# Environmental Status Report

Updated Thru June 30, 2026

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**Acronym Definitions**

**A**
ACM: Asbestos-Containing Materials
ACO: Administrative Consent Order
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
CAMM: 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 Stormwater Pond

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

**H**
HRC: Hydrogen Release Compound

**I**
ICAP: Interim Corrective Action Plan
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
IX: Ion Exchange

**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 Incomplete
NPDES: National Pollutant Discharge Elimination System
NSZD: Natural Source Zone Depletion

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

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

**Q**
QAPP: Quality Assurance Project Plan

**R**
RA: Remedial Alternatives
RAP: Response Action (or Activity) Plan
RAR: Remedial Action Report

RAT: Remediation Advisory Team
RFI: RCRA Facility Investigation
RIR: Remedial Investigation Report
ROW: Right of Way
RSSCT: Rapid Small-Scale Column Test

**S**
SMA: Soil Management Area
SOW: Scope of Work
SPLP: Synthetic Precipitation Leaching Procedure
SSDS: Sub-Slab Depressurization System
STCM: Short-Term Construction Monitoring
SWPPP: Stormwater 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, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Submitted Year Four Groundwater Monitoring Report to DNREC as required by the LTS 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, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

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

Preparing the EPA semi-annual progress report, which details activities completed in the second half of 2025.

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Participated in calls with USEPA in March and May 2026 to discuss the status of the Site and monitoring wells on parcels previously owned by RACER.

Parcel 2 – Recorded the ERC Modification on March 4, 2026. USEPA submitted a letter on April 22, 2026, acknowledging that RACER has completed the requested tasks for Parcel 2 and USEPA has no further requests concerning Parcel 2 at this time.

Parcel 39 (Restoration) – Awaiting discussions with IDEM and USEPA related to ERC modifications.

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

Preparing the EPA semi-annual progress report, which details activities completed in the first half of 2026.

### Status

Submitting a letter requesting abandonment of select monitoring wells on parcels previously owned by RACER. Continuing to work with USEPA and IDEM to evaluate the potential for closure of Parcel 39.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

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

## JANUARY 1, 2026 through JUNE 30, 2026

### Activities Completed

Completed a semi-annual groundwater monitoring event during this reporting period. Prepared and submitted to USEPA the combined semi-annual progress and data report for the second half of 2025 and worked on preparing the first half of 2026 report. Received USEPA comments on the proposed LTS Plan for managing the institutional controls and groundwater monitoring submitted in June 2025. Reviewed USEPA's requested clarifications and modifications and updated the LTS. Currently considering request from EPA for updated QAPP.

### Status

Finalizing the LTS Plan and responding to any clarifications or modifications requested by USEPA. Completing semi-annual groundwater monitoring during the second half of 2026. Preparing summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

VI and mitigation activities south of the Site continued. Continued to monitor property transfers in the VI Focus Area, and contacted new owners of transferred properties to explain the investigation activities and attempt to gain access to sample previously inaccessible residences. Four (4) mitigation systems were inspected, and minor repairs were made during this reporting period. No significant deficiencies were found.

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

### Status

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

Completing the semi-annual groundwater sampling event and preparing an annual Progress Report for submittal to IDEM during the first half of 2026. Updating the groundwater monitoring plan, as needed, based on analytical data trends and overall plume footprint and migration. Working with IEDC as it continues to redevelop the real property that comprises the bulk of the Site.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Worked with property owner IEDC to complete the semi-annual groundwater sampling event for selected wells during this reporting period. Construction activities including building construction, utility installation, and roadway construction are on-going on-Site. Completed a Site walk with representatives from the IEDC environmental consultant and IDEM Project Management team on April 23, 2026. Continued to monitor property transfers in the VI Focus Area.

Prepared the 2025 Progress Report for submittal to IDEM during the first half of 2026 but waiting on comments from the 2024 Progress Report prior to submission. 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 has been implemented since Fall 2025.

Prepared a request to IDEM to remove monitoring wells MW-1104 and MW-1110 from the monitoring program. These monitoring wells had been planned for reinstallation following completion of construction operations, and IDEM approved such removal.

### Status

Continue to work with IDEM to evaluate groundwater data at and downgradient from the Site as it relates to potential VI. Current groundwater data indicates no VI impact into the neighborhood. Awaiting IDEM's response regarding the proposal to stop monitoring VI off-Site and cease operation and maintenance of the installed VI mitigation systems due to the reduction of VOC concentrations in groundwater. Pending IDEM's determination, RACER has suspended annual VI mitigation system OMM inspections. IDEM issued a soil NFA in 2014 and a 'Ready for Anticipated Use' in September 2024. Awaiting IDEM issuance of a 'Corrective Action Complete with Controls' determination for the Site

and an NFA determination letter that covers all the on-Site SWMUs and AOCs (aka AOIs) for which all the work has been done.

Completing the semi-annual groundwater sampling event during the second half of 2026. Prepared a request to IDEM to abandon multiple monitoring wells due to the updated monitoring plan implemented in Fall 2025 which will be submitted during the second half of 2026. Updating the groundwater monitoring plan as needed, based on analytical data trends and overall plume footprint and migration. Working with the IEDC as it continues to redevelop the real property comprising the bulk of the Site.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

Commenced the RFI Update Work Plan field work preparation.

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Prepared for and commenced the field work activities outlined in the RFI Update Work Plan approved by IDEM. Field work completed included private utility locating, borehole and monitoring well surveying, advancement of boreholes, collection of soil samples, collection of vertical aquifer samples, and installation of monitoring wells across the Site.

### Status

The Site's Corrective Action continues. A draft CMP will be prepared concurrently with the draft RFI Report update following completion of the field activities outlined in the approved RFI Update Work Plan. An ERC will be submitted to IDEM for review once the RFI Report and CMP are approved by IDEM.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

In accordance with the approved Groundwater Monitoring Plan, the 2025 Groundwater Monitoring Report was sent to IDEM on February 19, 2026.

### Status

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

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

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

### Status

Continuing to complete activities in accordance with the Post Closure Permit issued by IDEM: preparing and submitting the annual report and the groundwater statistical evaluation of samples collected in December 2025, operating extraction wells once approval from the municipal sewer authority is received, and completing the first of two semi-annual groundwater gauging events after pumping.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Completed RCRA inspections for first and second quarters and downloaded data from transducers placed in select monitoring wells. Continued the groundhog trapping program in 2026. Continued cap maintenance through mowing and weed removal. Received approval from the municipal water company to complete pumping from the extraction wells and 755,006 gallons of water were extracted and discharged during the May 2026 pumping event. Completed the first of two semi-annual groundwater gauging and sampling events after the pumping event in May and will report findings in accordance with the current Hazardous Waste Post-Closure Permit ("Permit") which expires on September 1, 2027. The 30-year Post-Closure Care period ended June 3, 2026. Worked on drafting the Certification of Completion of Post-Closure Care, which will be submitted during the second half of 2026.

### Status

Continuing to complete activities in accordance with the Permit. Preparing and submitting the groundwater statistical evaluation of samples collected in May 2026 and completing the second semi-annual groundwater gauging and sampling event in October 2026, which will be the final confirmation that the interior groundwater elevations satisfy the requirements of the Permit. Will finalize and submit the Certification of Completion of Post-Closure Care to IDEM by August 2026. Engaging with IDEM to discuss the Certification of Completion of Post-Closure Care and the Permit in relation to future work at the Site.

# KANSAS

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Prepared and submitted to KDHE the 2025 annual inspection report to support the EUC recorded for the Site.

### Status

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

# MASSACHUSETTS

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Submitted Year 18 OMM Report for Site. Conducted a semi-annual inspection in February 2026 (i.e., in Year 20). The event included inspecting the landfill and documenting and performing maintenance on the landfill cap and stormwater control features. Completed heavy landscape maintenance event which included removal of Japanese knotweed 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, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

IU H - WWTF Closure: None.

IU I – Classified Sands: None.

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

### Status

No change in status

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

IU G - Former Nodular Iron Plant OMM: Submitted 2025 Annual GSI Monitoring report to USEPA on March 23, 2026.

IU H - WWTF Closure: None.

IU I – Classified Sands: None.

RCRA Reporting and Other Reporting
- Preparation of response to USEPA comments dated July 17, 2025, regarding the June 2025 Pond Fill-in Work Plan (on hold).
- Participated in virtual meetings with USEPA on January 12, March 11, and May 11, 2026, to discuss current status and next steps.
- Submitted revision of draft DRC (1 of 5) on April 13, 2026, based on USEPA comments dated November 26, 2025. USEPA approved draft DRC 1 in a letter dated May 22, 2026.
- Submitted semi-annual progress report for the period of October 1, 2025 to March 31, 2026, to USEPA on April 15, 2026.
- Submitted PFAS Activity Summary email to USEPA and EGLE on April 15, 2026.
- Submitted Potential GSI Pathway for On-Site Wetlands email to USEPA and EGLE on May 7, 2026.
- Participated in virtual meeting with USEPA and EGLE on May 20, 2026, to discuss agencies' request for sampling groundwater and analyzing for PFAS in relation to concern that site-related PFAS could seep into the Saginaw River.
- Submitted 2026 Proposed PFAS Sampling email to USEPA and EGLE on June 16, 2026. USEPA provided comments on June 29, 2026.
- Revision of the CMP (on hold).

### Status

No change in status

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

Agreements/Work Plans/Reports

- Submitted Semi-Annual Progress Report (April 1 through September 30, 2025) to USEPA on October 29, 2025.
- Submitted Draft DRC to USEPA on September 30, 2025.

Site Investigation:

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Agreements/Work Plans/Reports

- Submitted Fall 2025 groundwater sampling report on February 25, 2026.
- Submitted Semi-Annual Progress Report (October 1, 2025 through March 31, 2026) to USEPA on April 15, 2026.

Site Investigation:

- Completed Spring 2026 semi-annual groundwater sampling between June 8-11, 2026.

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

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

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

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

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

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Corrective Measures – General & Institutional Controls:
- Conducted routine project update calls with USEPA in January, March, April, May, and June 2026.
- Submitted July-December 2025 Semi-Annual Progress Report to USEPA on January 15, 2026.

- Submitted the 2026 Property Inspection Report as final in March 2026. USEPA provided comments in May 2026 via email transmittal. As discussed during the monthly project update meeting with USEPA, RACER will address comments in the 2025 Property Inspection Report currently being prepared.
- Submitted Final 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 January 2026. Received April 2026 USEPA letter indicating that the property is not subject to regulation under RCRA and not subject to AOC RCRA-05-2011-00019.

Corrective Measures – Groundwater/LNAPL: Began preparation of a work plan for additional characterization of off-site groundwater.

Corrective Measures – Groundwater Monitoring:

- Submitted revised Groundwater Monitoring Plan (2025 Modification) to USEPA in February 2026. USEPA provided additional comments in March 2026. Submitted re-draft of the Groundwater Monitoring Plan (2025 Modification) in May 2026. Received emailed conditional approval letter from USEPA in June 2026.
- Submitted 2026 Fiero Temporary Monitoring Plan (TMP) to USEPA in February 2026. USEPA provided comments in March 2026, and a re-draft was submitted to USEPA in April 2026. Additional comments were discussed during the routine monthly Site status update meeting with USEPA, and RACER submitted another revised version to USEPA in May 2026. Received emailed conditional approval letter from USEPA in June 2026.
- Submitted the Fiero Off-Site VAP and SVMP Installation Work Plan in March 2026. USEPA provided comments in March 2026, and a revised Work Plan was submitted to USEPA in April 2026. Approval was provided by USEPA via email transmittal in May 2026.
- Conducted semi-annual groundwater and soil vapor monitoring at Former Fiero properties in March 2026, per USEPA conditionally approved 2026 TMP.
- Conducted the 2026 annual groundwater sampling event in March 2026, per USEPA discussion and conditionally approved Groundwater Monitoring Plan (2025 Modification).

Corrective Measures – Soil: Began preparation of RCRA Investigation Summary Report for all phases (except for first phase) of additional soil investigation conducted since 2024.

Sampling for PFAS: Submitted the Storm Sewer Sampling Results – July 2025 Memo as final in April 2026. USEPA approved the Memo in May 2026 via email transmittal.

Storm Sewers/Montcalm Seep:

- Conducted routine OMM associated with the Montcalm Street Seep Control System. These measures to prevent seepage of groundwater from the Site onto Montcalm Street continue to be successful.
- Submitted the revised Montcalm Seep Interim Measure Re-evaluation Memo to USEPA in February 2026, based on USEPA comments provided earlier in February 2026. USEPA provided further comments in April 2026, and RACER submitted a revised memo in May 2026. USEPA provided additional comments in June 2026.

Joslyn Avenue Investigations: Began preparation of the 2025 Joslyn Groundwater Sampling Summary.

## Status

No change in status.

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

## Activities Completed

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

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

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

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

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

Remedy Design, Implementation, and OMM:
- Completed temporary plugging of inverts within manhole MH-E-1 Northwest lateral to MH-H and north lateral to MH-G on July 3, 2025.
- Following plugging activities, collected samples from sanitary sewers in Hamilton Avenue and James P. Cole on July 15, 2025.
- Held virtual meeting with EGLE on August 20, 2025, to discuss revisions needed to the November 2023 Part 111 DRC.
- Held virtual meeting with EGLE on September 23, 2025, to discuss plugging and bulkheading that had been completed over the years and proposed inspections of select plugs and bulkheads.
- Submitted James P. Cole Sewer Upgradient Sampling Plan to EGLE on October 1, 2025, and received EGLE verbal approval during a virtual meeting and subsequently via a letter of November 12, 2025.
- Submitted Industrial Avenue Sanitary Video Inspection Work Plan to EGLE on October 9, 2025, and received EGLE comments and conditional approval via email on October 10, 2025. Provided a response to comments via email on October 13, 2025.
- Completed Industrial Avenue sewer line jetting on October 13, 2025, and completed a video inspection of the sewer on October 14, 2025.
- Re-inflated temporary plugs installed in MH-H-1A and MH-E-1 in Hamilton Avenue and sampled select sanitary sewer manholes in Hamilton Avenue, James P. Cole Boulevard, and locations upgradient from James P. Cole on October 14, 2025.

- Submitted Building 44 Pre-Design Investigation Work Plan to EGLE on October 15, 2025.
- Held virtual meeting on October 22, 2025 with EGLE MMD RAT to discuss the proposed groundwater extraction trench and treatment system remediation approach and the Building 44 Pre-Design Work Plan. Received approval of the rapid small-scale column test (RSSCT) portion of the plan via email on November 17, 2025. Received the RAT summary report including comments on November 18, 2025. Provided responses and received follow-up comments/acceptance to the Building 44 Pre-Design Investigation Work Plan comments included in the RAT Report via several emails before November 21, 2025.
- Completed geophysics investigation November 17-31, 2025, in the vicinity of the proposed groundwater extraction trench location.
- Completed vertical delineation soil borings November 24-26, 2025, and based on observations made during installation of these borings and discussion with EGLE, monitoring wells were not installed.
- Completed geophysics confirmation soil borings from December 1-12, 2025.
- Completed bulk groundwater collection on December 8-11, 2025, for use in the RSSCT that will test GAC and ion exchange (IX) resin.
- Completed additional sampling of select sanitary sewer manholes in James P. Cole Boulevard and locations upgradient from James P. Cole on December 17, 2025.

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

**Status**

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

**JANUARY 1, 2026 thru JUNE 30, 2026**

**Activities Completed**

Select Surface Cover Inspection: Completed the annual and semi-annual inspection of select surface cover areas in January and April 2026.

Maintain Booms on Outfalls: Completed inspections of and boom maintenance (as necessary) to Outfalls 003 and 005, as required by the April 2025 WRD ACO. Visual observations of these two outfalls were completed following each qualifying wet weather event in January-June 2026. Cameras were installed, with EGLE and City of Flint approval, at Outfalls 003 and 005 to allow inspections of the outfalls to be completed remotely to the extent possible in the future.

Agency Coordination/Negotiation, Reporting, and Project Management/Coordination:
- Prepared and submitted July-December 2025 Semi-Annual Report to EGLE on February 11, 2026, which also included an STCM Summary Report of data from monitoring completed in June, September, and November 2025.
- Inspected P-traps associated with Leith Street underpass French drain (which discharges into the Outfall 005 storm sewer) during STCM in March and June 2026.
- Held virtual meetings with EGLE on January 14, February 11, March 11, April 8, May 13, and June 10, 2026 to provide project status updates on activities completed and planned.
- Completed STCM Sampling in March and June 2026.

Compliance:
- Submitted Discharge Point Prioritization Report to EGLE on January 27, 2026. EGLE accepted the report on February 12, 2026.
- Submitted ICAP and Bulkhead Inspection Work Plan (Appendix to ICAP) to EGLE on February 27, 2026.

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

- Modifications to several outfalls were completed in coordination with the City of Flint on April 1 and May 11, 2026. Modifications provided for safer access and for channelization for more accurate flow readings for routine outfall sampling events required by the ACO.

Investigation and Sampling (including PFAS Related Activities):

- Submitted Building 44 Tracer Test Memo to EGLE on February 3, 2026.
- Submitted Building 44 Pre-Design Work Plan to EGLE on October 15, 2026. Submitted a revised Work Plan to EGLE on February 20, 2026, incorporating EGLE comments and changed conditions discussed during monthly update meetings and a RAT meeting.
- Revised the Building 44 Well Abandonment Work Plan (original submittal September 24, 2025), to incorporate EGLE comments and was re-submitted to EGLE on March 4, 2026.
- Revised the PFAS Groundwater Monitoring Work Plan (original submittal on October 1, 2025), to incorporate EGLE comments and re-submitted to EGLE on March 5, 2026.
- Submitted Building 44 Well Abandonment Summary Memo to EGLE on March 20, 2026.
- Surveyed select sanitary and storm inverts and sampled select sanitary manholes along James P. Cole Blvd. for PFAS analysis in March 2026.
- Submitted 2025 PFAS Groundwater Monitoring Summary Memo to EGLE on April 14, 2026.
- Submitted 2026 Roadway Monitoring Well Abandonment Work Plan to EGLE on May 1, 2026.
- Received draft comments from EGLE to the Groundwater Sampling Plan – Phase I Vapor Intrusion Work Plan on February 27, 2026. Participated in meeting among EGLE, RACER Trust, and Arcadis on March 19, 2026, to discuss comments. Additional comments were provided by EGLE on April 23, 2026. A subsequent meeting was held to discuss comments on May 13, 2026. Submitted a revised Work Plan to EGLE on May 18, 2026.
- Submitted 2026 PFAS Sampling Plan to EGLE on May 20, 2026.
- Submitted Building 44 Area PDI Summary Report on May 27, 2026.
- Redeveloped several monitoring wells in preparation for sampling associated within the 2026 PFAS Groundwater Monitoring Plan and Vapor Intrusion Work Plan Phase I in June 2026.
- Completed 2026 PFAS monitoring event June 15-26, 2026.

Remedy Design, Implementation, and OMM:

- Completed sampling at MH-E for PFAS analysis to verify upgradient plugs still in place and effectively reducing PFAS concentrations on March 25, May 14, and June 2, 2026. City of Flint took split samples during the May and June sampling events.
- Completed RSSCT Work in accordance with the PDI Work Plan in January 2026.
- Submitted draft DRCs to EGLE for Parcel 12B on April 21, 2026, and for Parcels 4 and 9 on May 19, 2026. A virtual meeting was held with EGLE to discuss the DRCs on June 16, 2026.
- Re-inflated temporary plugs present in MH-H-1A and MH-E-1 on May 5-6, 2026.
- Submitted Buick City 761.61(c) Request for Risk-Based Cleanup Approval to USEPA and copied to EGLE on June 17, 2026.
- Submitted email to EGLE and City of Flint detailing scope of work for the inspection of Outfall 002 manhole MH-18 and associated piping, as proposed in ICAP on June 26, 2026.

**Status**

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

Agency Coordination/Negotiation, Reporting & Project Management

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Groundwater Monitoring: Completed semi-annual groundwater monitoring event in March 2026.

Agency Coordination/Negotiation, Reporting & Project Management

- Prepared Second Half 2025 Progress Report and submitted to USEPA on January 12, 2026.
- Prepared Data Report summarizing the March 2026 groundwater monitoring event and submitted to USEPA on June 24, 2026.
- Received comments from USEPA on the November 2025 response to comments and revised draft Exposure Pathway Evaluation via email on June 29,2026.

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Corrective Action OMM: Following the GWTP's shutdown pilot test that commenced in March 2024, no groundwater has been collected or discharged (0 gallons from January-June 2026). The renewed GLWA Special Discharge Permit is effective through December 31, 2027. Collected groundwater elevation measurements and groundwater samples periodically within Area 1 to evaluate groundwater elevations and concentrations as part of the continued shutdown evaluation. Submitted a Summary of Area 1 Performance Monitoring Activities – July 2025 through December 2025 to USEPA on March 23, 2026, which proposed a reduced Area 1 performance monitoring plan. Collected groundwater samples from off-site Area 1 monitoring wells in April 2026 to evaluate off-site stability of boron, nickel, and PFAS-impacted groundwater.

Off-Site (AOI31) Vapor Intrusion Evaluation: Performed groundwater sampling to delineate sections of the northern boundary of the off-site TCE plume. Installed three new groundwater monitoring wells and soil vapor implants during delineation efforts. Completed an annual groundwater and soil vapor sampling event using sampling locations throughout AOI 31, and completed two quarters of performance monitoring groundwater and soil vapor sampling events for the permeable reactive barrier located upgradient of Newburgh Village Senior Living Facility. Continued performing in-home response activities associated with presence of TCE in sanitary sewer main along Grantland Street, including plumbing inspections/repairs and confirmatory indoor air sampling. Continued evaluating potential AOI 31 mid-plume remedial alternatives.

**Site 13020 – Eckles Road Cont'd**

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 April 2026 as part of the Area 1 Construction Groundwater Monitoring Plan, the Revised Interim Measures Work Plan, and Area 1 French Drain Collection System/Groundwater Treatment Plant Pilot Shutdown Work Plan to monitor PFAS groundwater impacts and effectiveness of the Area 1 soil-bentonite barrier wall and integrated cap and the ongoing Pilot Shutdown.

**Status**

Ongoing annual groundwater and soil vapor monitoring in the Grantland Street Neighborhood and Newburgh Village Senior Living Facility, and inspection and performance evaluation of two vapor mitigation systems, are to continue. No current unacceptable VI to indoor air exposures have been identified. Additional sampling and remedy to be completed in the mid-plume area and sanitary sewer main line along Grantland Street. The Area 1 French Drain Collection System/Groundwater Treatment Plan Pilot Shutdown evaluation activities continue and groundwater elevations within the Area 1 contained area appear stable. USEPA has requested a statistical analysis be completed to evaluate plume stability and guide future long-term monitoring requirements.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

Groundwater Monitoring: None.

Reporting: None.

PCB Soils Closure: None.

Corrective Action Reporting: None

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Groundwater Monitoring: None.

Reporting: None.

PCB Soils Closure: None.

Corrective Action Reporting: None

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

LNAPL Recovery System Installation: No activity during this period.

Implement RAP, Site OMM

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

LNAPL Recovery System Installation: No activity planned or completed during this period.

Implement RAP, Site OMM:

- Submitted the Saginaw Malleable and Green Point Landfill 2025 Annual Progress Report to EGLE on January 30, 2026.
- Received the CAMM Inspection Report from EGLE on February 20, 2026, and provided a response to EGLE on March 23, 2026. EGLE provided its acceptance of the response via an emailed letter dated April 23, 2026. Necessary maintenance work will be completed in late summer 2026 per the recommendation of the landscaper subcontractor.
- 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 on March 18, 2026.
- Performed annual groundwater monitoring event from April 20-24, 2026, 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.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

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

Completed repair activities to address EGLE's September 2025 CAMM Inspection Report.

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Revision to RAP, Consent Judgment, and OMM Plan:

- Preparation of the storm sewer modification construction completion report (on hold).
- Submitted a draft revised DRC to EGLE for review on April 29, 2026. EGLE responded via email on June 5, 2026, stating they completed a non-audit review and did not have any comments.

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

Site OMM Activities:

- Submitted the 2025 Annual Technical Progress Report to EGLE on January 30, 2026.
- Submitted the semi-annual compliance report for the period of July 1 to December 31, 2025, to City of Bay City on January 30, 2026.
- Completed required monthly inspections of the cap and containment system, as well as maintenance and level monitoring of CSC and MSA groundwater extraction and treatment system.
- Continued repair activities to address EGLE's September 2025 CAMM Inspection Report, including revision to the field inspection report, burrowing animal removal, and filling in burrows with soil.
- Completed semi-annual compliance monitoring for stormwater discharge to the City municipal sewer in June 2026.

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

OMM and Reporting:

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

OMM and Reporting:

- The soccer association leasing the Site performed necessary maintenance of the soil and vegetative cover.
- The 2026 annual soil cover inspection will be completed in Fall 2026.

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

Ongoing Landfill OMM:

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

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

PFAS Corrective Measures Evaluation and Implementation:

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### 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 27, 2026.
- Prepared Sanitary Sewer Use Permit Renewal Application and submitted the application to City of Flint Department of Public Works and Utilities Water Pollution Control on April 29, 2026.

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

- Accompanied EGLE during an inspection of the landfill cap on April 15, 2026, and EGLE sent a summary report on June 12, 2026. The concerns identified in the report were addressed during the second quarter, and a follow-up letter will be submitted during the Third Quarter 2026.
- Performed semi-annual groundwater monitoring well and leak detection vault sampling during the week of June 1, 2026.
- Conducted annual inspection and sampling for the leachate system sanitary sewer discharge with City of Flint Department of Public Works and Utilities Water Pollution Control on June 29, 2026.
- Properly abandoned seven monitoring wells which were identified as being damaged, redundant, or not part of any sampling program on April 13, 2026.

PFAS Investigation: Conducted annual PFAS groundwater and LDS sampling event the weeks of June 1 and June 8, 2026.

PFAS Corrective Measures Evaluation and Implementation:

- Prepared and submitted PFAS Activity Progress Report on January 20, 2026.
- Prepared and submitted Stanley Road Sanitary Sewer Update and a West of Site Sanitary Sewer Update on February 6, 2026, summarizing the results of the December 2025 sampling event.
- Completed sampling of private water supply wells on March 26, 2026.
- Prepared and submitted a Storm Sewer Evaluation Update on March 20 and June 2, 2026, summarizing the results of the December 2025 and April 2026 sampling events.
- Collected pond samples (SW-13 and SW-15) from the Middle and Western Ponds for PFAS on April 9, 2026, and for general water quality parameters on June 25, 2026.
- Conducted First Quarter 2026 stormwater inspection on April 16, 2026, and Second Quarter 2026 stormwater inspection on June 25, 2026.
- Mobilized temporary PFAS treatment system utilizing FLUORO-SORB® to the Western Pond and began operation on April 10, 2026, to remove PFOS prior to discharge to the municipal storm sewer system. The FLUORO-SORB® temporary PFAS treatment system operation was discontinued on May 29, 2026. A temporary PFAS treatment system utilizing GAC was then mobilized and began operation on June 16, 2026.
- Conducted First Quarter 2026 berm inspection on April 16, 2026, and Second Quarter 2026 berm inspection on June 25, 2026.

**Status**

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Additional Site-wide Investigation:

- An NFA report was completed for all contaminants in the area north of 301 36th Street SW and for all contaminants except PCBs for the adjoining railroad property and was submitted to EGLE on May 20, 2026.
- Began preparation of responses to USEPA's comments on the December 13, 2024, Draft Risk-Based PCB Cleanup Plan (Revision 1).

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

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

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

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

### Status

No change in status.

## JANUARY 1, 2026 thru June 30, 2026

### Activities Completed

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

- Submitted initial plan for Proposed LTM at the Site (through RIDE on February 13) for the next 10 years -GW Levels and GW Sampling
- Submitted well abandonment update (through RIDE on February 13) for EGLE review and approval based on Proposed LTM Plan.
- Conducted sampling for PFAS during wet weather conditions from Outfall 003 (84" Discharge) on March 26, and May 18, 2026. Ambient background (rain) samples also collected during each sample event.
- Completed the annual groundwater elevation gauging event on June 1, and June 2, 2026 per the Proposed LTM Plan.
- Drafted initial work plan for cleaning and closure activities for Vault E-19 manholes.

Groundwater Collection System: The system remained off through June 2026. System expected to remain off with no current plans for restarting.

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

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

Groundwater Monitoring: None.

PFAS Investigation: None.

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

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

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Groundwater Monitoring: None planned or completed.

PFAS Investigation: None planned or completed.

Vapor Intrusion Investigation:
- Summarized and submitted the December 2025 soil vapor sampling results on March 17, 2026.
- Completed an additional round of soil gas sampling on March 24, 2026.
- Installed two vapor probes nested at different detphs to further evaluate the vapor intrusion pathway in the northern portion of the Site on April 14, 2026.

Soil Evaluation: Completed soil sampling on April 14, 2026, to evaluate if an exposure barrier is needed in the middle portion of the Site and if the quality of the surficial soil in a small area is acceptable to serve as an exposure barrier.

Closure: None planned or completed.

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

### Status

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

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Post-Closure Care and Maintenance Program: On March 2, 2026, submitted letter to EGLE summarizing the 2025 semi-annual soil cover inspection. No significant issues were identified.

Completed a semi-annual soil cover inspection for the Windiate Park and Pengelly Road Lot 460 properties on June 17, 2026. No significant issues were identified.

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

Work Plans, Investigation, and Reporting:
- Held virtual meetings with EGLE and LBWL to present quarterly update on remedial progress in July and October 2025.
- Completed exposure barrier annual inspections in July 2025.
- Submitted Second Quarter 2025 Progress Report in July 2025.
- Completed semi-annual storm sewer sampling in October 2025.
- Submitted 2025 Semi-Annual Groundwater Sampling Report to EGLE in October 2025.
- Submitted Third Quarter 2025 Progress Report in October 2025.
- Completed select groundwater and soil gas sampling associated with Plant 6 in October 2025 for assessment of potential off-Site VI.

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

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

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

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

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

Lower 1,4-Dioxane Corrective Measures:
- Received conditional approval of the Revised Biosparge Shut Down Test Proposal from EGLE on July 21, 2025.
- Continued routine OMM of the biosparge systems at Plants 2 and 3 with limited downtime.
- Completed non-routine maintenance of biosparge systems as necessary.
- Collected performance groundwater monitoring samples during semi-annual groundwater monitoring event in Fourth Quarter 2025, per EGLE-approved 2025 Interim Monitoring Plan.
- Collected groundwater monitoring samples from select monitoring wells during Third Quarter 2025 as part of the biosparge shut down test.

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Work Plans, Investigation, and Reporting:
- Held virtual meetings with EGLE and LBWL to present quarterly update on remedial progress in January and April 2026.
- Submitted Biosparge Transect F Shutdown Request Memo to EGLE in March 2026.
- Submitted Plant 3 and Plant 6 Monitoring Well Abandonment/Reinstallation Plans to EGLE in March 2026.
- Submitted Lower 1,4-Dioxane Biosparge 2025 Progress Report to EGLE in April 2026.
- Completed semi-annual groundwater sampling in April 2026 per EGLE-approved 2025 Interim Monitoring Plan.
- Completed semi-annual storm sewer sampling in May 2026.
- Submitted First Quarter 2026 Progress Report in May 2026.
- Submitted 2025 Exposure Barrier Inspection Report to EGLE in June 2026.

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

LNAPL Gauging: LNAPL gauging frequency is annually in Fourth Quarter per EGLE-approved 2025 Interim Monitoring Plan. Therefore, no LNAPL gauging was completed this period.

Groundwater Monitoring: Completed routine groundwater monitoring and gauging during the Second Quarter of 2026 per EGLE-approved 2025 Interim Monitoring Plan.

Storm Sewer Sampling: Completed routine sampling of select storm sewer manholes during the Second Quarter of 2026 per EGLE-approved 2025 Interim Monitoring Plan.

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

PFAS Corrective Measures: Completed groundwater sampling for PFAS during the Semi-Annual groundwater sampling event in Second Quarter 2026 per EGLE-approved 2025 Interim Monitoring Plan.

Lower 1,4-Dioxane Corrective Measures:

- Collected groundwater monitoring samples from select monitoring wells during First and Second Quarters 2026 as part of the biosparge shut down test for Transects A and G.
- Continued routine OMM of the biosparge systems at Plants 2 and 3 with limited downtime.
- Completed non-routine maintenance of biosparge systems as necessary.
- Collected biosparge performance groundwater monitoring samples during semi-annual groundwater monitoring event in Second Quarter 2026, per EGLE-approved 2025 Interim Monitoring Plan.

**Status**

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Existing Building: The results of prior inspections are that the SSDS is operating as intended and is preventing vapor intrusion into the indoor air. The next SSDS OM&M inspection is scheduled for July 23, 2026.

Investigation and Reporting: There has been no additional investigation or reporting since the last semi-annual Status Report for this Site.

### Status

With EGLE concurrence on the Facility Investigation Completion Report (2024), the next step is to abandon the on-Site monitoring wells. RACER expects the recently assigned new EGLE Project Manager to approve abandonment of the monitoring wells in the first quarter of 2027. Monitoring of the SSDS will continue. Further activities are dependent on further review by and discussions with EGLE. Otherwise, no change in status.

# MISSOURI

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

### Status

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

## JANUARY 2026 thru JUNE 30, 2026

### Activities Completed

The Site is currently enrolled in the MDNR Superfund Environmental Remediation Program (Superfund Program). However, RACER intends to apply to MDNR for the Site to be transferred to the State's Brownfields/Voluntary Cleanup Program (BVCP). If approved by the MDNR, the Site will be transferred from the Superfund Program to the BVCP.

### Status

Preparing BVCP application. Pending approval, the Site will navigate through the BVCP towards closure.

# NEW JERSEY

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Routine OMM of the FPR system is ongoing. The Influent/Effluent Monitoring Report for the product recovery system was submitted to NJDEP in June 2026.

### Status

The work scope is proceeding as anticipated. OMM of the FPR system will continue. NJDEP has requested that a round of groundwater monitoring be conducted prior to its final review of the Groundwater RAP Application and issuance of the Groundwater RAP. Assuming all goes well, it is anticipated that the GW permit will be issued during the fourth quarter of 2026 or the first quarter of 2027. Issuance of the GW permit will be akin to an NFA for the site with LTOMM being the only EA work going forward.

## JULY 01, 2025 thru DECEMBER 31, 2025

### Activities Completed

Soil: No soil activities were required or performed in 2025.

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

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Soil: The Soil RAR was submitted on October 17, 2016, and amended on May 10, 2017. NJDEP issued the Soil Remedial Action Permit on November 1, 2016. A Restricted Use Soil-Only RAO was subsequently issued on June 21, 2018, and amended in January 2021 to accommodate the property subdivision.

Responsibility for soil remediation activities has since been transferred to the developer, PTCUR, since the site is being developed for residential use. Accordingly, no soil-related activities were required or performed during 2026.

Groundwater: Groundwater monitoring continues as part of routine OM&M activities. The annual groundwater sampling event was completed between February 10 and 19, 2026.

Responsibility for monthly monitoring well inspections and inventory management has been transferred to GTA, the developer's environmental consultant. Monthly inspection reports and photographs have been received regularly and are reviewed during recurring coordination meetings to discuss observations, maintenance needs, and other findings. Copies of all reports and photographs are being maintained for project records. Planned construction activities continue to be coordinated with GTA and PTCUR, and monitoring well locations will be adjusted as necessary by the developer's drilling contractor and consultant. However, several outstanding items remain overdue from PTCUR and GTA, including monitoring well replacement documentation and survey information, which may hinder project progress.

The Groundwater RAR, submitted on August 1, 2025, remains under NJDEP review. On April 28, 2026, NJDEP indicated that a supporting Preliminary Assessment Report (PAR) had not been provided to substantiate the off-site source determination and questioned the basis for a groundwater-only submission. Haley & Aldrich responded on May 1, 2026, providing documentation of the previously completed PAR and Soil RAR. NJDEP subsequently indicated that the prior PARs were not certified, nor prepared under the current ISRA case, and were therefore not acceptable. Discussions regarding this issue remain ongoing.

On May 15, 2026, NJDEP issued an NOI Key Document Submittal Comment Letter regarding its review of the Groundwater RAR. The NOI focused on potential VI concerns associated with the proposed residential

redevelopment. A response was prepared and submitted to NJDEP on July 10, 2026, explaining that remediation necessary to support residential land use falls under the responsibility of the developer, PTCUR. The response incorporated VI data provided by GTA on behalf of PTCUR and was submitted concurrently with additional supporting documentation.

## Status

Soil remedial work is complete at the Site. The groundwater remedial efforts will continue until the groundwater RAP is obtained and the RAO is accepted by NJDEP. The Site 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, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

OMM Activities:

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

Key submissions this period included:

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Mohawk Uplands Area: A cultural resources survey was completed in June 2026.

O&M Activities

- Ongoing operation of the groundwater recovery and treatment systems; average recovery and treatment of 15,300 gpd.
- Completed groundwater monitoring event in April 2026 (MW-302S and MW-302D).
- Mowed Landfill vegetative cover.
- Inspected and reseeded wetland vegetation restoration at Outfall 003 area.

Key submissions this period included:

- Monthly Progress Reports.
- Monthly SPDES Equivalent DMRs.
- Documentation of the inspection and reseeding of the wetland vegetation restoration performed at Outfall 003.

### Status

Awaiting further comments on the Interim Site Management Plan.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

Vapor Intrusion Mitigation Program:
- Routine OMM
- Conducted the annual sub-slab depressurization system (SSDS) inspection in December 2025.

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

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

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Stormwater and Groundwater Treatment and Discharge
- Performance of routine operation and maintenance of stormwater treatment system.
- Provided NYSDEC communication regarding planned filtration test to address biological fouling.
- Performed carbon change-outs for GAC1.

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

- Influent backwash re-piping was implemented to use treated water instead of wet well water for backwashing the MMFs.
- New anthracite was added to the MMFs.
- Sampling and reporting for permitted outfalls 003 and 005.
- Routine operation and maintenance of thinner area groundwater collection system.

Vapor Intrusion Mitigation Program
- Routine O&M
- will conduct the annual sub-slab depressurization system (SSDS) inspection in December 2026.

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

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

Redevelopment
- Continued coordination with new property owner and Agencies for Tenant Use Notices and redevelopment activities.
- Notification 81 was submitted for bollard installation around an existing fire hydrant on the west/northwest side of the facility. The work has yet to be scheduled.

## Status

No change in status.

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

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

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

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

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

### Status

During routine agency conference calls for the Former IFG Facility (Site 10100), continued discussions with NYSDEC and USEPA representatives regarding repairs to the pipes. Conversations with stakeholders are planned and a mitigation solution has not yet been selected. If performed by RACER, the 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, 2025 thru DECEMBER 31, 2025

**Activities Completed**

Performed OMM of Cap and Leachate Collection System, semi-monthly OMM of the Former Disposal Area (FDA), Former Stormwater Pond (FSP), and leachate collection system.

**Status**

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

**Activities Completed**

Performed OMM of Cap and Leachate Collection System, and semi-monthly OMM of the FDA, FSP, and leachate collection system. Completed and submitted the Annual Report for 2025 activities.

**Status**

No change in status.

**OH – EPA – Site 13170 - Moraine Facilities**

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Performed OMM of the two closed RCRA units. Repaired and reactivated lower aquifer extraction well DN-13 and resumed monthly 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 Dynamic DGR for the Riverview Neighborhood, and Heidelberg modified the extraction well housings to accommodate a newly constructed parking lot. O&M activities were also completed in the downgradient neighborhood related to the VI mitigation program. Submitted 2025 Site-Wide Annual Groundwater Monitoring Report, the Semi-Annual Progress Report, and source area performance monitoring memorandums. Continued with groundwater and methane monitoring associated with source treatment in the PSA Building as part of the Corrective Measures Implementation Plan. Evaluated remedial options for the diffuse upper aquifer plume. Completed annual slab inspections for the Fuyao and former PSA buildings. Continued to work with USEPA on drafting the Environmental Covenants to be filed on each parcel at the Site.

### Status

No change in status.

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

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Performed Landfill Post Closure Operations in April 2026, including biennial groundwater sampling and semi-annual landfill inspections. Performed annual ACM inspection in accordance with the Risk Mitigation Plan and annual monitoring well gauging in accordance with the Groundwater Monitoring Plan in April 2026. Submitted a draft OMM to Ohio EPA in April 2026. Ohio EPA issued the Site Decision Document in April 2026. Ohio EPA provided comments on the draft OMM Plan in May 2026. Submitted Final OMM Plan in June 2026.

### Status

No change in status.

## JULY 1, 2025 thru DECEMBER 31, 2025

### Activities Completed

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

### Status

No change in status.

## JANUARY 1, 2026 thru JUNE 30, 2026

### Activities Completed

Performed field activities associated with OMM of the SSDS. Conducted Site visit to ensure SSDS was found to be shutdown. Plans were initiated to replace the fan and get the system back into operation.

### Status

No change in status.