

# Environmental Status Report

Updated Thru December 31, 2025

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## **Acronym Definitions**

### **A**

ACM: Asbestos Containing Materials  
ACO: Administrative Order of Consent  
AOC: Area of Contamination

### **B**

BMP: Best Management Program

### **C**

CA: Corrective Action  
CACC: Corrective Action Complete with Controls  
CACO: Corrective Action Consent Order  
CAF: Corrective Action Framework  
CAMP: Corrective Action Monitoring and Maintenance  
CAMU: Corrective Action Management Unit  
CAP: Corrective Action Plan  
CEA: Classification Exception Area  
CMI: Corrective Measures Implementation  
CMP: Corrective Measures Proposal  
CSC: Crotty Street Channel  
CSM: Conceptual Site Model  
cVOC: Chlorinated Volatile Organic Compound

### **D**

dCSM: digital Conceptual Site Model  
DGR: Dynamic Groundwater Recirculation  
DMR: Discharge Monitoring Report  
DRC: Declaration of Restrictive Covenant

### **E**

EAP: Emergency Action Plan  
EGLE: State of Michigan Department of Environment, Great Lakes, and Energy, formerly Department of Environmental Quality  
EI: Environmental Indicators  
ERA: Ecological Risk Assessment  
ERC: Environmental Restrictive Covenant  
ERD: Enhanced Reductive Dechlorination  
EUC: Environmental Use Control

### **F**

FDA: Former Disposal Area  
FFS: Focused Feasibility Study  
FPR: Free Product Recovery System  
FSP: Former Storm Water Pond

### **G**

GAC: Granular activated carbon  
GLWA: Great Lakes Water Authority  
GMP: Groundwater Monitoring Plan  
GSI: Groundwater/Surface Water Interface  
GSIPC: Groundwater Surface Water Interface Protection Criteria

### **H**

HRC: Hydrogen Release Compound

### **I**

IGMP: Interim GW Monitoring Plan  
ILF: Industrial Landfill  
IMWP: Interim Measures Work Plan  
IRZ: In-Situ Reactive Zones  
ISCO: In-situ Chemical Oxidation  
ISCR: In-Situ Chemical Reduction

### **L**

LDS: Leak Detection System  
LNAPL: Light Non-Aqueous Phase Liquids  
LTOMM: Long-Term Operation, Maintenance, and Monitoring  
LTS: Long-Term Stewardship

### **M**

MMD: Materials Management Division  
MMP: Materials Management Plan  
MNA: Monitored Natural Attenuation  
MSA: Materials Storage Area

### **N**

NAPL: Non-Aqueous Phase Liquid  
NFA: No Further Action  
NOI: Notice of Intent  
NPDES: National Pollutant Discharge Elimination System  
NSZD: Natural Source Zone Depletion

### **O**

OMM: Operation, Maintenance, and Monitoring  
OOC: Order of Conditions

### **P**

PCB: Polychlorinated biphenyls  
PDI: Pre-Design Investigation  
PCE: Tetrachloroethene  
PFAS: Per- and Poly-fluoroalkyl Substances  
PMP: Pollutant Minimization Plan  
PRB: Permeable Reactive Barrier

### **Q**

QAPP: Quality Assurance Project Plan

### **R**

RA: Remedial Alternatives  
RAP: Response Action (or Activity) Plan  
RAR: Remedial Action Report  
RAT: Remediation Advisory Team  
RFI: RCRA Facility Investigation

RIR: Remedial Investigation Report

ROW: Right of Way

**S**

SMA: Soil Management Area

SOW: Scope of Work

SPLP: Synthetic Precipitation Leaching Procedure

SSDS: Sub-Slab Depressurization System

STCM: Short-Term Construction Monitoring

SWPPP: Storm Water Pollution Prevention Plan

**I**

TAPS: EGLE Technical Assistance and Program Support

Teams

TCE: Trichloroethylene

TSCA: Toxic Substances Control Act

**V**

VI: Vapor Intrusion

VOC: Volatile Organic Compound

**DELAWARE**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Submitted Year Three Groundwater Monitoring Report to DNREC as required by the Long-Term Stewardship (LTS) Plan. Also submitted the revised LTS monitoring plan and the decommissioning plan for the soil vapor extraction (SVE) system. Received DNREC approval for the LTS Year Three Report, the LTS addendum, and SVE decommissioning plan. Continue to work with off-Site property owners to secure access to sample/abandon groundwater monitoring wells and soil gas vapor points.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Completed Long Term Operating Maintenance & Monitoring (LTOMM) activities outlined in the LTS Plan. These activities included groundwater monitoring and sampling at the Site and inspection of the OU-5 Cap. Obtained access to continue with downgradient monitoring activities associated with LTOMM activities. Abandoned off-Site monitoring wells and soil gas points that are not part of the LTS monitoring program. Abandoned on-Site monitoring well MW-36D that had collapsed and SVE wells that were part of the SVE system that was shut down in 2019.

**Status**

No change in status.

Updated through December 31, 2025

## ILLINOIS

**RACER has completed Environmental Action work at the following Site, and no further Environmental Action is planned or anticipated there. Therefore, this edition and future editions of the Environmental Action Status Reports does and will not include a separate section for this Site.**

IL – State – Site 12330 – Danville LF

**INDIANA**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

EPA transitioned a new project management team onto the project. EPA and RACER had a transition call to provide background on the project and parcels as well as a status update and next steps.

Parcel 2 – During the transition call, EPA agreed that after RACER recorded an Environmental Restrictive Covenant (ERC) Modification that identifies monitoring wells that have had historical detections of PCBs, EPA would issue a No Further Action (NFA) for Parcel 2. RACER prepared an ERC Modification for review by the property owner, EPA, IDEM, and General Motors LLC as signatories. The property owner has signed the ERC Modification.

Parcel 39 (Restoration) – RACER has continued communications with the property owners of four parcels subject to the Parcel 39 restoration. RACER has also communicated with IDEM the Trust's efforts to date to effectuate the signing of ERCs for the four parcels (two letters, numerous phone calls, and door knocking).

RACER worked on preparing the semi-annual progress report which detailed activities completed in the first half of 2025.

**Status**

RACER will record the ERC Modification for Parcel 2 when fully executed by all parties at which point actions related to Parcel 2 will be complete. RACER will continue to work with IDEM to evaluate the potential for closure of Parcel 39.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Parcel 2 – RACER prepared a draft ERC Modification for review by the owner, GM LLC, IDEM, and USEPA. The property owner agreed to the recording of an ERC on the property. USEPA and IDEM approved the language of the ERC and RACER included the approval letters as exhibits to the ERC. The final version of the ERC was sent to all parties to the ERC and will be recorded upon receiving the signature pages.

Parcel 39 (Restoration) – RACER continued discussions with IDEM and USEPA related to ERC communications with the property owners.

USEPA is evaluating the next steps for monitoring wells located on RACER-owned parcels that are not required in RACER's future obligations.

RACER worked on preparing the EPA semi-annual progress report which detailed activities completed in the second half of 2025.

**Status**

RACER will record the ERC Modification for Parcel 2 when fully executed by all parties at which point actions related to Parcel 2 will be complete. RACER will continue to work with USEPA and IDEM to evaluate the potential for closure of Parcel 39. RACER will continue to work with USEPA regarding the potential abandonment of unneeded monitoring wells.

**JANUARY 1, 2025 through JUNE 30, 2025**

**Activities Completed**

RACER completed a semi-annual groundwater monitoring event during this reporting period. RACER prepared and submitted to USEPA the combined semi-annual progress and data report for the second half of 2024 and worked on preparing the first half of 2025 report. On April 11, 2025, RACER recorded an Environmental Restrictive Covenant (ERC) on the southern portion of the property after completing clarifications and modifications to the ERC as requested by IDEM. On June 13, 2025, RACER submitted a draft Long-Term Stewardship (LTS) Plan to USEPA for managing the institutional controls and groundwater monitoring. RACER continued finalizing the Corrective Measures Implementation Report, which documents the execution of the selected Corrective Measures.

**Status**

RACER will finalize the LTS Plan upon completing any clarifications or modifications requested by USEPA during its review. RACER will complete semi-annual groundwater monitoring during the second half of 2025. RACER will prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

RACER is awaiting comments from USEPA on the proposed LTS submitted in June 2025. RACER completed a semi-annual groundwater monitoring event during this reporting period. RACER prepared and submitted to USEPA the combined semi-annual progress and data report for the first half of 2025 and worked on preparing the second half 2025 report.

**Status**

RACER will finalize the LTS Plan upon completing any clarifications or modifications requested by USEPA. RACER will complete semi-annual groundwater monitoring during the first half of 2026. RACER will prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Worked with property owner IEDC to complete the semi-annual groundwater sampling event for selected wells during this reporting period. Significant construction activities including building construction, utility installation, and roadway construction are occurring on-Site. RACER met with the new IDEM Project Manager to discuss project transition and recent Site updates.

Vapor intrusion and mitigation activities south of the Site continued. RACER continued to monitor property transfers in the VI Focus Area and contacted new owners of transferred properties to explain the investigation activities and attempt to gain access to sample previously inaccessible residences. Two mitigation systems were inspected, and a repair was made to one system because of damage by the property owner.

**Status**

Continue to work with IDEM to evaluate groundwater data at and downgradient from the Site as it relates to potential vapor intrusion. Complete annual VI mitigation system OMM inspections, as needed, in 2025. A soil No Further Action (NFA) was issued by IDEM in 2014. IDEM issued a 'Ready for Anticipated Use' in September 2024. RACER awaits IDEM issuance of a 'Corrective Action Complete with Controls' determination for the Site and an NFA determination letter that covers all the on-Site SWMUs and AOCs (aka AOIs) for which all the work has been done.

RACER completed the semi-annual groundwater sampling event during the first half of 2025.

RACER prepared the 2024 Progress Report for submittal to IDEM during the second half of 2025. RACER included an updated groundwater monitoring plan in the 2024 Progress Report, based on analytical data trends and reduction in the TCE plume. The updated groundwater monitoring plan will be implemented in Fall 2025, with IDEM's concurrence. RACER will work with the IEDC as it continues to redevelop the Site.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Worked with the IEDC (property owner) to complete the semi-annual groundwater sampling event for selected wells during this reporting period. Significant construction activities including building construction, utility installation, and roadway construction are occurring at the Site. Elanco Animal Health opened their global headquarters on the property on October 1, 2025.

Vapor intrusion and mitigation activities south of the Site continued. RACER continued to monitor property transfers in the VI Focus Area and contacted new owners of transferred properties to explain the investigation activities and attempt to gain access to sample previously inaccessible residences. Four mitigation systems were inspected, and minor repairs were made during this reporting period. No significant deficiencies were found.

RACER submitted the 2024 Progress Report to IDEM on July 25, 2025. RACER included an updated groundwater monitoring plan and a reduction in the VI Focus Area based on analytical data trends and reduction in the TCE plume. The updated groundwater monitoring plan was implemented in Fall 2025.

**Status**

Continue to work with IDEM to evaluate groundwater data at and downgradient from the Site as it relates to potential vapor intrusion. RACER is waiting for IDEM's response regarding the proposal to stop monitoring vapor intrusion off-Site and cease operation and maintenance of the installed VI mitigation systems due to the reduction of VOC concentrations in groundwater. Until IDEM makes a determination in this regard, RACER will continue to complete annual VI mitigation system OMM inspections, as needed, throughout the sampling area. A soil NFA was issued by IDEM in 2014. IDEM issued a 'Ready for Anticipated Use' in September 2024. RACER awaits IDEM issuance of a 'Corrective Action Complete with Controls' determination for the Site and an NFA determination letter that covers all the on-Site SWMUs and AOCs (aka AOIs) for which all the work has been done.

Updated through December 31, 2024

**Site 11910 - Indianapolis Stamping Cont'd**

RACER will complete the semi-annual groundwater sampling event and prepare an annual Progress Report for submittal to IDEM during the first half of 2026. RACER will update the groundwater monitoring plan as needed, based on analytical data trends and overall plume footprint and migration. RACER will work with the IEDC as it continues to redevelop the Site.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Updated the Site-wide risk assessment prepared as a part of the 2014 RCRA Facility Investigation (RFI) Report.

Submitted the updated supplemental RFI work plan to IDEM on January 8, 2025, to address the IDEM comments on the original RFI work plan. The work plan is currently with IDEM for review.

**Status**

Corrective Action continues at the Site. A draft Corrective Measures Proposal (CMP) will be prepared concurrently with the draft RFI Report update following implementation of the approved RFI work plan. An Environmental Restrictive Covenant (ERC) will be recorded once the RFI Report and CMP are approved by IDEM.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Received approval from the IDEM on the RFI Update Work Plan. The approval of the RFI Update Work Plan was contingent on the addition of several items, and the RFI Update Work Plan Addendum was prepared to outline how those would be addressed. The RFI Update Work Plan Addendum was approved by IDEM.

Commenced the RFI Update Work Plan field work preparation.

Completed low flow groundwater sampling of monitoring wells across the Site. Samples were submitted for analysis for VOC and MNA parameters to support CMP preparation.

**Status**

Corrective Action continues at the Site. A draft CMP will be prepared concurrently with the draft RFI Report update following implementation of the approved RFI Update Work Plan. A revised ERC will be submitted to IDEM for review; the RFI Report and CMP have already been approved by IDEM.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

In accordance with the approved Groundwater Monitoring Plan, GHD completed groundwater and surface water sampling between April 16 and May 2, 2025.

**Status**

IDEM has supported CA Determination for Tract A, Tract B (North), Tract B (Central), Tracts C to F, and Crawford Field. Corrective Action OMM continues at the Site with IDEM oversight.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

In accordance with the approved Groundwater Monitoring Plan, the draft 2025 Groundwater Monitoring Report was prepared by GHD and sent to RACER for review on November 20, 2025.

**Status**

IDEM has supported CA Determination for Tract A, Tract B (North), Tract B (Central), Tracts C to F, and Crawford Field. The draft 2025 Groundwater Monitoring Report review is under way and submittal of this report will be completed by February 15, 2026. Corrective Action OMM continues at the Site with IDEM oversight.

**IN – State – Site 13250 - Former AGT Surface Impoundment**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

RACER completed RCRA inspections for first and second quarters and downloaded data from transducers placed in select monitoring wells. RACER continued the groundhog trapping program in 2025. RACER collected annual groundwater samples in May and will report findings in accordance with the Post-Closure Permit. RACER received approval from the municipal water company to complete pumping from the extraction wells; 723,468 gallons of water were extracted and discharged during the 2024-2025 pumping event. RACER completed the first of two semi-annual groundwater gauging events after the pumping event.

**Status**

RACER will continue to complete activities in accordance with the Permit. RACER will prepare and submit the groundwater statistical evaluation of samples collected in May 2025 and complete the second of two semi-annual groundwater gauging events.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Post-Closure Permit activities were completed. RACER completed RCRA inspections for third and fourth quarters and downloaded data from transducers placed in select monitoring wells. The groundhog trapping program continued in 2025.

RACER collected the annual groundwater samples in December and will report findings in accordance with the Permit. In October, RACER completed the second of two semi-annual groundwater gauging events after the pumping event, and it was determined that operation of the extraction wells was required to create a larger groundwater head differential between the inside and outside of the slurry wall. RACER is working with the municipal sewer authority for approval to discharge and IDEM has been notified. In December, RACER collected groundwater samples to evaluate groundwater quality downgradient from the surface impoundment.

RACER prepared an evaluation of conditions related to the property in anticipation of the Post Closure Permit expiration in 2027.

**Status**

RACER will continue to complete activities in accordance with the Post Closure Permit issued by IDEM. RACER will prepare and submit the annual report and the groundwater statistical evaluation of samples collected in December 2025, operate extraction wells once approval from the municipal sewer authority is received, and complete the first of two semi-annual groundwater gauging events after pumping.

**KANSAS**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Prepared and submitted to KDHE the 2024 annual inspection report to support the Environmental Use Control (EUC) recorded for the Site.

**Status**

No change in status. RACER will continue long-term groundwater monitoring as approved by Corrective Action Plan and continue to evaluate data from monitoring wells at adjacent GM Fairfax Assembly Plant wells down-gradient of TMW-127 AOC.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Performed the 2025 annual long-term monitoring event on July 14-16, 2025, which included a KDHE-approved reduction in sampling frequency for selected monitoring wells.

Prepared and submitted the 2025 annual long-term groundwater monitoring report to KDHE on October 14, 2025.

Completed the annual inspection to support the EUC on December 8, 2025.

**Status**

No change in status. RACER will continue annual long-term groundwater monitoring to evaluate ongoing natural attenuation of chemicals of concern in groundwater in accordance with the approved corrective action.

## **MASSACHUSETTS**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Submitted Year 17 OMM Report for site. A semi-annual inspection was conducted in February 2024 (Year 18). The event consisted of performing an inspection of the landfill and documenting and performing maintenance of the landfill cap and storm water control features. Completed heavy landscape maintenance event which included removal of Japanese knot weed and overgrown vegetation, including in the wetlands area.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

In accordance with the OMM Plan, Year 19 (2025) activities conducted at the Site included: two semi-annual inspection and maintenance events of the engineered barrier and stormwater control features (completed in February and October); two landscaping events to remove invasive species and vegetation at the stormwater control features (completed in May/June and October); and a monitoring event in October 2025, including collection of groundwater, sediment, and surface water samples for analysis of SVOCs and metals. Additional confirmatory groundwater samples were collected and analyzed for PFAS in April 2025. All OMM activities were documented in the Year 19 Annual Report (GHD, December 2025) and submitted to MADEP.

**Status**

No change in status.

## MICHIGAN

**RACER has completed Environmental Action work at the following Sites; no further Environmental Action is planned or anticipated at such Sites except for the monitoring of restrictive covenants. Therefore, this edition of the Environmental Action Status Reports does not, and future editions will not include separate sections for each of these Sites.**

MI – EPA – Site 10060 – Van Buren Vacant Land  
MI – EPA – Site 11080 – Textile Road  
MI – EPA – Site 11950 – GMPT Livonia  
MI – EPA – Site 13080 – PCC-West  
MI – State – Site 10010 – Pontiac EDC  
MI – State – Site 10020 – Romulus Engineering Center  
MI – State – Site 10050 – Former Howard Warehouse  
MI – State – Site 11010 – 6560 Cass Avenue  
MI – State – Site 12920 – Davison Road Landfill  
MI – State – Site 12940 – 6241 Cass Avenue  
MI – State – Site 12960 – Dort Highway  
MI – State – Site 12981 – GLTC Land  
MI – State – Site 13100 – ACC Penske

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

IU G - Former Nodular Iron Plant OMM:

- Submitted the 2024 PFAS results summary report to USEPA in April 2025.
- Submitted the 2024 mixing zone compliance monitoring results report to EGLE and USEPA in May 2025.

IU H - WWTF Closure: None.

IU I – Classified Sands: None.

RCRA Reporting and Other Reporting

- Prepared for and participated in a virtual meeting with USEPA and EGLE on March 4, 2025, to discuss the mixing zone compliance monitoring, wetland delineation/potential water-related joint permit pre-application meeting, and possibility of backfilling the Secondary Pond and Lagoon 5. Further discussed with USEPA the 2024 PFAS sampling results and updating the Corrective Measures Proposal (CMP).
- Resubmitted 2023 mixing zone compliance monitoring results and 2024 wetland information memorandum to EGLE in March 2025.
- Submitted semi-annual progress report to USEPA in April 2025.
- Submitted draft soil import memorandum in June 2025 providing details on material being considered for potential import and stockpiling.
- Participated in virtual meeting with USEPA on January 14, May 12, May 23, and July 14, 2025, to discuss current status and next steps.
- Continued revising the CMP.
- Prepared and submitted a draft Declaration of Restrictive Covenant (DRC) (1 of 5) to USEPA in June 2025.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

IU G - Former Nodular Iron Plant OMM: Completed the annual mixing zone compliance monitoring event in December 2025.

IU H - WWTF Closure: None.

IU I – Classified Sands: None.

RCRA Reporting and Other Reporting

- Received comments from USEPA on July 17, 2025, regarding the June 2025 Pond Fill-in Work Plan.
- Participated in routine virtual progress meetings with USEPA on July 14, August 25, and September 24, 2025, to discuss current status and next steps.
- Submitted semi-annual progress report to USEPA in October 2025.
- Prepared and submitted the Data Evaluation Revision Technical Memorandum on November 14, 2025. This memorandum compared historical data with the updated Part 201 Generic Cleanup Criteria published in October 2023 in support of revising the CMP.
- Received comments from USEPA on June 2025 draft DRC (1 of 5).
- Began preparing report to document results of the Fall 2025 groundwater monitoring event.
- Continued revising the CMP.

**Status**

No change in status

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Agreements/Work Plans/Reports

- Submitted Fall 2024 groundwater sampling report March 3, 2025.
- Submitted Semi-Annual Progress Report (October 1-March 30, 2025) to USEPA on April 15, 2025.
- Received notice from USEPA that EGLE had completed sampling of private wells at seven properties and all samples collected were non-detect for all PFAS analytes.

Site Investigation:

Completed Spring 2025 semi-annual groundwater sampling event in late June/early July 2025.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Agreements/Work Plans/Reports

- Submitted Semi-Annual Progress Report (April 1 through September 30, 2025) to USEPA on October 29, 2025.
- RACER submitted Draft Declaration of Restrictive Covenant to USEPA on September 30, 2025.

Site Investigation:

- Completed repairs to MW-33 and Fall 2025 semi-annual groundwater sampling in November 2025.
- Submitted Soil Investigation Report and Fill Assessment Report, completed with funding from the Detroit Regional Partnership, to USEPA on December 15, 2025.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Corrective Measures – General & Institutional Controls:

- Conducted routine project update calls with USEPA in January, February, and May 2025.
- Submitted July-December 2024 Semi-Annual Progress Report to USEPA on January 17, 2025. In response, USEPA provided a comment in February 2025, and a revised final report was submitted to USEPA in June 2025.
- Submitted Additional Scope of Work for RCRA Facility Investigation to USEPA in January 2025. USEPA provided an approval letter in February 2025.
- Submitted revised Draft Former Fiero Parking Lot Historical Summary Memorandum and Request for Determination for Property Not Being Regulated Under RCRA, including Corrective Action, and Not Being Covered Under Administrative Order RCRA-05-2011-00019, in April 2025. USEPA provided comments via email in May 2025.

Corrective Measures – Groundwater/LNAPL: Submitted Final 2024 LNAPL Assessment Update – MWM32-04 and TW-MD-06, in January 2025, summarizing additional LNAPL gauging and select groundwater sampling related to these two wells. USEPA provided an approval letter in February 2025.

Corrective Measures – Groundwater Monitoring:

- Submittal of 2025 Fiero Temporary Groundwater Monitoring Plan (TGMP) to USEPA via email in March 2025; USEPA approved via email in March 2025.
- Conducted semi-annual groundwater and soil vapor monitoring at Former Fiero properties in March 2025, per USEPA approved 2025 TGMP.
- Sampled the two newer SVMPs installed south of MWOS-10 in March and June 2025. This completed four quarters of consecutive sampling for the two new points.
- Submitted Draft 2024 Fiero TGMP Summary Report in April 2025. USEPA provided comments via email in May 2025 and a response to comments was provided to USEPA in June 2025.
- Submitted Final SVMP Installation and Sampling Memo to USEPA in June 2025, in accordance with USEPA's February 2025 approval letter.
- Submitted Draft 2024 Annual Groundwater Monitoring Report to USEPA in June 2025.

Corrective Measures – Soil: Completed additional soil sampling in May 2025 as outlined in the USEPA-approved Additional Scope of Work for RCRA Facility Investigation.

Sampling for PFAS:

- Sampled a storm sewer in January 2025, per the USEPA-approved December 2024 PFAS Storm Sewer Sampling Work Plan.
- Submitted the Draft PFAS Storm Sewer Sampling Results Memo to USEPA in April 2025. USEPA emailed its comments on the Draft Memo in May 2026 and RACER responded to those in June 2025, along with the Final PFAS Storm Sewer Sampling Results Memo.

Storm Sewers/Montcalm Seep:

- Conducted routine OMM associated with the Montcalm Street Seep Control System; measures to prevent seepage of groundwater from the Site onto Montcalm Street continue to be successful.
- Presented Montcalm Street Seep Background, Remedy Options Evaluation, Optimization, and Recommendations slides to USEPA, including ORD, in April 2025.
- Emailed Montcalm Street Seep Control Discharge Hose Reconfiguration request to USEPA in May 2025; USEPA emailed approval in May 2025.
- Completed hose reconfiguration activities in late May and June 2025 and subsequently completed follow-up observations. RACER emailed USEPA an update on these activities in June 2025.

Joslyn Avenue Investigations: No activities related to Joslyn Parcels were completed this period.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Corrective Measures – General & Institutional Controls:

- Conducted routine project update calls with USEPA in July, August, September, November, and December 2025.
- Submitted January-June 2025 Semi-Annual Progress Report to USEPA on July 15, 2025.
- Completed select monitoring well repairs in July 2025 and placed monitoring well protection barriers at select wells at Former Fiero Assembly in September 2025.
- Conducted annual inspections of monitoring wells, SVMPs, and PCB cap areas in October and November 2025.
- Revised Draft Former Fiero Parking Lot Historical Summary Memorandum and Request for Determination for Property Not Being Regulated Under RCRA, including Corrective Action, and Not Being Covered Under Administrative Order RCRA-05-2011-00019, in April 2025, based on USEPA's emailed comments in May 2025. Memo to be submitted in January 2026.

Corrective Measures – Groundwater/LNAPL: No activities related to Groundwater/LNAPL were completed this period.

Corrective Measures – Groundwater Monitoring:

- Conducted semi-annual groundwater and soil vapor monitoring at Former Fiero properties in September 2025, per USEPA approved 2025 TGMP.
- Submitted Final 2024 Fiero TGMP Summary Report to USEPA in August 2025.
- Conducted the 2025 annual groundwater sampling event in September 2025, per USEPA discussion and conditionally-approved draft 2025 GMP.
- Submitted Final 2024 Annual Groundwater Monitoring Report to USEPA in October 2025.
- Conducted additional groundwater sampling event of select wells at Fiero Properties in November 2025.

Corrective Measures – Soil:

- Submitted Additional RCRA Investigation Scope of Work (Third Phase) to USEPA and received approval in September 2025.
- Conducted Additional RCRA Investigation soil sampling in September 2025.
- Submitted Additional RCRA Investigation Scope of Work (Fourth Phase) to USEPA and received approval in December 2025.
- Conducted Additional RCRA Investigation soil sampling in December 2025.

Sampling for PFAS: Sampled a storm sewer in July 2025.

Storm Sewers/Montcalm Seep:

- Conducted routine OMM associated with the Montcalm Street Seep Control System; measures to prevent seepage of groundwater from the Site onto Montcalm Street continue to be successful.
- Submitted the Montcalm Seep Interim Measure Re-evaluation Memo to USEPA on October 29, 2025.

Joslyn Avenue Investigations: Conducted annual groundwater sampling of select monitoring wells at the Joslyn South Parcel property in September 2025. Re-sampled one location in December 2025.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Select Surface Cover Inspection: Completed the semi-annual inspection of select surface cover areas.

Maintain Booms on Outfalls: Completed inspections and boom maintenance (as necessary) of Outfalls 003 and 005, as required by the April 2025 WRD ACO. Visual observations of these two outfalls were completed following each qualifying wet weather event.

Agency Coordination/Negotiation, Reporting, and Project Management/Coordination:

- Prepared and submitted Semi-Annual Report No. 6 July-December 2024 to EGLE on January 22, 2025.
- Inspected P-traps associated with Leith Street underpass French drain (which discharges into the Outfall 005 storm sewer) in January 2025.
- Met with City of Flint on April 16, 2025, to discuss Outfall 011 Reroute.
- Held virtual meetings with EGLE on April 30 and May 14, 2025, to discuss Hamilton and Industrial Avenues area activity updates, Outfall 011 Reroute update, ACO, Short-Term Construction Monitoring (STCM) Sampling, and digital Conceptual Site Model (dCSM).
- Held virtual meeting with EGLE on June 11, 2025, to discuss Hamilton Ave and Industrial Ave updates, Tracer Test data and evaluation, STCM 2024 Summary Report update, and Site cleanup progress.
- Submitted 2024 STCM Update Memo to EGLE on June 9, 2025.
- Completed 2025 STCM Sampling in March and June 2025.
- Provided Outfall 011 Reroute bid package to possible bidders on May 22, 2025; held on-Site bid walk with potential bidders on May 29; received bids on June 20; requested additional information from bidders on June 24; received responses with additional information on July 3.
- Completed Site maintenance activities and monitoring well inventory of select MWs in June 2025.
- Developed Site dCSM in June 2025 to aid in evaluation, visualization, and discussion of Site-wide data.

Compliance:

- Completed and submitted monthly Discharge Monitoring Reports (DMRs), as required by the NPDES permit, in January, February, March and April 2025. The NPDES permit was terminated by EGLE following finalization of WRD ACO.
- Executed WRD ACO in April 2025.
- Submitted final National Pollutant Discharge Elimination System (NPDES) Pollutant Minimization Plan (PMP) report to EGLE on May 15, 2025.

Remedy Design, Implementation, and OMM:

- Prepared and submitted Stormwater Treatment Evaluation Work Plan to EGLE on February 12, 2025.
- Submitted Industrial Avenue Sampling Work Plan to EGLE on February 20, 2025.
- Collected samples from sanitary sewer lines within Industrial Avenue in April, May, and June 2025.
- Collected baseline groundwater elevations in select wells in the vicinity of Hamilton Avenue and railroad in preparation for temporarily plugging manhole MH H-1A.
- Completed temporary plugging of inverts within manhole MH H-1A in Hamilton Avenue in May 2025. Completed weekly and post-significant rain precipitation event inspections following plugging.
- Collected samples from sanitary sewers in Hamilton Avenue following temporary plug installation on May 16, 2025.

PFAS Investigation: No PFAS investigation related items completed.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Select Surface Cover Inspection: Completed the annual and semi-annual inspection of select surface cover areas in July and October 2025.

Maintain Booms on Outfalls: Completed inspections of and boom maintenance (as necessary) to Outfalls 003 and 005, as required by the April 2025 WRD ACO. Visual observations of these two outfalls were completed following each qualifying wet weather event.

Agency Coordination/Negotiation, Reporting, and Project Management/Coordination:

- Prepared and submitted January-June 2025 Semi-Annual Report to EGLE on July 30, 2025, which also included a STCM Summary Report of data from monitoring completed in March 2025.
- Inspected P-traps associated with Leith Street underpass French drain (which discharges into the Outfall 005 storm sewer) during STCM in September and November 2025.
- Held virtual meetings with EGLE on July 3, August 14, September 9, October 8, November 5, and December 10, 2025 to provide project status updates on activities completed and planned.
- Completed STCM Sampling in September and November 2025.

Compliance:

- Completed a dry weather sample collection event on August 5, 2025 and a wet weather sample collection event on October 7, 2025, from accessible and flowing Outfalls, to assist in the generation of the ACO required Discharge Point Prioritization Report.
- Held virtual meeting with EGLE on November 17, 2025, to discuss baseline calculations to be included in the Discharge Point Prioritization Report due to EGLE in January 2026.
- Modifications were completed on December 12, 2025, at select outfall locations for safety and ease of access during routine sampling required by ACO to begin in 2026.
- Stormwater discharge/flow was measured on December 22-24, 2025, at accessible outfall points along the Flint River.

Investigation and Sampling:

- Held virtual meeting with EGLE on October 8, 2025, to review initial evaluation and proposed next steps for potential off-Site vapor intrusion.
- Submitted Building 44 Well Abandonment Work Plan to EGLE on September 24, 2025, and received EGLE verbal approval during a virtual meeting and subsequently via a letter dated December 4, 2025.
- Completed monitoring well abandonment activities in December 2025.
- Submitted the Groundwater Sampling Plan – Phase I Vapor Intrusion Work Plan to EGLE on December 12, 2025.

Remedy Design, Implementation, and OMM:

- Completed temporary plugging of inverts within manhole MH-E-1 Northwest lateral to MH-H and north lateral to MH-G on July 3, 2025.
- Following plugging activities, collected samples from sanitary sewers in Hamilton Avenue and James P. Cole on July 15, 2025.
- Held virtual meeting with EGLE on August 20, 2025, to discuss revisions needed to the November 2023 Part 111 Declaration of Restrictive Covenant.
- Held virtual meeting with EGLE on September 23, 2025, to discuss plugging and bulkheading that had been completed over the years and proposed inspections of select plugs and bulkheads.
- Submitted James P. Cole Sewer Upgradient Sampling Plan to EGLE on October 1, 2025, and received EGLE verbal approval during a virtual meeting and subsequently via a letter of November 12, 2025.
- Submitted Industrial Avenue Sanitary Video Inspection Work Plan to EGLE on October 9, 2025, and received EGLE comments and conditional approval via email on October 10, 2025. Provided a response to comments via email on October 13, 2025.
- Completed Industrial Avenue sewer line jetting on October 13, 2025, and completed a video inspection of the sewer on October 14, 2025.
- Re-inflated temporary plugs installed in MH-H-1A and MH-E-1 in Hamilton Avenue and sampled select sanitary sewer manholes in Hamilton Avenue, James P. Cole Boulevard, and locations upgradient from James P. Cole on October 14, 2025.
- Submitted Building 44 Pre-Design Investigation Work Plan to EGLE on October 15, 2025.
- Held virtual meeting on October 22, 2025 with EGLE MMD RAT to discuss the proposed groundwater extraction trench and treatment system remediation approach and the Building 44 Pre-Design Work Plan. Received approval of the rapid small-scale column test (RSSCT) portion of the plan via email on November 17, 2025.

**Site 12950 - Buick City Cont'd**

Received the RAT summary report including comments on November 18, 2025. Provided responses and received follow-up comments/acceptance to the Building 44 Pre-Design Investigation Work Plan comments that were included in the RAT Report via several emails prior to November 21, 2025.

- Completed geophysics investigation November 17-31, 2025, in the vicinity of the proposed groundwater extraction trench location.
- Completed vertical delineation soil borings November 24-26, 2025, and based on observations made during installation of these borings and discussion with EGLE, monitoring wells were not installed.
- Completed geophysics confirmation soil borings from December 1-12, 2025.
- Completed bulk groundwater collection on December 8-11, 2025, for use in the RSSCT that will test granular activated carbon (GAC) and ion exchange (IX) resin.
- Completed additional sampling of select sanitary sewer manholes in James P. Cole Boulevard and locations upgradient from James P. Cole on December 17, 2025.

**PFAS Investigation:**

- Submitted 2025 Groundwater PFAS Sampling Plan to EGLE on October 1, 2025; received verbal approval during a virtual meeting and subsequently via a letter dated December 1, 2025.
- Completed the PFAS groundwater sampling event on November 17-21, 2025.

**Status**

Because of the unexpected high bids received to implement the Outfall 011 Reroute interim measure and the identification of an apparent more cost-effective interim measure alternative, RACER proposed to EGLE a groundwater hydraulic control system that includes an extraction trench and treatment system to address PFOS-impacts in Outfall 011. Based on EGLE's initial acceptance of the proposed interim measure, RACER will pursue implementation of that alternative with EGLE's oversight. Otherwise, no change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Groundwater Monitoring: Completed semi-annual groundwater monitoring event in March 2025.

Agency Coordination/Negotiation, Reporting & Project Management:

- Prepared Second Half 2024 Progress Report and submitted to USEPA on January 10, 2025.
- Submitted draft Exposure Pathway Evaluation to USEPA on January 29, 2025; received USEPA comments re the Evaluation on April 4, 2025; and began revising the Evaluation to address USEPA comments.
- Prepared Data Report summarizing the March 2025 groundwater monitoring event and submitted to USEPA on May 27, 2025.
- Abandoned monitoring well MW-101S on March 18, 2025, as approved by USEPA.
- Began preparing First Half 2025 Progress Report.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Groundwater Monitoring: Completed semi-annual groundwater monitoring event in September 2025.

Agency Coordination/Negotiation, Reporting & Project Management

- Prepared First Half 2025 Progress Report and submitted to USEPA on July 14, 2025.
- Submitted response to USEPA's April 4, 2025 comments on the draft Exposure Pathway Evaluation and a revised draft Exposure Pathway Evaluation to USEPA on November 4, 2025.
- Prepared Data Report summarizing the September 2025 groundwater monitoring event and submitted to USEPA on December 29, 2025.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025****Activities Completed**

Corrective Action OMM: Continued with the evaluation of the groundwater pumping operations to manage groundwater elevations within the Area 1 barrier wall following Area 1 Interim Measure implementation. Following the GWTP's shutdown pilot test that commenced in March 2024, fewer gallons of groundwater – approximately 57,688 -- were collected and discharged during this time frame. The renewed GLWA Special Discharge Permit is effective through December 31, 2025. Conducted monitoring of effluent and reported results as required. Collected groundwater elevation measurements periodically within Area 1 to evaluate groundwater elevations.

Off-Site (AOI31) Vapor Intrusion Evaluation: Submitted responses to comments for various documents. Completed several rounds of field investigation of soil gas and groundwater. Reported several rounds of results for both liquid and vapor samples collected from the sanitary sewer main lines in the AOI 31 area. Planned detailed investigation of laterals connected to the sanitary sewer main line along the eastern portion of Grantland Street. Completed a seasonal sampling event of the current monitoring network for groundwater and soil gas. Installed a passive barrier to intercept impacted groundwater plume upgradient of Newburgh Village Senior Living Facility.

Area 1 Remedy Implementation: Continued monitoring activities associated with Area 1 French Drain Collection System/Groundwater Treatment Plant Pilot Shutdown Work Plan which started on March 28, 2024.

PFAS: Collected groundwater samples in March 2024 as part of the Area 1 Construction Groundwater Monitoring Plan and the Revised Interim Measures Work Plan to monitor PFAS groundwater impacts and effectiveness of the Area 1 soil-bentonite barrier wall and integrated cap and the ongoing Pilot Shutdown.

**Status**

Based on USEPA's comments, additional groundwater and soil vapor investigation monitoring in the Grantland Street Neighborhood and Newburgh Village Senior Living Facility and inspection and performance evaluation of two vapor mitigation systems continue. Additional sampling and remedy to be completed in the mid-plume area and sanitary sewer main line along Grantland Street.

**JULY 1, 2025 thru DECEMBER 31, 2025****Activities Completed**

Corrective Action OMM: The renewed GLWA Special Discharge Permit is effective through December 31, 2027. As a result of the GWTP's shutdown pilot test begun in March 2024, the groundwater collection and treatment system collected and discharged no groundwater during this timeframe. Submitted semi-annual reports to GLWA as required. Collected groundwater elevation measurements and groundwater samples periodically within Area 1 to evaluate groundwater elevations and concentrations as part of the continued shutdown evaluation.

Off-Site (AOI31) Vapor Intrusion Evaluation: Submitted Proposed Sanitary Sewer Lateral Vapor Sampling Work Plan, a Proposed In-Home Response Activity Work Plan, a Proposed Interim Sewer Rehabilitation Work Plan responded to comments and submitted revised work plans. Submitted a sewer video inspection summary, draft resident information letters, fact sheets and access agreements to USEPA for review, results data packages for several sanitary sewer vapor sampling events, residential plumbing inspections, and indoor air sampling events. Submitted a March 2025 Winter Seasonal Groundwater and Soil Vapor Sample Results for AOI 31 Tech Memo. Implemented sanitary sewer sampling activities, residential plumbing inspection and indoor air sampling activities, and sanitary sewer lateral rehabilitation activities for three lateral connections along Grantland Ave. Completed quarterly AOI 31 Leading Edge Interim Measure Performance Monitoring activities. Conducted an inspection and performance evaluation of the Home 7 and Home 8 vapor mitigation systems during October 2025. Discussed results with USEPA, EGLE, City of Livonia, and residents, as applicable.

Area 1 Remedy Implementation: Continued monitoring activities associated with Area 1 French Drain Collection System/Groundwater Treatment Plant Pilot Shutdown Work Plan which started on March 28, 2024.

Updated through December 31, 2025

**Site 13020 – Eckles Road Cont'd**

PFAS: Collected groundwater samples September/October 2025, as part of the Area 1 Construction Groundwater Monitoring Plan, the Revised Interim Measures Work Plan, and the Area 1 Groundwater Treatment Plant Pilot Shutdown Work Plan to monitor PFAS groundwater impacts and effectiveness of the Area 1 soil-bentonite barrier wall and integrated cap and the ongoing Pilot Shutdown.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Groundwater Monitoring: None.

Reporting: None. USEPA shared with MPART the results of sampling for PFAS.

PCB Soils Closure: None.

Corrective Action Reporting: None

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Groundwater Monitoring: None.

Reporting: None.

PCB Soils Closure: None.

Corrective Action Reporting: None

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

LNAPL Recovery System Installation: No activity during this period.

Implement RAP, Site OMM:

- Performed annual inspection of the Former Plant Slab Soil Cover Area, I27.7 Manhole Area, Quench Pit Area, Former Southwest LNAPL Area, Former Railyard Area soil cover, Stormwater Pond, Secondary Settling Pond, River Berm Area, Green Point Landfill, and the two Terminated Type III Landfills during the monitoring event on April 18, 2025.
- Removed woody growth and filled small animal burrows observed on the Type III landfills on April 18, 2025.
- Filled and restored cover of animal burrows/sinkhole in the Former Plant Slab Soil Cover on May 20, 2025.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

LNAPL Recovery System Installation: No activity during this period.

Implement RAP, Site OMM:

- Performed annual groundwater monitoring event from August 18-21, 2025, including gauging of the Quench Pit LNAPL Area monitoring wells and manholes in the Southwest Plant LNAPL Area.
- Began preparing the annual progress report for submittal to EGLE.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Revision to RAP, Consent Judgment, and OMM Plan: Continued preparation of the storm sewer modification construction completion report. Continued preparation of a revised Declaration of Restrictive Covenant (DRC).

Submitted 2024 Annual Technical Progress Report to EGLE in January 2025.

Submitted request in June 2025 to modify the previous EGLE-approved permanent marker.

Hydraulic Control & Treatment of Extracted Groundwater to PCB Permit Limits: Continued to operate the groundwater extraction and treatment system.

Site OMM Activities: Completed required monthly inspections of the cap and containment system, as well as maintenance and level monitoring of Crotty Street Channel (CSC) and Materials Storage Area (MSA) groundwater extraction systems.

Completed repair activities to address EGLE’s April 2024 Corrective Action Monitoring and Maintenance (CAMP) Inspection Report.

**Status**

On-going OMM will continue. Storm water modifications are complete. Efforts continue to revise and record an updated DRC and to install the required permanent marker.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Revision to RAP, Consent Judgment, and OMM Plan: Continued preparation of the storm sewer modification construction completion report. Continued preparation of a revised DRC.

Hydraulic Control & Treatment of Extracted Groundwater to PCB Permit Limits: Continued to operate the groundwater extraction and treatment system.

Site OMM Activities: Completed required monthly inspections of the cap and containment system, as well as maintenance and level monitoring of CSC and MSA groundwater extraction systems.

Completed repair activities to address EGLE’s September 2025 CAMP Inspection Report.

In accordance with the OMM Plan, an annual monitoring event was conducted in September 2025.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

OMM and Reporting:

- The soccer association leasing the Site performed necessary maintenance of the soil and vegetative cover.
- The 2025 annual soil cover inspection will be completed in Fall 2025.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

OMM and Reporting:

- The 2025 annual soil cover inspection was completed on December 30, 2025, and the results will be summarized and submitted to EGLE during the first quarter 2026. No significant issues were identified during the inspection.
- The soccer association leasing the Site performed necessary maintenance of the soil and vegetative cover.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Ongoing Landfill OMM:

- Performed routine Landfill OMM and prepared and submitted the required reports.
- Prepared Semi-Annual Post-Closure Groundwater Monitoring, Leak Detection System, and Landfill Inspection reports and submitted them to EGLE on February 28, 2025.
- Performed semi-annual groundwater monitoring well and leak detection vault sampling during the week of June 2, 2025.

PFAS Investigation: Conducted annual PFAS groundwater and LDS sampling event the weeks of June 2 and June 9, 2025.

PFAS Corrective Measures Evaluation and Implementation:

- Completed sampling of private water supply wells on March 26 and April 4, 2025. Received approval from EGLE via letter on March 17, 2025, to reduce monitoring frequency from quarterly to semi-annually.
- Prepared and submitted a Storm Sewer Evaluation Update on January 10 and May 9, 2025, summarizing the results of the October 2024 and March 2025 sampling events.
- Mobilized temporary PFAS treatment system to the Western Pond and began operation on April 14, 2025, which was operated until June 28, 2025, to remove PFOS prior to discharge to the municipal storm sewer system. A pilot-scale study was conducted concurrently with the Spring 2025 dewatering event to evaluate the adsorption capacity/performance of FLUORO-SORB®.
- Continued evaluation of a stationary treatment system concept, including bench-scale laboratory studies, if appropriate.
- Prepared and submitted Stanley Road Sanitary Sewer Update and a West of Site Sanitary Sewer Update on March 20, 2025, summarizing the results of the December 2024 sampling event.
- Conducted First Quarter 2025 storm water inspection on March 20, 2025, and Second Quarter 2025 storm water inspection on June 26, 2025.
- Collected pond samples (SW-13 and SW-15) from the Middle and Western Ponds on April 17, 2025.
- Conducted inspection of the middle berm on June 4, 2025.
- Conducted CCTV camera inspection of select storm sewers adjacent to the southern boundary of the Site along Coldwater Road on June 9, 2025.
- Collected storm water samples from off-Site sewer lines on June 19, 2025.
- Prepared and submitted PFAS Activity Progress Report on April 11, 2025.
- Collected samples from sanitary sewer manholes on June 26, 2025.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Ongoing Landfill OMM:

- Performed routine Landfill OMM and prepared and submitted the required reports.
- Prepared Semi-Annual Post-Closure Groundwater Monitoring and Leak Detection System reports and submitted to EGLE on August 29, 2025.
- Performed semi-annual groundwater monitoring well and leak detection vault sampling during the week of October 27, 2025.
- Conducted annual inspection and sampling for the leachate system sanitary sewer discharge with City of Flint Department of Public Works and Utilities Water Pollution Control on September 29, 2025.

PFAS Investigation: Prepared report documenting results of the annual PFAS groundwater sampling event and submitted to EGLE on September 22, 2025.

**Site 11030 - Coldwater Road Landfill Cont'd**

**PFAS Corrective Measures Evaluation and Implementation:**

- Continued evaluation of a stationary treatment system concept, including bench-scale laboratory studies, if appropriate.
- Prepared and submitted a PFAS Activity Progress Report on July 28, 2025.
- Prepared and submitted a Storm Sewer Evaluation Update on August 1, 2025, summarizing results of June 19, 2025 sampling event.
- Prepared and submitted Stanley Road Sanitary Sewer Update and a West of Site Sanitary Sewer Update on July 29, 2025, summarizing results of June 26, 2025 sampling event.
- Mobilized temporary PFAS treatment system to the Western Pond and began operation on September 15, 2025, and operated until November 15, 2025, to remove PFOS prior to discharge to the municipal storm sewer system. A pilot-scale study was continued from the Spring and conducted concurrently with the Fall 2025 dewatering event to evaluate the adsorption capacity/performance of FLUORO-SORB®.
- Installed a storm sewer patch along Coldwater Road on October 27, 2025 to prevent infiltration of PFOS-impacted water and plugged a sanitary sewer manhole associated with the former plant administrative building on September 4, 2025 to prevent surface venting of water.
- Conducted Third Quarter 2025 storm water and middle berm inspections on September 25, 2025, and Fourth Quarter 2025 storm water and middle berm inspections on December 29, 2025.
- Installed a driveway to access the temporary treatment system area in the western portion of the Site along Saginaw Road during the week of December 8, 2025.
- Prepared and submitted the Stormwater Detention Facility Dam Inspection Report, updated Dam Operations and Maintenance Plan, and updated Emergency Action Plan on December 31, 2025.
- Completed sampling of private water supply wells on October 6 and 9, 2025.
- Collected storm water samples from off-Site sewer lines on December 29, 2025.
- Collected samples from sanitary sewer manholes on December 18, 2025.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

**Additional Site-wide Investigation:**

- Comments on the December 13, 2024, Draft Risk-Based PCB Cleanup Plan (Revision 1) were received from USEPA on June 9, 2025.
- A response from EGLE was received on June 6, 2025, to the draft memorandum summarizing the statistical methodology utilized to calculate the 95% Upper Confidence Level for PAHs that was submitted to EGLE on October 2, 2024. EGLE concurred with the approach.
- Based on EGLE concurring with the statistical methodology utilized to calculate the 95% Upper Confidence Level for PAHs detected on the adjoining railroad property, preparation of a No Further Action (NFA) report was initiated for all contaminants in the area north of 301 36<sup>th</sup> Street SW and for all contaminants except PCBs for the adjoining railroad property.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

**Additional Site-wide Investigation:** Based on EGLE concurring with the statistical methodology used to calculate the 95% Upper Confidence Level for PAHs detected on the adjoining railroad property, preparation of an NFA report was completed for all contaminants in the area north of 301 36<sup>th</sup> Street SW and for all contaminants except PCBs for the adjoining railroad property. The NFA report will be submitted to EGLE in the First Quarter 2026.

**Status**

No change in status.

**JANUARY 1, 2025 thru June 30, 2025**

**Activities Completed**

RI Investigation/Reporting, Work Plans, Soil and Groundwater Investigations:

- Conducted visual inspection of MFM East Side Storm Drain (ESSD) and conducted sampling for PFAS in March and June 2025.
- Performed ongoing work and follow up with EGLE and Michigan Flight Museum (MFM) for ESSD sampling, Outfall/discharge review.
- Temporarily sealed drain tiles connected to catch basins along MFM ESSD to prevent groundwater infiltration in May 2025.
- Conducted recovery of DNAPL at single groundwater monitoring well on one occasion in March 2025.
- Completed groundwater monitoring event of PCE Area in March 2025; groundwater analytical parameters included select VOCs and natural attenuation parameters.
- Performed weekly inspection of waste from DNAPL recovery and groundwater sampling.
- Submitted PFAS Summary report to EGLE in June 2025.
- Had update call with WCAA to review PFAS activities.

Groundwater Collection System: The system remained off through June 2025 and expected to remain off through the remainder of 2025, with no plans for restarting it.

Work ongoing to update deed restrictions and easements for American Center for Mobility (ACM) to provide for the concurrent redevelopment and remediation of the Site. Ongoing support as needed for redevelopment activities on ACM and MFM properties.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

RI Investigation/Reporting, Work Plans, Soil and Groundwater Investigations:

- Shipped waste from DNAPL recovery and PCE Area groundwater sampling off-Site for disposal in July 2025.
- Conducted sampling for PFAS during wet weather conditions from the MFM East Side Storm Drain (ESSD), 84" Sewer, and 84" Outfall in September 2025. Ambient background (rain) sample also collected for PFAS analysis.
- Submitted data summary memo to EGLE for wet weather sampling from ESSD, 84" Sewer, and Outfall/discharge in November 2025.
- Completed initial field locating activities for Vault E-19 manholes in November 2025.
- Permanently sealed drain tiles connected to catch basins along MFM ESSD to prevent groundwater infiltration in December 2025; work coordinated and completed by MFM.
- PCE Area 2025 GW Sampling Summary Letter submitted to EGLE in December 2025.
- Received update from EGLE regarding new Site EGLE PM in 2026.
- Drafted initial plan for Proposed Long Term Monitoring at the Site for the next 10 years (GW Levels and GW Sampling).
- Drafted well abandonment update for EGLE review and approval based on proposed long-term monitoring plan.

Groundwater Collection System: The system remained off through December 2025. System expected to remain off with no current plans of restarting it.

Work ongoing to update TSCA deed restriction and with ACM to provide for the concurrent redevelopment and remediation of the Site.

Ongoing support as needed for redevelopment activities on ACM and MFM properties.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Groundwater Monitoring: None. RACER proposed cessation of groundwater sampling in No Further Action (NFA) Data Gap Scope of Work and Next Steps letter of January 27, 2025. On April 14, 2025, EGLE agreed with cessation of groundwater sampling at this time, noting that additional groundwater monitoring would likely be necessary for completion of a No Further Action (NFA) Plan.

PFAS Investigation: None.

Closure: On January 27, 2025, an NFA Data Gap Scope of Work and Next Steps letter was submitted to EGLE to address EGLE's comments on the draft NFA Plan. EGLE emailed comments regarding the letter on April 14, 2025. RACER submitted a Response to Comments letter to EGLE on May 31, 2025.

Deed Restrictions: Preparation of a revised draft Declaration of Restrictive Covenant (DRC) on hold.

**Status**

Future activity depends on EGLE's review of the response to comments and subsequent discussions.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Groundwater Monitoring: None.

PFAS Investigation: None.

Vapor Intrusion Investigation: On November 24, 2025, to further evaluate the vapor intrusion pathway in the northern portion of the Site, RACER installed three sets of nested vapor probes (VP-4S/D, VP-5S/D, and VP-6S/D). RACER collected soil gas samples from the vapor probes on December 16, 2025. A letter summarizing the results is being prepared and will be submitted to EGLE during the first quarter of 2026.

Closure: EGLE emailed comments regarding the May 31, 2025, Response to EGLE Comments letter on July 31, 2025. A Response to Comments letter was submitted to EGLE on September 15, 2025. RACER held a virtual meeting with EGLE on October 20, 2025, to discuss specific sampling and cover requirements. RACER submitted a Scope of Work for proposed soil sampling -- to evaluate the middle portion of the Site where no exposure barrier is present -- to EGLE on December 12, 2025. The Scope of Work was approved by EGLE with comments via email on December 29, 2025.

Deed Restrictions: Preparation of a revised draft DRC on hold.

**Status**

Future activity depends on the results of forthcoming soil and soil gas sampling and evaluation.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Post-Closure Care and Maintenance Program: The 2024 semi-annual soil cover inspection results were summarized and submitted by RACER to EGLE on January 10, 2025. No significant issues were identified. On June 10, 2025, RACER completed a semi-annual soil cover inspection for the Windiate Park and Pengelly Road Lot 460 properties. No significant issues were identified. A letter summarizing the results is being prepared and will be submitted to EGLE during the third quarter of 2025.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Post-Closure Care and Maintenance Program: The 2025 semi-annual soil cover inspection results from the inspection of June 10, 2025, were summarized and submitted to EGLE on August 1, 2025. No significant issues were identified.

Completed the second semi-annual inspection for the Windiate Park and Pengelly Road Lot 460 properties on December 30, 2025. No significant issues were identified. A letter summarizing the results is being prepared and will be submitted to EGLE during the first quarter of 2026.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025****Activities Completed****Work Plans, Investigation, and Reporting:**

- Held virtual meeting with EGLE in January 2025 to present evaluation of data collected concurrently by USEPA related to Adams Plating Superfund Site and by RACER related to Lansing Site.
- Held virtual meeting with EGLE and Lansing Board of Water and Light (LBWL) to present quarterly update on remedial progress in January 2025.
- Submitted Revised Biosparge Shutdown Test Proposal to EGLE in January 2025.
- Submitted 2025 Revised Interim Monitoring Work Plan to EGLE in March 2025. EGLE provided conditional approval in March 2025 and based on the conditions, submitted a revised Final 2025 Interim Monitoring Work Plan to EGLE in April 2025. Following plan revision, EGLE approved the 2025 Interim Monitoring Work Plan via email in April 2025.
- Submitted Monitoring Well and Sub-Slab Monitoring Point Abandonment Memo to EGLE in March 2025.
- Submitted Adams Plating Data Review and MW-14-58R Area VI Summary to EGLE in March 2025.
- Submitted First Quarter 2025 Progress Report in April 2025.
- Submitted Lower 1,4-Dioxane Biosparge 2024 Progress Report to EGLE in April 2025.
- Held virtual meeting with EGLE and LBWL to present quarterly update on remedial progress in April 2025.
- Completed select groundwater sampling associated with Plant 6 during the First Quarter of 2025 for assessment of potential off-Site vapor intrusion; a soil gas sample could not be collected at this time since the point was saturated.
- Submitted 2024 Annual Groundwater Monitoring Report in June 2025.

**LNAPL Gauging:** Per the EGLE-approved 2025 Interim Monitoring Plan, LNAPL gauging frequency is annually and will be conducted during the annual groundwater sampling event planned to be completed in fourth quarter of 2025.

**Groundwater Monitoring:** Completed routine and non-routine groundwater monitoring and gauging during the Second Quarter of 2025 per EGLE-approved 2025 Interim Monitoring Plan.

**Storm Sewer Sampling:** Completed routine and non-routine sampling of select storm sewer manholes during the Second Quarter of 2025 per EGLE-approved 2025 Interim Monitoring Plan.

**Soil Corrective Measures:** No soil corrective measures completed this period.

**PFAS Corrective Measures:** Per EGLE-approved 2025 Interim Monitoring Plan, PFAS sampling frequency is annually and will be conducted during the annual groundwater sampling event planned to be completed in fourth quarter 2025.

**Lower 1,4-Dioxane Corrective Measures:**

- Continued routine OMM of the biosparge systems at Plants 2 and 3 with limited downtime.
- Completed non-routine maintenance of biosparge systems as necessary including equipment repairs and well rehabilitation/repair to optimize performance.
- Collected performance groundwater monitoring samples during semi-annual groundwater monitoring event in second quarter 2025, per EGLE-approved 2025 Interim Monitoring Plan.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025****Activities Completed****Work Plans, Investigation, and Reporting:**

- Held virtual meetings with EGLE and LBWL to present quarterly update on remedial progress in July and October 2025.
- Completed exposure barrier annual inspections in July 2025.
- Submitted Second Quarter 2025 Progress Report in July 2025.

**Site 13001 – Lansing Plant 2 Cont'd**

- Completed semi-annual storm sewer sampling in October 2025.
- Submitted 2025 Semi-Annual Groundwater Sampling Report to EGLE in October 2025.
- Submitted Third Quarter 2025 Progress Report in October 2025.
- Completed select groundwater and soil gas sampling associated with Plant 6 in October 2025 for assessment of potential off-Site vapor intrusion.

LNAPL Gauging: Per the EGLE-approved 2025 Interim Monitoring Plan, LNAPL gauging frequency is annually and was completed during the annual groundwater sampling event in the Fourth Quarter 2025.

Groundwater Monitoring: Completed routine groundwater monitoring and gauging during the Fourth Quarter of 2025 per EGLE-approved 2025 Interim Monitoring Plan.

Storm Sewer Sampling: Completed routine sampling of select storm sewer manholes during the Fourth Quarter of 2025 per EGLE-approved 2025 Interim Monitoring Plan.

Soil Corrective Measures: No soil corrective measures completed this period.

PFAS Corrective Measures: Completed during the annual groundwater sampling event in Fourth Quarter 2025 per EGLE-approved 2025 Interim Monitoring Plan.

Lower 1,4-Dioxane Corrective Measures:

- Received conditional approval of the Revised Biosparge Shut Down Test Proposal from EGLE on July 21, 2025.
- Continued routine OMM of the biosparge systems at Plants 2 and 3 with limited downtime.
- Completed non-routine maintenance of biosparge systems as necessary.
- Collected performance groundwater monitoring samples during semi-annual groundwater monitoring event in Fourth Quarter 2025, per EGLE-approved 2025 Interim Monitoring Plan.
- Collected groundwater monitoring samples from select monitoring wells during Third Quarter 2025 as part of the biosparge shut down test.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025****Activities Completed**

Existing Building: Haulaway Building Sub-Slab Depressurization System (SSDS) continues to operate effectively. The last SSDS OMM event took place on July 29, 2024, during which RACER took pressure readings and performed a visual inspection.

Investigation and Reporting: There has been no additional investigation or reporting since the last semi-annual Status Report. RACER's consultant did respond to a Miss Dig call to make sure a monitoring well would not be impacted during earthmoving work and reported there was no risk to the well. As previously reported, the results of the limited 2023 groundwater and soil gas investigation within the utility corridor were compiled into a Facility Investigation Completion Report, which has been finalized and submitted to EGLE. RACER met with EGLE after submittal to review the report. Following confirmation from EGLE, RACER will complete the well abandonment work in 2025 or 2026.

**Status**

With concurrence from EGLE, the next step is to abandon the on-Site monitoring wells. Further activities are dependent on the review and discussion with EGLE; otherwise, no change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025****Activities Completed**

Existing Building: The Haulaway Building SSDS continues to operate effectively. The next SSDS OMM event to take pressure reading and to perform a visual inspection will be scheduled for Summer 2026.

Investigation and Reporting: There has been no additional investigation or reporting since the last semi-annual Status Report for this Site. As previously reported, the results of the limited 2023 groundwater and soil gas investigation within the utility corridor were compiled into a Facility Investigation Completion Report. RACER met with EGLE after submittal of same to review the report. Following direction and confirmation from EGLE, RACER will work to complete the well abandonment work in 2026 or beyond, depending on when EGLE provides its approval of same.

**Status**

With concurrence from EGLE, the next step is to abandon the on-Site monitoring wells. Further activities are dependent on the review and discussion with EGLE; otherwise, no change in status.

**MISSOURI**

**JANUARY 2025 thru JUNE 30, 2025****Activities Completed**

RACER summarized and provided to MDNR (on February 14, 2025) the results of the third quarterly (December 2024) groundwater sampling of each existing shallow and deeper MW for VOCs and sampling of the existing soil vapor monitoring points for methane conducted in accordance with the revised Site Investigation Work Plan (conducted in June 2024). MDNR comments were received on March 3, 2025. RACER summarized and provided to MDNR (on May 7, 2025) the results of the fourth and final quarterly (March 2025) groundwater sampling of each existing shallow and deeper MW for VOCs and sampling of the existing soil vapor monitoring points for methane; MDNR comments in response were received June 3, 2025.

**Status**

Groundwater and methane gas in soil evaluation and revisions to the Site Comprehensive Report are underway. The data suggests that groundwater concentrations are undergoing significant concentration reductions, most likely the result of natural attenuation processes and that, therefore, remediation of groundwater is not warranted. Methane, although present in certain areas of the Site, is not building under pressure beneath the pavement. Passive mitigation of the methane may be considered in conjunction with the Site's planned reuse plans (intermodal transportation/logistics).

**JULY 1, 2025 thru DECEMBER 31, 2025****Activities Completed**

RACER sent the updated Comprehensive Investigation Report to MDNR on October 10, 2025. MDNR provided a response on November 21, 2025, but the comments were focused on the original Comprehensive Investigation Report, which was issued to the regulators on March 9, 2022. Many of the comments MDNR provided on the original Comprehensive Investigation Report were addressed in the updated Comprehensive Investigation Report. RACER provided responses to MDNR's comments on the original Comprehensive Investigation Report on December 23, 2025.

MDNR requested a meeting/conference call for early January 2026 to discuss the responses submitted on December 23, 2025.

**Status**

Additional comments from the MDNR are anticipated on the updated Comprehensive Investigation Report after its review of the report and RACER's response to comments from December 2025. However, the data suggests that groundwater concentrations are undergoing significant concentration reductions, most likely the result of natural attenuation processes and thus remediation of groundwater may not be warranted. Methane, although present in certain areas of the site, is not building under pressure beneath the pavement. Passive mitigation of the methane may be considered in conjunction with the planned reuse plans (intermodal) anticipated for the Site.

**NEW JERSEY**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Routine OMM of Free Product Recovery System (FPR) system is ongoing. In June 2025, the Influent/Effluent Monitoring Report for product recovery system was submitted to NJDEP.

**Status**

The work scope is proceeding as anticipated. OMM of the FPR system will continue. The final Groundwater Remedial Action Permit Application was submitted to NJDEP in August 2025. It is anticipated that the Department will issue the Groundwater Response Activity Plan (RAP) during the third quarter of 2025. Once the Groundwater RAP is issued, the Licensed Site Remediation Professional (LSRP) can issue the Response Action Outcome (RAO), or No Further Action (NFA), for the Site.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Routine OMM of the FPR system is ongoing. The Influent/Effluent Monitoring Report for the product recovery system was submitted to NJDEP in December 2025.

In July 2025, RACER recorded in the chain of title for the real property that comprises the Site an Environmental Protection Easement and Declaration of Restrictive Covenants as well as a new Deed (from RACER Properties to RACER Properties). The primary purposes of these two recorded documents are to: support the 2011 Deed Notice for the Site; limit the Site's use by subsequent owners to a nine-hole golf course with a specified minimum total yardage with related "golf-tainment" facilities; and protect the Site's existing environmental controls.

**Status**

The work scope is proceeding as anticipated. OMM of the FPR system will continue. It is anticipated that the NJDEP will issue the Groundwater Remedial Action Permit during the first half of 2026.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Soil: No soil activities were required of or completed by RACER in 2025.

Groundwater: Groundwater Remedial Action Report (RAR) has been revised to document the off-Site source for PFAS and various VOCs including TCE and its daughter products, along with the groundwater standards compliance attainment for Site-related CoCs, including the newly updated Groundwater Quality Standards (February 2025). The off-Site source was originally identified in the second half of 2023 and the PFAS findings plus additional data review of the NAWC and its operations provided multiple lines of evidence for the argument of an off-Site source migrating onto the Site. The RAR has been finalized and is currently planned for submission to NJDEP in Q3 2025. Groundwater monitoring is continuing as routine OMM, with an annual sampling event scheduled for Q1 2026.

MW inventory and inspection responsibilities on a monthly basis have been transferred to GTA (environmental consultant for developer/owner PTCUR). Monthly summary reports and photos have been received from GTA on a regular basis. Following receiving the reports, a meeting between RACER, RACER's consultant, PTCUR, and GTA is held to discuss any findings. Copies of the reports and accompanying photos are being archived for later use. Plans for additional construction are being discussed with GTA and PTCUR and well locations will be adjusted as needed by the developer's driller and consultant.

**Status**

Soil remedial work is complete at the Site, and the groundwater remedial efforts continue. The property development continues, and apartments are leased and occupied.

**JULY 01, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Soil: No soil activities were required or completed in 2025 by RACER.

Groundwater: The Groundwater RAR has been revised to document the off-Site source for PFAS and various VOCs including TCE and its daughter products, along with the groundwater standards compliance attainment for Site-related CoCs, including the newly updated Groundwater Quality Standards (February 2025). The off-Site source was originally identified in the second half of 2023 and the PFAS findings plus additional data review of the NAWC and its operations provided multiple lines of evidence for the argument of an off-Site source migrating onto the Site. The RAR was submitted to the NJDEP on July 11, 2025. Groundwater monitoring is continuing as routine OMM, with an annual sampling event scheduled for Q1 2026.

Monitoring well inventory and inspection responsibilities on a monthly basis have been transferred to GTA. Monthly summary reports and photos have been received on a regular basis. Following receiving the reports, a meeting is held to discuss any findings. Copies of the report and photos are being archived for later use. Plans for additional construction are being discussed with GTA and PTCUR and well locations will be adjusted as needed by the developer's driller and consultant.

**Status**

Soil remedial work is complete at the Site and the groundwater remedial efforts continue until the groundwater permit is obtained and the RAO is completed. The property development continues, and apartments are leased and occupied.

## **NEW YORK**

**RACER has completed its Environmental Action work at the following Site, where no further action is planned or anticipated. Therefore, this and future editions of the Environmental Action Status Reports does and will not include a separate section for this Site.**

NY – State – Site 10980 – Tonawanda Landfill

**JANUARY 1, 2025 thru JUNE 30, 2025****Activities Completed****Mohawk Uplands Area:**

A pre-mobilization/coordination meeting was held on-Site with representatives from USEPA, USACE, SRMT, and Ramboll on June 3, 2025.

**OMM Activities:**

- Ongoing operation of GW recovery and treatment systems; average recovery and treatment of 13,500 gpd.
- Completed GW monitoring event in April 2025 (MW-302S and MW-302D).
- Mowed Industrial Landfill (ILF) vegetative cover.
  
- Key RACER submissions this period included:
  - Monthly Progress Reports.
  - Monthly SPDES Equivalent DMRs.
  - Response to USEPA comments and observations from the Annual Site Inspection
  - Response to NYSDEC addressing its "SPDES Equivalent Issues and Discussion" letter.
  - Response to USEPA comments on the 2023 Sediment Sampling Report
  - 2024 St. Lawrence River Fish Sampling Report.
  - Documentation of Planned Activities at Outfall 003

**Status**

NYSDEC issued a renewed SPDES Permit Equivalent on March 20, 2025, with a modification (based on RACER comments) issued on May 14, 2025. Activities to address Annual Site Inspection and Outfall 003 observations are planned for second half of 2025.

**JULY 1, 2025 thru DECEMBER 31, 2025****Activities Completed**

**Mohawk Uplands Area:** No environmental-related activities have taken place.

**OMM Activities:**

- Ongoing operation of the groundwater recovery and treatment systems; average recovery and treatment of 11,700gpd.
- Completed annual sitewide groundwater monitoring event in September 2025, following the locations and analytes specified in the agency-directed revised sampling program.
- Completed activities to address Annual Site Inspection and Outfall 003 observations, including discharge piping upgrades in August 2025.
- Decommissioned two unidentified wells.
- Mowed ILF vegetative cover.
- USEPA conducted site inspection.

Key RACER submissions this period included:

- Monthly Progress Reports.
- Monthly SPDES Equivalent DMRs.
- Results from the September 2025 sitewide groundwater sampling event.
- Response to USEPA comments on Planned Activities at Outfall 003.
- Waste characterization data and off-Site Rule Request Form.
- EQuIS submittal of historical fish tissue sampling data.
- St. Lawrence River Sediment Cap Inspection Report.
- Site Activities Summary documenting the Outfall 003 repair/modification work, addressing site inspection items, and well decommissioning.
-

**Status**

Site visit to document restoration of Outfall 003 area (and re-seed if necessary) is planned for first half of 2026.

**JANUARY 1, 2025 thru JUNE 30, 2025****Activities Completed****Storm Water and Groundwater Treatment and Discharge:**

- Performance of routine OMM of stormwater treatment system.
- Sampling and reporting for permitted outfalls 003 and 005.
- Routine OMM of thinner area groundwater collection system.
- NYSDEC conducted annual SPDES inspection on March 11, 2025.
- Annual Consent Order-required groundwater sampling was completed in May 2025.

**Vapor Intrusion Mitigation Program:** Routine OMM.**On-Site and Off-Site RI/FS and Risk Assessment Program:**

- NYSDEC and RACER signed a new Consent Order, effective March 31, 2025, to facilitate NYSDEC taking on the PDI, RD, and RA activities for OU1.
- RACER supported USEPA with OU2 access agreements, enabling USEPA to issue requests for property access for RA implementation.
- Implementation of RA activities for OU2 transitioned from RACER to USEPA in February.
- As the OU2 project has transitioned to USEPA for completion of the RA activities, previously routine conference calls with representatives of USEPA and NYSDEC to discuss OU1 and OU2 activities are now scheduled on an as-needed basis. Between January and July, these calls were conducted about once a month.
- RACER held a conference call on June 4, 2025, with NYSDEC and USEPA representatives to discuss stormwater flooding at the facility and potential alternatives to mitigate impacts to the Site, in particular as it relates to stormwater originating from upstream off-Site sources. Conversations with stakeholders are ongoing and a mitigation solution has not yet been selected.

**Hydraulic Control Pre-design and Design:** No activities took place during this reporting period. NYSDEC is currently reviewing the PDI pumping test technical memorandum submitted in June 2013. Activities are anticipated to be resumed by NYSDEC as they take over Pre-Design Investigation (PDI), Remedial Design (RD), and Remedial Alternatives (RA) activities for OU1.

**Redevelopment:**

- Continued coordination with new property owner and Agencies for Tenant Use Notices and redevelopment activities.
- Several meetings were held with the new property owner to discuss facility flooding resulting from heavy rain during Spring 2025.

**Status**

The selected OU1 remedy is presented in September 2023 ROD. The selected OU2 remedy is presented in the March 2015 Record of Decision (ROD), the October 2015 Order on Consent and Administrative Settlement, and the 2022 and 2023 Explanation of Significant Differences (ESDs). RACER and NYSDEC signed the Order on Consent pertaining to RACER funding OU1 PDI and RD activities. Implementation of OU2 RA activities was transitioned to USEPA.

**JULY 1, 2025 thru DECEMBER 31, 2025****Activities Completed****Storm Water and Groundwater Treatment and Discharge:**

- Performance of routine operation and maintenance of stormwater treatment system.
- Evaluated impacts and solutions to address treatment system fouling by growth of biological mas within treatment system components. A filtration test is planned for 2026 to address this issue.
- Performed non-routing media change-outs and equipment repairs to address pumping rate challenges in the stormwater treatment system.
- Sampling and reporting for permitted outfalls 003 and 005.

**Site 10100 – Former IFG Facility Cont'd**

- Routine operation and maintenance of thinner area groundwater collection system.

Vapor Intrusion Mitigation Program:

- Routine OMM
- RACER conducted the annual sub-slab depressurization system (SSDS) inspection in December 2025.

On-Site and Off-Site RI/FS and Risk Assessment Program:

- Implementation of RA activities for OU2 continues to be performed by USEPA.
- As the OU2 project has transitioned to USEPA for completion of the RA activities, previously routine conference calls with representatives of USEPA and NYSDEC to discuss OU1 and OU2 activities are now scheduled on an as-needed basis. Between July and December, these calls were conducted twice.
- During routine conference calls RACER continued discussions with NYSDEC and USEPA representatives regarding stormwater flooding at the facility and potential alternatives to mitigate impacts on the Site, in particular as it relates to stormwater originating from upstream off-Site sources. Conversations with stakeholders are ongoing and a mitigation solution has not yet been selected.

Hydraulic Control Pre-Design and Design:

- No activities took place during this reporting period. NYSDEC is currently reviewing the PDI pumping test technical memorandum submitted in June 2013. Activities are anticipated to be resumed by NYSDEC as they take over PDI, RD and RA activities for OU1.

Redevelopment:

- Continued coordination with new property owner and Agencies for Tenant Use Notices and redevelopment activities.
- Several meetings were held with the new property owner to discuss facility flooding resulting from continued heavy rain events in Summer and Fall 2025.

**Status**

The selected OU1 remedy is presented in the September 2023 ROD. The selected OU2 remedy is presented in the March 2015 ROD, the October 2015 Order on Consent and Administrative Settlement, and the 2022 and 2023 ESDs. RACER and NYSDEC signed the Order on Consent pertaining to RACER funding OU1 PDI and RD activities. Implementation of OU2 RA activities continues to be completed by USEPA. Storm events result in periodic flooding at the facility. This is exacerbated by stormwater originating from upstream off-Site sources and the elevation of an overflow structure in the stormwater retention basin located at the facility. Conversations with stakeholders are ongoing and a mitigation solution has not yet been selected.

**NY – State – Site 11100 - Ley Creek PCB Dredgings**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

OMM Activities for Cap: Performed routine OMM for soil cover (mowing, maintenance, and inspection).

**Status**

Inspection of the cap identified a sink hole over the pipe leading from CB-03 to Ley Creek. A CCTV investigation was performed for the pipes leading from CB-01 through CB-05 to Ley Creek. An evaluation for the repair or replacement options for these pipes is ongoing. Associated repairs may result in an increase over the original cleanup cost for this Site.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

OMM Activities for Cap: Performed routine OMM for soil cover (mowing, maintenance, and inspection).

**Status**

Inspection of the cap identified a sink hole over the pipe leading from CB-03 to Ley Creek. A CCTV investigation was performed for the pipes conveying stormwater from Factory Avenue drainage ditches through CB-01, CB-02, CB-03, CB-04 and CB-05 to Ley Creek and found the pipes to be in various states of disrepair. An evaluation of repair or replacement options for these pipes is ongoing. During routine agency conference calls for the Former IFG Facility (Site 10100), RACER continued discussions with NYSDEC and USEPA representatives regarding repairs to the pipes. Conversations with stakeholders are planned and a mitigation solution has not yet been selected. Associated repairs may result in an increase over the original cleanup cost for this Site.

Updated through December 31, 2025

## **OHIO**

**RACER has completed Environmental Action work at the following Site, where no further action planned or anticipated. Therefore, this and future editions of the Environmental Action Status Reports does and will not include a separate section for this Site.**

OH – State – Site 12010 – Mansfield Stamping Plant

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Performed OMM of Cap and Leachate Collection System, and semi-monthly OMM of the Former Disposal Area (FDA), Former Storm Water Pond (FSP), and leachate collection system. Revised and submitted Corrective Measures Proposal (CMP) based on USEPA comments. Completed and submitted the Annual Report for 2024 activities.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Performed OMM of Cap and Leachate Collection System, semi-monthly OMM of the FDA, FSP, and leachate collection system.

**Status**

No change in status.

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Performed OMM of the two closed RCRA units, monthly DN-13 effluent sampling in accordance with NPDES permit, and collection of Site-wide groundwater monitoring program. Continued to monitor the shutdown In-Situ Reactive Zones (IRZ) zones through groundwater conditions via additional groundwater sampling. Continued operation of Phase I Dynamic Groundwater Recirculation (DGR) for the Riverview Neighborhood. Activities were also completed in the downgradient neighborhood related to the vapor intrusion mitigation program. Submitted 2024 Site-Wide Annual Groundwater Monitoring Report. Completed the drilling program for implementing the Corrective Measures Implementation Plan for treatment in the main source area and prepared for the initial injection event. Submitted draft Post Closure Addendum for Closed South Lagoon to account for new cover as part of redevelopment.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Field activities included OMM of the two closed RCRA units, and collection of groundwater samples for Site-wide groundwater monitoring program. Conducted preparation work for DN-13 rehabilitation. Continued with shutdown of the IRZ carbon source introductions zones. Implemented maintenance and monitoring activities associated with the operation of the USEPA-approved Interim Measure Phase I DGR for remediation of the Riverview Neighborhood. Activities were also completed in the downgradient neighborhood related to the vapor intrusion mitigation program, including conducting system inspections. Began source treatment in the PSA Building as part of the Corrective Measures Implementation Plan. Continued to work with USEPA on drafting the Environmental Covenants to be filed on each parcel at the Site.

**Status**

No change in status.

**OH – State – Site 11110 - Elyria Closed Landfill**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Performed Landfill Post Closure Operations including groundwater monitoring, and routine inspections of landfill in accordance with Post-Closure Plan. Submitted 2024 Biennial Groundwater Monitoring Report. Submitted addendum to Post Closure Plan to Ohio EPA. Submitted Corrective Measures Implementation (CMI) to Ohio EPA for cover as final remedy.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Received Ohio EPA approval of addendum to Post Closure Plan for the landfill. Completed site-wide monitoring well inventory and conducted required water level gauging event. Performed Landfill Post Closure Operations including monitoring and inspections of the landfill in accordance with revised Post Closure Plan. Conducted inspection and filed report for Use Restrictions Notification.

**Status**

No change in status.

**OH – State – Site 12030 - Parma Powertrain Assembly Plant**

**JANUARY 1, 2025 thru JUNE 30, 2025**

**Activities Completed**

Performed field activities associated with OMM of the Sub-Slab Depressurization System (SSDS). Conducted Site visit to ensure SSDS was operating properly.

**Status**

No change in status.

**JULY 1, 2025 thru DECEMBER 31, 2025**

**Activities Completed**

Completed annual certification reporting which included the Risk Management Plan and OMM reports. Performed field activities associated with OMM of the SSDS. Conducted Site visit to ensure SSDS was operating properly.

**Status**

No change in status.