



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GAYLORD DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 11, 2020

Chairman, Emmet County Board of Commissioners
William L. Shorter
200 Division Street, Suite G74
Petoskey, Michigan 49770

Dear Mr. Shorter:

SUBJECT: Request for Information — Use of Firefighting Foam at the Pellston Regional Airport,
Emmet County, Michigan

The Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division, has information that the Pellston Regional Airport located at 1395 US 31 in Pellston, Michigan (Property) historically used firefighting foam as part of routine fire protection and safety practices. Certain types of firefighting foam (e.g., aqueous film forming foams or AFFF) contain per- and polyfluoroalkyl substances (PFAS), and, more specifically, the hazardous substances perfluorooctanoic acid (PFOA) or perfluorooctanesulfonic acid (PFOS). As of January 10, 2018, groundwater criteria for drinking water protection for PFOA and PFOS were established by EGLE under the authority of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). The groundwater criteria for drinking water protection is 0.07 ug/L (70 parts per trillion) for the combined concentrations of PFOA and PFOS.

Section 20117(1) of NREPA provides that EGLE may require a person to furnish information relating to:

- a) The identification, nature, and quantity of materials that have been generated, treated, stored, handled, or disposed of at or transported to a facility.
- b) The nature or extent of a release or threatened release at or from a facility.

Pursuant to NREPA, EGLE is seeking the following information related to the use of PFAS-containing substances from the Pellston Regional Airport:

1. Were PFAS-containing firefighting foams used for training or other fire suppression purposes at the Property?
2. During what period were PFAS-containing firefighting foams used, and at what frequency (e.g., quarterly, annually)?
3. In what locations were PFAS-containing firefighting foams used at the Property?
4. Was PFAS-containing firefighting foam stored at the Property, at what location, and has there been any evidence of a release of foam to the environment from the storage location?

EGLE is requesting that the Pellston Regional Airport provide responses to these questions within 30 days of receipt of this letter. If information provided by Pellston Regional Airport indicates the likely release of PFOA or PFOS to the environment at levels above the established Part 201 criteria, EGLE will request that a workplan be submitted describing proposed actions to define the nature and extent of PFOA/PFOS, and to conduct response activities as necessary to protect public health and the environment.

If you should have further questions or concerns, please contact the Project Manager, Christiaan Bon at 989-370-9624, or at BonC@michigan.gov; or you may contact me.

Sincerely,



Randall L. Rothe, District Supervisor
Remediation and Redevelopment Division
Gaylord District Office
989-217-0083
RotheR@Michigan.gov