



P.O. Box 583 • Grayling, Michigan

VIA EMAIL

February 15, 2024

The Honorable Brendan Owens
Assistant Secretary of Defense for Energy, Installations, and Environment
3010 Defense Pentagon
Washington, DC 20301-3010

Michael Price
Senior Deputy Director of State Operations and Director of Strategic Planning
Michigan Department of Military and Veterans Affairs
3411 N. Martin Luther King Jr. Blvd.
Lansing, Michigan 49006-2934

Dear Assistant Secretary Owens and Colonel Price,

On behalf of more than 375 Lake Margrethe Property Owners in Michigan, I am writing to request more urgency by your staffs to address our PFAS contamination. The military caused the contamination in our drinking water and lake, and you have the authority to remediate the environmental crisis. We were delighted to see Assistant Secretary Owens' February 6, 2024 announcement of 30 PFAS Interim Actions nationwide, including one for Lake Margrethe. Based on that announcement, our confidence in the DoD has increased. Mr. Price, we are writing you because you signed the most recent response letter to us on January 25, 2024. While many of our questions remained unanswered in your response, we are asking once again today that you push harder at the state level for more aggressive timelines in the PFAS cleanup process.

Clean Drinking Water for Lake Margrethe Residents:

Our No. 1 priority in the PFAS Cleanup effort is to get the residents on and around Lake Margrethe safe drinking water and we've heard Dr. Bonnie Packer say that human health is the No. 1 priority for the military as well. We were encouraged at the December 4 RAB meeting when Dr. Packer announced it was making the Drinking Water issue an Interim Action. However, that specific Interim Action was not included on the list of 30 PFAS Interim Actions announced on February 6 by you, Assistant Secretary Owens. We were very disappointed to see this, and we are asking today that it be added to the list for FY 2024.

We understand that the ARNG and DMVA have been meeting with Grayling Township about installing a municipal water line. Due to Grayling Township's great leadership, that line will provide clean water to two of five areas in Grayling affected by the PFAS contamination. Unfortunately, the township does not have funding for Areas 4 and 5 where Lake Margrethe owners reside. While the military participants

have been attending the township meetings, it appears they have made no commitment to financially support the effort. A cooperative agreement needs to be signed by the ARNG and Grayling Township as soon as possible and adequate funding is needed to move the municipal water system forward. We ask that you accelerate the timelines to accomplish those two tasks so that the municipal line doesn't have to stop short of providing safe, non-PFAS contaminated drinking water to Lake Margrethe residents.

Well Water Testing and Drinking Water Standards:

There are two DoD policies that we would like the DoD to change. We believe Assistant Secretary Owens can put those changes in motion.

1. To date, the DoD will not accept well water testing results from any other organization. Unfortunately, the responsible DoD organization in Grayling is slow to gather results. For many residents, they learn from a state organization that their water is contaminated and then they wait years for the DoD to complete its own testing. We believe the DoD should use the state generated data, as it provides bonified accurate results that could expediate remediation plans.
2. We encourage the DoD to step up today and plan accordingly to remediate to the new EPA proposed safe drinking water standard of 4 ppt that will likely be finalized this year. We were told at the February 6 RAB meeting that until the standard is made official and all lawsuits are settled, the DoD will continue to work with the 70 ppt drinking water advisory. Since the EPA and DoD are both Federal organizations, we don't see how any lawsuits would affect the DoD's responsibility to proactively manage toward the new standard. The EPA sets the Federal standards and the DoD has an obligation to meet those Federal standards.

The DoD's decision to wait until the "dust settles" on the new EPA standards makes no sense because the number of households with unsafe drinking water will increase exponentially as soon as the new standards go into effect. Why would the military waste time working on remediation plans that won't address the new tighter standards? That sounds like doing the same job twice.

At the February 6 RAB meeting, Patricia Lyman of the DMVA told us that "the promulgation of proposed EPA MCL would likely result in greater than 100 additional houses requiring filters and the logistics of monitoring and maintaining 100 filter systems would be extremely challenging... that's why it's such a good idea to use the municipal system." This is another reason why we need the military's expedited support in bringing the municipal line to Lake Margrethe residents.

Storm Water Drains in Cantonment Area (most recently referred to as Surface Water Creeks)

We were pleased to see that the list of 30 Interim Actions announced by you, Assistant Secretary Owens, on February 6 included the Camp Grayling – Cantonment project. This Interim project was announced to us at the September RAB meeting and as residents on the lake, we assumed that the military would address the full scope of the contamination in that area. There are two storm drains depositing PFAS contaminated water into the lake, but ever since September, the DMVA has consistently noted that it will address "at least one location, potentially two."

The DMVA has been found in violation by the Michigan Department of Environment, Great Lakes and Energy (EGLE) of the NPDES permits for both point sources. In addition, EGLE ordered the DMVA to resolve the violations in their July 25, 2022 letter. Hence, we ask that the DoD find a way to remediate both of those storm drains at the same time. For our assurance that both storm drains are being addressed, we request to see the contracts and engineering remediation plans. In addition, we request the military's project plans, including milestones and target dates.

Groudwater Flow towards Borcher's Way and Shallow Water Flow into Lake Margrethe

During the December 4 RAB meeting, we learned about a new source area by an old incinerator in the cantonment area. We also learned that contaminated water under that incinerator is flowing toward Borcher's Way homes and into Lake Margrethe through the shallow ground water. Dr. Packer told us that "this site is going to move along with the rest of the cantonment area site to the remedial investigation phase." While we are saddened about yet another source of contamination, we are even more upset that the only actions planned for this new source of contaminated water is "more testing." We want to know when the military will take action to stop the flow of PFAS toward our homes and into our lake.

The residents on and around Lake Margrethe have been aware of the PFAS contamination caused by Camp Grayling for over seven years now. The scope of the contamination continues to grow and yet, as of today, we've seen no action to remediate the problem. We are asking you to raise the level of urgency around the PFAS disaster at Lake Margrethe and expedite plans to protect the health of our neighbors, our wildlife and the environment we call home.

Regards,



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