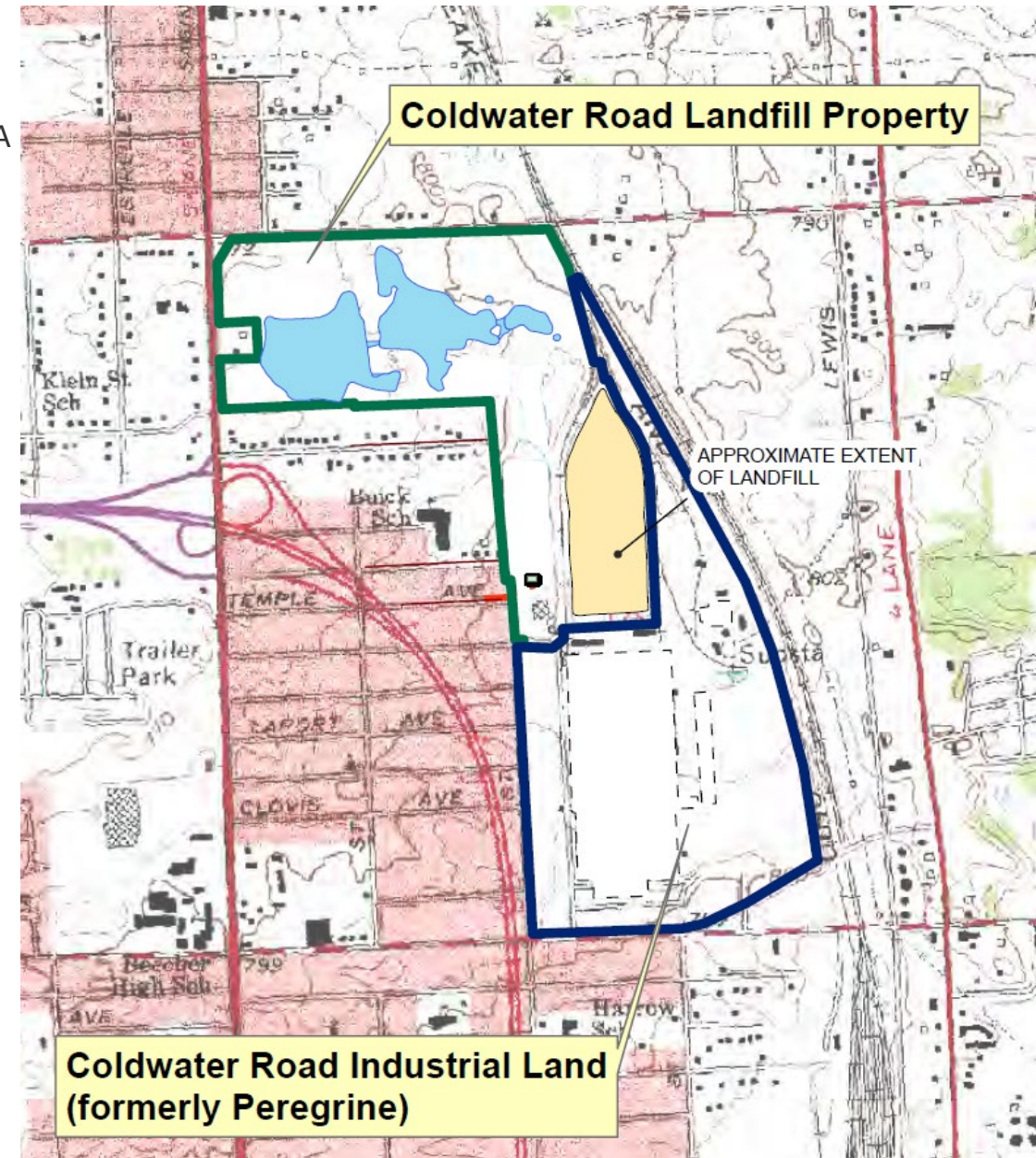


RACER TRUST
COLDWATER ROAD SITE
PFAS ACTIVITY PROGRESS
REPORT – April 11, 2025

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), 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 have included replacement of one residential well and continued 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

- Given the treatment units have consistently removed PFOS to below drinking water levels and PFAS results in the untreated well water have remained stable at 1278 E. Stanley Road and 1320 E. Stanley Rd. since sampling began in 2018, we requested approval to change the sample frequency from quarterly to occur on a semiannual basis during the fourth quarter 2024. The request was approved by EGLE via letter on March 17, 2025.
- Samples were collected from private wells at 1278 E. Stanley Road and 1320 E. Stanley Road on March 26, 2025. The whole house filter at 1278 E. Stanley Road was changed out after the sample collection during this event. The results are still pending and once received the letters to the residents will be prepared.
- The post-treatment results were non-detect for PFAS. PFOS continues to be the primary PFAS detected in the raw (untreated) water at both locations. The raw water results during the October event at 1278 E. Stanley Rd. was above its Michigan drinking water criteria and within the range of previously detected concentrations. The results have been shared with EGLE, Genesee County Health Department, Michigan Department of Health and Human Services, and the residents. It's our understanding that the newly enacted federal 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.

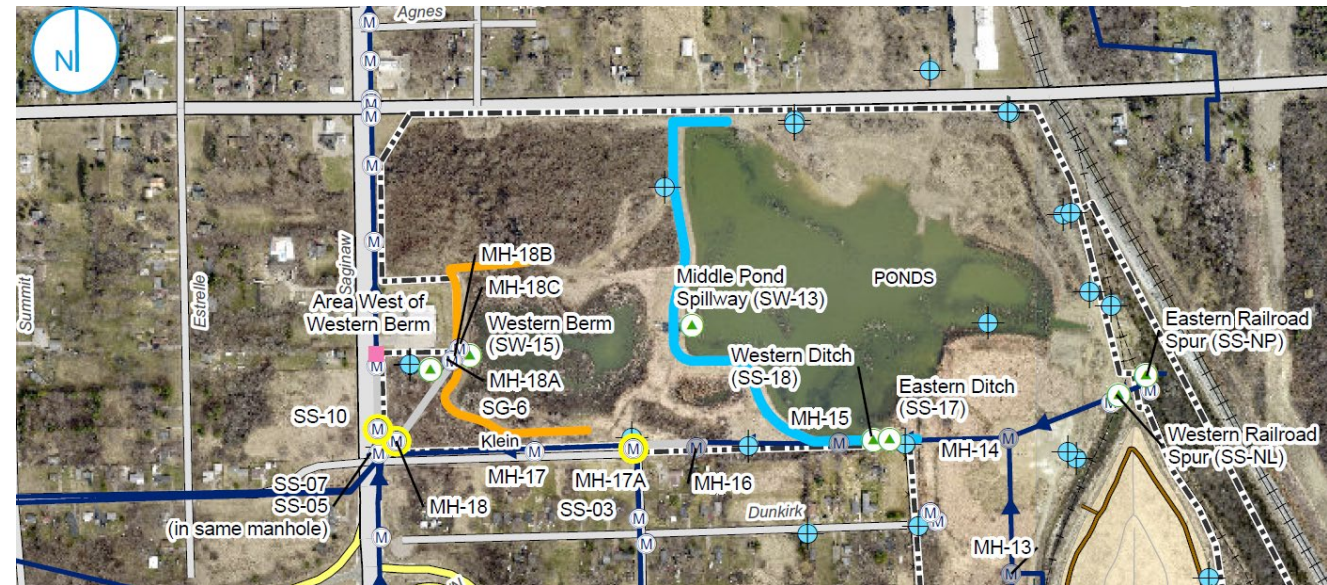


PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER – Pond Management

- A temporary PFAS treatment system is currently scheduled to remobilize the week of April 14, 2025 to remove PFOS prior to discharge to the municipal 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.
- A pilot-scale study will be conducted concurrently with the spring 2025 dewatering event to evaluate the adsorption capacity/performance of FLUORO-SORB®. FLUORO-SORB® is a proprietary, NSF-certified product developed and sold by CETCO that is designed to bind the entire spectrum of PFAS efficiently and in a wide variety of removal and remediation processes.
- Continued evaluation of a stationary treatment system concept, including bench-scale laboratory studies, if appropriate.

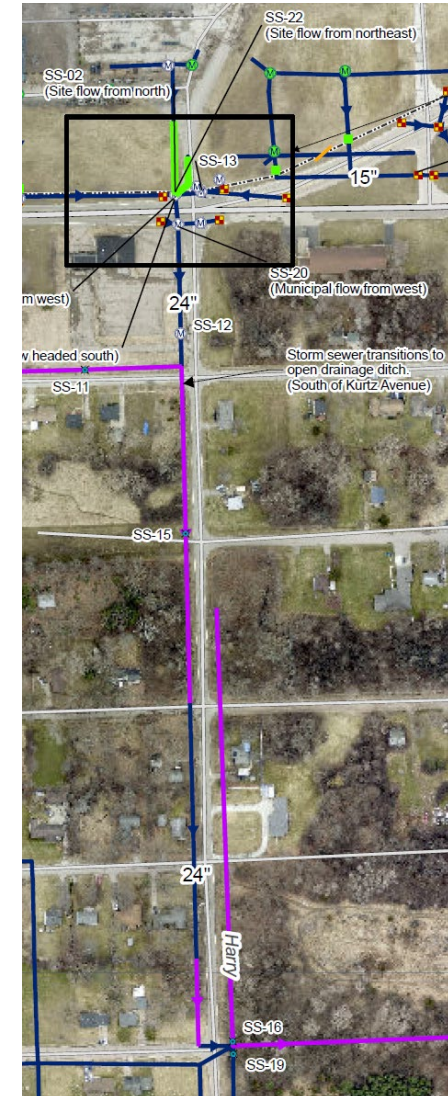
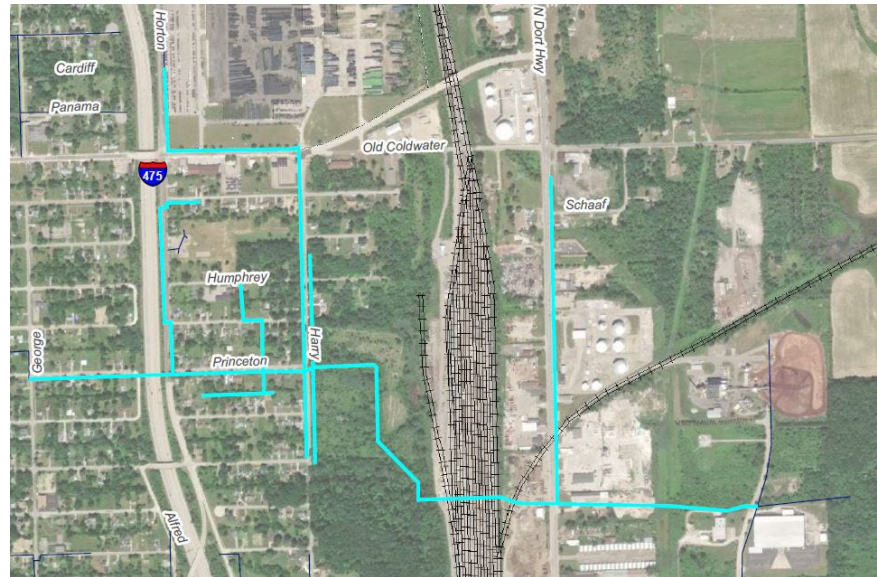
- ⊕ MONITORING WELL / PIEZOMETER
- M STORM SEWER MANHOLE
- Ⓜ MANHOLE ABANDONED AND PLUGGED
- Ⓜ STORM SEWER SAMPLE LOCATION TO BE SAMPLED
- ▲ SURFACE WATER SAMPLE LOCATION
- CATCH BASIN
- STORM SEWER PIPE PLUG
- STORM SEWER
- SEALED STORM SEWER
- - - PROPERTY BOUNDARY
- ▭ FORMER BUILDING
- COMPLETED BERM
- MIDDLE POND BERM - ELEV. 792.5



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER - Sewers

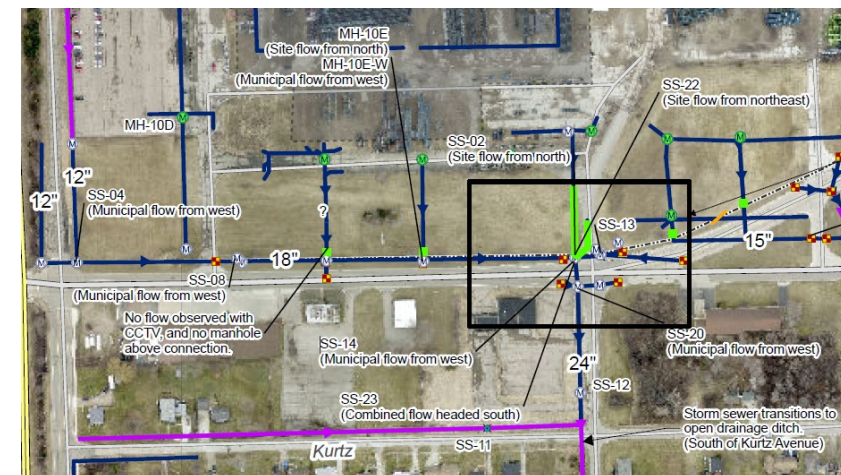
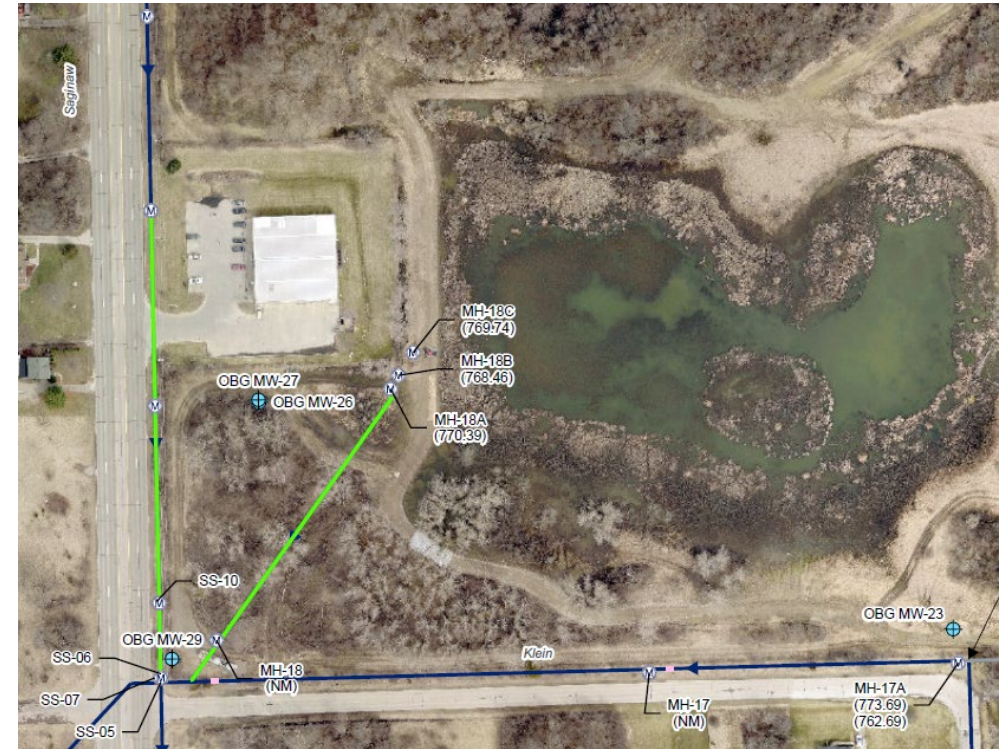
- Continued observation and evaluation of storm sewers south of the Site and along Saginaw Road. A South and West of Site Storm Sewer Evaluation Update summarizing the October 2024 sample results was submitted to EGLE on January 10, 2025.
- Collected storm water samples from off-Site sewer lines on March 20, 2025. The results are still pending and once received a memo summarizing the results will be submitted.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

STORM WATER - Inspection

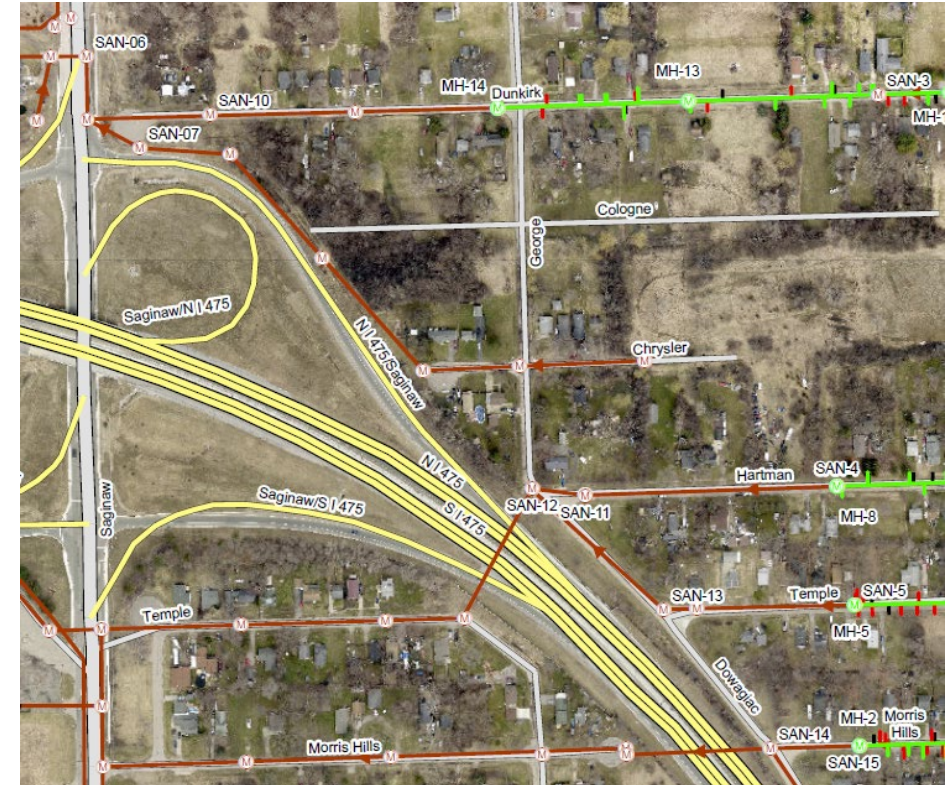
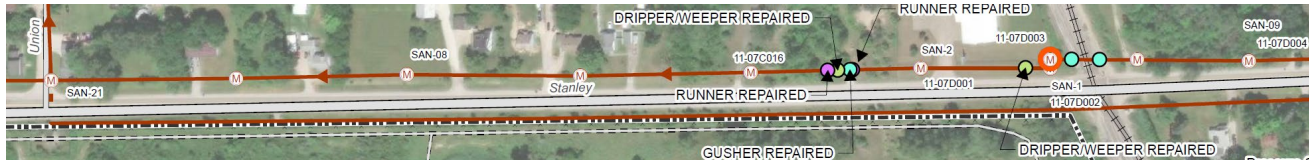
- ❑ The first quarter 2025 storm water inspection was conducted on March 20, 2025, observations include:
 - No uncontrolled discharge from the ponds to off-site or overtopping of berms was observed.
 - Water was flowing from the west railroad spur, and from the railroad spur east of the landfill. The railroad spurs convey stormwater to the culvert/swale, which empties into the Middle Pond.
 - No 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 located near the intersection of East Klein St and George St 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 located along the north side of Coldwater Rd since the storm water pipe leading to the outfall was plugged.
 - No dripping was observed from the plugs at SS-02 located along the north side of Coldwater Rd since the storm water pipe from the Site was plugged.
 - The storm water inspection summary matrix will be included along with the March sampling results memo.



PFAS INVESTIGATIONS/EVALUATIONS/CORRECTIVE MEASURES

□ SANITARY SEWERS

- A Stanley Road Sanitary Sewer Update Letter summarizing the December 2024 sample results was submitted to EGLE and Genesee County Water and Waste Services on March 20, 2025. Samples from the sanitary sewer manholes along Stanley Road (11-07C016, SAN-2, SAN-08, SAN-09, & SAN-21) are scheduled to be sampled again in June 2025.
- A West of Site Sanitary Sewer Update Letter summarizing the December 2024 sample results was submitted to EGLE and Beecher Metropolitan District on March 20, 2025. Samples from the sanitary sewer manholes west of the Site (SAN-06, SAN-12, & SAN-14) are scheduled to be sampled again in June 2025.



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

Activity	Schedule
PFAS Monitoring:	
➤ Submit private well sample results	April
➤ Prepare and submit summary of storm water inspection and sampling results south and west of Site	May
➤ Collect additional round of samples from the Stanley Road sanitary sewer	June
➤ Collect additional round of samples from West of the Site sanitary sewers	June
➤ Collect additional round of samples from South of Site storm sewers	June
➤ Inspect storm water features and sample (SS-17A & SS-02), if flow is observed	June
➤ Annual PFAS Groundwater Sampling Event	June
➤ Record surface water levels (Western & Middle Ponds)	Recorded Daily
➤ Sample residential wells (1278 & 1320 E. Stanley Road)	June
PFAS Corrective Measures:	
➤ Operate temporary treatment system for discharge from Western/Middle Ponds	Tentatively scheduled to start April 16, 2025
➤ Continue evaluation of a stationary treatment system concept	To be Determined.