



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GAYLORD FIELD OFFICE



C. HEIDI GREETHER
DIRECTOR

October 22, 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

 **FILE**

Major General Leonard Wesley Isabelle
Michigan Air National Guard
Department of Military and Veterans Affairs (DMVA)
3411 North Martin Luther King Jr. Boulevard
Lansing, Michigan 48906

Colonel John Miner
Michigan Air National Guard
Headquarters, Alpena Combat Readiness Training Center
5884 A. Street
Alpena, Michigan 49707-8125

Dear Sirs:

SUBJECT: Compliance Communication Regarding a Release of Per- and Polyfluoroalkyl Substances at the Alpena Combat Readiness Training Center, M-32 West of Alpena, Alpena County, Michigan; Facility ID No. 04000176

The Department of Environmental Quality (DEQ) has information indicating environmental contamination is present on the Alpena Combat Readiness Training Center (ACRTC) property located at M-32 West of Alpena (Property). Subject to Michigan's environmental cleanup law, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Part 201), the DEQ considers the Michigan Air National Guard (MIANG) responsible for the contamination. The DEQ appreciates the work that the MIANG has completed to date on this issue.

The ACRTC has had several areas of environmental concern where past soil and groundwater investigations have taken place leaving groundwater monitoring wells in place to monitor areas of groundwater contamination. Several of the existing monitoring wells at the ACRTC were sampled and analyzed for Per- and Polyfluoroalkyl Substances (PFAS). PFAS compounds include perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS). These substances are commonly found in aqueous film forming foam (AFFF) which were historically used at the ACRTC for fire-fighting and training.

Analytical results of the groundwater samples taken from monitoring wells at the Property showed the presence of PFOA and PFOS at 82,000 parts per trillion (ppt). The DEQ began sampling residential water wells around the ACRTC in November 2017.

Pursuant to Part 201, the DEQ established criteria for groundwater used for drinking water for PFOA and PFOS. The cleanup criteria established under Part 201 for PFOA and PFOS is 70 ppt either individually or combined, which is consistent with the U.S. Environmental Protection Agency lifetime health advisory. PFOA and PFOS are hazardous substances under Part 201. The concentrations found in the groundwater samples collected at the ACRTC confirm that groundwater at the Property is contaminated with hazardous substances above Part 201 criteria.

An area where hazardous substances exceed the criteria for unrestricted residential use is known as a Facility as defined in Part 201, which triggers obligations under the law. The concentration of PFOA and/or PFAS found at the Property makes it a Facility regulated by Part 201, and steps are required to clean up the contamination. Persons who are liable for a Facility pursuant to Section 20126 of Part 201 include persons who owned or operated a facility at the time of the release and are responsible for an activity causing that release. The MIANG's use of AFFF which contained PFAS constituents while it operated the ACRTC was an activity causing a release.

Contamination data at the Property also indicates PFAS may have moved beyond the Property into areas where groundwater is currently used for drinking water. As a result, numerous residential drinking water wells are threatened, with some having confirmed detections of PFAS. As a liable party under Section 20126 of Part 201, MIANG has an affirmative obligation to comply with Section 20114 of Part 201, which lists the requirements of a liable party to address environmental contamination. These steps include, as applicable:

- Immediately taking measures to contain or remove the contamination source
- Immediately identifying and eliminating any threat of fire or explosion or direct contact hazards
- Notifying the DEQ and affected neighbors if contamination has migrated off the Property
- Delineating the extent of the contamination
- Undertaking the cleanup of the contamination

Additional requirements under Section 20114 of Part 201 may apply to this situation.

Pursuant to Section 20114 of Part 201, the DEQ is requesting submittal of a Work Plan and schedule for conducting response activities within 45 days to address the PFOA and PFOS contamination at the M-32 West of Alpena facility. Under the provisions of Part 201 Section 20114, the owner or operator of a facility shall diligently pursue response activities necessary to achieve the cleanup criteria. Michigan's standards must be achieved under CERCLA in accordance with Section 121(d), 42 U.S.C. § 9621(d).

The Work Plan activities shall also include but are not limited to the following:

- Regularly monitor existing area residential wells for PFAS to ensure levels in drinking water wells are stable and/or below criteria. DEQ recommends using the United States Environmental Protection Agency's method 537 Rev. 1.1, September 2009.

- Fully delineate and characterize the PFAS plume(s) caused by the releases both on and off-site, focusing first on the areas upgradient of the contaminated residential wells. Given that the groundwater on the Property flows in several different directions, full delineation is imperative to understanding the movement and risks associated with the PFAS contamination.
- Identification and mitigation of other receptors and potential exposure pathways to the PFAS impacts.
- Implement a sentinel monitoring well system to assure higher level PFAS contamination is not moving toward additional areas where the groundwater is used as a drinking water source.

Finally, the DEQ urges the MIANG to provide an alternate drinking water source to affected well users. We urge this for three principle reasons:

1. Until the plume(s) are fully delineated, there is no certainty that higher-level contamination is not impacting drinking water wells in the vicinity.
2. The wells are impacted with several PFAS for which there is insufficient health-based data to determine toxicity.
3. It is unknown how long and at what concentrations well users have been exposed to these contaminants through their drinking water.

The DEQ is requesting MIANG to submit the above-referenced Work Plan within 45 days of receipt of this letter to the following address:

Dave Lindsay, Project Manager
Gaylord Field Office
Remediation and Redevelopment Division
Michigan Department of Environmental Quality
2100 West M-32
Gaylord, Michigan 49735
Telephone: (989) 705-3447
Email: lindsayd@michigan.gov
Fax: (989) 731-6181

The DEQ requests that MIANG take the necessary steps to comply with Part 201. The MIANG may want to confer with an environmental consultant to assist in complying with the provisions of Part 201.

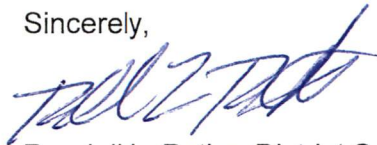
The explanations of Part 201 in this letter should not be considered a complete listing of the MIANG's legal obligations. The complete Part 201 statute and rules can be found at the DEQ Web site: www.michigan.gov/deq, by clicking on 'Land', 'Remediation', then 'Laws & Rules'.

The information used to prepare this letter is located in the DEQ, Gaylord District Office, 2100 West M-32, Gaylord Michigan, 49735. If the MIANG wishes to review this information or if the MIANG has questions regarding this letter, please contact Mr. Dave Lindsay, Project Manager, at (989) 705-3447; lindsayd@michigan.gov; or you may contact me at the telephone number listed below.

If the MIANG wishes to submit any factual information regarding liability under Part 201 or provide information that will demonstrate the MIANG is in compliance with Part 201, please send it to the address provided above for consideration.

The DEQ appreciates the cooperation the MIANG has provided in past environmental issues and we stand ready to assist the MIANG in any way possible to address this difficult situation.

Sincerely,



Randall L. Rothe, District Supervisor
Remediation and Redevelopment Division
Gaylord Field Office
(989) 705-3416
rother@michigan.gov

cc: Lt Col. James Shay, Director of Personnel/A1, MI ANG
Lt Col. Mark Sitterly, Environmental Manager, MI ANG
Mr. Jonathan Edgerly, Environmental Manager, W NFG (US)
Mr. Scott Smith, District Health Department #4
Ms. Denise Bryan, District Health Department #4
Ms. Carol Isaacs, Governor's Office
Mr. Kory Groetsch, Department of Health and Human Services
Ms. C. Heidi Grether, Director, DEQ
Mr. Aaron B. Keatley, Chief Deputy Director, DEQ
Mr. Scott Dean, Communications Director, DEQ
Mr. Steve Sliver, PFAS Executive Lead, DEQ
Ms. Susan Leeming, RRD Director, DEQ
Ms. Kathy Shirey, RRD Assistant Director, DEQ
Mr. Mitch Adelman, RRD Field Operations Manager – East, DEQ
Mr. Joshua Mosher, RRD C&E Manager, DEQ
Mr. Michael Jury, DEQ
Ms. Amy Peterson, DEQ
Mr. Dave Lindsay, Project Manager, DEQ
Ms. Heidi Pixley, District Enforcement Coordinator, DEQ

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Michigan Air National Guard

Department of Military and Veterans Affairs

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Sent To

Colonel John Miner
Michigan Air National Guard Headquarters

Alpena Combat Readiness Training Center
5884 A Street

PS Form 3800, April 2013 PSN 7530-02-000-9047

See Reverse for Instructions

Alpena, Michigan 49707-8125