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Our ref: 11208058-LTR-29

23 October 2025

Justin Franks
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Corrective Action Unit
Hazardous Waste Section
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Response to Comments in the EGLE CAMM Inspection Report dated September 25, 2025
RACER Trust Bay City Powertrain Industrial Land; MID 005 356 688;
Waste Data System Number 393420

Dear Mr. Franks

GHD has prepared this letter on behalf of the Revitalizing Auto Communities Environmental Response Trust (RACER) for the Bay City Powertrain Industrial Land (Site or Facility) located in Bay City, Michigan. On July 11, 2025, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) conducted a Corrective Action Monitoring and Maintenance (CAMM) inspection of the Site. The purpose of the CAMM inspection was to confirm that the Facility was in compliance with the long-term monitoring and maintenance requirements specified in the Department of Environmental Quality (now EGLE) approved Operation, Maintenance, and Monitoring Plan (O&M Plan) dated September 23, 2016, under Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the administrative rules promulgated thereunder. EGLE prepared and submitted a CAMM Inspection Report (Report) dated September 25, 2025, which included a list of action items that need to be addressed to maintain compliance with the long-term monitoring and maintenance requirements specified in the O&M Plan. This letter presents RACER's responses to the comments identified in the Report.

This letter is supported by the following:

Figure 1 Groundhog Burrow Locations (October 4, 2025)

Attachment 1 Site Photographs

Attachment 2 May 2025 Monthly Inspection Log

EGLE Letter Comment 1: ***A number of animal burrows were found in the cap. RACER must fill the burrows and remove the occupants.***

Response:

GHD has conducted a Site inspection and identified fifteen animal burrows, as identified on Figure 1. Example photographs of these staked locations are presented in Attachment 1. These locations were marked with stakes and flags on the Site. GHD is in the process of securing the professional services of a wildlife control company to remove groundhogs. The identified contractor for this work is Central Michigan Wildlife Services. Once it is confirmed that a groundhog is captured from a burrow GHD will fill the burrow and take a photograph to document the burrow has been addressed.

GHD will then look for future animal activity during Site inspections and if active animal burrows are observed, GHD will schedule the wildlife control company to come to the Site and remove the animal and GHD will fill in the burrow and photograph the filled burrow.

EGLE Letter Comment 2: ***Several autumn olive (Elaegnus umbellate) were found growing on the edge of the cap, inside the fence barrier. The root structures of these trees grow between one and seven metres underground. RACER must remove the trees. Following the removal the MMD recommends that a round of herbicide is applied to the remnants, as it is common for autumn olive to resprout from the root crown shortly after being cut down.***

Response:

In October 2025, the two trees identified in the EGLE Report were removed. During the next inspection, these areas will be inspected to determine the need for additional actions such as herbicide. Pictures are provided in Attachment 1.

Inspections for woody plants growing on the cap will be completed quarterly in the future and documented on the revised Site inspection form.

EGLE Letter Comment 3: ***Several bare spots on the cap were observed. Recommendations and Follow up Actions: these areas must be reseeded and regraded as necessary to prevent further erosion.***

Response:

RACER and GHD conducted separate Site visits in October 2025 and identified that the bare spots have substantially filled in naturally, and that there are no signs of erosion; therefore no work is proposed for these areas. Pictures are provided in Attachment 1.

EGLE Letter Comment 4: ***There were three unlabelled and uncapped monitoring wells that must be named and secured with adequate locks.***

Response:

Between August and September 2025, GHD replaced/repaired locks, hinges, and labels on MW100S, MW1, and MW2, and on other deficient monitoring wells while completing the annual monitoring event. Pictures are provided in Attachment 1.

EGLE Letter Comment 5: ***The inspection reports lack sufficient detail. Future reports must clearly document how and when issues are resolved.***

a. Woodchuck burrows must be documented, and follow-up maintenance should be accurately reported.

b. The MMD requests that revisions be made to RACER's inspection form to include a column specifying when and what repairs/follow-up actions are needed to address an identified issues, a

column to document when the specified repairs/follow-up actions have been implemented, and a field to specify whether the inspection is a monthly or annual inspection.

c. Documentation of the required monthly inspections do not appear to be present for August 2024 and May 2025. RACER must provide the monthly reports or clarification as to why these reports are missing from the record.

Response:

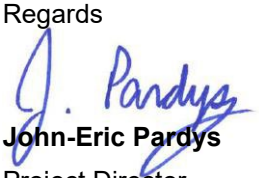
The inspection report template will be revised to meet requirements above. Use of the revised template will commence in Q1 of 2026, however, additional detail as recommended by EGLE will be collected during remaining 2025 inspections.

The May 2025 monthly inspection form is attached to this document in Attachment 2. A full Site inspection was not conducted in August 2024; during this time the groundwater extraction and treatment system was inactive for extensive cleaning and stormwater construction and restoration work were in progress, so an inspection did not seem necessary.

A summary of the target completion and submittal dates is as follows:

Item #	Task	Target Completion / Submittal Date
1	Groundhog removal and burrow filling	November / December 2025, as needed in the future
2	Autumn olive removal	Tree removal completed, observe for regrowth during future inspections
3	Cap bare spot reseeding and regrading	Bare areas appear to have filled in sufficiently.
4	Monitoring well labelling and cap replacement	Completed
5	Inspection report template update	February 2026

Regards



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Corrective Action File

Figure

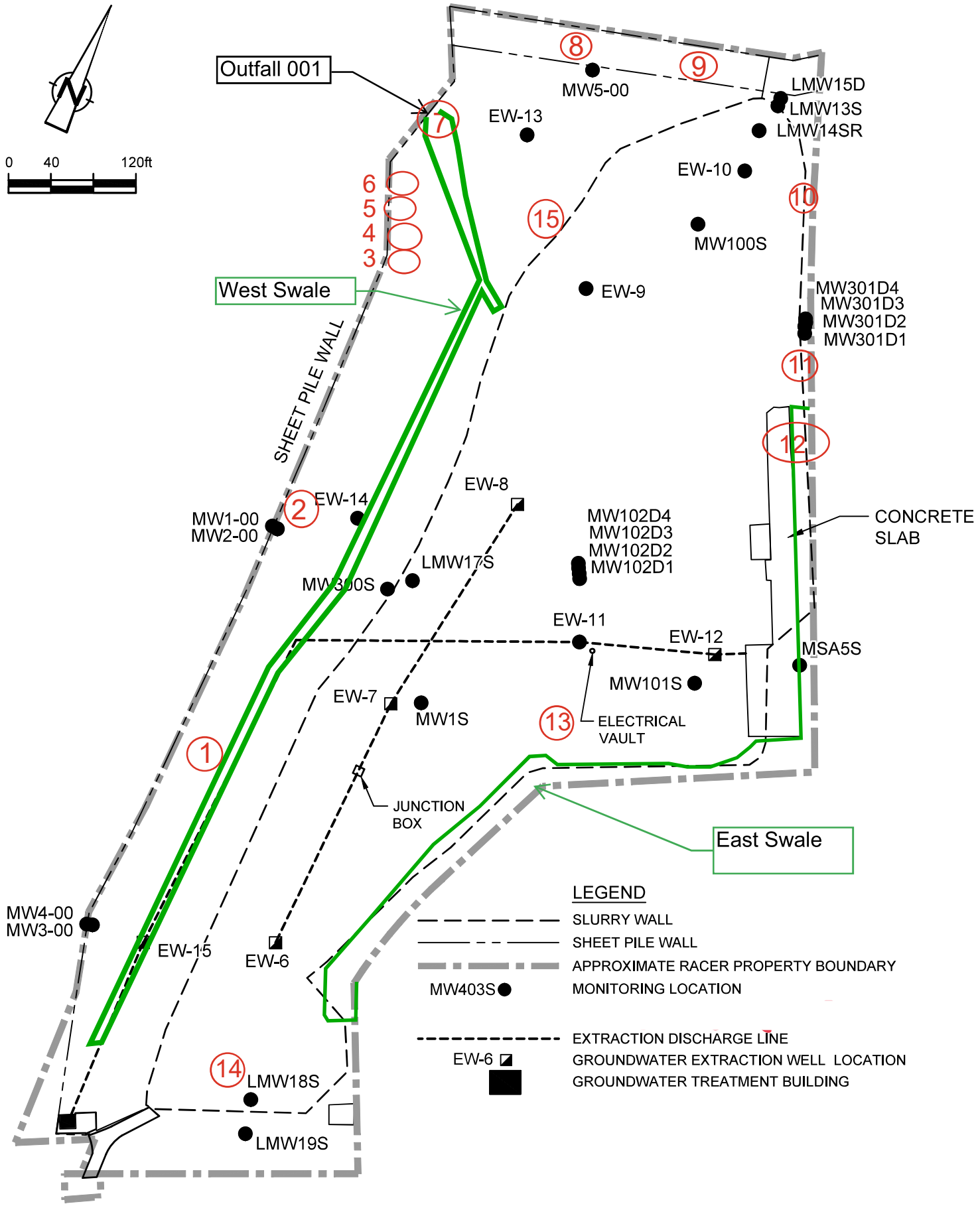

Figure 1
Groundhog Burrow Locations (October 4, 2025)
RACER Bay City

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Attachments

Attachment 1

Site Photographs

1. 2025 EGLE CAMM Inspection Map from Report (EGLE, September 25, 2025).

Site Photographs

2. Left: MW100S unmarked well (EGLE, July 11). Right: Marked well (GHD, Oct 4).

Site Photographs

3. Left and Center: Unlocked and exposed wells MW1 and MW2 (EGLE, July 11). Right: Secured wells MW 1 and MW 2 (GHD, Oct 4).

Site Photographs

4. Left: Groundhog burrow near outfall on cap (EGLE, July 11). Right: Same burrow marked and staked (GHD, Oct 4), to be filled following animal removal.

Site Photographs

5. Additional example of one of the 15 burrows that have been marked and staked (GHD, Oct 4), to be filled following animal removal.

Site Photographs

6. Bare spots filling in and showing no signs of erosion (GHD, Oct 4).

7. Left and Center: Autum Ollive on west side (EGLE, July 11). Right: Same area showing tree removed (RACER, Oct 22).

Site Photographs

8. Left: Autum Ollive on northwest corner (EGLE, July 11). Right: Same area showing tree removed (RACER, Oct 22).

Site Photographs



9. Exposed fencing with potential for animal traversal (EGLE, July 11). These locations will be filled in Spring 2026.

10. Facing northeast toward the MW301 well nest (RACER, Oct 6).

11. Facing southeast toward GM Plant (RACER, Oct 6).

12. Facing northwest toward Outfall and the River (RACER, Oct 6).

13. Facing north toward Outfall and the River (RACER, Oct 6).

Attachment 2

May 2025 Monthly Inspection Log

BAY CITY INDUSTRIAL LAND - MONTHLY SITE INSPECTION		Project: 11208058
On-Site Personnel:	Bmw	Completed Date: 05/27/2025

1. DETAILS OF INSPECTION

☑	Routine Inspection	Completed By:	BMW
☐	Response to Alarm:	Weather:	Sunny
☐	Other task:	Temperature:	68

2. SITE INSPECTION

(Y/N)		If yes indicate nature of maintenance/repairs required
No	Exposure Barrier (signs of trespassing, impairment of SFA pavement)	
No	Multi-layer Cap (evidence of settlement, erosion, disturbance)	
No	Containment System (signs of deterioration of sheet pile, leaking)	
No	Monitoring wells (sign of damage)	
No	Crotty Street Sewer (check level for potential flooding)	
N/A	Permanent Markers (signs of damage/visibility issues)	
No	Storm Water sewer network (signs of debris/silt/damage in CBs and outlets)	

3. GROUNDWATER EXTRACTION SYSTEM

No	Forcemain tubing requires replacement?	
No	Are the EW vaults deteriorating (structure, lids, piping)?	

Monitoring Location	Target Depth (feet)	DTW (feet)	Product? (Y/N)	DTP (ft)	Pump Operating? (Y/N)	What speed?	Heater On? (Y/N)	River Frozen? (Y/N)	Comments (tubing replaced, iron bacteria)
EW-6	12.74	11.5	Yes	11.11	Yes		No	-	Very thick napl
EW-8	11.34	8.82	No		No		No	-	
EW-12	9.42	6.29	Yes	6.29	No		No	-	Residual
EW-15	6.71	4.04	No		Yes		No	-	
EW-7	11				-	-	-	-	
EW-9	11.04	8.58	No		-	-	-	-	
EW-10	10.77	8.9	No		-	-	-	-	
EW-11	14.51	15.99	Yes	12.16	-	-	-	-	Thick napl
EW-13	7.33	4.58	No		-	-	-	-	
EW-14	5.42	2.44			-	-	-	-	
BW-3 (River)	N/A	8.12	-	-	-	-	-	No	

4. GROUNDWATER TREATMENT SYSTEM

	Comments		Comments
☑ Check piping for leaks		☑ check feed pump (calib. every 6-mon)	Date of last calib.:
☑ Check PLC		Flow Reading	0 (gpm)
☑ check sludge pump		Totalized Flow Reading	1,002,404.67 (gal)
☑ check inspection drum		☑ check sludge tank	
☑ check aeration tank		Sludge thickness	(in)
☑ check settling chamber		Flow rate into the Treatment System	(gpm)
☑ check clear well		☑ check bag filters	
☑ check floats in clear well		Pressure reading (PSI) Normal Range (5 to 25 PSI)	BF1: 0 BF2: 0 BF3: 0
☑ check inlet air filter - blower		☑ check GACs for leaks	

☑	check aerator (clean every 6-months)			Pressure reading (PSI) Normal Range (4 to 6 PSI)	GAC1: 0 GAC2: 0
	Pressure reading (PSI) Normal Range (4 to 9 PSI)	A1:	☑	check heater	

5. SURFACE WATER

River	Measured From	DTW (ft)	Frozen? (Y/N)	Comments
BW-3 (River)	Break Wall (RACER)	8.12	No	

6. SAMPLES

	Collect Samples	Sample ID	Time	Duplicate Sample ID	Time
☐	Groundwater Treatment Influent Location: Influent-GWTS (EW-15) Grab Sample: Semi-Annual (June & December)				
☐	Groundwater Treatment Effluent Location: Effluent-GWTS Composite Sample: Semi-Annual (June & December)				

7. **NOTES**