

Mr. Peter Ramanauskas  
U.S. Environmental Protection Agency Region 5  
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Date: July 15, 2023  
Our Ref: 30167840

Subject: Semi-Annual Progress Report, January 2023 – June 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,

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 January 1, 2023 through June 30, 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 January 1, 2023 through June 30, 2023

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

- Submitted July-December 2022 Semi-Annual Progress Report to USEPA on January 15<sup>th</sup>, 2023.
- Finalized the In Situ Chemical Reduction with Zero Valent Iron Pilot Study Workplan on January 4<sup>th</sup>, 2023.
- Prepared and submitted Draft In Situ Chemical Reduction with Zero Valent Iron Pilot Study Installation Summary on January 30, 2023. The finalized report was submitted on March 20<sup>th</sup>, 2023.
- Revised and submitted the Draft CA Summary Report to USEPA on February 10, 2023.
- Prepared and submitted the final 2021-2022 Fiero Site Investigation Summary on February 23, 2023.
- Montcalm seep pump was replaced on February 23, 2023.
- Planned and completed first quarter groundwater and soil vapor monitoring at Former Fiero properties from March 6<sup>th</sup> – 8<sup>th</sup>, 2023. Prepared and submitted 2023 Fiero Temporary Monitoring Plan 1Q Results Memo on June 13, 2023. Planned and completed second quarter groundwater and soil vapor monitoring from June 5<sup>th</sup> – 12<sup>th</sup>, 2023.
- During Fiero first quarter sampling, MW-16-22 was found to be in a low area covered by water and unable to be sampled. On March 29<sup>th</sup>, 2023, MW-16-22 was converted to a stick-up well and re-developed. Four

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concrete bollards were placed around the well for protection. MW-16-22 was sampled during the first quarter Fiero monitoring on April 7<sup>th</sup>, 2023.

- Planned and completed first quarter Joslyn groundwater sampling from March 6<sup>th</sup> – 14<sup>th</sup>. Second quarter Joslyn groundwater sampling was completed from June 19<sup>th</sup> – 22<sup>nd</sup>. First and second quarter Joslyn results will be submitted to USEPA in a memo when completed.
- Prepared and submitted 2023 Revised Fiero Temporary Monitoring Plan on April 4, 2023.
- Prepared and submitted RW-08-14 LNAPL System Decommission Memo on April 12, 2023.
- Prepared and submitted Initial PFAS Sampling Plan on April 18, 2023. Planned and completed initial PFAS groundwater sampling from April 24<sup>th</sup> – May 2<sup>nd</sup>, 2023.
- Prepared and submitted 2022 Fiero Temporary Groundwater Monitoring Plan Summary on April 21, 2023.
- Prepared and submitted 2022 Joslyn South Parcel Groundwater and Soil Investigation Summary Report on May 5, 2023.
- Continued work on revising the CA Summary Report per USEPA comments on the February 2023 version received on April 12, 2023.
- Continued work on the 2022 Annual Groundwater Monitoring Report.
- Continued work on 2022 Annual Property Inspection Report.
- Conducted routine O&M associated with the Montcalm Street Seep Control System from January through June 2023; seepage of groundwater from the Site onto Montcalm Street continues to be prevented during this timeframe.
- 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.

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% |

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- 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%
- 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%
- Revised Draft CA Summary Report, including Data Re-Screening (2/10/23) 100%
- Responses to additional USEPA Comments on Draft CA Summary Report (In Progress) 90%
- Revised CA Summary Report, based on USEPA comments received 4/12/23 (In Progress) 90%

**Corrective Measures – Institutional Controls**

- Declaration of Restrictive Covenants (DRCs) recorded for all Site parcels 60%
- Recorded USEPA and MDEQ 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%

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- 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%

**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%
- 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%

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- 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 7/7/23) 100%
- 2022 RACER Pontiac North Campus Water Well Survey (Draft 6/24/22) 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%

#### **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%

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- Proposed Fiero Well Abandonment Memo (4/08/22) 100%
- RACER Pontiac North Campus 2021 Property Inspection Report (4/15/22) 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 (In Progress) 90%
- 2022 Property Inspection Report (In Progress) 90%
- 2023 Fiero Temporary Monitoring Plan 1Q Results Memo (6/13/23) 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%
- 2022 Fiero Temporary Groundwater Monitoring Plan Summary (4/21/23) 100%
- 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%
- 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 9 samples collected results in 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%

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- 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 (In Progress) 70%

**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) 100%  
USEPA approved No Further Action with a condition requiring a DRC (9/29/2021)
- 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%

Project Schedule – Work to be Completed During Next Reporting Period

An updated task-based Gant chart for the 2023 Project Schedule is attached. Items scheduled to be completed during the next reporting period:

- Submittal of the Revised CA Summary Report incorporating USEPA’s April 2023 comments
- Submittal of 2022 Annual Groundwater Monitoring Report
- Submittal of 2022 Annual Property Inspection Report
- Submittal of PFAS Investigation Summary Memo and Supplemental Sampling Plan

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- Complete Supplemental PFAS Sampling following USEPA approval
- Submittal of Fiero 3Q and 4Q Data Packages
- Submittal of Joslyn Semi-annual Data Packages (1Q and 2Q and 3Q and 4Q 2022)
- Submittal of CA Summary Data Gap Work Plan
- Complete CA Summary Data Gap Investigation following USEPA approval
- Complete Annual Groundwater Monitoring Event
- Complete Annual Property Inspection
- Provide support to USEPA and initiate updates to other RCRA decision process documents as determined appropriate
- Support development and finalization of deed restrictions for the Site
- Continue with Joslyn groundwater monitoring at a frequency described in the Summary Report submittal
- Submit a request to USEPA to abandon historical LNAPL wells at the USPS Property
- Complete quarterly soil vapor and groundwater monitoring for Fiero temporary monitoring plan and ZVI Pilot Test
- 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.
- 2023 Budget Amendment submittal to address certain PFAS related items for budget tracking purposes.
- Continue Montcalm Seep Control System IMWP OMM
- Respond to any comments received from USEPA or EGLE on submittals or other matters

#### Problems Encountered

No problems were encountered during the reporting period. However, it should be noted that as of December 2022 the Former Plant 14S (Tatro Property) was sold, changing ownership from Tatro Michigan Land Holdings to Deeberry.

Should you have any questions on the information provided within this progress report, please feel free to contact David Favero with RACER Trust at [dfavero@racertrust.org](mailto:dfavero@racertrust.org) or 217-741-6235 or me.

Sincerely,  
Arcadis of Michigan, LLC



Tiffany A. Linder  
Certified Project Manager

Email: [tiffany.linder@arcadis.com](mailto:tiffany.linder@arcadis.com)  
Direct Line: 810 225 1928

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

Enclosures:

**Attachment**

1 2023 Project Schedule

# Attachment 1

**2023 Project Schedule**

ID	Task Name	Duration	Start	Finish	12/25	January 1		February 1		March 1		April 1		May 1		June 1		July 1		August 1		September 1		October 1		November 1		December 1				
						1/8	1/22	2/5	2/19	3/5	3/19	4/2	4/16	4/30	5/14	5/28	6/11	6/25	7/9	7/23	8/6	8/20	9/3	9/17	10/1	10/15	10/29	11/12	11/26	12/10	12/24	
1	<b>Task 1 - Project Management</b>	264 days	Sun 1/1/23	Sun 12/31/23	[Summary Bar]																											
2	<b>Monthly PM Activities</b>	264 days	Sun 1/1/23	Sun 12/31/23	[Summary Bar]																											
15	Prepare, Submit & Obtain Approval of 2024 Budget Authorization	64 days	Mon 9/4/23	Wed 11/29/23	[Blue Bar]																											
16	<b>Task 2 - Corrective Action (General)</b>	264 days?	Sun 1/1/23	Sun 12/31/23	[Summary Bar]																											
17	Semi-Annual Progress Report Prep/Submittal for 1st Half of 2023	10 days	Mon 7/3/23	Fri 7/14/23	[Blue Bar]																											
18	CA Summary Data Gap Investigation	TBD			[Blue Bar]																											
19	Revise CA Summary Report Based on EPA Comments	6 days	Mon 7/24/23	Mon 7/31/23	[Blue Bar]																											
20	Additional RCRA Corrective Action final decision process support activities	TBD			[Blue Bar]																											
21	<b>Task 3 - Corrective Measures Institutional Controls</b>				[Summary Bar]																											
22	DRC attachment support	TBD			[Blue Bar]																											
23	<b>Task 4 - Corrective Measures - Soil</b>	264 days	Sun 1/1/23	Sun 12/31/23	[Summary Bar]																											
24	Allowance for additional soil investigations	TBD			[Blue Bar]																											
25	Quarterly Fiero Soil Gas Sampling	131 days	Mon 7/3/23	Fri 12/29/23	[Blue Bar]																											
26	<b>Task 5 - Corrective Measures - GW / LNAPL</b>	264 days?	Sun 1/1/23	Sun 12/31/23	[Summary Bar]																											
27	South Joslyn-Wesbrook Property Allowance for additional GW Investigations (not CA)	TBD			[Blue Bar]																											
28	Continued Well Repair, Protection and Abandonment Activities	130 days	Wed 7/5/23	Sun 12/31/23	[Blue Bar]																											
29	USPS LNAPL Well Abandonment and Reporting	TBD			[Blue Bar]																											
30	Fiero ZVI Pilot Monitoring, Data Evaluation and Reporting	261 days?	Tue 1/3/23	Fri 12/29/23	[Blue Bar]																											
31	Completion of Updated Groundwater Monitoring Plan and O&M Plan	TBD			[Blue Bar]																											
32	<b>Task 6 - Groundwater Monitoring and Other O&amp;M</b>	264 days?	Sun 1/1/23	Sun 12/31/23	[Summary Bar]																											
33	Finalize & Submit 2022 Annual GW Report and 2022 Annual Inspection Report	153 days?	Sun 1/1/23	Mon 7/31/23	[Blue Bar]																											
34	Annual Groundwater Sampling	5 days	Mon 10/9/23	Fri 10/13/23	[Blue Bar]																											
35	Preparation of 2023 Annual GW Report	56 days	Mon 10/16/23	Sun 12/31/23	[Blue Bar]																											
36	Annual Inspections	2 days?	Tue 9/19/23	Wed 9/20/23	[Blue Bar]																											
37	Annual Inspection Report 2023	21 days?	Mon 12/4/23	Sun 12/31/23	[Blue Bar]																											
38	<b>Task 7 - Storm Sewers (Seep)</b>	264 days?	Sun 1/1/23	Sun 12/31/23	[Summary Bar]																											
39	Obtain NPDES Permit for Discharge	TBD			[Blue Bar]																											
40	Sewer Connection Tie-In Design and City of Pontiac Approval	TBD			[Blue Bar]																											
41	Sewer Connection Tie-In Installation	TBD			[Blue Bar]																											
42	Evaluations of other options if NPDES permit is not obtained	TBD			[Blue Bar]																											
43	Montcalm Seep Control System OMM	264 days?	Sun 1/1/23	Sun 12/31/23	[Teal Bar]																											
44	<b>Task 30 - Initial Groundwater Screening for PFAS</b>	176 days	Sun 1/1/23	Thu 8/31/23	[Teal Bar]																											
45	<b>Task 31 - Initial PFAS Characterization</b>	67 days	Sun 10/1/23	Sun 12/31/23	[Teal Bar]																											

RACER PNC/Fiero 2022 Schedule  
Date: Fri 7/14/23

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