RAB Questions

18 April 2018 Wurtsmith RAB meeting

Requests/Comments:

Will the Air Force consider additional interim actions permitted within CERCLA?

Interim remedial actions or removal actions are options at any point during the CERCLA process if there is a determination of an imminent or substantial endangerment to human health or the environment. The Air Force will evaluate the need for interim or removal actions as it works through the CERCLA process.

2. Did the Air Force look into the claims about runway foaming and other potential release areas? What did you find?

The AF recently has talked with some of the individuals who provided historical accounts regarding foam that may not have been considered during the preliminary assessment (PA). The Air Force is evaluating that information.

3. Can the Air Force take any lessons learned from Wurtsmith to improve the thoroughness of preliminary assessments?

The Air Force continues to have confidence in the diligent efforts made to assess potential AFFF release sites decades after firefighting and base operations ceased at Wurtsmith. With a focus on protecting human health, the CERCLA process considers newly discovered information throughout each stage of the investigation.

4. What is the Air Force decision on the AFFF release near the high school? Does the Air Force take responsibility? Who will investigate this release? Who will pay for an alternate drinking water supply for the private well above HA?

The Air Force does not have proof that Air Force actions contaminated drinking water wells near the high school. It is the Air Force's understanding that Oscoda Township applied for a U.S. Department of Agriculture water line grant for the private well at issue. The Air Force recommends you direct further questions to Oscoda Township.

5. Did the Air Force have fire response boats on the AuSable River in case of a crash on Lake Huron? If so, shouldn't that be investigated as a potential source?

The AF does not have credible information that boats with AFFF were staged at the DNR boat launch. The data MDEQ gathered at the boat launch is consistent with other PFOS/PFOA data in the proximity of the boat launch area, and which MDEQ has stated is related to a source(s) other than the AF. The information provided stated the firefighting boats in question may have been used during the WWII era. This was long before the Air Force began using AFFF in 1970.

6. Is Clark's Marsh included in the Air Force study area or not? If so, why do we not yet understand the nature of contamination?

Yes Clark's March is a part of the Air Force study as it is downgradient from the former Fire Training Area. In 2015, the Air Force installed a groundwater treatment system at the former fire training area to mitigate impact to Clarks Marsh. The Air Force's Supplemental Site Inspection work includes further investigation of the area.

7. How will additional DoD restoration funding be used at Wurtsmith?

Wurtsmith will compete for Environmental Restoration Program (ERP) funding along with the other 40 BRAC bases. No Air Force sites received additional ERP funding in Fiscal Year 2018 (FY18) beyond the original FY18 allocation.

8. What's the latest on the dispute resolution?

The dispute resolution process is ongoing. The supplemental site inspection (SSI) presentation on 6 June will address some of the SSI objectives negotiated as a result of the dispute resolution.

9. What's being done to prevent contamination from Clark's Marsh from reaching the AuSable River?

The groundwater recovery system and the associated GAC treatment plant installed at FT-02 intercepts and treats the vast majority of PFOS/PFOA-contaminated groundwater before reaching Clark's Marsh and the AuSable River.

10. How can you not know if the GAC Treatment System will treat to the 12 ppt standard?

11. The new GAC treatment system is goal is to treat the groundwater to non-detect prior to discharge, and we have been successful doing that elsewhere. Our experience with similar types of systems has shown that treatment of PFOS to ND is easily achievable. We will evaluate the effectiveness of the Arrow/Benzene Pump & Treat System GAC treatment process on an ongoing basis. When will the latest SSI work plan be available to the public?

The SSI work plan will be available once MDEQ and the AF have agreed to it. The AF will present the latest SSI objectives, agreed on by the AF and MDEQ, during the June 6, 2018, RAB meeting.

12. Why doesn't the Air Force include MDEQ data in reports, maps and presentations? Wouldn't a comprehensive map with all data be best?

The AF uses approved, controlled methods to gather its data. However, MDEQ data is reviewed and evaluated as screening data for guiding AF work. The vast majority of MDEQ data has been gathered in AF wells simultaneous with AF sampling, so the AF already has data for a majority of the same locations.

13. Please provide a timeline for follow-on actions. When can we expect the RI phase to begin?

In accordance with CERCLA, at the conclusion of the SSI the USAF will determine whether further action is warranted. Final remedial actions will be determined under the CERCLA process and these typically come after a remedial investigation (RI), including risk assessments, and feasibility study (FS) are completed. No timeline exists for entering that phase.