



DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER
JOINT BASE SAN ANTONIO LACKLAND TEXAS

12 July 2021

AFCEC/CIBC
2261 Hughes Avenue, Ste 155
JBSA Lackland, TX 78236-9853

Ms. Beth Place
Geology and Defense Site Management Unit
Superfund Section, Remediation and Redevelopment Division
525 West Allegan Street
P.O. Box 30473
Lansing, MI 48909-7973

RE: Proposed Plan for Interim Remedial Action, Van Etten Lake at Ken Ratliff Memorial Park
Former Wurtsmith Air Force Base (WAFB), Oscoda Michigan

Dear Ms. Place:

As the Michigan Department of Environment, Great Lakes, and Energy (EGLE) is aware, the Air Force is conducting response actions at the former WAFB pursuant to our lead agency authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Consistent with CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), EGLE is the state support agency, and provides review and comment on key components of CERCLA response actions.

As part of CERCLA response actions at former WAFB, the Air Force has proposed an interim remedial action (IRA) to hydraulically control the migration of perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) contaminated groundwater into Van Etten Lake at Ken Ratliff Memorial Park. The Air Force believes this proposed IRA is consistent with EGLE's January 31, 2020 letter which, among other things, requested that action be taken to prevent the migration of per- and polyfluoroalkyl substances (PFAS) contaminated groundwater from Aqueous Film Forming Foam Areas 1 and 15 into Van Etten Lake in the vicinity of Air Force Beach [Ken Ratliff Memorial Park] as a priority.

As EGLE is aware, the first step in the CERCLA remedy selection process is for the lead agency to identify the alternative that best meets the requirements of the NCP at 40 CFR § 300.430 – Remedial Investigation/Feasibility Study and Selection of Remedy, and present that alternative to the public in a proposed plan which briefly describes the remedial alternatives analyzed by the lead agency, proposes a preferred remedial action alternative, and summarizes the information relied upon to select the preferred alternative.

The Air Force first submitted the draft proposed plan for the Van Etten Lake IRA to EGLE for review and comment on March 15, 2021. The Air Force responded to EGLE comments dated March 31, 2021 on the proposed plan on April 15, 2021 and held a teleconference with EGLE to attempt to resolve EGLE's comments on April 19, 2021. Following this teleconference, the Air Force withdrew the draft Van Etten Lake IRA proposed plan and submitted a revised proposed plan on May 19, 2021 which clarified that the IRA was intended to address PFOS/PFOA contaminated groundwater migrating into Van Etten Lake at Ken Ratliff Memorial Park. The revised proposed plan changed the naming convention of the proposed IRA to make it more clear to EGLE and the public that the IRA was intended to address a

specific area of Van Etten Lake. The revised proposed plan also included updated figures, but the remedial alternatives being evaluated did not materially change from the original draft submitted to EGLE on March 15, 2021. EGLE provided comments on the revised proposed plan on June 4, 2021 and Air Force submitted responses to EGLE on June 29, 2021. The Air Force has now received additional comments from EGLE dated July 7, 2021.

While the Air Force and EGLE have both worked cooperatively to resolve differences of opinion regarding the proposed plan, despite almost four months of negotiations, the Air Force and EGLE seem to be at an impasse. EGLE's July 7, 2021 comments continue to repeat comments which the Air Force has previously answered; request information which the Air Forces had indicated will be provided in the remedial action work plan; requests revisions to the proposed plan which are beyond the scope of the proposed plan; and are new or additive. The Air Force remains convinced that the preferred alternative, hydraulic control with expanded treatment via granular activated carbon represents the best alternative to address PFOS/PFOA contaminated groundwater migrating to Van Etten Lake at Ken Ratliff Memorial Park.

There are a number of steps in the CERCLA process that remain before the construction of the IRA can begin, not the least of which is making the final proposed plan available for public review and a 30-day public comment period. Therefore, in order to avoid potentially delaying IRA construction beyond the Fall of 2021, the Air Force needs to proceed with making the final proposed plan available for public review and comment. As such, and consistent with the NCP at 40 CFR § 300.430 (see Proposed Plan) and Section 2.2.4 of the USEPA guidance document titled A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents (EPA 540-R-98-031, July 1999), the Air Force requests within 10 working days of the date of this letter EGLE provide a letter regarding the Van Etten Lake at Ken Ratliff Memorial Park proposed plan and preferred alternative which indicates one of the following: 1) agreement, with or without comments; 2) disagreement, with or without comments; or 3) no comment on the proposed plan at this time. Any major outstanding EGLE comments and the Air Force responses to those comments will be summarized in the final proposed plan when it is made available to the public for review and comment.

I look forward to continuing to work with you to advance the environmental restoration program at the former WAFB.

Sincerely,

CATHARINE VARLEY, PHD, APDP III, DAF
BRAC Program Management Division
Air Force Civil Engineer Center (AFCEC/CIBC)

cc:

Mr. Dan Medina, AFCEC/CIBC
Mr. Dave Kline, EGLE
Mr. John Bradley, EGLE