

Mr. Joe Rogers
Michigan Department of Environment, Great Lakes, and Energy
525 West Allegan Street
Constitution Hall, Atrium North
Lansing, MI 48909

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Date: June 16, 2026

Our Ref: 30321421

Subject: 2025 Exposure Barrier Inspection Report for Plant 2, Areas 2, 5-2, 5-3; Plant 3, Areas 14, 18, and 19; and Plant 6, Area 5-6
RACER Lansing Plants, Lansing, Michigan

Dear Mr. Rogers,

Arcadis of Michigan, LLC, on behalf of RACER Trust, completed visual inspections of exposure barriers at Areas 2, 5-2, 5-3; Areas 14, 18, and 19, at Lansing Plant 3; and exposure barrier Area 5-6, at Lansing Plant 6 in Lansing Township and Lansing, Michigan. In accordance with the Plants 2 and 3 Soil Corrective Measures Summary, dated May 3, 2023, the exposure barrier at the Former Tank 225 Area is no longer necessary and therefore was not inspected in 2025. **Figure 1** shows the approximate locations of the exposure barriers at Plants 2, 3, and 6 that were inspected. The inspections were completed and this report was prepared per the recommendation in the *Plants 2 and 3 Soil Corrective Measures Summary*, dated May 3, 2023 and the *Plant 2 Area 2 Excavation and Plants 2 and 3 Exposure Barrier Placement Completion Report*, dated August 1, 2024, that the exposure barrier areas be visually inspected and conditions of these areas documented in an Inspection Report for submittal to EGLE. The inspections at each of these areas were completed on July 9, 2025. Arcadis staff documented the visual inspection by completing the inspection form for each area and by taking photographs of each area. See **Attachment 1** for the completed inspection forms and photograph logs.

Based on the visual inspections completed at each exposure barrier area the following was observed:

- Plant 2 Area 2 Exposure Barrier – condition was noted as satisfactory and in good condition. The exposure barrier area consists of existing concrete pavement. The concrete shows some signs of weathering and cracking, with some areas also containing short grass growth. At the time of the inspection the exposure barrier appears to be functioning adequately to prevent exposure to the underlying soil containing concentrations of arsenic that exceed Michigan Environment, Great Lakes, and Energy (EGLE) Part 201 generic Nonresidential Direct Contact Criteria (December 30, 2013). Accordingly, no corrective actions are recommended. The soils above Direct Contact Criteria for arsenic were located between existing concrete and a grassy area onsite. Therefore, in December 2023, an excavation was completed to remove impacted soils in the grassy area onsite. The existing concrete remains over the soils that were not removed during excavation and constitutes the exposure barrier area that will be visually inspected on an annual basis. The

excavation activities are summarized in the *Plant 2 Area 2 Excavation and Plants 2 and 3 Exposure Barrier Placement Completion Report*, dated August 1, 2024.

- Plant 2 Area 5-2 and Area 5-3 Exposure Barriers – condition was noted as satisfactory and in good condition. The exposure barriers in these areas were placed in December 2023 and consist of demarcation fabric underlying an approximate 6-inch to 1-foot layer of 22A road gravel. During inspection low lying grasses and other vegetation were observed to be growing on the majority of the exposure barrier areas. At the time of the inspection the exposure barriers appeared to be functioning adequately to prevent exposure to the underlying soil containing concentrations of benzo(a)pyrene that exceed EGLE Part 201 generic Nonresidential Direct Contact Criteria (December 30, 2013). Accordingly, no corrective actions are recommended. The exposure barrier placement activities are summarized in the *Plant 2 Area 2 Excavation and Plants 2 and 3 Exposure Barrier Placement Completion Report*, dated August 1, 2024. Due to the exposure barrier placement at Areas 5-2 and 5-3, and vehicle parking activity occurring at the Site, it was suggested that traffic barrels with yellow plastic chain link be placed around the exposure barrier areas to identify these areas and prevent vehicles from driving over the barriers. This was completed in July 2024 and was still in place during 2025 inspections.
- Plant 3 Area 14 Exposure Barrier – condition was noted as satisfactory and in fair condition. The exposure barrier in this area consists of existing concrete pavement. The concrete shows some signs of weathering and cracking, with some areas also containing vegetation growth. At the time of the inspection the exposure barrier appears to be functioning adequately to prevent exposure to the underlying soil containing concentrations of cyanide that exceed EGLE Part 201 generic Nonresidential Direct Contact Criteria (December 30, 2013). Accordingly, no corrective actions are recommended.
- Plant 3 Area 18 Exposure Barrier – condition was noted as satisfactory and in good condition. The exposure barrier in this area was placed in December 2023 and consists of demarcation fabric underlying a layer of 22A road gravel. During inspection no vegetation was observed to be growing in the exposure barrier areas. A few small shrubs were observed to be growing near the perimeter of the barrier. At the time of the inspection the exposure barrier appeared to be functioning adequately to prevent exposure to the underlying soil containing concentrations of benzo(a)pyrene that exceed EGLE Part 201 generic Nonresidential Direct Contact Criteria (December 30, 2013). Accordingly, no corrective actions are recommended. The exposure barrier placement activities are summarized in the *Plant 2 Area 2 Excavation and Plants 2 and 3 Exposure Barrier Placement Completion Report*, dated August 1, 2024.
- Plant 3 Area 19 Exposure Barrier – condition was noted as satisfactory and fair condition. The exposure barrier area consists of existing concrete pavement. The concrete shows some signs of weathering and cracking. At the time of the inspection the exposure barrier appeared to be functioning adequately to prevent exposure to the underlying soil containing concentrations of arsenic that exceed EGLE Part 201 generic Nonresidential Direct Contact Criteria (December 30, 2013). Accordingly, no corrective actions are recommended.

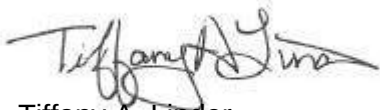
Mr. Joe Rogers
Michigan Department of Environment, Great Lakes, and Energy
June 16, 2026

- Plant 6 Area 5-6 Exposure Barrier – condition was noted as satisfactory and in fair condition. The exposure barrier area consists of portions of concrete pavement as well as some areas of crushed concrete. The concrete shows some signs of weathering and cracking, with some areas also containing vegetation growth and some standing water. At the time of the inspection the exposure barrier appeared to be functioning adequately to prevent exposure to the underlying soil containing concentrations of lead that exceed EGLE Part 201 generic Nonresidential Direct Contact Criteria (December 30, 2013). Accordingly, no corrective actions are recommended. The steel markers placed in September 2023 were still present, in good condition, with the stamping on the markers legible during the 2025 inspection.

The following exposure barriers will again be inspected in third quarter of 2026: Plant 2 Areas 2, 5-2, and 5-3; Plant 3 Areas 14, 18, and 19; and Plant 6 Area 5-6.

Please contact me at the information provided below with any questions or comments you may have.

Sincerely,
Arcadis of Michigan, LLC



Tiffany A. Linder
Certified Project Manager

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

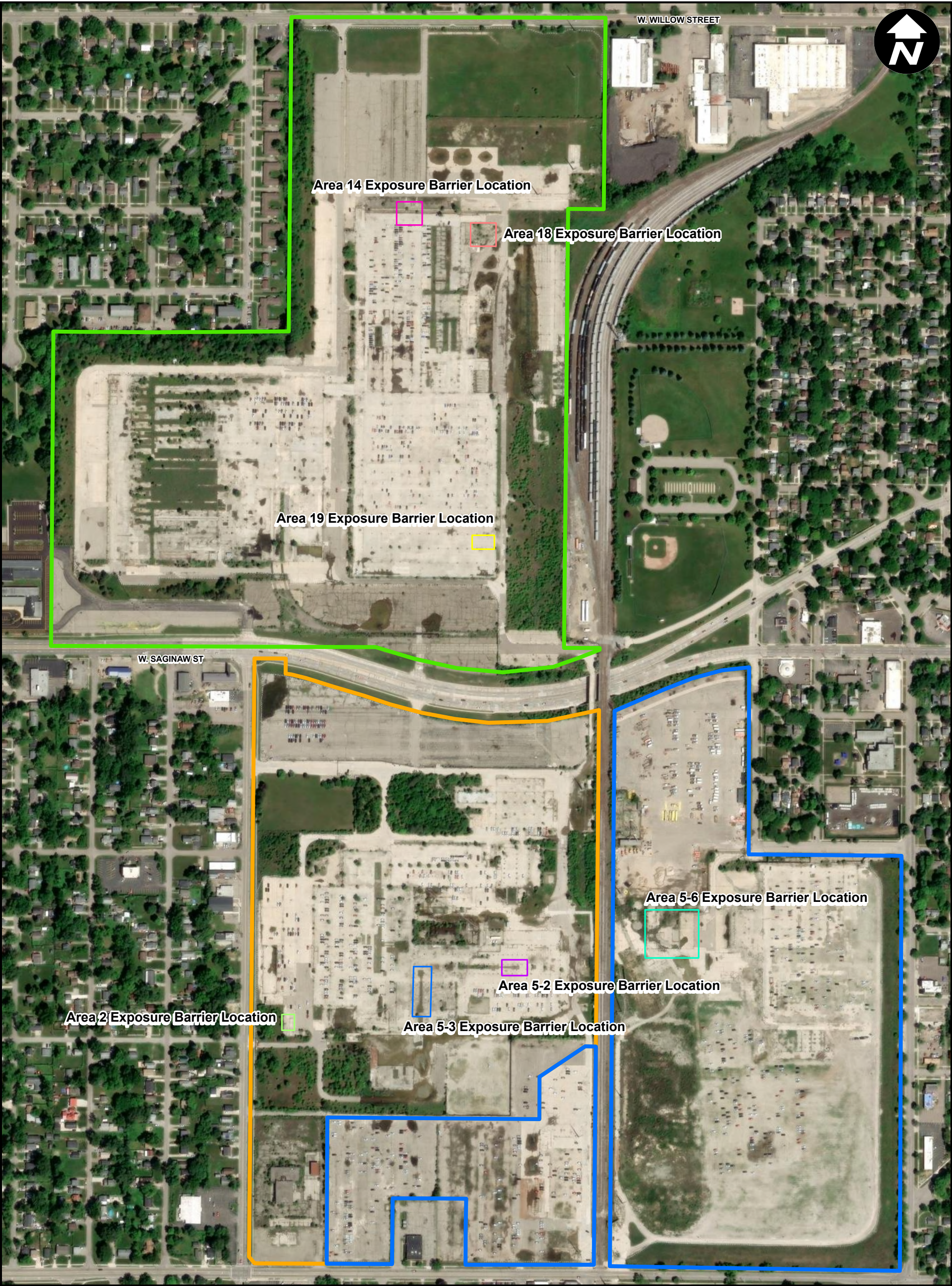
C: Brendan Mullen, RACER Trust
Dave Favero, RACER Trust

Figures:
Figure 1 – Exposure Barrier Locations

Attachments:
1 - 2025 Exposure Barrier Inspection Forms and Photograph Logs for Each Area

FIGURES

CITY: Novi DIV: ENV PIC: J. BARRETT PM: T. LINDER TR: A. LORENZ PROJECT NUMBER: 30112892 COORDINATE SYSTEM: NAD 1983 StatePlane Michigan South FIPS 2113 Feet Intl
T:_ENV\RACER\Lansing_BuffaloData\MXDs\2023 Excavation and Cover Summary.aprx PLOTTED: 10/3/2024 6:09 AM BY: KGPeters



PLANT BOUNDARIES

- PLANT 2
- PLANT 3
- PLANT 6

EXPOSURE BARRIER LOCATIONS

- AREA 2 EXPOSURE BARRIER LOCATION
- AREA 14 EXPOSURE BARRIER LOCATION
- AREA 18 EXPOSURE BARRIER LOCATION
- AREA 19 EXPOSURE BARRIER LOCATION
- AREA 5-2 EXPOSURE BARRIER LOCATION
- AREA 5-3 EXPOSURE BARRIER LOCATION
- AREA 5-6 EXPOSURE BARRIER LOCATION



RACER TRUST
PLANTS 2, 3 & 6
LANSING, MICHIGAN

EXPOSURE BARRIER LOCATIONS



ATTACHMENT 1

2025 Exposure Barrier Inspection Forms and Photograph Logs for
Each Area

**MAINTENANCE OF EXPOSURE BARRIERS
INSPECTION LOG SHEET
RACER Trust Plants 2 and 3 – Lansing, Michigan**

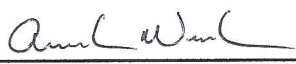
DATE: 7/9/25

TIME: 1210

Inspection		
Is the Surface Cover Consistent With Existing Conditions?		
Exposure Barrier	Condition Satisfactory (X)	Condition Unsatisfactory (X)
Plant 2 - Area 2	☒	☐
Plant 2 - Area 5-2	☒	☐
Plant 2 - Area 5-3	☒	☐
Plant 3 - Area 14	☒	☐
Plant 3 - Area 18	☒	☐
Plant 3 - Area 19	☒	☐

Comments*:

Print Name (Inspector): Austin Westhuis

Inspector's Signature: 

***Comments and photos attached**

**MAINTENANCE OF EXPOSURE BARRIERS
INSPECTION LOG SHEET**
RACER Trust Plants 2 and 3 – Lansing, Michigan

Exposure Barrier	Groundcover Condition (Describe weathering, erosion, settling, water ponding, vegetation growth, etc.)	Overall Condition (Good / Fair / Poor)	Photo Notes (Attach labelled photographs)
Plant 2 Area 2 Exposure Barrier	The Eastern half of the exposure barrier consists of a concrete cap. The concrete shows little cracking with short grassy growth in a few areas. The Western half of the exposure barrier consists of a gravel and dirt cap. No signs of settling, weathering, and erosion. No vegetation growing off Western half. Traffic barrels and yellow plastic chain now protect barrier and flares	Good	1. See attached photo log for pictures of the area. 2. 3. 4.
Plant 2 Area 5-2 Exposure Barrier	Most of the exposure barrier ground cover consists of a gravel and dirt cap. No signs of settling, weathering, and erosion. Low lying grasses and other vegetation now growing on majority of the cap. Traffic barrels and yellow plastic chain now protect the barrier.	Good	1. See attached photo log for pictures of the area. 2. 3. 4.
Plant 2 Area 5-3 Exposure Barrier	Most of the exposure barrier ground cover consists of a gravel and dirt cap. No signs of settling, weathering, and erosion. Low lying grasses and other vegetation now growing on majority of the cap. Traffic barrels and yellow plastic chain now protect barrier.	Good	1. See attached photo log for pictures of the area. 2. 3. 4.

**MAINTENANCE OF EXPOSURE BARRIERS
INSPECTION LOG SHEET**
RACER Trust Plants 2 and 3 – Lansing, Michigan

Exposure Barrier	Groundcover Condition (Describe weathering, erosion, settling, water ponding, vegetation growth, etc.)	Overall Condition (Good / Fair / Poor)	Photo Notes (Attach labelled photographs)
Plant 3 Area 14 Exposure Barrier	Most of the exposure barrier ground cover consists of concrete pavement. The area shows some signs of weathering and cracking. There are a couple poplar trees and some weeds growing up through the cracks.	Fair	1. See attached photo log for 2. pictures of the area. 3. 4.
Plant 3 Area 18 Exposure Barrier	Most of the exposure barrier ground cover consists of a gravel and dirt cap. No signs of settling, weathering, and erosion. No vegetation growing in the gravel and dirt at this time. Few poplar shrubs growing near the perimeter.	Good	1. See attached photo log for 2. pictures of the area. 3. 4.
Plant 3 Area 19 Exposure Barrier	Most of the exposure barrier ground cover consists of concrete pavement. The area shows some signs of weathering and cracking.	Fair	1. See attached photo log for 2. pictures of the area. 3. 4.

Based on the above observations, are any corrective actions (i.e., repairs) required? _____

The overall condition of the ground cover is fair. There are no corrective actions necessary at this time.

Photograph Log



RACER Trust
Lansing Plant 2 Area 2
Project # 30267725



Photograph: 1

Description: Plant 2
Area 2 looking South

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 2

Description: Plant 2
Area 2 looking West

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 2 Area 2
Project # 30267725



Photograph: 3

Description: Plant 2
Area 2 looking North

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 4

Description: Plant 2
area 2 looking East

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 2 Area 5-2
Project # 30267725



Photograph: 1

Description: Plant 2
Area 5-2 looking South

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 2

Description: Plant 2
Area 5-2 looking East

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 2 Area 5-2
Project # 30267725



Photograph: 3

Description: Plant 2
Area 5-2 looking North

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 4

Description: Plant 2
Area 5-2 looking West

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 2 Area 5-2
Project # 30267725



Photograph: 5

Description: Plant 2
Area 5-2 close up of
exposure barrier

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 2 Area 5-3
Project # 30267725



Photograph: 1

Description: Plant 2
Area 5-3 looking South

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 2

Description: Plant 2
Area 5-3 looking East

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 2 Area 5-3
Project # 30267725



Photograph: 3

Description: Plant 2
Area 5-3 looking North

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 4

Description: Plant 2
Area 5-3 looking West

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 2 Area 5-3
Project # 30267725



Photograph: 5

Description: Plant 2
Area 5-3 cover close up
of exposure barrier

Location: Plant 2

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 3 Area 14
Project # 30267725



Photograph: 1

Description: East end of Area 14 looking West

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 2

Description: North end of Area 14 looking South

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 3 Area 14
Project # 30267725



Photograph: 3

Description: South end of Area 14 looking North

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 4

Description: West end of Area 14 looking East

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 3 Area 18
Project # 30267725



Photograph: 1

Description: Plant 3
Area 18 looking East

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 2

Description: Plant 3
Area 18 looking North

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 3 Area 18
Project # 30267725



Photograph: 3

Description: Plant 3
Area 18 looking South

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 4

Description: Plant 3
Area 18 looking West

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 3 Area 19
Project # 30267725



Photograph: 1

Description: East end of Area 19 looking West

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 2

Description: North end of area 19 looking South

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 3 Area 19
Project # 30267725



Photograph: 3

Description: South end of area 19 looking North

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 4

Description: West end of Area 19 looking East

Location: Plant 3

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

**MAINTENANCE OF EXPOSURE BARRIERS
INSPECTION LOG SHEET
RACER Trust Plant 6 – Lansing, Michigan**

DATE: 7/9/25

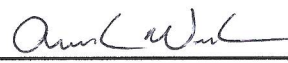
TIME: 1300

Inspection		
Is the Surface Cover Consistent With Existing Conditions?		
Exposure Barrier	Condition Satisfactory (X)	Condition Unsatisfactory (X)
Area 5-6 Exposure Barrier	☒	☐

Comments*:

Area 5-6 Exposure Barrier corner markers are in good condition and the
stamping is legible

Print Name (Inspector): Austin Westhuis

Inspector's Signature: 

***Comments and photos attached**

MAINTENANCE OF EXPOSURE BARRIERS INSPECTION LOG SHEET RACER Trust Plant 6 – Lansing, Michigan

Exposure Barrier	Groundcover Condition (Describe weathering, erosion, settling, water ponding, vegetation growth, etc.)	Overall Condition (Good / Fair / Poor)	Photo Notes (Attach labelled photographs)
Area 5-6 Exposure Barrier	Most of the exposure barrier ground cover consists of concrete pavement with some sections containing crushed concrete. The concrete shows some signs of weathering and cracking, with some areas containing poplar tree and phragmite growth. A few areas have ponding water.	Fair.	1. See attached photos of the area 2. 3. 4.

Based on the above observations, are any corrective actions (i.e., repairs) required? The overall condition of the ground cover is fair. Brush clearing and/or mowing is recommended.

Photograph Log

RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 1

Description: Plant 6
Area 5-6 looking East

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 2

Description: Plant 6
Area 5-6 looking
Northwest

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 3

Description: Plant 6
Area 5-6 looking South

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025



Photograph: 4

Description: Plant 6
Area 5-6 looking West

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 5

Description: Plant 6
Area 5-6 NE Corner
Marker (1 of 4 Markers)

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 6

Description: Plant 6
Area 5-6 NW Corner
Marker (2 of 4 Markers)

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 7

Description: Plant 6
Area 5-6 NW Corner
Marker Location

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 8

Description: Plant 6
Area 5-6 SE Corner
Marker (3 of 4 Markers)

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 9

Description: Plant 6
Area 5-6 SE Corner
Marker Location

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log

RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 10

Description: Plant 6
Area 5-6 SW Corner
Marker (4 of 4 Markers)

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025

Photograph Log



RACER Trust
Lansing Plant 6 Area 5-6
Project # 30267725



Photograph: 11

Description: Plant 6
Area 5-6 SW Corner
Marker Location

Location: Plant 6

Photograph taken by:
Austin Westhuis

Date: 7/9/2025