



GRETCHEN WHITMER

GOVERNOR

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

LANSING



LIESL EICHLER CLARK

DIRECTOR

July 22, 2021

VIA E-MAIL

Dr. Catharine Varley
BRAC Environmental Coordinator
Air Force Civil Engineer Center
2261 Hughes Avenue, Suite 155
JBSA Lackland, Texas 78236

Dear Dr. Varley:

SUBJECT: Proposed Plan for Interim Remedial Action, Van Etten Lake at Ken Ratliff Memorial Park, Former Wurtsmith Air Force Base (WAFB), Oscoda, Michigan

Thank you for the letter dated July 12, 2021, regarding the Draft Final Proposed Plan for the Interim Remedial Action (IRA) to hydraulically control the migration of Per- and Polyfluoroalkyl substances (PFAS) contaminated groundwater along Van Etten Lake at Ratliff Memorial Park, WAFB, Oscoda, Michigan.

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) agrees with the Proposed Plan for the IRA along Van Etten Lake at Ratliff Park with comment. This is consistent with what has been conveyed to the Air Force (AF) verbally and in writing in the past. EGLE's comments specifically relating to the Proposed Plan document include the following:

- EGLE requests that AF change the sentence, "In addition to the discharge limits in the SRD, other ARARs for this IRA will include solid waste disposal requirements from 40 CFR 261.2 and any state substantive (i.e., non-procedural) requirements regarding the construction of the extraction wells." to "In addition to the discharge limits in the Substantive Requirements Document (SRD), other Applicable or Relevant and Appropriate Requirements (ARARs) for this IRA will include solid waste disposal requirements from 40 CFR 261.2 and any state substantive (i.e., non-procedural) requirements regarding the IRA." The modifier "regarding the construction of the extraction wells" is too narrow and should be broadened to include any ARARs regarding the IRA, not just construction of the wells. EGLE requests the AF convey to the public, why the AF has concluded the extraction wells cannot be extended further than one additional well to the north with the information and data available. If the AF has decided this cannot be

conveyed in the Proposed Plan, then EGLE recommends this is conveyed in the public meeting on the Proposed Plan. While EGLE understands the desire to keep language consistent between the Clark's Marsh Proposed Plan and the Van Etten Lake Proposed Plan, EGLE believes it was an oversight that the Clark's Marsh Proposed Plan language appears to limit identification of ARARs to "requirements regarding the construction of the extraction wells." EGLE does not believe that this fits the shared understanding between EGLE and the AF regarding ARARs for the IRAs. Additionally, EGLE disagrees that, "ARARs identified for the projects included the SRD, waste management, and construction of extraction wells." These are a list of actions to be taken for the IRA, not a list of the ARARs for those actions. ARARs apply to all of the work that will be done in the IRA, not just the subpart of the IRA that is the construction of the extraction wells. EGLE agrees with the AF that the description in the Proposed Plan of the ARARs is supposed to be general, with the details worked out in the Record of Decision (ROD) for the IRA, but EGLE believes the description in the Proposed Plan should be accurate. EGLE believes the proposed language in its original comment addresses this concern. To be clear, EGLE agrees that it will continue to work with the AF to identify the appropriate ARARs for both the Clark's Marsh and Van Etten Lake RODs, which includes all ARARs for any actions taken in the IRAs.

EGLE also recommends that the AF explain to the public, in the Proposed Plan or during the public meeting, why the AF has concluded the system cannot be expanded further beyond the additional well.

Many of EGLE comments are anticipated to be resolved during the review of the Remedial Design (RD) and Remedial Action Work Plan. However, EGLE thinks it important to provide the AF as much insight into our perspective as early as possible in the process.

- EGLE has requested the Geographic Information System shapefiles for the figures, and additional information on modeled capture. This will allow EGLE to complete thorough reviews of RD and Remedial Work Plans without unnecessary delay.
- EGLE requests that the AF maximize capture of PFAS containing groundwater laterally and vertically, to the extent possible, with the proposed system and existing data set. EGLE has requested that the Arrow, Benzene and Mission Street Pump and Treat System are optimized and evaluated for expansions to capture PFAS contaminated groundwater prior to completion of the Feasibility Study and to the extent possible during this IRA.
- EGLE recommends the AF model extraction well capture during high Van Etten Lake levels. EGLE is requesting the reverse particle tracking run until particle termination (i.e., origin of particles captured by extraction wells) for all extraction wells (i.e., existing and proposed), during high lake level and evaluate if bypass occurs between extraction wells. The concern is that the system will pull in lake

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water, making the system less efficient. This may also affect groundwater monitoring downgradient from the extraction wells.

EGLE agrees that the final proposed plan should be made available for public review and comment. EGLE looks forward to moving ahead in the process.

Should you require further information, please contact Beth Place, Project Manager, Remediation and Redevelopment Division, at 517-899-7524; or PlaceB1@michigan.gov; or EGLE, P.O. Box 30473, Lansing, Michigan 48909-7973.

Sincerely,

A handwritten signature in blue ink that reads "Beth Place". The signature is written in a cursive, flowing style.

Beth Place
Project Manager
517-899-7524

cc: Mr. Dan Medina, AF
Ms. Polly Synk, Department of Attorney General
Ms. Meghan Miller, Department of Attorney General
Mr. Joshua Mosher, EGLE
Mr. David Kline, EGLE
Mr. John Bradley, EGLE
Mr. Matt Baltusis, EGLE