



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

August 26, 2021

Compliance Communication No. CC-003495

VIA E-MAIL

Ms. Carla Lange
Camp Grayling
Environmental Office
Building 100A
Grayling, Michigan 49739

Dear Ms. Lange:

SUBJECT: Groundwater Discharge Permit No. GW1810158
Designated Name: MDMVA-Camp Grayling
Part 22 Rules Request
Per- and Polyfluoroalkyl Substances (PFAS)
Compliance Communication

On July 27, 2020, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Water Resources Division (WRD), received the results of the groundwater monitoring well sampling conducted on April 22 and 30, 2019, at the Michigan Department of Military and Veteran Affairs (MDMVA)-Camp Grayling site (MDMVA Camp Grayling), located at the Environmental Office, Building 100A, Grayling, Michigan. Groundwater monitoring for PFAS was conducted as part of the Site Inspection and reported in the *Final Site Inspection Camp Grayling JMTC, Cantonment and Lake Margrethe, MI*, dated July 2020. The sampling results indicated that environmental contamination is present in the groundwater at several of the MDMVA-Camp Grayling monitoring wells. Michigan's environmental cleanup law, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); and the Part 22, Groundwater Quality, Administrative Rules promulgated pursuant to Part 31, Water Resources Protection, of the NREPA (Part 22 Rules); identify actions or precautions an entity needs to take with respect to environmental contamination. Owners and operators of contaminated property may have responsibilities associated with that contamination.

Sample results identified groundwater impacts of perfluorooctanoic acid (PFOA) above the applicable criteria contained in the Administrative Rules of Part 201 of the NREPA that became effective on August 3, 2020. The sample results exceeding groundwater protection criteria are summarized below:

Sample Location	Sample Date	Pollutant	Result (ng/L)	Applicable Criteria (ng/L)
AOI 20-MW-01	4/22/19	PFOA	11.7	8
A01 20-MW-15	4/22/19	PFOA	18.4	8

The concentrations of PFOA in groundwater that exceed the applicable Part 201 criteria in compliance Monitoring Wells AOI 20-MW-01 and AOI 20-MW-15 are a violation of Rule 323.2204 and constitute a violation of Groundwater Discharge Permit No. GW1810158.

EGLE is requesting additional sampling per Rule 2227 to further evaluate the cause of PFAS in the groundwater at MDMVA-Camp Grayling.

Please conduct the following sampling and submit a report, including the analytical lab reports and a description of the sampling methods used, to EGLE via MiWaters by October 29, 2021.

1. Sample the WWTP influent and effluent.
 - a. Sampling guidance for wastewater is available at:
https://www.michigan.gov/documents/pfasresponse/Wastewater_PFAS_Sampling_Guidance_636791_7.pdf
2. Sample downgradient groundwater Monitoring Wells MW-8, MW-10, MW-11, and MW-14 for PFAS.
 - a. Sampling guidance for groundwater is available at:
https://www.michigan.gov/documents/pfasresponse/Groundwater_PFAS_Sampling_Guidance_637871_7.pdf

Note, all samples shall be analyzed for EGLE's PFAS Minimum Laboratory Analyte List (https://www.michigan.gov/pfasresponse/0,9038,7-365-88059_95747---,00.html).

EGLE encourages the MDMVA to become familiar with Part 201 of the NREPA and the Part 22 Rules, and requests that the MDMVA take the necessary steps to comply with the provisions of the law that may apply. The MDMVA may want to confer with an environmental consultant to assist in complying with the provisions of Part 201 of the NREPA and the Part 22 Rules. The explanations of Part 201 of the NREPA and the Part 22 Rules in this Compliance Communication should not be considered a complete listing of the MDMVA's legal obligations under the law. The Part 201 statute and rules can be found in their entirety at the EGLE Web site: www.michigan.gov/egle, by clicking on 'Land,' 'Remediation,' then 'Site Investigation and Remediation.' The Part 22 Rules can be found at: <http://www.deq.state.mi.us/documents/deq-wmd-qwp-part22.pdf>.

If the MDMVA has factual information it would like EGLE to consider regarding this Compliance Communication, please provide this with the written response.

Compliance with the terms of Compliance Communication No. CC-003495 does not relieve the MDMVA of any liability, past or present, from the failure to meet the conditions specified in, or failure to comply with, Groundwater Discharge Permit No. GW1810158, Part 201 of the NREPA, and the Part 22 Rules of the NREPA.

EGLE appreciates the MDMVA's cooperation in addressing this matter. Should the MDMVA require further information regarding this Compliance Communication, please contact Mr. Matthew Pfister, Environmental Quality Analyst, Emerging Pollutants Section, at

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517-667-1073; PfisterM@michigan.gov; or EGLE, WRD, Emerging Pollutants Section,
525 West Allegan Street, P.O. Box 30473, Lansing, Michigan 48909-7973.

Sincerely,



Stephanie Kammer, Manager
Emerging Pollutants Section
WRD, EGLE
517-897-1597

sk/sea

cc: Mr. Jonathon, Edgerly, MDMVA (electronic)
Ms. Amy Handley, MDMVA (electronic)
Ms. Patricia Lyman, MDMVA (electronic)
Mr. Jon Russell, EGLE
Mr. Brian Jankowski, EGLE
Ms. Sydney Ruhala, EGLE
Mr. Mathew Pfister, EGLE
Ms. Kristine Rendon, EGLE
Ms. Marissa Buehler, EGLE
Mr. Dave Walters, EGLE
Mr. Randy Rothe, EGLE
Mr. Christiaan Bon, EGLE