

SUBJECT

RACER Trust Pontiac North Campus Additional RCRA Investigation Scope of Work (Third Phase)

TO

Jennifer Stanhope - USEPA

DATE

September 15, 2025

OUR REF

RACER Trust Pontiac North Campus

DEPARTMENT

Environment

PROJECT NUMBER

30267726

COPIES TO

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This proposed scope of work is for additional RCRA Investigation efforts to further delineate impacts detected during previous investigation activities conducted in October 2024, November 2024, and May 2025. Impacts present within the Southern Metal Fabrication Division and Northern Metal Fabrication Division of the Site have not been delineated to date and require additional investigation. Additional delineation locations proposed were shared with USEPA during the July 17, 2025 Site Update Meeting. Below is a written scope of work and additional supporting information. All work will be completed following protocols provided in the Initial Scope of Work for these investigations approved by USEPA via email transmittal on November 3, 2023 (*Pontiac North Campus – Supplemental RCRA Facility Investigation Scope of Work – Draft* submitted on September 26, 2023, and Final report dated November 28, 2023). The following scope of work includes the completion of step out borings from the most recently completed investigation locations advanced in May 2025.

Southern Metal Fabrication Division (Figure 1)

Additional polychlorinated bi-phenyl (PCB) evaluation in the vicinity of monitoring well MWW1-04:

- A total of 7 step-out soil borings will be completed to delineate the PCB exceedances around monitoring well MWW1-04.
- Soil borings will be completed approximately 20 feet from most recent investigation borings that exceeded TSCA Criteria. This distance is being applied in an effort to achieve lateral delineation.
- Soil borings will be completed to approximately 8 feet below ground surface (bgs) or to the top of the water table (encountered from 4.5-5.5 feet bgs last investigation at most borings) and soil will be analyzed for PCBs.
- Sample intervals will be consistent with previous events: 1.5-2.5 ft bgs, 2.5-3.5 ft bgs, 4.5-5.5 ft bgs and 6.5 bgs to the top of the water table (historically encountered up to 6.5-8 feet bgs). Depending on the depth to water the sampling intervals may be altered – such as if groundwater is encountered at 6.5 feet bgs a soil sample will then be collected from 5.5-6.5 feet bgs.

Note that groundwater collected from MWW1-04 in October 2021 was non-detect for PCBs, a detection of 0.2 microgram per liter (ug/L) was observed in September 2022, and a detection of 0.1 ug/L was observed in September 2023.

Northern Metal Fabrication Division (Figure 2)

Additional PCB evaluation in the vicinity of MWM30-01:

- A total of 7 step-out soil borings will be completed to delineate PCBs in soil around MWM30-01.
- Soil borings will be advanced approximately 20 feet from most recent investigation borings that exceeded TSCA Criteria. This distance is being applied in an effort to achieve lateral delineation. Additionally, the northern set of proposed locations may need to be moved further north inside the fence line of the U-Save and Pull property based on a slope in the concrete and utilities in the area. The safest area to advance the locations will be evaluated in the field during the utility locate activities.
- Soil borings will be completed to approximately 5 feet below ground surface. Considering the slope of the grade to the north borings in that direction will be extended to the depth needed to collect samples from the same approximate elevations as collected during the most recent investigation..
- Sample intervals will be consistent with previous events: 0-1 ft bgs, 2-3 ft bgs, and 4-5 ft bgs, except the northern locations where samples will be collected from the same approximate elevations as collected during the most recent investigation.

Former Fiero Properties (Figure 3)

Additional naphthalene evaluation was completed in the vicinity of MWF12-01 at the Fiero Former Powerhouse Property in May 2025. Soil borings were advanced in the right of way (ROW) to show that impacts are not present there (non-detect for naphthalene). However, it should be noted that during the November 2024 investigation soil boring MWF12-01RE2W was moved slightly north of its original location due to drill rig access issues and vegetation cover. Additionally, MWF12-01 was sampled on March 20, 2025 and naphthalene was not detected in groundwater. Therefore, no further investigation is warranted for this area of the Site.

Schedule

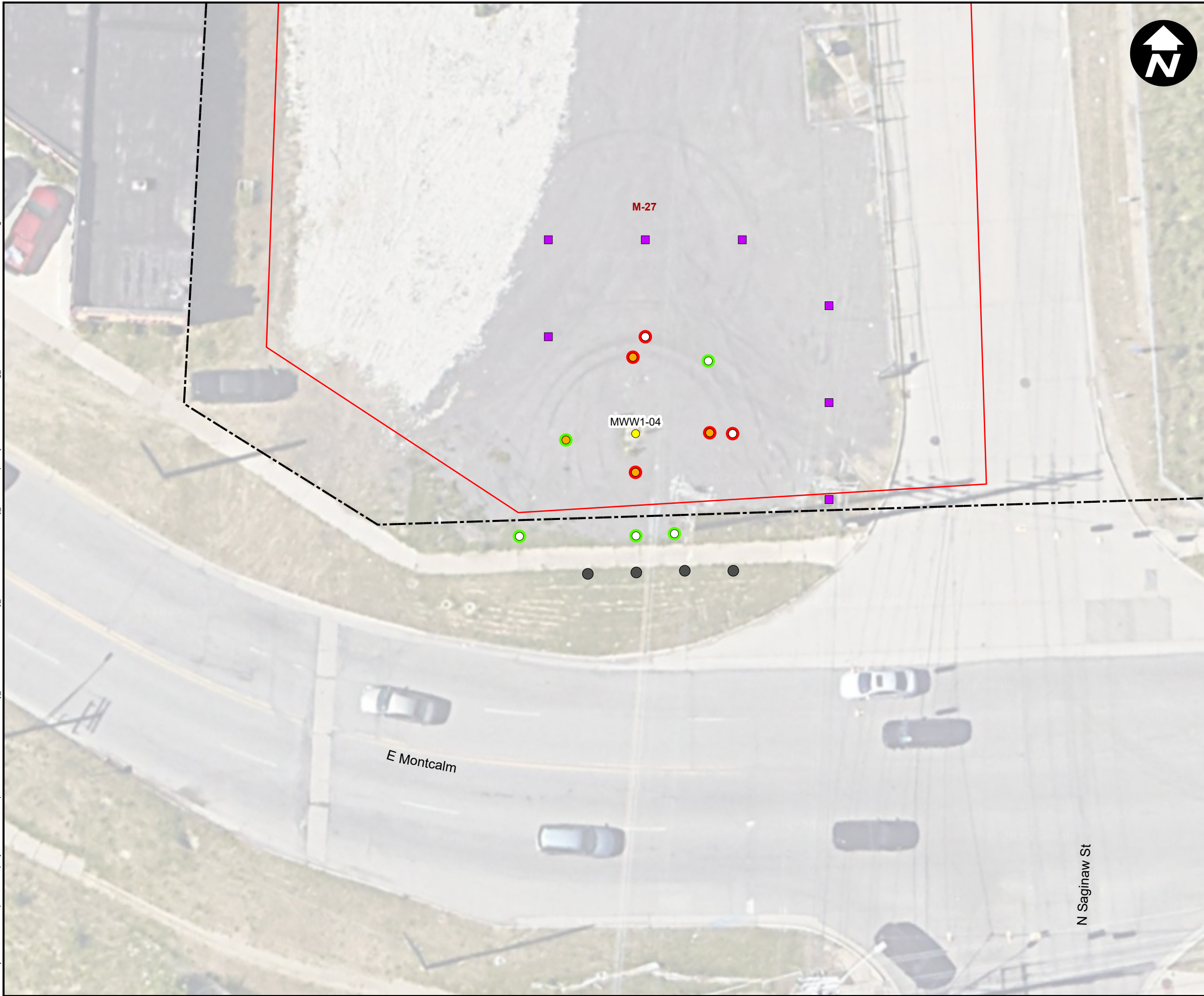
The field work for areas requiring additional investigation is scheduled to be completed on September 22nd, 2025 and will commence once USEPA approval is provided. A review of the additional data collected during this investigation (Third Phase) will be completed and discussed with USEPA during a regularly scheduled monthly update call for the Site. A summary report of the investigation activities will be completed and submitted to USEPA.

Enc. Figure 1 – Southern Metal Fabrication Division Proposed Borings

Figure 2 - Northern Metal Fabrication Division Proposed Borings

Figure 3 – RCRA Soil Investigation Summary-Former Fiero Properties

D:\GIS\Project Files\Motors Liquidator\Company\PontiacNorth Campus\Documents\SoilDataSummary_2001-2023\SoilDataSummary_2001-2023.aprx Layout: CA Phase III Drilling_01PLOTTED: 9/11/2025 4:46 PM BY: T.Yarborough



LEGEND

- PROPOSED STEP-OUT BORING LOCATIONS
- RE-SAMPLE LOCATION
- FIRST ROUND STEP-OUT LOCATIONS - OCTOBER 2024 AND NOVEMBER 2024
- SECOND ROUND STEP-OUT BORING LOCATIONS - MAY 2025
- STEP-OUT LOCATIONS SAMPLED BUT ANALYSIS NOT PERFORMED
- SAMPLE RESULTS EXCEEDS TCSCA CRITERIA
- SAMPLE RESULTS BELOW TCSCA CRITERIA
- AREAS OF INTEREST
- CURRENT OR FORMER RACER PROPERTY BOUNDARIES
- TSCA TOXIC SUBSTANCES CONTROL ACT

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**SOUTHERN METAL FABRICATION
DIVISION PROPOSED BORINGS**





LEGEND

- PROPOSED STEP-OUT BORING LOCATIONS
- RE-SAMPLE LOCATION
- FIRST ROUND STEP-OUT LOCATIONS - OCTOBER 2024
- SECOND ROUND STEP-OUT BORING LOCATIONS - MAY 2025
- SAMPLE RESULTS BELOW TCSCA CRITERIA
- SAMPLE RESULTS EXCEEDS TCSCA CRITERIA
- AREAS OF INTEREST
- CURRENT OR FORMER RACER PROPERTY BOUNDARIES

TCSCA TOXIC SUBSTANCES CONTROL ACT

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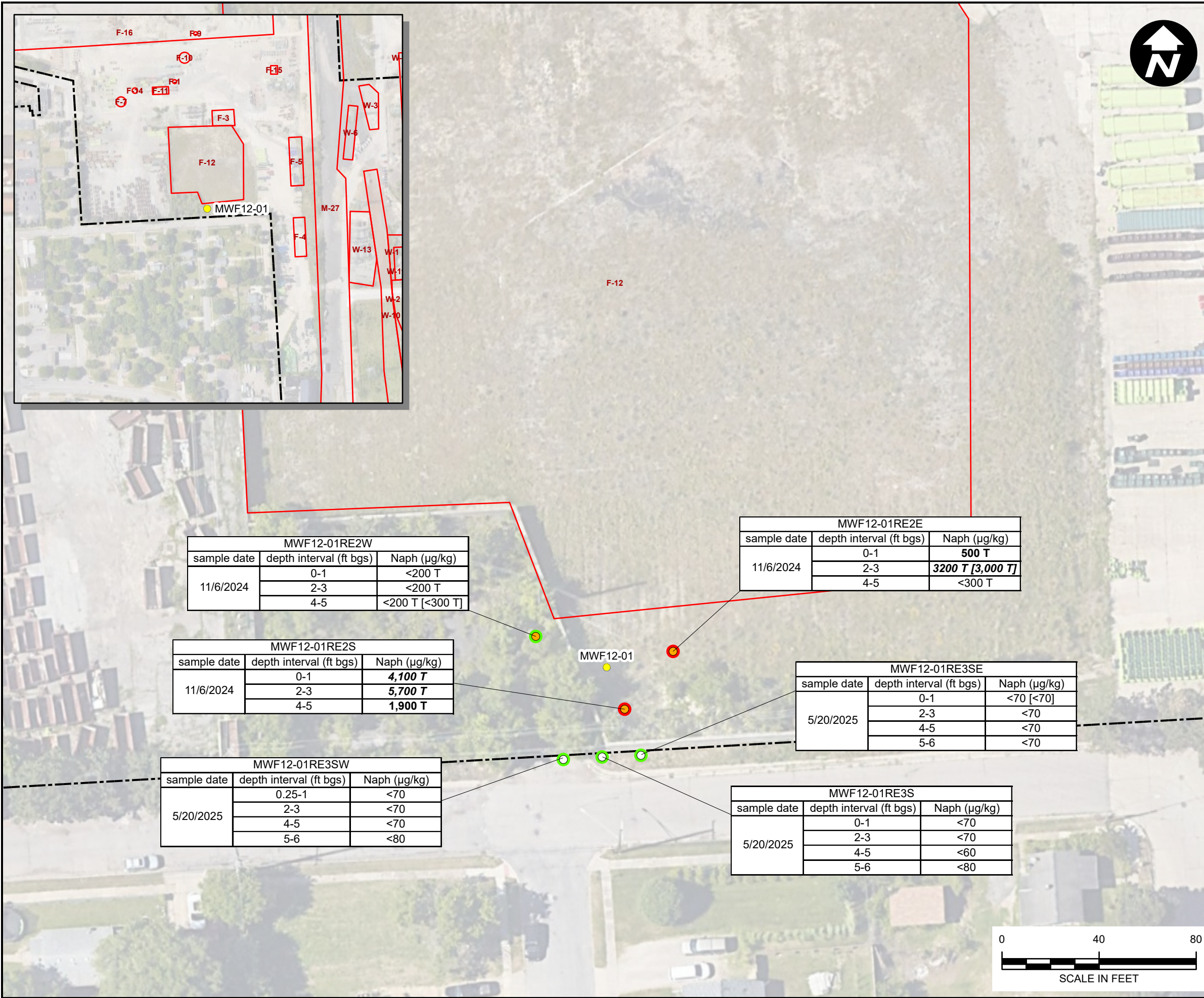


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**NORTHERN METAL FABRICATION
DIVISION PROPOSED BORINGS**



FIGURE
2



- LEGEND**
- RE-SAMPLE LOCATION
 - FIRST ROUND STEP-OUT LOCATIONS - NOVEMBER 2024
 - SECOND ROUND STEP-OUT BORING LOCATIONS - MAY 2025
 - SAMPLE RESULTS EXCEED RES AND/OR NON-RES SSVIAC CRITERIA
 - SAMPLE RESULT BELOW RES AND NON-RES SSVIAC CRITERIA
 - AREAS OF INTEREST
 - CURRENT OR FORMER RACER PROPERTY BOUNDARIES

Compound	Unit	Res Fiero SSVIAC SOG	Res Fiero SSVIAC BASE	NR Fiero SSVIAC <50k SOG	NR Fiero SSVIAC <50k BASE	NR Fiero SSVIAC >50k SOG	NR Fiero SSVIAC >50k BASE
Naphthalene	ug/kg	67	67	3,800	2,500	5,700	3,800

- µg/kg MICROGRAMS PER KILOGRAM
- < NON-DETECT
- <50k LESS THAN 50,000 SQUARE FEET
- >50k GREATER THAN 50,000 SQUARE FEET
- BASE BASEMENT SCENARIO
- bgs BELOW GROUND SURFACE
- ft FEET
- NR NONRESIDENTIAL
- Res RESIDENTIAL
- SOG SLAB-ON-GRADE SCENARIO
- SSVIAC SITE-SPECIFIC VOLATILIZATION TO INDOOR AIR CRITERIA
- U COMPOUND ANALYZED FOR BUT NOT DETECTED ABOVE THE REPORTING LIMIT
- T NO CORRECTION FOR TOTAL SOLIDS

- NOTES:**
- 1) CRITERIA LISTED ARE FROM THE MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY (EGLE) CLEAN UP CRITERIA REQUIREMENTS TABLE 2: RESIDENTIAL SOIL CRITERIA, TABLE 3: NONRESIDENTIAL SOIL CRITERIA, PART 201 GENERIC CLEANUP CRITERIA AND SCREENING LEVELS, DECEMBER 21, 2020.
 - 2) CRITERIA LISTED ARE FROM THE EGLE FORMER FIERO ASSEMBLY SITE-SPECIFIC CRITERIA EVALUATION DATED APRIL 21, 2020.
 - 3) BOLD VALUES INDICATE AN EXCEEDANCE OF THE RESIDENTIAL CRITERIA.
 - 4) BOLD AND ITALIC VALUES INDICATE AN EXCEEDANCE OF THE NONRESIDENTIAL CRITERIA.
 - 5) SAMPLES ANALYZED FOR NAPHTHALENE VIA UNITES STATES ENVIRONMENTAL PROTECTION AGENCY METHOD SW5035A.

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MWF12-01RE2W		
sample date	depth interval (ft bgs)	Naph (µg/kg)
11/6/2024	0-1	<200 T
	2-3	<200 T
	4-5	<200 T [<i><300 T</i>]

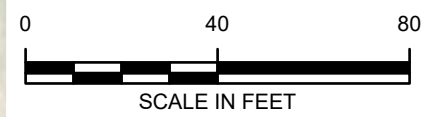
MWF12-01RE2E		
sample date	depth interval (ft bgs)	Naph (µg/kg)
11/6/2024	0-1	500 T
	2-3	3200 T [3,000 T]
	4-5	<300 T

MWF12-01RE2S		
sample date	depth interval (ft bgs)	Naph (µg/kg)
11/6/2024	0-1	4,100 T
	2-3	5,700 T
	4-5	1,900 T

MWF12-01RE3SE		
sample date	depth interval (ft bgs)	Naph (µg/kg)
5/20/2025	0-1	<70 [<i><70</i>]
	2-3	<70
	4-5	<70
	5-6	<70

MWF12-01RE3SW		
sample date	depth interval (ft bgs)	Naph (µg/kg)
5/20/2025	0.25-1	<70
	2-3	<70
	4-5	<70
	5-6	<80

MWF12-01RE3S		
sample date	depth interval (ft bgs)	Naph (µg/kg)
5/20/2025	0-1	<70
	2-3	<70
	4-5	<60
	5-6	<80



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**RCRA SOIL INVESTIGATION
SUMMARY - FORMER FIERO PROPERTIES**