



# Environmental Status Report

Updated Thru June 30, 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  
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**

OOC: Order of Conditions  
O&M: Operation and Maintenance

### **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 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

SWPPP: Storm Water Pollution Prevention Plan

**T**

TAPS: EGLE Technical Assistance and Program Support  
Teams

TCE: Trichloroethylene

TSCA: Toxic Substances Control Act

**V**

VI: Vapor Intrusion

VOC: Volatile Organic Compound

**DELAWARE**

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Completed LTOMM activities outlined in the LTS Plan. These activities included groundwater sampling and inspection of OU-5 Cap. Obtained access to continue with downgradient monitoring activities associated with LTOMM activities.

**Status**

No change in status.

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

**Activities Completed**

Submitted Year Three Groundwater Monitoring Report to DNREC as required by the LTS Plan. Also submitted the revised LTS monitoring plan and the decommissioning plan for the 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.

**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**

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Parcel 2 – RACER awaits USEPA review of the updated Evaluation and Assessment of Environmental Impacts - Parcel 2 report (submitted December 19, 2022). The report concluded no significant human health or ecological risks associated with the parcel and requests a no further action letter from USEPA.

Parcel 39 (Restoration) – RACER, IDEM, and EPA worked together to finalize an Environmental Restrictive Covenant to mitigate potential future damage of the wetlands. RACER submitted the ERCs, and a letter from IDEM requesting ERCs be recorded, to owners of the four properties that were subject to the restoration activities.

RACER worked on preparing the semi-annual progress report which detailed activities completed in the second half of 2024.

**Status**

RACER will continue to work with IDEM to evaluate the potential for closure of Parcel 39 and with EPA concerning the closure of Parcel 2. EPA agrees that no further action is required for Parcel 2; therefore, RACER will prepare and record an ERC Amendment that identifies monitoring wells that have had historical detections of PCBs.

**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 ERC Modification that identifies monitoring wells that have had historical detections of PCBs, EPA would issue a no further action for Parcel 2. RACER prepared an ERC Modification for review by the property owner, EPA, IDEM, and General Motors 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 actions taken to date in attempt of recording 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, 2024 thru DECEMBER 31, 2024****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 first half 2024 and worked on preparing the second half 2024 report. RACER began preparing a Long-Term Stewardship Plan for managing the institutional controls and groundwater monitoring. RACER submitted the draft Corrective Measures Construction Completion Report detailing the CMI activities to EPA and is working on finalizing this Report. On November 8, 2024, RACER completed site walk-through with USEPA.

RACER submitted a draft ERC for the southern portion of the property for USEPA review. After USEPA approval, submitted the ERC to IDEM for review. IDEM requested clarification and modifications to the ERC and RACER worked to update the draft ERC.

RACER submitted to the Kokomo Plan Commission a Rezoning Petition for a Well Restriction Overlay District (WR-OL District). The petition included the finalized Water Use Evaluation. RACER attended City of Kokomo Plan Commission Meeting on November 12, 2024, to present the proposed WR-OL District zoning change. The proposal was passed unanimously and on November 25, 2024, the Kokomo Plan Commission presented the proposal to the City of Kokomo Common Council. The Kokomo Common Council unanimously passed the proposed zoning change. Zoning ordinance No. 6279 was amended by incorporating the Well Restriction-Overlay District on November 26, 2024.

**Status**

RACER will finalize the Construction Completion Report, finalize the Long-Term Stewardship Plan, and record an ERC for the southern portion of the property. RACER will complete semi-annual groundwater monitoring during the first half of 2025.

**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 2025 report. On April 11, 2025, RACER recorded an 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 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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Worked with 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. RACER completed a site walk with representatives from IDEM and IEDC contractors.

Vapor intrusion and mitigation activities south of the Site continued. RACER continued to monitor property transfers in the focus area and contact the new owners of transferred properties to explain the investigation activities and attempt to gain access to sample previously inaccessible residences. Several mitigation systems were inspected, and the system monitoring unit was upgraded at one property.

**Status**

Continue to work with IDEM to evaluate groundwater data as it relates to vapor intrusion and develop plans for mitigation or retesting of off-Site homes, as needed, throughout the sampling area. Complete annual O&M inspections in 2025. A soil NFA was issued by IDEM in 2014. RACER awaits IDEM issuance of a No Further Action determination letter that covers all the on-site SWMUs and AOCs (aka AOIs) for which all the work has been done.

RACER will prepare an annual Groundwater and Vapor Intrusion Summary Report for IDEM. RACER will update the groundwater monitoring plan as needed, based on analytical data trends and overall plume migration. RACER will work with the IEDC as it continues to redevelop the Site.

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

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

**Activities Completed**

Worked with 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. 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 O&M inspections, as needed, in 2025. A soil 'No Further Action' 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 a 'No Further Action' 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 the Fall of 2025, with IDEM's concurrence. RACER will work with the IEDC as it continues to redevelop the Site.

**JULY 1, 2024 through DECEMBER 31, 2024**

**Activities Completed**

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

Submitted the supplemental RFI work plan designed to address IDEM comments on the RFI Report. Received and discussed comments from IDEM and initiated revisions to the RFI work plan to address them. The work plan is currently under review.

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 but at a very slow pace. IDEM has in effect held up the on-Site work because of an off-Site issue – lead in the soil of nearby residential properties -- not contemplated in the cost estimates and remedial tasks developed during the negotiations to settle the State of Indiana's and the U.S.'s bankruptcy proofs of claim for the Muncie Site. Nonetheless, RACER will prepare a draft CMP concurrent to the draft RFI Report update following implementation of the RFI supplemental work plan (once approved). An ERC will be recorded once the RFI Report and CMP are approved by IDEM.

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

**Activities Completed**

Updated the Site-wide risk assessment prepared as a part of the 2014 RCRA 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 CMP will be prepared concurrently to the draft RFI Report update following implementation of the approved RFI work plan. An ERC will be recorded once the RFI Report and CMP are approved by IDEM.

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

On August 19, 2024, IDEM provided comments on the 2023 Groundwater Monitoring Report. On October 7, 2024, on behalf of RACER Trust, GHD provided responses to IDEM's comments, which were acknowledged and accepted by IDEM on November 15, 2024.

**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.

**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.

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**JULY 1, 2024 thru DECEMBER 31, 2024**

**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. RACER continued the groundhog trapping program in 2024. RACER started pumping from the extraction wells but was notified of additional sampling requirements from the municipal water company; therefore, pumping will be halted until IDEM approval is received. Executed a Purchase Option Agreement with Rolls-Royce Corporation which expires October 1, 2027. RACER recorded an Environmental Restrictive Covenant for the property restricting land use, groundwater use, and other development that may interfere with the Post-Closure Permit.

**Status**

RACER will continue to complete activities in accordance with the Post Closure Permit issued by IDEM. RACER will collect samples from the extraction wells for analysis and will submit results to the municipal water company. RACER will resume pumping from within the slurry wall after approval from the municipal water company. Groundwater sampling will be completed in the Spring of 2024.

**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 the annual groundwater samples in May and will report findings in accordance with the 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 Post Closure Permit issued by IDEM. 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.

**KANSAS**

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Performed the 2024 annual long-term monitoring event from July 15-18, 2024.

Prepared and submitted the 2024 annual long-term groundwater monitoring report, which included a 5-year review, to KDHE on October 18, 2024.

Completed the annual inspection to support the EUC on December 2, 2024.

**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 Plan and a planned reduction in sampling frequency for a subset of monitoring wells recommended in the 2024 annual report.

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

**Activities Completed**

Prepared and submitted to KDHE the 2024 annual inspection report to support the 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.

## **MASSACHUSETTS**

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

In accordance with OMM Plan, a semi-annual inspection, maintenance, and monitoring event was conducted (Year 18 Round 2) in November 2024. The event consisted of performing an inspection of the landfill; documenting and performing maintenance of the landfill cap and storm water control features; and collecting groundwater, sediment, and surface water samples. Additional groundwater samples were collected and analyzed for PFAS. Completed heavy landscape maintenance event which included removal of Japanese knot weed and overgrown vegetation, including in the wetlands area. Prepared for submitting the Year 18 OMM Report for 2024.

**Status**

No change in status.

**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.

## 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

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

IU G - Former Nodular Iron Plant OMM: Prepared an updated PFAS Sampling Plan approved by USEPA on December 6, 2024. The 2024 annual mixing zone based GSI compliance monitoring and PFAS monitoring events were completed concurrently in December 2024.

IU H - WWTF Closure: None.

IU I – Classified Sands: None.

RCRA Reporting and Other Reporting

- Submitted semi-annual progress report to USEPA in October 2024.
- Prepared for and participated in conference calls with USEPA's new Project Manager, William Grossett, on July 8, August 29, and November 13, 2024, to discuss current status and next steps.
- Received CMP comments from USEPA on July 31, 2024. Revisions to the CMP are in progress.
- Began preparation of the draft DRC for submittal to USEPA for review.

**Status**

Future activities are dependent on EGLE's position on the need for continued groundwater sampling and review of the potential for impact to the nearby on-site wetland through the GSI pathway, and on any additional USEPA comments on the revised CMP being prepared.

**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 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 DRC (1 of 5) to USEPA in June 2025.

**Status**

No change in status.

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Agreements/Work Plans/Reports

Submitted Semi-Annual Progress Report (April 1 through September 30, 2024) to USEPA on October 23, 2024.

Began preparing report to document results of the Fall 2024 groundwater monitoring.

Submitted Updated Well Record Report to USEPA on October 28, 2024.

Submitted Spring 2024 groundwater sampling report November 13, 2024.

Placed discussions regarding the proposed Groundwater Use Restriction Ordinance on hold pending assessing impact of detection of PFAS in groundwater.

Site Investigation:

- Groundwater samples collected and samples analyzed for PFAS by USEPA. Results received from USEPA on July 22, 2024.
- Participated in Teams meeting with USEPA on August 2, 2024, to discuss PFAS sampling results.
- Met with the USEPA Project Manager at the Site on September 17, 2024, to familiarize the PM with Site conditions and surroundings.
- Completed Fall 2024 semi-annual groundwater sampling event in late October 2024.

**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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Corrective Measures – General & Institutional Controls

- Conducted routine project update calls with USEPA in July, September, October, and December 2024.
- Submitted Supplemental RCRA Facility Investigation Summary and Recommendations Memo in March 2024 on which USEPA provided its comments in June 2024. A response to USEPA's comments was provided in September 2024 and the Final Supplemental RCRA Facility Investigation Summary and Recommendations Memo was submitted to USEPA in October 2024.
- Submitted 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 July 2024. Participated in a meeting with USEPA and EGLE Remedial Advisory Team regarding Fiero Parking Lots in November 2024.
- Completed 2024 Annual Property Inspection in October 2024, which included inspections of monitoring wells, PCB caps, and to the extent possible, DRC provisions.

Corrective Measures – Groundwater/LNAPL: Submitted Draft 2024 LNAPL Assessment Update – MWM32-04 and TW-MD-06, in November 2024, summarizing additional LNAPL gauging and select groundwater sampling related to these two wells; in response, USEPA provided comments in December 2024.

Corrective Measures – Groundwater Monitoring:

- Conducted semi-annual groundwater and soil vapor monitoring at the Former Fiero properties in September 2024. Completed sampling of MWOS-10 in November 2024 to complete a year of quarterly monitoring of this well as requested by USEPA.
- Installed two additional soil vapor monitoring points (SVMPs) in the right of way south of MWOS-10 in July 2024, per USEPA request. The new SVMPs were sampled in Third and Fourth Quarters 2024.
- Submitted Draft Updated Groundwater Monitoring Plan (GMP) in August 2024. USEPA provided comments to this Draft and a Revised Draft was submitted to USEPA in October 2024. USEPA provided additional comments to the Revised GMP; updates to it are currently pending receipt, evaluation, and discussion with USEPA of additional monitoring data.
- Submitted Monitoring Well Abandonment Proposal to USEPA in August 2024. USEPA indicated via email that it will review once Updated Revised GMP is re-submitted for final approval.
- Completed the 2024 Annual Groundwater Sampling Event in November 2024 utilizing the Draft Updated GMP that was approved with conditions in October 2024.
- Submitted SVMP Installation and Sampling Memo to USEPA in December 2024.
- Submitted the 2023 Annual Groundwater Monitoring Report in May 2024 on which USEPA provided comments in July 2024. Responses to USEPA comments were provided via email in September 2024. The Final Report was submitted to USEPA in November 2024.

Corrective Measures – Soil: Additional soil sampling as outlined in the Supplemental RCRA Facility Investigation Summary and Recommendations Memo approved by USEPA was completed in October and November 2024.

Groundwater Sampling for PFAS:

- Annual PFAS Sampling as outlined in the Draft Updated GMP was completed in November 2024. USEPA approved with conditions the Updated GMP in October 2024.
- Submitted the PFAS Storm Sewer Sampling Work Plan to USEPA in December 2024.

Storm Sewers/Montcalm Seep

- Conducted routine O&M associated with the Montcalm Street Seep Control System; measures to prevent seepage of groundwater from the Site onto Montcalm Street continue to be successful.
- Continued evaluation of options to complete modifications to the Montcalm Street Seep Control System to optimize the system's operations.
- Conducted meeting with USEPA to discuss the Montcalm Seep Evaluation in July 2024. Had subsequent meeting to discuss USEPA comments/questions in August 2024.

**Site 11970/11210 - Pontiac N. Campus/Fiero Site Cont'd**

Joslyn Avenue Investigations:

- Submitted Final 2023 Groundwater Sampling Summary for the Joslyn South Parcel property to EGLE and USEPA in August 2024.
- Completed groundwater sampling of three select monitoring wells in September 2024.
- Submitted 2024 Groundwater Sampling Summary for the Joslyn South Parcel property to EGLE and USEPA in December 2024.

**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 provided comments in May 2025 via email transmittal. A response to comments was submitted to USEPA in June 2025. The Final PFAS Storm Sewer Sampling Results Memo was submitted to USEPA in June 2025.

Storm Sewers/Montcalm Seep:

- Conducted routine O&M 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.

Updated through June 30, 2025

**Site 11970/11210 - Pontiac N. Campus/Fiero Site Cont'd**

- Submitted Montcalm Street Seep Control Discharge Hose Reconfiguration request to USEPA via email transmittal in May 2025; USEPA approved the request via email in May 2025.
- Completed hose reconfiguration activities in late May and June 2025 and subsequently completed follow-up observations. An update on these activities was provided to USEPA via email in June 2025.

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

**Status**

No change in status.

**JULY 1, 2024 thru DECEMBER 31, 2024****Activities Completed**

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

Maintain Booms on Outfalls: Completed inspections and boom maintenance (as necessary) of Outfalls 002, 003, 004, and 005.

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

- Prepared and submitted Phase I Northend Well Abandonment Summary Memo to EGLE on July 16, 2024.
- Prepared and submitted Semi-Annual Report No. 5 to EGLE on July 16, 2024.
- Prepared and submitted Hamilton Avenue Overflow Timeline and Summary of Actions to EGLE on August 6, 2024.
- Prepared and submitted Fall 2024 Groundwater Sampling Event Work Plan to EGLE on October 9, 2024.
- Prepared and submitted Workplan for Sampling of Outfall 011 Storm Sewer and Sanitary Sewer on Hamilton Avenue to City of Flint on December 2, 2024, and submitted to EGLE on December 17, 2024.
- Held conference call with EGLE on July 10, 2024, to discuss sitewide conceptual remedial cost estimates.
- Held conference call with EGLE on July 24, 2024, to discuss downgradient groundwater control option.
- Held conference call with EGLE on August 7, 2024, to discuss Outfall Priority Memo and vapor intrusion evaluation.
- Attended on-Site meeting with EGLE, City of Flint, and Ashley Capital on August 22, 2024, to discuss Outfall 011 reroute, progress update, and tour of redevelopment activities.
- Held conference call with EGLE on October 22, 2024, to discuss vapor intrusion evaluation and priority planning updates.
- Held conference call with EGLE on October 31, 2024, to discuss the approach to investigating the PFAS hot spot areas.
- Attended on-Site meeting with EGLE, City of Flint, and Ashley Capital on November 21, 2024, to discuss redevelopment progress.
- Held public information meeting on November 21, 2024, to discuss Site redevelopment, PFAS prioritization/remedy evaluation, and upcoming priorities.
- Attended on-Site meeting with City of Flint on November 13, 2024, to discuss City of Flint sanitary sewers and City's notice of violation to RACER.
- Held bi-weekly conference calls with EGLE on September 4, September 18, October 2, October 16, October 30, November 13, November 27, December 11, 2024, to discuss current Site priorities, Outfall 011 design and bid package, VI issues, and remedial progress updates.

**Compliance**

- Conducted SWPPP semi-annual inspection in September 2024.
- Conducted annual wet weather sampling event in December 2024.

**Remedy Design, Implementation, and OMM**

- Completed first round of sampling for short-term construction monitoring in August 2024.
- Completed berm installation for Hamilton Avenue surface runoff interim measure in September 2024.
- Collected groundwater samples from Factory 36 Area and Southend-Lear property to monitor groundwater conditions in October 2024.
- Completed second round of sampling for short-term construction monitoring in December 2024.
- Collected sanitary sewer samples from Hamilton Avenue to evaluate remedy options in December 2024.
- Collected Outfall 011 storm sewer information to facilitate treatment system design in December 2024

**PFAS Investigation**

- Completed groundwater gauging and well sampling in former Lagoon area to monitor PFAS concentrations in July 2024.
- Completed storm sewer sampling at various outfalls to monitor PFAS impacts and for remedy evaluations in August and December 2024.
- Completed groundwater gauging and well sampling in Building 04/Hamilton Avenue area to monitor PFAS concentrations in August 2024.
- Completed groundwater gauging and well sampling in former Lagoon area to evaluate interim measures in December 2024.

**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, 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 monitoring wells 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 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 NPDES 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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Groundwater Monitoring: Completed semi-annual groundwater monitoring event in September 2024.

Agency Coordination/Negotiation, Reporting & Project Management

- Prepared First Half 2024 Progress Report and submitted to USEPA on July 12, 2024.
- Received from USEPA in July 2024 a Draft Technical Review of the Site, which summarized USEPA's review of information and proposed recommendations for future corrective action.
- Participated in Teams meeting with USEPA on July 24, 2024, to review Site background, the USEPA Draft Technical Review summary, and path forward.
- Participated in Teams meeting with USEPA on August 28, 2024, to review budget priorities and Site goals.
- Met with USEPA PM at Site on September 17, 2024, to familiarize the PM with Site conditions and surroundings.
- Began preparation of an Exposure Pathway Evaluation.
- Prepared Data Report summarizing the September 2024 groundwater monitoring event and submitted to USEPA on December 18, 2024.

**Status**

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 comments on the Evaluation from USEPA 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, 2024 thru DECEMBER 31, 2024****Activities Completed**

Corrective Action OMM: 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 as part of the continued shutdown evaluation.

Off-Site (AOI31) Vapor Intrusion Evaluation: Submitted response to comments and revised draft Vapor Intrusion Pathway Monitoring Work Plan: Proposed Groundwater and Soil Vapor Sampling Strategy for the Off-Site Residential AOI 31 to USEPA (Phase 2 and Phase 3) and associated QAPP. Submitted results data packages for several rounds of Phase 2 and Phase 3 field investigation of soil gas and groundwater. Discussed results with USEPA, EGLE, and City of Livonia. Completed delineation activities south of Grantland Street properties and into Newburgh Village Senior Living Facilities (Phase 3 Groundwater and Soil Gas Investigation). Additional sampling completed of sanitary sewer along Grantland Street. Also, two seasonal sampling events of the current monitoring network for groundwater and soil gas. Submitted work plan to install a passive barrier wall at the leading edge of the groundwater plume at the northern border 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 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**

Status unchanged.

**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. Approximately 57,688 gallons of groundwater 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

Updated through June 30, 2025

**Site 13020 – Eckles Road Cont'd**

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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Groundwater Monitoring: USEPA’s consultant completed sampling at the Site on July 9, 2024, and samples were analyzed for PFAS.

Reporting: USEPA provided preliminary results on July 31, 2024.

PCB Soils Closure: Revision of the current DRC is pending and will be provided to USEPA and EGLE for review and then recorded to complete activities related to PCB-impacted soils.

Corrective Action Reporting: None

**Status**

Further assessment is needed to evaluate what, if any, additional work is warranted at the Site in relation to PFAS.

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

**Activities Completed**

Groundwater Monitoring: None.

Reporting: None. USEPA shared PFAS results with MPART.

PCB Soils Closure: None.

Corrective Action Reporting: None

**Status**

Status unchanged.

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

LNAPL Recovery System Installation: No activity during this period.

Implement RAP, Site OMM:

- On September 4, 2024, completed mowing paths to and around wells where vegetation was overgrown, in preparation for the annual groundwater monitoring event.
- Performed monitoring well redevelopment on September 5-6, 2024, based on observed elevated results collected in 2023 that may have been related to sediment or turbidity in wells that had limited water columns.
- Performed annual groundwater monitoring event from September 9-12, 2024, 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**

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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Revision to RAP, Consent Judgment, and OMM Plan: Installation of the necessary storm water modifications began during the second half of 2022. GMLLC's portion of the separation work was completed in September 2023. The remaining modifications were completed by RACER in September 2024. A construction completion report will be prepared and submitted to EGLE which documents the work completed during the construction period. Information obtained during evaluation and construction of storm water modifications indicates the recorded DRC needs to be revised to account for slight differences in exposure barrier, slurry wall locations, storm water modifications, and other clarifications. Installation of permanent markers will be scheduled after the revised DRC is recorded.

In accordance with the OMM Plan, an annual monitoring event was conducted in October 2024. A review of the historical groundwater sample results reveals that the 2024 results are consistent with previous years.

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

Site O & M Activities: Completed monthly inspections of the cap and containment system, as well as maintenance and level monitoring of CSC and MSA groundwater extraction systems. Completed clean-out of the diffuser tanks in July and August 2024.

Began repair activities to address EGLE's CAMM Inspection Report in July 2024. To date, the perimeter fence, vegetated cover, and identified monitoring well casings have been repaired. Repairs to the concrete driveway will be scheduled in the Spring of 2025.

**Status**

On-going O&M will continue.

**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 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 O & M 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 April 2024 CAMM Inspection Report.

**Status**

On-going O&M 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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

OMM and Reporting

- The 2024 annual soil cover inspection was completed on December 10, 2024, and the results were summarized and submitted to EGLE on December 31, 2024. 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**

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 of 2025.

**Status**

No change in status.

**JULY 1, 2024 thru DECEMBER 31, 2024**

**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 30, 2024.
- Performed semi-annual groundwater monitoring well and leak detection vault sampling during the week of November 4, 2024.
- Conducted annual inspection and split sampling for the leachate system sanitary sewer discharge with City of Flint Department of Public Works and Utilities Water Pollution Control on August 30, 2024. Sampling was also conducted with City of Flint on December 19, 2024.

Vapor Investigation: Abandoned soil vapor probes on December 10, 2024.

PFAS Investigation: Prepared report documenting results of the annual PFAS groundwater sampling event and submitted to EGLE on September 11, 2024.

PFAS Corrective Measures Evaluation and Implementation

- Continued evaluation of a stationary treatment system concept, including bench-scale laboratory studies.
- Prepared and submitted a Storm Sewer Evaluation Update on August 22, 2024, summarizing results of June 17, 2024 sampling event.
- Prepared and submitted Stanley Road Sanitary Sewer Update on August 30, 2024.
- Prepared and submitted a West of Site Sanitary Sewer Update on August 30, 2024.
- Collected pond samples (SW-13 and SW-15) from the Middle and Western Ponds on September 19, 2024.
- Mobilized temporary PFAS treatment system to the Western Pond and began operation on September 18, 2024, and operated until November 23, 2024, to remove PFOS prior to discharge to the municipal storm sewer system.
- Conducted Third Quarter 2024 storm water inspection on October 14, 2024 and Fourth Quarter 2024 storm water inspection on December 19, 2024.
- Completed sampling of private water supply wells on October 17, 2024.
- Collected storm water samples from off-Site sewer lines on October 14, 2024.
- Prepared and submitted a PFAS Activity Progress Report on December 3, 2024.
- Collected samples from sanitary sewer manholes on December 19, 2024.

**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.

Updated through June 30, 2025

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

- 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 on March 20, 2025, summarizing the results of the December 2024 sampling event.
- Prepared and submitted 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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Additional Site-wide Investigation

- Comments on the May 13, 2024, Draft Risk-Based PCB Cleanup Plan were received from USEPA on August 15, 2024. A conference call was held with USEPA and EGLE on October 9, 2024, to discuss the comments and approach for PCBs in soil on the adjacent railroad property. A Revised Draft Risk-Based PCB Cleanup Plan was submitted to USEPA and EGLE on December 12, 2024.
- In response to EGLE’s August 9, 2024, request for additional details on the proposed risk assessment approach for PAHs in soil on the adjacent railroad property, a draft memorandum summarizing the statistical methodology utilized to calculate the 95% Upper Confidence Level for PAHs was submitted to EGLE on October 2, 2024.

**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 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, 2024 thru DECEMBER 31, 2024****Activities Completed****RI Investigation/Reporting, Work Plans, Soil and Groundwater Investigations**

- Submitted Updated Interim Measures Report to EGLE presenting the results of groundwater sampling and statistical modeling of PCE plume in the PCE Area.
- Submitted to EGLE an updated scope of work for well abandonment activities on MFM property.
- Conducted a Site-wide well inspection event on ACM, MFM, WCAA, and YCUA properties.
- Met on Site with EGLE staff in September to inspect 84" storm sewer outfall and walk the active storm sewer network lines on Site.
- Conducted recovery of DNAPL at single groundwater monitoring well. DNAPL recovered at four separate occasions between June and December 2024. DNAPL thickness and recharge monitored weekly since initial DNAPL recovery.
- Waste from DNAPL recovery removed from Site for disposal in December 2024.
- Conducted visual inspection of active storm sewer network in November 2024. Groundwater infiltration to storm network observed at two manhole locations on MFM property; MFM notified of inspection results.

**Groundwater Collection System:** The system remained off through 2024 and expected to remain off through 2025. Revised RCRA DRC and new TSCA DRC recorded for MFM property.

Work ongoing to update deed restrictions and easements for ACM to provide for the concurrent redevelopment and remediation of the Site.

**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.
- Ongoing work and follow up with EGLE and MFM for ESSD sampling, Outfall/discharge review.
- Drain tiles connected to catch basins along MFM ESSD temporarily sealed 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.
- Waste from DNAPL recovery and groundwater sampling inspected weekly.
- PFAS Summary report submitted to EGLE in June 2025.
- 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 of restarting going forward.

Work ongoing to update deed restrictions and easements for 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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Groundwater Monitoring: Prepared 2024 annual groundwater sampling report and submitted to EGLE on August 28, 2024.

PFAS Investigation: Prepared 2024 annual PFAS sampling report and submitted to EGLE on August 28, 2024.

Closure: Received preliminary comments from EGLE on the 2019 draft No Further Action Report on July 2, 2024. Held virtual meetings with EGLE on August 1, September 19, and December 6, 2024, to discuss comments on 2019 draft No Further Action Report, remaining funding, task prioritization, and potential next steps.

Reviewed and summarized all available past Site data and began preparing a Scope of Work to address an alternate Site closure (i.e., completion) strategy for RACER’s responsibilities on the property.

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

**Status**

A scope of work for an alternate closure strategy is being prepared to address RACER’s responsibilities at the Site. Future activity is dependent upon submittal of the scope of work, EGLE’s review of that scope, and subsequent discussions.

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

**Activities Completed**

Groundwater Monitoring: None. Cessation of groundwater sampling was proposed in 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 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 No Further Action Plan. EGLE provided comments regarding the letter via email on April 14, 2025. A Response to Comments letter was submitted to EGLE on May 31, 2025.

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

**Status**

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

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Post-Closure Care and Maintenance Program: Completed semi-annual inspection for the Windiate Park and Pengelly Road Lot 460 properties on November 21, 2024. No significant issues were identified.

**Status**

No change in status.

**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 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, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Work Plans, Investigation, and Reporting

- Submitted Second Quarter 2024 Progress Report in July 2024.
- Submitted Plant 2 Area 2 Excavation and Plants 2 and 3 Exposure Barrier Placement Completion Report to EGLE in August 2024.
- Submitted Monitoring Well and Sub-Slab Monitoring Point Abandonment Proposal to EGLE in August 2024.
- Submitted LNAPL Well Abandonment Proposal to EGLE in October 2024.
- Completed abandonment of eight LNAPL wells, two groundwater monitoring wells, and four sub-slab monitoring points (with EGLE’s approval) in November and December 2024.
- Completed soil gas and select groundwater sampling associated with Plant 6 during Third and Fourth Quarters of 2024 for assessment of potential off-Site vapor intrusion.
- Held virtual meeting with EGLE to present the quarterly update on remedial progress in October 2024.
- Submitted 2024 Semi-Annual Groundwater Monitoring Report in October 2024.
- Submitted Third Quarter 2024 Progress Report in October 2024.
- Received comments from EGLE in November 2024 on Biosparge Shut Down Evaluation Plan. Comments were based on EGLE’s review of the plan and a virtual meeting with the EGLE MMD Remediation Advisory Team (RAT) to discuss it. RACER provided a response to comments to EGLE in December 2024.
- Submitted 2024 Exposure Barrier Inspection Report to EGLE in December 2024.
- Submitted 2025 Revised IGMP for EGLE review in December 2024.

LNAPL Gauging: Completed semi-annual LNAPL gauging during the Fourth Quarter 2024.

Quarterly Groundwater Monitoring: Completed routine and non-routine groundwater monitoring and gauging during Third and Fourth Quarters of 2024 per the EGLE-approved May 2023 IGMP.

Quarterly Storm Sewer Sampling: Completed routine and non-routine sampling of select storm sewer manholes during Third and Fourth Quarters of 2024 per the EGLE-approved May 2023 IGMP.

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

PFAS Corrective Measures:

- Completed routine groundwater monitoring for PFAS during the Third and Fourth Quarters 2024.
- Installed a new catch basin in a low-lying area in the northwestern portion of Plant 2 in October 2024 to address ponding of storm water runoff caused by previous plugging of manholes in that area.
- Plugged two additional storm sewer manholes in northwestern part of Plant 3 to prevent storm water from surfacing from the manholes and potentially flowing overland off-Site.

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 the biosparge systems as necessary including equipment repairs and well rehabilitation/repair to optimize performance.
- Collected performance groundwater monitoring samples during the quarterly groundwater monitoring events as noted above.

**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.

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

- Held virtual meeting with EGLE and 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 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, 2024 thru DECEMBER 31, 2024****Activities Completed**

Existing Building: Haulaway Building SSDS continues to operate and be protective of human health. On September 5, 2024, GHD directly contracted with EarthLink Environmental and oversaw replacement of an older model fan with a new OBAR fan. The new OBAR fan was pulling 8 inches of vacuum. Subsequently the system was modified to operate solely on one fan while the second fan can be used as a backup as needed. Online access was obtained via coordination with Terradex and OBAR to allow Terradex to upload and display data directly from the OBAR Sensors.

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, which has been finalized and submitted to EGLE. GHD and RACER met with EGLE after submittal of same to review the report. Following confirmation from EGLE, GHD will complete the well abandonment work in 2025.

**Status**

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

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

Existing Building: Haulaway Building SSDS continues to operate and be protective of human health. The last SSDS O&M event took place on July 29, 2024, during which GHD 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 for this Site. GHD did respond to a Miss Dig call to make sure a MW 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. GHD and RACER met with EGLE after submittal of same to review the report. Following confirmation from EGLE, GHD will complete the well abandonment work in 2025 or 2026.

**Status**

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

## **MISSOURI**

**JULY 1, 2024 thru DECEMBER 31, 2024****Activities Completed**

The results of the first quarterly 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 revised Site Investigation Work Plan (conducted in June 2024) were summarized and provided to MDNR on August 8, 2024. The second quarterly groundwater and soil vapor sampling event was conducted between September 15-19, 2024. The results of the September 2024 sampling event were summarized and provided to MDNR on November 11, 2024. On November 27, 2024, MDNR provided comments on September 2024 summary report. Responses to MDNR's comments were provided to the Department on December 13, 2024. MDNR concurred with the comments on December 13, 2024. The third quarterly groundwater and soil vapor sampling event was conducted between December 3-7, 2024. The results of sampling are pending.

**Status**

Methane gas in soil evaluation and revisions to the site Comprehensive Report will continue after the results of the assessment activities associated with the Evaluation (revised Site Investigation Work Plan) are received.

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

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) were summarized and provided to MDNR on February 14, 2025. MDNR comments were received on March 3, 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 were summarized and provided to the MDNR on May 7, 2025, with MDNR comments received June 3, 2025.

**Status**

Groundwater and methane gas in soil evaluation and revisions to the site Comprehensive Report are underway. The data suggest 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).

**NEW JERSEY**

**NJ – State – Site 10080 - Former Hyatt Clark Industries Property**

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Routine OMM of FPR system is ongoing. In August 2024, NJDEP approved Groundwater Remedial Action Report/Corrective Action Report. The Influent/Effluent Monitoring Report for the product recovery system was submitted to NJDEP in December 2022.

**Status**

The work scope is proceeding as anticipated. OMM of the FPR system will continue. It is anticipated that NJDEP will issue Groundwater RAP during second quarter of 2025.

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

**Activities Completed**

Routine OMM of 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 RAP during the third quarter of 2025. Once the Groundwater RAP is issued, the LSRP can issue the RAO, or NFA, for the Site.

**JULY 01, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Soil: No soil activities were required of or completed by RACER in 2024.

Groundwater: Groundwater RAR is being 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. The RAR is currently planned for submission to NJDEP in Q2 2025. Groundwater monitoring is continuing as routine OMM, with an annual sampling event completed in October 2024.

Monthly Monitoring well inventory and inspection responsibilities have been transferred to GTA (developer’s consultant). Monthly summary reports and photos have been received from GTA on a regular basis. Coordination of well relocations to accommodate additional construction is discussed with GTA and PTCUR and well locations are 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 tenants have moved in.

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

**Activities Completed**

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

Groundwater: 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 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 (developer’s consultant). 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, developer, 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 tenants have moved in.

## **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

**JULY 1, 2024 thru DECEMBER 31, 2024****Activities Completed**Mohawk Uplands Area

Received approval from USEPA for Final (100%) Remedial Design for the Mohawk Uplands Area on July 23, 2024.

O&M Activities

- Ongoing operation of GW recovery and treatment systems; average recovery and treatment of 14,500 gpd.
- GAC) changeout completed.
- Repaired portion of the St. Lawrence Riverbank that washed out during a heavy rain event (900-year storm) in August 2024.
- Completed annual groundwater monitoring in September 2024.
- Completed fish tissue sampling in September 2024.
- Mowed Landfill vegetative cover.
- USEPA conducted Site inspection associated with 5-Year Review.
- NYSDEC issued letter indicating the riverbank slope repair required notification to Department under SPDES permit requirements; RACER to address in the first quarter 2025.
- Key RACER submissions this period included:
  - Monthly Progress Reports.
  - Monthly SPDES Equivalent DMRs.

**Status**

Awaiting comments on 2023 Sediment Sampling Report (submitted March 7, 2024). Awaiting further comments on Interim Site Management Plan (revision submitted March 12, 2024).

**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.

O&M 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 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, 2024 thru DECEMBER 31, 2024****Activities Completed**Storm Water and Groundwater Treatment and Discharge

- Performance of routine O&M of stormwater treatment system.
- Sampling and reporting for permitted outfalls 003 and 005.
- Routine O&M of thinner area groundwater collection system.

Vapor Intrusion Mitigation Program: Routine O&MOn-Site and Off-Site RI/FS and Risk Assessment Program

- NYSDEC and RACER have been working towards a new Consent Order that will facilitate NYSDEC taking on the PDI, RD and RA activities for OU1. RACER and NYSDEC continued to collaborate on drafting the Order during this period.
- RACER supported USEPA with OU2 access agreements, enabling USEPA to issue requests for property access for RA implementation.
- RACER responded to property owner requests for information and clarification on the approved OU2 RD and assisted USEPA on the ground in securing Access Agreements.
- Continued bi-weekly conference calls with NYSDEC and USEPA to discuss OU1 and OU2 activities.

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

Redevelopment: Continued coordination with new property owner and Agencies for Tenant Use Notices and redevelopment activities

**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 continue to work on finalizing a new Consent Order pertaining to RACER funding OU1 PDI and RD activities. RACER and NYSDEC continue to collaborate on the draft Order language.

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

- Performance of routine O&M of stormwater treatment system.
- Sampling and reporting for permitted outfalls 003 and 005.
- Routine O&M 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 O&M.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.

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

- 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 offsite 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 heavy rain during the Spring.

**Status**

The selected OU1 remedy is presented in 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 was transitioned to USEPA.

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

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

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

**Status**

Inspection of the Ley Creek south bank (which is technically part of the Ley Creek PCB Dredgings Subsite) indicates that erosion has occurred and bank restoration activities may be required. Following evaluation of the banks in May 2023, necessary actions to address bank erosion were incorporated into the 100% Remedial Design for OU2 of the Site 10100- Former IFG Facility. As a result, repairs to the Ley Creek bank will be completed as part of this RA. 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.

**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.

## 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

**JULY 1, 2024 thru DECEMBER 31, 2024**

**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 Cap and Leachate Collection System, and semi-monthly OMM of the FDA, FSP, and leachate collection system. Revised and submitted CMP based on USEPA comments. Completed and submitted the Annual Report for 2024 activities.

**Status**

No change in status.

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Field activities included OMM of the two closed RCRA units, monthly DN-13 effluent sampling in accordance with NPDES permit, and collection of groundwater samples for Site-wide groundwater monitoring program. Replaced flow meter for DN-13 discharge. 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 drilling program associated with the USEPA approved the Corrective Measures Implementation Plan.

**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 IRZ zones through groundwater conditions via additional groundwater sampling. Continued operation of Phase I 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.

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

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

Performed Landfill Post Closure Operations including leachate removal, groundwater monitoring, and bi-weekly inspections of the landfill in accordance with Post Closure Plan. Submitted a memorandum describing proposed reductions of Post Closure Plan monitoring and maintenance activities for Ohio EPA meeting discussion purposes. Based on Ohio EPA meeting outcome, submitted draft Post Closure Plan for the closed RCRA Landfill to reduce required monitoring and maintenance activities. Completed installation of the final remedy cover included in the CMI Work Plan. Prepared and submitted the CMI Construction Completion Report. Prepared draft and revised draft CA550 report for agency use.

**Status**

No change in status.

**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 CMI to Ohio EPA for cover as final remedy.

**Status**

No change in status.

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

**JULY 1, 2024 thru DECEMBER 31, 2024**

**Activities Completed**

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

**Status**

No change in status.

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

**Activities Completed**

Performed field activities associated with O&M of the SSDS. Conducted Site visit to ensure SSDS was operating properly.

**Status**

No change in status.