



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

October 18, 2018

CERTIFIED MAIL – 7013 0600 0000 1853 7472
RETURN RECEIPT REQUESTED

Major General Leonard Wesley Isabelle
Michigan Air National Guard
Department of Military and Veterans Affairs
3411 N. Martin Luther King Jr. Blvd.
Lansing, Michigan 48906

CERTIFIED MAIL 7013 0600 0000 1854 0021
RETURN RECEIPT REQUESTED

Colonel Bryan J. Teff
Michigan Air National Guard
Headquarters 110th Attack Wing (ACC) (ANG)
3545 Mustang Avenue
Battle Creek, MI 49037-5509

Dear Sirs,

SUBJECT: Compliance Communication Regarding a Release of Per- and Polyfluoroalkyl Substances at the Helmer & Dickman Road Area located at the 3545 Mustang Avenue, Battle Creek, Calhoun County, Michigan; Facility ID No. 13000408.

The Department of Environmental Quality (DEQ) has information indicating environmental contamination is present on the Helmer and Dickman Road Area property located at 3545 Mustang Avenue, Battle Creek, Michigan (Property). The Property is a part of the Battle Creek Air National Guard Base (Base). Subject to Michigan's environmental cleanup law, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), the DEQ considers the Michigan Air National Guard (MIANG) responsible for the contamination.

Earlier this year the DEQ began testing drinking water wells in the Helmer and Dickman Road Area for Per- and Polyfluoroalkyl Substances (PFAS). PFAS compounds include perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS). These substances are commonly found in aqueous film forming foam (AFFF) which was historically used at the Base for fire-fighting and training. The Department of Military and Veterans Affairs (DMVA) was already in the process of testing soil and groundwater on the base for these constituents. While the DMVA was collecting groundwater samples from monitoring wells they had installed on the Base in May 2018, with the permission of the DMVA, the DEQ collected split samples from these wells.

On June 11, 2018, the DEQ received analytical results of the split samples collected from the Base. Results showed the presence of 13 PFAS compounds in the groundwater. The highest results were 21,500 parts per trillion (ppt) PFOA; and 55,500 ppt PFOS. Prior to this work being conducted, the DEQ, pursuant to Part 201, established cleanup criteria for groundwater used for drinking water for PFOA and PFOS. The cleanup criteria established under Part 201 for PFOA and PFOS is 70 ppt either individually or combined, which is consistent with the U.S. Environmental Protection Agency (USEPA) lifetime health advisory. PFOA and PFOS are hazardous substances under Part 201. The concentrations found in the groundwater samples collected at the base confirm that groundwater at the Property is contaminated with hazardous substances above Part 201 criteria.

An area where hazardous substances exceed the criteria for unrestricted residential use is known as a Facility as defined in Part 201, which triggers obligations under the law. The concentration of PFOA and/or PFOS found at the Property makes it a Facility regulated by Part 201, and steps are required to clean up the contamination. Persons who are liable for a Facility pursuant to Section 20126 of Part 201 include persons who owned or operated a facility at the time of the release and are responsible for an activity causing that release. The MIANG's use of AFFF which contained PFAS constituents while it operated the Base was an activity causing a release.

Contamination data at the Property also indicates PFAS has moved beyond the Property into areas where groundwater is currently used for drinking water. As such, numerous residential drinking water wells are threatened, with some having confirmed detections of PFAS above Part 201 criteria.

As a liable party under Section 20126 of Part 201, the MIANG has an affirmative obligation to comply with Section 20114 of Part 201, which lists the requirements of a liable party to address environmental contamination. These steps include, as applicable:

- Immediately taking measures to contain or remove the contamination source;
- Immediately identifying and eliminating any threat of fire or explosion or direct contact hazards;
- Notifying the DEQ and affected neighbors if contamination has migrated off the Property;
- Delineating the extent of the contamination; and
- Undertaking the cleanup of the contamination.

Additional requirements under Section 20114 of Part 201 may apply to this situation.

Pursuant to Section 20114 of Part 201, the DEQ is requesting submittal of a Work Plan and schedule for conducting response activities within 45 days of receipt of this letter to address the PFOA and PFOS contamination at the Helmer and Dickman Road Area facility. Under the provisions of Part 201 Section 20114, the owner or operator of a facility shall diligently pursue response activities necessary to achieve the cleanup criteria. Michigan's standards must be achieved under CERCLA in accordance with Section 121(d), 42 U.S.C. § 9621(d).

The Work Plan activities shall also include but are not limited to the following:

- Regularly monitor existing area residential wells for PFAS to ensure levels in drinking water wells are stable and/or below criteria. DEQ recommends using the USEPA's method 537 Rev. 1.1, September 2009.
- Fully delineate and characterize the PFAS plume(s) caused by the release(s) both on and off-Base. Full delineation is imperative to understanding the movement and risks associated with the PFAS contamination.
- Identification and mitigation of 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.

Finally, the DEQ urges the MIANG to provide an alternate drinking water source to affected well users. We urge this for three principle reasons:

1. Until the plume(s) are fully delineated, there is no certainty that higher-level contamination is not impacting drinking water wells in the vicinity.
2. The wells are impacted with several PFAS for which there is insufficient health-based data to determine toxicity.
3. It is unknown how long and at what concentrations well users have been exposed to these contaminants through their drinking water.

The DEQ is requesting the MIANG to submit the above-referenced Work Plan within 45 days of receipt of this letter to the following address:

Mr. Gregg Brettmann, Project Manager
Kalamazoo District Office
Remediation and Redevelopment Division
Michigan Department of Environmental Quality
7953 Adobe Road
Kalamazoo, Michigan 49009
Telephone: 269-567-3528
Email: BrettmannG@michigan.gov
Fax: 269-567-9440

The DEQ requests that the MIANG take the necessary steps to comply with Part 201. The MIANG may want to confer with an environmental consultant to assist in complying with the provisions of Part 201.

The explanations of Part 201 in this letter should not be considered a complete listing of your legal obligations. The complete Part 201 statute and rules can be found at the DEQ Web site: www.michigan.gov/deq, by clicking on 'Land', 'Remediation', then 'Laws & Rules'.

The information used to prepare this letter is located in the Kalamazoo District Office of DEQ located at 7953 Adobe Road, Kalamazoo, Michigan, 49009. If the MIANG wishes to review this information or if the MIANG has questions regarding this letter, please contact Mr. Gregg Brettmann, Project Manager, at 269-567-3528; or via email at brettmanng@michigan.gov; or you may contact me at the telephone number listed below. If the MIANG wishes to submit any

factual information regarding liability under Part 201 or provide information that will demonstrate the MIANG is in compliance with Part 201, please send it to the address provided above for consideration.

The DEQ looks forward to your continued cooperation in addressing the contamination at the Helmer and Dickman Road Area Facility.

Sincerely,



David Heywood, District Supervisor
Remediation and Redevelopment Division
Kalamazoo District Office
(269) 547-0604
Heywoodd1@michigan.gov

cc: Lt Col. Jim Shay, Director of Personnel/A1, MI ANG
Lt Col. Mark Sitterly, Environmental Manager, MI ANG
Mr. Jonathan Edgerly, Environmental Manager, W NFG (US)
Mr. Eric Pessell, Calhoun County Health Department
Mr. Kevin Green, Calhoun County Health Department
Ms. Carol Isaacs, Governor's Office
Mr. Kory Groetsch, Department of Health and Human Services
Ms. C. Heidi Grether, Director, DEQ
Mr. Aaron B. Keatley, Chief Deputy Director, DEQ
Mr. Scott Dean, Communications Director, DEQ
Mr. Steve Sliver, PFAS Executive Lead, DEQ
Ms. Sue Leeming, RRD Director, DEQ
Ms. Kathy Shirey, RRD Assistant Director, DEQ
Ms. Amy Peterson, DEQ
Mr. David O'Donnell, RRD Field Operations Manager – West, DEQ
Mr. Joshua Mosher, RRD C&E Manager, DEQ
Mr. Gregg Brettmann, Project Manager, DEQ
Ms. Bree Bennett, District Enforcement Coordinator, DEQ