

## STATE OF MICHIGAN

## DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY





February 19, 2020

Mr. Kevin Klein, Manager Cherry Capital Airport 727 Fly Don't Drive Traverse City, Michigan 49686

Dear Mr. Klein:

SUBJECT: Part 201 Information Request Pertaining to the Use of Firefighting Foam

at the Cherry Capital Airport, Traverse City, Grand Traverse County

Site Identification Number: 28000004

The Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division, has information that the Cherry Capital Airport in Traverse City, Michigan (Site) is required to use firefighting foam as part of routine fire protection and that firefighting exercises are performed for safety purposes. Certain types of firefighting foam (e.g., aqueous film forming foam or AFFF) contain per- and polyfluoroalkyl substances (PFAS) and, more specifically, the hazardous substances perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS). Spills or releases of PFAS to the environment can result in groundwater contamination.

The Grand Traverse County Health Department has identified at least 20 shallow residential wells north of the Site. (See the enclosed map). Grand Traverse Bay is also located approximately one mile north of the Site. The residential wells and Grand Traverse Bay could be at risk from PFAS releases that may have occurred.

As of January 10, 2018, groundwater criteria for drinking water protection for PFOA and PFOS were established by EGLE under the authority of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). The groundwater criteria for drinking water protection is 70 ng/l (parts per trillion) for the combined concentrations of PFOA and PFOS. The surface water criteria for PFOA is 12,000 ng/l and PFOS is 11 ng/l.

Section 20117(1) of the NREPA provides that EGLE may require a person to furnish information related to:

- a) The identification, nature, and quantity of materials that have been generated, treated, stored, handled, or disposed of at, or transported to, a facility.
- b) The nature or extent of a release or threatened release at or from a facility.

Pursuant to the NREPA, EGLE is seeking information related to the use of PFAS-containing substances from the Cherry Capital Airport:

1) Was PFAS-containing firefighting foam used for training purposes or other fire suppression purposes at the Site?

- 2) During what period was PFAS-containing firefighting foam used, and at what frequency (e.g., quarterly, annually)?
- 3) In what location was PFAS-containing firefighting foam used at the Site?
- 4) At what location was/is PFAS-containing firefighting foam stored at the Site? Is there any evidence of a release of foam to the environment from the storage location?

Currently, there are monitor wells at the Cherry Capital Airport that were installed to address a leaking underground storage tank which was adjacent to the former fire, crash, and rescue building. This building may have stored or used PFAS. These monitor wells may serve useful in sampling for PFAS.

EGLE is requesting that the Cherry Capital Airport provide responses to the questions above within 14 days of receipt of this letter. If information provided by Cherry Capital Airport indicates the likely release of PFOA or PFOS to the environment at levels above the established Part 201 criteria, EGLE will request that a workplan be submitted describing proposed actions to define the nature and extent of PFOA/PFOS contamination and to conduct response activities as necessary to protect the public health and the environment.

If you have further questions or concern, please contact Ms. Ann Emington, Project Manager, at 231-876-4453; at emingtona@michigan.gov; or you may contact me.

Sincerely,

Steven Kitler

District Supervisor
Cadillac District Office

Remediation and Redevelopment Division

231-876-4455

kitlers@michigan.gov

## sk/ae/tl Enclosure

cc: Mr. Daniel Thorell, Grand Traverse County Health Department

Mr. Michael Neller, EGLE

Mr. Joshua Mosher, EGLE

Mr. David O'Donnell, EGLE

Mr. Dan Rockafellow, EGLE

Ms. Ann Emington, EGLE

