



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GAYLORD DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 4, 2020

Chairman, Emmet County Board of Commissioners
Mr. William L. Shorter
200 Division Street, Suite G74
Petoskey, Michigan 49770

Dear Mr. Shorter:

SUBJECT: Compliance Communication Regarding the Potential Release of Per- and Poly-fluoroalkyl Substances (PFAS) through use of Firefighting Foam at Pellston Regional Airport, 1351 Highway US-31, Pellston, Michigan 49769

This compliance communication is in response to data from several residential wells, south of the airport, that tested positive for compounds found in aqueous film forming foam (AFFF.) It is our understanding that training with AFFF was performed annually on the airport with the last training event in 2017.

As of January 10, 2018, groundwater criteria for drinking water protection for the hazardous substances perfluorooctanoic acid (PFOA) or perfluorooctane sulfonic acid (PFOS) were established by the Department of Environment, Great Lakes, and Energy (EGLE) under the authority of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). The groundwater criteria for drinking water protection is 0.07 ug/L (70 parts per trillion) for the combined concentrations of PFOA and PFOS. As of March 3, 2020, twelve (12) residential wells tested in the area had concentrations that exceeded the criteria with the highest level detected at 412 parts per trillion PFOA+PFOS.

EGLE believes the impacts to these residential wells are from your use of AFFF and requests that you to submit the following.

- A workplan and timeline to investigate potential PFAS contamination at all locations on the Pellston Regional Airport where AFFF has been used including, but not limited to, vertical aquifer sampling of groundwater, soil sampling, permanent monitoring well installation (includes locations), potential receptor evaluation and map(s) / figure(s) of all proposed sampling locations.
- Maps / figures containing the locations on the Pellston Regional Airport where AFFF has been used.
- Map(s) / figure(s) showing projected surface water drainage areas or routes and outfalls for all locations during all time periods of AFFF use.
- Map(s) / figure(s) of current Pellston Regional Airport surface water drainage areas, features (basins, sub-basins and other systems) and outfalls.

Please provide this information by April 4, 2020. This information should be provided to:

Christiaan Bon, Project Manager
Gaylord District Office
Remediation and Redevelopment Division
Department of Environment, Great Lakes, and Energy
2100 West M-32
Gaylord Michigan 49735
Telephone: 989-370-9624; Email: bonc@michigan.gov

Liable parties under Section 20126 of Part 201 have responsibility for an affirmative obligation to comply with Section 20114 of Part 201, which lists the requirements of a liable party to address environmental contamination. EGLE requests that Emmet County take the necessary steps to comply with Part 201.

The explanations of Part 201 in this letter should not be considered a complete list. The Part 201 statute and rules can be found in its entirety at the EGLE Web site: www.michigan.gov/egle, by clicking on 'Land', 'Land Remediation & Redevelopment', then 'Site Investigation and Remediation'.

If you have questions regarding this letter, please contact the Project Manager, Christiaan Bon, or you may contact me at the telephone number listed below. EGLE looks forward to your cooperation.

Sincerely,



Randall L. Rothe, District Supervisor
Remediation and Redevelopment Division
Gaylord District Office
989-217-0083
rother@michigan.gov

cc: Mr. Michael Reeves, Acting Emmet County Administrator
Mr. Scott Kendzierski, Northwest Michigan Health Department
Ms. Lisa Fischer, DHHS
Mr. Steve Sliver, MPART
Ms. Josh Mosher, Assistant Director, EGLE
Ms. Mary Miller, Field Operations Section Chief, EGLE
Mr. Dan Rockafellow, EGLE
Mr. Christiaan Bon, EGLE