

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY



LANSING

February 19, 2021

Mr. Daniel G. Medina, GS-13, DAF Program Manager BRAC Program Management Division Air Force Civil Engineer Center Commercial: 210-395-9419 (DSN 969)

SUBJECT: Request for Per- and Polyfluoroalkyl Substance (PFAS) Inclusion in

the Wurtsmith Air Force Base (WAFB) LF 30/31 Engineered Wetland

Treatment System (EWTS) Performance Monitoring Analytical

Dear Mr. Medina:

As you are aware, the Air Force is conducting a response action under Comprehensive Environmental Response, Compensation, and Liability Act, 1980 PL 96-50 (CERCLA) associated with the Landfill 30/31 EWTS at the WAFB conducted in a manner that is consistent with state laws regarding removal and remedial actions, and as such, the Air Force is required to meet substantive standards of applicable or relevant and appropriate State of Michigan regulations.

The substantive requirements must include a comprehensive characterization and description of the system wastewater characteristics. The substantive requirements document (SRD) currently recognized by the Air Force was prepared prior to the discovery of PFAS as a site contaminant of concern.

We request that the LF 30/31 influent and effluent (treated water discharge) monthly monitoring include the analysis of PFAS compounds identified in the Department of Defense Quality System Manual as part of the regular system monitoring protocol. This data is necessary to ensure the discharge is in compliance with the substantive requirements of Michigan's regulations, and to determine the potential need for modification of the SRD. It is requested that this change to the LF 30/31 monitoring protocol be implemented as soon as possible and be included in the next monitoring event. We also request that the monitoring data gathered be shared with EGLE Remediation and Redevelopment Division on a monthly basis, as it becomes available.

Thank you for your attention to this matter. If you need further information or assistance, please contact me, at 517-512-5017, BradleyJ1@michigan.gov; Supervisor, Geology and Defense Site Management Division, Remediation and Redevelopment Division; or EGLE P.O. Box 30473, Lansing, Michigan 78909.

Sincerely,

John Bradley, Supervisor Geology and Defense Site Management Unit 517-512-5017

cc: Ms. Catherine Varley, Air Force Civil Engineer Center

Mr. Mike Neller, EGLE

Mr. Josh Mosher, EGLE

Mr. Dave Kline, EGLE

Ms. Amanda Armbruster, EGLE

Mr. Charlie Bauer, EGLE

Ms. Ann Person, EGLE

Ms. Beth Place, EGLE