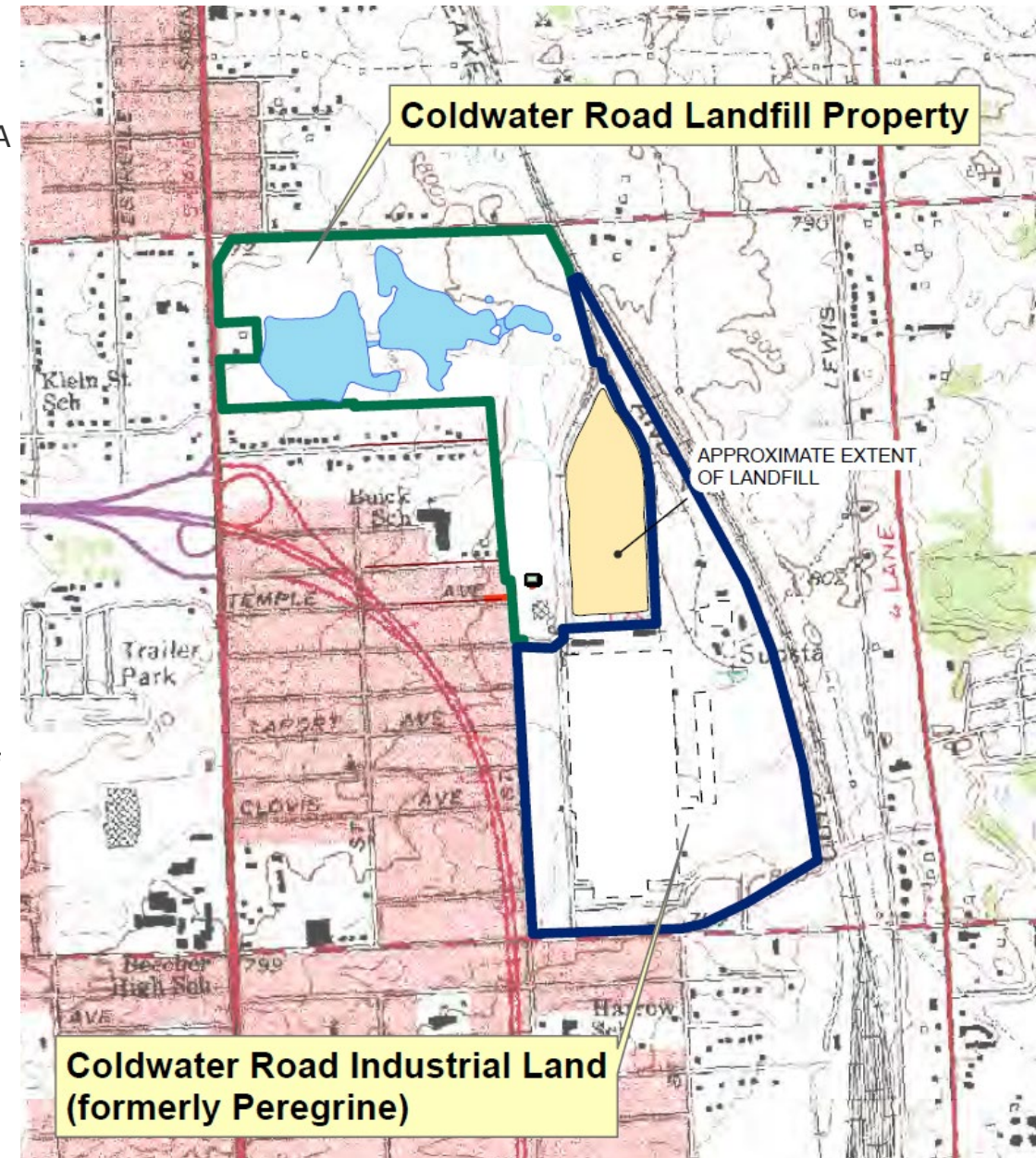


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RACER TRUST
COLDWATER ROAD SITE
PFAS ACTIVITY PROGRESS
REPORT – April 24, 2024

INTRODUCTION

- ❑ Remediation at the RACER Coldwater Road Site is being performed through the RCRA Corrective Action program under the oversight of EGLE. Current activities include RCRA hazardous waste landfill operation and maintenance (O&M), assessment of potential off-site vapor intrusion, and per- and polyfluoroalkyl substances (PFAS) focused site characterization, interim actions, monitoring, and evaluations. A no further action determination was received from EGLE on April 9, 2024, for the vapor intrusion to indoor air pathway. In addition, activities are being completed to address EGLE's WRD Violation Notice dated May 4, 2022 that is related to PFAS.
- ❑ Characterization of PFAS in groundwater in glacial deposits to depths of approximately 100 feet below the ground surface is generally completed. Groundwater within the drift aquifer, which may be utilized for drinking water, generally meets drinking water standards. PFAS has been found primarily in shallow (<45 feet below ground surface) groundwater at the Site, except adjacent to the north-eastern portion of the Site where deeper impacts have been observed. PFAS in groundwater extends beyond a portion of the western and northern Site property boundaries.
- ❑ Interim actions for PFAS include replacement of one residential well and treatment of two residential wells, continued operation of the pre-treatment system for landfill discharges to the sanitary sewer, and efforts toward eliminating PFAS discharge offsite through storm and sanitary sewers. Discharges from the Western Pond to the storm sewer are now treated to remove PFOS in accordance with an NPDES Permit.
- ❑ Routine groundwater monitoring at the Site in the shallow (perched) zone and the drift aquifer is ongoing and is anticipated to continue. Monitoring of select residential wells, storm sewers, and sanitary sewers is anticipated at least for the next few years.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

GROUNDWATER

- Samples were collected from private wells at 1278 E. Stanley Road, and 1320 E. Stanley Road on January 4, 2024, and on March 20, 2024, and March 21, 2024. In the results from both residences, no PFAS were detected in the post-treatment samples.
- PFOS continues to be the primary PFAS detected in the Raw (untreated) water at both locations. The Raw water results during the January and March events at 1278 E. Stanley Rd. were above its Michigan drinking water criteria and within the range of previously detected concentrations.
- The Raw water PFOS concentration at 1320 E. Stanley Rd. during the January and March events were not above its Michigan drinking water criteria but were within the range of previously detected concentrations. The results have been shared with EGLE and the residents. It's our understanding that the newly enacted MCL for PFOS of 4 ng/l has not yet been adopted by EGLE and we should continue to apply the current PFAS rules and criteria at the Site until further notice.
- A technical memorandum summarizing the replacement of monitoring wells OBG MW-26 and OBG MW-27 was submitted to EGLE on March 8, 2024.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER – Pond Management

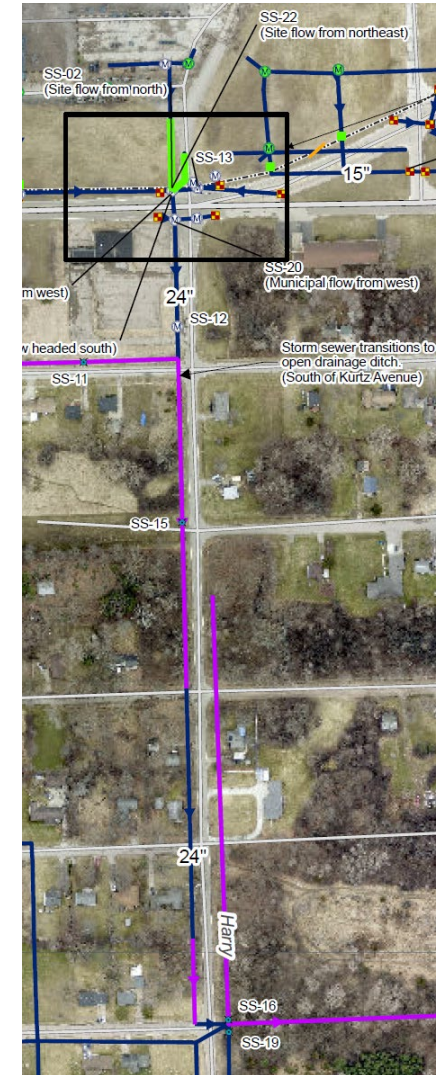
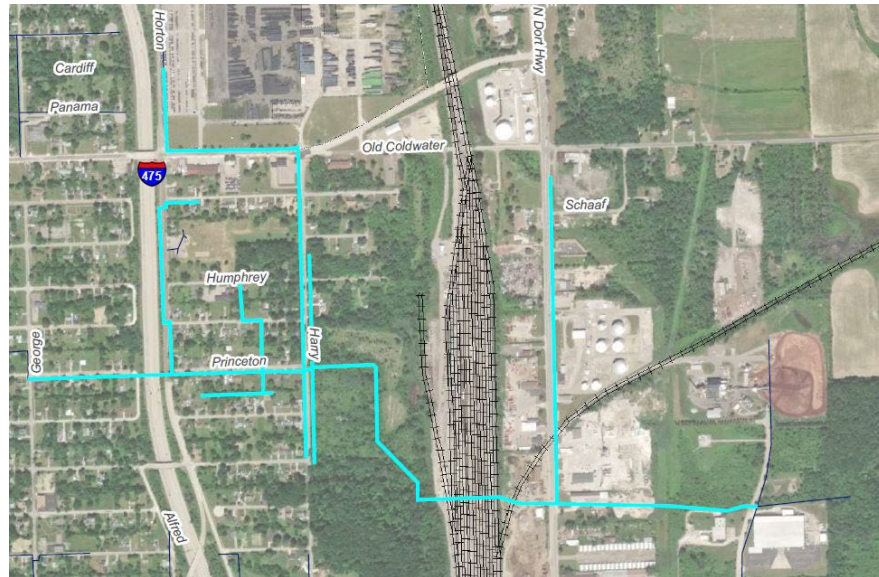
- A temporary PFAS treatment system is currently scheduled to remobilize the week of April 29, 2024 to treat the water from the Western Pond prior to discharge to the storm sewer system. Water from the Middle Pond is conveyed to the Western Pond by use of a siphon to lower the water level in the Middle Pond. The discharge will be completed in accordance with the NPDES Permit.
- Collected a round of onsite surface water samples on March 20, 2024. Results will be provided the week of April 29th.
- Additional topsoil and grass seed was spread over the top of the middle berm the week of March 11, 2024 to promote vegetation growth.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER - Sewers

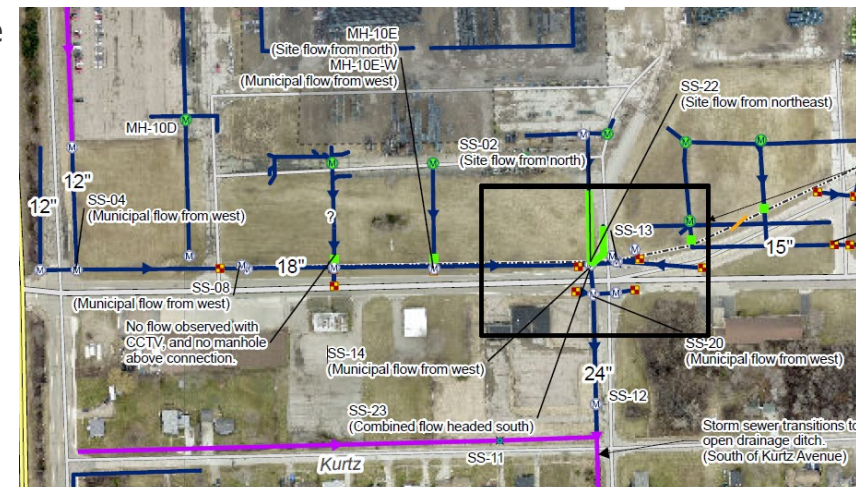
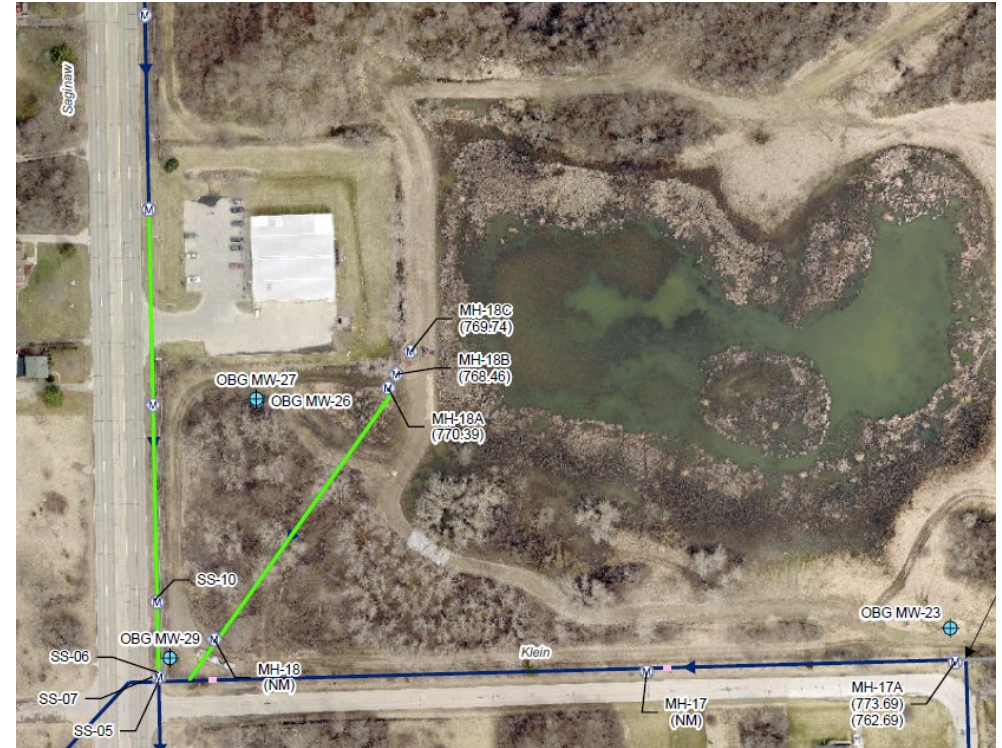
- Continued observation and evaluation of storm sewers south of the Site. A South of Site Evaluation Update Letter was submitted to EGLE on April 17, 2024.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

□ STORM WATER - Inspection

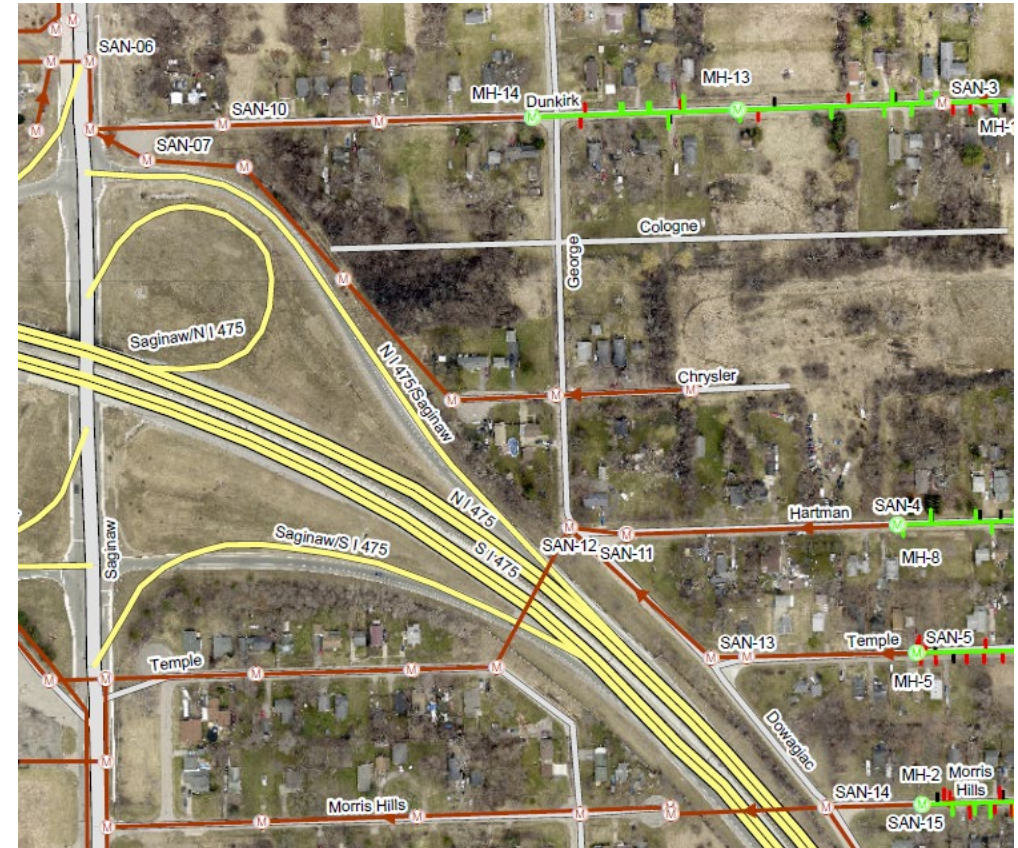
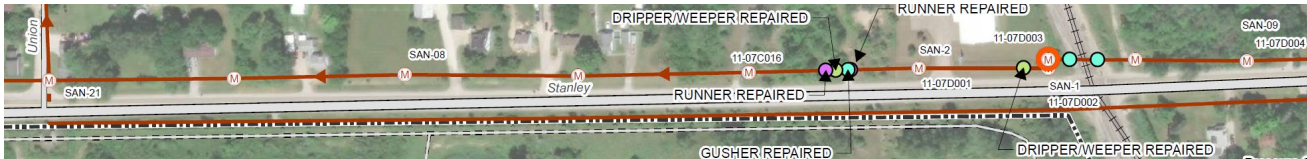
- The first quarter 2024 storm water inspection was conducted on April 4, 2024, observations include:
 - No uncontrolled discharge from the ponds to off-site or overtopping of berms was observed.
 - Water was flowing from the railroad spurs east and west of the landfill that convey stormwater to the culvert/swale, which empties into the Middle Pond.
 - Water was flowing from the western most drainage ditch west of the landfill/remaining materials area, which empty into the Middle Pond.
 - No flow has been observed from the Site in manhole MH-17A since the section of storm sewer between manholes MH-16 (which is east of MH-17A) and MH-17A were sealed in June 2021.
 - No water was flowing from MH-18A into MH-18, which empties into the 72-inch storm water sewer along Klein Street.
 - No dripping was observed from the plug at MH-10E since the storm water pipe leading to the outfall was plugged.
 - No dripping was observed from the plugs at SS-02 since the storm water pipe from the Site was plugged.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

❑ SANITARY SEWERS

- ❑ A Stanley Road Sanitary Sewer Update Letter summarizing the December 2023 sample results was submitted to EGLE and Genesee County Water and Waste Services on February 14, 2024.
- ❑ A West of Site Sanitary Sewer Update Letter summarizing the December 2023 sample results was submitted to EGLE and Beecher Metropolitan District on February 19, 2024.



WORK IN PROGRESS AND NEAR-TERM MILESTONES ANTICIPATED IN THE NEXT SEVERAL MONTHS

Activity	Schedule
PFAS Monitoring:	
<ul style="list-style-type: none"> ➤ Collect additional round of samples from the Stanley Road sanitary sewer ➤ Collect additional round of samples from West of the Site sanitary sewer ➤ Collect additional round of samples from South of Site storm sewer ➤ Storm water inspections and sampling (SS-17A & SS-02), if flow is observed ➤ Residential well sampling (1278 & 1320 E. Stanley Road) ➤ Annual PFAS Groundwater Sampling Event ➤ Surface water levels (Western & Middle Ponds) 	<p style="text-align: center;">June</p> <p style="text-align: center;">June</p> <p style="text-align: center;">June</p> <p style="text-align: center;">June</p> <p style="text-align: center;">June</p> <p style="text-align: center;">June</p> <p style="text-align: center;">Recorded Daily</p>
PFAS Corrective Measures:	
<ul style="list-style-type: none"> ➤ Operate temporary treatment system for discharge from Western/Middle Ponds 	<p style="text-align: center;">To be Determined. Tentatively scheduled to start first week of May</p>