

NOW NEED OUR WATER

February 9, 2023

VIA E-MAIL

Senator Gary Peters
Hart Senate Office Building
Suite 724
Washington, DC 20510

Dear Senator Peters:

We write today on behalf of the people, veterans, and families negatively affected by widespread PFAS contamination at the former Wurtsmith Air Force Base in Oscoda, Michigan to ask for your assistance in working with the U.S. Air Force (USAF) and the Department of Defense (DOD) to implement actions that will help to stop the continuous, imminent and substantial exposures to PFAS chemicals that are harming human health and the environment. In particular, we request that you strongly urge the DOD to implement additional Interim Remedial Actions (or IRAs) in four distinct contaminated areas as identified by highly credible and experienced technical experts, including two former Michigan Department of Environmental Quality (now EGLE) scientists.

Given the imminent and substantial threats to human health and the environment caused by the contamination, and to maximize the effectiveness of the ongoing cleanup process, it is critical that the Department of Defense immediately implement four additional Interim Remedial Actions at the following locations: (1) Wastewater Lagoons and Seepage Beds (WWTP) near Clark's Marsh, (2) Three Pipes Drain, (3) the area designated as "DRMO," and (4) Landfills 30 and 31. A map showing the existing plumes and locations of the four requested Interim Remedial Actions, together with a brief written summary, is attached to this letter.

The threat from PFAS contamination at Wurtsmith is well documented and there is strong community support (inside and outside of Oscoda) for the four additional Interim Remedial Actions. State and local health departments have issued five, separate public health warnings for PFAS due to the Wurtsmith contamination, ranging from drinking water in the "zone of concern" ... to Do Not Eat warnings for fish, small game, and venison ... to an "Avoid Contact" warning with contaminated foam on Van Etten Lake and elsewhere. Unsafe fish and game pose a huge burden for low-income families that rely on hunting and fishing for their next meal. In addition,

the contamination at two sites – DRMO and Landfills 30/31 – present an imminent and substantial threat to the youth camp owned and operated by the YMCA of Metropolitan Detroit. Action to address these plumes is consistent with the Biden Administration’s commitment to tackling environmental injustices in underserved and overburdened communities.

Despite compelling evidence showing immediate Interim Remedial Actions are warranted (and long overdue) in these four areas, the DOD has refused to pursue the requested Interim Remedial Actions. Overall, we are very concerned that DOD continues to deny, delay, and downplay its responsibility to protect human health and the environment at Wurtsmith. It took strong, repeated, sustained intervention from Michigan Congressional Delegation Members for the DOD to launch two existing Interim Remedial Actions at Wurtsmith. Your continued involvement will be instrumental in advancing progress toward a better cleanup outcome, and save resources and human lives in the process.

We respectfully request that your office assist the local community by urging the USAF and DOD to reconsider and implement additional Interim Remedial Actions in those four identified locations in order to halt the continued spread and exposure of toxic PFAS contamination. Please contact Bentley Johnson (at bentley@michiganlcv.org) for additional information, including a full briefing if needed.

Thank you for considering this request and for working to stop further migration and exposure of this harmful and dangerous contamination.

Very truly yours,

**NEED OUR WATER (NOW) -
OSCODA, MICHIGAN**

Cathy Wusterbarth, Co-Leader

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Kyle Jones, Legal/Technical Advisor

cc: Governor Gretchen Whitmer
Mr. Mike Neller, EGLE RRD
Ms. Beth Place, EGLE
Oscoda Township Board of Trustees
Oscoda Township Superintendent

Summary Overview: Four Requested Interim Remedial Action Sites at the former Wurtsmith Air Force Base, Oscoda, Michigan

1. Wastewater Lagoons and Seepage Beds (WWTP)

The use of the Wastewater Lagoons and Seepage Beds by the Air Force created a major source of PFAS contamination (a) in soils in the seepage bed and lagoon areas; (b) in groundwater as plumes that enter Clarks Marsh and the swamp east of Clarks Marsh; (c) in creeks in the area that empty into the Au Sable River and the Au Sable River; which result in widespread contamination of sediment; surface water in the wetlands, streams and the Au Sable River and ultimately the Lake Huron. This extensive contamination has, in conjunction with contamination entering Clarks Marsh from the fire training area FT-02 and crash site OT-16, resulted in “Do Not Eat” advisories from the Michigan Department of Health and Human Services (“MDHHS”) for fish and wild game including deer for all areas and waters mentioned.

It should be noted that the high-level contamination found in the area of the lagoons and seepage beds resulted from direct discharge to the lagoons of used PFAS contaminated firefighting water from fire training area FT02.

Groundwater contamination of PFOS and PFOA over a linear width of 1800 ft is above 1000 ppt ranging up to 3251 ppt. Additionally, streams that drain the swamp into the Au Sable River south of the lagoons have surface water PFOS concentrations in excess of 4600 ppt. These waters are contaminated well above the State’s 12 ppt protection of surface water criteria. PFAS in groundwater is also discharging from the same area as the discharges of these streams into the Au Sable River. Over a thousand-foot-wide plume of PFAS contaminated (above criteria) groundwater originating at the waste lagoons and seepage beds, discharges into the Au Sable River.

This plume is responsible for the contamination of fish in the Au Sable River and Clark’s Marsh, and an interim remedial action (IRA) to stop the continuing release of PFAS from this source area should be implemented immediately.

2. Three Pipes Drain

The source area of the Three Pipes Drain groundwater contamination has been detected as high as 71,400 ppt PFOS and 2220 ppt PFOA. Surface water concentrations at the head of Three Pipes Drain which is an expression of groundwater has been measured at 890 ppt. Surface water is thus highly contaminated, continuous discharge from this source area. This plume also is responsible for the contamination of fish in the Au Sable River, which is the subject of the MDHHS “Do Not Eat” fish advisory.

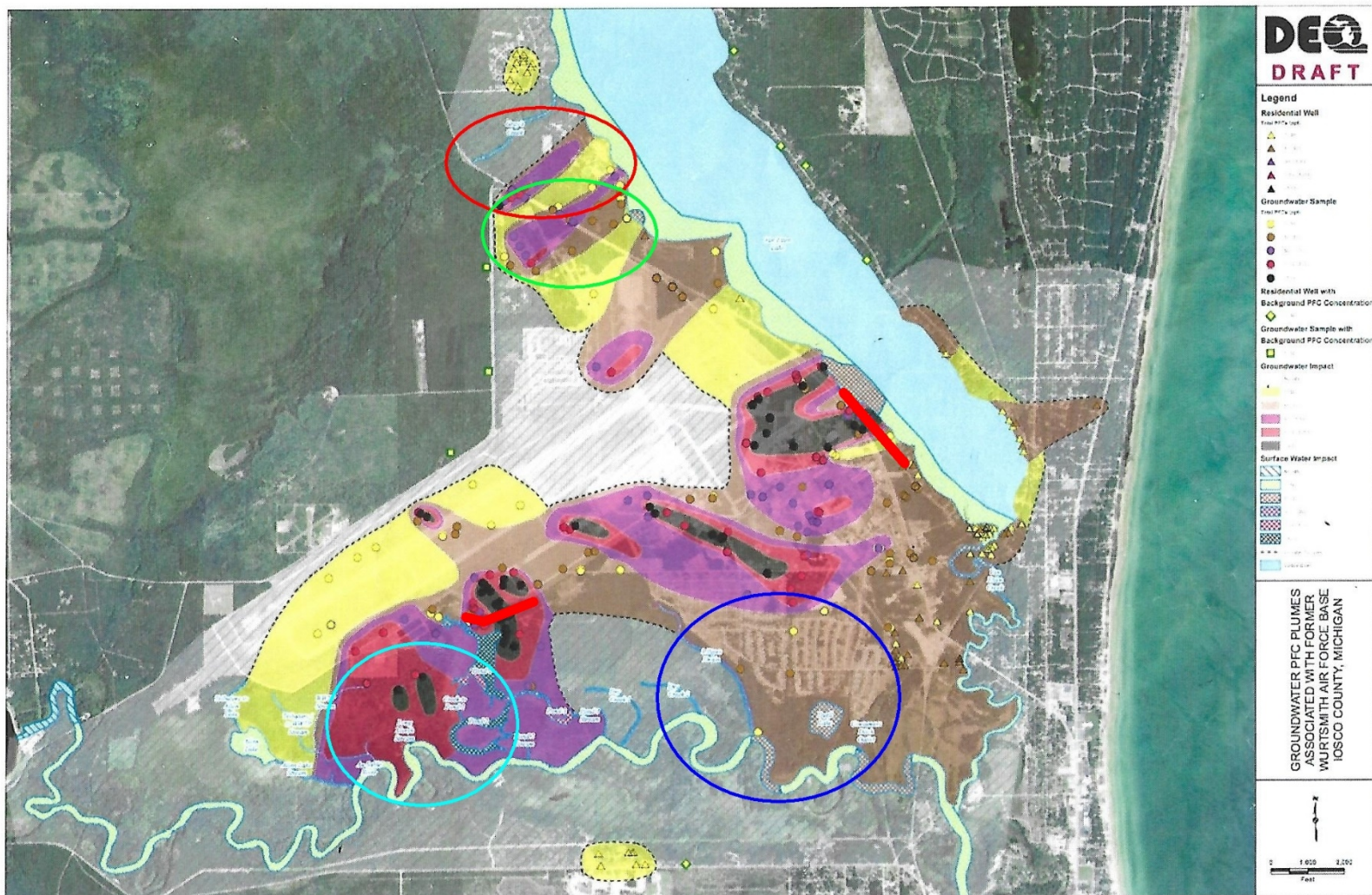
3. Landfills LF-30 & 31

These landfills have created highly complex plumes as mixed waste from the operations of the base and residential wastes were disposed in these landfills for decades. Currently there

is a groundwater extraction system that partially captures this plume and discharges it into an engineered wetland. The groundwater extraction system does not capture all of the PFAS contamination emanating from the landfills and the wetland is incapable of removing the PFAS from the leachate. The Air Force is compelled by law to address this situation. The plumes currently discharge to the beaches of the youth camp owned operated by the YMCA of Metropolitan Detroit, and contribute to the PFAS contaminated foam on Van Etten Lake, which is the subject of the MDHHS “Avoid Contact” health advisory. This plume is also adding to the contamination of the fish in Van Etten Lake.

4. DRMO

Also known as OT-45, DRMO groundwater contamination by PFAS has been measured at 74,100 ppt PFOS and 3520 ppt PFOA. This high-level contamination, that ultimately vents to Van Etten Lake, is clearly a controllable point source. This plume is impacting the YMCA camp, as well as Van Etten Lake fish, and is adding to the conditions that are creating PFAS contaminated foam on the lake, which is the subject of the MDHHS “Avoid Contact” health advisory.



○ DRMO
 ○ LF30-31
 ○ 3-Pipes
 ○ WWTP
 — Existing Congressionally Motivated IRA's