In the Matter Of:

WURTSMITH RESTORATION ADVISORY BOARD

RAB MEETING

May 15, 2024



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6	WURTSMITH RESTORATION
7	ADVISORY BOARD (RAB) MEETING
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10	Oscoda United Methodist Church
11	120 West Dwight Street, Oscoda, Michigan 48750
12	Wednesday, May 15, 2024
13	5:00 p.m.
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20	Marcy A. Klingshirn, CER 6924 Certified Electronic Recorder
21	Esquire Deposition Solutions
22	Firm Registration Number 8035
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1	RAB CO-CHAIRS:	Mark Henry (virtual) Steven Willis, Air Force
2		Steven Willis, Air Force
3	Local Government Stakeholder RAB Members Present:	
4		Denise Bryan, Local Health Department Chelsea Gary, MDHHS Amy Handley, EGLE
5		Michael Munson, OWAA Bill Palmer, Oscoda Township
6		Eric Strayer, AuSable Township
7	Community RAB Members Present:	Dave Carmona
8		William Gaines Arnie Leriche
9		Scott Lingo Greg Schulz
10		Josh Sutton Rex Vaughn (virtual)
11		David Winn Cathy Wusterbarth
12	Also Present	Amy Rauser, Jessie Howard, Cyndi Abbott,
13	(In Person):	Christine Alexander, Janet Anderson, Megan Berry, Matt Boltusis, Paula Bond,
14 15		Kalan Briggs, Tarek Buckmaster, Summer Cox, Beverly Green, John Janiak, David Kane, Andrea Keatley, Travis Kirin,
16		Tammy Kline, Tisha Lane, Matt Lipiec, Kelly Lively, Ryan Marish, Wendi
17		Michael, Jeremiah Morse, Barry Nelson, Grace Poudrier, Kirby Tyndall, Roger
18		Walton, Lynn Winn
19	Also Present (Virtually):	Amanda Armbruster, Dorin Bogdan, Grace Borst, Cheryl Brewer, Michelle Brown,
20		Courtney Carigan, Kevin Cox, Courtney Fung, Greg Gaines, Greg Gangnuss, Jenny Haglund, Cristina Harvey, Kenneth
21		Heitkamp, Teresa Homsi, Stephanie Kammer, James Kountzman, Mathew Lipiec,
22		Mollie Miller, James Mills, Tess Nelkie, Rob Pallarito, Natalia Perez, Ravi
23		Ravichandran, Jim Romer, Sydney Ruhala, Matt Siler, Erin Simpson, Tony Spaniola,
24		Hannah Theodorovich, Aneta Veedmont, Nathan Wayne, Mark Weegar
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Oscoda, Michigan 1 2 Wednesday, May 15, 2024 - 5:00 p.m. 3 MS. JESSIE HOWARD: Hello, everyone. Here we go. 4 Hello, everyone, and welcome to the May 15th, 2024, 5 Restoration Advisory Board public meeting. I'm your facilitator, Jessie Howard. Irving Entertainment Studios 6 7 will be live streaming and documenting tonight's meeting. 8 And we are also joined by our certified court reporter Marcy 9 who also will be documenting. I just want to give a quick reminder to the RAB to remember to speak right into the end 10 11 of those microphones, the round piece there, and be sure to 12 say your name clearly for people attending virtually. And 13 also real quick for the RAB members, I do have out a copy of 14 the presentation and there is also a copy of the AIs. 15 top packet are the open ones and the bottom packet are the 16 closed ones. So you do have all those as well. And before 17 we begin, I just want to mention that our typical Community 18 co-chair Mr. Mark Henry is not with us tonight, but we do 19 have Mr. Greg Schulz in his place. And with that, I would 20 like to give our co-chairs the floor for their opening 21 remarks. Mr. Willis? 22 MR. STEVE WILLIS: Good evening. This is Steve 23 Willis with the Air Force. Welcome, everyone. I see a 24 couple of new faces. It's always nice to see new folks here

interested in the restoration activities we've got going at



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Wurtsmith. We've got a full agenda tonight. We've got a fairly lengthy presentation on the risk assessment process that we'll be using for the PFAS remedial investigation and we've also got an update on some of the recent RI work which is pretty well wrapped up at this point. And so welcome, everyone, and look forward to a good meeting.

MS. JESSIE HOWARD: Okay.

MR. GREG SCHULZ: I, too, would like to thank everyone for coming. We had a, a real good tech session yesterday that went over the environmental and health, ecological risk assessment, and it's certainly a pretty complicated matter. So with that I will say that C-RAB members have been working on some thoughts on some simple low cost capture absence we might be able to use in Clark's Marsh, particularly the -- where it outflows to the AuSable River, and hopefully we'll have something to present maybe as soon as the next RAB to help move along some remedial -- I guess remedial, interim remedial removal of PFAS where the low-hanging fruit is. So with that I guess ready to go.

MS. JESSIE HOWARD: Okay. Next I will take RAB member attendance. And our RAB coordinator in the back, Amy, will respond for anybody who is joining us virtually. I'll begin with the Government RAB. Steven Willis with the U.S. Air Force?

MR. STEVE WILLIS: Present.



1	MS. JESSIE HOWARD: Tim Cummings, Oscoda Township?
2	MR. BILL PALMER: Bill Palmer sitting in for Steve
3	(sic).
4	MS. JESSIE HOWARD: Thank you, Bill. Eric
5	Strayer, AuSable Township?
6	MR. ERIC STRAYER: Present.
7	MS. JESSIE HOWARD: Amy Handley, from EGLE?
8	MS. AMY HANDLEY: Present.
9	MS. JESSIE HOWARD: Michael Munson from OWAA?
LO	MR. MICHAEL MUNSON: Present.
L1	MS. JESSIE HOWARD: Denise Bryan, District Health
L2	#4? No Denise tonight. And Chelsea Gary, from
L3	Department Michigan Department of Public Health?
L4	MS. CHELSEA GARY: Present.
L5	MS. JESSIE HOWARD: And Jessica Stuntebeck with
L6	the USDA Forest Service?
L7	MS. AMY RAUSER: No.
18	MS. JESSIE HOWARD: No Jessica tonight? Okay.
L9	Moving on to the Community RAB. Greg Schulz?
20	MR. GREG SCHULZ: Present.
21	MS. JESSIE HOWARD: Mark Henry?
22	MR. MARK HENRY: Here virtually.
23	MS. JESSIE HOWARD: Thank you, Mark. Dave
24	Carmona?
25	MR. DAVE CARMONA: Here.



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1 MS. JESSIE HOWARD: Bill Gaines? 2 MR. BILL GAINES: Here. 3 MS. JESSIE HOWARD: Kyle Jones? No Kyle tonight. 4 Arnie Leriche? 5 MR. ARNIE LERICHE: Here. 6 MS. JESSIE HOWARD: Scott Lingo? 7 MR. SCOTT LINGO: Here. 8 MS. JESSIE HOWARD: Josh Sutton? 9 MR. JOSH SUTTON: Here. 10 MS. JESSIE HOWARD: Rex Vaughn? 11 MR. REX VAUGHN: Present virtually. 12 MS. JESSIE HOWARD: Thank you. David Winn? 13 MR. DAVID WINN: Here. 14 MS. JESSIE HOWARD: And Cathy Wusterbarth? 15 MS. CATHY WUSTERBARTH: Here. 16 MS. JESSIE HOWARD: All right. Thank you. Next I 17 will quickly review tonight's agenda. We're currently in 18 the Welcome and Introductions. Next we will have RAB Member 19 Updates followed by the RAB Business Update. We'll then 20 have an update on the PFAS RI and the Alert Area Aircraft 21 Then we will have an update on Risk Assessment IRA. 22 Methodology and Species included in the Ecological Risk 23 Assessment, followed by RAB Member Questions, Public 24 Comment, and then the Conclusion of tonight's meeting. 25 At this time I would like to ask any local, state,



- Air Force or DOD officials if they would please introduce 1 2 themselves if they're here with us or virtually. 3 MR. ROGER WALTON: Good evening. Roger Walton. 4 I'm the central branch chief BRAC program for Air Force. 5 Steve's supervisor. Position previously held by Dan Medina. 6 You may remember him from the past. 7 MS. JESSIE HOWARD: Thank you, sir. Did we have 8 anybody else with us virtually or --9 MR. KALAN BRIGGS: Kalan Briggs, Superfund section 10 manager. 11 MS. JESSIE HOWARD: Thank you. And virtually? MR. MATT SILER: This is Matt Siler with Water 12 13 Resources Division of the Bay City District Office. 14 MS. JESSIE HOWARD: Thank you. 15 MS. CHRISTINE ALEXANDER: Christine Alexander, 16 Michigan Department of Environment, Great Lakes --17 MS. ERIN SIMPSON: This is Erin Simpson. I'm 18 contract support for the Air Force joining virtually. 19 MS. JESSIE HOWARD: Thank you. MS. CHRISTINE ALEXANDER: Christine Alexander with 20
- 21 the Michigan Department of Great Lakes -22 MR. KEVIN COX: This is Kevin Cox from Water
- 23 Resources Division of EGLE, also participating virtually.
- MS. JESSIE HOWARD: Thank you. He's bringing you a microphone.



1	MS. STEPHANIE KAMMER: This is Stephanie Kammer
2	with the Water Resources Division participating virtually.
3	MS. JESSIE HOWARD: Thank you.
4	MS. SYDNEY RUHALA: This is Sydney Ruhala with the
5	Water Resources Division with EGLE, also participating
6	virtually.
7	MS. JESSIE HOWARD: Thank you.
8	MS. AMANDA ARMBRUSTER: Amanda Armbruster with the
9	Remediation and Redevelopment Division of EGLE participating
10	virtually.
11	MS. JESSIE HOWARD: Could you please repeat your
12	name for us? We didn't catch the first part.
13	MS. AMANDA ARMBRUSTER: Amanda Armbruster.
14	MS. JESSIE HOWARD: Thanks, Amanda. And we have
15	one here with us in the room.
16	MS. CHRISTINE ALEXANDER: Christine Alexander with
17	EGLE, Water Resources Division.
18	MS. JESSIE HOWARD: Thank you.
19	MR. TAREK BUCKMASTER: And Tarek Buckmaster, EGLE,
20	Water Resources Division.
21	MS. JESSIE HOWARD: Thank you.
22	MS. MEGAN BERRY: Megan Berry, RRD, EGLE, Bay City
23	District Office.
24	MS. ANDREA KEATLEY: Andrea Keatley, Michigan
25	Department of Health and Human Services.



1	MS. JESSIE HOWARD: Thank you.
2	MS. SUMMER COX: Summer Cox, Michigan Department
3	of Health and Human Services.
4	MS. JESSIE HOWARD: Thank you.
5	MS. COURTNEY FUNG: This is Courtney Fung with the
6	Remediation and Redevelopment Division of EGLE participating
7	virtually.
8	MS. JESSIE HOWARD: Thank you. Anybody else?
9	MR. JAMES KOUNTZMAN: This is Jim Kountzman. I'm
10	with Cherokee Federal supporting the Air Force and I'm
11	virtual.
12	MS. JESSIE HOWARD: Thank you.
13	MS. HANNAH THEODOROVICH: Hannah Theodorovich,
14	Michigan Department of Health and Human Services.
15	MS. JESSIE HOWARD: Thank you.
16	MR. DORIN BOGDAN: Dorin Bogdan. I'm with AECOM
17	Consultants supporting EGLE, virtually.
18	MS. JESSIE HOWARD: Thank you.
19	MR. KENNETH HEITKAMP: Kenneth Heitkamp with EGLE
20	and RRD attending virtually.
21	(RAB Member updates at 5:09 p.m.)
22	MS. JESSIE HOWARD: Thank you. Okay. So before
23	we begin our RAB member updates I do just need to ask that
24	everybody please use this time only for updates. We will
25	have time to answer questions, concerns, things like that



1 later, but for this portion we just need to stick to updates 2 only. And if we could keep them to three minutes or less, 3 that would really help us keep things moving along tonight. We want to be respectful of everybody's time. So we will 4 begin with an update from the Air Force. Mr. Willis? 5 6 MR. STEVE WILLIS: Next slide. There we go. So 7 just a quick update on the -- we're doing a Military 8 Munitions Response Remedial investigation. We briefed this 9 at a RAB probably a year ago. Our plan is to start field 10 work the end of this month or early next month. We're 11 continuing to finalize the QAPP to start that field work. 12 We have a vapor intrusion remedial investigation that's 13 ongoing. We've briefed that at a couple of RABs now. We've 14 collected the third quarter of sub-slab and indoor air 15 samples. Those are at the lab. We're waiting for results 16 to come back from the lab. Once they're validated, we'll 17 share those with the airport, their tenants, EGLE and the 18 Health Department. So more to come as we get those results 19 back. We did have a tech session prior to the last RAB 20 meeting on the 20th of February and our contractor WSP did 21 do a presentation on the FT02 treatment system performance. 22 We did also have a tech session yesterday and our risk 23 assessors went through a, a much lengthier presentation in 24 more detail on the risk assessment process for both human 25 health and ecological receptors. Tonight's version of it



will be a streamlined version, just based on the amount of time we've got available. We are in the process of, of identifying data gaps for our follow-on data gap investigation. That will be part of the, the data gap investigation feasibility study, proposed plan and RODs for the final remedies for the, for the PFAS investigation. We are working with EGLE to identify those. We still need the, the RI report to be written and I expect to have that from the contractor in July time frame. So once we've got that, that'll serve as a good basis for identifying and finalizing our data gaps so we can get that on contract and my plan at this point is to award a contract in January of '25. And the next slide?

Just outlines the, the next four RAB meetings. I try and project out basically 12 months at a time just for planning purpose so everyone can mark it on their calendar. And the RAB meetings are typically the third Wednesday of these -- of February, May, August and November. We make some fluctuations based on holidays. I know last year we made an adjustment for the start of hunting season, just to make sure we had enough attendees, but minor deviations. But this is the general schedule, it's the third Wednesday of those months. And next slide I think gets over to Amy with EGLE.

MS. AMY HANDLEY: Good evening, everybody. I'm



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just going to run through some of the recent activities that EGLE has been up to. We can go to the next slide.

So in March we participated in the base realignment and closure cleanup team meetings which are the BCT meetings. Those minutes have been made available and they were just posted on the MPART web site. I believe they went live on Friday. We also received the second guarter vapor pin and indoor air data related to the VI immediate work plan. We've been in ongoing discussions with MDHHS on the approach and expectations related to that VI work. We've reviewed the fourth five-year review and provided comments to the Air Force as well as the draft MMRP OAPP. We submitted that back to the Air Force with comments as There was also a, a systematic project planning meeting for this MMRP work. It kind of just goes over what was in the QAPP and what the anticipated work is going to happen out here. So we did that back in I think, I believe that was actually April 1st we had that meeting. So we completed a back check of the comments for the PFAS RI QAPP addendum and that document has since been finalized and will be available on the administrative record soon. I believe it was just finalized a couple weeks ago so you should see that soon on the administrative record. We've also been working with our Water Resources Division and our Attorney General's Office for the Aircraft Alert Area IRA substantive



requirements document and the applicable or relevant and appropriate requirements list that we have to submit to the Air Force. All of those things will be finalized and submitted to the Air Force by the end of next week. We can move to the next slide.

So these are some upcoming activities that we have. Again, these are just some of them. It's not everything, but just to give everyone an idea of what we have coming up. We're finishing our -- or we're starting our data review of all of the PFAS IRA work. All of that data has been provided to us apart from the recent monitoring wells that were sampled. There were 91 monitoring wells sampled, I believe, in the last week or two and that stuff is currently with the lab. So once that is validated and finalized we will have that as well. We have a BCT meeting next week and we will be covering an upcoming ESTCP project that is going to be occurring out here at Wurtsmith.

We still have additional VI immediate work plan data that we'll be getting throughout the rest of this year which we'll continue to review and discuss with MDHHS on all that. And we've actually been collaborating with the local health department district office staff within RRD and MDHHS staff on possible solutions for homes that are currently on municipal water but still have an active well, so what

options may be available for well abandonment. We're still in very early stages of that to figure out what options might be available, but we are having some discussions on what we might be able to do to kind of assist with that.

We've also been gearing up to be able to work with the Air Force for the data gap investigation and how we're going to be working with them on putting together stuff for the -- which data gaps we see and how that RI data kind of, what we have found that might be a gap or what work we might want to see within that work plan. We're expecting to be able to have our early internal conversations about that RI data in early June, and then move on to being able to start conversations with the Air Force shortly after that. So then we have a couple of additional documents that we should be getting between now and likely our next RAB meeting. The Aircraft Alert Area interim record of decision and the work plan, the SS-72 revised feasibility study, along with the next long term management and the pump and treat system reports.

And that is it for updates on activities from us.

Next up is actually going to be Tarek Buckmaster from WRD to give a quick update and kind of an overview of how the substantive requirements documents are kind of put together. And he will be able to take a couple questions once he finishes with his presentation. So I will turn it over to



1 | him to begin.

MS. JESSIE HOWARD: Okay.

MR. STEVE WILLIS: While Tarek's coming up, just -- this presentation is in response to an action item from the RAB. There was a request for WRD to provide some discussion of SRDs and the process in general. So this is based on an action item from the RAB.

MR. TAREK BUCKMASTER: Hello, everyone. Again, my name is Tarek Buckmaster and I supervise the Industrial Permits Unit, Permits Section on Water Resource Division.

Our Permits Unit is responsible for issuing NPDES permits and SRDs for all the industrial facilities in the state and all the groundwater remediation sites in the state. I myself have been in Permit Section in Water Resource Division for 25 years. I have been involved with permits the entire time, issuing permits for similar type discharges as at the Wurtsmith site. I have been involved with activities at Wurtsmith since about 2008 and have been involved in the SRD development for all the treatment systems at the site. So I have extensive background in all the SRDs in place currently and all the treatment systems.

Next slide.

So today I'm just going to give a brief overview for the SRD development for the treatment systems at the site and I'm just going to briefly touch on the role of



Water Resource Division, the overview of the treatment systems, the development of the SRD with the evaluations and monitoring requirements involved, and then just some example treatment results from the central treatment system. Next slide.

So Water Resource Division, we cover a wide range of activities in the state. We ensure the designated uses are being met in the surface waters, we administer the discharge permit program, we do water quality assessment and we manage a permit program for surface water interface, inland lakes and streams activities, and we make 9,000 permit decisions per year. Next slide.

So at the this site, the role of Water Resources
Division, the Great Lakes Watersheds Assessment,
Restoration, and Management Section is responsible for
surface water assessment and fish collection and assessment.
Permit Section is responsible for the development of the
SRDs, and the Bay City District Office and our Emergent
Pollutant Section are going to be responsible for compliance
and enforcement of the SRDs at the site. Next slide.

So, again, a brief overview of the treatment systems. There's three active treatment systems at the site for FT02, Central, and Mission Street and the fourth treatment system at the Alert Aircraft Area will be active by the end of the year. All three of the existing sites are



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effectively treating for PFAS, and our monitoring being conducted for the sites in line with the SRDs has demonstrated that all the systems are in compliance with the requirements of the SRD. Next slide.

So when Permit Section develops the SRD, we primarily conduct reviews in two areas: water quality and technology. For the water quality side we're looking at site specific limits based upon the discharge meeting water quality standards for the waters of the state, and the treatment technology side, we evaluate whether EPA has promulgated any effluent limitation guidelines which are the federal minimum level of industry-specific standards for industry. EPA has not promulgated groundwater remediation quidelines for PFAS-specific remediation quidelines. So in the absence of having federal guidelines, the state is required to establish best professional judgment technologybased limits. Those are state based, statewide uniform developed -- uniformly developed standards that we are applicable for any groundwater remediation, especially for PFAS remediation in this area. Again, we have those limits developed. Those are applicable for any remediation that involves PFAS in the state. And then when we do this evaluation when setting our final effluent limitations in the SRD, we always select the most restrictive limitation. Next slide.



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So just some examples of the evaluations that we've done historically for the treatment systems at this site. Water Resource Division has developed standards for a number of PFOS analytes. PFOS and PFOA are identified up here. PFOA has actually been revised to be more restrictive. Instead of the 12,000 nanograms per liter it is 170 nanograms per liter, 66 if it's a drinking water supply. We also have recently established standards for PFBS, PFHxS and PFNA. So the applicable standards that we consider for water quality for, like, for PFOS, it's 12 nanograms per liter as a non-drinking water supply and 11 nanograms per liter if it was a drinking water source. We compare those to the best professional judgment developed technology-based limits. For PFOS that's 15 nanograms per liter as a daily maximum, for PFOA it's 40 nanograms per liter. We have 250 for PFBS and we're currently working on standards for the other analytes. Next slide.

Also, in consideration of the Alert Aircraft Area treatment system, since it will have a groundwater infiltration discharge, we are evaluating it for the maximum contaminant level compliance for groundwater protection and those standards are listed there. Again, for PFOS it's 16 nanograms per liter and for PFOA it's 8 nanograms per liter. And, again, when we are setting the applicable limits in the SRDs, the most restrictive limitation is specified. Next



1 slide.

So this slide just shows a basic setup for how the SRD would include some monitoring requirements for the PFOS analytes. Just the important things are we set up monitoring requirements on a regular basis at the influent monitoring point, any intermediate monitoring stages and the effluent from the treatment system to monitor the operation of the treatment system and also to ensure compliance with the standards at the discharge location. Next slide.

This is an example treatment system. This is the central treatment system that has three -- they're granulated activated carbon units. So as the wastewater flows from right to left, the influent enters that first tank which is often considered to be a sacrificial carbon tank, it passes through the first intermediate stage into the second carbon tank, passes through the second intermediate stage and into the third carbon tank where it's fully treated and then discharged. Next slide.

This last slide is just the, some example monitoring results from that central treatment system. On the bottom axis the dates aren't important, but you can look at the time of passage for this. So the entire treatment system evaluation that is on this page is 160 days. It's approximately the lifespan of the carbon unit before it is changed and rotated. As you can see, the orange line at the



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top is the influent to the treatment system, the green line is the data that is received at the first intermediate stage, the next line is the yellow line, that is the second intermediate stage, and then the blue line is the effluent from the system. So over this 160-day period the influent concentrations remain fairly steady, around 1,000 nanograms per liter. Then at the first stage following the first treatment unit, you can see that the treatment was effective for the first 80 days getting significant removal of PFOS from that first unit, and then after that 80-day period it starts to increase where, throughout the rest of that 160-day period you're still seeing some significant reductions there, it's just not as effective at, as at the beginning of the treatment system. And then the yellow line is the second intermediate stage and over time that is fairly consistently non-detect until the very end of the 160-day period where you do see the, start to see an increase there also. And then, again, the blue is the last stage after the third unit and that effectively is nondetect throughout the 160-day period. So at that point the carbon unit would be modified and adjusted and then it would effectively restart that treatment system lifespan. that's all I have. Next slide, I quess. And then we can take questions, too.

MR. DAVE CARMONA: Dave Carmona, local RAB.



The

1 replacement cycle, you said it tends to go down at the end 2 of the period. Do you adjust the replacement date based on 3 whether you're getting detects or not? In other words, if you go 180 days you get a detect at 162, do you make the 4 5 change at that point or do you let it complete the cycle? 6 MR. TAREK BUCKMASTER: So the monitoring and the 7 SRD is in place to make sure that that is all being 8 monitored sufficiently so that if there is a change in that 9 duration, that it is, you know, that the tank replacement can occur earlier if needed or not as early if needed. 10 11 it's really just based on the data and how that operation of 12 the treatment system is. Yes? 13 MR. ARNIE LERICHE: Arnie Leriche, Community RAB. 14 Can you talk about the, the cycle change and -- of the I understand I'm pretty sure -- if you can 15 16 confirm -- these units at these, each site are basically a 17 one line of those three tenants; correct? 18 MR. TAREK BUCKMASTER: Yes. 19 MR. ARNIE LERICHE: Okay. So there's no spare 20 there to bring in so you basically have to shut the system 21 down, is that true or you leave, you replace one but the 22 other two are still working, so you're still monitoring? So 23 that's the question.

MR. TAREK BUCKMASTER: Yeah. That'd be better

answered by the operators of the, the treatment system.



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I'm

1 not exactly sure what they do during their tank changeovers. 2 MR. ARNIE LERICHE: So it's also -- but you allow 3 them to do in the SRD, is some specific minimum on that? MR. TAREK BUCKMASTER: I'm not sure how the 4 5 systems are operated during that tank change out. 6 MR. ARNIE LERICHE: Okay. So I guess if they 7 won't answer --MR. STEVE WILLIS: They're typically shut down. 8 9 MR. ARNIE LERICHE: So the line is shut down for 10 that period of time. So what's the length of time? 11 MR. STEVE WILLIS: Typically takes, I don't 12 know, --13 MR. ARNIE LERICHE: To change over the tank? 14 MR. STEVE WILLIS: -- four hours, half a day to, 15 to swap out the carbon. 16 MR. ARNIE LERICHE: And get it back online, yes. 17 MR. STEVE WILLIS: And, yeah, yeah. 18 MR. ARNIE LERICHE: How many? 19 MR. STEVE WILLIS: About four hours; about half a 20 day. 21 MR. ARNIE LERICHE: Okay. Less than half a day. 22 Okay. So there's no spare tank there if --23 MR. STEVE WILLIS: That's correct. 24 MR. ARNIE LERICHE: -- all of a sudden the tank 25 cracks or something or --



1 MR. STEVE WILLIS: No. We -- that's why we've got 2 a redundant system with three tanks in it. 3 MR. ARNIE LERICHE: Okay. Thank you. MR. TAREK BUCKMASTER: Any other questions? 4 5 there anyone online? 6 MS. AMY RAUSER: No. 7 MR. TAREK BUCKMASTER: Okav. 8 MS. JESSIE HOWARD: Thank you, sir. All right. 9 So now I'm just going to kind of go down the list and ask 10 for any additional updates. I will begin with the 11 government RAB. Mr. Palmer, did we have an update for 12 Oscoda Township? 13 MR. BILL PALMER: I do have if someone is 14 interested, our engineers have been working. We've put 15 together a list of all the water main projects that we have 16 and we have a list of the, how many residents have been 17 hooked up, how many wells have been capped and abandoned. 18 And so I have that information to send if you find that 19 interesting. There was some talk that we needed, we needed 20 to have some information so I have that tonight if you would 21 like to see it. 22 MS. JESSIE HOWARD: Thank you, sir. Eric Strayer, 23 do we have an update from Oscoda or AuSable Township? 24 MR. ERIC STRAYER: I have no updates tonight. 25 MS. JESSIE HOWARD: All right. Michael Munson



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MR. MICHAEL MUNSON: Yes. This is Michael Munson from Oscoda Wurtsmith Airport. I'm not going to give an update. I'm going to, I'm going to give a concern that we have right now with one of our --

MS. JESSIE HOWARD: Okay. So right now we are only doing updates. We'll have time for questions, comments, concerns in just a little bit. Denise, did we have an update? Ms. Bryan, sorry.

MS. DENISE BRYAN: Denise Bryan, health officer with District 2. The update is we're working with EGLE on well abandonment. We have identified approximately 68 wells recommended to be plugged for environmental safety and public health safety. What I think is really timely is looking at a recent grant RFP released by the Governor and the state that will help with quality air and quality water infrastructure and District 2 would be willing to be a fiduciary to write for some of the infrastructure costs that our residents may be experiencing. So our epidemiologist, health educator, and EH staff will be starting a proposal. I hope to connect with NOW and the township and any other ideas for bringing needed funds to this area. And congratulations, Cathy, read in the paper how remarkable and impressive you are and you really inspire us, yeah.

Congratulations to Tony. It's, you know, remarkable again



the experience and dedication of our members here to
advocate for environmental and public health justice for
residents and visitors to our area. Very proud to know all
of you and work with you on this important issue. I
appreciate all your time. Thank you.

MS. JESSIE HOWARD: Thank you very much. And,
Chelsea Gary, did we have an update from Public Health?

MS. CHELSEA GARY: Yes. I have a few updates. So first off for 2024, round five residential well sampling. That's been under way with about 100 homes sampled so far and is continuing this month. As with prior years, we have been attempting to recruit roughly 400 homes. As a reminder, if you do have municipal water, we do not recommend using your well water. As another reminder, with the recreational season coming up, MDHHS recommends avoiding all foam on Michigan lakes, rivers, streams and other waterbodies as the foam may contain PFAS or other things that could be harmful to human health. If you do come into contact with foam, rinse it off and bathe or shower after the day's outdoor activities.

On a separate note, an update with OAEA. Clinics are ongoing and scheduling. More appointment slots have been added for both July and August and most, if not all of those slots, are currently open. As of April 29th of this year, 704 participants have enrolled, 564 adults and less



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than five adolescents have completed appointments. 2 Additionally, we would like to thank Cathy for promoting 3 this project and encouraging others to participate, 4 especially with sharing OAEA information to graduating high 5 school seniors. So thank you, Cathy. Also, we wanted to include a reminder about the project on behavioral 6 7 adaptability, learning about novel contamination in the 8 environment also known as The Balance Project. If you do

have questions, let us know and we can connect you with a

study team member. So we just wanted to throw out a

And then lastly, an update on the vapor intrusion investigation. MDHHS has received the final Q2 sub-slab and indoor air quality data and we are working on our analysis and final evaluation of the data. We applaud the building 25 closure and support any additional actions that may be taken to reduce exposure to VOCs. Closure of buildings 43 and 5067 does not appear to be necessary based on initial review of the finalized Q2 indoor air data. However, a plume is identified under the buildings and indoor air data is limited. So we do encourage steps to be taken to prevent VI into the buildings and reduce exposure. While we work to complete our review of the data, we do encourage anyone with questions about their individual exposure to reach out. And that is all I have.

reminder about that.

1 MS. JESSIE HOWARD: Thank you. Jessica 2 Stuntebeck, do we have an update from the Forest Service? 3 MS. AMY RAUSER: So it's James Kountzman, I 4 believe, for the Forest. Do you have an update for us 5 virtually? 6 MS. JESSIE HOWARD: No update? Okay. So now I 7 will move on to the Community RAB members and we will begin 8 with Greg Schulz. Do you have an update for us? 9 MR. GREG SCHULZ: No, I don't. 10 MS. JESSIE HOWARD: Okay. Mr. Henry, do you have 11 an update for us virtually at all? 12 MR. MARK HENRY: No, I don't. 13 MS. JESSIE HOWARD: Thank you. Dave Carmona? 14 MR. DAVE CARMONA: Nothing. Thank you. 15 MS. JESSIE HOWARD: Bill Gaines? 16 MR. BILL GAINES: Nothing. Thank you. 17 MS. JESSIE HOWARD: Arnie Leriche? 18 MR. ARNIE LERICHE: Just a real quick one. That 19 over the last two years the national PFAS advocacy groups --20 and Cathy and I both belong, and Tony, to that group. 21 There's been a lot of push on EPA to bring MCLs, maximum 22 control limitations, enforceable ones, for drinking water. 23 That happened early April and it followed with the Federal 24 Register a few days later. So they want a 60-day clock before they become totally final. And so yesterday -- and 25



- 1 sometimes the MCLs in the drinking water do affect the 2 groundwater standards; most of the time they do affect them 3 in some way. So federally they promulgated the federal 4 drinking water standards for utilities, the large and medium size and small size were fairly small. So trailer parks, 5 big ones, are still regulated, will be. But for private 6 7 wells it's not a federal standard. They're hoping that the 8 states will pick up and incorporate those numbers like four 9 parts per trillion for PFOA and PFOS. So I just want you to 10 know about that because it does -- and also how those MCLs 11 and the toxicity that make them able -- the agency able to 12 pass those really low, not as low as we would like, but 13 they're very low compared to where we were 12 years ago at 14 9 -- 400 and 200 parts per trillion. So when we hear the, 15 the risk assessment presentation, I asked this yesterday of 16 the Air Force's contractor, so I'm hoping that she'll cover 17 the same thing. What's happening, what are they preparing 18 for, and when will they be incorporating those into the risk 19 assessment, at least the human health risk assessment. 20 Okay. Thank you. 21 MS. JESSIE HOWARD: Thank you. Is -- Scott Lingo,
- 22 have an update for us?
- 23 MR. SCOTT LINGO: Not at this time.
- 24 MS. JESSIE HOWARD: Okay. Josh Sutton, update?
- MR. JOSH SUTTON: 25 No update.



MS. JESSIE HOWARD: Rex Vaughn, do you have an 1 2 update for us? 3 MR. REX VAUGHN: No update at this time, please. MS. JESSIE HOWARD: Thank you. David Winn? 4 5 No update at this time. MR. DAVID WINN: 6 MS. JESSIE HOWARD: Okay. And last but not least, 7 Cathy Wusterbarth? 8 MS. CATHY WUSTERBARTH: Thanks. I do have just 9 a -- I was going to mention what Arnie mentioned about the 10 national drinking water standards that I feel like is going 11 to change things here. I know for our community it's going 12 to really help with monitoring our drinking, our drinking 13 water source which is Lake Huron and we will be hoping to 14 test that more regularly because it appears the approach at 15 this site is dilution is the solution for this pollution and 16 we just don't want our drinking water source to be affected. 17 So we will be monitoring that closely. And then I just 18 wanted to give a reminder. Historically this, we're on our 19 eighth year for this RAB or this Restoration Advisory Board. 20 This is our 24th meeting. So lots of people are doing lots 21 of work. We have a lot of different staff that have turned

over both with the state and with the Air Force, but there's

So I really appreciate -- including Mark Henry who's

a lot of dedicated community members that have stuck with

on the line, so. It's rare that he misses a meeting, so



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1 | we're thinking about him.

MS. JESSIE HOWARD: Thank you, Cathy. Okay. So next Mr. Willis will give us an update on RAB business.

(RAB Business Update at 5:40 p.m.)

MR. STEVE WILLIS: Next slide, please. Next slide. So as Jessie indicated earlier, all the RAB members should have a copy of the action items for the RAB. The first, first packet is the open action items and the second one is the closed ones. And the closed ones include closed action items back to the time when we started documenting these from what I can tell. But I just thought it would be good for everyone to have kind of the baseline for what's open and what's been closed over the past number of years.

We did have a virtual action item meeting after the last RAB meeting and it was on the 27th of March, 6:00 o'clock eastern time, and we'll have another one following this RAB. I've proposed the 12th of June for that, that day of the week, from the feedback I've gotten seems to be the best and we've talked about having it about a month after the RAB meeting. So if that, if that date is a big problem for most of the RAB members, let me know, but otherwise we'll work towards having that RAB action item discussion meeting that evening.

Also, this on the slide here is a summary of the action items since the last meeting. We opened seven new



ones at the last meeting, we've closed ten since that meeting and we've got a total of 39 that are open and still being worked. One of the action items that is still open and I mentioned to Mark Henry last night and I know he asked for it at the last RAB meeting, and so we are going to be able to provide the RI data set to the RAB members once we've gotten all that data and it's all been validated.

We're sharing it both with EGLE and with the, the RAB. And so that'll be out prior to the actual RI report so it'll give you guys a chance to look at that data. Next slide.

Since I put together this slide, there's a quick update. I did distribute the November and January BCT meet-, meeting minutes prior to the meeting and yesterday I did receive the final BCT minutes and distributed those to the RAB members as well. For the -- excuse me. And then hard copies of those always go in the library as well, but I know there's been requests for electronic versions, so I e-mailed those out.

For the March BCT meeting, you've got the minutes now, but just a quick recap. We had a discussion with, with EGLE and the other state agencies on MAROS. It's a software package that's used for system performance and optimization. It's the Monitoring and Remediation Optimization System software. It's actually a freeware package and so we presented to EGLE kind of our thoughts on how we could use



1 it, whether it would be beneficial from their perspective. 2 We're continuing to have discussions with them on whether or 3 not we want to actually start implementing that. It's a fairly easy software to use and maintain, but it's going to 4 be fairly laborious to initially load all of the Wurtsmith 5 So we want to make sure that we're all onboard and we 6 data. 7 all agree that if we use it, that, you know, we can all 8 benefit from it, agree on the results and the outcome from 9 that software package and then move forward to implement it. So, again, we're still in discussions with EGLE on whether 10 11 or not we, we find value in it. And that's it for me. 12 slide. Yes. 13 MR. ARNIE LERICHE: We're going to ask guestions 14 at the end of each section or not? 15 MR. STEVE WILLIS: I'm sorry? What? 16 MR. ARNIE LERICHE: Can we ask questions at the 17 end of the, each section before we go to another or not? 18 MR. STEVE WILLIS: Sure. This -- yeah. 19 MR. ARNIE LERICHE: Well, a quick one is does that 20 software in any way make it easier to share that, any of 21 that data or slides or whatever that you present at the BCTs 22 or anything like that --23 MR. STEVE WILLIS: The --24 MR. ARNIE LERICHE: -- to the public, to the RAB,



number one?

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1	MR. STEVE WILLIS: Right. I'm not that familiar
2	with the software to know what
3	MR. ARNIE LERICHE: Okay.
4	MR. STEVE WILLIS: what display capabilities it
5	has for sharing data. And the real focus is on monitoring
6	and optimizing the treatment systems.
7	MR. ARNIE LERICHE: Right. Well, that's a very
8	important thing as we, some of us ask questions of Tarek.
9	So just think maybe bring a question to the consultant that
10	developed it, see if the public has a benefit from, from
11	using it.
12	MR. STEVE WILLIS: I'll look, I'll, I'll look
13	into, look into whether there's outputs we could use to
14	share information.
15	MR. ARNIE LERICHE: Thank you.
16	MS. JESSIE HOWARD: So just a real quick reminder
17	before we begin tonight's presentations to please hold your
18	questions for the presenter until either she breaks for
19	questions or the end of her presentation. We will have time
20	to address all of those. And first up we have Ms. Paula
21	Bond, project manager with Aerostar to give us an update on
22	the PFAS RI and the Alert Aircraft Area IRA. Paula?
23	(PFAS RI and the Alert Aircraft Area IRA Update at
24	5:45 p.m.)
25	MS. PAULA BOND: Thank you. Thanks, everybody,



for coming this evening. I like the RABs in the spring and summer because it's still daylight outside when we're, when we're talking.

So I've got a fairly brief presentation for this RAB. Since the last RAB we haven't done a whole lot, but I will give you an update on what we have done and completed and kind of where we are on both the PFAS RI and the Aircraft Alert or the Alert Aircraft Area IRA. Next slide, please.

So really quickly -- and Amy hit on this in her update. We did complete the UFP-QAPP addendum. That was finalized a couple of weeks ago. And like she said, that should show up on the administrative record very soon. We are also complete with the sampling for the RI. So we did do some extra, not extra, but we did go out and collect some groundwater samples since the last RAB. We just finished that task up. We're receiving that data now. So when we have the next RAB, that will be the presentation of all of the data that we've collected during the RI so far. And as we are looking at the data -- and Steve talked a little bit about this as well -- we're looking at data gaps as we evaluate that data for a future investigation. Next slide please.

So this slide just shows kind of a summary of everything that we've done for the RI. So if you look at



the bottom of the table, we have sampled over 4,000 samples 1 2 for the RI which is really an impressive number, I think, 3 for all of the samples that we've collected out there. 4 Groundwater were the most samples that we've collected or 5 for soil, over 2,000 soil samples that we've collected from 6 across the base. You know, and I have just a list of the, 7 you know, 499 soil borings, vertical aguifer sampling at 170 8 locations, hydraulic profiling at 93 locations, installed 63 9 new monitoring wells and 20 piezometers and we have 10 sampled -- and this includes the data we just completed --11 230 existing monitoring wells out there. So a lot of 12 sampling has gone into the RI. We have collected a lot of 13 data, really good data, so we're excited. We've been 14 evaluating the data that we have so far, so we're really 15 excited to put all this into the RI report and get that over 16 to the Air Force. Next slide, please.

So the data that we collected between the last RAB and this RAB -- I just have a couple of slides. We collected some supplemental surface water and sediment from the area near Pierce's Point. It's a little bit difficult to see on this figure. But we did collect some additional samples up there, just a couple, based on the data that we had collected, the groundwater data for the Aircraft Alert Area and the RI. So we went ahead and grabbed a few more samples up there. And I don't have a pointer here with me,



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but if you guys -- it's right in this area here. It's a
little hard to see there. Next slide, please.

So we collected groundwater samples from 91 existing monitoring wells out there on the base. We just recently completed that. Like I said, we're waiting on that data to come in and once we do, we'll share that with EGLE and the Air Force. All of this data that we've collected will be wrapped up. We've provided most of it already to the risk assessors which you're going to hear about a little bit later. And this figure shows the existing monitoring well locations that we sampled. Just to give you an idea, they were all across the base to give us a, a broad range of data from a lot of areas, a lot of sites. So next slide, please.

So the ongoing activities. So we have finished our sample data collection. We still have the transducers that we installed. They're out there around Van Etten Lake. We'll continue to collect data from those through November. They're, they're continuously collecting data for us out there. We download that data at regular intervals. The conceptual site model is continuing to be updated. As we collect new data, it's fed into the conceptual site model. So once we finish the RI report, all of that data will be rolled into the CSM and that will be part of the RI. The Human Health and Ecological Risk Assessments are underway.

Again, you'll hear a little bit more about that in just a few minutes. And the draft RI report, this is something to keep in mind, too. We'll include the updated conceptual site model and the risk assessment. So all of that will be wrapped into one, one nice report and we plan to get that to the Air Force this summer in the July time frame, the draft document. Next slide please.

We'll move on to the Alert Aircraft Area really quickly. From the activities that have taken place since the last RAB, we've not had a lot of activity on this front. Currently the Record of Decision is being reviewed and negotiated between the Air Force and EGLE. We're looking at ARARS right now. So as soon as those are finalized, then we'll get the ROD, signature on the ROD, get that done and we can start construction on the actual treatment plant. We do anticipate that construction will start in late June. The building has already been delivered. We're starting to receive materials for the construction of that treatment system. So everything is moving forward with that and, and we hope to start in, in June with the actual breaking ground out there. So next slide, please.

We have a couple of schedules in here, the oneyear outlook. We've updated that to include everything that we have going on. The RI field sampling and the transducer monitoring, like I said, we're going to monitor those



1 transducers until November of this year and then we'll look 2 at that data. The RI report you see going out. And then 3 there's an RI data gap and feasibility study that Steve That is out in '25. We have the Alert Aircraft 4 mentioned. 5 Area IRA construction you see on here. We have that 6 treatment system up and running by the end of this year and 7 then operations and monitoring will continue on past that. 8 The Three Pipes Ditch, we are still doing some monitoring, 9 some flow meter measurements out of Three Pipes Ditch. we're still continuing that work and will continue that 10 11 through the end of the year. And -- oh, sorry. 12 MR. STEVE WILLIS: Just let me interject.

MR. STEVE WILLIS: That, that monitoring data from Three Pipes we'll use the design in the IRA so that's useful information. We're not just collecting data to collect it, but we'll actually be able to feed it into that process.

MS. PAULA BOND: Sure.

MS. PAULA BOND: Right. We have added to the schedule the new IRAs for the DRMO and landfill 030/031 to the schedule. So you can see the way we have it laid out here for the proposed plans to start in the fall of this year and move forward and we did put some tentative dates on here for the public meeting just to kind of give everybody an idea when that might take place based on the schedule. And then you can see the 30-day comment period and then the

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1 | IRA, the Records of Decision moving on out from that. Next 2 | slide please.

So the five-year outlook has been updated similarly. We've added in the end remedial actions for DRMO and landfill 030/031 down at the bottom. So those will continue to run on the schedules going forward and we'll just move everything out. But you can look at the schedule for the RI and we have the -- it's a little hard for me to see -- the RI report being finished in 2025, and then the, a data gap investigation feasibility study going from 2025 over to the second quarter of 2026, and then the proposed plan, the record decision and all of that on out from there following the CERCLA process. So the Alert Aircraft Area, again, once we move into the five-year outlook, we're really looking at long term monitoring and operation of that system as we move past 2024 when that system is up and running. And then again down at the bottom you see the DRMO and landfill 030/031 out, in the out years and of course ending in 2028 we're still doing O&M out there and maintenance. Next slide please.

Oh, so we've added a couple of things on here on, onto a new slide here. So we have the Three Pipes Ditch -- so, Steve, I don't know if you want to say anything about these newer IRAs for Three Pipes Ditch and the wastewater treatment plant?



1	MR. STEVE WILLIS: Yeah. At this point these are
2	notional schedules. As we've indicated in the past, our
3	plan is to award contracts for these in the FY25. Once
4	we've got a contractor on board, they'll develop a more
5	detailed schedule and then we'll update these slides with
6	that. And just, just at a notional level, this is what we
7	envision occurring for the schedules of those two projects.
8	MS. PAULA BOND: So these will be added continue,
9	continuing for our schedules going forward, these two new,
10	new IRAs here. Next slide please. I think that may be it,
11	yeah. All right. Any questions?
12	MR. DAVID WINN: I thought we weren't supposed to
13	ask questions
14	MR. MARK HENRY: This is Mark Henry. I have a
15	question please.
16	MS. PAULA BOND: Do you want to do questions now?
17	Yeah; yeah.
18	MR. STEVE WILLIS: At the end of each
19	presentation.
20	MS. PAULA BOND: Yeah, go ahead, Mark.
21	MR. MARK HENRY: Of the transducer wells that you
22	have already transducers in and piezometers, did those wells
23	contain PFAS?
24	MS. PAULA BOND: The wells that we we sampled

all of the piezometers and off the top of my head -- I don't



1 want to give you an answer because I don't want to 2 misspeak -- but I believe most of those piezometers that we 3 sampled, if there was a detection, it was below our screening criteria. But I will confirm that and check and 4 let you guys know. It's on the, the, the maps out in the 5 6 lobby. 7 MR. MARK HENRY: Okay. Thank you. 8 MS. AMY RAUSER: Rex Vaughn. 9 MR. REX VAUGHN: Paula, this is Rex Vaughn. 10 MS. PAULA BOND: Hi, Rex. 11 Question for you. MR. REX VAUGHN: 12 MS. PAULA BOND: Okay. 13 MR. REX VAUGHN: Do we have any idea how many 14 pounds of PFAS we can expect to pass through Three Pipes 15 Ditch and the wastewater treatment plant areas into the 16 AuSable River during the time it's going to take to get 17 these treatment systems in place? How, how much pollution 18 are we just going to let flow unhindered into Lake Huron 19 while we go through the process of getting these treatment 20 systems in place for the other two areas? 21 MS. PAULA BOND: I do not have a calculation for 22 that. 23 MR. STEVE WILLIS: Yeah. We have -- we haven't 24 done mass calculations for that.

MR. REX VAUGHN: Any guesses? Are we, are we, are



- 1 we passing a lot that we're not even bothering to treat or 2 is it a small amount? Anybody got any ideas? I -- gut, gut 3 feel for how much we're just letting go by without even 4 touching it? 5 MR. STEVE WILLIS: Paula, do you recall the 6 concentrations at the Three Pipes outfall going into the 7 river? Concentrations are fairly low so the, so the mass is 8 not --9 MS. PAULA BOND: Yeah, at the outfall they're 10 definitely lower than they are where the discharge comes out 11 of the, the storm drain. I don't know the numbers right 12 offhand. I'm afraid -- I don't want to give you a wrong 13 number here. 14 MR. STEVE WILLIS: They're on the posters here. 15 And, Rex, you'll have access to the posters on the RAB web 16 site as well. 17 MR. REX VAUGHN: Okay. I, I'm just concerned that 18 we've got a couple of big leaks that are pushed out on the 19 calendar and wondered if they are considered part of the low 20 hanging fruit that we need to get a hold of and shut down 21 before it really makes a mess of things in the future. 22 done. Thanks.
- MS. CATHY WUSTERBARTH: This is --
- MR. MICHAEL MUNSON: Yeah. Can I go first?
- 25 MS. CATHY WUSTERBARTH: Sure. I want, I want to



1 address the lack of data that seem to --2 MR. MICHAEL MUNSON: Why don't you do that and 3 then --4 MS. CATHY WUSTERBARTH: Okay. In the, the 5 posterboard back there, the Three Pipes Ditch area effluent, 6 PFOS 421 and 657 coming out of those three pipes. You said 7 it was low. 8 MR. STEVE WILLIS: Is that at the river or is that 9 10 MS. PAULA BOND: Is that out of the --11 MS. CATHY WUSTERBARTH: The three pipes. 12 MS. PAULA BOND: -- I don't know. Okay. 13 MS. CATHY WUSTERBARTH: F1, yeah. Yeah, that's 14 not low. 15 MR. REX VAUGHN: No, not at all. I think we're, 16 we're -- we got a gorilla in the room that's invisible at 17 the moment and that's Three Pipes and the wastewater 18 treatment plant. So don't forget that that thing is still 19 around. 20 MS. CATHY WUSTERBARTH: Yeah, and I do -- I mean, 21 if I could ask you to go back to slide 36? Yeah, so Rex, 22 he's talking about that, the Three Parts -- Pipes Ditch, 23 Ditch monitoring? Yeah, there's nothing after that. 24 There's no implementation of anything. 25 MS. PAULA BOND: Right. But if you go to slide



37, so this is where we start up with the, the IRAs for Three Pipes Ditch. So that's what Steve was saying is that the data that we're collecting now is going to feed into that.

MR. STEVE WILLIS: The monitoring was actually part of the pilot study that we ended up terminating. We briefed that at a previous RAB meeting where we were going to put the media in the, in the ditch to remove PFAS in the surface flow and based on the storm event, it was going to wash the, the matting away basically defeating the purpose of it. And so we terminated that, but we did retain the monitoring portion of that pilot study to gain useful data. So they're, they're really tied, they're independent, but we'll use the data for to feed the other.

MS. CATHY WUSTERBARTH: Okay. And also I was hoping that you could clarify -- oh, well, this, this is regarding two other sites so I will ask that question later.

MS. PAULA BOND: Mike?

MR. MICHAEL MUNSON: Yeah, okay. I, I want to get this out because -- again, this is Mike Munson from OWAA. And MDHS did a great job at about a zillion miles an hour talking about a concern we had last meeting in regards to the conflict of building 43. They made it clear that it's not an issue. I want to make sure that USA Jet understands that. They're here tonight to make that concern. They got



a two-part concern that I think probably the RAB will want to make this an action item. Because these are basically businesses just trying to, trying to make money day in and day out and it's important that the folks in there are safe, that an action item may be -- if there's any mitigation required for tenant-occupied spaces, the Air Force needs to provide really some details. What the nature is, what the timing is, what the cost and who's going to basically cover it and any implica- -- or any effect to the occupancy of the building. And then, too, in 2027 does the Air Force plan to put in some measurement guidelines on mitigation. I think those are two important things when we talk about vapor intrusion. We need a peg in the ground so we don't have the confusion like we did last time.

MR. STEVE WILLIS: A quick clarification. You said 2027. What's, what's the basis of that date?

MR. MICHAEL MUNSON: I think that's just their -- again, they're trying to basically deal with what's happening down the road and if something happens to their building, they need to know about that.

MR. STEVE WILLIS: Okay.

MR. MICHAEL MUNSON: And, and I think what they're looking for is a long-term plan that, you know, is there, is there basically something they have to do with their staff or their business because they're, you know, they're trying



to make money day in and day out here. 1 Okav? 2 MR. STEVE WILLIS: Yeah. 3 MR. MICHAEL MUNSON: Thanks. MR. DAVE CARMONA: Paula? Dave Carmona, Community 4 5 RAB. 6 MS. PAULA BOND: Yeah. 7 MR. DAVE CARMONA: I know you're going to give us 8 the data set, but when will we see what you are identifying 9 as the RI data gaps? When will we be briefed on that? I will defer to Steve on that. 10 MS. PAULA BOND: 11 We're putting together some data gaps now as we're looking 12 at the data, but as they actually fall out into a future 13 contract or work plan or something like that... 14 MR. STEVE WILLIS: Yeah. We should be able to 15 share those at the November RAB. 16 MR. DAVE CARMONA: Okay. That's okay. And then 17 the other thing you didn't discuss because you were talking 18 about remediation at one point. As the new technologies 19 come online, will you be considering them to replace the 20 pump and treat? For example, the pilot program failure at 21 Three Pipes, is there possible for new technology to be used 22 that's coming online? 23 Yeah. When the, the site-wide MS. PAULA BOND: 24 feasibility gets underway, that, whatever technology is 25 available at that time, all of those technologies will be



evaluating for addressing the site-wide groundwater, surface water, sediment, whatever the remedy needs to be based on the data we collect and the risk assessment. So, yeah, all technologies available at that time will be evaluated.

MR. DAVE CARMONA: Okay. And then the last question I had was concerning the Three Pipes proposed plan slipping beyond the feasibility study. My concern is this is going to fall out of the bottom and through the cracks because there is no easy solution to that water flow. Will that be captured separately if it's not in the feasibility study? I can see this slipping well beyond the end of that study in '26.

MS. PAULA BOND: Yeah, so it will be -- they will work. So when the IRA for the Three Pipes Ditch, that's going to get underway before the feasibility study for the RI. So that will be ahead of the RI, the site-wide feasibility study. So that remedy can't be inconsistent with what the site-wide remedy will be. So it will work in tandem. It will be adjusted, again, depending on the technologies that are available to us when we get to the feasibility study, when the Air Force gets to the feasibility study, everything will be evaluated and it will be integrated into the IRAs at, at Three Pipes or all of the other IRAs that have been done.

MR. DAVE CARMONA: Thank you.



1 MS. PAULA BOND: You're welcome. Yes, Dave? 2 MR. DAVID WINN: I got a coup- -- I got a couple 3 questions. 4 MS. PAULA BOND: Okav. 5 MR. DAVID WINN: Slide 29. You're showing that 6 the data gap investigation anticipated in the summer of 7 2025, but your time line shows January. Which is it? 8 MS. PAULA BOND: The field work is in the summer 9 of 2025. Steve had mentioned that he anticipates to have 10 that contract awarded by January. 11 MR. DAVID WINN: No, hold on. 12 MS. PAULA BOND: Oh, sorry. 13 MR. DAVID WINN: Your R- -- it says, RI sampling 14 is under this task. "Data gaps identified in the RI will be 15 filled during the data gap investigation anticipated from 16 January 20- -- or summer of 2025." 17 MS. PAULA BOND: Right. 18 MR. DAVID WINN: If you go to your time line, your 19 time line shows the data gaps start -- investigation 20 starting in January. Which is it? MR. STEVE WILLIS: The contract will be awarded 21 22 for the data gap investigation in January, then we write a 23 work plan and we'll do the field work. The, the time line 24 shows the full duration of the project. It'll include --

it'll include the work plan, the actual data, the sample

collection, the report for it, and then we've also got the 1 2 feasibility study and proposed plan and ROD as part of that 3 activity. So the data gap investigation 4 MR. DAVID WINN: 5 won't start for another year; is that --6 MR. STEVE WILLIS: The field work would be another 7 year, yes. 8 MR. DAVID WINN: I'm, I'm, I'm confused because 9 aren't you and EGLE supposed to be sitting down and putting 10 together that plan? 11 MR. STEVE WILLIS: We still don't have all the 12 data compiled from the RI and that's the basis for 13 identifying data gaps. I mean, we've got some known gaps 14 for work that didn't get done as part of the RI that were in 15 the QAPP addendum. But as we look at the data, we may 16 identify additional areas that require sampling based on the 17 information we collected. Those are, those are your, 18 effectively your data gaps. So we need to compile and look 19 at all that data collectively to, to finalize our data gap 20 identification. 21 MR. DAVID WINN: So the east side of Van Etten 22 Lake and everything else, that's going to wait another year 23 or so; right? That what you're telling me?

MR. STEVE WILLIS: For the actual sample



collection that's correct.

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1	MR. DAVID WINN: What a joke. All right. I have
2	another question. Currently you said the, the ROD is under
3	Air Force review. EGLE hasn't even received that ROD yet.
4	Have you, have you been scheduled to see that ROD?
5	MS. AMY HANDLEY: No, we have not.
6	MR. DAVID WINN: Do you have any anticipated idea
7	when you're going to receive when EGLE is going to
8	receive that for review and how much time are they going to
9	be given in order to review it?
10	MR. STEVE WILLIS: I expect that we'll have, have
11	that to EGLE in the next couple weeks. We would expect
12	probably a turnaround two to four weeks from EGLE.
13	MS. AMY HANDLEY: Yeah, we, we understand that
14	this document is critical to making this stuff start, so we
15	are going to be doing everything we can to expedite this
16	review. We're not going to be sitting on it. So
17	MR. DAVID WINN: Yeah, I understand that. What
18	I'm telling you is right now you're showing that the, the,
19	the start of the construction is June of '24, and, but that
20	you can't start that with the ROD; right?
21	MS. PAULA BOND: Correct.
22	MR. STEVE WILLIS: Correct.
23	MR. DAVID WINN: So you ain't going to make June
24	of '24 either.
25	MS. PAULA BOND: We are hopeful that we can. So



we are, we are working toward the end of June for start of 1 2 construction. So as soon as the ROD is signed, like I said, 3 we're ready to go. The building has been delivered. We've 4 got everybody lined up, ready to start breaking ground out 5 there, so --6 MR. DAVID WINN: In the meantime PFAS is entering 7 Van Etten Lake every day; true? 8 MS. PAULA BOND: True. 9 MR. DAVID WINN: Okay. I'm done. 10 MS. PAULA BOND: Arnie? 11 MR. ARNIE LERICHE: I don't know if it's a 12 question for Steven or for Roger. But you're, you've got a 13 list that's growing and growing about contracts that you're 14 awaiting the funding so that you can then go through the 15 process of finding a contractor and award them and so forth. 16 And you mentioned a couple was the, two of those IR-, IRAs, 17 the pipeline down at Three Pipes and there are others. And 18 so my question is if the federal DOD budget is not passed 19 and it goes to a continuing resolution in October, are the 20 funds that you're hoping to get going to not -- will not be 21 available because in a continuing resolution can on-, can 22 only spend basically what your budget was last year? Will 23 it get caught up so that you're going to be stuck on some 24 portion or all of this list of contracts that you are 25 planning on awarding?



1 MR. STEVE WILLIS: That, that, that is a 2 possibility. 3 MR. ARNIE LERICHE: All of them? There's no 4 money --5 MR. STEVE WILLIS: I, I would, I would not expect 6 that everything would come to a screeching halt, no. 7 MR. ARNIE LERICHE: Roger, do you know how that 8 will work? Because you're already using up the money that 9 was not spent by teams. You started working on that in 10 February. 11 MR. ROGER WALTON: Yeah. So typ-, typically what 12 you executed the prior quarter in the previous fiscal 13 year -- and I am not a fiscal budget expert by any 14 stretch -- but that's usually the allotment of money that 15 will come back to program. So it will be a mirror of what 16 we did this year. So if there was money in October that was 17 programmed -- sorry. If there was money that was, that was 18 programmed in October of last year under continuing 19 resolution, we would, we would expect the same amount. And, 20 you know, the problem with continuing resolution is it gets 21 doled out very slowly so the, the actual ability to spend 22 it, you know, the -- it's, you know, recurring things that, 23 that can't be broken: utility bills, keeping the treatment 24 plants running, things like that. Those, those are, those 25 are givens. But new starts can get slowed down. It's, it's



just, it's impossible for us to predict at our level to, to
what effect that those numbers are going to come down and
what they're going to look like.

MR. ARNIE LERICHE: So the sub-question is where is Wurtsmith on the pecking order in that final quarter and especially if a continuing resolution and there's no budget, full budget, and what's the priority list, priority of the list that you're making now of what contracts and money you need for these projects? Do you have a priority list if the money make -- is made, made available?

MR. ROGER WALTON: That's all under development. So our FY- -- or that's all under development. The FY25 planning and the racking and stacking of those projects across the entire RAB program is still being worked. So the, the cost to completes are being developed now and then the racking and stacking will happen later in the year.

MR. ARNIE LERICHE: When will you be able to share it with us?

MR. ROGER WALTON: The complete rack and stack I'm, I'm not sure that I can. But, I mean, we can certainly tell you where, where the Wurtsmith projects align.

MR. ARNIE LERICHE: Okay. The easier question, I guess, is can you share the list that your technical people and managers have already submitted to that full BRAC team?



1 MR. ROGER WALTON: Steve, I'm not --2 MR. STEVE WILLIS: I, I don't -- I'm not -- I 3 don't believe that we can share that. But I can, but I --4 MR. ARNIE LERICHE: But you have made a priority 5 list of all those projects? 6 MR. STEVE WILLIS: Well, he's -- as Roger just 7 said, that that's being racked and stacked across the BRAC 8 program. Wurtsmith is always in the top priority. Has been 9 and will be. 10 MR. ARNIE LERICHE: Okay. But we still may have 11 to talk to some congressionals. Thank you. 12 MR. ROGER WALTON: Sure. 13 MS. PAULA BOND: Cathy? 14 MS. CATHY WUSTERBARTH: I, I have a question. 15 Just a clarification. At the last meeting, Steve, we were 16 talking about funding for the DRMO and L-, LF 030/031. And 17 you had made a statement that you did not have any funding 18 for, for any work this year. And so I think there was a 19 correction on that after the fact and wondering if you could 20 just mention that? 21 MR. STEVE WILLIS: So we do actually have funding 22 for LF 030/031 DRMO. We're planning to award a contract for 23 that this year. We're already working with our contracting 24 and we'll have that done by the end of the fiscal year. I

think when I made the comment it was related to wastewater



1 treatment plant and Three Pipes Ditch and I did misspeak. We do actually have funding. We're, we're working with 2 3 Nobles now who did the critical process analysis to help. In the CPA presentations, they were very top level concept 4 5 on IRAs. And so we are working with them to further refine 6 and define the designs of those so that we can put that at a 7 scope of work and actually have contractors bid on that 8 work. So we are, we are working that process now. 9 MS. CATHY WUSTERBARTH: Thanks. 10 MS. PAULA BOND: Any other questions? 11 MR. MARK HENRY: Mark Henry. 12 MS. PAULA BOND: Oh. 13 MR. MARK HENRY: Mark Henry here. I have one 14 additional question, please. 15 MS. PAULA BOND: Go ahead, Mark. 16 MR. MARK HENRY: As I recall from the February RAB 17 meeting, I think it was Steve who said that there was some 18 FY23 money or maybe it was '24, for doing the 19 characterization of the groundwater for the Three Pipes 20 Ditch that the CPA process identified as an IRA and also the 21 wastewater treatment plant in advance of the proposed plans. 22 I do not see that on slide 37. So is that advanced 23 characterization not going to be done? 24 MR. STEVE WILLIS: That, that'll be done as part 25 of that contract. So they'll do the, the pre-design work



and they'll do the, the design and construction. 1 2 MR. MARK HENRY: Okay. Thank you. 3 MS. PAULA BOND: Any other questions? Oh, Arnie? MR. ARNIE LERICHE: Arnie Leriche, a follow-up 4 5 question to Mark's. The contractor that's going to be doing 6 that work has that already been awarded so the money has 7 already been obligated? 8 MR. STEVE WILLIS: For, for the wastewater 9 treatment plant at Three Pipes Ditch, no. That is in our FY25 budget. The DRMO and the LF 030/031 is funded this 10 11 year and we're awarding that contract. We'll award the 12 other two next year. 13 MR. ARNIE LERICHE: That's why the sharing the 14 list of to make sure that we know which projects are caught 15 up in the FY25 budget. That would help us a lot, you know, 16 specific to the contracts and the projects that you need or 17 can or can't award unless you get the '25 budget. 18 MR. STEVE WILLIS: Yeah. I, I don't anticipate 19 that the, that the funding would be a problem unless there's 20 a huge change in the government budget. 21 MR. ARNIE LERICHE: And this is an election year. 22 MR. STEVE WILLIS: The program we've -- well, 23 that's true. But we've programmed these two IRAs, we've had 24 them in our program for a while so I, I don't, don't

anticipate that there's going to be a problem with the



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MR. ARNIE LERICHE: Thank you.

MR. STEVE WILLIS: It's not like it's a brand new, last minute thing that we slipped in, so we've been planning for additional IRAs.

MS. PAULA BOND: Scott?

MR. SCOTT LINGO: As Rex had mentioned -- Scott Lingo with Community RAB -- his concern about Three Pipes Ditch. And, you know, in looking at the forecast as to when that's going to start, fourth quarter of '25 they're going to have a plan. You know, as summer approaches, kids from the Villages, that is a high use area on the AuSable with the e-flux immediately upstream of where all the canoers come down the river and all the kids come out of the Villages of Oscoda to swim and play and them like myself as a child will probably be making the beards and the mohawks and the things that we did on but I'm not allowed to drive. And as Rex had stated, it just seems like we're taking too much time there. You know, we, we tried to do the pilot plan where they said oh, you know, a high rain event is going to take out these I guess, like, sponges that they had where the water would go through. I mean, can't we fix them and put, like, chicken wire across and make a cage where they stay in that stream? I mean, is there not a way that we can cut down those numbers even if it's just temporarily



and then look to a more permanent remediation process? It just seems like to me that Three Pipes Ditch is the most obvious point source that we have that people can see flowing into the river and we know it's there.

MR. STEVE WILLIS: And, and we are working that.

That is, that is in our plan to address that site but it is a process. Even -- I've got to get a contract awarded, we've got to write a work plan, get it approved and then actually implement the remedy. So it, it just takes time.

MR. SCOTT LINGO: And time is our enemy and human health is being destroyed and it's just extending the dates, "oh, we got to do this, we got to do that." I mean, can't we cut down some red tape? I mean, jeez, give us the sponges. We'll get local contractors to put them in the stream. What do we have to do to get stuff going, you know? It's just, it seems like it's just put off, put off. I'm looking at these time lines. We're out to '26, '27 and here we sit 2024. Just keep hearing more extensions, more extensions and it's, it's really -- it's depressing. It's hard to stay pumped up when it seems like things just get brushed down the stream, so to speak.

MS. PAULA BOND: Arnie?

MR. ARNIE LERICHE: Arnie Leriche, Community RAB.

A follow up to that is, Steven, last, like, six months ago
the pilot study you were going to put on the Three Pipes



outlet it was washed away. I mean, it was unreal how much 1 2 water went down there. But that happens at a less extent, 3 extent, but still significant many times during the year. So can you give us a status? You did a, a study or you 4 5 looked at where the pipe was allowing groundwater to seep into that so it overloaded that sediment tank that's at the 6 7 -- before its outfall and also somewhere in that storm water 8 system a high volume of water going through might be picking 9 up AFFF-contaminated groundwater that would never have gone 10 into the pipe. 11 If you recall from --MR. STEVE WILLIS: Yeah. 12 MR. ARNIE LERICHE: So has it been fixed, the slip 13 line or, or cracks, whatever, fixed or whatever? 14 MR. STEVE WILLIS: It, it has not. That's what 15 we're evaluating. If you recall from I think Paula's 16 presentation at the last reading -- RAB meeting, there is 17 groundwater getting into that system. She had the pictures 18 of it basically spraying into the pipes and so we are 19 working on that. 20 MR. ARNIE LERICHE: Well, that doesn't need an 21 IRA; right? 22 MR. STEVE WILLIS: Well --23 MR. ARNIE LERICHE: You've just got to find some 24 money to do it.



MR. STEVE WILLIS: Okay.

1 MR. ARNIE LERICHE: It's basically a short cost, a 2 lower cost than a full IRA, but it could be significant. 3 Because I'm really surprised at the numbers that Cathy threw Because it used to be that that outfall way up 1,000 4 5 feet before the river was only about 1,000 parts per trillion. So I don't know what could make it -- I agree 6 7 with you -- this dilution between that outfall up there near 8 the Villages and housing and the river. 9 MR. STEVE WILLIS: Right. That, that's something we're looking at. I don't have any additional details for 10 11 you now. So likely --12 MR. ARNIE LERICHE: Can you commit to a, a 13 briefing for us or --14 MR. STEVE WILLIS: When I have, when I have, yeah, 15 details that I can share I will. 16 MR. ARNIE LERICHE: Before the next RAB? At least 17 in writing? 18 MR. STEVE WILLIS: I can't quarantee you it will 19 be before the next RAB. 20 MR. ARNIE LERICHE: But will try? 21 MR. STEVE WILLIS: Yeah. 22 MS. PAULA BOND: Dave, did you have a question? 23 MR. DAVE CARMONA: Yeah. Dave Carmona, Community 24 Reference the budgeting items. Usually about this RAB. 25 time of year the request comes from DOD or whatever agency



- or department you're with in the government for
 discretionary letdown portion of the budget come July. Do
 you have a plan for that should you receive any money as to
 what you can accelerate?

 MR. STEVE WILLIS: I do not. I've still got
 - MR. STEVE WILLIS: I do not. I've still got plenty of money that was budgeted for Wurtsmith that we're working on getting on contracts.
 - MR. DAVE CARMONA: Okay. But if that additional money comes down in July through the discretionary letdown process, do you have a plan for it?
 - MR. STEVE WILLIS: I do not. We, we do not have contract mechanisms that I could get that funding on contract before the end of the fiscal year.
 - MR. DAVE CARMONA: Thank you.
- MS. PAULA BOND: Cathy?

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- MS. CATHY WUSTERBARTH: Cathy Wusterbarth. We had talked about at the last meeting I think it was, Steve, you know, you said that you had a lot of work; right? This is a big project. You were going to get an assistant or have, having someone to help you. You had -- looked like you had somebody onboard. Is that still the case? Do you have some help?
- MR. STEVE WILLIS: So we, we have advertised the position, we have had candidates apply and we are evaluating the candidates at this point.



1	MS. CATHY WUSTERBARTH: Oh, so three months ago
2	you were doing that I thought, so yeah, we're getting a
3	little impatient here it looks like, so
4	MR. STEVE WILLIS: Yeah, so am I.
5	MS. CATHY WUSTERBARTH: Yeah. This Three Ditch,
6	Three, the Three Pipes Ditch seems like it's low hanging
7	fruit that could be easily taken care of and we are
8	perplexed why you can't take action on that, so
9	MR. DAVE CARMONA: Is the blockage for your
LO	staffing from OPM or from inside your own companies?
11	MR. STEVE WILLIS: It's, it's finding appropriate
L2	candidates. We've had candidates decline, decline the
13	position and so we're still evaluating candidates.
L4	MS. PAULA BOND: Any other questions? All right.
L5	Thank you.
L6	MS. JESSIE HOWARD: Thank you, Paula. At this
L7	time I would like to break for our ten-minute break and we
18	will be back for our second presentation in ten minutes.
19	Thank you so much.
20	(Off the record)
21	MS. JESSIE HOWARD: If I can please have everybody
22	return to their seats? We do have one more presentation
23	this evening from GSI Environmental. We have Janet Anderson
24	and Kirby Tyndall to give us an update on the risk

assessment methodology and the species included in



ecological risk assessment.

(PFAS Risk Assessment Update at 6:37 p.m.)

MS. JANET ANDERSON: All right. Hi, everybody.

I'll give us a second to get situated. All right. As was said, I'm Janet Anderson. I'm a principal toxicologist with GSI and I'm here with my colleague Kirby Tyndall who is a senior toxicologist and risk assessor also at GSI. We are really pleased to finally be able to start talking about our process for the human health and eco risk assessment. We've just started getting the data in so we're going to talk more about the process and how we're moving forward once we complete the evaluation of the data and what we're going to be doing to make some decisions. So next slide, please.

All right. We're going to talk just real quickly about the requirements and the framework for risk assessment. The bottom line is that we follow standard procedures, policies, protocols, guidance from EPA. There's nothing fancy, there's nothing special, we're not deviating from anything. It's a pretty structured framework. EPA has laid out over decades of experience of how to do both human and eco risk and so we're going to be following those.

We're going to talk about the data that's come in and our evaluation process, what data we're going to be using and what compiles the database and we're going to talk about how we're going to use that to model some exposures to estimate



risk. Next slide.

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Okay. So the goals of the baseline Human Health and Eco Risk Assessment. So first of all, baseline means that we're capturing estimated or potential risk, hypothetical based on exposure modeling and estimates as of right now. And that is going to inform then using the measurements of PFAS that we collected from the RI team, and that estimates potential human health risk, estimates potential ecological risk. Importantly we'll help use that information to characterize what's driving decisions and then where might be some key uncertainties to go into some of that data gap discussion. So where might you have a big uncertainty that matters versus an uncertainty that really doesn't change a decision or make a decision one way or another. And so the important aspect is the goal of both the human and the eco risk assessment is to inform risk management decisions. Critically important it's not a public health assessment. That's under the purview of Department of Health and public health agencies. Our goal is just to do a baseline theoretical or estimated risk for human and eco in a way that helps inform decision making moving forward. So it's really important that we understand the distinction between those two. Next slide.

So why do we do risk assessments? It's required under CERCLA. DOD follows the EPA by, by policy, by



statute, follows the EPA process. Baseline risk assessments are required under the National Contingency Plan, Superfund, CERCLA. Next slide.

So, again, what risk assessments do. So we're going to estimate exposures. We do use the measured empirical data from both the biota and the abiotic collection, data collection that was done under the RI, but then we estimate what that means from an exposure from each receptor. And then we characterize the potential for adverse effects, we focus on the key chemicals — in this case obviously PFAS — and, again, that helps support risk management decisions. This does not estimate risk for any individual person or individual real receptor. It does not provide any information on disease, causation, health effects, and it's not going to establish any kind of safe threshold for, for example, fish consumption or deer consumption. Again, that's Department of Health. Very different. Next slide.

The key planning documents that are available for you to review and that help support both the data collection efforts and then our methods and our approach are listed here. Importantly the work plan was written in 2020-2021 time frame, '21 time frame finalized in September of 2022. And obviously things with PFAS move quickly, have changed a little bit so, but, again, the fundamental approach really



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hasn't. So it's really just the toxicity values in which

PFAS are being evaluated that have evolved and we are

keeping up with that science. Next slide, please.

Okay. Data. Is this still me going through?

Okay. Data. Is this still me going through? So all of the data was collected through the RI. Paula and her team are working diligently. We've received actually most of it. We're going through it still, making sure that we can categorize it and organize it in a way for us to use. Paula's really walked through all of that. do have collection of fish from the various waterbodies shown here. We did collect small mammals, so mice and squirrel and plants, so terrestrial and aquatic plants to help inform the bottom of the, that food web. We also are considering any other available data that has been provided to us, provided that it's really relatively recent, so within about ten years, and has a good data package with it that we understand has good quality assurance and quality controls so we know it's valuable and valid data. So we need to have that kind of sampling objectives, the QA documentation. We need to know exactly where it was collected, how it was collected. But we are incorporating any of that data. So, importantly, with all of the hard work and data that's, for example, been collected by some of the state agencies, they've shared that with us and we are for sure bringing in the deer data, the fish data, et

cetera. Next slide.

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So this is the, the current list. So you can see that we are including some of the older site inspection data. For example, they had some older soil data, the muskrat data have been provided to us, again, data from the state fish, deer, muskrat, tree swallows, some older surface water data collected by EGLE, it's informative. So all of that important data have been shared and are part of our database. Okay. Next slide.

This was really just to meant that in the risk assessment we do look carefully at data quality and data validation from the lab and that's particularly important for PFAS and we know especially when detection limits are right at important levels and screening levels. And so really all of this just means that we do include anything even if it's estimated, but as long as it's validated from the lab. So we might see something that has some sort of lab annotation on it. We are including that as a detection in the risk assessment. So I just wanted to say that. That's basically the bottom line of that. But that does help us understand the data spatially. We are going to look at the variability and concentrations both temporally, spatially, vertically, horizontally. We look at different ways to group the data by different exposure receptors. And so we'll be looking carefully at the data quality and, and



usability of all of our data sets. Okay. Next slide.

so the human health specific aspect is the -moving into the exposure assessment first. So the exposure
assessment is a really important part of the risk
assessment. You don't just take the concentrations found in
either the media or the biota and use that directly. We
have to understand how often human receptors might be in
contact with that media, how often they might ingest a
certain, say, an incidental ingestion of soil or how, how
likely is it that a construction worker might be, you know,
ingesting soil while they're digging a trench, for example.
So those types of exposure assessment factors, we call them
parameters, are pretty standard. Tons of data collected by
EPA, by state agencies, national surveys go into that.
They're all peer reviewed, robust sources of information.

We are using some site specific information. For example, the Forest Service has been great to sit down with us a few years ago and provide us with some really good exposure estimates for a hypothetical forest service worker. So that will be considered. We are considering then exposures from current and then hypothetical future scenarios. What that means is hypothetically speaking let's pretend someone wants to build a house right here. That is the most conservative assumption about potential long-term exposure saying you have a, a, you know, young family that



starts a family living in a home. So we do consider that hypothetical future. Or hypothetically say someone wants to do construction next to the runway; right? I mean, we know that's not going to happen today, but say they want to outside of any of these remediation, but like a long-term construction plan.

And then importantly exposures are based on reasonable maximum exposure consumptions. It's not the max. It's not -- it's never sort of worst case scenario but is a reasonable maximum. Meaning it's an upper end assumption that to be conservative, but still kind of a reasonable general population. That's what the risk assessments do both for human and eco. Okay. Next slide.

In the work plan there's a much more detailed conceptual site model. The risk assessors, I don't know, we're a special kind of crazy where we like complicated lines and boxes that represent exposure, conceptual site models. This is my attempt just to simplify it. Again, we're looking at all age groups, sensitive subpopulations, forest service worker, construction worker, potential current occupational worker, future worker, consumption of wild game, fish, recreational use of the surface waterbodies.

We will consider groundwater as a tap water source into a home even though the exposure pathway is largely



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mitigated. But, again, under CERCLA, under EPA guidance, sort of the baseline assuming no mitigation, assuming someone has a private well that they're still using, that will be what our risk assessment considers. But it'll show the impact of what's the impact of no longer having groundwater exposure or tap water in your house. Next slide.

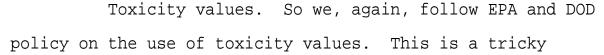
So, again, these are the receptors listed here. Surface soil, subsurface soil are considered. You might ask yourself why would a resident be subjected to subsurface soil. During construction of a home we assume that there might be some of that deeper soil brought to the surface. So, again, reasonable, hypothetical, future scenario we do consider. Consideration of surface waterbodies. And then we are importantly looking at different, all the different potential age groups. We are considering young children, a older child, in addition to the adults. That's because there are different behavior patterns. There are different exposure assumptions. You do have a different ingestion rate of water, a different incidental ingestion of soil. Wе all know that little kids crawling on the carpet have different exposure patterns. So those are all different receptor age groups that will be considered as appropriate.

We even are including though conservatively in the hunter scenario, for example, under the assumption that



may be consuming importantly the game that's brought home. I think next slide. Let me see if I have -- do I have the next slide? No, I'm sorry. So just real quick. The other thing that we are assuming is that any one receptor might be several of these people. So you might have a construction worker who also recreates in Clark's, Clark's Marsh. Or you might have a resident who also then swims in Van Etten Lake. So we will consider cumulatively exposures from several receptors. Okay. Now we can go to the next slide.

So there's a bunch of equations in the work plan, complicated math. At the end of the day, the first thing we do is we try to figure out what does that daily exposure look like. A lot of things go into that: which pathways, how much, what routes of exposure, how long might someone be in contact with the surface water/soil, for example. And for PFAS, the absorption or the uptake, we are conservatively assuming it's 100 percent. So we assume if you do ingest PFAS, 100 percent of that is getting into your body. So I think that if you want more details on the map or as we work through later presentations with risk estimates, this will be the fundamental sort of concept of how that exposure piece is calculated. Okay. Next slide.





topic and a hot button topic for PFAS. But I can assure you we will use the most up-to-date and approved toxicity values. And hot off the press, EPA actually updated their regional screening level or their RSL table yesterday for PFOA and PFOS. We were anticipating that. We were already back calculating those numbers anyway. They usually update their RSL tables every May and November, so they're right on track. But that came from EPA just yesterday for PFOA and PFOS. So per policy for DOD, we use EPA toxicity values first and then consider sort of other tiers to include, for example, ATSDR that has some toxicity values for PFAS. Those will be included. And state values as well. Okay. Next slide.

So once we have that exposure piece, that's simply in the top of the equation and you divide it by the toxicity value and you get what's called a hazard quotient. If it's greater than one, there's an indication there might be potential risk and further evaluation and kind of a deep dive might be warranted and consideration of remedial action. If it's less than one, then we consider the fact that for non-cancer, that there's no increase in risk. We will be considering what's called the hazard index which just is a term that means that we're going to assume additivity of risk for the different PFAS. So we're going to assume that if you're exposed to PFOA and your risk is,



say, .6 which is less than 1, but you're also assume, exposed to PFOS and your risk is also .6, now you've exceeded 1 because you add those two together. That's a really conservative assumption. We don't really have the data to support that as far as there truly is additivity in all doses and target organs, but that is EPA's current policy and it is a standard kind of screening and conservative assumption anyway. It's consistent with the MCLs for the other PFAS that have come out. So that is what we have proposed to, to present for you in risk assessment. That's for non-cancer. Please, next slide.

Cancer risk is becoming more of a, an important topic for PFAS. Previously up until the toxicity information underneath the MCLs it was non-cancer risk that were driving the conversation. EPA's latest interpretation of the data has kind of switched that on its head and now cancer risk is really the driver, meaning it's the most sensitive or critical effect, especially for PFOA. And so what that means is we will include a cancer assessment for both PFOA and PFOS. We have cancer slope factors for both of those from EPA. So they're a little bit different where we still consider sort of that lifetime average daily dose. We think about it as a lifetime of exposure for carcinogens. And we've used standard risk thresholds of excess or theoretical cancer above background in one and a million



to -- that's 1x10 -6 to 1 in 10,000, 1x 10 -4. So we'll be presenting all of that, that standard again. But I just let you know that that is kind of a change in the toxicity narrative and the risk narrative for PFAS and it's important for us to stay up to date with EPA's values. Okay. Next slide.

So an important part of a baseline risk assessment is the uncertainty analysis. I know that might seem a little strange. Isn't the most important part the risk characterization? Yes. But at the end of the day we know where the PFAS are especially here at Wurtsmith. We understand, you know, the media of most concern. The risk assessment will let us know on a more refined spatial scale where there might be some concerns and what media are driving the most important risk so we can prioritize and focus. But the uncertainty analysis lets us ask the questions of, well, what if the toxicity value for PFHxS changes and it's ten fold lower? We can do that in the uncertainty analysis and give you that information so that, to help inform decision making.

What if we assume different exposure scenario for a certain receptor? We can do that in the uncertainty analysis and show you if it impacts decision making. We can talk about where we might have some data gaps. We can look spatially where we have data, understand what risks are



1 driving, and then talk about how we had to maybe model 2 uptake through consumption and gain, for example, and how 3 that compares to some of the other data. So it's really important that this uncertainty in session. 4 5 always done and it's really more of a information for what 6 data gaps matter and what decisions are being driven on what 7 quality of data. And so we'll provide both the qualitative 8 and quantitative assessment of that. I think that's it for 9 the human health. The next portion is eco. Steve, did you want me to pause here for questions on human? 10 11 MR. STEVE WILLIS: Yeah; yeah. Let's go ahead and 12 open it up to questions on the slides we've covered so far 13 and then we'll jump into the eco -- oh, and have O&A after. 14 MS. JANET ANDERSON: Kirby -- yeah. Kirby will 15 take over and talk through the eco, but I'm happy to 16 maybe -- we'll pause here since it's a little, little

MR. DAVE CARMONA: Dave Carmona, Community RAB.

Could you go back to slide 50. I need a little more

explanation on that. You have listed on that current and
future hypothetical resident, but no exposure media to

sediment, surface water, wild game or fish.

MS. JANET ANDERSON: So, right, the resident is at their house. So the assumption is that in their path, well, quarter-acre lot, they're exposed to the soil and then the



different. Yes, sir?

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1	groundwater being used is tap water. So they may be exposed
2	to sediment surface water while they recreate and that's
3	where we'll add those risks together. Does that make sense?
4	MR. DAVE CARMONA: It makes sense but I okay.
5	Next one is slide 52. The toxicity you're talking about, is
6	that environmental or human toxicity on that slide?
7	MS. JANET ANDERSON: Human health.
8	MR. DAVE CARMONA: Human health. Okay. And then
9	slide 54. The cancer risk that you're going to do a
LO	analysis of, is that site specific or based on just guide,
1	general guidance from EPA?
2	MS. JANET ANDERSON: So the cancer risk assessment
L3	will be based on general cancer slope factor for PFOA and
L4	PFOS that we have new from EPA underlying their MCLs. And
L5	it's, again, a theoretical. It's not a cancer assessment
-6	for the community. It is a theoretical what might be an
L7	extra cancer risk above our baseline, you know, cancers that
L8	the community gets.
L9	MR. DAVE CARMONA: So as data comes into this
20	model that you're building, do you have like a team of
21	toxicologists that review this, the peer review that you're
22	talking about, or is this just a literature peer review?
23	MS. JANET ANDERSON: The peer review with the
24	literature work has already been done by EPA's toxicologists

to derive that cancer slope factor. So they have already



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1 said there is a risk of whatever the number is, increased 2 cancer risk for exposure for PFOA. We'll take that number 3 and figure out what the exposure is here. So we're not going to re-do the cancer risk assessment, cancer toxicity 4 5 assessment part. EPA has done that. 6 MR. DAVE CARMONA: How often does EPA update that 7 standard? 8 MS. JANET ANDERSON: Oh, my goodness. Not very 9 often. 10 MR. DAVE CARMONA: Not very often. Okay. 11 MS. JANET ANDERSON: But for PFOA and PFOS, it's 12 they're brand new numbers that they just came out with. And 13 if any other PFAS come up with a cancer slope factor, you 14 know, we'll include it but none of them have, so -- does 15 that answer your question? 16 MR. DAVE CARMONA: Yep. Thank you. MS. JANET ANDERSON: Okay. You're welcome. Yes. 17 18 MR. MARK HENRY: Mark Henry with the RAB. I have 19 a question please. 20 MS. JANET ANDERSON: Sure, Mark. 21 MR. MARK HENRY: Looking at that slide 50 that was 22 just up, you have the exposure media there. One -- well, 23 there's a couple of media that are missing from that list in 24 my opinion. One of them is the foam on the lake and the

other one is the sand on the beach. Young children,



infants, tend to eat sand. I think it's like one in four or one in five consume a significant amount of sand. The sand on the beaches surrounding Van Etten Lake is known to be contaminated from the foam that migrates around the lake, gets deposited on the sand, is blown onto the sand, and then the foam is broken down through dessication and the PFAS in that foam becomes part of the beach and yet the, that as a media for transfer of PFAS into human children is not mentioned here.

MS. JANET ANDERSON: So in the child recreator scenario we do assume a consumption of the "sediment" and I agree with you that's not quite the same as sand, but it is a really conservative --

MR. MARK HENRY: No; no.

MS. JANET ANDERSON: -- assumption that during --

MR. MARK HENRY: No.

MS. JANET ANDERSON: -- children playing that there is a ingestion of that.

MR. MARK HENRY: The sediment is not really the same as the sand.

MS. JANET ANDERSON: I agree.

MR. MARK HENRY: Concentrated PFAS in the foam gets deposited on the sand and it is not flushed out of the system. Through rain and stuff it may go back into the lake where it forms foam again, but as a media that kids are



known to consume, somehow it seems to be missing from this exposure media and I recommend or I request that it be considered in the risk analysis for human health.

MS. JANET ANDERSON: We can definitely include a discussion about the park sand and the actual beach sand that you're talking about as it differs from sediment in the uncertainty analysis and the data gap discussion. And we can look to see what data we might have available as far as ingestion rates of that. We don't have sand data in the RI database.

MR. MARK HENRY: Well, I would recommend that there is a data gap within the RI that should include analysis of sand on the beaches of all the private properties around the lake to determine what the distribution of the PFAS is that is easily accessible to infants and small children. And that once that data is collected as it should be considered during the RI, that the risk assessment include that data during your evaluation.

MS. JANET ANDERSON: Yeah. Thank you for the comment. We'll definitely discuss the sand and the beach in our uncertainty analysis and we'll see where it goes from that.

MR. STEVE WILLIS: Yeah. Mark, this is Steve. I did make a note to consider that for the data gap investigation, beach sand.



1 MR. MARK HENRY: Thank you. 2 MS. CATHY WUSTERBARTH: This is Cathy. I have a 3 question. 4 MS. JANET ANDERSON: Cathy, yeah. 5 MS. CATHY WUSTERBARTH: Okay. It, it sort of 6 piggybacks on what Mark Henry was just saying. We believe 7 that the foam is a glaring omission of this risk assessment. 8 The data is included in a MDHHS and EGLE sampling that you 9 have access to and I've just provided it to Steve Willis. 10 There are more than 50 samples of foam on the waterways that 11 are very high and fort-, fortunately for you that the data 12 exists. And you've also have access to a DHHS report that 13 was provided to the Department of Health in 2019 that breaks 14 down the hazard quotients for incidental ingestion of foam 15 which they declared as a -- I'll read it here from the 16 report. 17 "Incidental ingestion of Van Etten PFAS containing 18 lake foam can result in a public health hazard to 19 children and adults. Extended -- also extended 20 recurring whole body skin contact of Van Etten PFAS

So, again, this is a glaring omission of this assessment. You have the data available and it should be included.

hazard for children and adults."

containing lake foam can result in a public health



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1 MS. JANET ANDERSON: Thank you. 2 MS. CATHY WUSTERBARTH: And I've provided all of 3 that information to Steve. 4 MR. STEVE WILLIS: Yes, I've got that. 5 MS. JANET ANDERSON: Yes, sir. Go ahead. 6 MR. ARNIE LERICHE: Arnie --7 MS. JANET ANDERSON: Hi, Arnie. Yeah, go ahead. 8 MR. ARNIE LERICHE: Okay. Could you -- and I 9 agree with everything that says, especially Mark in that about making it an AI and part of the study. But yesterday 10 11 you answered a similar question to my question, that said 12 that you already because of two AIs, 120 and 123, that asked 13 a similar question about foam and one of them was specific 120 to the issue of in the risk assessment. And so can you 14 15 say --16 MS. JESSIE HOWARD: Arnie, can you --17 MR. STEVE WILLIS: Arnie, can you speak into the 18 microphone? 19 MS. JESSIE HOWARD: -- thank you. He's trying to 20 be polite. 21 MR. ARNIE LERICHE: Can you -- okay. The thing -the point is can you repeat what you said a minute ago but I 22 23 think you were over -- someone was talking over you -- that 24 it's already -- part of the answer is already you've

committed to something and it's in which report that shows



the risk assessment work plan does have a look at the foam
but it's after the phase or it's in the phase of
feasibility, not the risk assessment. So I'm not satisfied
with that. I don't think anyone here is, but it is there.
So that we're asking for a change in what you've already
committed to last year.

MS. JANET ANDERSON: Correct. If I understand what you're saying, we do acknowledge the foam, foam exists. It is listed in our conceptual site model with a dashed line meaning we're not quantitatively evaluating it. And what the comments that we're hearing loud and clear here are to move that into the quantitative assessment. So we haven't ignored the foam. We acknowledge that it exists and it already is mentioned and discussed in the work plan.

MR. ARNIE LERICHE: Okay. And in one of those AIs we got a commitment from Steve that by spring of this year -- this was committed to six months ago -- that you would contact the authorities and maybe even Jennifer Fields to have a conversation to see if those experts and with EPA would have a presentation on this foam to really kick the thing going with those agencies because EPA has to get involved before the Air Force is really going to get serious about this. And could you commit to giving us an update of the one conversation that you had?

MR. STEVE WILLIS: Yeah. So we, we did have a



The Air Force, EGLE, EPA Region 5 and we also 1 2 included Courtney --3 MR. ARNIE LERICHE: Carigan. 4 UNIDENTIFIED SPEAKER: Carigan. 5 MR. STEVE WILLIS: -- Carigan, thank you, on that 6 conversation about foam. I did commit previously that we 7 would put together a panel to discuss foam, but I have not 8 had the opportunity to -- other than some initial calls, I 9 have not had a chance to follow up and actually put that 10 together. Part of that I wanted to wait until we had the, 11 this risk assessment discussion to get feedback and 12 discussion here and then we'll work towards some kind of a 13 panel discussion on foam. 14 MR. ARNIE LERICHE: I wish you had told us that, 15 that, that the spring one has changed so I -- but can you 16 give us the, a writeup of what the conversation included 17 from the agencies? 18 MR. STEVE WILLIS: I can, I can put some, a 19 summary together, yes. 20 MR. ARNIE LERICHE: Okay. And it could be 21 attached to the AI so it's in a detail you want. MR. STEVE WILLIS: Yeah, it'll be -- yeah; yeah; 22 23 exactly. 24 MR. ARNIE LERICHE: Thank you. 25 MR. DAVID WINN: Janet, I have a question.



1	MS. JANET ANDERSON: Yes, sir.
2	MR. DAVID WINN: This is Dave Winn. You mentioned
3	yesterday in the tech review that in some cases you were
4	going to use overall, overall state average for some
5	portions of this because the data specific to Van or to
6	Oscoda is not available; is that correct?
7	MS. JANET ANDERSON: If you're referring to the
8	fish consumption ingestion rate, we're using national survey
9	data that is specific to the Midwest. And it is shown to be
LO	more conservative than some of the Michigan specific data
1	that we've reviewed.
L2	MR. DAVID WINN: So fish is the only one?
L3	MS. JANET ANDERSON: I think so, yes. I mean, the
L4	only I mean, outside time, you know, time spent playing
L5	outside is obviously specific to Michigan, but
L6	MR. DAVID WINN: Okay. So just that one specific
L7	item?
18	MS. JANET ANDERSON: I believe so.
<u> 1</u> 9	MR. DAVID WINN: Okay.
20	MS. JANET ANDERSON: I'm trying to think our deer
21	ingestion, wild game might be from DNR, but I'm not sure.
22	Yeah. It'll be listed. We can certainly we'll all of
23	the sources of the exposure information will be provided in
24	the table.

MS. KIRBY TYNDALL: In the report.



1 MR. DAVID WINN: Thank you. 2 MS. JANET ANDERSON: Yes, sir? 3 MR. SCOTT LINGO: Scott Lingo, Community RAB. 4 looking at some of the testing that was done on the fish -we discussed this briefly in our last meeting. A lot of 5 6 fish were not fish that are consumed on a regular basis. 7 They were shiners, they were chubs, they were minnows, they 8 were darters, they were, you know. We didn't look at 9 walleye, we didn't look at perch, we didn't look at, you 10 know, the fish that local residents are going to consume. 11 You know, we aren't eating that stuff. We're eating 12 walleye, we're eating pike. And those two species are 13 carnivores. They eat all the little fish, you know. And I, 14 and I didn't see any of those tested. Can you tell us why? 15 MS. JANET ANDERSON: We have an extensive -- I 16 think it's perch that we have almost from every waterbody. 17 They're all listed on the table or in the poster in the 18 back. We do have a lot of perch and we got --19 MR. SCOTT LINGO: But they weren't Yellow Perch I 20 don't --21 MS. JANET ANDERSON: They were Yellow Perch, 22 that's right. 23 MR. SCOTT LINGO: Were they? Okay. 24 MS. JANET ANDERSON: And we got --25 MS. KIRBY TYNDALL: We did have some Large Mouth



1 Bass. 2 MS. JANET ANDERSON: -- and some bass, Large Mouth 3 and Small Mouth Bass we did collect. So for upper levels --4 MR. SCOTT LINGO: But why no walleye, why no pike? 5 I don't know anyone -- does anyone in this room go out to 6 catch and eat bass? 7 MS. JANET ANDERSON: We tried. I mean, you can 8 talk to our fishermen who went out. 9 MS. KIRBY TYNDALL: Well, and it represents the carnivore in the food chain of fish and so it may not be 10 11 exactly walleye, but it's a representative carnivore that 12 should have a similar body burden. I, I understand that 13 they --14 MR. SCOTT LINGO: But I use different lures to 15 catch bass than I do walleye. 16 MS. JANET ANDERSON: Right. But the -- we model 17 the amount of perfluorinated compounds as they go up the 18 food chain. So where we have data at different trophic 19 levels, empirical data, help inform for the next higher 20 level as well. So as long as we have representative species 21 like the, the bass and the perch, then we can help 22 understand and that whole trophic level. So everything that 23 has similar behaviors and foods. 24 MR. SCOTT LINGO: Okay.

MS. JANET ANDERSON: And we don't do a risk



assessment specific on fish species. So it's going to be consumption of fish, is there a risk, yes or no.

MR. SCOTT LINGO: Okay.

MR. DAVE CARMONA: Dave Carmona, Community RAB.

I'd like to go back to your comment about the foam that you are considering moving into the quantitative model. My understanding the information we've been given in the past is there is no standardization for testing and checking foam. Are you saying that there is now?

MS. JANET ANDERSON: No, I am not. I haven't committed to moving it. That's been part of the Air Force's concern is the val-, validity of the data. But I haven't looked at the data that was just provided to Steve. So my understanding is there are questions about the testing, standardization of the testing of the foam, there's concerns about the wide variability and the concentrations that are often detected. But we'll look at the data.

MR. DAVE CARMONA: So this -- okay. I understand you're going to look at the data. You have literature out there on how to make foam, three to six percent solution in a truck to spray it on a fire. So you have base data to establish the levels that caused the foam out there. Is there not a scientific way to validate that information in the environment or to create a model to look at that as to, to compare what we know from the literature to make foam



compared to how it's going on the lake? The level has to reach that concentration to make foam through aeration. It seems pretty simple.

MS. JANET ANDERSON: The aqueous film forming foam concentrated solution is very different than the foam that is forming on surface waterbodies. Those are two different things. Foam, yes. Foaming through aeration, yes. But aqueous film forming foam as a solution concentrated, the chemical product full of a bunch of stuff. And, yes, it's diluted three or six percent through an aerator as it's dispersed. That's very different than the foaming behavior on a surface waterbody.

MR. DAVE CARMONA: Is there any way you can build a model to look at the two based on what your observations are, the scientific analysis of the foam here? Because it seems to me unless you have that, Steve's conversation about the consideration of foam is going to be having "Oh, we don't have a scientific method, so let's not consider it." That's not to cast aspersions on you.

MS. JANET ANDERSON: Yeah.

MR. DAVE CARMONA: But if you don't have scientific data or a model to build, what's the point of the conversation or even giving us a hope that you're going to put this in the quantitative model?

MS. JANET ANDERSON: Right. I mean, to my -- I



- 1 would assume that that would be part of the questions that 2 Steve would be posing to his panel, can this even be done. 3 Right? 4 MR. STEVE WILLIS: Yeah. At this point we are not 5 going to collect foam under the current RI contract. continuing to evaluate foam and if it's a data gap that 6 7 needs to be addressed, we can address it in the data gap 8 investigation. You know, we've already committed to 9 sampling the soil on, on the edges of the lake where foam deposition occurs. If, if the data supports collecting foam 10 11 and including that in the risk assessment as a follow-on 12 activity, we can do an update to the, or an addendum to the 13 risk assessment to incorporate that as appropriate. 14 MS. JANET ANDERSON: And I want to clarify, again, 15 the point of the risk assessment is to inform remedial 16 decisions. So the question about whether you include or 17 exclude foam should be about, well, would it change how 18 you're approaching a remedial design and that's how we 19 should approach that kind of discussion not from a public health risk, again, which has already been well covered by 20 21 Does that --POH. 22 MR. DAVE CARMONA: Yep. Thank you.
- 23 MS. JANET ANDERSON: -- help with a distinction?
- 24 Yeah.

MS. CATHY WUSTERBARTH: Cathy Wusterbarth again.



1 If you could go back to slide 46? This is where it's, like 2 I had mentioned, it's glaringly missing off of this media. 3 Right? You have soil and the sediment and water, all of 4 that, so but foam is not on there. And some of these people 5 were not in the meeting yesterday and I made a statement about how we would like to see the foam included in this 6 7 assessment but I don't think it was explained why you're not 8 including it. And I think you gave me an answer yesterday, 9 but didn't quite understand it. Maybe you can explain that 10 again?

MS. JANET ANDERSON: Sure. We've been directed to not include it for some of the reasons we've already mentioned. One, questions about analytical methodology and validity of the data; two, the variability in the concentrations and how representative any data set might be; three, is the intermittent exposure potential, so would a given receptor population be exposed in a significant enough exposure rate and duration that it would impact their overall exposure to change or risk and how we would estimate that, model that. It's a, it's an unknown how we would do that.

MS. CATHY WUSTERBARTH: So what I heard you say yesterday in our technical session about this is that you would consider any data that came from a reputable source and in this case it's the State of Michigan and they have



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- thoroughly tested foam across the state. There are hundreds
 of results in that report that I gave Steve which I'm
 certain you must have because it has the surface water
 results in it also. So and it's, it's very unclear to me
 why you would not consider the State of Michigan's very
 thorough testing on foam.
 - MS. DENISE BRYAN: And health advisory --
 - MS. CATHY WUSTERBARTH: Yes, and the -- and as our District Health Department person says we have health advisories. It is clearly a risk and it is -- will just be incomplete and you can add that now if you want to, if you choose to, and you're just refusing.
 - MR. DAVE CARMONA: And this goes back to your initial statement. This is to evaluate potential exposure paths. This is an exposure path. I've seen kids playing in this foam. Okay. Scott has played in it, so --
 - MS. CATHY WUSTERBARTH: And, you know, with, with Steve's boss here -- Roger, is that right? Roger? Yep. I would ask that you, you address this.
 - MR. REX VAUGHN: This is Rex Vaughn, Community RAB. I've got a question. I heard a comment a couple minutes ago about somebody told you not to include foam in your analysis. Can you tell us who that was that told you not to do that?
 - MS. JANET ANDERSON: No, I just -- it was not part

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- of the scope of the RI event or the RI component period. We don't have foam data included in the RI.
 - MR. REX VAUGHN: All right. You -- I did not hear the complete answer over this virtual connection. Could you repeat your total answer? My question was who told you not to include it?
- 7 MS. JANET ANDERSON: It was not included in the 8 scope of the RI from the Air Force.
- 9 MR. REX VAUGHN: Okay. So you're not telling us
 10 who told you not to do it?
- MS. JANET ANDERSON: Well, it's not a "don't include it," it's "here's your scope of the RI." Right?

 There's a contract that's awarded with the scope.
 - MR. REX VAUGHN: All right. So it's the Air Force that told you not to do it? I want to make that clear. Who told you not to include foam in your analysis?
 - MR. STEVE WILLIS: Foam, foam, foam was not included in their scope of work for evaluation in the risk assessment. And that came from the Air Force.
 - MR. REX VAUGHN: Okay. So we're back to the Air Force again. I want to make sure that's clear for everybody in this meeting. That the Air Force is restricting what data can be included.
- MR. DAVE CARMONA: So a question about the scope issue then. Dave Carmona. Since governmental contracts and



- 1 work are tied to scope, are you that hide bound to the scope 2 that you would not consider changing the scope because it 3 has the potential to change the contract? 4 MR. STEVE WILLIS: Yes. As I indicated earlier. 5 if -- we'll continue to evaluate foam. And if it is a data 6 gap that we need to address, we'll address it in the data 7 gap investigation. It is not in the scope or the funding 8 for this contract. 9 MS. CATHY WUSTERBARTH: But the work is already 10 done. MR. REX VAUGHN: I'm going to call BS on that 11 12 statement. 13 MS. CATHY WUSTERBARTH: Yeah, the work is already 14 done, so -- I do have a, a question about sort of what Rex, 15 Rex's addressing who. One of the action items is -- has 16 been on the list for a little while, is a chain of command 17 request for, for BRAC. Are you still working on that? 18 when can we see that? 19 MR. STEVE WILLIS: I am and I hope to have 20 something within the next couple weeks to you.
- MS. CATHY WUSTERBARTH: Okay. Again, I would ask
 Roger to make sure that that gets done because this has
- 23 been --
- MR. STEVE WILLIS: Yep. He and I have been talking about it.



MS. CATHY WUSTERBARTH: -- we've been waiting for 1 2 a military chain of command for a very long time. 3 MR. STEVE WILLIS: For, for clarification, is that 4 chain of command for the BRAC structure? 5 MS. CATHY WUSTERBARTH: For decision making at 6 this site. 7 MR. STEVE WILLIS: Okay. And do you want --8 MS. MICHELLE BROWN: So actually -- this is Michelle Brown, Steve, if, if you don't mind. I believe 9 that that information is readily available. It's readily 10 11 available online. We can provide the link to the members on the RAB if they need that information. The chain of command 12 13 for any Air Force organization is, is available online. 14 can provide that link to you. We can put that link in the 15 chat for this group and we can also provide the, the 16 document in PDF form if, if that would be helpful as well. 17 MS. CATHY WUSTERBARTH: One other question. 18 Cathy. 19 MR. ARNIE LERICHE: But on that same issue, that 20 includes budgeting. It isn't just decision based on 21 technical whatever, okay, and CERCLA. It's the budgeting 22 also affects everything. So --23 MR. STEVE WILLIS: That, that's all within the 24 organization.

MR. ARNIE LERICHE: I'm talking about budgeting



- above you, getting into the president's budget rather than
 wait for crumbs that are left over halfway through the year.
 Just a thought.
 - MS. CATHY WUSTERBARTH: Okay. Yeah, I have a, a, a separate question about the risk assessment in general. From what I understand this is the public's only opportunity to have input on this assessment. After this it will be provided, you know, back to the Air Force and then at that point it will be put into other documents and then it'll be published. No, no further public comments. Is that right?
 - MR. STEVE WILLIS: That's correct.
- MS. CATHY WUSTERBARTH: Okay.
- MS. JANET ANDERSON: Yes, Arnie?
 - MR. ARNIE LERICHE: Arnie Leriche, the RAB. I have a different opinion in something you said, Janet, about that the foam -- you don't see how the foam could affect anything regarding -- and put these words in -- regarding on this, on that slide where the receptors or the decision for remediation. And I have to disagree with that because the foam comes up to the surface and it's not visible immediately. It's always there in what's being called as the micro layer. And the kids are being exposed to that and the signs do not cover that that the Health Department put up because they only say wash and it's not blaming anybody. The science and the acknowledgment that that foam is, that

material PFAS, probably mostly PFOS, is on the surface of 1 2 the lake almost 100 percent of the time, so therefore the 3 risk of exposure is a lot higher than what's being assumed 4 in the risk assessment and it's not as high as the visible 5 foam that you see. It gets much higher for that. But the 6 other thing is we've brought up a couple of times over the 7 last six years that that foam, the currents of the lake and 8 the wind bring that foam to the dam. It's on the surface. 9 And ultimately it does go through the dam into Lake Huron. 10 And we brought up the fact of it should be investigated on 11 how much pounds per day, pounds per on a mass basis is going 12 through there in a year to see if it warrants. And I would 13 say it does warrant some review for reflection as an IRA. 14 So --

MR. STEVE WILLIS: And we have done, as part of the RI, we have done surface water sampling both in the lake and in the river downstream of the dam and so we've got that data available.

MR. DAVID WINN: Steve, I want to make a -- the surface, the surface water data that you've collected around the, the lake, at what depths, Paula? At what depths were that surface water taken?

MS. PAULA BOND: Six inches and three and a half feet.

MR. DAVID WINN: Okay. Not on the surface of the



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1 wa-, of the water? 2 MS. PAULA BOND: The zero to six inch, yes. 3 MR. DAVID WINN: Okay. So not the micro layer? Not specifically the micro layer, 4 MS. PAULA BOND: 5 no. 6 MR. DAVID WINN: Where all the PFAS is. 7 MR. STEVE WILLIS: But it does include the micro 8 layer as well as that interval down to six inches. 9 MR. ARNIE LERICHE: But that guidance is going to be changing if anyone in DOD looks at Jennifer Fields' study 10 11 because they did two reports out to the public that say 12 there's a high bias when samplers go out to sample surface 13 water if they're not below the surface before they start any 14 sampling because it gets concentrated on the surface. 15 constantly coming through the waterbody column to the 16 surface. 17 MR. STEVE WILLIS: I'll, I'll look at her latest 18 I saw a presentation by her that indicated that --19 she did a field evaluation of sample collection and sampled 20 it with a sample container right at the micro surface, she 21 sampled it putting the, the sample container down below the 22 surface and opening it and she also did it with a open 23 container going through the micro layer and down into the 24 water and collecting the sample. And statistically there

was no signif- -- no significant difference between the



- three methods. Now I don't know if she's changed that since
 that time or not.
- 3 MR. ARNIE LERICHE: And that's sampling from Van 4 Etten Lake?
- 5 MR. STEVE WILLIS: That I -- no, I don't believe 6 it was specific to here.
- 7 MR. ARNIE LERICHE: No, I don't think so, either.
- 8 MR. STEVE WILLIS: I think it was just PFAS 9 sampling, surface water sampling in general.
- 10 MR. SCOTT LINGO: You need to do it here.
- 11 MR. ARNIE LERICHE: Well, the foam's got to be
 12 there for it to ever indicate a difference. We got to be
 13 careful here. I appreciate you mentioning that. I'd like
 14 to get a copy of that, please.
- MS. JANET ANDERSON: Yeah.

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MS. DENISE BRYAN: Denise Bryan, Public Health,
Health Officer. I just wanted to say that I do feel the
hazard quotient will be significantly statistically under
reported for the risk to human health and I understand it's
not a public health study. But what I really want to say is
I did a literature search in 2013, and there was, there was
a void of information and data on PFC's. That, that's what
it was called back then. And that our residents and
veterans really are looking for this data and we understand
it doesn't have public health implications. But in the

limbo with no data, having it be reliable becomes really important factor for decision making. But also for extrapolation for the veterans that were on the base and, you know, worked with the foam and we did do water testing of some of the back drains that was water that existed. And so I just feel as if a accurate hazard quotient would be calculated with the study which would need to include the foam, that it also is a then a reliable data that we could provide to our community members and without it I think there's going to be a significant, statistical concern with your data. And reliable data is important to us. Thank you.

MS. JANET ANDERSON: Shall we move on to the eco portion? It'll go a little faster because similar theme. So I'll turn it over to Kirby.

MS. KIRBY TYNDALL: Great. So we'll start with there's a lot of parallels between the human health and ecological risk assessment process so I may kind of go through these slides pretty quick. But Janet was just talking about the, the steps that we go through to do the human health process. This is kind of the big picture, fundamental elements to the baseline ecological risk assessment because we were aware that PFAS compounds are bioaccumulative. We didn't really do the first two out of the eight-step EPA process which is the screening level

evaluation. So we jumped right in to the BERA. We designed in the problem formulation part of the work plan, the RI work plan, we indicated what kind of, what the focus of the assessment would be, developed the conceptual site model in the work plan and made recommendations for different biota sampling that would be necessary for our ecological risk assessment. We looked at exposure for the different receptors that I'm going to talk about a little more in just a minute, and then at the end you make estimates about the adverse effects, potential effects to the various receptors. So next slide, please.

So you start really quick by screening your data with some standard toxicity values or screening levels by media, similar to what you do in the human health risk assessment. EPA does not have -- for example, there's not any soil screening levels from EPA or the various states for the PFAS compounds in soil, but SERDP and Argonne National Laboratory have developed some so we'll be using those in our evaluation. For surface water EPA proposed in 2022 a draft water quality criteria, a tier one water quality criteria, which has a lot more data available for use in the derivation of it. But California has adopted some, SERDP has evaluated and provided some, as well as Argonne National Laboratory and we'll be using those data to screen our surface water data and the risk assessment. Tier two water



quality criteria or water quality standards are, have been divi-, developed by various states and also by SERDP and Argonne National Laboratory. And sediment screening levels have only been developed by SERDP. But we'll be using, similar to the human health risk assessment, we'll be using regulatorily-derived values or other values that are available in the literature, peer reviewed literature.

We're not inventing anything here. We'll be using toxicity values and benchmarks that are derived by others and have some regulatory authority behind them generally. Next slide, please.

When we look at our ecological receptors, pathways and routes, we kind of start at the bottom of the food web and then build our, our way up. The base of the food web is generally used for the prey consumption. It's the -- and it's the plants and the microbes and things like that and then you work into the other organisms that you might be concerned about and then for those higher trophic level organisms, the herbivores, carnivores and omnivores, you'll look at the environmental media that they eat, and then you choose indicator species for your evaluation based on the relationships in the food web and the different feeding guilds. Next slide, please.

And for this site we looked at several terrestrial ecological receptors. They may not be your exact favorite



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ones that you, you might want to protect here, but we're looking at all the different feeding guilds. So we've got a tree swallow that represents an insectivore, I believe, an American Robin, that's more of an omnivore. It'll eat worms, but it eats a lot of seeds. And so we look at literature-based values from EPA and other things for ingestion rates for all of these different species. Red-tailed Hawk is obviously higher in the food chain and eats primarily small rodents. And so we collected some rodent data for this evaluation. We can model uptake into other foods, food and prey items if we don't have the data. We collected terrestrial plant data that we'll use. We can model terrestrial invertebrate concentrations that animals such as the shrew and the vole will be eating. We've identified an Eastern Cottontail as well raccoon for our terrestrial indicator species. Next slide please.

So we identified similarly, we identified several aquatic ecological receptors that'll be evaluated. So unlike human health where we look at, you know, a human: child, adult and adolescent, we look at all of these various species individually with their own assumed ingestion and der-, contact pathways. So we also are look -- we'll be considering a Mallard, a Spotted Sandpiper. The Spotted Sandpiper was chosen because they eat a lot of sediment while they're feeding so they have an increased exposure



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The Belted Kingfisher is a, it eats through that pathway. primarily small fish. So the question was asked about we don't really eat chub, but this, that information will be 4 used directly to assess exposure for the Belted Kingfisher. Likewise, the Bald Eagle, we'll be looking at variable fish. He eats bigger fish than, say, the kingfisher. So we'll be 7 looking at a whole body concentration for the fish that we caught that an eagle might eat. Same with an American Mink. 9 They'll eat some fish. They'll have some reptiles, they'll eat frogs and different things. So we're looking at their exposure by each different indicator species and we have represented all the different feeding guilds in these var-, for these various habitats. So we'll look at the microphytes and algae in the water, as well as the invertebrates that might be there. We'll model what their concentrations would be. And then assume, calculate with the body burden for the pumpkinseed, bluegill, and the trout will be, too. And, again, that Brown Trout may not necessarily be the fish that's most prevalent in that area, but we'll use that body burden that we estimate for the trout to represent pike and walleye and steelhead because they're in the same trophic level in the feeding guilds. 23 Next slide, please. 24

So then we ask part of the assessment, end point assessment of the BERA is, are a couple of key questions



1 that we're trying to protect or predict in our evaluation. 2 What concentrations of the COPECs -- the COPEC is an acronym 3 for Chemicals of Potential Ecological Concern -- on- and 4 off-base within the Project Boundary sufficient to cause decreased survival, growth, and reproductive of local 5 populations of our indicator species? Are the COPEC 6 7 exposures and risk estimates significantly greater than the reference areas? We have col- -- we'll have collected -- we 8 9 have collected or I quess Aerostar really did, collected data in reference areas so that we can compare to kind of do 10 11 some ground truthing with what we're estimating using our 12 uptake models and exposure assumptions. So if yes, is there 13 an evidence -- is there evidence of an ecological, biological impairment? And then are risk estimates 14 15 dominated by specific COPC- -- C-O-P-E-C, COPEC, in a 16 particular exposure medium? Is it in a particular area that 17 has elevated risk? So this really informs the FS as to what 18 media and where we should be focusing efforts. Next 19 question -- or next slide, please. 20

So this, so for the animals that eat other animals or that eat vegetation, we have to estimate -- if we don't have the data for it, we will estimate using standard media to tissue bioaccumulation factors and model what their daily intake would be. And this has provided the assumptions -- or the bioaccumulation factors are provided in the risk



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assessment work plan. They're derived generally by EPA or provided by others from the literature. So those are fully described in the risk assessment work plan already. Next slide please.

And this is just an overview of the ecological risk assessment characteriza- -- risk characterization that we'll go through. We go through the screening level which we really are not doing because they're bioaccumulative. Focus those compounds for the, that are the of greatest concern, greatest potential concern in the ecological -- baseline ecological risk assessment. And then at the end of the process you look at the risk description that interprets risk estimates by lines of evidence so you can wrap all of that in, synthesize it into something that makes sense and helps guide any remedial activity for ecological receptors. Next slide, please.

And similar to calculating risk for humans, you're going to divide exposure by the toxicity value that we identified which, again, they're usually developed by EPA or another regulatory agency or we'll find appropriate values in the literature. You'll divide the exposure by that toxicity value and come out with a hazard quotient. You will generally if it's less than one, there's a high likelihood that there's not going to be any impacts to that ecological receptor. And if the hazard quotient is greater



than one, that indicates that there is a potential for impacts to the ecological receptor and that might warrant further evaluation. Next slide, please.

Similar to the human health risk assessment you look at your evaluation and identify any uncertainties because we often will be multiplying a highly conservative assumption like exposure or ingestion rates to the, the high end or the 95th percent upper confidence limit of your data. And these, these uncertainties can compound so you'll want to look at them, at, at your risk estimates at the end of your evaluation to identify sources of uncertainty. Sometimes you'll do a qualitative assessment of that or a quantitative analysis if you have enough information. And that just helps inform the confidence of the evaluation. Next slide, please.

So key take home points for both evaluations. The Air Force follows applicable risk assessment guidance and policy; human exposure can potentially occur var-, via various pathways including fish and game. And we feel like we've got a comprehensive list of exposure receptors and pathways and they'll be, as Janet indicated, some of them will be aggregated if you're a resident and you also fish, those will be added together. Ecological receptors will include fish, invertebrates, plants, mammals, and birds. And their exposure of the food chain is evaluated in that,



in, in the BERA.

And the science and the regulatory landscape continues to change rapidly as we saw yesterday. EPA came out with some new values for us to include. So I'm, we're all very happy that it happened yesterday and not the end of July or something that we're having to re-run all our numbers. We stay abreast of that, those changes and it's, as you can imagine, it's a rapidly evolving field. And then things to watch: DOD policies, USEPA guidance, changing PFAS toxicity information. It's -- there's lots to watch out for and, and keep your eye on, so -- next slide, please. Any questions for the ecological risk assessment process?

MR. DAVE CARMONA: Dave Carmona. How do the biota receptors HQ information inform the human receptor factors or are these separate and independent for different uses?

MS. KIRBY TYNDALL: They're separate and independent. I mean, the fish information will be obviously used in the human health risk assessment. But it, like -- well, for fish for human health you look at the filet data whereas for an ecological receptor you look at the whole body concentration since the, the critter that's eating it eats the whole fish.

MR. DAVE CARMONA: Okay. There's no chance that if you get an HQ less than 1 say in fish, say in the trout that you sample, is there the possibility that you could



1 eliminate that from HO's portion of the human factors? 2 MS. KIRBY TYNDALL: No. Those would be completely different, so --3 4 MR. DAVE CARMONA: Okav. 5 MS. KIRBY TYNDALL: So it may be possible that 6 the, the risk to the fish itself is acceptable, but the ri-, 7 risk to the human consuming the fish may not be. 8 MR. DAVE CARMONA: Okay. 9 MS. KIRBY TYNDALL: Does that, does that --10 MR. DAVE CARMONA: Yep, makes sense. Thank you. 11 MS. KIRBY TYNDALL: Uh-huh. 12 MS. AMY RAUSER: Rex Vaughn has a question on the 13 line. 14 MS. KIRBY TYNDALL: Rex? 15 MR. REX VAUGHN: Yeah, this is Rex Vaughn, 16 Community RAB. I'm a little puzzled that there's not more 17 customization in the, in the analysis to the species that 18 actually exists in the area. You know, and it goes back to 19 an earlier question about why didn't you include pike and 20 walleye which they tend to be a very popular species and may 21 have different, different individual biology that makes them 22 different in how they absorb PFAS compounds. And I, I don't 23 think we got any kingfisher around here. Why, why are we 24 using that bird to be part of the evaluation when, you know, 25 you ought to be looking at blue heron or some of the other

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- species that are prevalent in the area. Is it because of
 lack of data or it a standardization in the procedures? Why
 can't you customize the species to the area where you're
 actually studying?

 MS. KIRBY TYNDALL: Well, it, the kingfisher
 - MS. KIRBY TYNDALL: Well, it, the kingfisher represents that feeding guild and we will be looking to, you know, if it, if there's a heron available, he probably eats about the same amount per body weight. So we pick species that there's information about their dietary patterns and consumption rates. So we pick species for that. And then also smaller home ranges because that means that they're eating in this area a longer period of time. So all those things get considered.
 - You know, if there's a specific species that, you know, is here that wasn't evaluated, I mean, we can certainly point you to the, the surrogate that we used in the evaluation. But the kingfisher is often present in, in areas where there's water.
 - MR. REX VAUGHN: But possibly not around here. That's the point.
 - MR. GREG SCHULZ: I have them at my house.
 - MR. SCOTT LINGO: Yeah. They're here.
 - MS. KIRBY TYNDALL: I mean, I don't know. I --
 - MR. SCOTT LINGO: Yeah, there are.
 - MR. REX VAUGHN: I've never seen one on my beach.



1 Let me put it that way.

MS. JANET ANDERSON: We, we did have the Forest Service review our species selection and had a discussion with them, too, to confirm, again, representative species. We're not trying to pick, you know, every and all species or the most common. We're trying to make sure we identify representative species from different feeding guilds and trophic levels and ones that we have really reliable data on their consumption patterns.

MR. REX VAUGHN: Oh, that's why -- that's what it comes down to is the availability and reliable data is what you're really limited by; is that correct?

MS. JANET ANDERSON: Well, yes, yeah. But we do want to make sure it is representative of all the feeding guilds and trophic levels that are here, and we did solicit input from the biologist and the Forest Service as well.

MS. KIRBY TYNDALL: And we will definitely be looking at the, the EGLE collects fish data. They have walleye data. We'll be looking at that and comparing it to what this, the RI data suggests. But, so it's not that we're not going to at all look at walleye, but we collected what we collected, or --

MR. REX VAUGHN: Yeah. I, I think, I think the local community, community would be a lot more confident in your, in your results if you did include some very popular



1 local species. 2 MS. KIRBY TYNDALL: Okay. Thank you. Yes? 3 MR. SCOTT LINGO: Scott Lingo, Community RAB. 4 When you're mentioning the different fish, the kingfisher, 5 or, excuse me, the different birds and mammals, the 6 kingfisher and that, are those species collected here 7 locally around Wurtsmith Air Force Base or is that a species 8 list that was given to you by, say, the Forest Service or 9 MDNR that said these are typical species within our area and then you have taken data from different locations and 10 11 applied that to this area? 12 MS. KIRBY TYNDALL: Yes. I mean, usually 13 they're -- I mean, the, the kingfisher's ingestion rate is 14 provided by EPA, like --15 MR. SCOTT LINGO: Okay. But so you haven't 16 collected species, those species around Van Etten Lake? 17 That's just data that you've pulled out that was collected 18 somewhere in the Midwest and not here within Iosco County, 19 Oscoda Township, Van Etten Lake area? 20 MS. KIRBY TYNDALL: No, we didn't go collect a 21 bunch of kingfisher data, but we can model what his body, 22 body burden is based on the data that we did collect and 23 that's very typical of an ecological risk assessment. I 24 don't feel very good collecting a bunch of animal data. I



mean, --

1 MR. SCOTT LINGO: Well, --2 MS. KIRBY TYNDALL: -- because it kills them. 3 MR. SCOTT LINGO: -- I don't feel very good living 4 here and knowing that you're pulling data from the Midwest 5 and not Iosco County, though, you know. That's what we're all trying to find out is what is the effect of consuming 6 7 our local fish, our local deer on human beings and our 8 children and future generations? We want to know what's 9 affecting us here locally, not data brought in from South Dakota, North Dakota, Minnesota, you know. We want to know 10 11 what's happening local. So to me, all of this data that 12 you're talking about doesn't apply to Oscoda. 13 MS. JANET ANDERSON: I'm confused, I think. 14 I'm confused about what data doesn't apply to --15 MR. SCOTT LINGO: Well, you're talking about these 16 samples and, and you're looking to put together this health 17 risk quotient but you're not looking at species that are 18 here, they haven't been collected here to detect. MS. JANET ANDERSON: All of the concentration, all 19 of the PFAS concentration data from either biotic or abiotic 20 21 media are here, local, and we'll use that to model to the 22 species we don't have data for. What Kirby was talking 23 about is sort of ingestion rate and, like, the, what the 24 food web looks like, how much insects does the kingfisher

eat versus water ingestion. That stuff is extrapolated from



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- data everywhere. That's not specific to Oscoda. But the concentrations of PFAS are all local.
- MR. REX VAUGHN: All right. Let's remember the kingfisher is a tropical bird. I don't think Oscoda is tropical.
 - MR. SCOTT LINGO: Well, I guess I just don't -- my understanding, when I think of a sample I would think it of, you know, okay, well, let's see if this substance is found in a local species that might feed on fish along the Pine River or Van Etten Lake, you know. I guess that's, that's what my assumption was.
 - MS. JANET ANDERSON: Right.
- MR. SCOTT LINGO: So perhaps I misunderstood.
- MS. JANET ANDERSON: So that --
- MR. SCOTT LINGO: When you say sampling.
- MS. JANET ANDERSON: Right.
 - MR. SCOTT LINGO: To me sampling is I go out, I'm going to troll. I'm going to put -- give you five walleye, you're going to cut, you know, a chunk of the flesh and test it and see if that PFAS is there.
 - MS. JANET ANDERSON: Yes; yes. And that, the Aerostar team and our subcontractors, the biologists, did that locally here. There is maps back there that show you where they customized with squirrel --
 - MR. SCOTT LINGO: Yeah, I, I'm familiar with that,



1 but they didn't test the walleye and they didn't test --2 MS. JANET ANDERSON: They were out fishing. 3 mean, --4 MR. SCOTT LINGO: Well, the wrong quy's doing it. 5 MS. KIRBY TYNDALL: But we'll use the, we'll use 6 the EGLE's walleye data. 7 MS. JANET ANDERSON: We'll use the EGLE data for 8 here. 9 MR. SCOTT LINGO: Okay. MS. KIRBY TYNDALL: To make sure it's similar with 10 11 the, the Largemouth Bass --12 MR. SCOTT LINGO: Okay. So EGLE did in fact pull 13 walleye from Van Etten Lake? 14 MS. KIRBY TYNDALL: Yeah. Well, I don't know 15 exactly where, but I saw samples of Walleye. 16 MR. SCOTT LINGO: Okay. I'm kind of curious as to 17 when they did it as well because the Pine River and the 18 AuSable River is a migratory path for walleye. So they 19 might have got walleye that typically reside within Lake 20 Huron and only go up into those tributaries to spawn so 21 they're there for a relatively short period of time. So if 22 I were conducting a sample, I'd be on Van Etten Lake 23 probably in August or July when the likelihood of any 24 migratory fish being within that body of water are very low. 25 MS. AMY HANDLEY: So I just want to add. The



1 samples that EGLE collected, that's what WRD has done for 2 the fish advisories if I'm correct. So I, I can't remember 3 exactly when, but they, that's been ongoing across the So they do have data from here and many other places 4 5 so they, they use it holistically, too. So I just wanted to 6 add that. 7 MR. SCOTT LINGO: So it's not site specific? 8 MS. KIRBY TYNDALL: Well, no, they --9 MS. AMY HANDLEY: They do have it from here. 10 MS. KIRBY TYNDALL: Yeah. 11 MS. AMY HANDLEY: But I'm just saying, like, they, it's not just here. Like they have stuff specific to Van 12 13 Etten Lake, they have stuff specific to every lake that they 14 have collected fish from, so --15 MR. SCOTT LINGO: Okay. Thank you so much. Τ 16 appreciate the clarification. 17 MS. KIRBY TYNDALL: Anybody else? 18 MR. MARK HENRY: Mark Henry. As long as were 19 asking questions. Could you please turn back to slide 64 20 where it talks about the ecological risk est-, risk est-, estimation? You explained the hazard quotient here better 21 22 than the description that is provided for the hazard 23 quotient for human health earlier in the presentation.

Saying that the hazard quotient less than or equal to one,

no great impacts. And if the hazard quotient is greater



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I recall, I think it was MDHHS did -- circling back to foam.

MDHHS calculated the hazard quotient for foam on Van Etten

Lake and they did it for humans and they found the hazard

quotient to range from 6 for adults to something like 38 for

children. So the hazard quotient has been calculated for

foam, it is very high and yet it is not included in the risk

assessment. It just seems to be omitted on purpose.

MS. KIRBY TYNDALL: I mean, I, I think we understand everybody's concern about that. We do not have any -- so the, the risk assessment, the baseline risk assessment, whether you're talking about ecological or human health looks at the data that we've got in RI because that's the effort here that can be tied back to a remedy. We can qualitatively evaluate it. We can carry over the MDHHS's recommendations or summary. We can certainly consider it. It's on our conceptual site model. I don't know that I can do anything, we can do anything more than that.

MR. MARK HENRY: Figure out a way to include it in the overall evaluation of the risks for the site. It just seems so glaringly obvious that it is a, a, a mass transport pathway and that that pathway intersects both ecology and human health and yet it is omitted from the risk assessment by the Air Force by design. It was not in your scope of work. So I would just like to point that out. Thank you.



1 (RAM Member Questions at 7:57 p.m.) 2 MS. JESSIE HOWARD: All right. Thank you, ladies. 3 At this time I would like to open the floor to any 4 additional RAB member questions and then we'll do public comment after that. Do we have any other questions from the 5 6 RAB members at this time? Cathy? 7 MS. CATHY WUSTERBARTH: I do, yes. Actually, I 8 would like to acknowledge Senator Peters' office is here, 9 Kelly Lively, and we appreciate her taking the trip to come over here. So this, this question about the foam is this is 10 11 not the last time we're going to talk about that because we 12 do have congressional staff that, that pay attention to 13 what's happening here at Wurtsmith and we'll, we'll be 14 talking about it with them, so -- and I'd also like to 15 acknowledge that senator, State Senator Hoitenga's office is also on the line, online. So appreciate their attendance at 16 17 our, at the meeting, so --18 MS. JESSIE HOWARD: Thank you, Cathy. Yeah, Mr. 19 Palmer? 20 MR. BILL PALMER: Yes. This is Bill Palmer. I'm Oscoda Township Supervisor. I've been involved with this 21 22 RAB since its inception. And the primary focus of this RAB 23 has always been PFAS. There's good reason for that. 24 very dan-, dangerous group of chemicals that's affecting our

water and everything around us. But there are other



1 chemicals that are on the base that have been identified by 2 the Air Force before the base closed, hence the various 3 plants, the Mission Street plant, and the -- oh, what's the 4 other one? -- the --5 MR. MARK HENRY: Benzene plant. 6 MR. STEVE WILLIS: Arrow, Arrow and Benzene, yeah. 7 MR. BILL PALMER: -- Benzene plant, yes. 8 are related to a group of chemicals called volatile organic 9 chemicals. These, these were, came from, you know, jet fuel spills, gasoline spills, diesel spills, hydraulic oil, motor 10 11 oil, any of those types of substances that have been used by 12 the Air Force over the decades that this force, this air 13 base was in place. And my question, it's a couple of phase 14 question, and that is we've only been discussing PFAS, but I 15 believe -- and, Steve, you can correct me if I'm wrong --16 that the, that GAT filtration does remove the VOC chemicals 17 from the groundwater if it, if it's there; is that correct? 18 MR. STEVE WILLIS: That's correct. 19 MR. BILL PALMER: And it does, does it foul up 20 the, the carbon filtration systems? 21 MR. STEVE WILLIS: It, it does have a tendency to 22 shorten the life of the carbon, yes. 23 MR. BILL PALMER: Okay. And the other part of the

question is and what brought this to my mind is when we're,

now we're at this step where we're doing a, a health



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assessment of the, of the, of the base and the only thing that's being considered are the PFAS. And I'm wondering if the VOC chemicals are being considered as part of that investigation or will be at some point because those chemicals still exist on the base. At one, at one point they were flowing off the base, was one of the reasons that the Air Force extended a water main down M-41 across from the base because people were turning on their taps.

The stories I've heard when they turned on their tap water it smelled like kerosene. So those chemicals -- but the Benzene plant, the Mission Street plant, all the years that those operated did remove some of those VOC chemicals, but they are, and my understanding is they're still present on the base. And so when we're doing a health assessment, I'm wondering if any of that is taken into consideration. Thank you.

MS. JESSIE HOWARD: Yes, Arnie?

MR. ARNIE LERICHE: Arnie Leriche, RAB. I'd like to look at one of the action items. It's on page 2 of the handout for ongoing. And this one relates to the storm sewers, when were they last sampled and how often was the sampling program basically for those? And that was a year and a half ago when I asked that. In May of last year almost to the day, it was the 17th of May last year, Beth updated us saying that the first round of sampling was done



and was done, completed, and they're awaiting the second 1 2 round of results, so a second sampling, but that was a year 3 ago and they're waiting for results and there's not been an update of this. And somehow I talked to Mike Munson from 4 5 the airport representative and, and so who is watching that and what's the status of it? And if an answer could come 6 7 out in the near future unless you have one, you know? 8 MS. AMY HANDLEY: I'll have to check with our WRD 9 staff because they're involved in, in monitoring that. That's not my office specifically but I'll check in with 10 11 them and see what they have and then I'll get back to you on 12 that, Arnie. 13 MR. ARNIE LERICHE: I'd also suggest that the Air 14 Force track who owns which storm sewers and any other 15 property if it's not obvious in the transfer because your 16 knowledge about the, that storm sewer is who owns it. Do 17 you know? 18 MR. STEVE WILLIS: It, it depends on where it is. 19 Some of it's owned by the airport, some of it's owned by the 20 township. 21 MR. ARNIE LERICHE: So below the outfall -- I 22 mean, to the outfall, is that one owner? 23 MR. STEVE WILLIS: I don't think it's that clear 24 cut. 25 MR. ARNIE LERICHE: No, I mean not to the river.



1 That's a different figure; right? Those? 2 MR. STEVE WILLIS: No. I'm saying the, the storm 3 water system on the former installation boundary in some 4 areas is owned by the airport, and some areas is owned by 5 the township. I think the township owns the predominance of 6 it, but there --7 MR. ARNIE LERICHE: Okay. 8 MR. STEVE WILLIS: -- it's not a clear this 9 belongs to one and this belongs to the other. There's some 10 segments that span between owners, so --11 MR. ARNIE LERICHE: Okay. Could there be a color 12 coded just for that? Map done? Because it's going to be 13 potentially a problem of which agency of those two is 14 keeping their thumb on the Air Force to, to get it done to 15 fix the leaking conduits. 16 MR. STEVE WILLIS: We, yeah, we could put a color 17 coded map together. 18 MR. ARNIE LERICHE: Appreciate it. 19 MS. JESSIE HOWARD: Did we have any other 20 questions from the RAB specifically? No? Not at this time? 21 MR. ARNIE LERICHE: One real quick one. 22 MS. JESSIE HOWARD: Okay, Arnie. Go right ahead. 23 In the slide 50 on the risk MR. ARNIE LERICHE: 24 assessment, there's a term "project boundary." Now we've

heard a lot from the Air Force about the boundary of --



1 property boundary of the Air Force when it was active here; 2 right? 3 MR. STEVE WILLIS: Uh-huh. MR. ARNIE LERICHE: And that does not include what 4 5 may have been leased I don't think, but that's not my 6 question. My question is the project boundary, what's the 7 definition of "project" to know where the decisions -- we 8 would like to know how and where the decisions were made on 9 where some of these risk assessment, the species and so 10 forth, the sampling. I know that there's a map that shows 11 locations, but what drove you to make those based on --12 MR. STEVE WILLIS: That's -- that is a good 13 question and we are working on site boundaries. Obviously 14 the plumes extend beyond installation boundary. And so we 15 are, we are working on establishing boundaries that'll be used both for the risk -- the RI and the risk assessment and 16 17 then I will use them for funding, to track funding because I 18 have to track all of my funding against a site. 19 MR. ARNIE LERICHE: Okay. 20 MR. STEVE WILLIS: So, so we are in the process of 21 establishing the site boundaries for both the RI and the RI 22 report.

MR. ARNIE LERICHE: Because at one time about a

year and a half ago you had a map that showed on the east

side, on the southeast side of the base, the old gate



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- basically, that, that exit from the base, that the plume, one of the plumes went on the east side of Van Etten Creek and you had a plume over there. Some of it was estimated -- I don't know if there was a sample taken over there, so that would become --
 - MR. STEVE WILLIS: So the boundaries will incorporate all the plume that's been delineated. There's actually site boundaries in the, in the original UFP QAPP for the RI. There's a, there's a map in there that's got several different boundaries. It's got IR -- the legacy IRP sites. It also identifies all the AFFF areas, and then it also has four PFAS boundaries but those PFAS boundaries that are in that QAPP don't incorporate all the plumes now that we've done all the stepouts and all the delineation. And so we are in the pos-, process of evaluating the extent of the contamination and matching up site boundaries with that.
 - MR. ARNIE LERICHE: Amy, is your division involved in tracking that with them or -- this is not news.
 - MR. STEVE WILLIS: They, they have not -- they, they have not been involved in those discussions. Those are all ongoing internal Air Force discussions at this point.
- MR. ARNIE LERICHE: Sounds like a thing, though.

 It's something that needs to be done.
 - MR. STEVE WILLIS: Oh, absolutely.



Once we --

1	MR. ARNIE LERICHE: Okay.
2	MR. STEVE WILLIS: That's why we're doing it. And
3	when
4	MR. ARNIE LERICHE: So could it be added to the
5	BCT meeting next week? So at least
6	MR. STEVE WILLIS: No. It's not something that
7	we're ready to discuss yet.
8	MR. ARNIE LERICHE: The concept that you're doing
9	it is what I'm getting at because we rely on EGLE quite a
LO	bit to protect us from contamination. So, anyways, I'll
L1	stop there.
L2	MR. DAVE CARMONA: So, Steve, basically what
L3	you're saying the original boundaries of this were
L4	established in the scope and that was the base outline and
L5	now you've seen where it's moved off the base and so you're
L6	expanding the scope of what you're doing for looking for
L7	PFAS and contamination based on your data stepouts?
18	MR. STEVE WILLIS: So, so at this point we are
<u> 1</u> 9	establish we're working on establishing boundaries based
20	on the extent of the contamination that has been identified
21	in the RI. The boundaries that were in the work plan are
22	much smaller. We now know that contamination in groundwater
23	extends much further in several directions. We've also
24	identified PFAS in soil that exceeds criteria that is not

currently captured in a site boundary. We need to expand



- the boundaries to incorporate that so when they do the risk assessment they include all those sample locations in the data.
 - MS. JESSIE HOWARD: Okay. I know that we do have a question from Mark Henry virtually. Mark, go ahead when you're ready.
 - MR. MARK HENRY: Oh, good. Sorry, Tony. This ties right in with Arnie's question about project boundary. Does the project boundary for the risk assessments include the area between Van Etten Lake and Lake Huron where contaminant, PFAS contamination has been found within a stone's throw of Lake Huron in that direction?
 - MR. STEVE WILLIS: At this point we're still working on the boundaries. So it, it'll -- the boundaries will encompass all the, all the data we've collected and are using for the RI.
 - MR. MARK HENRY: The residential well data that MDHHS has collected is not part of the RI and as far as I know, the Air Force has not conducted any investigation to the east of US-23. So will the project boundary include the detections of PFAS in residential wells between the east side of Van Etten Lake and Lake Huron?
 - MR. STEVE WILLIS: I can't answer that question at this point, Mark. We're still looking at the data.
 - MR. MARK HENRY: Thank you.



(Public Comment at 8:10 p.m.)

MS. JESSIE HOWARD: Okay. So I'm just going to quickly review the public comment guidelines and then we will begin with that portion. Rule number one, please raise your hand either if you're here in person or if you're with us virtually. Number two, when I acknowledge you, someone if you're in the room will bring you a microphone or I will ask you to speak when you're ready if you're with us virtually. Please remember to say and spell your name for the record. Number three, please keep your comment to three minutes or less. And number four, remember that your comment will be addressed at a later time if the RAB members determine that a follow-up is needed. I know that we do have Tony with us virtually who would like to give a public comment. So, Tony, go ahead and address the RAB when you're ready.

TONY SPANIOLA

MR. TONY SPANIOLA: Thank you, Amy (sic). My name is Tony Spaniola. Last name is S-P-A-N-I-O-L-A. And I just want to make some comments to put some things in context. I think that, that many of the concerns that have been raised tonight by the RAB members are eminently reasonable and I think some context will perhaps help even further to illuminate their concerns. With regard to the foam, there is in fact a very detailed health analysis that was done by



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the Health Department in 2019, and that's been discussed already. The hazard quotient came in between 6 for adults, 38 for kids. That's astronomically high. And I think that it's important to understand when you come to Oscoda, when you live in Oscoda, particularly around the lake, there's foam everywhere and it's a constant reminder of the fact that we've been at this now -- we're in the 15th year and we're still having foam pile up all over the place. And when we look at the history of what's going on with the foam discussion -- and this involves people who were not on the Air Force side of things now, but going back to 2017 when this originally came out, and we were originally told by the Air Force that the foam was from washing machine detergent. And so the concern about the Air Force coming at this with blinders on is pretty deep seated. So the, the comment here tonight, and we understand it's not in the scope of work, but I think what's being said, at least the way I feel about it is let's -- we have an opportunity to make it right, let's make it right, let's include it in the analysis and the analysis will be complete. With regard to the analysis, the fact that essentially this is it, this is the only comment we can informally or formally allowed to make without even seeing it, I would ask the Air Force to consider providing a draft of the, of a risk assessment to the RAB and to the community before it's finalized so that



we don't get to the end and have questions come up after the fact that really, you know, could be addressed and resolved prior to its finalization.

I also want to point out the concerns that were raised tonight about the Three Pipes drain. Again, just briefly to put it in context. Three Pipes dumping large amounts of PFAS directly into the AuSable River and those pipes are located right next to a beach. We're not talking, you know, a mile away, a half mile away. We're talking right next to a beach. That's the concern. And as we talk about beaches and concerns, I switch for a moment -- and I just want for the record to state that there is a continuing concern and I hope it's going to be addressed, that the Alert Aircraft Area interim remedy excludes the beach at the public campground and doesn't include the entire plume. That's just for the record just to point out that that's a continuing concern that we have that we hope is addressed.

And, finally, I would just like to say that there's been an issue brought up before that, again, for the record we need to do testing under Van Etten Lake. We've talked to a number of experts, a number of CERCLA experts and given the situation it is eminently reasonable and in fact we're, we're being advised required. I hope that's something that will get incorporated into the, the, the RI and that action will be taken on it. Thank you and thank



1 you all for coming. Thank you to the RAB members for their
2 hard work.

MS. JESSIE HOWARD: Thank you, Tony. Did we have any other members of the public who would like to make comment?

MS. KELLY LIVELY: Just a --

MS. JESSIE HOWARD: Oh, he's going to bring you a microphone real quick.

KELLY LIVELY

MS. KELLY LIVELY: Kelly Lively, L-I-V-E-L-Y, from Senator Peters' office. And I guess we're talking about the foam and trying to include it in this scope. My question would be how do we change the scope? How fast can we change that scope to include it? Like what is your procedure and how can you report that back so that the members of the RAB can be satisfied that that can be done? And then the Three Pipes. All I can say about the whole Three Pipes thing is that tonight I kept hearing information go back and forth that I couldn't really understand and come up with a clear picture of when the work would be done or when the testing would be done. The questions -- the answers seemed to ob-, obfuscate a clear answer.

MS. JESSIE HOWARD: Thank you, Kelly.

JOHN JANIAK

MR. JOHN JANIAK: John Janiak, J-A-N-I-A-K. I



1	work with USA Jet Power on the base. We're a tenant of
2	OWAA. Our number one concern for the vapor intrusion is the
3	safety of our people and we will continue to seek clarity
4	and confirmation that the current situation in the shop
5	right now is that there is no imminent health hazard or
6	mitigation required at this point. And we'd, we'd like some
7	support to hear further from MDHHS, their opinion. We, we
8	heard your statement this morning or this evening. It was
9	quick. So I'd ask for a copy of that in writing so that I
10	can deliver it home and we take a, a good view of what's
11	going on. So thank you for your time.
12	MS. JESSIE HOWARD: Thank you. Anybody else with
13	us in the room who would like to make a public comment?
14	Amy, do we have anybody else virtually who'd like to speak?
15	MS. AMY RAUSER: Nope.
16	MS. JESSIE HOWARD: No? Okay. If there are no
17	other public comments, I would like to turn this over to our
18	co-chairs for their closing remarks. Mr. Willis?
19	(Conclusion at 8:17 p.m.)
20	MR. GREG SCHULZ: This is Greg Schulz. I'm
21	just want to thank everybody for coming out. We've had some
22	great discussion tonight and I think that's healthy and look
23	forward to seeing remedies put in place.

MS. JESSIE HOWARD: Thank you.

MR. STEVE WILLIS: And I'd also like to thank



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everyone for coming out. It was good to see a couple new
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     faces from the community. It's always nice to see
     additional people wanting to get involved in this. Thanks,
 3
     everyone. Have a great evening.
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               MS. JESSIE HOWARD: Thank you.
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               (Meeting concluded at 8:18 p.m.)
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1	CERTIFICATE
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4	I, Marcy A. Klingshirn, a Certified Electronic Recorder
5	and Notary Public within and for the State of Michigan, do
6	hereby certify:
7	That this transcript, consisting of 132 pages, is a
8	complete, true, and correct record given in this RAB meeting
9	on May 15th, 2024.
10	I further certify that I am not related to any of the
11	parties to this action by blood or marriage; and that I am
12	not interested in the outcome of this matter, financial or
13	otherwise.
14	IN WITNESS THEREOF, I have hereunto set my hand this
15	28th day of May, 2024.
16	
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18	Marcy a. Klingshein
19	v
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21	Marcy A. Klingshirn, CER 6924 Notary Public, State of Michigan
22	County of Eaton My commission expires: March 30, 2029
23	The commission charges hards 30, 2025
24	
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