

Meeting Minutes
Wurtsmith BCT Meeting
24 June 2020
Teleconference

Bay West Project No. J150073
Location: Teleconference

Meeting Date: Wednesday, 24 June 2020
Meeting Time: 0900-0945 EST

MEETING ATTENDEES VIA TELECONFERENCE:

Dave Gibson	AFCEC	Lee Major	Cherokee Nation
Mark Weegar	Cherokee Nation	Andrea Keatley	MDHHS
Jeremiah Morse	AECOM	Puneet Vij	MDHHS
Paul Walz	Bay West	Dale Corsi	DLZ
Andrea Stawowy	Bay West	Ryan Morrish	Bay West
Matt Siler	EGLE- WRD – Bay City	Dirk Pohlmann	Bay West
Charlie Bauer	EGLE- WRD – Bay City	Saamih Bashir	Wood
Mike Neller	EGLE- RRD – RRD Director, Lansing	Paula Bond	Aerostar
John Bradley	EGLE-RRD – Superfund Section, Lansing	Ann Person	EGLE – RRD - Lansing
Beth Place	EGLE-RRD – Superfund Section, Lansing	Amanda Armbruster	EGLE- RRD – Bay City
Matt Baltusis	EGLE-RRD – Superfund Section, Lansing		
Brad Ermisch	EGLE-RRD – Superfund Section, Lansing		
Dan Yordanich	EGLE-RRD – Compliance/Enforcement, Lansing		
David Kline	EGLE – RRD – Superfund Section Manager, Lansing		

The meeting was held via Skype. The meeting began at 0900 hours on 24 June 2020 and adjourned at 1045 hours. The meeting agenda is attached and posted to the Bay West Collaborative Website.

1. Opening Remarks

D. Gibson opened the meeting with a greeting and introductions. The meeting purpose was to discuss environmental restoration program work at the former Wurtsmith AFB. Per D. Gibson a screen shot was taken of the meeting participants which included the phone numbers, to provide an accurate record of who attended.

2. Previous 27 May 2020 BCT Review

- a. The 27 May 2020 BCT Meeting Minutes are still under review by EGLE, they will submit comments, later today. (Note: EGLE provided comments on 30 June 2020, the minutes were posted as final on the Bay West Collaborative Website the same day. A copy was placed in the Oscoda Township Library.)
- b. Action Items – EGLE
 - i. Review Wurtsmith UFP-QAPP and propose metrics that will be used for data quality assessment should QA/QC samples be collected by EGLE, including reconciliation if the agreed upon metrics are not achieved.
 1. B. Place agreed to review the QAPP and the split sampling language. B. Place will draft a split sampling procedure for Air Force review and comment. The task is not to revise the QAPP. This task is in progress and should remain on the agenda.
 - ii. Draft the CTS and MPTS Interim sampling plan or revised SRD.
 1. T. Buckmaster is the lead on this task and he did not attend the call. C. Bauer informed the group that the revised sampling plan should be finished in a few weeks. It was noted that this will not be an updated SRD.

- iii. Submit EGLE PFAS data to the Air Force.
 - 1. The Air Force has requested that the data not be sent until the RI contractor is on board.

3. DOCUMENT SUBMISSION SCHEDULE AND STATUS

Only documents that have changed status since the previous BCT were discussed.

- a. Draft 2017 LTM Annual Report (Bay West)
 - i. RTCs to EGLE comments have been approved by Air Force, Bay West will submit to EGLE and finalize the report.
 - ii. B. Place asked if the RTCs would be sent via email or viewed on the Box.com site. D. Gibson stated the final RTCs will be emailed and the Final report posted on the collaborative website. B. Place commented that normally EGLE reviews the RTCs, then the report goes final. Depending on the document and EGLE comments/Air Force RTCs, review of a RLSO may also occur. B. Place would like to get a procedure established for this process. M. Weegar stated that there were minor edits made to the report and asked if a redline strikeout was necessary or only the RTCs. B. Place agreed that for the Annual Reports, since the comments were minor, only the RTCs are needed for review. Air Force and EGLE agreed to a two-week RTC review for the 2017 LTM Annual Report. {NOTE: The RTCs were subsequently submitted to, and approved by, EGLE. The Final 2017 LTM Annual Report was posted to the Collaborative Website on 6 July 2020.}
- b. Draft 2018 LTM Annual Report (Bay West)
 - i. Same discussion as item a, including the posting of the Final Report to the Collaborative Website on 6 July 2020.
- c. Draft 2018 PTS Annual Report (Bay West)
 - i. Submitted for Air Force review 18 March 2020.
- d. Draft Final SS-57 ESD (Bay West)
 - i. EGLE concurred on 5 May 2020. Bay West will prepare a Draft Public Notice for Air Force review.
 - ii. M. Weegar explained that after the revisions are completed, and the ESD has been signed and placed on the AR and IR, the Public Notice will be placed in the newspaper to notify the public of the ESD and that it is available for review. There is no public comment period associated with an ESD, just the Public Notice.
- e. Draft SS-57 RA-C Report (Bay West)
 - i. Will be posted next week on the Box.com site for EGLE review.
 - ii. Bay West created a new account with the Box.com. Bay West will need a list of individuals at EGLE, along with email addresses, who will review the documents. Each EGLE representative will need to open a box.com account to access the reports. Setting up an account to receive/review documents is free. {NOTE: EGLE subsequently provided the requested list and the SS-57 RA-C report was posted to the Box.com site on 08 July with notices submitted to individuals on EGLE's list.}
- f. Draft SS-17 Site Closure Technical Memorandum (Bay West)
 - i. Site SS-17 Site Closure Memorandum will be submitted for Air Force final review.
- g. Draft SS-72 Proposed Plan (Bay West)
 - i. This document will be left on the agenda until a modification is processed which descopes this work from Bay West's contract.

- ii. B. Place stated this was the first she has heard of the Proposed Plan being descoped. D. Gibson explained that when Air Force Legal reviewed the Draft Proposed Plan, they noted the risk assessment included in the RI was incomplete, as it did not include the hypothetical use of groundwater by a future resident. Air Force legal has determined the risk assessment must be updated to include this potential exposure scenario and that a revised feasibility study (FS) is required as well. Both the updated risk assessment and revised FS will be added to Bay West's contract via a contract modification. Given the time required to execute a modification and prepare the updated risk assessment and revised FS, there is insufficient time in Bay West's Contract to complete a Proposed Plan, ROD, and remedy implementation. These activities will be implemented under a future contract, most likely as part of the follow-on performance-based remediation contract.
- h. Five-Year Review (Bay West)
 - i. Document currently under Air Force review.
 - ii. D. Gibson stated the Air Force hopes the review will be completed in July 2020. After the Air Force review the document will be available for EGLE review for 45 days, via Box.com.
- i. VIAP Work Plan (Bay West / Wood)
 - i. Will be submitted as final today.
 - ii. B. Place stated that EGLE has not seen any RTCs. D. Gibson explained a copy of the email exchange between EGLE's set of comments and the Air Force stating the comments were not substantive would be included in the Final VIAP WP. (Note: As of 8 July 2020 RTCs will be prepared and submitted to EGLE.)
- j. The Final ESI Report (Wood)
 - i. Final ESI Amendment was submitted on 28 April 2020, EGLE comments and Air Force responses have also been posted. This item will be removed from the agenda.
- k. 2019 Annual Reports (Bay West)
 - i. LTM Annual Report is scheduled to be submitted to the Air Force in July 2020.
 - ii. Systems Annual Report is scheduled to be submitted to the Air Force in July 2020.
 - iii. PTS Annual Report is scheduled to be submitted to the Air Force in August 2020.

4. FIELD WORK UPDATE AND SCHEDULE

Bay West

- a. FT-02 Carbon Change out
 - i. The 20th GAC change out took place on 12 June 2020, 99 operational days since the last change out.
- b. SS-57 RAWP Implementation
 - i. The second injection was started on 23 June and is scheduled to be completed on 24 June 2020.
- c. FT-02 RAWP Implementation
 - i. Bay West is working with the Air Force on a contract modification which will be awarded in the next few weeks that will include removal of the concrete pad and transportation and disposal off-site. Once contract mod is awarded, Bay West will implement the FT-02 VOC source area RAWP. The goal is to complete the field work this calendar year.
- d. Engineered Wetlands Treatment System (EWTS)
 - i. Due to seasonal fluctuations the manganese exceeded the discharge criteria in May 2020. There were also manganese and iron exceedances in 2015, 2018 and 2019. In the summer

the warm temperatures cause the ponds to go anaerobic which results in the dissolution of iron and manganese previously removed by the EWTS.

- ii. Bay West is scheduling maintenance for the end of July, the purge wells and EWTS system will be shut down. Maintenance will be performed in Ponds 2, 3, and 4. B. Place asked if July is the best time to perform the maintenance, will it cause an additional increase in iron and manganese levels? P. Walz responded that it is the best time for maintenance as treatment objectives are the most difficult to meet during the summer months.
- e. Annual LTM groundwater monitoring
 - i. The RA-O LTM Annual sampling began in May 2020. Bay West will follow the approved 2019 Sampling Plan. Sites completed and remaining are listed on the agenda.
 - ii. B. Place asked about the timeframe for the FT-02 Annual RA-O event. A. Stawowy explained that the next sampling event will be a combined RA-O and baseline sampling event associated with RAWP implementation. After the modification is awarded, which is expected soon, the sampling will be scheduled. The goal is to sample in August/September 2020, Bay West will provide sampling dates to EGLE when the event is scheduled.

Bay West/Wood

- f. VIAP Update
 - i. S. Bashir stated Q1 field work was completed in May 2020. All soil gas sampling locations were installed and samples collected. The final results are being validated and the Air Force should have the data tables by the end of July 2020. B. Place asked if the Air Force would provide the data to EGLE. D. Gibson said yes, the tables will be provided. S. Bashir clarified that Quarterly data tables and maps of sampling locations will be provided. After the last quarter of sampling all the data will be summarized in one report.

Aerostar

- g. Central Treatment System (CTS) Status
 - i. P. Bond stated the CTS is operating as designed, effluent results have not exceeded the SRD discharge criteria for PFOS and PFOA. The system has treated 210 million gallons of water, it is backwashed weekly, and the run time is 95%. There have been no changes made to the sampling or system.
- h. Mission Pump and Treatment System (MPTS) Status
 - i. P. Bond assumed the resin change out was discussed during last month's BCT, but D. Gibson stated that it was part of the MPTS shake down process and was not discussed. B. Place was interested to know why the resin was exchanged. D. Gibson explained that the biomass is different than at FT-02 and CTS. Bag filters and UV lights have been installed to eliminate the bacterial growth. To date, there have been no exceedances to the PFOS/PFOA discharge criteria. D. Gibson stated more information will be prepared for the next BCT. C. Bauer commented that all this information is useful and interesting to EGLE, not only for this system but for future systems throughout the state. P. Bond stated the system is operating as designed and has treated 46 million gallons, is operating at 188 gpm, and has an uptime of 95%. Optimization efforts are ongoing to deal with the bacteria. M. Weegar stated the biomass is not unique to Wurtsmith, it is an issue at many treatment systems. If the system were GAC, the issue would still exist. Resin does last longer between change out events. B. Place asked if all wells were meeting the designed flow rates, P. Bond confirmed they are. C. Bauer said EGLE would be interested in lessons learned from the system. B. Place asked if the purge well flowrates were only reported in the Annual Reports? A. Stawowy stated that

purge well uptimes, flow rates, and maintenance events are reported in the Monthly Technical Status Reports, which are posted monthly on the Bay West Collaborative website.

5. AIR FORCE UPDATES

- a. Central Treatment System (CTS) Status (Aerostar)
 - i. Discussed in Field Work section 4.g
- b. Mission Pump and Treatment System (MPTS) Status (Aerostar)
 - i. Discussed in Field Work section 4.h
- c. LF-30/31 FS Status (FPM)
 - i. FPM is the contractor that completed the 30% Design and FS. This project is “in the books” for the design to be completed next year.
- d. OWAA 10 parcels
 - i. D. Gibson stated that the Air Force is working on the transfer of the 10 parcels to OWAA. The team is in place and once a current plan is established it will be shared. B. Place asked if EGLE would be reviewing the updated deed and restrictions prior to OWAA review. D. Gibson commented that he was unsure of the review process for these documents. The Air Force is drafting the deed which will include the land use controls included in the associated RODs B. Ermisch stated that EGLE does need to be involved because EGLE may require additional restrictions on the property after the property has been transferred from the Air Force to OWAA. EGLE will receive the draft before it goes final.
- e. MPTS EE/CA and Action Memorandum
 - i. The document is in Air Force review, the RTCs and the redline strikeout version have been received.
 - ii. B. Place asked when EGLE will review the document. M. Weegar stated that once it is finalized it will be placed on the Administrative Record, a Public Notice will be posted for a 30-day comment period. EGLE will provide their comments during the 30-day comment period.
 - iii. B. Place asked about how the Air Force would address EGLE comments on ARARs if there were any? M. Weegar reminded the BCT that PFOS/PFOA treatment was a requirement of the SRD, and the SRD contains PFOS/PFOA discharge criteria. As such, the only ARARs are the SRD discharge criteria.
- f. Tentative schedule for the PFOS/PFOA RI, with milestones, and
- g. RAB Update
 - i. Both topics were discussed together. The RAB is scheduled for 22 July 2020 from 1700-1900 EST. RAB members have been provided with a draft agenda. The PFAS RI is included in the presentation with general timelines. After the contract is awarded the contractor will provide schedule details, which will be discussed at the October 2020 RAB. B. Place asked if there would be any surprises? D. Gibson stated that an RI will be completed with two interim actions, but no other information has been provided. The contractor will provide details of where the new purge wells will be located. D. Gibson stated that the purge well fields will be expanded at CTS and FT-02, and the CSM will be updated. Proper documentation will be expedited so quick reviews are completed and the work executed. B. Place asked what title the work was being completed under: non-time critical, time critical or interim action? D. Gibson said he didn't want to put a label on it, it will be set up in the most efficient manner. M. Weegar stated the press release classified the work as interim remedial actions, which would likely require a Proposed Plan and ROD. B. Place asked about the timing of the

contract. D. Gibson replied the contract goal is to be awarded by the end of July 2020, and they are on track. M. Weegar commented that AFCEC is awarding RI contracts for five bases BRAC nationwide and is pushing the five RIs through contracting all at the same time.

6. EGLE RRD – SUPERFUND SECTION UPDATES

a. RAB

- i. B. Place stated that EGLE RRD will not be providing a Technical presentation.
- ii. B. Place informed the group about an MPart research study that collected foam samples from various lakes in the area. Van Etten Lake results were similar to the past and were elevated. MDHHS and DHD2 will be issuing a press release on the study.

7. EGLE RRD – BAY CITY DISTRICT UPDATES

a. Kings Corner Road Dump – Known PFAS contamination site off Base.

- i. A. Armbruster informed the group the Township may potentially be performing a limited investigation in the area.
- ii. D. Gibson asked that a synopsis be added to the agenda to explain the significance of the Kings Corner Road Dump. The Dump is a site of known PFAS contamination and also has low level VOC contamination. In the past, some parties believed the Air Force contributed to the PFAS contamination, but there is no evidence supporting this perspective.

b. Oscoda area sampling – Other areas where PFAS is being sampled off Base.

- i. A. Armbruster stated quarterly sampling results have been received and there are no exceedances in the 29 samples collected for PFOS + PFOA. There were 10 samples that had elevated PFOA or PFOS levels that were above the proposed MCLs, that have not been passed yet.
- ii. M. Weegar asked if B. Place shared the Oscoda Township initial WWTP and sewer sampling report with A. Armbruster? M. Weegar recalls the manhole sampling results in the sanitary system suggest the AuSable sanitary sewer is leaking. Were any of the monitoring well detections associated with sewer leaks? C. Bauer stated that Oscoda WWTP has a groundwater permit and if any system was discharging PFAS, they are now required to perform routine sampling. M. Siler stated that all sources are being investigated. AuSable Township does not have a WWTP, they have a line connecting to the Oscoda system. M. Siler also stated that there were no significant levels observed, no sewer lines were leaking with sanitary sewage going out, normally groundwater enters the lines. M. Weegar noted that according to the Township's report, the portion of the sewer on former Wurtsmith was above the water table, so groundwater would not enter the sewer line. M. Weegar asked whether that was the same situation in the AuSable area. A. Armbruster confirmed that she received the Oscoda Township report. Smith Street has the elevated levels, and the sewer line in AuSable is to the east of the elevated levels. All potential sources are being evaluated. C. Bauer commented the report is still draft and the study is ongoing. M. Siler stated EGLE has requested Oscoda Township to collect additional samples before the end of June 2020. Upon completion of the report, the next steps will be discussed.
- iii. D. Gibson asked the significance of the AuSable Township sampling, which has since been changed to Oscoda area sampling. There were numerous locations (i.e., approximately 30) off base (e.g., Loud Drive, Colbath Rd, and Oscoda High School), that have been investigated for PFAS contamination. It was originally thought by some parties that the Air Force contributed to some of the contamination, but here is no data which supports this theory.

B. Place explained that during the RI EGLE hopes the full extent of the contamination is identified. The RRD Bay City District has the lead on the off Base investigations, and RRD Lansing has the lead for any contamination on Base.

8. EGLE WRD – UPDATES

- a. SRD Update: Process to issue “replacement” SRD for CTS and MPTS
 - i. T. Buckmaster is the lead and he was not on the call. Topic was discussed in the Action Items section ii.
- b. Other – Surface water/fish sampling in area
 - i. Joe Bohr was heading up the surface water and fish sampling, but he is retiring. B. Place shared a table of data from the recent surface water and fish sampling event, it was different than the data that was provided in the body of an email that was provided to the Air Force

9. MDHHS UPDATES

- a. Residential Well sampling update
 - i. P. Vij, took over for A. Mussa and stated that residential well sampling resumed in the first week of June, as it was on hold since mid-March. MDHHS and EGLE are working together on the foam issue. There is a specific advisory stating to rinse off the water in Van Etten Lake due to the elevated levels.

10. Next Meetings:

- a. RAB – 22 July 2020 1700 – 1900 EST
- b. BCT – 29 July 2020 0900 – 1100 EST
- c. BCT – 26 August 2020 0900 – 1100 EST

11. ACTION ITEMS:

- a. EGLE
 - i. B. Place will review the Wurtsmith UFP-QAPP and propose metrics for assessing data quality for split samples and corrective actions if metrics are not met.
 - ii. Draft CTS and MPTS Interim sampling plan or revised SRD

24 June 2020

BCT Teleconference – Agenda

Wurtsmith AFB, Oscoda, MI

1. Air Force Opening Remarks/General Business Discussion

2. Previous BCT Meeting – 27 May 2020

- a. Meeting Minutes – comments/approval
- b. Action Items - EGLE
 - i. Review Wurtsmith UFP-QAPP and propose metrics for assessing data quality for split samples and corrective actions if metrics are not met.
 - ii. Draft CTS and MPTS Interim sampling plan or revised SRD.
 - iii. Submit EGLE PFAS data to Air Force – Will occur once Air Force Contractor is on board.

3. Document Submission Schedule and Status

Document (Contractor)	Date submitted to EGLE	EGLE Review Status	Comments
Draft 2017 LTM AR (Bay West)	11-21-18	Comments Rec'd 3/25/20	RTCs under Air Force Review
Draft 2018 LTM AR (Bay West)	4-4-19	Comments Rec'd 3/25/20	RTCs under Air Force Review
Draft 2018 PTS AR (Bay West)			Submitted to Air Force on 3/18/20
Draft Final SS-57 ESD (Bay West)	1-9-20		Received EGLE Concurrence on 05 May. Preparing Public Notice regarding document availability.
Draft SS-57 RA-C Report (Bay West)			Draft approved by Air Force. Will be posted on Bay West's box.com account for EGLE review.
Draft SS-17 Site Closure Tech Memo. (Bay West)			Will be posted on Bay West's boc.com account for EGLE review after Final VIAP Work Plan is submitted
Draft SS-72 Proposed Plan (Bay West)			Under Air Force review
Draft Five-Year Review (Bay West)			Submitted to Air Force on 3/23/20
VIAP Work Plan (Bay West / Wood)			Final VIAP Work Plan to be submitted to EGLE
Final ESI Report (Wood)			Response to comments in Air Force Legal review.
Draft 2019 LTM AR (Bay West)			Scheduled for submittal to Air Force in June 2020.
Draft 2019 Systems AR (Bay West)			Scheduled for submittal to Air Force in July 2020.
Draft 2019 PTS AR (Bay West)			Scheduled for submittal to Air Force in August 2020.

4. Field Work Update and Schedule

- a. FT-02 Carbon change out event was completed on 12 June 2020, approximately 99 operational days since the last change out.
- b. SS-57 RAWP Implementation – The second injection is schedule to start on 22 June 2020 and should be completed by 26 June 2020.

- c. FT-02 RAWP Implementation – Air Force modification for the transportation and disposal of the concrete pad after it has been demolished is in process.
- d. Engineered Wetlands Treatment System (EWTS) -
 - Seasonal (i.e., summer month) manganese concentration exceedance was detected in May.
 - Both iron and manganese concentrations have the potential for concentration exceedances during the summer.
 - Manganese and/or iron concentration exceedances also occurred in 2015, 2018 and 2019.
 - EWTS will be turned off in July 2020 for maintenance work in Ponds 2, 3, and 4.
 - Scope of work is to fill rodent holes in Pond 2 berm, tree removal, and clean influent and effluent laterals in Ponds 3 and 4.
- e. Annual LTM groundwater monitoring begin in May 2020. The previously approved 2019 Sampling Plan is being followed. 2020 IRP sites completed: LF-27, LF-30/31, OT-24, SS-05, SS-06, SS-08, SS-21, SS-72, SS-71, and WP-04. 2020 remaining sites: FT-02, OT-16 and SS-57
- f. VIAP Update – Q1 field work started 4 May 2020 and was completed on 28 May 2020. 17 soil gas borings were installed and sampled. 25 vapor pins were installed in Building 5306 and sampled. Q2 sampling event is scheduled to start on 24 August 2020.

5. Air Force Updates

- a. Central GAC Treatment System (CTS) Status
- b. Mission Pump and Treat System (MPTS) Status
- c. LF-30/31 FFS status update on RTCs for LNAPL FFS and the LF-30/31 30% Drainage Design.
- d. OWA 10 parcels
- e. Mission Street EE/CA and Action Memorandum.
- f. Tentative schedule for the PFAS RI, with milestones.
- g. RAB Update

6. EGLE RRD - Superfund Section Updates

- a. Other – RAB topics

7. EGLE RRD - Bay City District Updates

- a. Kings Corner Road Dump
- b. Au Sable Township

8. EGLE WRD Updates

- a. SRD Update: Process to issue “replacement” SRD for CTS and MPTS.
- b. Other – Surface water/fish sampling in area
- c. Oscoda Township Wastewater Treatment Plant Update: status of additional PFOS/PFOA sampling; actions related to PFOS/PFOA discharges to groundwater

9. MDHHS Updates

- a. Residential Well sampling update

10. Schedule Next BCT Meeting

- a. 29 July 2020 teleconference 0900-1100 EST