



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON, VA 22204-1373

September 19, 2025

Mr. Mike Neller
Director, Remediation and Redevelopment Division
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
525 West Allegan Street
P.O. Box 30473
Lansing, MI 48909

Dear Mr. Neller:

Thank you for your letter dated August 4, 2025, to Mr. Demian Wincele regarding the Army National Guard (ARNG)'s efforts to address per- and polyfluoroalkyl substances (PFAS) associated with past activities at Camp Grayling. Your letter requests that the ARNG evaluate treatment technologies and perform an Interim Remedial Action (IRA) at Cantonment to prevent PFAS from migrating into Lake Margrethe from the ARNG property. I am responding on his behalf.

The ARNG, as directed by the Army, follows the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to investigate and respond to PFAS releases at Camp Grayling. CERCLA provides a consistent, science-based approach to the investigation and remediation of releases into the environment. The Army is committed to taking interim cleanup actions to protect public health and the environment where site specific information indicates an interim action is warranted. Further, the ARNG remains committed to partnering with Michigan Department of Environment, Great Lakes, and Energy (EGLE) and the community to achieve a cleanup result that stakeholders can be confident is protective and enduring.

As noted in your letter, ARNG implemented two separate removal actions in 2024 and 2025 addressing PFAS impacts at Cantonment. A Non-Time Critical Removal Action (NTCRA) was initiated in 2024 to reduce the amount PFAS entering Lake Margrethe at two storm water outfalls, and work continues to optimize the operation of these systems. In 2025, a Time Critical Removal Action (TCRA) was implemented to provide funding for the construction of a municipal drinking water system expansion. ARNG is contributing \$51.4 million under Environmental Services Cooperative Agreements with Grayling Township to reimburse the Township for construction costs. Connection to the drinking water system constructed with these funds, along with funding from EGLE, will provide a durable, long-term source of drinking water for residents of Grayling Township, including Lake Margrethe. Once completed, ingestion of PFAS-impacted groundwater as drinking water will be eliminated as a route of exposure.

As part of the request for additional remedial actions, your letter identifies several concerns including impacts on fish and potential exposure of residents and recreational users of the Lake to PFAS. The letter asserts that ingestion of soil, groundwater, fish, sediment, and surface water are complete exposure pathways. It references a statement in the USEPA's PFAS National Primary Drinking Water Regulation Factsheet that "maximum contaminant level goals for PFOA and PFOS were set to zero ppt." Upon completion of the underway TCRA, the exposure route will be incomplete for groundwater ingestion as drinking water. Further, a remedial goal for drinking water standards is not equivalent to established cleanup standards and is not consistent with the CERCLA process, which directs agencies to use site-specific data to evaluate the potential risk for each media type. EGLE's own cleanup criteria for groundwater of 8 ppt for PFOA and 16 ppt for PFOS differ from the referenced USEPA factsheet.

The ARNG has consistently collaborated with EGLE staff throughout the investigation of the presence of PFAS at Camp Grayling. At Lake Margrethe, the ARNG has worked with EGLE staff for over a year to develop a robust investigation plan and field activities at the Lake began this month. Data collected from this phase of the investigation will be used in the RI Report to evaluate PFAS in surface water and sediments as well as migration pathways between groundwater plumes and the Lake. Additionally, the RI Report will evaluate the risk to human health and the environment using data published in the USEPA's Integrated Risk Information System (IRIS) which sets national standards for the remediation of hazardous sites. Once the RI phase is completed, the ARNG will have the information necessary to act, as warranted, to reduce risk to human health and the environment by developing site-specific cleanup strategies. Implementation of any IRA prior to the collection of critical data now being collected would lack the site-specific information necessary to ensure the action is successful.

The ARNG appreciates this opportunity to clarify its on-going CERCLA actions at Camp Grayling and, specifically, in and around Lake Margrethe.

If you have any questions or concerns, the point of contact is Lieutenant Colonel
Charlton J. Mosley, Army National Guard, at armyguardcleanup@army.mil or 520 671
6748.

Sincerely,

A handwritten signature in black ink, appearing to read "Brandon J. Bennett". The signature is fluid and cursive, with a prominent loop at the end.

Brandon J. Bennett
Colonel, U.S. Army
Environmental Division Chief, G-9
Army National Guard