



DEPARTMENT OF THE AIR FORCE

WASHINGTON, DC 20330-1000

OFFICE OF THE ASSISTANT SECRETARY

SAF/IEE
1665 Air Force Pentagon
Washington, DC 20330

The Honorable Daniel T. Kildee
United States House of Representatives
203 Cannon House Office Building
Washington, DC 20515

Dear Representative Kildee:

Thank you for your letter dated April 20, 2021 regarding the Department of the Air Force's (DAF's) cleanup efforts at the former Wurtsmith Air Force Base (Wurtsmith). We understand your concerns as well as those voiced by the public during the Clark's Marsh interim remedial action public comment period.

We are considering each public comment that was submitted during the public comment period, which closed April 17, 2021. As required by § 117(b) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. § 9617(b)), the DAF will respond to all significant comments in the record of decision. The record of decision also will discuss any significant changes that might be made to the remedy in response to the public comments. Final decisions have not been made for the Clark's Marsh interim remedial action.

The DAF is discussing with the Michigan Department of Environment, Great Lakes and Energy (EGLE) other potential interim remedial actions beyond those currently proposed for fire training area FT-02 (i.e., the Clark's Marsh interim remedial action) and the Van Etten Lake near the Ratliff Park area. In addition, the DAF is working diligently to fill data gaps needed in order to make informed decisions with respect to future Wurtsmith remedial actions, both interim and final. That work is part of the CERCLA remedial investigation, which began in the summer of 2020. The Clark's Marsh and Van Etten Lake interim remedial actions are not intended to address all contamination flowing into those sites. These interim remedial actions are intended to make significant contributions to intercepting the flow of perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) while the DAF gathers the data it needs to inform long-term remedies that will meet the requirements of CERCLA.

The DAF is sharing data from the ongoing remedial investigation with the Wurtsmith Restoration Advisory Board (RAB). At the April 21, 2021 RAB meeting, the DAF responded to RAB members' earlier requests to see the DAF's conceptual site model for Wurtsmith. The conceptual site model is a dynamic, in-depth depiction of what Air Force and EGLE have determined are the hydrogeological and chemical data relationships with respect to site conditions around Wurtsmith. It is a key component of the CERCLA remedial investigation.

After the presentation, the DAF answered RAB members' technical questions about the conceptual site model.

The DAF will continue to provide updates on cleanup activities as part of the RAB meetings and will also continue distribution of minutes associated with the BRAC Cleanup Team (BCT) meetings held with EGLE. The DAF understands the communities' request for inclusion into the BCT process. However, the Department of Defense practice of limiting BCTs to representatives from the DAF and its federal and state regulatory partners has an important purpose.

This arrangement for BCT meetings, which is not unique to Wurtsmith, 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. The discussions between the DAF and the regulatory officials are pre-decisional in nature and not open to other parties, however EGLE is the public's representative at these meetings and has wide latitude to consider public inputs as they engage with the DAF in these BCT meetings. We encourage community involvement and collaboration in the environmental restoration process at Wurtsmith through participation in the Wurtsmith RAB, where the results of the BCT meetings are discussed. Candid conversations between EGLE as the regulator and the DAF as the regulated agency are critical to producing future cleanup actions.

We realize that the DAF's approach to applicable or relevant and appropriate requirements (ARARs) for the interim remedial actions has confused and troubled the public. As the DAF explained in the Clark's Marsh proposed plan and at the public meeting on that proposed plan, the interim remedial action will expand an existing groundwater treatment system on which EGLE already has imposed discharge limits. This approach conforms with CERCLA § 121(d)(4)(A) (42 U.S.C. § 9621(d)(4)(A)). The DAF stated clearly in the proposed plan that the final remedy will comply with all state criteria that qualify as ARARs under CERCLA § 121(d)(2) (42 U.S.C. § 9621(d)(2)). EGLE approved the proposed plan.

The DAF remains committed to protecting human health and the environment at Wurtsmith, and we appreciate your continued support.

This response has also been sent to Senators Stabenow and Peters, and Representative Slotkin.

Sincerely,

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