



MICHIGAN AIR NATIONAL GUARD
HEADQUARTERS ALPENA COMBAT READINESS TRAINING CENTER
5884 A. STREET
ALPENA, MI 49707-8125

December 6, 2018

Colonel John R. Minor, USAF
Headquarters, Alpena Combat Readiness Training Center
5884 A Street
Alpena, MI 49707

RECEIVED
DEQ / RRD

DEC 10 2018

ERNIE: _____ SID: _____ PM: _____
FILE: _____

Dave Lindsay
Gaylord Field Office
Remediation and Redevelopment Division
Michigan Department of Environmental Quality
2100 West M-32
Gaylord, MI 49735

Dear Mr. Lindsay,

In response to the Alpena Combat Readiness Training Center (CRTC) Compliance Communication letter dated October 22, 2018, we are submitting this response regarding the requested deliverables.

Protecting human health is an Air National Guard (ANG) priority. ANG is proactively identifying where ANG may have released Per- and Polyfluoroalkyl Substances (PFAS) through the use of aqueous film forming foam (AFFF). AFFF was historically used by the base for fire-fighting and training. Current actions to date taken under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), which provides DoD with lead agent authority, include:

- The ANG's preliminary assessment in 2015 identified 10 Potential Release Locations (PRLs) throughout the base; 5 merited further study and were sampled for PFAS in May 2017 during a site inspection (SI).
- In total, the ANG collected 16 groundwater samples, 33 soil samples, 2 sediment samples, and 2 surface water samples as part of their investigation. This information was compiled into a formal SI report and sent to and received by the MDEQ on January 31, 2018.
- In the fall/winter of 2017/2018 the MDEQ conducted residential well sampling of 115 residential wells closest to the base resulting in no exceedances above the MDEQ Part 201 value of 70 ppt.

MDEQ has requested the ANG:

- Immediately take measures to contain or remove the contamination source;
- Immediately identify and eliminate any threat of fire or explosion or direct contact hazards;
- Notify the DEQ and affected neighbors if contamination has migrated off the Property;

Serving the Community, State & Nation

- Delineate the extent of the contamination; and undertake the cleanup of the contamination
- MDEQ also requested that our work plan include provisions to:
- Regularly monitor existing area residential wells for PFAS to ensure levels in drinking water wells are stable and/or below criteria.
- Fully delineate and characterize the PFAS plume(s) caused by the release(s) both on and off-Base to understanding the movement and risks associated with the PFAS contamination.
- Identify and mitigate other receptors and potential exposure pathways to the PFAS impacts.
- Implement a sentinel monitoring well system to assure higher level PFAS contamination is not moving toward additional areas where the groundwater is used as a drinking water source.

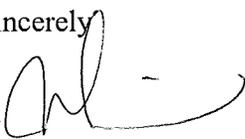
The ANG efforts to further characterize any PFAS contamination on the base or stemming from the base will involve further investigation of the PRLs, to include:

- The development of an expanded conceptual site model that considers localized groundwater and surface water flow paths to select future sampling locations.
- Completing the delineation of PFAS as part of an Expanded SI (ESI) or a Remedial Investigation (RI), which could confirm the groundwater flow direction and expand the groundwater sampling program to complete the horizontal and vertical delineation of PFAS impacts.
- Installing and sampling new and existing downgradient off-base monitoring wells to better define the PFAS that may have migrated from Alpena CRTC.

The National Guard Bureau (NGB) intends to achieve these goals through an environmental contractor, and has requested funding from the Air Force (AF) to conduct either an ESI (FY19) or an RI (FY20). ANG PFAS requirements use the same relative risk model as other restoration sites across the AF and will prioritize the funds accordingly.

Once funded, the investigation will be expeditiously executed and is critical in providing the underlying basis for any long term restoration efforts. Alpena CRTC and NGB will continue to keep you informed regarding our response to this important issue. Questions regarding this letter can be addressed to myself or to Ms. Lisa Kruse at (989) 354-6278, lisa.m.kruse8.nfg@mail.mil.

Sincerely



JOHN R. MINER, Colonel, MI ANG
Alpena CRTC Commander

cc:
NGB/A4OR
MI JFHQ