The entire Buick City site encompasses just under 413 acres north and south of Leith Street and is among the largest properties in the RACER portfolio. The parcels are referred to as the Northend and the Southend, with Leith Street as the dividing line. Four transactions totaling 80 acres have been completed, and the remaining 332 acres are under contract with an industrial developer.

This property originally was developed in the late 1800s for the purpose of producing the “horseless carriage.” In 1903 the Buick Motor Company was established at the site as an automobile producer, and various automotive production activities occurred at the site in the following decades. General Motors (GM) conducted operations in production facilities located in both the Northend and Southend. Production activities in the Southend ended in 1999 and the buildings were demolished in 2000 and 2002. The manufacture and assembly of various transmission and engine components continued in the Northend until 2010. Demolition of the buildings in the Northend was completed from 2010 to 2012. No further demolition activity is anticipated. The site has a mix of zoning designations, consisting of Heavy Manufacturing, Heavy Commercial, Business, and Residential.

Environmental investigation and remediation activities are under way at the property to address historic releases to soil and groundwater, as well as LNAPL (Light Non-Aqueous Phase Liquid) and PFAS (Per- and polyfluoroalkyl substances) impacts, including infiltration into certain site storm sewers.

Cleanup activities are performed by RACER Trust, with the approval and oversight of the Michigan Department of Environment, Great Lakes and Energy (EGLE). The Settlement Agreement that established RACER Trust budgeted $33 million for cleanup work at this site.

Environmental History

Numerous historical investigations have been performed at the site to assess soil and/or groundwater impacts. The investigations have focused primarily on LNAPL, chlorinated solvents, lead, manganese and, since 2018, PFAS, an emerging contaminant whose presence was not known at the time of the Settlement Agreement. The
investigation of possible PFAS impacts was initiated because the types of manufacturing activities GM engaged in are associated with the use of PFAS-containing materials. Understanding and addressing PFAS impacts are challenging tasks because the knowledge, experience, capacity, and tools to investigate and remediate PFAS impacts are still developing. In March 2000, GM signed an Administrative Order on Consent (AOC) with the U.S. EPA, which served as the lead regulatory oversight agency for the property until 2020, when primary oversight was transferred to EGLE. The AOC formalized the requirements for a comprehensive investigation of the property, followed by appropriate corrective measures for any releases posing unacceptable risks to human health and the environment. On September 29, 2011, RACER Trust signed an updated AOC with EPA (2011 AOC). Since the entry of the 2011 AOC, RACER Trust has pursued corrective action at the site in accordance with the 2011 AOC and Settlement Agreement.

Investigation and remediation efforts at the property have been focused on characterizing risks at 17 LNAPL areas; operating a remedial system to remove LNAPL at one area; monitoring groundwater impacts from volatile organic compounds (VOCs) and select metals; identifying and eliminating potential pathways for off-site discharge of PFAS-impacted groundwater and storm water through National Pollution Discharge Elimination Systems (NPDES)-permitted storm sewer outfalls; addressing oil discharge from four storm sewer outfalls; closing releases from historic leaking underground storage tanks; closing several former hazardous waste storage units; and addressing lead- and polychlorinated biphenyl-impacted soils.

Beginning in 2020 and carrying into 2021, RACER completed the reroute of a major storm sewer line (leading to Outfall 003) to avoid LNAPL and PFAS migrating into the old storm sewer (which is now abandoned), significantly reducing the potential release of PFAS and LNAPL to the Flint River. Work also has focused on removing old, abandoned sanitary sewer connections and related PFAS discharges to the City of Flint wastewater system in support of the City’s efforts to meet its NPDES discharge requirements related to PFAS.

**Next Steps**

RACER and EGLE signed a Corrective Action Consent Order (CACO) in August 2020 that both parties agree is in the public’s interest for the protection of public health, safety, welfare, and the environment. In conjunction with the execution of the CACO, RACER and the U.S. EPA executed in August 2020 an Acknowledgement of Termination and Agreement on Record Preservation and Reservation of Rights related to the original 2011 AOC. In accordance with the Settlement Agreement, RACER has agreed to perform the corrective actions required by

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the CACO. Additionally, it is the parties’ understanding that the corrective actions required by the CACO will be carried out in a coordinated manner with any redevelopment of either the owned or non-owned portions of the property.

Site investigation work in 2021 has identified significant PFAS contamination at three locations: about 4.5 acres near Hamilton Avenue on the south end of the site; the former lagoon area of about 8 to 9 acres near Leith Street and James P. Cole Boulevard; and an area near the former “Foam Building” near Stewart Avenue of about 1 acre. The Hamilton Avenue area is a major issue and is the primary focus of further characterization work and evaluation of a range of potential remediation technologies due to the complex site conditions and high groundwater table in that area.

A plan to close and fill in Leith Street is being prepared to allow bulk heading of the drain lines under Leith Street that are contributing PFAS to Outfall 005. Further sampling of the remaining outfalls and work to reduce PFAS releases to the Flint River will continue. With EGLE approval, some remedies may be implemented as Interim Measures. Other activities include additional storm sewer and outfall studies; continued inspections and maintenance of storm water structures; and groundwater monitoring.