



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYER  
DIRECTOR

November 3, 2017

Mr. Ben Marrs  
BRAC Environmental Coordinator  
United States Department of the Air Force  
Air Force Civil Engineer Center  
9801 Reese Boulevard North, Suite 300  
Lubbock, Texas 49416-2107

Dear Mr. Marrs:

**SUBJECT:** Former Wurtsmith Air Force Base  
Substantive Requirements Document (SRD) for Arrow Street Pump and Treat System, Benzene Plant Pump and Treat System, and Mission Street Pump and Treat System

The purpose of this letter is to highlight the need for the installation of treatment per the Substantive Requirements Document (SRD) MIU990027 for the Arrow Street, Benzene Plant and Mission Street pump and treat systems (PTS) to address perfluorinated chemical (PFC) contamination.

In 2014, the Michigan Department of Environmental Quality (MDEQ) acknowledged the requests by the Air Force (AF) to bypass the air stripper towers at the Arrow Street, Benzene Plant, and Mission Street treatment systems. This acknowledgment was supported by data provided by the AF indicating that treatment for the original pollutants of concern, Volatile Organic Compounds, was no longer necessary nor cost effective. As indicated in discussions at that time, it was understood that the AF would continue making progress to determine the necessary treatment for emerging pollutants to adequately protect waters of the state.

Since 2014, the MDEQ has participated in many discussions with the AF, particularly Mr. David Strainge and Ms. Debra MacDonald, about future treatment needs regarding PFCs at the base. Those discussions outlined the MDEQ's concerns regarding known and suspected PFCs present on the base and the possible effects on public health and several surface waters of the state. Those discussions, and the data and treatment technology information provided, resulted in two Substantive Requirement Documents (SRD): SRD MIU990034 (WAFB FT-02 Groundwater Pump and Treat System) and SRD MIU990027 (Benzene Plant, Mission Street, and Arrow Street Pump and Treat Systems).

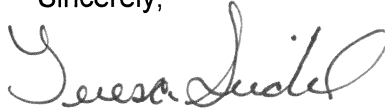
The SRD MIU990027 specifically outlined the MDEQ's expectation that the AF would move forward with installing the appropriate treatment system(s) necessary to address several pollutants, including known PFCs. Parts I.A.1.f., I.A.2.f., and I.A.3.f. of the SRD state that the AF will provide multi-stage activated carbon treatment, or another treatment methodology which will achieve the discharge limitations by December 31, 2017. Any slippage past the December 31, 2017, date is a violation of the issued SRD. It is the understanding of the MDEQ Water Resources Division (WRD) that the installation of the appropriate treatment system(s) is currently behind schedule and treatment will not be operating prior to the December 31, 2017 due date. It is our intention to address any delay through compliance or enforcement documents that require compliance as soon as possible. To this end, the MDEQ is requesting

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that the AF design and install temporary multi-stage activated carbon treatment systems at each location, until the permanent treatment system(s) are installed and operational.

The MDEQ, Water Resources Division, will continue to work with the Air Force on meeting their important environmental controls at the Wurtsmith Air Force base. If you have any concerns or questions, please feel free to contact me.

Sincerely,



Teresa Seidel, Director  
Water Resources Division  
517-284-5470

cc: General Joseph L. Lengyel, Chief, National Guard Bureau  
Major General Gregory Vadnais, Director and Adjutant General, Department of Military  
and Veterans Affairs  
Dr. Stephen TerMaath, Air Force Civil Engineer Center  
Ms. Paula Bond, P.G., Aerostar SES, LLC  
Mr. Mike Zimmer, Governor's Office  
Ms. C. Heidi Grether, Director, MDEQ  
Ms. Susan Leeming, External Relations Deputy Director, MDEQ  
Mr. Michael McClellan, Environment Deputy Director, MDEQ