

Meeting Minutes
Wurtsmith BCT Meeting
27 January 2021
Teleconference

Bay West Project No. J150073
Location: Teleconference

Meeting Date: Wednesday, 27 January 2021
Meeting Time: 0900-1005 EST

MEETING ATTENDEES VIA TELECONFERENCE:

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

The meeting was held via Microsoft Teams. The meeting began at 0900 hours EST on 27 January 2021 and adjourned at 1005 EST hours. The meeting agenda is attached and posted to the Bay West Collaborative Website.

1. Opening Remarks

P. Walz opened the meeting with a greeting and introductions. The meeting purpose was to discuss environmental restoration program work at the former Wurtsmith AFB.

2. Previous 16 December 2020 BCT Review

- a. 16 December 2020 meeting minutes were finalized on 11 January 2021, the hard copy will be placed in the Wurtsmith IR once the Oscoda Library reopens. The electronic version was posted to the Bay West Collaborative Website.
- 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 data quality metrics are not achieved. Status (summarized below) is unchanged from last month’s BCT meeting. Action Item will remain on next month’s Agenda.
 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.
 2. B. Place stated the split sampling language would be updated closer to the commencement of PFAS RI field work.
 - ii. Provide USFS Access Agreement information – B. Place provided via email on 16 December 2020.
 - iii. Follow up on remaining 5 PFAS MCLs. – B. Place stated the topic has been discussed internally and they are waiting final response from management and the Attorney General.

- iv. Addition to the Action items section – Updates on the sampling changes for the SRD at CTS, MPTS and FT002. Currently under EGLE review. C. Bauer stated there is no update at this time, an update will be provided during next month’s BCT meeting.
- c. Air Force
 - i. Provide previous Wurtsmith slide show to EGLE for use at Tribal Meeting – the meeting already took place, and the slides are no longer needed.

3. DOCUMENT SUBMISSION SCHEDULE AND STATUS

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

Bay West

- a. Draft SS072 Proposed Plan – Air Force is working on a modification to complete an updated Risk Assessment and updated Feasibility Study. Work execution on hold, pending Modification award.
- b. Draft Five – Year Review – M. Weegar commented that at the previous RAB, held on 20 January 2021, there appeared to be a misperception by some RAB members regarding what the Fourth Five Year Review will contain. It appears that some RAB members believe the document will include a detailed discussion of PFAS in the Five-Year Review as it relates to the Protectiveness Determination associated with each IRP site. As the intent of the Five-Year Review is to evaluate remedy protectiveness with respect to COCs identified in applicable Decision Documents, not the protectiveness of emerging contaminants which are at an earlier stage in the CERCLA process and for which no Decision Document exists. Consequently, the Five-Year Review PFAS discussion will be limited. As a Team, this misperception may need to be addressed in upcoming meetings.

B. Place agreed that this may be the expectation and asked if the Air Force planned to include a Deferred Protectiveness Statement to include Vapor Intrusion and PFAS compounds. M. Weegar stated he was not sure at this time. C. Varley commented that the Air Force lawyers will compare Wurtsmith to previously completed Five Year Reviews from other installations. D. Kline stated that traditionally Five-Year Reviews will state when new chemicals of concern are found and make recommendations to address the contaminants as appropriate. Wurtsmith is a unique case, the PFAS compounds and VI concerns have been identified and they are currently being investigated. A reasonable approach would be to acknowledge PFAS has been identified on base, that a RI has been initiated, and recommend that work continue in accordance with the CERCLA process, based on RI results. VI can be addressed in a similar manner. M. Weegar noted that EPA issued a memorandum dated 12 September 2012 which speaks to protectiveness determinations, and addresses issues related to new exposure pathways such as VI and emerging contaminants. B. Place asked if the EGLE timeframe to receive the Five-Year Review was still February 2021. M. Weegar replied no, after his review it will go back to Bay West for revisions, then to the Air Force Legal team, so a more realistic timeframe would be April 2021.
- c. FT002 RAWP Addendum EGLE RTCs are under Air Force review, they were sent this am. The UST Removal Work Plan RTC Air Force comments are being drafted by Bay West and should be completed in a few days.

Bay West / Wood

- a. SS008 and WP004 Draft Final Work Plans
 - i. EGLE submitted comments on 28 October 2020, there were no comments on the SS008 UFP-QAPP RA-O WP/FSP, it will be submitted Final. Revised RTCs for the WP004 UFP-QAPP RA-O

WP/FSP were submitted 17 November 2020. EGLE had a conversation with S. Bashir, they need more information on why one monitoring well will not be replaced. To speed up the process S. Bashir will add the information that was discussed on the phone call to the RTCs, submit to the Air Force for its review, then to EGLE upon Air Force approval.

Aerostar

- a. Note all dates for document submittals stated on the Agenda are projected dates.
- b. Van Etten Lake Proposed Plan is under Air Force legal review.
- c. Clark's Marsh Proposed Plan was submitted to EGLE on 14 December 2020, comments have been received and Air Force is reviewing responses.
- d. B. Place asked if the Proposed Plans included public comment period and public meetings. P. Bond stated that the Proposed Plans do include a 30-day public comment period and if there is enough public interest a public meeting will be held. Currently, due to COVID, the Oscoda Library is closed, where all the hard copy IR documents are located. That will not impact the public review period as the documents will be placed on the AFCEC on-line at the AR. It is assumed that there will be public interest and public meetings will be held.
- e. B. Place also stated it would be helpful to know the order of the sites that will be discussed during the PFAS RI QAPP meeting. P. Bond will provide them.

FPM

- a. Final LF030/031 FS was finalized in December 2020 and item will be removed from the agenda.

To Be Submitted

- a. Draft 2019 PTS Annual Report will be submitted to Aerostar in January 2021, then to Air Force for review.
- b. Draft 2019 LUC Report will be submitted to the Air Force for review later this week.
- c. VIAP Q3 results were submitted to the Air Force on 25 January 2021 for review.

4. FIELD WORK UPDATE AND SCHEDULE

Bay West

- a. FT002 Carbon Change out
 - i. The 22nd GAC changeout took place on 14 January 2021, the system operated 106 days between changeouts, all effluent sampling results remained below criteria.
- b. SS057 RAWP Implementation
 - i. The semi-annual sampling event is scheduled for April 2021, after results are received, validated, and evaluated, the fourth injection will be scheduled.
- c. FT002 RAWP Implementation
 - i. Field work is tentatively scheduled to begin 19 April 2021. Work will include UST removal and RAWP construction.
- d. Annual LTM groundwater monitoring
 - i. 2020 sampling data and water levels are being used to develop the base-wide groundwater plume maps.
- e. 2021 RA-O groundwater monitoring and annual base-wide gauging event will be completed by the follow-on Contractor.
- f. Bay West will perform the SS057 semi-annual April sampling event; sampling related to FT002 RAWP construction of the IAB remedy and UST removal, including baseline sampling; and treatment system sampling through 26 June 2021 at FT002 and LF030/31.

Bay West/Wood

- g. VIAP Update
 - i. S. Bashir stated Q4 sampling event is scheduled for the week of 15 February 2021; OWAA, Kalitta and EGLE have all been notified.

Aerostar

- h. Central Treatment System (CTS) Status
 - i. P. Bond stated the CTS is operating as designed, regular sampling confirms SRD requirements are being met.
 - ii. A sample of GAC was collected from the SAC vessel for waste profiling to perform a GAC change out. Both the SAC and Lead vessels will be changed, and work is scheduled to start next week.
- i. Mission Pump and Treatment System (MPTS) Status
 - i. P. Bond stated the MPTS is operating as designed, regular sampling confirms SRD requirements are being met.
- j. PFAS Remedial Investigation Status
 - i. UFP-QAPP is in Air Force review.
 - ii. The Clark's Marsh Proposed Plan was submitted to EGLE and the Van Etten Lake Proposed Plan is under Air Force legal review.
 - iii. The Van Etten Lake 90% remedial design is being revised to incorporate USAF comments on the 60% remedial design package.
 - iv. The Clark's Marsh 60% design is under USAF review.
 - v. A Remedial Action Work Plan is in development which will include packages for each IRA that EGLE will review.
 - vi. The next scoping meeting was held on 25 January 2021, and a follow-on meeting is scheduled for 29 January 2021.
 - vii. B. Place asked if the old extraction wells for MPTS and CTS were operating at target flow rates. P. Walz stated that the Arrow Street and Mission Street wells typically operate at or near target flow rates, but Benzene wells have been operating below target.

5. AIR FORCE UPDATES

- a. OWAA 10 parcels
 - i. The OWAA 10 parcels are still under Air Force review with no new developments since last BCT meeting comment.
 - ii. Note the OWAA 10 Parcels and Hanger 10 proposed well abandonment are two separate issues. Air Force legal is reviewing the Hanger 10 Well Abandonment along with EGLE. Kalitta Air plans to build another Hanger and OWAA is requesting the Air Force SS008 monitoring wells in the footprint of the proposed new hanger be abandoned.
- b. RAB Update
 - i. The RAB took place on 20 January 2021, virtually. D. Medina stated the Air Force is working through the list of action items and looking at the comments. The PFAS CSM and PFAS RI are both making progress and the Air Force will continue to work with the RAB and EGLE on Interim Actions. The CERCLA process is being followed. The date for the next RAB has not been set, it is the Air Force's intention to keep the RAB and PFAS RI Public Meetings separate.
- c. Oscoda Township Stormwater discharge fee
 - i. The discharge fee is still under Air Force legal review. D. Medina stated there have been discussions with the Air Force legal team regarding the storm water discharge fee and what authority the Air Force has to pay the fees. The review of the stormwater fees is a much

bigger issue than Wurtsmith. C. Bauer asked for clarification of the ‘authority to pay.’ The storm sewer is a utility the Township owns, and if the Air Force owned it, they would maintain it. D. Medina again stated the issue under review is fiscal in nature; however, they are looking at the Feasibility Study for alternative discharges options to be considered.

- d. Air Force submitted a response to the revised SRD sampling plans for CTS, MPTS and FT002 on 3 December 2020. Topic discussed during Action Items.

6. EGLE RRD – SUPERFUND SECTION UPDATES

a. Other – RAB topics

- i. EGLE is also following up on RAB action items. A comment was made at the RAB about high level VOCs under the LF031 landfill cap, after looking at current data B. Place stated that comment was based on historical data. The LF030/031 SRD is being evaluated internally by EGLE and they are determining a path forward.
- ii. A MPART Townhall meeting is tentatively scheduled for 20 April 2021. EGLE would like to be informed of all Air Force meeting dates.
- iii. During the call, M. Baltusis included the EPA Guidance on Protectiveness Statement Clarification (2012), 2014 Update to DoD Manual to Five Year Review Procedure and the MDHHS Safe Fish Link on the Teams Meeting chat feature for the groups use.

EPA Guidance On Protectiveness Statement Clarification (2012):

<https://www.epa.gov/superfund/writing-five-year-reviews-superfund-sites#protect>.

2014 Update to DoD Manual to Five Year Review Procedure:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjH4dzpqbzuAhUOG80KHkDA_sQfjAAegQIAhAC&url=https%3A%2F%2Fdenix.osd.mil%2Fderp%2Fpolicy%2Funassigned%2F5-year-review-june-2-2014%2F&usg=AOvVaw2EIRpPyOsw1zeL2GzuZK0I

MDHHS Safe Fish link: https://www.michigan.gov/mdhhs/0,5885,7-339-71548_54783_54784_54785_58671-296074--,00.html

7. EGLE RRD – BAY CITY DISTRICT UPDATES

- a. Kings Corner Road Dump – no update.
- b. Loud Drive – no update.
- c. Oscoda area sampling – A. Armbruster stated AECOM was currently completing Quarterly sampling at several sites. Also drinking water wells that have not been previously sampled in the AuSable area will be sampled. They are located near a monitoring well that was above criteria for PFAS, and they are not connected to the municipal system.

8. EGLE WRD – UPDATES

- a. Surface water/fish sampling in the area – C. Bauer summarized an email that was sent prior to the BCT from Brandon Armstrong. The mercury and PFAS data from fish samples collected in Van Etten Lake in 2018 and 2019 has been analyzed. Under current guidance yellow perch consumption is limited to 4 meals a month due to mercury levels. The new data shows consumption of yellow perch should be reduced to 2 meals per month based on PFAS results. Any new advisory would come from MDHHS. P. Vij stated that MDHHS didn’t have an update on the fish consumption. The data will be reviewed and if the guidance needs to be updated a new one will be issued.
- b. Oscoda Township Wastewater Treatment Plan (WWTP) update

- i. C. Bauer stated that EGLE did not have an update, the evaluations are ongoing. M. Siler is on leave and will provide an update when he returns.
 - c. C. Varley asked if any groundwater quality parameters such as nitrate and nitrogen had been collected at the WWTP or residential wells to help identify sources.
 - i. C. Bauer said he was not sure he would check with M. Siler, how is on leave EGLE will provide an update upon his return.
 - ii. P. Vij said they were not for the first round of sampling and he will confirm whether or not these will be included for the second round.

9. MDHHS UPDATES

- a. Residential Well sampling update
 - i. P. Vij stated all the resamples have been completed and the results letters were sent to residents the first week of January. The next round of sampling is scheduled for Spring 2021, no date has been set. For the PFAS samples previously collected, Method 537.1 was used, and 24 analytes reported. During the next round of sampling, the same method will be used but 39 analytes will be reported.

10. Next Meetings:

- a. BCT – 17 February 2021, 0900 – 1100 EST - confirmed
- b. BCT – 17 March 2021, 0900 – 1100 EST - confirmed
- c. BCT – 21 April 2021, 0900 – 1100 EST – tentative (final date will be determined once the date of the next RAB is known)

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. Follow up on remaining 5 PFAS MCLs.
 - iii. Status of revised CTS, MTPS, and FT002 SRD.
 - iv. Check whether or not groundwater water quality parameters, such as nitrate and nitrite are being collected as part of the sampling analysis at the WWTP.
- b. MDHHS
 - i. Check if groundwater water quality parameters, such as nitrate and nitrite, will be collected during the next round of residential well sampling.
- c. Aerostar
 - i. Provide EGLE the order of sites to be discussed at the PFAS RI QAPP meeting.