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Our ref: 12573440-LTR-22

January 15, 2026

Ms. Jennifer Stanhope, P.E.
Remediation Branch
Land, Chemicals, and Redevelopment Division
U.S. EPA Region 5
77 West Jackson Blvd., LR-16J
Chicago, Illinois 60604-3590

2nd 2025 Semi-Annual Progress Report
Performance Based Administrative Order on Consent
Docket Number RCRA 05 2011 0025
Eckles Road Site, Livonia, Michigan
USEPA ID No. MID 005 356 621

Dear Ms. Stanhope:

In accordance with the Performance Based Administrative Order on Consent between the U.S. Environmental Protection Agency Region 5 (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the 2nd half of 2025 (July 1, 2025, through December 31, 2025).

Please let us know if you would like to discuss further. Thank you.

Regards,

A handwritten signature in blue ink, appearing to read "Chris Meincke", with a stylized flourish at the end.

Chris Meincke
Associate

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CJM/lg/22/S4

Encl: Attachment A – 2nd 2025 Semi-Annual Progress Report

Copy to: Sam Cairns, EGLE
William Burbidge, GLWA
Pam Barnett, RACER
Brendan Mullen, RACER
Nick Martin, Hamp, Mathews & Associates

Attachment

Attachment A

2nd Semi-Annual 2025 Progress Report

Attachment A

2nd 2025 Semi-Annual Progress Report Performance-Based Administrative Order on Consent Eckles Road Site, Livonia, Michigan July 1, 2025 to December 31, 2025

1. Description of Work Completed

- Continued Pilot Shutdown of the Area 1 southern French Drain Collection Trench and Groundwater Treatment system (GWTP). Great Lakes Water Authority (GLWA) has been updated on operations. During the second half of 2025 the system collected and discharged 0 gallons of groundwater following commencement of the GWTP shutdown pilot test the end of March 2024. Monthly discharge totals are presented in Table 1. Sump elevation control points for pump operation were adjusted at the end of March 2024 to begin the activities proposed in the Area 1 Groundwater Treatment Plant Pilot Shutdown Work Plan (GHD, March 19, 2024). On March 30, 2024, the sump elevation control points were adjusted from between 693.3 feet above mean sea level (ft. amsl) and 695.3 ft amsl to between 697.0 ft amsl and 698.0 ft amsl. The groundwater elevation within the sump has equalized to approximately 696 ft amsl through December 2025. Groundwater elevation measurements were collected periodically from the French drain sump located within Area 1 and select monitoring wells as described in the Area 1 Groundwater Treatment Plant Pilot Shutdown Work Plan, as well as periodic downloads of transducer groundwater elevation data from monitoring wells inside and outside the Area 1 Barrier Wall. Monitoring locations are provided on Figure 1.
- Provided routine summaries/updates to USEPA and EGLE and participated in regular virtual meetings with USEPA and EGLE to discuss the AOI 31 off-site vapor intrusion Pathway investigation and conduit vapor intrusion evaluation updates.
- Submitted a *Proposed Sanitary Sewer Lateral Vapor Sampling Work Plan* dated July 3, 2025 to USEPA. USEPA provided comments via email on July 8, 2025, and July 9, 2025, a revised work plan was submitted on July 15, 2025. Approval of the work plan was issued by USEPA in a letter dated July 22, 2025.
- Submitted a sewer video inspection summary on July 11, 2025 to USEPA.
- Submitted draft resident information letters, fact sheets and access agreements to USEPA for review on July 14, 2025. Documents were revised collaboratively between RACER and USEPA.
- Submitted the 1st 2025 Semi-Annual Progress Report dated July 15, 2025, to USEPA. Based on comments received from USEPA, a revised 1st 2025 Semi-Annual Progress Report was submitted to USEPA on September 23, 2025.
- Submitted a *March 2025 Winter Seasonal Groundwater and Soil Vapor Sample Results* for AOI 31 Tech Memo dated July 23, 2025 to USEPA. Comments were received from USEPA on December 2, 2025 via email.
- Submitted a *June 2025 Sanitary Sewer Water Sampling Results* Tech Memo dated July 29, 2025 to USEPA.
- Submitted numerous data packages with laboratory analytical data for sewer lateral vapor samples and indoor air sample results as they were received from the laboratory for discussion purposes with USEPA.
- Submitted a *Proposed In-Home Response Activity Work Plan* dated September 12, 2025 to USEPA. Based on USEPA comments and discussions, a Revised *Proposed In-Home Response Activity Work Plan*

dated September 16, 2025 was submitted to USEPA. USEPA approval of the work plan was issued September 18, 2025 with conditions.

- Submitted a *Summary of Area 1 Performance Monitoring Activities* technical memorandum dated September 30, 2025.
- Submitted a *Proposed Interim Sewer Rehabilitation Work Plan* dated October 8, 2025 to USEPA. Based on USEPA comments and discussions, a Revised *Proposed Interim Sewer Rehabilitation Work Plan* was submitted to USEPA on October 10, 2025. USEPA approval of the work plan was issued October 15, 2025 with conditions.
- Submitted a semi-annual report to GLWA dated September 12, 2025, for the March 2025 through August 2025 reporting period.
- Implemented sanitary sewer lateral rehabilitation activities on November 11, 2025. Submitted a summary of the sewer rehabilitation activities via email on November 12, 2025 to USEPA.
- Completed Post-Construction and Interim Measure Performance Area 1 Groundwater Monitoring sampling activities September/October 2025. Area 1 performance monitoring well locations are presented on Figure 1.
- Implemented the AOI 31 Interim Measures for the Vapor Intrusion to Indoor Air Pathway as described in the Revised Work Plan. AOI 31 IM Performance Monitoring wells were sampled July 2025 and October 2025. AOI 31 IM Performance Monitoring soil gas probes were sampled August 2025 and November 2025.
- Conducted an inspection and performance evaluation of the Home 7 and Home 8 vapor mitigation systems October 27, 2025.
- Collected sanitary sewer water samples according to the *Proposed Interim Sewer Rehabilitation Work Plan* on November 17, 2025.
- Collected passive, 14-day sanitary sewer vapor samples (plus quality assurance sample) from four manhole locations on Grantland Street and three manhole locations on Newburgh Road between December 2, 2025 and December 16, 2025, according to the *Proposed Interim Sewer Rehabilitation Work Plan*.
- Submitted interim sample results packages and proposed sampling plans to USEPA for discussion during virtual meetings.
- Renewed GLWA Special Discharge Permit SD6-94508, now effective through December 2027.
- Participated in meetings with City of Livonia staff, and off-site residents, as necessary, regarding proposed leading edge assessment and remedial activities and conduit vapor intrusion evaluation and remediation activities.

2. Data Collected

- A Summary of Monthly Groundwater Treatment Plant Discharge Volumes is provided in Table 1.
- A summary of off-site groundwater, soil gas, and sanitary sewer vapor sample results from the Winter 2025 seasonal sampling event was provided under separate cover.
- A summary of groundwater elevations and sample results associated with the Area 1 Construction/Performance Monitoring activities through June 2025 was provided under separate cover.
- Draft AOI 31 Vapor Intrusion water, indoor air, and soil gas results data packages were provided to USEPA for discussion purposes and development of subsequent scopes of work related to the sanitary sewer gas evaluation activities.

3. Problems Encountered

- None.

4. Task Status and Information Summary for Selected Activities

- O&M of the Groundwater Pump & Treat System (GWTP, Barrier Wall, Cover) – In Progress
Continued operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system on an as-needed basis. Chromium VI and nickel treatment is no longer required to discharge to the sanitary sewer under GLWA special discharge permit. GAC installed to treat PFOS. Submitted appropriate discharge reports as per the Special Discharge Permit. Also see below item - PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring.
- Long-Term Groundwater Monitoring On-going – In Progress
Long-Term Groundwater Monitoring Plan proposed 5 years of monitoring to verify continued stability/reduction in off-Site/boundary concentrations (anticipated completion 2006 through 2010). Sampling activities are currently planned to continue pending USEPA approval to cease monitoring. Also see below item - PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring.
- Maintenance of the AOI 39 Dust Control Plan - Complete
- Restrictive Covenants - Complete
- Vapor Intrusion Investigation – Complete
(Task 1 VIAP activities are complete – See also AOI 31 Long-Term VI Pathway Monitoring and Groundwater TCE Remediation below)
- Installation of Vapor Mitigation System – Complete (Two homes)
O&M and Performance Monitoring of Vapor Mitigation System On-going System performance monitoring is being implemented annually. Latest system performance monitoring completed October 2025 at two homes.
- Area 1 Pilot Tests - Alternative Chemicals & Target In-Situ Treatment Injection - Complete
- Groundwater Treatment System Decommissioning & Removal for Area 1 - Complete
- Completion Report & Well Abandonment – Not started
Anticipated to be completed in 2037 per May 2010 RCES but this is likely to change given the interim measure being implemented for Area 1.
- AOI 31 Long-Term VI Pathway Monitoring and Groundwater TCE Remediation – In Progress
A Phase 2 VI Work Plan was submitted in 2023 and revised based on USEPA comments. Additional Geoprobe groundwater grab sample borings were installed to delineate the side-gradient edges of the plume, along with delineating the leading edge extents of the plume. Additional Phase 3 investigation activities were conducted in June 2024 to delineate the leading edge of the plume. Seasonal groundwater and soil vapor sampling activities continued through 2024 in general accordance with the Phase 2 and Phase 3 Work Plans. An interim measure to install a permeable reactive barrier at the leading edge was implemented April 2025 through June 2025. Four quarters of performance monitoring were initiated in July 2025. A review of mid-plume remedial alternatives was initiated in 2025 to evaluate potential actions

to reduce the concentrations of TCE in groundwater in the center of the plume and reduce long-term loading at the leading edge PRB installed in 2025.

A sanitary sewer VIAP evaluation was initiated in 2024 to evaluate the presence of TCE in sanitary sewer gas and evaluate the potential pathway to indoor air. Sanitary sewer gas samples were collected in 2024 and 2025. The sanitary sewer line was televised in 2025 to evaluate potential infiltration of impacted groundwater. Sewer lateral rehabilitation activities were completed in November 2025. Sanitary sewer conduit pathway evaluations will continue in 2026.

- Area 1 Remedial Implementation – Metals - Complete
- Area 1 PFAS and Metals Characterization - Complete
- PFAS Remedy/Interim Measure Evaluation - Complete
- PFAS Treatability Pilot Tests - Complete
- PFAS Remedy/Interim Measure Design - Complete
- PFAS Remedy/Interim Measure Implementation - Complete
- PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring - In Progress

The previous groundwater treatment plant (GWTP) was supplemented with granular activated carbon in April 2020 to remove PFAS from collected groundwater. Groundwater was collected and treated by the GWTP on an as-necessary basis (responding to precipitation events and generally maintaining the groundwater within the Area 1 Barrier Wall at depths greater than 3 feet bgs) from December 2018 through January 2021 to manage groundwater elevations within the Area 1 Barrier Wall. From February 2021 to March 2024 groundwater was collected and treated on an on-going basis. Certain groundwater treatment components were removed from the former GWTP building and relocated into a Conex box. New pump and control components were installed as part of the Interim Measure implementation activities in 2021. Construction monitoring and interim measure performance monitoring groundwater samples were collected from on-site monitoring wells in 2021, 2022, 2023, 2024, and 2025. O&M tasks are anticipated to change based on implementation and evaluation of the interim measure. A GWTP Pilot Shutdown Work Plan was submitted to USEPA in March 2024 and the GWTP was shutdown down on March 30, 2024 to evaluate the long term recovery of groundwater elevations and potential migration of impacted groundwater from Area 1. Groundwater elevations within the contained Area remain stable and the shutdown of the GWTP and groundwater monitoring activities continued through December 2025. A plan for ongoing O&M will be developed in 2026 including an evaluation of the GWTP pilot shutdown and long-term Interim Measure performance monitoring and groundwater elevation monitoring recommendations.

5. Summary of Contacts with Interested Parties

- Correspondence with GLWA regarding Special Discharge Permit activities and required reporting.
- Residents are updated on a one-on-one basis to maintain privacy of VI pathway risk evaluations at their homes.
- Participated in community update meetings with the City of Livonia and residents regarding the AOI 31 vapor intrusion pathway investigation and evaluation activities.
- Property owners south of Area 1 are updated on a one-on-one basis for access to sample monitoring wells as necessary.

6. Changes in Personnel

- None.

7. Projected Work for Next Reporting Period (January 2026 through June 2026)

- Prepare this 2nd 2025 Semi-Annual Progress Report
- Continue to work with USEPA and EGLE to address Area 1 impacts and with GLWA to address any discharge issues if the GWTP is restarted.
- Continue monitoring groundwater elevations and operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system in accordance with the approved Construction Groundwater Monitoring Plan and Revised Interim Measures Work Plan – Area 1 and GWTP Pilot Shutdown Work Plan.
- Evaluate potential AOI 31 mid-plume remedial alternatives.
- Prepare a work plan for the AOI 31 North Plume Delineation activities.
- Prepare an updated QAPP.
- Revise the summary of the winter 2025 AOI 31 seasonal groundwater and soil gas sampling activities based on USEPA comments and prepare a long-term monitoring scope.
- Provide a summary of Area 1 groundwater sampling results and elevation monitoring activities through December 2025 and long-term monitoring recommendations.
- Continue AOI 31 VIAP Interim Measure performance monitoring for the leading edge.
- Continue to conduct sanitary sewer VIAP evaluation activities.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.

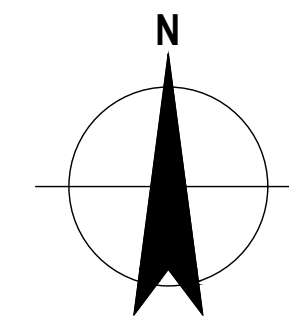
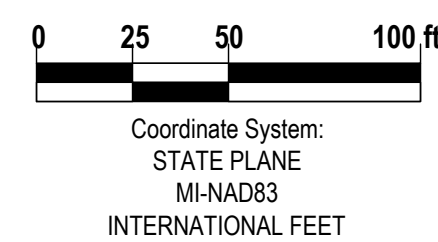
Attachments: Table 1 – Summary of Monthly Groundwater Treatment Plant Discharge Volume
Figure 1 – Construction and Performance Monitoring Locations

Figure



- LEGEND
- AREA BARRIER WALL
 - FRENCH DRAIN
 - GWTP DISCHARGE LINE
 - STORMWATER SEWER LINE
 - SITE BOUNDARY
 - SANITARY LINE
 - MW-A2-2S EXISTING MONITORING WELL/ PERFORMANCE MONITORING LOCATION
 - MW-A2-2S EXISTING MONITORING WELL/ CONSTRUCTION MONITORING LOCATION
 - MW-A2-2S EXISTING MONITORING WELL/ CONSTRUCTION AND PERFORMANCE MONITORING LOCATION
 - STW-001 STORM SEWER LOCATION
 - JET-GROUTED BARRIER WALL

Image Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Accessed: 2023



RACER TRUST
ECKLES ROAD SITE
LIVONIA, MICHIGAN

CONSTRUCTION MONITORING LOCATIONS
PERFORMANCE MONITORING LOCATIONS
AREA 1 INTERM MEASURE COMPONENTS

Project No. 12573440
Date September 2023

FIGURE 1

Table

Summary of Monthly Groundwater Treatment Plant Discharge
Area 1 - Former Plating Area
Eckles Road Site
Livonia, Michigan

	Monthly GWTP Discharge Volume (Gallons)
Month	
July 2025	0
August 2025	0
September 2025	0
October 2025	0
November 2025	0
December 2025	0
Total July 2025 to December 2025 Discharge	0

Notes:

GWTP Pilot Shutdown initiated March 30, 2024