

Municipal Airport PFAS Funding Frequently Asked Questions

Eligibility

Does the military exclusion for eligibility pertain to real estate owned by the military, or any site where the military is the Potential Responsible Party?

The airport is not eligible for funding in areas where the contamination can be attributed back to the military, except in specific circumstances where there was a joint use of an area. These rare instances should be brought to the attention of Michigan Department of Transportation (MDOT) for further discussions with Department of Environment, Great Lakes, and Energy (EGLE).

We have been sampling the wastewater leaving the airport and it had a raised level of PFAS in the outflow. We have since corrected the outflow related to our ARFF equipment storage floor drains. Could a grant be awarded for ongoing wastewater sampling?

Depending on where the wastewater is discharging to, it is possible that funding could be used for ongoing wastewater sampling. Note that the priorities in the Request for Proposal (RFP) may make ongoing wastewater sampling a lower priority.

If ARFF from an airport discharge contaminated a Wastewater Treatment Plant downstream from the airport, is there funding to assist with cleanup?

No, not with this funding.

Does eligibility change based on who provided Aircraft Rescue and Firefighting (ARFF) services for the airport to meet Part 139 requirements? For example, if the military provided ARFF services on behalf of the airport, while it was joint use?

If there was a discharge related to civilian operations at the airport, sampling may be eligible. Please contact MDOT to discuss further.

Eligible Expenses

For more remote Part 139 airports throughout the Upper Peninsula, are travel costs included in the daily maximums?

While travel expenses are not clearly defined in the in the RFP, environmental benefits will be reviewed in relation to the cost.

Regarding eligible expenses, are both airport personnel and consultant fees eligible? If so, is there a standard formula that we should use to calculate airport personnel reimbursement rates?

The grant application range is from a minimum of \$50,000 to maximum of \$250,000. Proposal evaluation criteria include the anticipated environmental benefits of the project in relation to the cost. Contractors interested in assisting airports are encouraged to consider the EPA consultant cap as a good guideline for maximum hourly and daily costs. In 2020, the daily consultant cap was \$82.12 per hour and \$656.92 per day.

How will airports verify if their consultant is qualified to do this type of work?

Airports should consider reviewing a consultant's portfolio to see how many PFAS sites they have worked on.

Work Plan

Can monitoring occur off airport property?

Yes, if it is known or suspected that a plume is leaving airport property.

Is a phased implementation of investigation allowed to maximize cost-effectiveness?

Yes, and it should be adequately detailed in proposals. Note that the RFP states that all work must be completed 18 months after the start date of the grant.

If an EGLE mandated work plan has been developed, but not yet approved by the application due date, can the draft work plan be submitted with the grant application?

Yes, MDOT will consult with EGLE on a case-by-case basis.

Discovery

Grant applications are not confidential. What about sampling results?

No.

What if something is found after testing and the airport does not have the financial resources to correct the issue?

Further discussions between MDOT and EGLE will take place to determine an appropriate course of action.

Has EGLE determined what happens after the sampling is conducted and report submitted? Will enforcement be considered?

The grant program was established with public funding to help current and former Part 139 airports investigate PFAS in groundwater. The first priority is to protect public health. Sample results will be used to evaluate groundwater flow direction, characterize the levels of PFOS/PFOA in the groundwater, and evaluate risks associated with the groundwater. If on-site groundwater monitoring results are over Part 201 criteria (currently 70 parts per trillion PFOS + PFOA), EGLE will ask the airport to continue conducting the investigation to delineate the plume and implement other obligations under Part 201. EGLE is always willing to provide technical assistance for those efforts and uses enforcement actions only if a liable party fails to meet their Part 201 obligations.

If PFAS contamination is found at the Airport what would be the next step?

Depending on the source resulting in PFAS contamination, the next step would be an additional investigation to determine the nature and extent of contamination.

Will there be any funding for the next step?

Currently unknown.

Miscellaneous

The original version of the RFP included reference to sending samples to the DHHS lab; the updated version removed that. Where should we send samples?

There are many qualified labs in the State of Michigan and nation-wide that can analyze PFAS samples. EGLE and MDOT cannot endorse any particular lab, however it is strongly

recommended that the selected lab be certified through the National Environmental Laboratory Accreditation Program.

Are any of the investigation activities (study, soil or water samples, etc.) eligible for insurance claims?

Check with your insurance carrier to review your policy.

Is testing required? Is this mandatory?

No, testing is not required; this is a voluntary grant program. Note that EGLE has sent letters to several Part 139 airports to seek information on the use of AFFF. If the response stated that AFFF was used, EGLE sent a follow-up compliance letter asking the airport to develop a work plan for sampling to verify whether PFAS is affecting the site or surrounding area. Several Part 139 airports have received such letters and will be using those work plans as their submittals for this grant program.