



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

February 4, 2022

VIA EMAIL

Dear MPART Citizens Advisory Workgroup Members:

I greatly appreciate the time, energy, and expertise you invested in the public notification recommendations you shared in your July 2021 memo. MPART deeply respects the experiences in which your recommendations are rooted as Michiganders personally impacted by PFAS. Bringing that perspective to MPART's work is a core purpose of the CAWG, and we are grateful to you for serving Michigan in that way.

Per your memo's core principles, we all share the desire to provide Michiganders more information and better equip residents to make informed health decisions for themselves and their families. Your memo makes recommendations that can be grouped into two primary strategies:

- Strengthening online tools to maximize the quality and quantity of information that is readily available and accessible to the public; and
- Continually refining our efforts to notify and update potentially impacted residents about site-specific investigations.

In each case, the CAWG has already spurred improvements in MPART's approach, and we look forward to working with you to continue that progress. As a basis for that ongoing discussion, the following provides my sense of where we stand today in each area and where I hope we can head together from here. In the process, I offer initial feedback on your memo based on conversations with my MPART and Department of Environment, Great Lakes, and Energy (EGLE) colleagues.

A. Continuing to strengthen online tools.

Your memo recommended that MPART provide "an on-line easily accessible periodically-updated PFAS 101 course" and continue its "development of the Web Based PFAS Contamination Location System." These are good ideas. In fact, we are already moving in that direction.

With your advice and urging, MPART has made continual improvements to our website recently. We have added a greater range of background materials, sampling results, and resource links, and made available information more searchable and

accessible to visitors.¹ The site already features much of the content and many of the formats that would make up an effective PFAS 101 course, including [infographics](#), [educational videos](#), and [frequently asked questions](#) on a range of topics. With CAWG guidance and support, perhaps through the Web Review Subcommittee, our team could fill any gaps and organize that content into a “PFAS 101 course” that could walk viewers down a logical path to understanding the basics. Our team looks forward to working with the CAWG to develop a plan for doing just that.

In addition, as your memo’s fifth recommendation previewed, the web-based PFAS Information System is now live on the MPART web page with PFAS sites, surface water sampling data, and Statewide Testing Initiative public drinking water results. Data from fish samples, the Industrial Pretreatment Program, and other aspects of MPART’s work is forthcoming. I see this system as a critical hub for our ongoing public notification work. The CAWG can and should provide us vital feedback and advice as we work to add more layers of information and make it more accessible and understandable to users. In the months ahead, I hope we can identify the best approach for collaborating to that end.

I think online tools will also drive progress on your third recommendation related to “ongoing progress notification.” As our number of sites continues to grow, providing interested residents with new data and ongoing updates from MPART investigations will only be possible to the extent we make effective use of web-based applications and automated forms of communication.

B. Refining public notification responses to site-specific investigations.

Two of your recommendations touched on improving notification at the site- or investigation-specific level. The CAWG has also provided leadership in improving this critical aspect of MPART’s work. An example is the 250 proactive and precautionary residential well tests we have recently performed around Michigan airports and other likely PFAS sites. As with strengthening use of online tools, this is fertile ground for MPART and the CAWG to collaborate over time and make continuous improvements.

Your memo recommends that MPART provide “direct notification” to all “potentially impacted households and individuals” at the “beginning of any investigation” into “any household or other water supply, body of surface water, or other exposure pathway.” I propose we instead pursue a more flexible, case-specific approach that recognizes strategic public health considerations, resource constraints, and other factors.

¹ Among other recent changes, we have added project site lead contact information, technical workgroup pages, and surface water/foam sampling results to the web page; blended area of interests and site investigations into one page; created a sortable table of PFAS sites/areas of interest so the public can quickly access those in their area; and posted residential well sampling to the table so viewers can quickly see where this has been done. We are also working to combine all public drinking water data.

On one end of the spectrum, discovery of a high-concentration source of PFAS with a clear pathway to human exposure via drinking water wells demands swift and comprehensive action. Tactics we have used in such situations include actively partnering with local public health officials, engaging elected leaders and community groups, and canvassing affected residents. In some cases, we have also hosted town halls, provided alternative drinking water, and alerted the media.

On the other end of the spectrum is a scenario like a surface water sample showing low levels of PFAS without a clear exposure pathway or understanding of which Michigan residents are likely affected (or how and to what extent). Posting available information online and notifying relevant local officials may be the appropriate notification response in this situation.

Between those two poles, there are a potentially infinite number of conceivable scenarios. While we cannot develop a playbook that guides our response in every unique case we will encounter, we can use our bank of experiences to create a clearer sense of what should happen in different types or categories of situations. We can also reflect on our experiences and refine the playbook over time.

I hope we can work together to create a plan and process for doing that and approach those conversations with a recognition that we are learning as we go and all share the desire to improve transparency and close the gap between the status quo and your memo's vision.

Again, I want to thank you for the time and thought you put into your July 2021 memo. Your recommendations provide a valuable set of guideposts for shaping our efforts to fulfill the CAWG's purpose and mission in the coming months and years.

I hope you will read this response as a commitment by MPART to partner with you in protecting public health. I look forward to discussing your recommendations and this response—and how we can best move forward—at an upcoming CAWG meeting.

Sincerely,



Abigail Hendershott, Executive Director
Michigan PFAS Action Response Team
616-888-0528

cc: Ms. Liesl Eichler Clark, Director, EGLE
Mr. Aaron B. Keatley, Chief Deputy Director, EGLE
Mr. Andy Draheim, Chief of Staff, EGLE
Ms. Amy Peterson, EGLE
Ms. Kelly Ploehn, EGLE