



DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC 20330-1000

OFFICE OF THE ASSISTANT SECRETARY

FROM: SAF/IEE
1665 Air Force Pentagon
Washington DC 20330-1665

SUBJECT: Environmental Restoration at Wurtsmith AFB

Dear Senator Stabenow:

This letter is in reply to your inquiry on behalf of Mr. Mark Henry, Restoration Advisory Board (RAB) member for the former Wurtsmith AFB, who wants greater transparency and coordination by the Department of the Air Force (DAF) with the community regarding the ongoing environmental restoration actions.

Thank you for the opportunity to respond to the concerns Mr. Henry expressed in his January 4, 2021 letter to you. Mr. Henry made several allegations regarding the DAF's environmental restoration of Wurtsmith AFB. His allegations focused on what he characterizes as a lack of transparency and meaningful community involvement in the cleanup process at the former installation. I address his concerns below.

Let me assure you that the Department of the Air Force provides open communications with the RAB concerning environmental restoration actions at Wurtsmith AFB. In doing so, the DAF complies with federal statutes, regulations and guidance. The RAB is comprised of representatives of the public, local governments, state regulatory agency and other stakeholders. This membership includes officials from the AuSable Township, Oscoda Township, Oscoda-Wurtsmith Airport Authority, Michigan Department of Environment, Great Lakes and Energy (EGLE), and the U.S. Forest Service.

The DAF re-established the RAB at Wurtsmith in November 2017 specifically to provide a forum for stakeholders' input on the DAF efforts to assess and remedy past contaminant releases attributable to the DAF. The RAB is an important means of including community members and local officials in the Wurtsmith cleanup process to address past releases of aqueous film forming foam (AFFF) and associated contaminants such as perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA), including the Air Force's efforts to protect drinking water sources.

The cleanup process at Wurtsmith AFB is governed by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the Defense Environmental Restoration Program (DERP), and the National Contingency Plan (NCP). In addition, the Air Force complies with the regulations governing Department of Defense (DoD) restoration advisory boards, which were promulgated in 2006 and are commonly known as "the

RAB Rule.” The RAB rule instructs DoD to issue guidance “regarding the scope, characteristics, composition, funding, establishment, operation, adjournment, and dissolution of RABs.” In compliance with that instruction, in March 2007 DoD issued the “Restoration Advisory Board Rule Handbook” as a supplement to the RAB Rule (<https://denix.osd.mil/rab/home/unassigned/rab-rule-handbook/>). These statutes, regulations and guidance govern DoD’s cleanup of contaminated sites, including DoD interactions with environmental regulators and restoration advisory boards’ members. The DAF adheres to the federal requirements and guidance.

Mr. Henry asserts that 10 U.S.C. § 2705 requires that local officials have a greater role than given at Wurtsmith AFB in reviewing draft documents; DAF is complying with the statute. The statute requires that DoD give state and local officials an opportunity to review and comment on proposals to carry out response actions before DoD undertakes that action. For remedial actions (actions DAF is undertaking to address contamination at Clark’s Marsh and Van Etten Lake), the proposal is presented in a proposed plan. Proposed plans are released for public comment, and comments from the public and RAB are considered prior to a final decision and responded to in the DAF’s decision document.

Mr. Henry would like community and local officials to be at the table with DAF and state regulators when the drafts of DAF actions are discussed. However, the current practice, which is not unique to Wurtsmith AFB, is important because it allows DAF and regulatory representatives to candidly discuss and collaborate on environmental cleanup strategies and pre-decisional draft documents, as well as correct any misunderstandings between the agencies regarding the cleanup. Nonetheless, DAF has provided the RAB and stakeholders copies of the minutes from these meetings. Draft documents shared between DAF and regulators are protected from public release as part of the “deliberative process” allowed under the Freedom of Information Act.

Mr. Henry also says that the Air Force is not discussing its remedial plans with the U.S. Forest Service, which manages the Huron-Manistee National Forests adjacent to Wurtsmith AFB. Clark’s Marsh, one of the areas DAF is remediating, falls within the Huron-Manistee National Forests. The DAF has communicated on multiple occasions with both the district ranger assigned to Huron-Manistee as well as the environmental engineer assigned to oversee environmental technical work at Huron-Manistee. The DAF is soliciting the Forest Service’s inputs on DAF’s investigation and remediation of Clark’s Marsh. In addition, the DAF is coordinating its field efforts with the Forest Service to avoid impacts to forest habitats or Forest Service operations.

Another issue raised by Mr. Henry regards impacts to Van Etten Lake and community concerns that contaminated groundwater might be migrating from Wurtsmith AFB to the eastern side of Van Etten Lake. The RAB was briefed on DAF and U.S. Geological Survey data, and EGGLE’s independent conceptual site model, and all concluded groundwater does not flow under the lake to the east side of the lake. The hydrogeology showed groundwater on the east side flows into Van Etten Lake, which is the opposite direction of what one would see if groundwater flowed under the lake to the east side.

The DAF is committed to working with the RAB on issues related to Wurtsmith AFB's cleanup efforts and will continue to host quarterly RAB meetings. In addition, DAF will also continue providing information through the Air Force administrative record website (<https://ar.afcec-cloud.af.mil/Default.aspx>) and the Information Repository, which is housed in the Oscoda Township library. The DAF has provided opportunities for the community to tour environmental sites and operational treatment systems and will resume tours once COVID-19 conditions are deemed safe by local health authorities.

The Department of the Air Force remains committed to protecting human health and the environment at the former Wurtsmith AFB and we appreciate your continued support.

For more information, please contact Mr. Otis Hicks, Director Environmental Policy & Programs (otis.hicks.1@us.af.mil).

MARK A. CORRELL, P.E.
Deputy Assistant Secretary of the Air Force
(Environment, Safety, and Infrastructure)