



**Applied EcoSystems, Inc.**  
Environmental Management, Consulting & Field Services

Transmitted via E-mail

July 15, 2026

Æ Project No. 11-4317-102

Mr. Tyler Jacobs (Jacobs.Tyler@epa.gov)  
Physical Scientist, Corrective Action Section 1  
Land, Chemicals and Redevelopment Division, Region 5, U.S. EPA  
77 West Jackson Blvd. (LR-16J)  
Chicago, IL 60604

RE: First Half 2026 Progress Report  
Performance-Based Administrative Order on Consent  
RCRA Corrective Action  
Flint West Facility #12990  
Flint, Michigan  
USEPA ID No. MIK204011722<sup>A</sup>

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Dear Mr. Jacobs:

In accordance with paragraph 24.b. of the Performance-Based Administrative Order on Consent, Docket No. 05-2011-0021 (AOC), between the U.S. Environmental Protection Agency Region 5 (USEPA) and the Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the first half of 2026 (January 1, 2026 through June 30, 2026) for the RACER Trust Flint West Facility, located west of Stevens Street and north of Glenwood Avenue in Flint, Genesee County, Michigan.

Please contact me if you would like to discuss this matter further. Thank you.

Sincerely,

Rodney Abke, CPG, LPG  
Senior Geologist

A – Note that this facility is identified as USEPA ID No. MID005356654 in the Administrative Order on Consent for this facility. However, the correct USEPA ID No. is MIK204011722.

Attachment A – First Half 2026 Progress Report

Cc: Shaun Shields, EGLE RRD  
Brendan Mullen, RACER  
David Favero, RACER  
Mike Smith, Applied Ecosystems

ATTACHMENT A  
FIRST HALF 2026 PROGRESS REPORT  
PERFORMANCE-BASED ADMINISTRATIVE ORDER ON CONSENT  
FLINT WEST FACILITY - #12990, FLINT, MICHIGAN  
January 1, 2026 to June 30, 2026

WORK PERFORMED THIS PERIOD

- Prepared the Second Half 2025 Progress Report and submitted it to USEPA on January 12, 2026.
- Conducted the first every other year groundwater monitoring event that in addition to the five routine wells sampled semi-annually includes five up- and side-gradient wells on March 17 and 18, 2026, including gauging monitoring wells for depth to water on March 17, 2026.
- Prepared a Data Report summarizing the March 2026 sampling, which was submitted to USEPA on June 24, 2026.
- Received comments from USEPA on the November 5, 2026 Revised Draft Evaluation and Response to USEPA Comments on June 30, 2026.

DATA COLLECTED THIS PERIOD

Groundwater Monitoring

- Analyzed the groundwater samples collected from monitoring wells MW-100S\*, MW-103S, MW-104S\*, MW-106SR\*, MW-107S\*, MW-108S, MW-110S, MW-112S, MW-114S, and MW-117S\* [\*-per USEPA's August 13, 2024, email approval, this monitoring event was the first every-other-year event to include five up- and side-gradient wells (MW-100S, MW-104S, MW-106SR, MW-107S, and MW-117S)] for analysis of Volatile Organic Compounds (VOCs), dissolved and total metals (arsenic, chromium [total], chromium VI, copper, lead, selenium, and zinc), and per- and polyfluoroalkyl substances (PFAS). Data was provided to USEPA in the June 24, 2026 Data Report.

PROBLEMS ENCOUNTERED AND THEIR RESOLUTIONS

No problems were encountered.

ESTIMATED PERCENT COMPLETE AND INFORMATION SUMMARY FOR SELECTED ACTIVITIES

- RFI Phase II Sampling Matrix Preparation and Fieldwork Implementation (Proposed 2012 activities) 100%

The 2012 portions of the proposed Phase II investigation included in the June 26, 2012, Phase I Data Report were completed and included the completion and sampling of 13 soil borings, eight of which were finished as monitoring wells. Soil and groundwater samples from the 8 new and 5 previously

installed monitoring wells were collected and were analyzed for ten MDEQ Metals including Chromium VI, VOCs (USEPA 8260), and PNAs (USEPA 8310).

- RFI Phase II Data Report Preparation 100%  
(Submitted February 12, 2013)
- Human Health EI (CA725) Report 100%  
(Submitted July 1, 2013)
- Data Report Preparation 100%  
(Additional investigations and groundwater monitoring)  
(Submitted July 9, 2013)
- Data Report Preparation 100%  
(Additional well installation and groundwater monitoring)  
(Submitted October 12, 2013)
- Groundwater Migration under Control EI (CA750) 100%  
(Submitted March 1, 2014)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted March 18, 2014)
- Data Report Preparation 100%  
(April 2014 additional investigations and groundwater monitoring)  
(Submitted June 23, 2014)
- Data Report Preparation 100%  
(June 2014 groundwater monitoring and July 2014 additional soil investigations)  
(Submitted October 3, 2014)
- Draft Corrective Measures Proposal 100%  
(Submitted November 1, 2014)
- Data Report Preparation 100%  
(December 2014 additional soil investigation and groundwater monitoring)  
(Submitted February 13, 2015)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted August 12, 2015)
- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted February 23, 2016)

- Data Report Preparation 100%  
(Groundwater monitoring)  
(Submitted August 3, 2016)
- Draft Work Plan for Hydrogen Release Compound (HRC) 100%  
Pilot Test Preparation  
(Submitted October 7, 2016, addendum submitted to USEPA  
and MDEQ July 12, 2017)
- Data Report Preparation 100%  
(Groundwater monitoring - October and November 2016)  
(Submitted February 21, 2017)
- Data Report Preparation 100%  
(Groundwater monitoring – June 2017)  
(Submitted August 11, 2017)
- Data Report Preparation 100%  
(Groundwater monitoring – January 2018)  
(Submitted April 11, 2018)
- Data Report Preparation 100%  
(Groundwater monitoring. HRC Pilot Study – May through July 2018)  
(Submitted July 27, 2018)
- Data Report Preparation 100%  
(Groundwater Sampling for HRC Pilot Study and routine groundwater  
monitoring – August to September 2018)  
(Submitted October 16, 2018)
- Data Report Preparation 100%  
(October 16/17, 2018 post-HRC injection groundwater sampling)  
(Submitted December 12, 2018)
- Data Report Preparation 100%  
(January and February sampling)  
(Submitted April 9, 2019)
- Data Report Preparation 100%  
(July sampling)  
(Submitted September 4, 2019)
- Work Plan for Hydrogen Release Compound (HRC) 100%  
Injection Preparation  
(Submitted October 10, 2019)  
(Comments received from USEPA November 4, 2019)
- Preliminary Draft Response to

|                                                                                                                      |      |
|----------------------------------------------------------------------------------------------------------------------|------|
| USEPA November 4, 2019 comment letter<br>(Submitted it to USEPA on January 18, 2020)                                 | 100% |
| • Data Report Preparation<br>(February sampling)<br>(Submitted April 10, 2020)                                       | 100% |
| • Data Report Preparation<br>(August sampling)<br>(Submitted September 29, 2020)                                     | 100% |
| • Per- and Polyfluoroalkyl Substances Subsurface Investigation Work Plan<br>(Submitted to USEPA on October 28, 2020) | 100% |
| • Quality Assurance Project Plan Update<br>(Submitted to USEPA on April 1, 2021)                                     | 100% |
| • Data Report Preparation<br>(March sampling)<br>(Submitted April 23, 2021)                                          | 100% |
| • PFAS Subsurface Investigation Report Preparation<br>(April Investigation)<br>(Submitted September 22, 2021)        | 100% |
| • Data Report Preparation<br>(September sampling)<br>(Submitted November 22, 2021)                                   | 100% |
| • PFAS Subsurface Investigation Report Preparation<br>(November 2021 Investigation)<br>(Submitted January 27, 2022)  | 100% |
| • Data Report Preparation<br>(March 2022 sampling)<br>(Submitted May 13, 2022)                                       | 100% |
| • Data Report Preparation<br>(September 2022 sampling)<br>(Submitted December 13, 2022)                              | 100% |
| • Data Report Preparation<br>(March 2023 sampling)<br>(Submitted June 29, 2023)                                      | 100% |
| • Data Report Preparation<br>(September 2023 sampling)<br>(Submitted February 7, 2024)                               | 100% |

- Draft Corrective Measures Study 100%  
(Submitted February 27, 2024)
- Data Report Preparation 100%  
(March 2024 sampling)  
(Submitted May 9, 2024)
- Data Report Preparation 100%  
(September 2024 sampling)  
(Submitted December 18, 2024)
- Data Report Preparation 100%  
(March 2025 sampling)  
(Submitted May 18, 2025)
- Exposure Pathway Evaluation 100%  
(Revised Draft Evaluation and Response to USEPA Comments Submitted November 4, 2025, Comments received from USEPA on June 30, 2026)
- Data Report Preparation 100%  
(September 2025 sampling)  
(Submitted December 29, 2025)
- Data Report Preparation 100%  
(March 2026 sampling)  
(Submitted June 24, 2026)

SCHEDULE AND PROJECTED WORK FOR NEXT REPORTING PERIOD

- Address USEPA comments on the revised Exposure Pathway Evaluation.
- Meet with USEPA to discuss project status and path forward.
- Complete groundwater monitoring (routine monitoring event) in September or October 2026.
- Prepare a Data Report summarizing the results of the Fall 2026 groundwater sampling in November or December 2026.
- Review, discuss and respond to any USEPA or EGLE comments on Data Reports and other submittals.
- Provide support to USEPA for its Statement of Basis and Final Decision process.

- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.