



**DEPARTMENT OF THE AIR FORCE**  
**AIR FORCE CIVIL ENGINEER CENTER**  
**JOINT BASE SAN ANTONIO LACKLAND TEXAS**

29 Oct 20

AFCEC/CIBC  
2261 Hughes Avenue, Ste 155  
JBSA Lackland, TX 78236-9853

Ms. Beth Place  
Superfund Section  
Remediation and Redevelopment Division  
Michigan Department of Environment, Great Lakes, and Energy  
P.O. Box 30426  
Lansing, MI 48909-7926

RE: Identification of State Applicable or Relevant and Appropriate Requirements, Former  
Wurtsmith Air Force Base; Oscoda, Michigan

Dear Ms Place:

The Air Force (AF) acknowledges the receipt of EGLE's letter dated 18 Sep 20 containing standards that EGLE has identified as potential applicable or relevant and appropriate requirements (ARARs) or guidance to be considered (TBCs) for remedies.

As the cleanup process continues to proceed under the Comprehensive Environmental Response, Compensation and Liability Act, the AF will evaluate the state standards EGLE identified in its letter. Although the AF and EGLE are beginning to discuss potential ARARs now, ARARs are not actually chosen until a final remedy is selected for a site. The AF will continue working with EGLE staff during the investigation and remedy selection phases to evaluate potential ARARs for future interim and final remedial actions for Wurtsmith.

The two currently planned interim remedial actions at Van Etten Lake and Clark's Marsh expand current groundwater capture and treatment at the Central Treatment and FT002 systems that address PFOS and PFOA. Therefore the ARARs for these two IRAs are the Substantial Requirements Documents for effluent discharge and disposal requirements for spent treatment materials.

Please contact me at (210) 395-9492 if you have any questions, or require additional information.

Sincerely,

DAVID P. GIBSON, JR., GS-13, DAF  
BRAC Environmental Coordinator  
BRAC Program Management Division

cc:

Ms. Polly Synk, AG

Ms. Megen Miller, AG

Mr. Mike Neller, EGLE

Mr. David Kline, EGLE

Mr. John Bradley, EGLE

Mr. Brad Ermisch, EGLE