



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

January 16, 2018

CERTIFIED MAIL: 7011 1570 0001 9652 3129

Mr. Benjamin Marrs, PG, REM  
BRAC Program Management Division  
United States Department of the Air Force  
Air Force Civil Engineer Center  
Building 1, 3515 South General McMullin Avenue  
San Antonio, Texas 78226

Dear Mr. Marrs:

SUBJECT: Violation Notice No. VN-007964  
Substantive Requirements Document (SRD) No. MIU990027  
Designated Name: USAF-Wurtsmith AFB

The Michigan Department of Environmental Quality (MDEQ), Water Resources Division (WRD), has determined that the United States Department of the Air Force (USAF)-Wurtsmith Air Force Base (AFB) is in violation of Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.3101 *et seq.*, and the administrative rules promulgated thereunder being 2006 AACRS R 323.2101 *et seq.*, as amended; and SRD No. MIU990027, which was signed October 7, 2016.

As you are aware, the USAF-Wurtsmith AFB was required, by December 31, 2017, to have provided multi-stage activated carbon treatment, or another treatment methodology, on groundwater pumped from the existing Arrow Street and Benzene Plant pump and treat systems for purpose of remediation of per- and polyfluoroalkyl substances (PFAS). The need to comply with the SRD was previously discussed in letters from Ms. Christine Alexander, WRD, dated August 2, 2017, and Ms. Teresa Seidel, WRD, dated November 3, 2017. The letters specifically identified the need to install the treatment systems and rejected a request by the USAF to rescind SRD No. MIU990027. To date, no such treatment system has been installed.

The MDEQ appreciated the face-to-face meeting with you on December 5, 2017, and the telephone conversation our Lansing WRD staff had with you and Mr. Stephen Termaath on January 2, 2018. Those conversations were helpful in understanding the overall plan and timing for a central treatment facility that will include the existing Arrow Street and Benzene Plant treatment systems with flows of 500 gallons per minute (gpm) and an expected project completion of July 2018. We understand the central treatment system will be designed in a manner that allows for expansion and will incorporate the Mission Street facility and additional contaminated groundwater flows up to 1,000 gpm.

The violations identified in this Violation Notice are violations of Part 31 of the NREPA and SRD No. MIU990027. The USAF-Wurtsmith AFB should continue to take immediate action to achieve and maintain compliance with the terms and conditions of Part 31 and the SRD.

Mr. Benjamin Marrs  
Page 2  
January 16, 2018

Please submit a response to this letter by January 31, 2018. At a minimum, the response shall include:

1. Submit final construction drawings by March 1, 2018.
2. Commence construction by March 15, 2018.
3. Complete construction and initiate treatment operation by July 15, 2018.
4. The central treatment system shall be operational by August 1, 2018. If the central treatment system is not operational by August 1, 2018, the USAF-Wurtsmith AFB shall install a temporary treatment system prior to this date for the Arrow Street and Benzene Plant pump and treat systems.
5. The USAF-Wurtsmith AFB shall provide updated details, including written monthly status reports regarding the time frame and installation of the central treatment system that was discussed with the MDEQ.

If you have any factual information you would like us to consider regarding the violations identified in this Violation Notice, please provide them with your written response.

We appreciate your cooperation in resolving this matter. Should you require further information regarding this Violation Notice or if you would like to arrange a meeting to discuss it, please contact me at [silerm@michigan.gov](mailto:silerm@michigan.gov); or 989-439-3461.

Sincerely,



Matthew Siler  
Saginaw Bay District Office  
Water Resources Division

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. Sue Leeming, External Relations Deputy Director, MDEQ  
Mr. Michael McClellan, Environment Deputy Director, MDEQ  
Ms. Teresa Seidel, MDEQ