



November 6, 2020

Mr. Aaron Assmann, Project Manager  
Grand Rapids District Office  
Remediation and Redevelopment Division  
Michigan Department of Environment, Great Lakes, and Energy  
350 Ottawa Avenue, N.W., Unit 10  
Grand Rapids, MI 49503-2341

RE: October 9, 2020 Compliance Communication: Gerald R. Ford International Airport

Dear Mr. Assmann:

The Gerald R. Ford International Airport (GFIA or Airport) respectfully submits this response to the Michigan Department of Environment, Great Lakes, and Energy's (EGLE's) Compliance Communication dated October 9, 2020. The Airport has used aqueous film-forming foam (AFFF) containing certain per- and polyfluoroalkyl substances (PFAS) because such use has been and is mandated by federal law through the Federal Aviation Administration regulations applicable to all Part 139 airports, like GFIA. GFIA, as a public entity, will take appropriate steps to manage and mitigate any PFAS contamination originating on Airport property consistent with federal, state and local laws. The Airport has conducted and will continue to conduct a comprehensive, multi-phased investigation into possible PFAS contamination at the Airport and its surrounding areas in accordance with the requirements of Part 201 of Michigan's Natural Resources and Environmental Protection Act.

The Airport has continued to submit its investigation reports and plans to EGLE, with updates to the Kent County Health Department and Cascade Township. While certain PFAS compounds have been found on Airport property above Part 201 criteria, GFIA's investigation to-date does not demonstrate that any PFAS associated with the Airport's use of AFFF has migrated off-site.

Specifically, GFIA has discovered PFOS and/or PFOA on Airport property above Part 201 criteria for deep and shallow groundwater as well as surficial soil. The deep groundwater impacts are proximate to the former fire-fighting training area and sampling has demonstrated these impacts decrease downgradient from that area and do not extend to or beyond the airport property boundary. GFIA sampled twenty-eight (28) residential wells immediately downgradient of airport property and all of these 28 wells demonstrated no impacts. No PFAS were detected at 27 of the 28 homes and one home detected two compounds at levels orders of magnitude below the drinking water standards that EGLE has subsequently promulgated.

Shallow groundwater is found on-site only in discontinuous layers and groundwater sampled near the Airport's property boundary is below Part 201 criteria, including samples taken near the Unnamed Tributary that served as a previous stormwater conveyance from the Airport property. To the extent that PFAS has been found in Airport soil samples, none of that soil leaves GFIA property.

With regard to the presence of PFAS in the Cascade Township area, the Airport understands the challenge that the EGLE testing has identified and understands that all homes with identified impacts have been offered alternative water as part of EGLE's investigation. The Airport will continue to work with EGLE to review any analytical results and other investigation information received and will continue with the Airport's Part 201 obligations, including the continued investigation of potential additional source areas and potential off-site migration pathways.

With regard to the further actions EGLE requests in its Compliance Communication, the Airport continues to act in accordance with Part 201. The Airport received a grant from the Michigan Department of Transportation to conduct additional site investigation work. EGLE has reviewed and commented on GFIA's Work Plan and the Airport will continue to update EGLE with new data/information. Once completed, GFIA will share a copy of the results and final investigation report with EGLE and MDOT. The Airport will also take further action as may be necessary pending those investigation results, including developing an appropriate Response Activity Plan.

While investigation work continues, the Airport is developing a Due Care Plan to document its due care activities regarding found impacts. The Airport will provide a copy of that plan, once finalized, to EGLE.

To summarize, the Airport continues to work in accordance with Part 201 related to PFAS impacts to its property associated with past mandatory use of AFFF. The Airport will continue to work with EGLE on these issues. GFIA has invested significant resources into addressing PFAS, including during an unprecedented pandemic that has cut Airport revenues significantly. The Airport reserves all of its rights and defenses and this communication should not be construed as an admission of fault. If you have any questions, please contact us at 616-233-6000.

Very truly yours,



Casey W. Ries  
Engineering & Planning Director

Cc: Abigail Hendershott, EGLE; David O'Donnell, EGLE; Darren Bowling, EGLE;  
Dan Yordanich, EGLE; Nancy Johnson, EGLE; Mike Trout, MDOT; Bryan Budds, MDOT