

Meeting Minutes
Wurtsmith BCT Meeting
24 March 2020
Teleconference

Bay West Project No. J150073
Location: Teleconference

Meeting Date: Tuesday, 24 March 2020
Meeting Time: 0900-1100 EST

MEETING ATTENDEES VIA TELECONFERENCE:

Dave Gibson	AFCEC	Lee Major	Cherokee Nation
Mark Weegar	Cherokee Nation	Abiy Mussa	MDHHS
Jeremiah Morse	AECOM	Andrea Keatley	MDHHS
Dale Corsi	DLZ	Beth Flynn	Wood
Paul Walz	Bay West	Saamih Bashir	Wood
Dirk Pohlmann	Bay West	Ryan Morrish	Bay West
Andrea Stawowy	Bay West	Ann Person	EGLE- RRD – Bay City
Matt Siler	EGLE- WRD – Bay City	Amanda Armbruster	EGLE- RRD – Bay City
Mike Neller	EGLE- RRD – RRD Division Director, Lansing		
John Bradley	EGLE-RRD – Superfund Section, Lansing		
Beth Place	EGLE-RRD – Superfund Section, Lansing		
Matt Baltusis	EGLE-RRD – Superfund Section, Lansing		
Dan Yordanich	EGLE-RRD – Compliance/Enforcement, Lansing		

The meeting was held via Skype. The meeting began at 0900 hours on 24 March 2020 and adjourned at 1100 hours. The meeting agenda is attached and posted to the Bay West Collaborative Website.

1. Opening Remarks

D. Gibson opened the meeting with a greeting and introductions. The meeting purpose was to discuss environmental restoration program work at the former Wurtsmith AFB.

2. Previous 18 February 2020 BCT Review

- a. The 18 February 2020 BCT Meeting Minutes were provided to EGLE for review on March 11, 2020 and are still under review. (Note: comments were submitted on 25 March 2020, the minutes were finalized on 26 March 2020 and posted on the collaborative website, a copy will also be placed in the IR at the Oscoda Library once it reopens.)
- b. Action Items – EGLE
 - i. Provide comments on Wurtsmith documents
 1. Discussed in section 3 below.
 - ii. Check with Attorney General on what is releasable via FOIA regarding PII/ Residential Well data report.
 1. Task has been completed. MI Assistant Attorney General sent a letter to the Air Force dated 25 February 2020. Michigan will honor federal FOIA exemptions related to Air Force documents which contain PII as discussed in the letter.
 2. How draft documents are handled between the agencies is still under discussion. As the submittal and review process for draft documents is still being resolved, this topic will remain on future BCT meeting agendas until the new procedure is implemented.
 3. In the future D. Gibson noted that the Air Force will request EGLE provide comments in a specific timeframe for specific documents.

4. There was specific discussion of the ESI report. Air Force plans to discuss ESI at the RAB meeting and will provide opportunity for the RAB to submit comments on the final version. The timeline for EGLE review of Air Force responses to the EGLE comments on the ESI will be set when transmitted to EGLE. The details of a revised ESI or addendum are still be worked out, but EGLE comments and responses will be included in the documents.
 5. B. Place wanted to clarify that when a document contains PII, EGLE will receive two versions, the original and the redacted version. D. Yordanich commented that is what the PII letter dated 25 February 2020 stated. D. Gibson that is what the Air Force will comply with the letter. (Note: After the meeting AFCEC reviewed the MI Attorney General letter and it does not require two versions of the document containing the PII.)
- iii. Review Wurtsmith UFP-QAPP and draft an agreement on the metrics that will be used for data quality assessment should QA/QC samples be collected by EGLE, including reconciliation if the agreed upon metrics are not achieved.
1. B. Place agreed to review the QAPP and the split sampling language. B. Place will draft a split sampling procedure and the Air Force/EGLE will discuss. The task is not to revise the QAPP. This task is in progress and should remain on the agenda.
- c. Action Items – Air Force
- i. Contact FPM for new transmittal letter for the LF-30/31 30% Design. Transmittal letter to be updated with the actual date the LF-30/31 30% Design was delivered to EGLE.
 1. Task completed. EGLE received the new transmittal letter dated 10 February 2020.
 2. D. Gibson stated that the Air Force was not waiting for EGLE comments on the LF-30/31 30% Design. EGLE requested the design and the Air Force provided it. B. Place stated that EGLE will submit the comments before 10 April 2020. D. Gibson stated that there was no change to the remedy so there is no need to wait for EGLE review and approval of the proposed storm water diversion. B. Place stated that EGLE disagrees as the work is a form of maintenance.
 3. D. Gibson wants to establish timeframes for regulatory reviews to mitigate delays to the remediation contracts in the future. When a document is submitted to EGLE for review, the cover letter will state when comments are needed by, after which time the Air Force may proceed with or without EGLE comments. Not all documents submitted require EGLE review. B. Place asked what is the criteria for choosing which documents the Air Force will allow EGLE a comment period on? A meeting will be set up with the Air Force and EGLE to discuss details of document reviews.
 4. M. Neller stated that a list of documents would be a great help, but a timeline for the project would be of more use. It would be easier for EGLE if there was a plan in place. D. Gibson acknowledged this statement.
 - ii. Determine path forward for Air Force Residential Well Sampling Plan, since current contract including sampling has been completed.
 1. D. Gibson stated that round 6 of the sampling has been completed.
 - iii. Approve the 4th and 5th Quarterly Residential Well sampling data and submit to EGLE.
 1. The documents are undergoing final review.
 2. B. Place asked if additional sampling was scheduled. D. Gibson stated that Quarterly sampling will be completed with the RI. D. Gibson correction: A sentinel well

- program will be implemented in the RI phase of work. The Air Force will provide the results from the EPA calculator to EGLE.
- iv. Confirm with AFCEC management whether the MPTS EE/CA will be submitted for EGLE review.
 - 1. Still in review with Air Force legal, no update at this time.
 - v. Add Mission Street EE/CA and Action Memorandum to the Agenda.
 - 1. Mission Street EE/CA has been added to Air Force updates section of the Agenda.
 - vi. Add Schedules to Agenda for: tentative schedule for the PFAS RI, with milestones.
 - 1. Tentative schedule for the PFAS RI, with milestones has been added to Air Force updates section of the Agenda.
 - 2. The Air Force is working on the contract for the full RI, the goal award date is September 2020. After the contract is in place the contractor will develop a schedule to complete all the tasks. The RAB slides include a generic schedule.
 - vii. D. Gibson will follow up on the OWAA 10 Parcels status and the topic will be added to the agenda.
 - 1. OWAA 10 parcels has been added to Air Force updates section of the Agenda.
 - 2. D. Gibson: responses to questions from the Legal Department have been provided and needs to follow up with the Real estate team.
- d. Action Item – MDHHS
- i. Provide agency’s guidance for sharing AFCEC reports that contain PII with public when FOIA requests are received.
 - 1. The task was completed on 2 March 2020 with a letter from MDHHS to AFCEC.
 - ii. Check with management about providing the Air Force a copy of the Residential Well sampling plan and sampling results.
 - 1. MDHHS provided the Air Force a copy of the sampling plan.
 - 2. A. Mussa asked if MDHHS would be receiving an electronic or hard copy of the data. D. Gibson stated that they will get an electronic version of the report and the lab results. A link will be sent to so the data can be downloaded. (Since the last BCT it was determined that EGLE will provide the residential well reports)

3. DOCUMENT SUBMISSION SCHEDULE AND STATUS

- a. Draft 2017 LTM Annual Report (Bay West)
 - i. Under EGLE senior review, comments should be provided this week. (Note, comments were provided on 25 March 2020.)
- b. Draft 2017 PTS Annual Report (Bay West)
 - i. Under EGLE senior review, comments should be provided this week. (Note, comments were provided on 30 March 2020.)
- c. Draft 2018 LTM Annual Report (Bay West)
 - i. Under EGLE senior review, comments should be provided this week. (Note, comments were provided on 25 March 2020.)
- d. Draft 2018 PTS Annual Report (Bay West)
 - i. Submitted for Air Force review 18 March 2020, it should be submitted to EGLE in approximately 40 days.
- e. Draft Final SS-57 ESD (Bay West)
 - i. Under EGLE review comments should be provided next week.
- f. LF-30/31 30% Design

- i. EGLE will submit comments on 10 April 2020.
- g. Draft SS-57 RA-C Report (Bay West)
 - i. Currently under Air Force review.
- h. Draft SS-017 Site Closure Technical Memorandum (Bay West)
 - i. Approved by the Air Force, Bay West will submit it after the VIAP is approved. SS-17, which was a fuel oil AST site, is included in the VIAP, as no further action. Site SS-17 is entirely contained within site SS-21, all VOC contamination remaining would be associated with SS-21.
- i. Draft SS-072 Proposed Plan (Bay West)
 - i. Currently under Air Force Review
- j. Five-Year Review (Bay West)
 - i. Under Air Force for review, EGLE will receive a Final copy of the document.
 - ii. A transmittal letter will be included with the Final document, it will identify the EGLE time frame that the Air Force will accept comments. There is no timeline set up now, details are being worked out.
- k. The 4th and 5th Private/Public Drinking Water Monitoring Report (Wood)
 - i. Wood is drafting responses to Air Force comments.
- l. VIAP Work Plan (Bay West / Wood)
 - i. The working copy will be submitted to Air Force on 31 March 2020.
- m. The Final ESI Report (Wood)
 - i. Wood is Drafting Responses to EGLE Comments (RTCs).
- n. 2019 Annual Reports (Bay West)
 - i. LTM AR is scheduled to be submitted to the Air Force in April 2020.
 - ii. Systems AR is scheduled to be submitted to the Air Force in May 2020.
 - iii. PTS AR is scheduled to be submitted to the Air Force in July 2020.

4. FIELD WORK UPDATE AND SCHEDULE

- a. FT-02 Carbon Change out
 - i. The 19th GAC change out took place on 5 March 2020, 102 days since the last change out. The next change out is scheduled for 8 June 2020, this date could be pushed back, depending on analytical results from the weekly sampling.
 - ii. There was an outlier effluent result/detection in December 2019, but all other results were non-detect until the week of the change out. Just prior to change out there were detections, with PFOA and PFOS concentrations J flagged as being between the level of detection and the level of quantitation.
- b. SS-57 RAWP Implementation
 - i. January 2020 results are being validated and data will be presented at the next BCT.
- c. FT-02 RAWP Implementation
 - i. D. Gibson stated that Bay West should be receiving a Modification in the near future that will include the FT-02 concrete transportation and disposal. Once contract mod is awarded, Bay West will implement the FT-02 VOC source area RAWP.
- d. Annual LTM groundwater monitoring
 - i. The LTM is scheduled to begin in May 2020. Bay West will send the Sampling Plan to the Air Force for approval, then it will be sent to EGLE.
- e. VIAP Update

- i. The working copy of the VIAP Work Plan was schedule to be submitted to the Air Force on 31 March 2020.
- f. Wood Field Work Update
 - i. On 11-12 February 2020 the last of the public and private wells were sampled. The Well Sampling Report is being drafted and is on schedule to be submitted to the Air Force in April 2020. This was the last field event under their contract.

5. AIR FORCE UPDATES

- a. RAB
 - i. The test run of the electronic meeting is scheduled for today. The date for the RAB meeting will be determined after the test run. The slides and information have been provided to the RAB members.
- b. Central Treatment System (CTS) Status
 - i. CTS has been operating on the interim sampling plan. At the April 2019 SRD meeting it was decided that after the next GAC change out, enough data would be available to discuss modifying the sampling frequency, including possibly removing the weekly sampling. The second GAC change out in the sacrificial vessel was completed on 3 February 2020, and the lead vessel was changed out on 17 February 2020. The Air Force would like EGLE to assess and discuss sampling modifications for the CTS now that two GAC exchange cycles have been completed. Can EGLE let the Air Force know what is needed for sampling modifications? The topic will be added to the EGLE Agenda Items.
- c. Mission Pump and Treatment System (MPTS) Status
 - i. The “shake down” process is proceeding. Results of sampling show the treatment for PFAS is working as designed.
 - ii. Oscoda Township is threatening to disconnect the MPTS from the storm sewer line because the Air Force has not been paying the \$3,500 per month discharge fee. The Air Force wants an independent evaluation of how the fee was calculated and to determine if the Township’s fee is reasonable. Mr. Weed has stated in an Oscoda Press article that EGLE is fine with groundwater injection, so why does not the Air Force just do that. M. Siler stated he is unsure why Mr. Weed spoke for EGLE, but that statement is not true. M. Neller stated he can understand Oscoda Township’s frustration, the longer this process takes the more it looks like the Air Force is stonewalling the Township. D. Gibson stated that this is an out of cycle project, it needs approval from SAF (takes time to obtain funds and award the contract). The purpose of the A&E contract will be to evaluate the methods used to calculate the discharge fee, and if the discharge fee represents a reasonable charge. The Contract should be awarded by early summer 2020.
- d. LF-30/31 FS Status
 - i. Air Force has reviewed the FS and has provided comments to the contractor. FPM is addressing both Air Force and EGLE comments. For this contract, only 30% of the design of the surface water run-off control is funded. The final design will be completed under another contract. B. Place asked what comes next after the 30% Design. D. Gibson stated the work will need to be programmed, at this time it is unknown if it will be completed in the next PBR contract, no timeframe has been established. M. Weegar stated that diverting the storm water will have a positive effect, but it is not characterized as a remedial action.
- e. OWAA 10 parcels
 - i. Discussed previously.

- f. MPTS EE/CA and Action Memorandum
 - i. Still under Air Force review.
- g. Tentative schedule for the PFAS RI, with milestones
 - i. The RAB slides included the generic schedule to be completed in the period of performance. A. Stawowy asked if the topic could be removed from the agenda since there would be little to no new information until contract award in September 2020. B. Place asked that it remain on the agenda. D. Gibson explained that the RI will include a site-wide investigation with a set period of performance. When specific activities are scheduled depends on the contractor schedule. D. Gibson stated that the Air Force is putting flexibility in the contract to allow consideration of interim actions once sufficient data is available. EGLE will be kept updated throughout the process. D. Gibson cited the AFTI 32-7020, last updated 12 March 2020 for the roles and responsibilities.
- h. Past Air Force residential well sampling results
 - i. Discussed Previously.
- i. MMRP
 - i. The project needs to be funded to close 4 sites, hopefully in FY 2021.

6. EGLE RRD – SUPERFUND SECTION UPDATES

- a. RAB
 - i. Slides have been shared and the weblink will be tested this afternoon.
- b. EGLE data
 - i. A separate call will be scheduled with Air Force and EGLE to discuss what documents will require EGLE review and the reasoning.

7. EGLE RRD – BAY CITY DISTRICT UPDATES

- a. Kings Corner Road Dump
 - i. No update.
- b. Oscoda area sampling
 - i. A. Armbruster stated the next round of sampling in the Oscoda area is scheduled for late April/early May 2020.

8. EGLE WRD – UPDATES (no one from this division was attending the meeting during this discussion)

- a. SRD Update: Process to issue “replacement” SRD for CTS and MPTS
 - i. Updating the interim sampling plan will be added as an action item for EGLE.
 - ii. M. Weegar stated after two GAC changeouts EGLE stated they would reevaluate the sampling frequency at CTS. The Air Force is initiating that conversation, what data does the WRD need to review.

9. MDHHS UPDATES

- a. Residential Well sampling update
 - i. A. Mussa stated that 400 letters were mailed to Oscoda residents, and 66 responses were received. MDHHS is making appointments to sample wells but sampling may be spread over many weeks.

10. Next Meetings:

- a. BCT – 28 April 2020 0900-1100 EST

11. ACTION ITEMS:

- a. EGLE
 - i. Provide comments on documents submitted for review in accordance with the schedule provided.
 - ii. Review Wurtsmith UFP-QAPP and propose metrics for assessing data quality for split samples and corrective actions if metrics are not met.
 - iii. Inform the Air Force what data is needed to update the CTS Interim sampling plan.
- b. Air Force
 - i. Notify EGLE how draft documents will be handled.
 - ii. Approve 4th and 5th Quarterly Residential Well sampling data and submit to EGLE. (note the data was submitted to EGLE on 8 April 2020.
 - iii. D. Gibson will follow up on the OWAA 10 Parcels status.
 - iv. Schedule a call with EGLE to discuss the document review process going forward, (e.g., which documents will be submitted for EGLE review and comment, which documents will be submitted for informational purposes only, timelines to provide comments on documents submitted for EGLE review, etc.). (Call was held on or about 26 Mar 2020. D. Gibson is working on the approach to be used for draft documents Note: Subsequent to the BCT EGLE/AFCEC agreed to general timeline (i.e., 45 days) for review of drafts. Review time times may be reduced based upon contract requirements.

1. Opening Remarks/General Business

2. Previous BCT Meeting – 18 Feb 2020

- a. Meeting Minutes
- b. Action Items - EGLE
 - i. Provide comments on Wurtsmith documents submitted for review in accordance with the schedule.
 - ii. Check with Attorney General on what is releasable via FOIA in regard to PII/ Residential Well data report. (completed MI Assistant Attorney General letter dated 25 February 2020).
 - iii. Review Wurtsmith UFP-QAPP and draft an agreement on the metrics that will be used for data quality assessment should QA/QC samples collected by EGLE differ from those collected by the Air Force, including reconciliation if the agreed upon metrics are not achieved.
- c. Action Items - Air Force
 - i. Contact FPM for new transmittal letter for the LF-30/31 30% Design. New transmittal letter to be updated with the actual date the LF-30/31 30% Design was delivered to EGLE. (completed EGLE received the new transmittal letter dated 10 February 2020.)
 - ii. Determine path forward for Air Force Residential Well Sampling Plan, since current contract including sampling has been completed.
 - iii. Approve the 4th and 5th Quarterly Residential Well sampling data and submit to EGLE.
 - iv. Confirm with AFCEC management whether the MPTS EE/CA will be submitted for EGLE review.
 - v. Add Mission Street EE/CA and Action Memorandum to the agenda – added to Air Force updates section
 - vi. Add Schedules to Agenda for: tentative schedule for the PFAS RI, with milestones – added to Air Force updates section.
 - vii. D. Gibson will follow up on the OWA 10 Parcels status and the topic will be added to the agenda.
- d. Action Items - MDHHS
 - i. Provide agencies’ guidance for sharing AFCEC reports that contain PII with public when FOIA requests are received. (completed 2 March 2020 letter from MDHHS to AFCEC)
 - ii. Check with management about providing the Air Force a copy of the Residential Well sampling plan and sampling results.

3. Document Submission Schedule and Status

Document (Contractor)	Date submitted to EGLE	EGLE Estimated Review Date	Comments
Draft 2017 LTM AR (Bay West)	11-21-18	2-28-20	Discussed on 2-12-20
Draft 2017 PTS AR (Bay West)	3-5-19	2-28-20	
Draft 2018 LTM AR (Bay West)	4-4-19	2-28-20	Discussed on 2-12-20
Draft 2018 PTS AR (Bay West)			Submittal scheduled for the week of 3/16
Draft Final SS-57 ESD (Bay West)	1-9-20	Mid-March 2020	
Draft SS-57 RA-C Report (Bay West)			AF review
Draft SS-17 Site Closure Tech Memo. (Bay West)			Will be submitted to EGLE after VIAP Work Plan is approved.

Draft SS-72 Proposed Plan (Bay West)			AF review
Draft Five-Year Review (Bay West)			Submittal scheduled for the week of 3/16
4 th and 5 th Private/Public Drinking Water Monitoring Report (Wood)			AF review
VIAP Work Plan (Bay West / Wood)			Working Copy to be submitted to Air Force and EGLE on 31 March
Final ESI Report (Wood)			

4. Field Work Update and Schedule

- a. FT-02 Carbon change out event was completed on 5 March 2020, approximately 102 operational days since the last change out. The next change out is tentatively schedule for the week of 8 June 2020 approximately 95 days since the last change out.
- b. SS-57 RAWP Implementation – Presentation on baseline and first post-injection performance monitoring results will be given at the April 2020 BCT. Second post-injection performance monitoring event scheduled for the week of 13 April 2020.
- c. FT-02 RAWP Implementation – Pending decision by AFCEC management on concrete disposal and funding of the same.
- d. Annual LTM groundwater monitoring scheduled to begin May 2020. Schedule to be provided to EGLE prior to commencement of field work.
- e. VIAP Update – As noted above in Document Submission Schedule and Status.
- f. Wood Field Work Update – Completed the 6th and final quarterly private and public well sampling event 11-12 February 2020. Event included only wells not connected to municipal water (7 private and 2 public wells). Report is being drafted and is expected to be submitted in April 2020. This is the last field work task under TO 149.

5. Air Force Updates

- a. RAB Update
- b. Central GAC Treatment System (CTS) Status – Weekly Sampling.
- c. Mission Pump and Treat System (MPTS) Status
- d. LF-30/31 FFS status update on RTCs for LNAPL FFS and the LF-30/31 30% Design.
- e. OWA 10 parcels
- f. Mission Street EE/CA and Action Memorandum.
- g. Tentative schedule for the PFAS RI, with milestones.
- h. Past Air Force residential well sampling results
- i. MMRP
 - i. Previously stated at the 25 June 2019 and 24 July 2019 BCT meetings that the MMRP site closure will be included in the 2021 PBR contract if funded. (These sites include XE404, SR408, OT049 and XE402.)

6. EGLE RRD - Superfund Section Updates

- a. Other – RAB topics
- b. Submittal of EGLE data to Air Force

7. EGLE RRD - Bay City District Updates

- a. Kings Corner Road Dump
- b. Au Sable Township

8. EGLE WRD Updates

- a. SRD Update: Process to issue “replacement” SRD for CTS and MPTS.
- b. Other – Surface water/fish sampling in area

9. MDHHS Updates

- a. Residential Well sampling update

10. Schedule Next BCT Meeting

- a. 28 April 2020 teleconference 0900-1100 EST