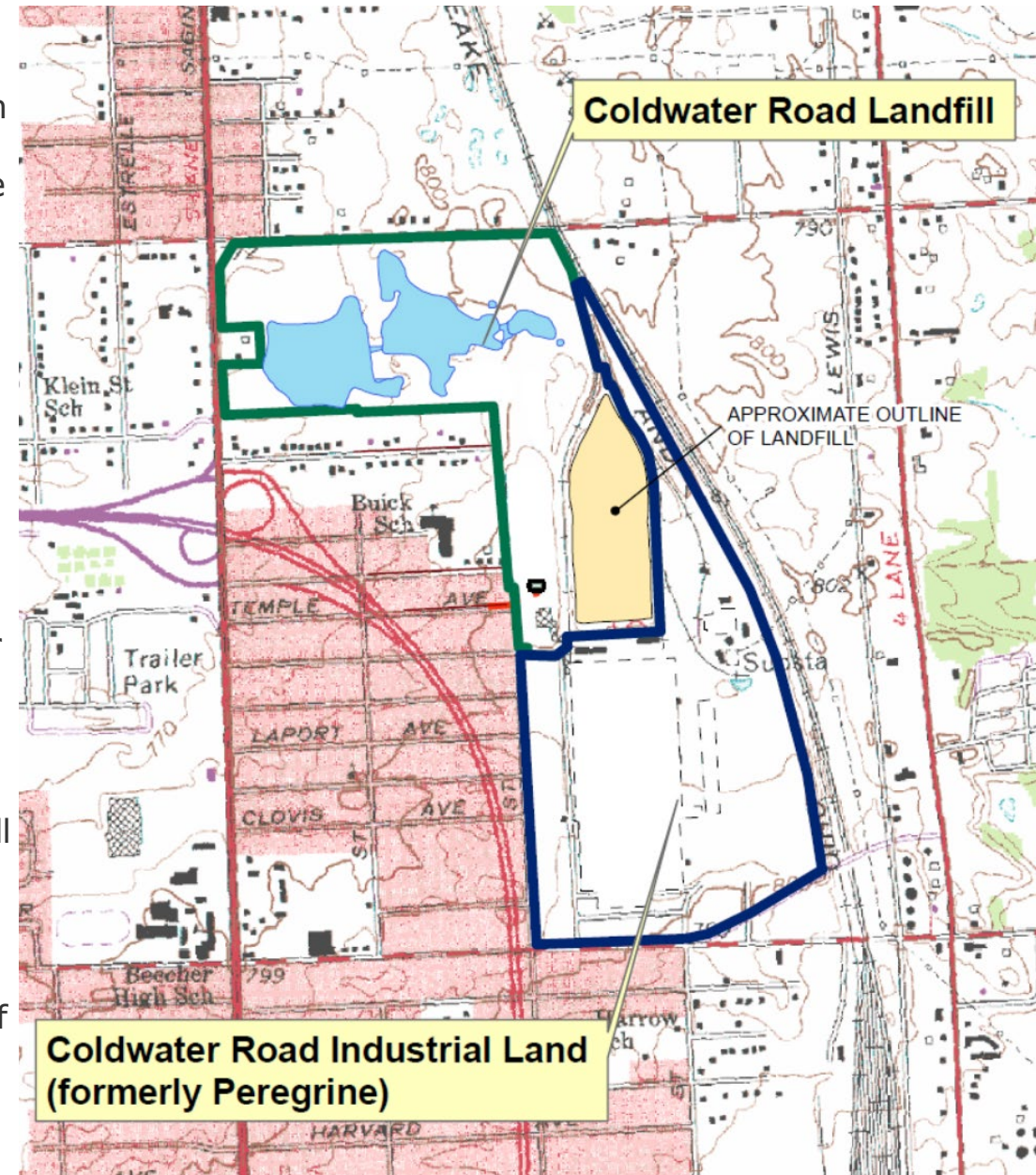


RACER TRUST
COLDWATER ROAD SITE
PFAS ACTIVITY PROGRESS
REPORT – April 18, 2023

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. 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 and treatment of one residential well, 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.
- ❑ 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, 2023. The January results from these wells were below the drinking water criteria, with the exception of the “raw” water from 1278 E. Stanley Road that had PFOS at a concentration of 37 ng/L. The results have been submitted to the well owners and agencies.
- Samples were collected from private wells at 1217 E. Stanley Road, 1278 E. Stanley Road, and 1320 E. Stanley Road on April 6, 2023, and the results are pending.
- An under the sink PFAS treatment system was delivered to the residents at 1320 E. Stanley Road on March 14, 2023. Given the USEPA’s proposed MCL for PFOS and the detected PFOS concentration in the well water at 1320 E. Stanley Road, RACER has offered to install and maintain a whole house treatment unit for the owners and are awaiting the return of an access agreement to begin the installation process.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

❑ STORM WATER – Pond Management

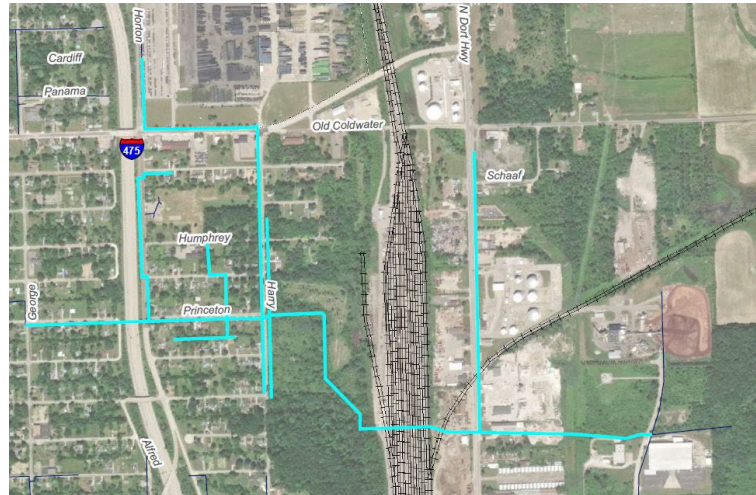
- ❑ The public notice for NPDES Individual Permit No. MI0060329 for the Site was posted on April 7, 2023, and will remain posted until May 7, 2023. The permit will cover discharge of treated pond water to the storm sewer system.
- ❑ A temporary PFAS treatment system is scheduled to remobilize in May 2023 to treat the pond 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.
- ❑ A transducer with telemetry was installed in each of the Middle and Western Ponds on April 4, 2023, in order to obtain more accurate, automated water levels from the ponds.
- ❑ In order to aid in evaluation of sources of PFAS to the Middle Pond, surface water samples were collected on March 2, 2023 from the two drainage ditches west of the landfill/remaining materials area which discharge stormwater to the Middle Pond.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER - Sewers

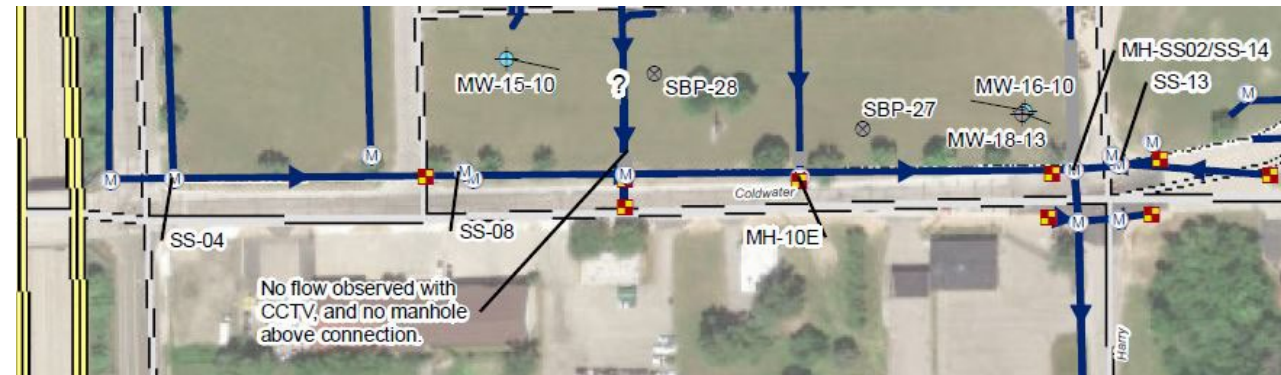
- Collected post lining storm water sampling along Saginaw Road (SS-10) on March 23, 2023. Manhole (MH-18) has been dry since the lining and sealed leaks were completed.
- Continued observation and evaluation of storm sewers south of the Site. Collected an additional round of storm water samples on March 23, 2023. A concrete sample was collected on February 14, 2023 from the storm sewer pipe just south of SS-12 before it flows underneath Kurtz Avenue.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER - Inspection

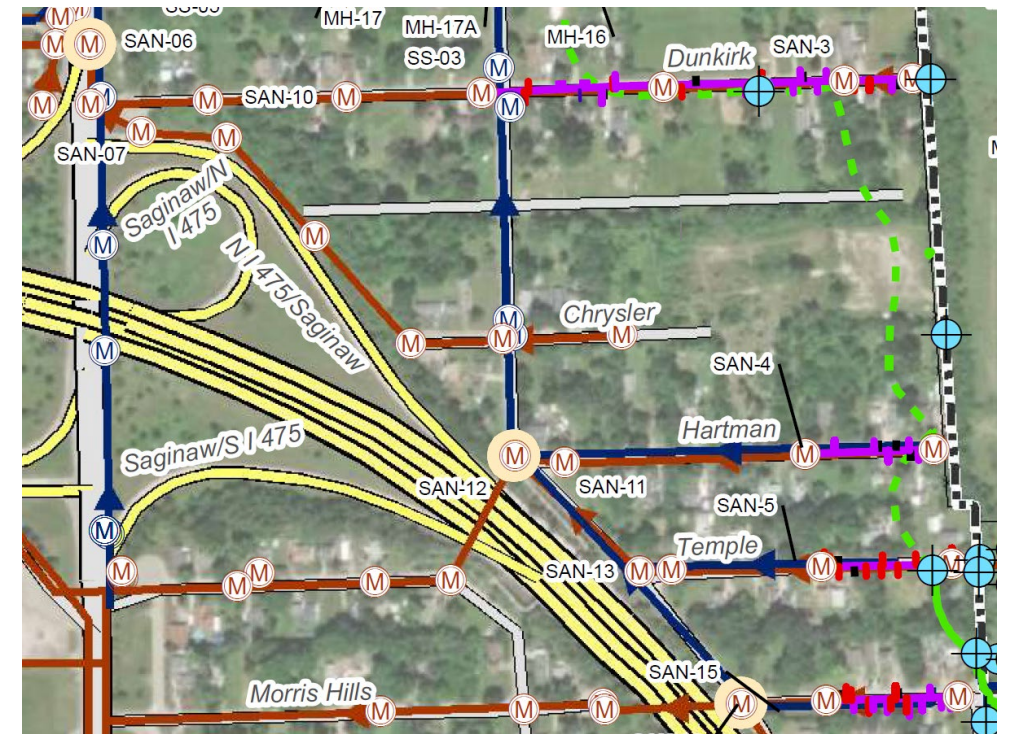
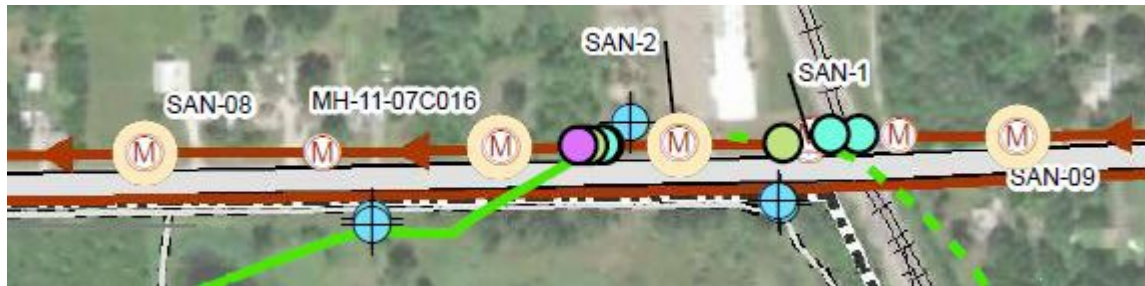
- The first quarter 2023 storm water inspection was conducted on March 23, 2023, observations include:
 - No discharge from the ponds to off-site or overtopping of berms was observed.
 - Water was flowing from the railroad spurs east and west of the landfill that convey stormwater to the culvert/swale, which discharges to the Middle Pond.
 - Water was flowing from the two drainage ditches west of the landfill/remaining materials area which discharge stormwater to 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 and MH-17A were sealed in June 2021.
 - 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 plug at SS-02 since the storm water pipe from the Site was plugged.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

❑ SANITARY SEWERS

- ❑ Submitted the Sewer Rehabilitation Completion Report documenting the lining of sewers and sealing of manholes west of the Site on March 15, 2023.
- ❑ Three laterals that were mistakenly reinstated for empty lots along Temple Avenue were sealed off using three full pipe liner segments (i.e., "patches") on March 1, 2023.
- ❑ Collected Sanitary Sewer Samples along Stanley Road and West of Site on April 6, 2023.



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

Activity	Schedule
PFAS Monitoring:	
➤ Prepare and submit memo providing summary of Stanley Road sanitary sewer sampling results	May
➤ Prepare and submit report summarizing the storm water inspections and sampling completed in January and March	May
➤ Prepare and submit summary of sampling results south of Site and include recommendations for any additional work	May
➤ Distribute private well sampling results	May
➤ Collect sanitary sewer samples along Stanley Road and west of Site	June
➤ Storm water inspections and sampling (SS-17A & SS-02), if flow is observed	June
➤ Private well sampling (1278 & 1320 E. Stanley Road)	June
➤ Post lining storm water sampling along E. Klein Street and Saginaw Road	June
➤ Surface water levels (Western & Middle Ponds)	June
Recorded Daily via transducers	
PFAS Corrective Measures:	
➤ Work with EGLE to obtain NPDES Permit for any needed discharges from the Middle/Western Ponds	Permit expected to be issued after end of public comment period in May
➤ Operate temporary treatment system for discharge from Western/Middle Ponds	May