



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-003462

VIA E-MAIL

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

Dear Ms. Lange:

**SUBJECT:** EGLE Groundwater Discharge Permit No. GW1810156  
Designated Name: MDMA-Camp Grayling-MATES  
Part 22 Rules Request  
Per- and Polyfluoroalkyl Substances (PFAS)  
Compliance Communication

On October 22, 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 August 2, 2018, and October 19, 2018, at the Camp Grayling Maneuver Area Training Equipment Site (Site) located at 2450 North Down River Road, Grayling, Michigan. Groundwater monitoring for PFAS was conducted as part of the Site Inspection and reported in the *Final Site Inspection Report for Range 30 Complex and MATES Camp Grayling JMTC, MI*, dated October 2020. The sampling results indicated that environmental contamination is present in the groundwater at the Site. 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) and perfluorooctane sulfonic acid (PFOS) 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)
MATE-MW-3	8/2/2018	PFOA	13.5	8
MATE-MW-3	8/2/2018	PFOS	137	16
MATE-MW-3	10/19/2018	PFOS	142	16

Sample Location	Sample Date	Pollutant	Result (ng/L)	Applicable Criteria (ng/L)
MATE-MW-8	8/2/2018	PFOS	17.3	16
MATE-MW-8	10/19/2018	PFOS	32	16
Temporary Well 8-2	10/25/2018	PFOS	7810	16
Temporary Well 8-2	10/25/2018	PFOA	60.7	8
Temporary Well 8-3	10/25/2018	PFOS	397	16
Temporary Well 8-9	10/29/2018	PFOS	41	16
Temporary Well 8-10	10/30/2018	PFOS	18.3	16

The concentrations of PFOA and PFOS in groundwater that exceed applicable Part 201 criteria in compliance Monitoring Wells MATE-MW-3 (PFOA and PFOS) and MATE-MW-8 (PFOS only), as well as temporary Monitoring Wells 8-2 (PFOA and PFOS), 8-3 (PFOS only), 8-9 (PFOS only), and 8-10 (PFOS only) are a violation of Rule 323.2204 and constitute a violation of Groundwater Discharge Permit No. GW1810156.

EGLE is requesting additional sampling of waste streams flowing into and at the Site's Wastewater Treatment Plant (WWTP), per Rule 2227, to determine the extent and potential source(s) of PFAS contamination to the groundwater.

**Please conduct the following sampling and submit the requested report to EGLE via MiWaters by October 29, 2021.**

1. Sample wastewater at the following locations for PFAS:
  - a. Wastewater prior to the organoclay and Granular-Activated Carbon (GAC) filters (i.e., filter influent).
  - b. Wastewater after the organoclay and GAC filters (i.e., filter effluent).
  - c. Wastewater in the sedimentation/separation tank.
  - d. Wastewater in the holding pond.
  - e. WWTP effluent discharged to the seepage beds.
2. Prepare and submit a report that includes:
  - a. Full analytical laboratory reports from the above PFAS sampling.
  - b. A summary of the operational and treatment procedures at the Site, including submitting a list of all the chemicals/products used or stored at the Site that contain PFAS and may enter the waste stream based on a review of Safety Data Sheets.
  - c. A current narrative description and process flow diagram for the WWTP.
    - i. Please include an explanation for why GAC filters are needed in the treatment train and how often the GAC filters are changed out.

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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](https://www.michigan.gov/pfasresponse/0,9038,7-365-88059_95747---,00.html)). PFAS sampling guidance for wastewater can be found on the Michigan PFAS Action Response Team Web site ([https://www.michigan.gov/pfasresponse/0,9038,7-365-88059\\_91297---,00.html](https://www.michigan.gov/pfasresponse/0,9038,7-365-88059_91297---,00.html)).

EGLE encourages the Michigan Department of Military and Veteran Affairs (MDMVA) to become familiar with Part 201 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 and the Part 22 Rules. The explanations of Part 201 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](http://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-gwp-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-003462 does not relieve the MDMVA of any liability, past or present, from failing to meet the conditions specified in, or failing to comply with, Groundwater Discharge Permit No. GW1810156, Part 201, and the Part 22 Rules.

We appreciate your cooperation in addressing this matter. Should the MDMVA require further information regarding this Complication Communication or the MDMVA would like to arrange a meeting to discuss this communication, please contact Mr. Matthew Pfister, Emerging Pollutants Section, WRD, at 517-667-1073; [PfisterM@michigan.gov](mailto:PfisterM@michigan.gov); or EGLE, WRD, P.O. Box 30473, Lansing, Michigan 48909-7973

Sincerely,



Stephanie Kammer, Manager  
Emerging Pollutants Section  
Water Resources Division  
517-897-1597

cc: Mr. Jonathon, Edgerly, MDMVA (electronic)  
Ms. Amy Handley, MDMVA (electronic)  
Ms. Patricia Lyman, MDMVA (electronic)  
Mr. Jon Russell, EGLE  
Mr. Mathew Pfister, EGLE  
Ms. Sydney Ruhala, EGLE  
Ms. Kristine Rendon, EGLE  
Mr. Justin Pung, EGLE  
Mr. Dave Walters, EGLE  
Mr. Brian Jankowski, EGLE

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Mr. Randy Rothe, EGLE  
Mr. Christiaan Bon, EGLE