



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 12, 2019

VIA E-MAIL and U.S. MAIL

Mr. Bryan Wagoner, Environment & Sustainability Director
Wayne County Airport Authority
1 L.C. Smith Building, Mezzanine Level
Detroit, Michigan 48242

Dear Mr. Wagoner:

SUBJECT: National Pollutant Discharge Elimination System (NPDES)
Storm Water General Permit No.: MIS420032
Designated Name: Willow Run Airport

In 2018, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Water Resources Division (WRD), Surface Water Assessment Section (SWAS) conducted ambient stream monitoring in the Huron River and its associated tributaries. The monitoring was conducted due to the statewide, multi-agency effort to determine the levels of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in waters of the state. Follow-up sampling occurred in 2019 to further identify potential sources of PFAS-containing chemicals in the watershed. As a result of ambient stream monitoring in waters of the state, EGLE staff have started the process of evaluating facilities that use, manufacture, or have the potential historical use of PFAS-containing chemicals, with the goal of protecting surface water quality.

On April 30, 2019, surface water samples were collected from Willow Run Creek. Results of the ambient stream monitoring performed by EGLE SWAS staff indicate that Willow Run Creek has elevated levels of PFAS. Michigan has developed Rule 57, Water Quality Standards for both perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA). For PFOS, the Human Non-Cancer Value (HNV) is 11 parts per trillion (ppt) in surface water used as a source of drinking water, and 12 ppt for those waters not used as a drinking water source. The HNV for PFOA is 420 ppt and 12,000 ppt for drinking water and non-drinking water, respectively.

Of the samples collected from Willow Run Creek, two sampling locations near Willow Run Airport exceeded water quality standards for PFOS. One sample was collected from the main stem of Willow Run Creek at the southwest outfall for the main drainage areas at Willow Run Airport (Outfall 002). The second location was from Willow Run Creek at the Service Drive, downstream of Willow Run Airport Outfalls 007, 001, 002a, 002, and 003. Please refer to the table below for the results of the testing conducted by EGLE. Based on these results, EGLE staff are assessing potential sources from Willow Run Airport that may have contributed to the elevated levels of PFAS in Willow Run Creek.

Sample Location	Sample Date	PFOS Level Detected	PFOS Water Quality Standard (Non-Drinking)	PFOA Level Detected	PFOA Water Quality Standard (Non-Drinking)

Outfall 002	4/29/19	92 ppt	12 ppt	6.1 ppt	12,000 ppt
Willow Run Creek at Service Drive*	4/29/19	33 ppt	12 ppt	3.8 ppt	12,000 ppt
		32 ppt		5.8 ppt	

*Sample location includes replicate sample

Required Action

Based upon the historical use of PFAS-containing chemicals at airports, and the proximity of the Willow Run Airport to Willow Run Creek, EGLE is requiring that Willow Run Airport perform PFAS sampling at each storm water discharge point. A Short-Term Storm Water Characterization Study (STSWCS) plan shall be submitted to WRD for review and approval. The STSWCS template available on the EGLE Industrial Storm Water webpage (identified below) should be used to ensure all plan requirements are met. For this STSWCS, EGLE requests that the sampling effort includes at least two wet weather events and two dry weather events, if it is determined that groundwater infiltrates the storm sewer system.


The enclosed document provides the minimum list of required analytes that Willow Run Airport must provide laboratory sample results for. Additionally, all sampling shall be performed in accordance with the sampling guidance provided on the Michigan PFAS Action Response Team webpage <https://www.michigan.gov/pfasresponse/>.

Willow Run Airport shall submit a response to this letter via MiWaters no later than **August 15, 2019**. At a minimum, the response shall include:

1. A STSWCS plan for WRD approval.
2. The laboratory that will be hired to analyze the storm water samples for all required PFAS analytes and the methodology that will be used to analyze the samples.
3. Information regarding the onsite use of Aqueous Film-Forming Foam (AFFF), including:
 - a. Brand name(s) or type(s) of AFFF employed, including formulation/ingredients. If multiple types of AFFF have been employed, provide the dates for each.
 - b. Date and location of any use (e.g. to prevent, extinguish or control fires, to test firefighting equipment, and/or historical firefighting training exercises)
 - c. Maintenance and testing procedures

We look forward to working with Willow Run Airport to evaluate solutions to this challenge. Should you require further information regarding this letter, or if you would like to arrange a meeting to discuss it, please contact Maya Faber at faberm@michigan.gov; or 248-497-2244.

Sincerely,


Melinda Steffler
District Supervisor
Water Resources Division
Warren District Office

Willow Run Airport

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Enclosure: *EGLE PFAS Minimum Laboratory Analytes List*

cc: Mr. Jon Russell, EGLE, WRD
Ms. Amy Peterson, EGLE, MPART
Ms. Tracy Kecskemeti, EGLE, MMD
Mr. Paul Owens, EGLE, RRD
Ms. Cheryl Wilson, EGLE, RRD
Mr. Kevin Lund, EGLE, RRD
Ms. Maya Faber, EGLE, WRD