



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING



LIESL EICHLER CLARK
DIRECTOR

March 23, 2021

VIA E-MAIL AND U.S. MAIL

Dr. Stephen G. Termaath, GS-15, DAF
AFCEC/CIBE
Chief, BRAC Program Management Division
Installations Directorate
2261 Hughes Avenue, Suite 155
JBSA Lackland, Texas 78236-9853

Dear Dr. Termaath:

SUBJECT: Interim Action to Remove Per- and Polyfluoroalkyl Substances (PFAS);
Former Wurtsmith Air Force Base; Iosco County, Michigan;
Site ID No. 35000058

The Department of Environment, Great Lakes, and Energy (EGLE) supports and appreciates that the Air Force Civil Engineer Center (Air Force) is currently planning two Interim Remedial Actions (IRAs) to address PFAS contaminated groundwater at the former Wurtsmith Air Force Base. The planned actions include the expansion of the FT002 Pump and Treat System (PTS) upgradient of Clark's Marsh and the expansion of the central treatment system to extend capture to Air Force Beach.

EGLE requests that the Air Force performs an additional IRA between the current FT002 and Mission Street PTSs capture zones (Attached - Proposed IRA2). This is an area that is already well delineated and has PFAS concentrations in groundwater comparable to groundwater concentrations proposed for the Air Force Beach IRA (See Draft Quality Assurance Project Plan – Worksheet 17, Figure 17-16 provided for the January 25, 2021 Data Quality Objectives meeting). This action is requested to specifically capture PFAS contaminated groundwater in Aqueous Film Forming Foam (AFFF) Areas 2, 7, 9, and 14 (CAT605P and FT-002), which is moving south-southeast, off of the former base. This IRA request expands on the Expanded Site Inspection (ESI) report recommendation to extend the Mission Street PTS to capture groundwater with PFAS concentrations of PFOA/PFOS above the Lifetime Health Advisory, Part 201 Drinking Water Criteria, and PFOS above Part 201 Groundwater-Surface Interface criteria from ESI AFFF Areas 2 and 7. ESI AFFF Areas 2 and 7 are located upgradient of potential residential receptors.

This action could include the installation of additional groundwater extraction wells to better control the continued migration of contaminated groundwater while a final remedy is being developed. These extraction wells could be connected to existing groundwater treatment systems or additional treatment systems could be installed. EGLE also

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encourages the use of alternative PFAS treatment technologies shown to be equally effective.

As per the United States Environmental Protection Agency memorandum, *Use of Early Actions at Superfund National Priorities List Sites and Sites with Superfund Alternative Approach Agreements, August 23, 2019*, such early actions are encouraged and can yield significant benefits to achieving long-term cleanup goals. Such actions would serve to limit contaminant migration and may serve to provide risk reduction.

The recommended early actions to limit PFAS migration in the groundwater are consistent with the existing and anticipated future Remedial Action Objectives (RAOs) at the site. The existing RAO typically include restoring the groundwater to industrial or residential drinking water on the base and restoring off base groundwater to residential drinking water criteria. Where significant groundwater contamination exists, the selected remedies have included groundwater PTSs. In the recommended areas for early action, significant exceedances of the residential drinking water criteria and groundwater surface water interface for PFAS exists. It is reasonable to expect that upon completion of the Remedial Investigation/Feasibility Study, that the objectives and remedies for PFAS groundwater contamination will be substantially consistent with the existing groundwater remedies. Therefore, it is expected that early action PTSs will be consistent with the anticipated long-term remedies.

Should you require further information of a technical nature, please contact Ms. Beth Place, Superfund Section, Remediation and Redevelopment Division, at 517-899-7524; PlaceB1@Michigan.gov; or EGLE, P.O. Box 30473, Lansing, Michigan 48909-7973; or you may contact me.

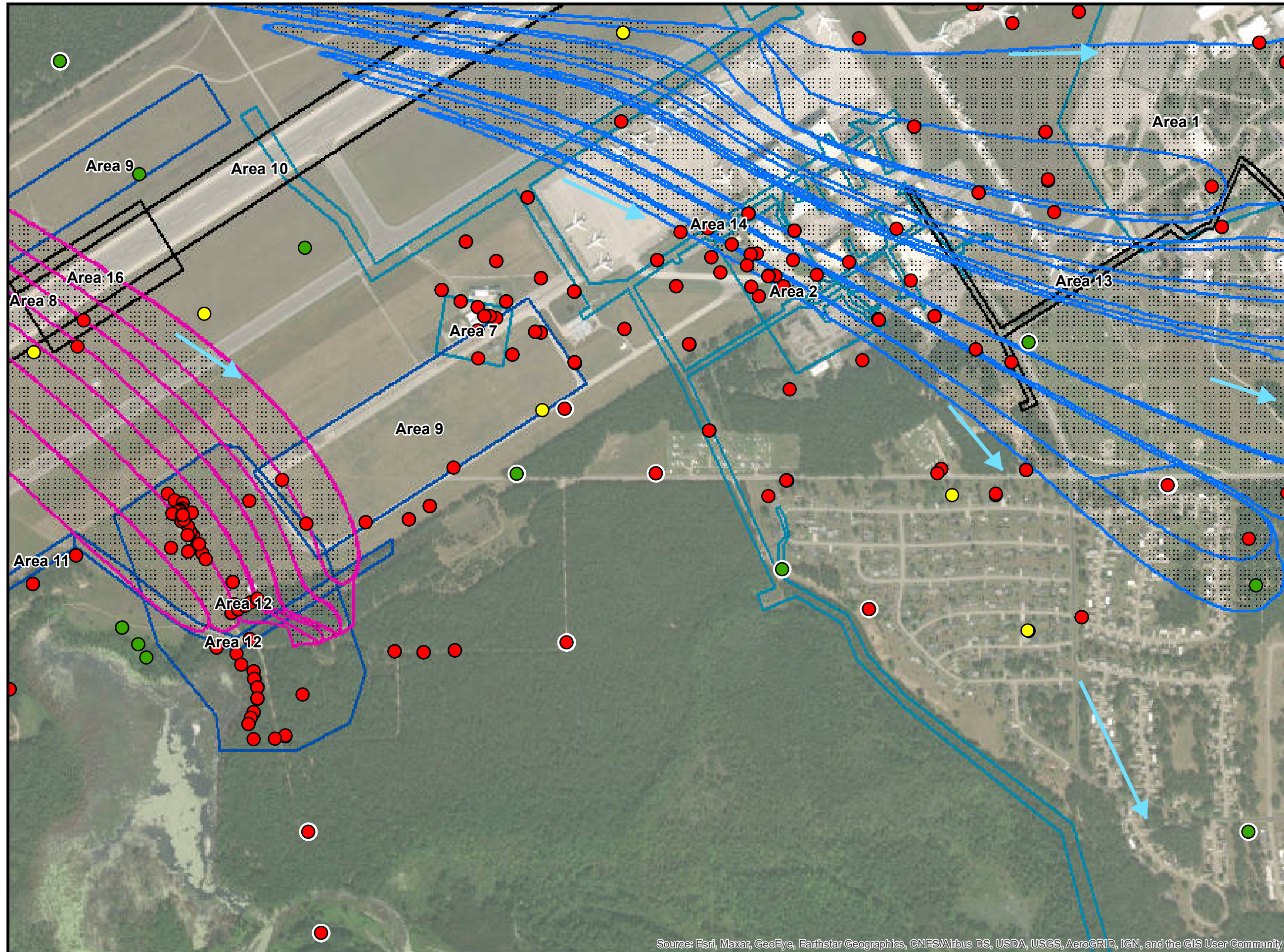
Sincerely,



Mike Neller, Director
Remediation and Redevelopment Division
517-512-5859

Attachment

cc/att: Mr. Daniel Medina, Air Force
Dr. Catharine Varley, Air Force
Ms. Teresa Seidel, EGLE
Mr. Josh Mosher, EGLE
Mr. David Kline, EGLE
Mr. John Bradley, EGLE
Mr. Charlie Bauer, EGLE
Mr. Brad Ermisch, EGLE
Ms. Beth Place, EGLE
Mr. Matt Baltusis, EGLE



Groundwater Analytical Results (PFOS) GSI**

- ND
- <= 12 ppt PFOS
- > 12 ppt PFOS

→ Groundwater Flow Direction

FT-02 PTS Capture

Mission St PTS Capture

Air Force PFAS Site

CAT605P

CG410

FT002

ST069

No Further Action

ADDITIONAL IRA MISSION STREET PTS EXPANSION

**FORMER WURTSMITH AIR FORCE BASE
IOSCO COUNTY,
MICHIGAN**

DRAFT DELIBERATIVE

