

Mr. Jeremy Pepin
Environmental Engineer
Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division
Hazardous Waste Section
Permitting and Program Support Unit
Constitution Hall, South Tower, 4th Floor, SW Corner
525 W. Allegan Street
P.O. Box 30241
Lansing, Michigan 48909-7741

Arcadis of Michigan, LLC
28550 Cabot Drive
Suite 500
Novi, MI 48377
United States
Phone: 248 994 2240
www.arcadis.com

Date: August 11, 2026

Our Ref: 30275629

Subject: Semi-Annual Progress Report January 1, 2026 – June 30, 2026
Revitalizing Auto Communities Environmental Response Trust
Buick City Site, Flint, Michigan

Dear Mr. Pepin,

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, Arcadis of Michigan, LLC (Arcadis) is submitting this Semi-Annual Progress Report January – June 2026 to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) for the Buick City Site located in Flint, Michigan (the Site) (**Figure 1**). This report is submitted in accordance with the requirements of Section 8.9.3 of the Corrective Action Consent Order (CACO), Materials Management Division (MMD) Order No. 111-02-2020, which became effective on August 5, 2020. Certain activities performed as a requirement of Administrative Consent Order (ACO), Water Resources Division (WRD) ACO-05380, which became effective on April 27, 2025, are included in this report but additional details related to activities performed to comply with the ACO are provided in the annual report prepared specifically for the ACO.

This Semi-Annual Progress Report covers the period of January 1, 2026, through June 30, 2026, and summarizes the work performed, data collected, problems encountered, project schedule, and estimated percent complete for a list of ongoing Site activities. Areas of the Site and specific Site features discussed herein are presented on **Figure 2** (Northend Work Areas) and **Figure 3** (Southend Work Areas). Per discussion with EGLE, a document submittal status tracking has been added to this Report as **Attachment 1** and the tracking table will be updated with each Semi-Annual Report.

Work Performed

The list below provides a summary of the work conducted from January 1, 2026, through June 30, 2026.

Compliance

- In January, February, March, April, May, and June 2026, discharge points along the Flint River were

inspected and boom maintenance was completed (as necessary) for Outfalls 003 and 005 as required by the ACO.

- The PFOS Discharge Point Prioritization Report was submitted to EGLE on January 27, 2026. This report summarized the evaluation completed to prioritize the PFOS impacts associated with the 15 storm sewers servicing the site with Discharge Points (DPs or outfalls) to the Flint River. The report was accepted by EGLE via email on February 12, 2026.
- On February 11, 2026, the July – December 2025 Semi-Annual Report which included as an attachment the Short-Term Construction Monitoring Memo was submitted to EGLE.
- The Interim Corrective Action Plan (ICAP) and Bulkhead Inspection Work Plan (Appendix to ICAP) was submitted to EGLE on February 27, 2026. The interim corrective actions discussed in the ICAP focused on meeting¹ one or both loading reduction goals required by Paragraph 3.9 of the ACO.
- The Bulkhead Inspection Plan (included as Appendix C to the ICAP) was submitted to EGLE for review and approval on February 27, 2026.
- In January and April 2026, select surface cover inspections were conducted.
- Water samples were collected for PFAS analysis from MH-E on March 25, May 14, and June 2, 2026, to verify the upgradient plugs were still in place and reducing PFAS concentrations within the sanitary sewer. The City of Flint collected a split sample during the May 14 and June 2, 2026, sampling events.
- In coordination with the City of Flint, outfalls along the Flint River were inspected and modified on April 1 and May 11, 2026, to allow for channelization and more accurate flow readings for routine outfall sampling events required by the ACO.
- During the week of June 11, 2026, two cameras were installed at Outfalls 003 and 005 to capture high-quality images with the ability to pan, tilt, and zoom, to allow inspections of the outfalls to be conducted remotely moving forward.
- Terradex, an institutional control monitoring service for RACER, provided a change detection monitoring report on January 30, 2026, detailing changes in surface conditions across the site from January 1, 2025, to December 30, 2025. This report is included as **Attachment 2**. Changes detected during this timeframe included:
 - o Excavation/grading;
 - o Visible stockpiling of soil; and,
 - o New construction of buildings
- Please note additional details related to ACO requirements are provided in the Administrative Consent Order (ACO) Annual Status Report submitted to EGLE MiEnviro on July 15 of each year.

Investigation and Sampling

- The monitoring wells on Parcels 4 and 9 (**Figure 2**) were inspected January 12 through January 13, 2026, to confirm if well locations existed and if they could be accessed in the field.
- The RACER Buick City Building 44 Tracer Test memo (summarized activities conducted from late 2021 through 2024) was submitted to EGLE on February 3, 2026, describing the tracer injection test that was used to evaluate groundwater flow in the vicinity of Building 44 area to support better understanding of the PFAS

¹ All meetings referenced in the report were virtual unless explicitly stated otherwise.

distribution in groundwater and mobility in the area. In addition, the tracer injection test was completed to evaluate hydraulic parameters and transport pathways that contribute to the observed PFAS distribution variability in the Building 44 area.

- The Building 44 Pre-Design Investigation Work Plan was submitted to EGLE on October 15, 2025. A revised Pre-Design Investigation Work Plan to incorporate EGLE comments and changed conditions as discussed during monthly update meetings and the Remediation Advisory Team (RAT) meeting was submitted to EGLE on February 20, 2026.
- On February 27, 2026, EGLE provided draft comments on the Groundwater Sampling Plan – Phase 1 Vapor Intrusion Evaluation originally submitted on December 12, 2025. On March 19, 2026, RACER, Arcadis, and EGLE had a meeting to discuss the draft comments, and on March 31, 2026, meeting minutes and presentation slides were provided to EGLE for review and concurrence. EGLE provided additional comments on April 23, 2026, and requested that a revised Work Plan be submitted addressing those comments and other points discussed during the March 19, 2026, meeting. A second meeting was held on May 13, 2026, to discuss the additional comments with EGLE. The revised Sampling Plan – Phase 1 Vapor Intrusion Evaluation was submitted to EGLE on May 18, 2026.
- The Building 44 Well Abandonment Work Plan (originally submitted to EGLE on September 24, 2025) was revised to include EGLE comments provided in the December 4, 2025, *Conditional Approval: Building 44 Area Monitoring Well Abandonment Plan* letter and was resubmitted to EGLE on March 4, 2026.
- The 2025 PFAS Groundwater Monitoring Work Plan (originally submitted to EGLE on October 1, 2025) was revised to include EGLE comments provided in the December 1, 2025, *Conditional Approval: 2025 Groundwater PFAS Sampling Plan* letter and was resubmitted to EGLE on March 5, 2026.
- The 2025 Building 44 Well Abandonment Memo, which summarized the December 2025 Building 44 area well abandonment activities completed on site, was submitted to EGLE on March 20, 2026.
- Surveying was completed on March 30 and 31, 2026, to collect invert elevations at select sanitary and storm sewer manholes. Following the survey, sanitary sewer sampling along James P. Cole was completed at six sanitary manhole locations: MH-AA-2, MH-AA-5, MH-A, MH-A-3, MH-C-4, MH D. Two sanitary manhole locations could not be sampled (MH AA-11-1 and MH AA-11-4) due to no flow. Samples were submitted to the laboratory for PFAS analysis.
- The Monitoring wells in Plumes 2, 5, 6, and 7 (**Figure 4**) were inspected April 13 through April 16, 2026, to assist in finalizing the 2026 PFAS Sampling Plan.
- The 2025 PFAS Groundwater Monitoring Summary Memo was submitted to EGLE on April 14, 2026.
- The 2026 Roadway Monitoring Well Abandonment Work Plan was submitted to EGLE on May 1, 2026. This work plan proposed the abandonment of 21 monitoring wells currently installed within roadways adjacent to the Site (**Figure 5**).
- The 2026 PFAS Sampling Plan was submitted to EGLE on May 20, 2026.
- The Building 44 Area PDI Summary Report was submitted to EGLE on May 27, 2026.
- From June 2nd to June 5, 2026, 17 monitoring wells were redeveloped in preparation for the groundwater sampling event scheduled later in June as part of Phase 1 of the Vapor Intrusion Sampling work plan.
- The PFAS Monitoring Well Groundwater Sampling event was completed June 15 through June 25, 2026, to assess trends in plume concentrations for the five primary PFAS plumes (Plumes 1, 2, 5, 6, and 7) (**Figure 4**) identified across the RACER Buick City site. A total of 110 monitoring wells were sampled for PFAS analysis during this event. Additionally, groundwater samples were collected from 19 monitoring wells for VOC

analysis to provide updated data to evaluate current concentrations for the Phase 1 Vapor Intrusion Investigation. Three of the 19 monitoring wells (RFI-86-15, RFI-86-16R, and MW-04-80(12-17)) were sampled and analyzed for both PFAS and VOC analysis. Seven monitoring wells were either inaccessible or unable to be sampled due to issues identified in the field. Groundwater gauging was completed at 103 PFAS monitoring wells on June 17, 2026.

- Twenty-three waste drums (8 groundwater, 14 soil, one grout) were picked up from the Site on April 16, 2026, and twenty-two waste drums (PFAS-Contaminated Debris, Absorbent Booms, etc.) were picked up from the Site on June 2, 2026, by Crystal Clean of Grand Rapids, Michigan and taken to ESOI Landfill in Oregon, Ohio, a licensed disposal facility. In addition, one 25-yard roll off containing general refuse and debris was picked up on May 5, 2026, by a licensed subcontractor and contents were disposed of at Citizens Disposal Inc. in Grand Blanc, Michigan.

Remedy Design and Implementation

- In accordance with the Building 44 PDI Work Plan, one groundwater sample associated with the RSSCT activities completed in December 2025 was collected from the bulk water drum by Xylem on January 20, 2026, and submitted to ALS laboratory for analysis. This sample consisted of groundwater combined from four locations on Site (MW-04-151(15-20), MW-04-151(4-9), SB-04-49(13-18), and SB-04-46(4-9)) to mimic influent concentrations to the trench collection system that is being designed.
 - In January 2026 the RSSCT was completed by Xylem in accordance with the PDI work plan
 - Upon completion of the RSSCT, One, 30-gallon drum a was picked up on April 24, 2026, from Xylem, located in Bellefonte, PA, and shipped to Crystal-Clean of Grand Rapids, Michigan for disposal.
 - The Building 44 Area PDI Summary Report, which summarizes the above activities, was submitted to EGLE on May 27, 2026.
- Continued preparation of Declaration to Restrictive Covenants (DRCs) for Parcels 4, 9, and 12-B. A Draft DRC was submitted to EGLE for review on April 21, 2026 for Parcel 12B (**Figure 3**) and on May 19, 2026 for Parcels 4 and 9 (**Figure 2**). A meeting was held to discuss the DRCs with EGLE on June 16, 2026.
- Confined space entry to re-inflate the temporary plugs present in MH-H-1A and MH-E-1 was completed on May 5 and May 6, 2026. Subsequent sampling at Manhole MH-E to check concentrations of PFAS after plug re-inflation was completed on May 14, 2026.
- Buick City 761.61(c) Request for Risk-Based Cleanup Approval was submitted to USEPA and copied to EGLE on June 17, 2026.
- The interim measures work plan, including design, for the Hamilton Ave Source Area Remedy to address Outfalls 010, 011, 013 was advanced January through June of 2026.
- An email was sent to EGLE and the City of Flint on June 26, 2026, detailing the scope of work for the inspection of Outfall 002 manhole MH-18 and associated piping, as proposed in the ICAP.
- Two monitoring wells (RFI-94-09 and RFI-94-10) (**Figure 5**) were sampled and analyzed for PFAS and VOCs in June 2026, to support the implementation of the Comprehensive Corrective Action Plan (CCAP), due to EGLE in February 2027.

Regularly Scheduled Monthly Progress Meetings

- EGLE regularly scheduled monthly update meetings were held on the following days –

- o January 14, 2026 – Discussion included: review of the James P. Cole sewer upgradient sampling results, PFAS groundwater sampling update, discussion about the outfall flow collection event, the RSSCT water collection from December 2025, Work Plan and Field Work Status Update, and LNAPL Gauging in MW-84-73 Area.
- o February 11, 2026 – Discussion included: PFAS Groundwater Sampling Update, Building 44 Trench Design Update, Hamilton Ave Remedy 2026 Schedule, and an ICAP Update.
- o March 11, 2026 – Discussion included: a RSSCT Update, Hamilton Ave Remedy 2026 Schedule, ACO Camera Use for Inspections, and the Lagoon Completion Report Overview.
- o April 8, 2026 – Discussion included: Building 44 Area Trench Update, Hamilton Ave Remedy 2026 Schedule, and the PFAS Groundwater Monitoring Plan.
- o May 13, 2026 – Discussion included: A Hamilton Ave Remedy Update, Sanitary Sewer Update, Vapor Intrusion Phase I Work Plan, PFAS Groundwater Monitoring Plan, and the Roadway Well Abandonment Plan.
- o June 10, 2026 – Discussion included: ACO Outfall Inspection Cameras, Hamilton Ave Soil Source Area Evaluation, Hamilton Ave GW Remedy Update and Schedule, Sanitary Sewer Update, STCM Sampling Update, and upcoming Field Work Schedule.

Redevelopment

- The first and second quarter, Short Term Construction Monitoring (STCM) sampling events were completed March 18 through March 25, 2026, and June 29 and 30, 2026, and consisted of collecting groundwater samples from six monitoring wells, one manhole, and two storm sewer structures per event. The March and June 2026 STCM Sampling Event Update memo will be provided under separate cover.

Data Collected

The samples collected as part of Site investigation or monitoring activities during this reporting period are presented below.

Groundwater Samples

Groundwater samples were collected at the Site as part of various investigation and/or monitoring activities as follows. QA/QC samples are included in counts. Results are or will be summarized in separate reports.

Month	Sampling Area	Number of Samples	Number of Locations	Analytes
January	Hamilton Ave. Groundwater Remedy Design & RSSCT	1	Composite sample of 4 Monitoring Well locations	Dissolved Organic Carbon, TSS, SVOC, VOC, Total and Dissolved Metals, TOC, Oil & Grease, Carbonate Hardness, Calcium Carbonate, TDS, Anions (Bromide, Chloride, Fluoride, Sulfate), Alkalinity (Bicarbonate, Carbonate, Hydroxide, Phenolphthalein), Dissolved Silica, PFAS
March	STCM	8	6	Project Analyte List (PAL) metals (dissolved and total), VOCs, SVOCs, PFAS

Month	Sampling Area	Number of Samples	Number of Locations	Analytes
June	Hamilton Ave. Groundwater Remedy Design & Discharge	1	Composite sample of 4 Monitoring Well locations	BOD5, Oil & Grease/Hexane-extractable Material, Ammonia-Nitrogen, Available Cyanide, Total Nickel, Total PCB, Total iron, Dissolved iron, Nitrate, Nitrite, Phosphate, Total Hardness, Hardness as CaCO ₃ , Metals, Mercury, Dissolved Metals (lab filtered), Alkalinity - Bicarbonate, Alkalinity – Carbonate, Hydroxide Alkalinity, Phenolphthalein Alkalinity (calculation), Anions (Bromide, Chloride, Fluoride, Sulfate), Total Dissolved Solids (TDS), Dissolved Silica, Total Suspended Solids (TSS)
June	Plumes 1, 2, 5, 6, and 7	136	110	PFAS
June	Plumes 1, 2, 5, 6, and 7	23	19	VOCs
June	Near Outfall 007	2	2	PFAS and VOCs
June	STCM	8	6	Project Analyte List (PAL) metals (dissolved and total), VOCs, SVOCs, PFAS

Storm and Sanitary Sewer Water Samples

Samples were collected from multiple storm/sanitary sewers and analyzed as part of various investigation and/or monitoring activities at the Site, as follows. QA/QC samples were included in counts:

Month	Storm Sewer Sample Location	Number of Samples	Analytes
March	Outfall 005 West and East P-traps	2	PAL metals (dissolved and total), VOCs, SVOCs, PFAS
March	MH 3-9	1	Low Level Mercury, PCBs, PAL VOCs, PAL SVOCs, PAL Metals (dissolved and total), PFAS
March	MH-D, MH-C-4, MH-A-3, MH-A, MH-AA-5, MH-AA-2	6	PFAS
March	MH E	1	PFAS
May	MH E	1	PFAS
June	MH E	1	PFAS
June	Outfall 005 West and East P-traps	2	PAL metals (dissolved and total), VOCs, SVOCs, PFAS
June	MH 3-9	1	Low Level Mercury, PCBs, PAL VOCs, PAL SVOCs, PAL Metals (dissolved and total), PFAS

Problems Encountered

In February 2026, field staff observed damage to the gate that provides access into the Site, near Stewart Avenue. The gate is owned by Ashley Capital, so they facilitated the repair.

Early morning on June 25, 2026, a diesel spill occurred on the Spen-Tec property currently being used for vehicle parking by Excel. According to information obtained from Excel, approximately 75 gallons of diesel fuel was spilled from a ruptured truck fuel tank, and of this quantity an estimated 30-50 gallons went into the outfall 005 storm sewer manholes. The spill was unrelated to any RACER activities. EGLE was notified by Excel and Arcadis staff and Michigan Spill Response was dispatched by Excel. In response, Michigan Spill Response vacuumed out the manholes with a vac truck, installed additional absorbent booms at outfall 005, and vacuumed the surface inside the boom containment area at outfall 005. It was noted that the booms already in place caught the spill and nothing was released into the river beyond the booms. It is our understanding that Michigan Spill Response, on behalf of Excel, continued to vacuum out the boom area once a week for the following few weeks to monitor the outfall boom area.

During the June PFAS groundwater sampling event, June 15 through 25, 2026, seven shallow monitoring wells were either inaccessible or unable to be sampled due to issues identified in the field.

Project Schedule

Near-Term Milestone Activities Anticipated During the Next Semi-Annual Period

Proposed Site work for the third and fourth quarters of 2026 include the following activities:

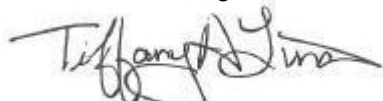
- Submit this Semi-Annual Report to EGLE
- Submit summary of STCM sampling events and results from March-June 2026
- Review scope of work to collect data in support of preparing the CCAP with EGLE (completed during July 29 meeting) and revise the scope to address EGLE comments made during the meeting. During the meeting EGLE indicated that there was no formal approval of the scope required so the work will be scheduled.
- Continue with flow measurement evaluation at outfalls and will complete additional sampling at storm sewer manholes and outfalls during a dry event for data collection to be utilized in preparing the CCAP
- Submit Building 44/Hamilton Ave Interim Measures Work Plan (submitted July 20, 2026)
- Complete Monitoring Well Abandonments within James P. Cole Boulevard, East Hamilton Ave, and Stewart Ave (scheduled for July 28 through August 4)
- Complete Outfall 002 Inspection (completed July)
- Submit Lagoon Summary Report
- Submit James P. Cole Sanitary Sewer Sampling Summary Memo
- Complete Manhole E sampling in July and plug check in August
- Complete sanitary sewer vapor sampling as part of the Vapor Intrusion Work Plan – Phase I
- Submit 2026 PFAS Groundwater Sampling Summary Report

Mr. Jeremy Pepin
EGLE
August 11, 2026

- Submit Summary of Phase I Vapor Intrusion Sampling and propose Phase II Vapor Intrusion Work Plan based on data gathered during Phase I activities
- Submit ACO Annual Status Report – Due July 15, 2026 (completed)
- Submittal of CCAP per ACO to EGLE – Due February 28, 2027
- Continue inspections of Outfalls 003 and 005 in accordance with ACO
- Address comments from, continue discussions with EGLE, and revise and resubmit all DRCs for Parcels 4, 9, and 12B as necessary
- Continue with monthly project update meetings with EGLE
- Other meetings with EGLE as determined necessary

Should you have any questions on the information provided within this progress report, please feel free to contact Brendan Mullen with RACER Trust at bmullen@racertrust.org 201-247-4890 or me at the below referenced contact information.

Sincerely,
Arcadis of Michigan, LLC



Tiffany A. Linder
Certified Project Manager

Email: tiffany.linder@arcadis.com
Direct Line: 810 225 1928

CC. Brendan Mullen, RACER Trust
Evin Maguire, EGLE
Shaun Shields, EGLE

Enclosures:

Figure 1 – Site Location Map

Figure 2 – Work Areas North End

Figure 3 – Work Areas South End

Figure 4 – Site-Wide PFAS Plumes

Figure 5 – Monitoring Wells in Roadways to Abandon

Attachment 1 – RACER Buick City – Document Tracking

Attachment 2 – Terradex Delivery Report – Change Detection Analysis

Figures



0 2000' 4000'



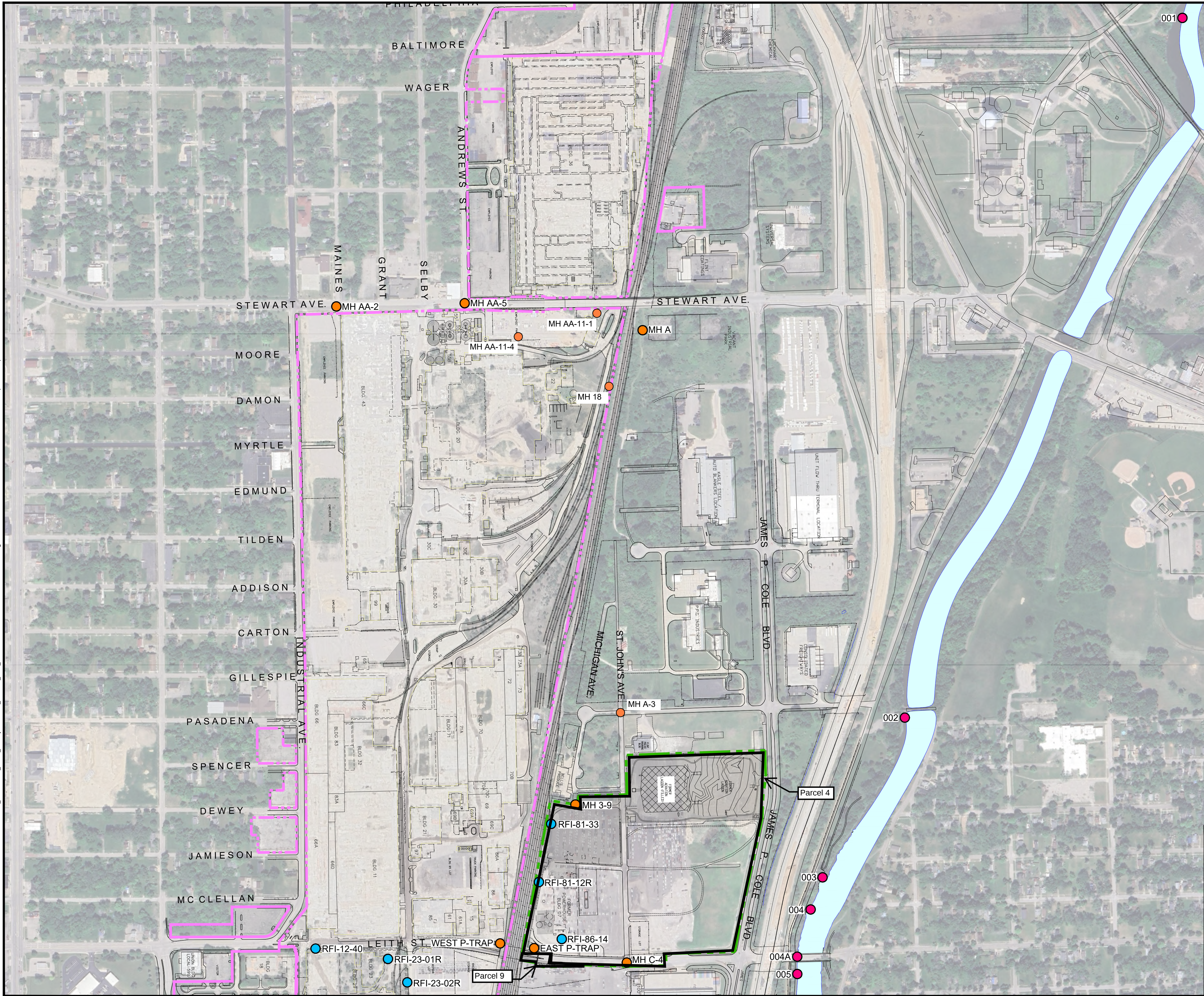
APPROXIMATE SCALE IN FEET

RACER TRUST
BUICK CITY
FLINT, MICHIGAN

SITE LOCATION MAP

FIGURE
1

C:\Users\BSS\small\DC\ACCD\ba\Arcadis ACC US\AUS\989999999-RACER-BUICK CITY_FLINT_MI\Project Files\10_WIP\101_ARC_ENV\2026\10-10\G\SEWER WORK AREAS.dwg LAYOUT: 1 SAVED: 1/15/2026 9:32 AM ACADVER: 24.2S (LMS TECH) PAGES: 1 PLOTSTYLETABLE: ---- PLOTTED: 1/15/2026 9:57 AM BY: SMALL BRIAN



LEGEND:

- CURRENT RACER-OWNED PROPERTIES
- FORMERLY OWNED RACER PROPERTIES
- MONITORING WELL
- SEWER STRUCTURE
- OUTFALL LOCATION

NOTES:

1. RACER = REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE
2. RCRA = RESOURCE CONSERVATION AND RECOVERY ACT
3. RFI = RCRA FACILITY INVESTIGATION MONITORING WELL
4. R = REPLACEMENT MONITORING WELL

SOURCE:

AERIAL PHOTOGRAPH FROM
GOOGLE EARTH - MAY 23, 2024.

RACER TRUST
BUICK CITY
FLINT, MICHIGAN

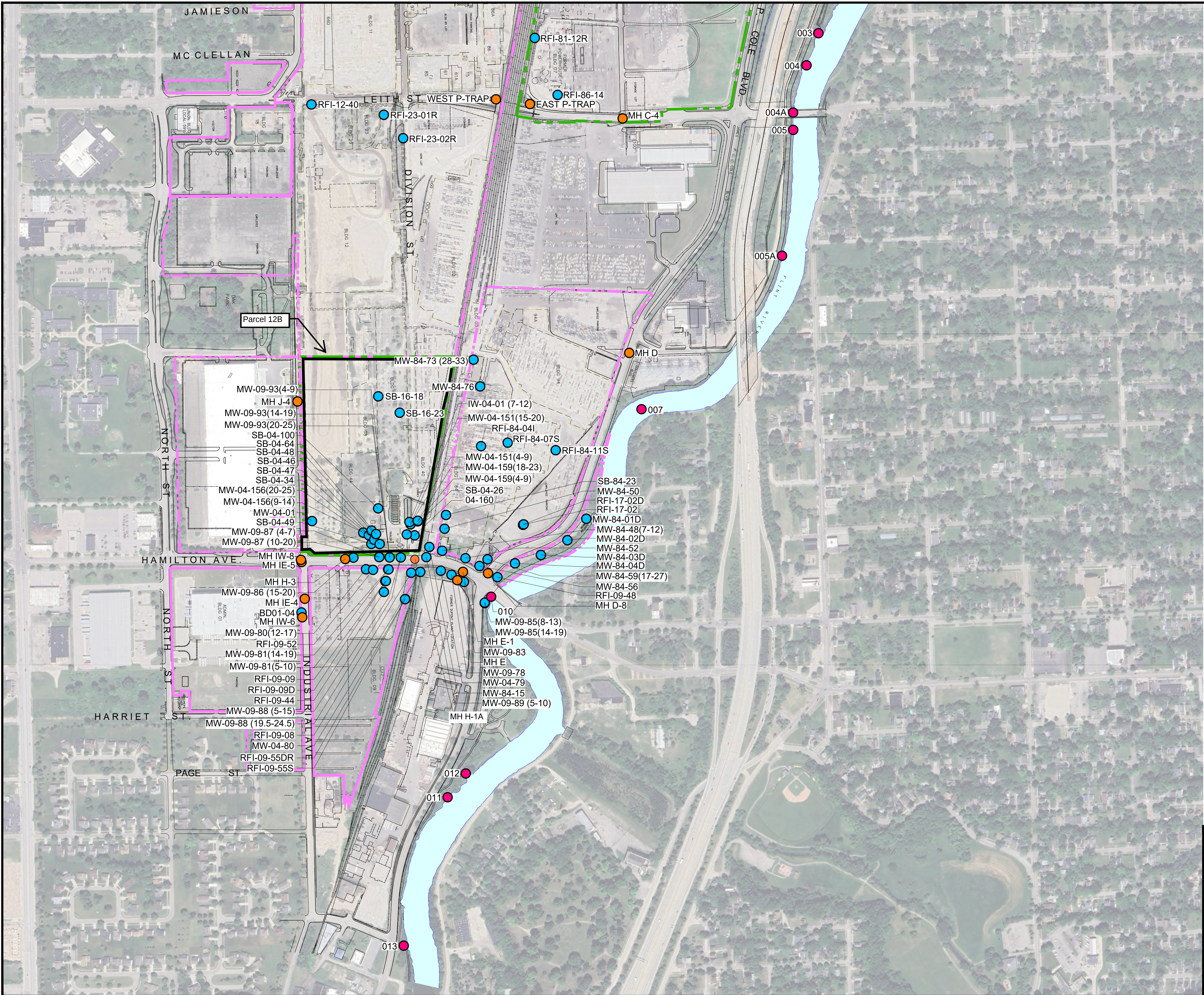
WORK AREAS
NORTH END



FIGURE

2

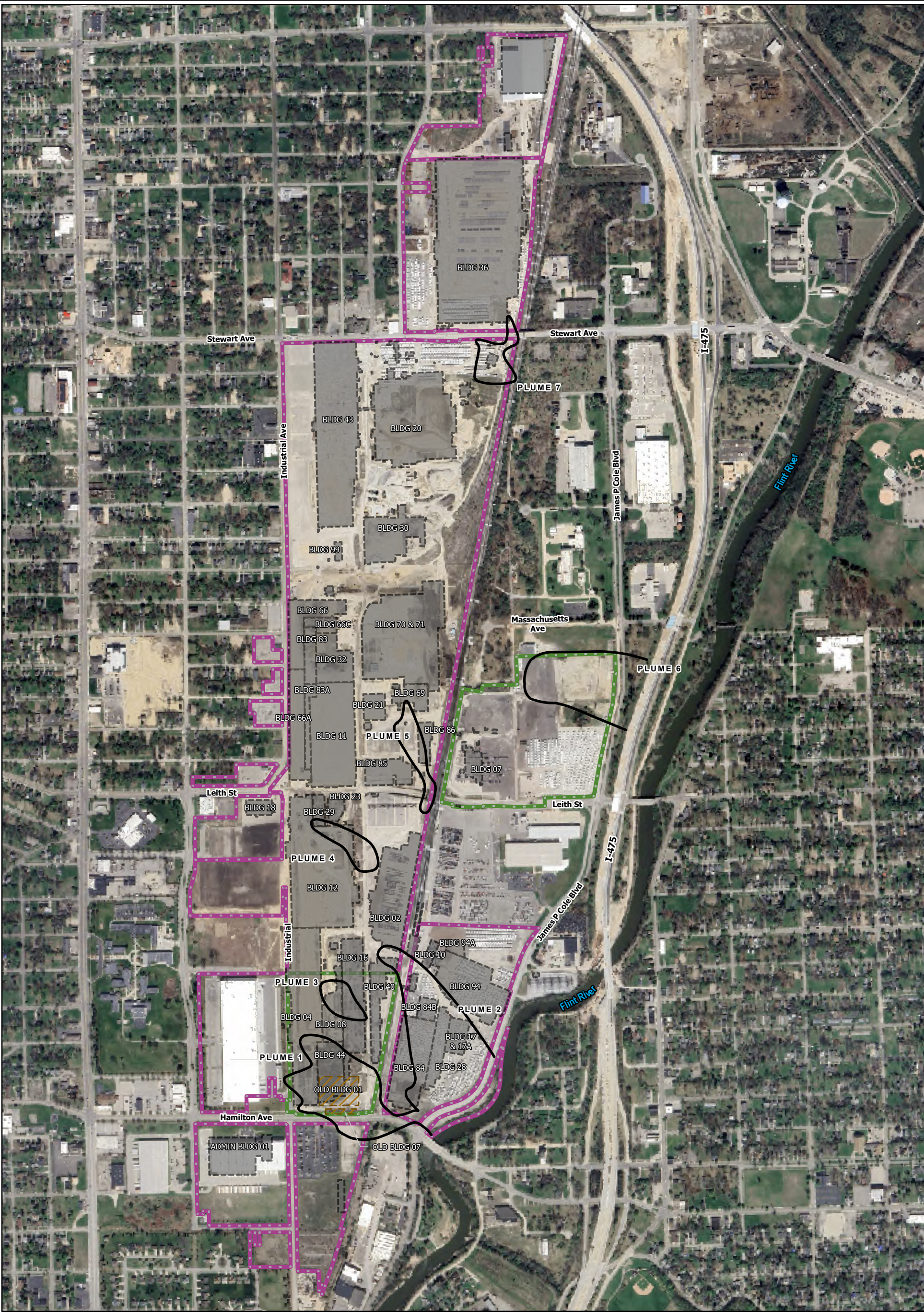
C:\Users\BSS\smallDC\ACCDocs\Arcadis ACC US\AUS-9899999-RACER BUICK CITY_FLINT_MI\Project Files\10_WIP\101_ARC_ENV\2026\01-DWG\SEWER WORK AREAS.dwg LAYOUT: 2 SAVED: 1/15/2026 9:32 AM ACADVER: 24.2S (LMS TECH) PAGES: 2 PLOTSTYLETABLE: ---- PLOTTED: 1/15/2026 9:57 AM BY: SMALL BRIAN



RACER TRUST
BUICK CITY
FLINT, MICHIGAN

**WORK AREAS
SOUTH END**





LEGEND

- Interpreted Groundwater Plume for any PFAS > 10x SL
- Former Building Footprints
- Former Building Footprints (Older Buildings)
- Current RACER-owned Properties
- Former RACER-owned Properties

Note:
Aerial source: Google Earth, dated April 2025.

Acronyms:
PFAS = Per- and Polyfluoroalkyl Substances
SL = Screening Level, based on Michigan Part 201 Groundwater-Surface Water Interface Criteria
x = times
> = greater than

N

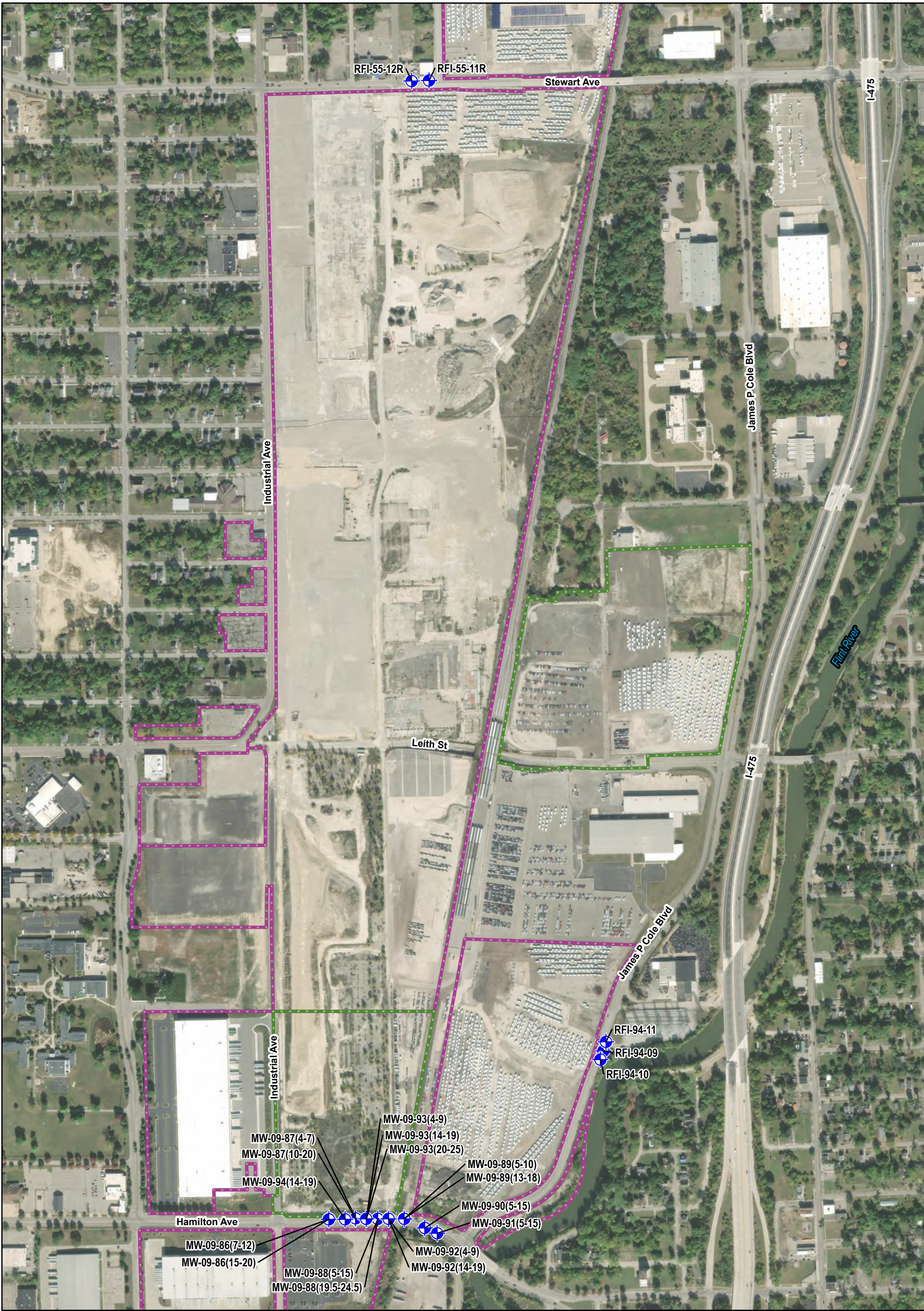
0 500 1,000
GRAPHIC SCALE IN FEET

RACER TRUST
BUICK CITY, FLINT, MI
2026 PFAS GROUNDWATER SAMPLING WORK PLAN

SITE-WIDE PFAS PLUMES

ARCADIS

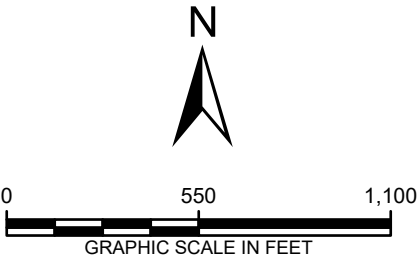
FIGURE
4



LEGEND

- Monitoring Well Proposed for Abandonment
- Current RACER-owned Properties
- Former RACER-owned Properties

Note:
1. Aerial source: ESRI, dated October 2025.



RACER TRUST BUICK CITY, FLINT, MI	
MONITORING WELLS IN ROADWAYS TO ABANDON	
	FIGURE 5

Attachment 1

RACER Buick City – Document Tracking

Attachment 1



SUBJECT

Buick City Document Status Tracking

DATE

Last update June 30, 2026

NOTES: EGLE – Michigan Department of Environment, Great Lakes and Energy

USEPA – United States Environmental Protection Agency

Monthly Site Update Meetings are also held with EGLE to discuss project status items

Document Submitted to EGLE Unless Otherwise Noted	Submittal, Comments and Approval Details
Buick City 761.61 (C) Request for Risk-Based Cleanup Approval (USEPA)	4/11/22 – initial submittal to USEPA 5/23/23 – Revised report submitted to USEPA 6/12/23 – call with USEPA 9/14/23 – call with USEPA - September 2023 – comments provided by USEPA 10/18/23 – Revised report submitted to USEPA 3/14/24 – call with USEPA 4/16/24 – Revised report submitted to USEPA 4/17/24 – call with USEPA 6/5/24 – comments provided by USEPA 6/16/26 – Revised report submitted to USEPA
Stormwater Treatment Evaluation Work Plan	2/14/25 – submitted to EGLE - Approved in March via email transmittal
Industrial Avenue Sanitary Sewer Sampling Work Plan	2/20/25 – submitted to EGLE - Approved in March via email transmittal
January-June 2025 Semi-Annual Report and STCM Summary Memo	7/30/25 – submitted to EGLE
Bulkhead Inspection Work Plan Presentation and Bulkhead Inspection Work Plan (Included in Appendix to ICAP for ACO)	9/23/25 – presented and submitted presentation to EGLE 2/27/26 – work plan submitted to EGLE as appendix to ICAP
Building 44 Monitoring Well Abandonment Plan	9/24/25 – submitted to EGLE 11/17/25 – response to comments during monthly site update meeting provided to EGLE via email transmittal 12/4/25 – EGLE conditional approval via emailed letter 3/4/26 – revised plan submitted to EGLE to address conditions in approval letter
2025 Groundwater PFAS Sampling Plan	10/1/25 – submitted to EGLE 11/7/25 – comments provided by EGLE via email - November 2025 – response to comments provided to EGLE on additional wells to sample 12/1/25 – EGLE conditional approval via emailed letter 3/5/26 – revised plan submitted to EGLE to address conditions in approval letter

Attachment 1 – Buick City Report Status Tracking
Last Update June 20, 2026

Document Submitted to EGLE Unless Otherwise Noted	Submittal, Comments and Approval Details
James P. Cole Boulevard and Upgradient Sanitary Sewer Sampling Plan	10/1/25 – submitted to EGLE 11/12/25 – EGLE approval via emailed letter
Industrial Avenue Sanitary Sewer Video Inspection Work Plan	10/8/25 – submitted to EGLE 10/10/25 – comments provided by EGLE via email transmittal 10/13/25 – response to comments provided via email transmittal 11/13/25 – EGLE approval via emailed letter
Building 44 Pre-Design Investigation Work Plan	10/15/25 – submitted to EGLE - December 2025 – Email communications – RAT comments received via email 11/17/25 – concurrence via email communications – no formal letter approval received from EGLE 2/20/26 – revised report submitted with comments and changed conditions addressed
Groundwater Sampling Vapor Intrusion Work Plan – Phase I	12/12/25 – submitted to EGLE 2/27/26 – comments provided by EGLE via email transmittal 3/19/26 – virtual discussion held to discuss EGLE comments 3/31/26 – response to comments and meeting minutes provided to EGLE 4/23/26 – additional comments provided by EGLE via email transmittal 5/13/26 – additional virtual discussion held to discuss EGLE comments 5/19/26 – report re-submitted with comments addressed Awaiting formal EGLE approval – verbal approval provided to proceed with groundwater sampling portion of work plan
PFOS Discharge Point Prioritization Report (WRD ACO Related Report)	1/27/26 – submitted to EGLE via MiEnviro Site 2/12/26 – accepted by EGLE WRD via email transmittal
Tracer Study Summary Report	2/3/26 – submitted to EGLE
July-December 2025 Semi-Annual Report and STCM Summary Memo	2/11/26 – submitted to EGLE
Interim Corrective Action Plan (ICAP) and Bulkhead Inspection Work Plan (Appendix to ICAP) (WRD ACO Related Report)	2/27/26 – submitted to EGLE via MiEnviro Site
Building 44 Monitoring Well Abandonment Summary Memo	3/20/26 – submitted to EGLE
2025 PFAS Groundwater Monitoring Summary Memo	4/14/26 – submitted to EGLE
2026 Roadway Monitoring Well Abandonment Work Plan	5/1/26 – submitted to EGLE 7/8/26 – Verbal approval provided during monthly EGLE meeting

Attachment 1 – Buick City Report Status Tracking
Last Update June 20, 2026

Document Submitted to EGLE Unless Otherwise Noted	Submittal, Comments and Approval Details
2026 PFAS Sampling Plan	• 5/20/26 – submitted to EGLE • Awaiting formal EGLE approval – verbal approval provided to proceed with sampling plan
Building 44 Pre-Design Investigation Summary Report	• 5/27/26 – submitted to EGLE

Attachment 2

Terradex Delivery Report – Change Detection Analysis



Delivery Report

Change Detection Analysis

Buick City - Volume 6

January 1, 2025 – December 31, 2025



Buick City

Introduction



Area of interest	Buick City (1.98 km2)
Change period	January 01 2025 - December 31 2025
Change detection scope	Evidence of: • excavation / grading in AOI • visible stockpiling of soil • new construction of buildings
Delivery Report Date	January 30, 2026

Table of Contents

<u>Inventory of Images</u>	4
<u>Methodology and Analyst Commentary</u>	5
<u>Vegetation Indices Explained</u>	6
<u>High Resolution Time Series</u>	7
<u>Low Resolution Time Series</u>	11
<u>AOI Sectors</u>	12
<u>Change Detection Summary</u>	13
<u>Item 1 - Soil Stockpiling / Excavation</u>	14
<u>Item 2 - Increased usage for storage</u>	15
<u>Item 3 - New items present</u>	16
<u>Item 4 - Vegetation removal and grading</u>	17
<u>Item 5 - New items present / increased usage</u>	18
<u>Item 6 - Vegetation removal and grading</u>	19
<u>Item 7 - Low resolution vegetation monitoring</u>	20

Inventory of Images

Imagery Provider	Abbr.	Date Time	Qty	Type	Resolution Category	Resolution (m/pixel)	View Images on Guardian
Copernicus - Sentinel 2	S2	March 09 - November 2 2025	9	Optical	Low	10 m	View images
Pleiadés	PL	September 9 2025	1	Optical	High	0.5 m	View Images
Maxar Worldview 3	MX3	October 4 2025	1	Optical	High	1.3 m	View Images

Methodology and Analyst Commentary

Analyst Commentary

Activity and excavation noted in previous reports appear to be ongoing. Areas of active excavation within the Middle Facility have been graded, and new piles of soil and gravel are visible.

Multiple instances of vegetation removal are also observed, including patches within the Middle Facility, a large portion of the Vegetation Area, and areas along the west side of the construction site. In both the former Middle Facility and the Vegetation Area, vegetation has largely been replaced by white rectangular objects stored across the site.

These objects are also present in areas previously occupied by vehicles within the Northern Former Facility and the Southern Construction Site.

Finally, likely as a result of the extensive vegetation removal, vegetation index monitoring values (NDVI and MSAVI2) show a downward shift across all seasons when compared to last year. Closer examination of the imagery does not indicate that the remaining vegetation is unhealthy.

Within this Delivery Report, the following types of changes were assessed:

1. Timeseries of NDVI over time to assess general area vegetation health in 2025
2. Evidence of new buildings or construction, evidence of excavation or grading, evidence of agricultural activity

Methodology

1. **Analyze** low resolution data using the NDVI to track vegetation health. Quality check and visualize results of analysis
2. **Inspect** available Optical High resolution satellite imagery to identify potential locations of changes.
3. **Categorize** changes into either: new buildings or construction, evidence of excavation or grading, evidence of agricultural activity and additional observations
4. **Create Delivery Report**. The outcomes of all prior steps are analyzed and findings are described in the Delivery Report.

Imagery Resolution

Following types of imagery are used in this Delivery Report:

- Low resolution (10 m / pixel)
 - Sentinel 2-B
- High resolution (0.5 - 1 m/pixel)
 - Pleiades
 - Maxar Worldview 3

Vegetation Indices Explained

In order to assess specific features of observed surfaces, all remote sensing indices are calculated using a combination of the visible electromagnetic spectrum wavelength bands - Red, Blue, as well as the Near InfraRed (NIR) band.

In this Change Detection Analysis, we use the NDVI vegetation index:

NDVI - Normalized Difference Vegetation Index

NDVI is the fundamental index used for vegetation health assessment. It uses differences in NIR and Red bands to indicate the condition of the greenery. Higher values indicate healthy vegetation with a higher content of chlorophyll and/or more dense vegetation cover. Lower values indicate vegetation that is less healthy, or which populates the ground sparsely.

MSAVI2 - Modified Soil-Adjusted Vegetation Index 2

Modified Soil-Adjusted Vegetation Index 2 (MSAVI2) is a soil adjusted vegetation index that addresses the NDVI limitations when applied to areas with a high degree of exposed soil surface. It introduces a soil brightness correction factor into its equation and it is best applied for areas such as fields and meadows, where lower vegetation such as grasses occur in combination with bare soil.

How to interpret NDVI values

Max = 1 Healthy and abundant vegetation, high content of chlorophyll

Min = 0 No vegetation present, dead vegetation, out of season detection

When interpreting vegetation indices values, it is important to assess them in the context of the previous years' development and due to seasonality. For this purpose, we use Sentinel-2 satellite imagery with data available in 2024 and 2025.

High Resolution Time Series



LAST IMAGE of the PRIOR Change period
• May 25, 2024 Pleiades Neo



FIRST IMAGE of the Change period •
September 9, 2025 - Pleiades



LAST IMAGE of the Change period •
October 4, 2025 - Maxar Worldview 3

High Resolution Time Series



LAST IMAGE of the PRIOR Change period • May 25, 2024 Pleiades Neo (High res)

High Resolution Time Series



FIRST IMAGE of the Change period • September 9, 2025 - Pleiades

High Resolution Time Series



LAST IMAGE of the Change period • September 9, 2025 - Maxar WorldView 3

Low Resolution Time Series



FIRST IMAGE of the Change period • March 9, 2025 - Sentinel S2



LAST IMAGE of the Change period • November 2, 2025 - Sentinel S2

AOI Sectors



Change Detection Summary



AOI	Change Detection Scope	Item
Middle facility	Ongoing stockpiling of soil	1
Middle facility	Extensive stockpiling of equipment / increased usage	2
N Former facility	Extensive stockpiling of equipment / increased usage	3
Vegetation area	Evidence of parking lot expansion	4
Construction site	Cars have been replaced with white objects	5
Construction site	Extensive vegetation removal and grading	6
Vegetation area	Vegetation index monitoring	7

Item 1 - Soil Stockpiling / Excavation

AOI	Change Detection Scope	Commentary
Middle facility	Ongoing signs of excavation and soil stockpiling	Construction and stockpiling of soil visible in 2024 continues in 2025 along with active excavation in the middle facility.



Image 1 - 2: May 24, 2024 - PN (High Res)



Image 3: September 9, 2025 - PL (High res)



Image 4: October 4, 2025 - MX3 (High res)

We can see new large piles of soil and / or gravel have appeared in 2025. More area appears to have been graded since 2024.

Item 2 - Increased Usage and Storage

AOI	Change Detection Scope	Commentary
Middle Facility	Increased usage	Vehicles and vegetation present in May 2024 have been replaced with large numbers of white objects.



Image 1: May 24, 2024 - PN (High Res)



Image 2: September 9, 2025 - PL (High res)

Item 3 - New items present

AOI	Change Detection Scope	Commentary
North Facility	Increased usage	Vehicles and vegetation present in 2024 have been replaced with large numbers of white objects. These remain in October, and we see increasing numbers of the black objects in October as well.



Image 1: September 9, 2025 - PL (High res)

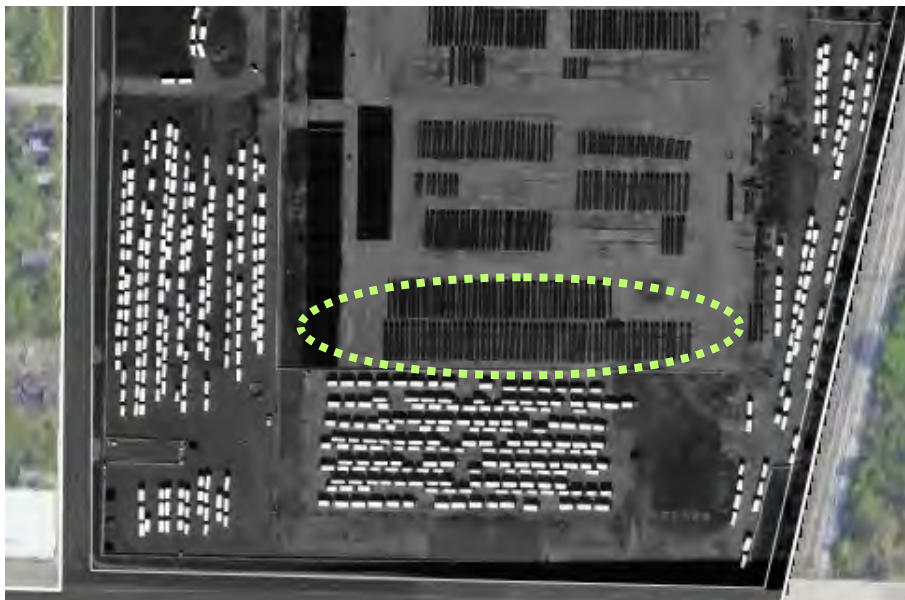


Image 2: October 4, 2025 - MX3 (High res)

Item 4 - Ongoing vegetation clearing

AOI	Change Detection Scope	Commentary
Vegetation area	Evidence of new construction or excavation	Evidence of extensive grading and vegetation clearing



Image 1: May 24, 2024 - PN (High Res)



Image 2: September 9, 2025 - PL (High res)

We can see that this vegetated area has been removed, graded and is now used to store additional objects. The cars visible to the left on the May 2024 image have also been removed and replaced with white objects.

Item 5 - Increased useage for storage

AOI	Change Detection Scope	Commentary
S. Construction area	Evidence of increased parking lot usage for storage	We can see cars in this area have been replaced by the same white objects visible in other AOI



Image 1: May 24, 2024 - PN (High Res)



Image 2: September 9, 2025 - PL (High res)



Image 3: October 4, 2025 - MX3 (High res)

Item 6 - Vegetation removal and grading

AOI	Change Detection Scope	Commentary
S. Construction area	Evidence of extensive vegetation removal	We can see the large patch of trees and vegetation in the lower left of the May 2024 image has been mostly removed in images from Fall 2025.



Image 1: May 24, 2024 - PN (High Res)



Image 2: September 9, 2025 - PL (High res)



Image 3: October 4, 2025 - MX3 (High res)

Item 7 - Low Resolution vegetation analysis

AOI	Change Detection Scope	Commentary
Vegetation area	Vegetation monitoring	Vegetation monitoring can provide us with additional information on how vegetation areas are (or aren't) being maintained. We see that compared to 2024, values have shifted down for the entire year. This likely reflects the vegetation removal that we can see in various AOIs above.

