

RAB Questions

30 August 2018 Wurtsmith RAB meeting

Requests/Comments:

- 1. What is the Air Force decision on the AFFF release near the high school? Does the Air Force take responsibility? Who will investigate this release? Who will pay for an alternate drinking water supply for the private well above HA?**

The Air Force will not be including the AFFF release area by the high school in our PFOS/PFOA investigation.

The Air Force is committed to protecting human health and is taking aggressive measures to determine where there has been an impact on drinking water supplies from our mission activities. Where concentrations of PFOS/PFOA in drinking water are above the Environmental Protection Agency lifetime health advisories (EPA LHAs) due to AF mission activities, the Air Force immediately provides alternate drinking water and implements long-term steps to ensure safe drinking water.

Investigations by the Michigan Department of Environmental Quality (MDEQ) and MDHHS have found that the PFOS/PFOA levels in the Oscoda High School drinking water supply have been below EPA LHA. Additionally, groundwater migration pathways from mission activities on Wurtsmith Air Force Base to the Oscoda High School area have not been identified.

The two fires near Oscoda High School fire were not mission related. Furthermore, there are no records indicating the Air Force used AFFF at either the 1984 forest fire or the 1995 bus barn fire.

1984: There are no records that suggest the AF responded to the forest fire with AFFF; the records only indicate the AF brought in two to three “thousand-gallon tankers” and “sent out busloads of G.I. personnel with shovels” to help battle the forest fire (AP article dated 4/29/1984).

1995: WAFB closed two years before the bus barn fire. A memo from the township fire chief at the time of the fire attests the Wurtsmith Development Commission (WDC) caretaker manager dispatched the caretaker fire fighters to the bus barn fire. The WDC was an entity of Oscoda Township.

- 2. What’s the latest on the dispute resolution?**

The dispute resolution process is a collaborative process and is ongoing between the AF and MDEQ. Until the DR is resolved the issues are being addressed between the two parties and are not ready for release to the public. The last correspondence between the Air Force and the MDEQ was a letter from the Air Force responding to MDEQ issues on March 15, 2018. The MDEQ has not provided a formal response to the AF’s March 15, 2018, letter, and no date has been set for a follow-on meeting between the two parties. MPART has elected to post all correspondence related to the dispute resolution on its website:

https://www.michigan.gov/pfasresponse/0,9038,7-365-86511_82704_83952-455897--,00.html

- 3. Please provide a timeline for follow-on actions. When can we expect the RI phase to begin?**

In accordance with CERCLA, at the conclusion of the Supplemental Site Inspection (SSI) the USAF will determine whether further action is warranted. Final remedial actions will be determined under the CERCLA process and these typically come after a remedial investigation (RI), including risk assessments, and feasibility study (FS) are completed. No timeline exists for entering the RI phase.

However, the Air Force will continue to provide updates via the Restoration Advisory Board and continue to protect human health and drinking water supplies affected by its past mission activities throughout the process.

4. Please provide context for the impact of the total gallons of groundwater treated per day by the granular activated carbon (GAC) systems. Please represent how that impacts the treatment area.

- FT-02 GAC Treatment System treats up to 240 GPM and the treated groundwater is discharged into the groundwater via an infiltration gallery for hydraulic control.
- New Central Treatment System (CTS), which captures the discharges from the Arrow Street and Benzene treatment systems, has the capacity to treat up to 500 GPM, but it currently treats approximately 240 GPM. When the Mission treatment system is connected to the CTS, the CTS will treat approximately 300 GPM. Treated groundwater from the CTS is discharged to Van Etten Creek.

Data at FT-02 shows that by 2017 PFOS/PFOA levels that are downgradient of the FT-02 treatment system and near the center of the plume had been reduced to as low as 1/6th their 2015 concentrations. Furthermore, the investigations the AF has accomplished under the SSI indicate that the three systems at Arrow, Benzene and Mission are capturing the vast majority of the PFOS and PFOA and preventing the contamination from migrating off site to drinking water sources.

5. Will the Air Force reconsider its stance on foam now that testimony at the U.S. Senate hearing from the Director of the National Institute of Environmental Health Sciences indicated it is dangerous to touch?

The Air Force stance regarding foam has not changed. The AF does not develop cleanup criteria or toxicity factors for contaminants of concerns, including PFOS/PFOA. The AF relies on federal and state regulators and health agencies to promulgate cleanup standards based upon scientifically valid and peer-reviewed toxicity factors. Currently there are no regulatory requirements regarding foam. The MDHHS released a statement in August 2017 that skin contact with PFAS is not a significant exposure pathway and does not require a “no-contact” advisory: <https://www.dhd2.org/wp-content/uploads/2017/08/VEL-foam-letter-to-DHD2-080217-letterhead.pdf>

The Air Force remains focused on protecting human health by implementing steps to ensure safe drinking water.