

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard, LU-9J
Chicago, Illinois 60604-3590

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

Date: January 15, 2024
Our Ref: 30167840

Subject: Semi-Annual Progress Report, July 2023 – December 2023
Performance Based Administrative Order on Consent
Docket No. RCRA-5-2011- 0019; RACER Trust Pontiac North Campus
Site 11970 - MID 005 356 886, MID 085 470 102 & MID 005 356 910
Pontiac, Michigan

Dear Mr. Ramanauskas/Ms. Stanhope,

This progress report has been prepared in accordance with Section VI (24b) of the Administrative Order of Consent (AOC; Docket Number RCRA-05-2011-0019) entered into by the Revitalizing Auto Communities Environmental Response Trust (RACER Trust) and the United States Environmental Protection Agency (USEPA) for the above referenced Site. The following summarizes the work performed, data collected, estimated percent complete, project schedule, and problems encountered for the period July 1, 2023 through December 31, 2023 for the portions of the Pontiac North Campus (PNC or Site) for which RACER Trust is responsible for remediation. Please note that based on agreement with USEPA, the Joslyn properties are not included under RCRA Corrective Action and are being addressed separately with USEPA and the Michigan Department of Environment, Great Lakes, and Energy (EGLE). Summary of progress addressing the Joslyn properties is, however, provided in this report.

Work Performed from July 1, 2023, through December 31, 2023:

(Includes references to reports which provide relevant details and data collected)

- Submitted January – June 2023 Semi-Annual Progress Report to USEPA on July 15th, 2023.
- On August 4th, 2023, RACER received a letter informing of re-parceling and sale at the Tatro owned properties. This will be further summarized in the 2023 Annual Inspection Report to be submitted in first quarter of 2024.
- Prepared and submitted 2022 Annual Groundwater Monitoring Report on August 10th, 2023.
- Prepared and submitted Initial Sampling Summary and Proposed 2023 Supplemental PFAS Sampling Plan on August 17th, 2023. USEPA comments were provided via email on September 7th, 2023. A response to USEPA was provided via email on September 11th, 2023. Email concurrence and verbal approval of the plan was approved in September 2023 so the work could be conducted. A revised plan was submitted on September 29th, 2023 to USEPA to address their comments, and the final report was submitted on December 8th, 2023.
- Planned and completed third and fourth quarter groundwater and soil vapor monitoring at Former Fiero properties from August 28th – 31st, 2023, and November 27th – December 5th, 2023, respectively.

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
January 15, 2024

- Prepared and submitted 2022 Property Inspection Report on August 31st, 2023.
- Planned and completed site-wide annual groundwater sampling event from September 11th – 25th, 2023.
- Planned and completed a supplemental site-wide PFAS groundwater sampling event from September 11th – 25th, 2023.
- During site-wide gauging for the annual and supplemental PFAS groundwater sampling events, LNAPL was detected in two on-site monitoring wells in areas previously not known to contain LNAPL. Upon discovery of the LNAPL, the two on-site wells and nearby monitoring wells have been gauged, and LNAPL has been removed on a weekly basis since September 11th, 2023. A LNAPL sample was collected from each monitoring well on September 29th, 2023. A memorandum summarizing the information collected and associated recommendations will be submitted to the USEPA.
- Planned and completed third and fourth quarter Joslyn groundwater sampling from September 22nd – 26th, and December 14th – 19th, 2023, respectively.
- Prepared and submitted Supplemental RCRA Facility Investigation Scope of Work on September 26th, 2023. USEPA comments were provided via email on October 31st, 2023 and were addressed via email response on November 1st, 2023. USEPA provided approval to the responses and scope of work via email transmittal on November 3rd, 2023. A revised scope of work was submitted to USEPA on November 28th, 2023.
- Prepared and submitted 2023 Fiero Temporary Monitoring Plan – Second Quarter Results Memo on October 3rd, 2023.
- Prepared and submitted 2023 Joslyn Temporary Monitoring Plan – First and Second Quarter Results Memo on October 11th, 2023.
- Planned and completed annual inspection activities for 2023, including monitoring well inspections, DRC inspections and PCB Cap inspections. This inspection will be documented in the 2023 Annual Inspection Report proposed to be submitted First Quarter 2024.
- Planned and completed soil characterization field work for the Supplemental RCRA Facility Investigation Scope of Work approved by USEPA from November 6th – 11th, 2023.
- On December 28th, 2023, accumulated solids from the groundwater in the Montcalm seep vault was cleaned out and placed within a 55-gallon drum for future offsite removal by a licensed waste hauler.
- Conducted routine O&M associated with the Montcalm Street Seep Control System from July through December 2023; seepage of groundwater from the Site onto Montcalm Street continues to be prevented during this timeframe.
- Began evaluation of treatment, discharge, and prevention options for the Montcalm seep, including preparation of a pilot treatability study plan and an upgradient sheet pile wall (to potentially prevent groundwater seepage from occurring).
- Continued support and coordination with existing property owners to complete necessary corrective action activities.

Data Collected

Data collected relevant to the Work Performed described above is included in the applicable report submittals.

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 January 15, 2024

Estimated Percent Complete

Project Management Ongoing

Corrective Action – General

- Current Conditions Report submitted to USEPA (11/25/11) 100%
- 2012 Budget Authorization approved by USEPA (12/9/11) 100%
- Environmental Indicators Report submitted to USEPA (12/29/11) 100%
- 2012 Budget Amendment 1 approved (2/10/12) 100%
- Draft RFI Report submitted to USEPA (7/9/12) 100%
- 2012 Budget Amendment 2 approved by USEPA (9/19/12) 100%
- 2012 Budget Amendment 3 approved by USEPA (9/19/12) 100%
- 2013 Budget Authorization approved by USEPA (1/25/13) 100%
- Draft CMP Report submitted to USEPA (3/15/13) 100%
- 2013 Budget Amendment 1 approved by USEPA (7/18/13) 100%
- 2013 Budget Amendment 2 approved by USEPA (11/12/13) 100%
- 2014 Budget Authorization approved by USEPA (11/20/13) 100%
- 2014 Budget Amendment 1 approved by USEPA (5/23/14) 100%
- 2015 Budget Authorization approved by USEPA (11/20/14) 100%
- Fiero Focused CMS approved by USEPA (7/1/15) 100%
- Draft Fiero CMI Work Plan (10/7/15) 100%
- 2016 Budget Authorization approved by USEPA (11/20/15) 100%
- 2016 Budget Amendment 1 approved by USEPA (9/9/16) 100%
- 2017 Budget Authorization approved by USEPA (11/22/16) 100%
- 2018 Budget Authorization approved by USEPA (12/12/17) 100%
- Draft Fiero CA 725 and CA 750 submitted to USEPA (12/22/16) 100%
- Draft Duck Pond CACC submitted to USEPA (1/6/17) 100%
 (Pursue this request only if needed for a potential sale of the property)
- Fiero CA 725 and 750 approved by USEPA (8/11/17) 100%
- Revised Draft PNC CMS submittal to USEPA NA
 (CA Summary Report to be submitted instead of CMS, see below)
- 2018 Budget Amendment 1 approved by USEPA (7/18/18) 100%
- 2019 Budget Authorization approved by USEPA (11/23/18) 100%
- 2020 Budget Authorization approved by USEPA (12/20/19) 100%
- 2020 Budget Modification 1 approved by USEPA (2/3/20) 100%
- 2021 Budget Authorization approved by USEPA (12/11/20) 100%
- 2022 Budget Authorization approved by USEPA (11/22/21) 100%
- 2023 Budget Authorization approved by USEPA (12/15/22) 100%
- 2024 Budget Authorization approved by USEPA (draft submitted on 10/27/23) 95%
- Draft Corrective Action (CA) Summary Report and Draft LNAPL Appendices
 Submitted to USEPA (Drafts 3/8/21 and 6/19/21, respectively) 100%
- Responses to USEPA Comments on Draft CA Summary Report (10/21/21) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (3/02/22) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (5/03/22) 100%

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 January 15, 2024

- Revised Draft CA Summary Report, including Data Re-Screening (2/10/23) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (7/25/23) 100%
- Revised CA Summary Report, based on USEPA comments received 4/12/23 (7/25/23) 100%
- Supplemental RCRA Facility Investigation Scope of Work (Draft 9/26/23). Response to USEPA comments (11/01/23) 100%
- Final submittal of Supplemental RCRA Facility Investigation Scope of Work (11/28/23) 100%

Corrective Measures – Institutional Controls

- Declaration of Restrictive Covenants (DRCs) recorded for all Site parcels 60%
- Recorded USEPA and MDEQ (now EGLE) approved DRC for the Duck Pond property (Nov 2016/ Montcalm Street) 100%
- Recorded DRC for the former Plant 14 South property (Nov 2017) 100%
- Recorded DRC for the USPS property (April 2018) 100%
- Submitted Draft First Amended DRC for Duck Pond Property to USEPA and EGLE (draft submitted 8/26/19; RACER to revise Draft and resubmit) 90%
- Obtained USEPA and EGLE approval of First Amended DRC for the Proastio Parcel (former Plant 14 South) and Railroad Parcels (4/17/20) and Recorded (5/12/20) 100%
- Obtained approval from USPS and recorded First Amended and Restated DRC for the USPS property (12/17/21) 100%

Corrective Measures – Soil

- AOI M-27 arsenic-impacted soil delineation completed (Mar 2013) 100%
- AOI M-27 arsenic-impacted soil removal (Dec 2013) 100%
- Draft Interim Measures Work Plan - TSCA Soil Cap (former Plant 14 south property) submitted to USEPA (5/13/15) 100%
- 2017 PCB Soil Delineation Summary Memo submitted to USEPA (2/27/17) 100%
- 2018 PCB Soil Delineation Summary Memo submitted to USEPA (5/08/18) 100%
- 2018 Additional PCB Soil Delineation Summary Memo submitted to USEPA (7/25/18) 100%
- PCB-impacted Soil Interim Measures Removal Work Plan approved by USEPA (7/10/19) 100%
- PCB-impacted Soil AOI W-1 IMWP Field Implementation (Nov 2019 – Jun 2020) 100%
- PCB-impacted Soil AOI W-1 IMWP Completion Report submitted to USEPA (3/31/21) 100%
- Completed Supplemental RCRA Facility Investigation field work (11/06/23-11/09/23) 100%

Corrective Measures – Groundwater/LNAPL

- LNAPL investigation on USPS property (Sept-Nov 2012) 100%
- Quarterly monitoring of USPS transmissivity/sentry wells (Feb-Dec 2013) 100%
- LNAPL investigation at AOIs M-2 and W-8 (Aug-Nov 2013) 100%
- PCB delineation at AOIs M-2, LNAPL Areas 1/7, 2A, 2B (June-Dec 2014) 100%
- 2013/2014 LNAPL Investigation Tech Memo submitted to USEPA (1/30/15) 100%
- Draft PCB Investigation Summary Memo submitted to USEPA (2/6/15) 100%
- Additional PCB LNAPL Delineation Activities (Apr-June 2015) 100%
- Draft 2014-2015 PCB Investigation Summary Memo submitted to USPEA (8/17/15) 100%
- Supplemental Site (USPS Property) Characterization Summary Report submitted to USEPA (7/21/16) 100%

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 January 15, 2024

- Supplemental Soil Gas Data Evaluation Memo (USPS Property) submitted to USEPA (9/1/16) 100%
- Supplemental 1,4-Dioxane Investigation Summary Report submitted to USEPA (12/7/17) 100%
- LNAPL Interim Measures Feasibility Confirmation and Pre-Design Specification Testing memorandum submitted to USEPA (4/27/18) 100%
- Supplemental 1,4-Dioxane/VOC Groundwater Investigation Summary Report submitted to USEPA (6/13/18) 100%
- Additional LNAPL Pre-Design / Transmissivity Testing and Interim Measures Removal Work Plan submitted to USEPA (8/27/18) 100%
- Supplement to June 13, 2018 1,4-D/VOC Memo Report; Evaluation of Groundwater Data Compared to USEPA Screening Levels (1/9/19) 100%
- LNAPL Interim Measures Removal Implementation at RW-08-14 (May 2019) 100%
- Duck Pond Summary for GSI Pathway Determination submitted to USEPA (6/18/19) 100%
- 2019-2020 Duck Pond GW Investigation Memo submitted to USEPA (4/7/20) 100%
- LNAPL Recovery System (RW-08-14) Completion Memo Report (4/28/20) 100%
- Fiero Property VI USEPA/EGLE-Approved SOW Field Implementation (9/2/20) 100%
- 2020 Additional Tn Testing Memorandum Report submitted to USEPA (3/4/21) 100%
- Fiero Property Well Installation & Groundwater Monitoring Report submitted to USEPA (5/14/21) 100%
- Fiero Property Conceptual Site Model (CSM) Report (9/8/21) 100%
- Fiero Property Source Investigation Scope of Work (9/7/21) 100%
- DRAFT 2021 RW-08-14 Tn Testing / Shutdown Request Memorandum submitted to USEPA (12/21/21) 100%
- Response to USEPA Comments on 2021 RW-08-14 Tn Testing / Shutdown Request Memorandum (4/25/22) 100%
- Fiero Site Investigation Summary Report (Draft 4/27/22, Comments provided by USEPA on 6/6/22, Response to comments provided on 7/15/22, Additional comments provided by USEPA on 8/8/22, Response to comments provided on 9/9/22, Final 2/23/23, No further comments from USEPA in email dated 7/7/23) 100%
- 2022 RACER Pontiac North Campus Water Well Survey (Draft 6/24/22; revised version submitted to USEPA on 10/20/23 to address USEPA comments) 100%
- Fiero Property SOW Implementation and CSM Refinement completed (July/August 2022) 100%
- In Situ Chemical Reduction with ZVI Pilot Study Workplan (Draft 7/7/22, USEPA and EGLE approval 11/18/22, Final 1/04/23 incorporating comments provided by USEPA and EGLE) 100%
- Zero Valent Iron Pilot Test Work Plan Presentation to USEPA and EGLE (10/7/22) 100%
- Final RW-08-14 Shutdown Request Memorandum (7/21/22; USEPA approval on 7/25/22) 100%
- Additional Fiero investigation work and ZVI performance well installation (October 2022) 100%
- RW-08-14 LNAPL System Decommission Memo (Draft 10/26/22, Final 4/12/23) 100%
- Former Fiero Property Supplemental Site Investigation Scope of Work Report – Dated July 21, 2022 (final submitted 12/21/22) 100%
- In Situ Chemical Reduction with Zero Valent Iron Pilot Study Installation Summary (Final 3/20/23) 100%

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 January 15, 2024

Groundwater Monitoring and Other O&M

- 2011 Annual Groundwater Report submitted to USEPA (1/5/12) 100%
- 2012 Annual Groundwater Report submitted to USEPA (2/9/13) 100%
- 2013 Annual Groundwater Report submitted to USEPA (4/16/14) 100%
- 2014 Annual Groundwater Report submitted to USEPA (12/18/14) 100%
- 2015 Annual Groundwater Report submitted to USEPA (12/23/15) 100%
- 2016 Annual Groundwater Report submitted to USEPA (12/29/16) 100%
- 2017 Annual Groundwater Report submitted to USEPA (2/30/18) 100%
- Well Abandonment Request submitted to USEPA (3/7/18) 100%
- Groundwater Monitoring Program Modification Request submitted to USEPA (8/27/18) 100%
- 2018 Annual Groundwater Report submitted to USEPA (1/29/19) 100%
- 2019 Annual Groundwater Report submitted to USEPA (2/18/20) 100%
- Fiero Properties Well Locating Memo Report (12/18/20) 100%
- Fiero Properties Well Abandonment Memo Report (12/18/20) 100%
- 2020 Annual Groundwater Report submitted to USEPA (3/4/21) 100%
- 2021 Annual Groundwater Report submitted to USEPA (2/10/22) 100%
- Fiero Temporary Monitoring Plan (2/23/22) 100%
- Proposed Fiero Well Abandonment Memo (4/08/22) 100%
- RACER Pontiac North Campus 2021 Property Inspection Report (4/15/22) 100%
- 2022 Fiero Temporary Groundwater Monitoring Plan Summary (4/21/23) 100%
- Fiero First Quarter 2022 Results Data Memo (5/20/22) 100%
- Fiero Second Quarter 2022 Results Data Memo (9/7/22) 100%
- Fiero Third Quarter 2022 Results Data Memo (12/14/22) 100%
- 2022 Annual Groundwater Report submitted to USEPA (8/10/23) 100%
- 2022 Property Inspection Report (8/31/23) 100%
- 2023 Revised Fiero Temporary Monitoring Plan (Draft 2/16/23, Comments provided by USEPA on 2/27/23, Response to comments 3/9/23, USEPA approval received 3/16/23, and Final 4/4/23) 100%
- 2023 Fiero Temporary Monitoring Plan 1Q Results Memo (6/13/23) 100%
- 2023 Fiero Temporary Monitoring Plan 2Q Results Memo (10/3/23) 100%
- 2023 Fiero Temporary Monitoring Plan 3Q Results Memo (In Progress) 90%
- Montcalm Seep Control System Operation, Maintenance & Monitoring Ongoing

Storm Sewers

- Montcalm toe drain swale construction (Feb 2012) 100%
- Sewer bulkheading activities completed (Apr 2012) 100%
- Swale/sidewalk construction (Sept 2012) 100%
- Montcalm discharge investigation completed (July-Sep 2013) 100%
- Discharge Request submitted to City of Pontiac (Oct 2013) 100%
- Montcalm Avenue Sidewalk Amendment (1-foot aggregate cover) installed on the sidewalk (May 2015) 100%

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
 U.S. Environmental Protection Agency Region 5
 January 15, 2024

- Montcalm Discharge Feasibility Study/Data Collection (Jan - June 2015) 100%
- Montcalm Seep Assessment Memo submitted to USEPA (2/9/15) 100%
- Montcalm Seep IM Work Plan submitted to USEPA/MDEQ (11/10/17) 100%
- Montcalm Injection Test Summary Memo Report submitted to USEPA/MDEQ (1/31/18) 100%
- Montcalm Seep Interim Measures Revised Work Plan submitted to USEPA/MDEQ (4/13/18) – MDEQ Approval (6/8/2018), USEPA Approval (6/25/18) 100%
- Montcalm Seep Interim Measures Implementation (June 2019) 100%
- Fiero Summary of Former VOC Detections Memo Report submitted to USEPA (3/3/20) 100%
- Montcalm Seep Control System Completion Memo Report submitted to USEPA (7/15/20) 100%
- Montcalm IM Monitoring Report submitted to USEPA (09/10/20) 100%
- Montcalm Seep NPDES Permit Discharge Application submitted to EGLE (3/31/21), PFOS concentrations detected in samples collected need to withdraw or revise permit application 75%

Former RCRA Hazardous Waste Management Units (WMUs). Includes Fiero property WMU AOI F-3 (southern Fiero former hazardous waste drum storage pad), Fiero property AOI F-6 (northern Fiero former Plant 17 tank farm), and USPS property WMU AOI W-2 (west yard former hazardous waste storage)

- Soil/groundwater delineation completed during RFI activities (2001-2011) 100%
- Receipt of MDEQ letter “Referred to Corrective Action for Closure; Revitalizing Auto Communities Environmental Response (RACER) Trust, Former Fiero Assembly Plant, Pontiac, Michigan; MID 005 356 910” March 3, 2013. 100%
- Proposed corrective measures for WMUs (site-wide deed restrictions) incorporated into Fiero Focused CMS (USEPA approved on 7/1/15) and CA Summary Report (being revised). 100%
 - Anticipated deed restrictions will prohibit the use of groundwater, limit the use of the property to non-residential, and require soil and soil vapor management in accordance with Michigan regulations.
- MDEQ Waste Management Division inspection of 2 former waste management units (WMUs) on the Fiero property (4/15/15). No violations or comments. 100%
- MDEQ Waste Management Division inspection of 2 former waste management units (WMUs) on the Fiero property (10/25/17). No violations or comments. 100%
- EGLE Waste Management Division focused Corrective Action Inspection of the RACER PNC Site (7/27/20) and Acceptance of Responses (8/26/20) 100%
- Addressed in CA Summary Report included in Corrective Action – General section above

Initial Groundwater Screening for PFAS

- Initial PFAS Sampling Plan (Draft 2/3/23, Comments provided by USEPA on 3/3/23, Response to Comments provided on 4/7/23, Final 4/18/23) 100%
- Initial PFAS Sampling Results and Supplemental PFAS Sampling Plan (12/8/23) 100%
- PFAS Groundwater Sampling Summary (In Progress) 75%

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
January 15, 2024

Joslyn Avenue Parcels (Not subject to RCRA CA)

• Submitted Joslyn Ave Parcel Historical Summary Memorandum & RCRA Determination (1/19/21). USEPA approved with conditions.	100%
• Joslyn North Parcel Investigation Report submitted to USEPA (8/03/21) USEPA approved No Further Action with a condition requiring a DRC (9/29/2021)	100%
• Joslyn South Parcel Investigation Report submitted to USEPA & EGLE (Draft 8/24/21)	100%
• Joslyn North Parcel Well Abandonment Summary Memo submitted to USEPA (12/20/21)	100%
• Draft DRC for Joslyn North Property submitted to USEPA and EGLE (1/7/2022) Approved by USEPA 3/1/2022; EGLE review pending	95%
• Joslyn South Parcel Delineation Investigation (Field Work Completed 11/19/21-12/10/21)	100%
• Joslyn South Parcel Investigation Report (7/15/22)	100%
• Joslyn South Parcel on-site soil borings (12/19/22)	100%
• 2022 Joslyn South Parcel Groundwater and Soil Investigation Summary Report (5/12/23)	100%
• 2023 Joslyn Temporary Monitoring Plan First and Second Quarter Results (10/11/23)	100%

Project Schedule – Work to be Completed During Next Reporting Period

An updated task-based Gant chart for the 2024 Project Schedule is attached. Items scheduled to be completed during the next reporting period:

- Submittal of 2023 Annual Groundwater Monitoring Report
- Submittal of 2023 Annual Property Inspection Report
- Submittal of PFAS Groundwater Sampling Summary
- Submittal of 2023 Fiero Temporary Groundwater Monitoring Plan 3Q Results Memo
- Submittal of 2023 Fiero Temporary Groundwater Monitoring Plan Summary
- Submittal of 2024 Fiero Temporary Groundwater Monitoring Plan
- Submittal of 2023 Joslyn Semi-Annual Data Package (3Q and 4Q 2023) – after submittal of report will request EGLE response before sampling will continue for 2024
- Discuss results of Supplemental RCRA Facility Investigation Scope of Work with USEPA
- If determined to be necessary, complete second phase of Supplemental RCRA Facility Investigation Scope of Work and prepare summary report for submittal
- Assess need for existing monitoring wells site-wide and submit a request to USEPA for abandonment
- Submit a request to USEPA for well redevelopment, repair, and replacement if needed
- If determined necessary, complete soil vapor and groundwater monitoring for Fiero temporary monitoring plan and ZVI Pilot Test performance monitoring
- If determined necessary, complete additional PFAS characterization
- Following USEPA approval of the Revised CA Summary Report, an Operation, Maintenance, and Monitoring (OMM) Plan will be prepared that will include a revised Groundwater Monitoring Program for the Site. This document will be provided to USEPA for review and approval.
- Continue Montcalm Seep Control System IMWP OMM
- Continue PFAS Risk Evaluation and remedial option evaluation for seep
- Respond to any comments received from USEPA or EGLE on submittals or other matters
- Provide support to USEPA and initiate updates to other RCRA decision process documents as determined appropriate

Mr. Peter Ramanauskas/Ms. Jennifer Stanhope
U.S. Environmental Protection Agency Region 5
January 15, 2024

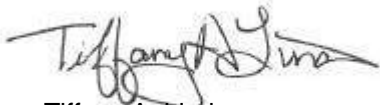
- Support development and finalization of deed restrictions for the Site as determined appropriate

Problems Encountered

No problems were encountered during the reporting period.

Should you have any questions on the information provided within this progress report, please feel free to contact Brendan Mullen or David Favero with RACER Trust at bmullen@racertrust.org/dfavero@racertrust.org 201-247-4890/217-741-6235 or me.

Sincerely,
Arcadis of Michigan, LLC



Tiffany A. Linder
Certified Project Manager

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

CC. Dan Dailey, EGLE
Emily Bertolini, EGLE
Dave Favero, RACER Trust
Brendan Mullen, RACER Trust

Enclosures:

Attachment

- 1 2024 Project Schedule

Attachment 1

2024 Project Schedule

RACER Pontiac North Campus
2024 Annual EA Budget Request
Project Schedule

ID	Task Name	Duration	Start	Finish	12/24	January 1 1/7	1/21	February 1 2/4	2/18	March 1 3/3	3/17	3/31	April 1 4/14	4/28	May 1 5/12	5/26	June 1 6/9	6/23	July 1 7/7	7/21	August 1 8/4	8/18	September 1 9/1	9/15	9/29	October 1 10/13	10/27	November 1 11/10	11/24	December 1 12/8	12/22
1	Task 1 - Project Management	263 days	Mon 1/1/24	Tue 12/31/24	[Summary bar]																										
2	Monthly PM Activities	263 days	Mon 1/1/24	Tue 12/31/24	[Summary bar]																										
15	Prepare, Submit & Obtain Approval of 2025 Budget Authorization	64 days	Mon 9/2/24	Thu 11/28/24	[Task bar]																										
16	Task 2 - Corrective Action (General)	140 days	Mon 1/1/24	Fri 7/12/24	[Summary bar]																										
17	Semi-Annual Progress Report Prep/Submittal for 2nd Half of 2023	11 days	Mon 1/1/24	Mon 1/15/24	[Task bar]																										
18	Semi-Annual Progress Report Prep/Submittal for 1st Half of 2024	10 days	Mon 7/1/24	Fri 7/12/24	[Task bar]																										
19	CA Summary Addendum Generation	TBD			[Task bar]																										
20	Updated Site GMP Generation and Submittal	TBD			[Task bar]																										
21	Operation & Maintenance Manual (OMM) Generation and Submittal	TBD			[Task bar]																										
22	Additional RCRA Corrective Action final decision process support activities	TBD			[Task bar]																										
23	Task 3 - Corrective Measures Institutional Controls				[Summary bar]																										
24	DRC attachment support	TBD			[Task bar]																										
25	Task 4 - Corrective Measures - Soil	260 days	Tue 1/2/24	Fri 12/27/24	[Summary bar]																										
26	CA Investigation Continued if Needed	TBD			[Task bar]																										
27	Allowance for additional soil investigations	TBD			[Task bar]																										
28	Fiero Soil Gas Sampling	260 days	Tue 1/2/24	Fri 12/27/24	[Task bar]																										
29	Task 5 - Corrective Measures - GW / LNAPL	261 days?	Tue 1/2/24	Mon 12/30/24	[Summary bar]																										
30	Continued Well Repair, Protection and Abandonment Activities	130 days	Wed 7/3/24	Mon 12/30/24	[Task bar]																										
31	USPS LNAPL Well Abandonment and Reporting	TBD			[Task bar]																										
32	Fiero Monitoring, Data Evaluation and Reporting	261 days?	Tue 1/2/24	Mon 12/30/24	[Task bar]																										
33	Joslyn Groundwater Monitoring, Data Evaluation and Reporting (Not CA)	5 days	Mon 10/28/24	Fri 11/1/24	[Task bar]																										
34	Task 6 - Groundwater Monitoring and Other O&M	75 days?	Tue 9/17/24	Mon 12/30/24	[Summary bar]																										
35	Annual Groundwater Sampling	5 days	Mon 10/7/24	Fri 10/11/24	[Task bar]																										
36	Preparation of 2023 and 2024 Annual GW Report	56 days	Mon 10/14/24	Mon 12/30/24	[Task bar]																										
37	Annual Inspections	2 days?	Tue 9/17/24	Wed 9/18/24	[Task bar]																										
38	Annual Inspection Report 2023 and 2024	21 days?	Mon 12/2/24	Mon 12/30/24	[Task bar]																										
39	Task 7 - Storm Sewers (Seep)	264 days?	Mon 1/1/24	Wed 1/1/25	[Summary bar]																										
40	Montcalm Seep Control System OMM	264 days?	Mon 1/1/24	Wed 1/1/25	[Task bar]																										
41	Task 31 - PFAS Characterization	TBD			[Task bar]																										
42	Additional PFAS Characterization	TBD			[Task bar]																										
43	Task 32: PFAS Risk/Exposure Pathway Analysis				[Summary bar]																										
44	Risk/Exposure Pathway Analysis Report	TBD			[Task bar]																										
45	Task 34: PFAS Pilot Test	TBD			[Task bar]																										
46	Task 35: PFAS Final System Design	TBD			[Task bar]																										

RACER PNC/Fiero 2022 Schedule
Date: Fri 1/12/24

Task		Summary		External Milestone		Inactive Summary		Manual Summary Rollup		Finish-only	
Split		Project Summary		Inactive Task		Manual Task		Manual Summary		Progress	
Milestone		External Tasks		Inactive Milestone		Duration-only		Start-only		Deadline	