



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
REMEDIATION AND REDEVELOPMENT DIVISION



PHILLIP D. ROOS
DIRECTOR

October 29, 2025

VIA EMAIL

Colonel Brandon Bennett, U.S. Army Environmental Division Chief
Army National Guard
111 South George Mason Drive
Arlington, Virginia 22204-1373

Dear Colonel Brandon Bennett:

SUBJECT: Response to the Army National Guard Interim Remedial Action to Address Per- and Polyfluoroalkyl Substances (PFAS) Contamination in Lake Margrethe – Camp Grayling; Grayling, Crawford County, Michigan

Thank you for your response dated September 19, 2025, regarding the Michigan Department of Environment Great Lakes, and Energy's (EGLE) request for the Army National Guard (ARNG) to complete Interim Remedial Actions (IRA) at Areas of Interest (AOI) 14, 15, and 20 to address PFAS migration into Lake Margrethe from the ARNG property. EGLE values the ARNG's commitment following the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Department of Defense (DoD) guidance, along with the commitment to take interim cleanup actions to protect public health and the environment where site-specific information indicates an interim action is warranted. The CERCLA and DoD guidance used to justify EGLE's request was cited in the letter dated August 4, 2025.

EGLE does not agree with the ARNG on whether there is enough information available, prior to the completion of the Remedial Investigation (RI) phase, to ensure an IRA could successfully contain a significant portion of the PFAS groundwater plumes to the ARNG property. The data acquired from the additional sampling effort completed on Lake Margrethe in mid-October 2025, is inconsequential for determining if implementation of an IRA on the ARNG property is necessary and to determine where the most effective locations for an IRA could be. The Cantonment Draft Final RI Report is planned for completion in 2026, and EGLE is unaware of additional sampling mobilizations planned by ARNG in 2026. As EGLE understands, all RI data on the ARNG property deemed necessary to complete the RI Report, including the initial sediment, porewater, and surface water samples, were collected by ARNG by the end of 2024. This data demonstrated the discharge of unacceptable levels of contamination into Lake Margrethe from the ARNG property at AOI 14, 15, and 20.

From EGLE's point of view, the plume with the largest expected impact is AOI 14, which extends roughly 2,500 feet north-northwest from the on-base Fire Barn to Lake Margrethe, impacting off-base residential and recreational areas. The groundwater plume includes concentrations up to 23,300 parts per trillion (ppt) Perfluorooctanesulfonic acid (PFOS), 449 ppt Perfluorohexanesulfonic acid (PFHxS), and 323 ppt Perfluorooctanoic acid (PFOA). This plume is discharging to a public beach, with porewater concentrations up to 43.4 ppt PFOS and 50.5 ppt PFHxS, as documented from sampling efforts led by ARNG in Fall 2024.

As previously cited in the letter dated August 4, 2025, DoD can initiate early and interim remedial actions at any point throughout the CERCLA process¹ for a situation requiring a more immediate response, such as exposure to humans or animals that results in serious threats to public health or environment. Site specific data collected by both the ARNG and EGLE show impacts to Lake Margrethe from the ARNG property, which is posing an unacceptable and on-going threat to public health and the environment.

Uncertainties at the federal level have left EGLE with uncertainties for available robust federal funding and expedited timeline for completion of a final remedial action. In this case, EGLE firmly believes the ARNG has the data and authority to implement an IRA on the ARNG property to minimize further harm to public health and the environment while the CERCLA process continues. As such, EGLE requests the ARNG to perform an IRA at Cantonment AOIs 14, 15, and 20, and to explore various alternative technologies to do so, such as installation of groundwater extraction systems or removal of soil source areas, to prevent a significant portion of PFAS-impacted groundwater from continuing to discharge into Lake Margrethe from the ARNG property.

EGLE appreciates the continued collaboration and partnership with the ARNG during the ongoing CERCLA investigation.

If you need further information or assistance, please contact Mike Neller; Division Director, Remediation and Redevelopment Division (RRD), at 517-512-5859; NellerM@Michigan.gov; or any additional questions can be directed to Summer Cox; Project Manager, Superfund Section, RRD, at CoxS12@Michigan.gov; 517- 275-2805; or you may contact either of them at EGLE, RRD, P.O. Box 30426, Lansing, Michigan 48909-7926.

Sincerely,

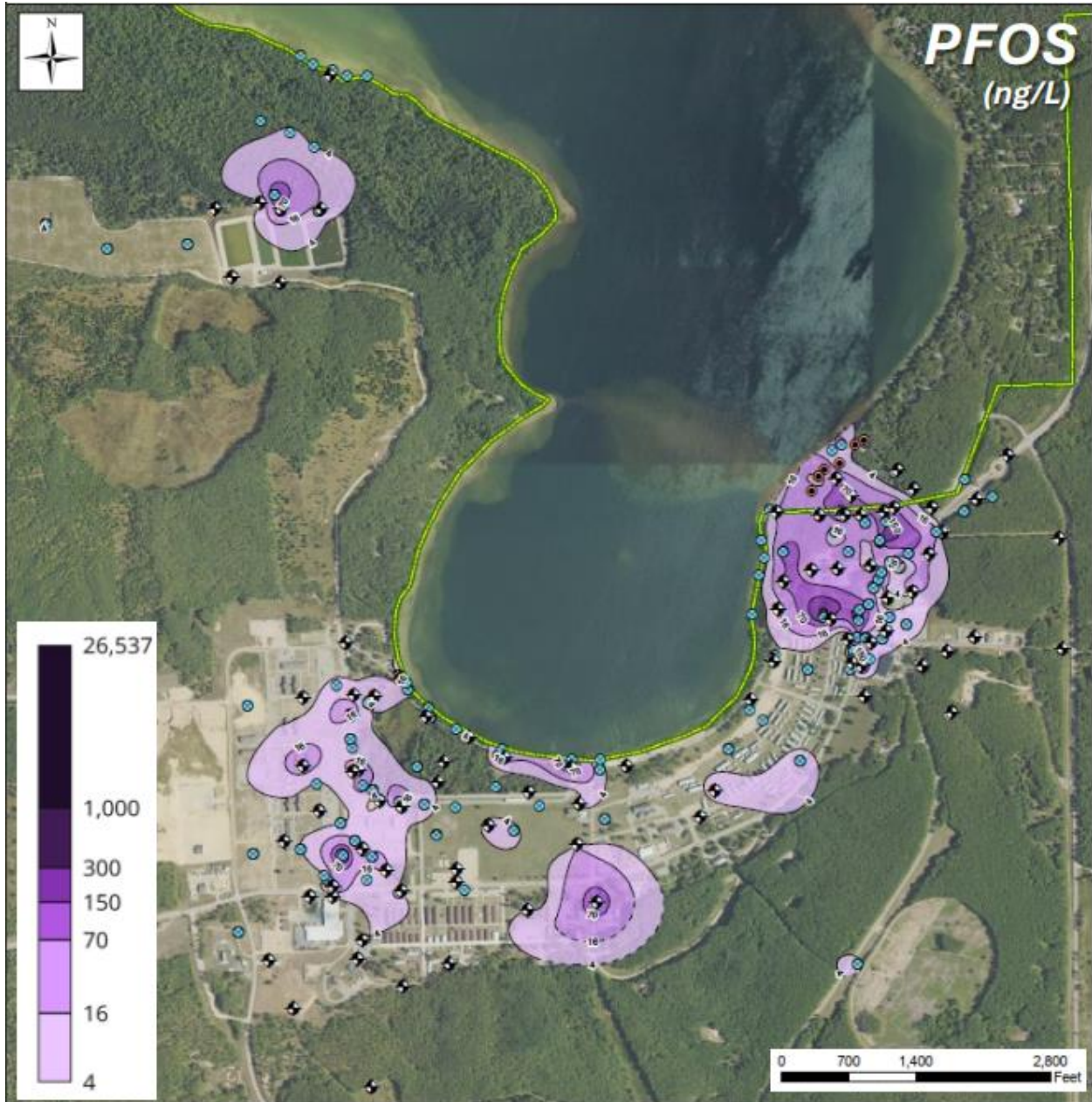


Mike Neller, Director
Remediation and Redevelopment Division
517-512-5859

Attachment

cc/att: Lieutenant Colonel Mosely, ARNG
Walter Gee, ARNG
Demian Wincele, ARNG
Kalan Briggs, EGLE
John Bradley, EGLE
Beth Place, EGLE
Nicholas Shorkey, EGLE
Christiaan Bon, EGLE

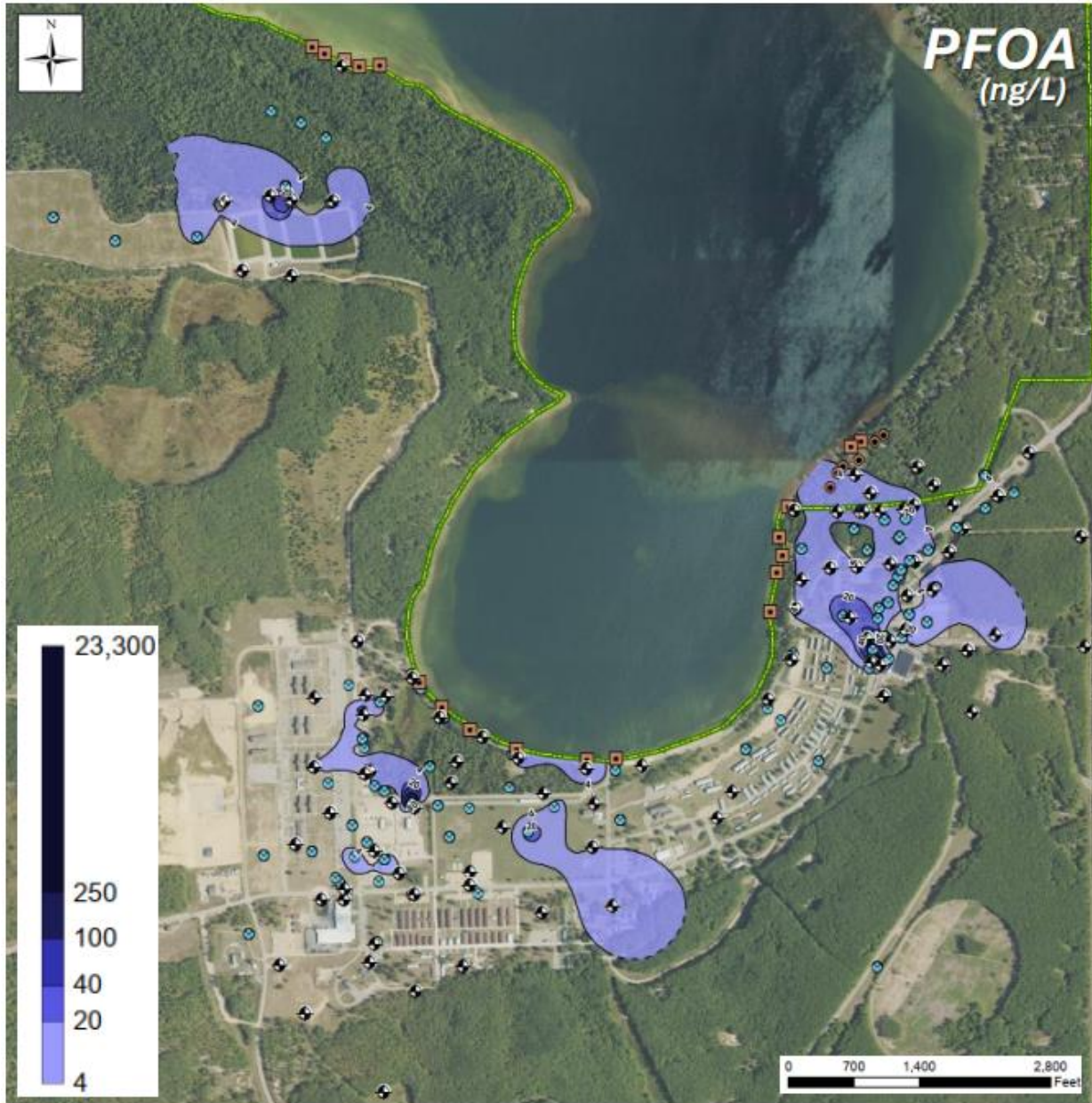
¹ Comprehensive Environmental Response, Compensation, and Liability Act Process;
<https://www.denix.osd.mil/army-pfas/denix-files/sites/11/2022/03/Comprehensive-Environmental-Response-Compensation-and-Liability-Act-Process.pdf>



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-  Facility Boundary
-  Monitoring Well
-  Temporary Monitoring Well
-  Drinking Water Locations
-  Porewater

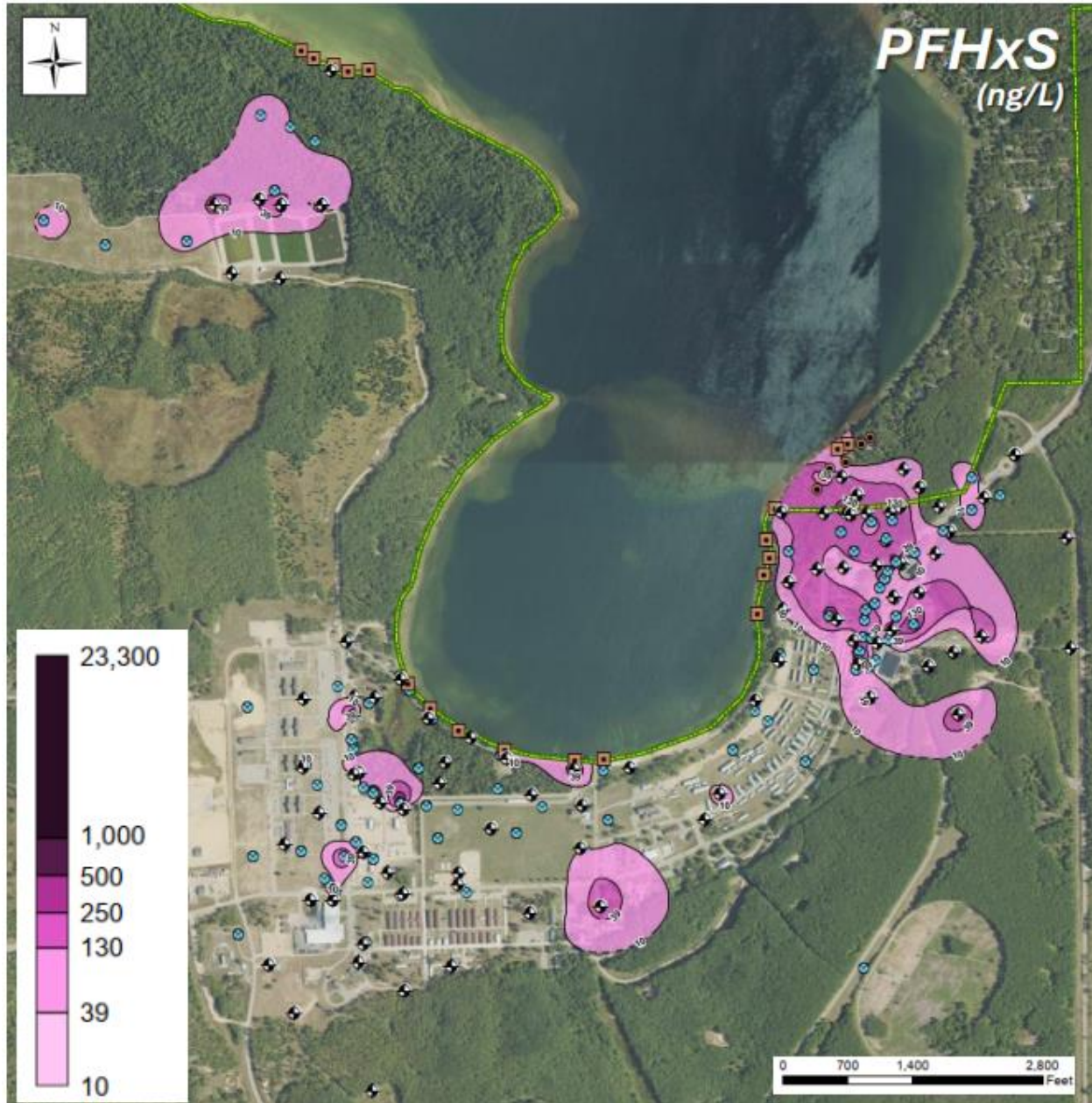
² RAB Presentation Slides; May 2025; https://libguides.kirtland.edu/ld.php?content_id=81298139



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³ RAB Presentation Slides; May 2025; https://libguides.kirtland.edu/ld.php?content_id=81298139



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⁴ RAB Presentation Slides; May 2025; https://libguides.kirtland.edu/ld.php?content_id=81298139



⁵ EGLE Lake Margrethe Surface Water and Pore Water PFAS Investigation Report; April 4, 2023; [Lake Margrethe Surface Water and Pore Water PFAS Investigation Report](#)



⁶ EGLE Lake Margrethe Surface Water and Pore Water PFAS Investigation Report; April 4, 2023; [Lake Margrethe Surface Water and Pore Water PFAS Investigation Report](#)