100%
(Additional well installation and groundwater monitoring)
(Submitted October 12, 2013)
- Groundwater Migration under Control EI (CA750) 100%
(Submitted March 1, 2014)
- Data Report Preparation 100%
(Groundwater monitoring)
(Submitted March 18, 2014)
- Data Report Preparation 100%
(April 2014 additional investigations and groundwater monitoring)
(Submitted June 23, 2014)
- Data Report Preparation 100%
(June 2014 groundwater monitoring and July 2014 additional soil investigations)
(Submitted October 3, 2014)
- Draft Corrective Measures Proposal 100%
(Submitted November 1, 2014)
- Data Report Preparation 100%
(December 2014 additional soil investigation and groundwater monitoring)
(Submitted February 13, 2015)
- Data Report Preparation 100%
(Groundwater monitoring)
(Submitted August 12, 2015)
- Data Report Preparation 100%
(Groundwater monitoring)
(Submitted February 23, 2016)
- Data Report Preparation 100%

- (Groundwater monitoring)
(Submitted August 3, 2016)
- Draft Work Plan for Hydrogen Release Compound (HRC) Pilot Test Preparation 100%
(Submitted October 7, 2016, addendum submitted to USEPA and MDEQ July 12, 2017)
 - Data Report Preparation 100%
(Groundwater monitoring - October and November 2016)
(Submitted February 21, 2017)
 - Data Report Preparation 100%
(Groundwater monitoring – June 2017)
(Submitted August 11, 2017)
 - Data Report Preparation 100%
(Groundwater monitoring – January 2018)
(Submitted April 11, 2018)
 - Data Report Preparation 100%
(Groundwater monitoring. HRC Pilot Study – May through July 2018)
(Submitted July 27, 2018)
 - Data Report Preparation 100%
(Groundwater Sampling for HRC Pilot Study and routine groundwater monitoring – August to September 2018)
(Submitted October 16, 2018)
 - Data Report Preparation 100%
(October 16/17, 2018 post-HRC injection groundwater sampling)
(Submitted December 12, 2018)
 - Data Report Preparation 100%
(January and February sampling)
(Submitted April 9, 2019)
 - Data Report Preparation 100%
(July sampling)
(Submitted September 4, 2019)
 - Work Plan for Hydrogen Release Compound (HRC) Injection Preparation 100%
(Submitted October 10, 2019)
(Comments received from USEPA November 4, 2019)
 - Preliminary Draft Response to

USEPA November 4, 2019 comment letter (Submitted it to USEPA on January 18, 2020)	100%
• Data Report Preparation (February sampling) (Submitted April 10, 2020)	100%
• Data Report Preparation (August sampling) (Submitted September 29, 2020)	100%
• Per- and Polyfluoroalkyl Substances Subsurface Investigation Work Plan (Submitted to USEPA on October 28, 2020)	100%
• Quality Assurance Project Plan Update (Submitted to USEPA on April 1, 2021)	100%
• Data Report Preparation (March sampling) (Submitted April 23, 2021)	100%
• PFAS Subsurface Investigation Report Preparation (April Investigation) (Submitted September 22, 2021)	100%
• Data Report Preparation (September sampling) (Submitted November 22, 2021)	100%
• PFAS Subsurface Investigation Report Preparation (November 2021 Investigation) (Submitted January 27, 2022)	100%
• Data Report Preparation (March 2022 sampling) (Submitted May 13, 2022)	100%
• Data Report Preparation (September 2022 sampling) (Submitted December 13, 2022)	100%
• Data Report Preparation (March 2023 sampling) (Submitted June 29, 2023)	100%
• Data Report Preparation (September 2023 sampling)	100%

(Submitted February 7, 2024)

- Draft Corrective Measures Study 100%
(Submitted February 27, 2024)
- Data Report Preparation 100%
(March 2024 sampling)
(Submitted May 9, 2024)
- Data Report Preparation 100%
(September 2024 sampling)
(Submitted December 18, 2024)
- Data Report Preparation 100%
(March 2025 sampling)
(Submitted May 18, 2025)
- Exposure Pathway Evaluation 100%
(Revised Draft Evaluation and Response to USEPA Comments Submitted November 4, 2025)
- Data Report Preparation 100%
(September 2025 sampling)
(Submitted December 29, 2025)

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Address any USEPA comments on the revised Exposure Pathway Evaluation.
- Complete groundwater monitoring (routine monitoring event) in March 2026.
- Prepare a Data Report summarizing the results of the March 2026 groundwater sampling in July 2026.
- Review, discuss and respond to any USEPA or EGLE comments on Data Reports and other submittals.
- Provide support to USEPA for its Statement of Basis and Final Decision process.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.