

	MEETINGAugust 21, 2024WURTSMITH RESTORATION ADVISORY BOARD MEETING1
1	WURTSMITH RESTORATION
2	ADVISORY BOARD (RAB) MEETING
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4	Oscoda United Methodist Church
5	120 West Dwight Street, Oscoda, Michigan 48750
6	Wednesday, August 21, 2024, 5:01 p.m.
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23	RECORDED BY: Marcy A. Klingshirn, CER 6924 Certified Electronic Recorder
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August 21, 2024 2

1	RAB CO-CHAIRS:	Mark Henry Steven Willis Dir Force
2		Steven WIIIS, AII FOICE
3	Local Government Stakeholder RAB Department Members Present:	Denise Bryan, Local Health Tim Cummings, Oscoda
4 5	Township	Chelsea Gary, MDHHS Amy Handley, EGLE
6		Michael Munson, OWAA
7	Community RAB Members Present:	Dave Carmona William Gaines Kyle Jones
8		Arnie Leriche Scott Lingo Greg Schulz
9 10		Greg Schulz Rex Vaughn (via Teams) David Winn
11		Cathy Wusterbarth
12	Also Present In Person:	Darlene Abbott Megan Berry
13		Kalan Briggs Summer Cox
14		Robert Delany Greg Ganganuss
15		Jessie Howard Andrea Keatley
16		Travis Kirin Kelly Lively
17		Wendi Michael Jeremiah Morse
18		Bill Palmer Amy Rauser
19		Andrea Stawry
20		Hannah Theodorovich Roger Walton
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# August 21, 2024 MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING 3 1 Also Present Virtually: Amanda Armbruster, Matt Baltusis, Charles Bauer, Cynthia Bell, 2 Dorin Bogdan, Paula Bond, Grace Borst, Michelle Brown, Tom Brown, 3 Jenni Dorsey-Spitz, Garret Ellison, Tiffany Evans, Stela 4 Fuentez, Krystal Gurnell, Jenny Haglund, William Howard, Kenny 5 Johnson, Mike Kovacich, Peter Lepczyk, Mathew Lipiec, Charles 6 Major, Jocelyn Marsack, Tess Nelkie, Tammy O'Neill, Ravi Ravichandran, Jim Romer, Sydney 7 Ruhala, Joann Socash, Cory Tackett, Nathan Wayne, Mark 8 Weegar, Fernanda Wilson, Robb, 9 Jeff, Cathy. 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 💋 ESQU

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1		TABLE OF CONTENTS	
2			PAGE
3	1.	Welcome and Introductions	5
4	2.	Stakeholder/RAB Member Updates	9
5	3.	RAB Business Update	47
6	4.	PFAS RI and IRA Updates	48
7	5.	RAB Member Questions	108
8	6.	Public Comment	
9		1. Tony Spaniola	141
10		2. Bob Delany	144
11		3. Kelly Lively	146
12	7.	Conclusion	146
13			
14			
15			
16			
17			
18			
19			
20			
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23			
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Oscoda, Michigan

Wednesday, August 21, 2024 - 5:01:09 p.m.

MS. JESSIE HOWARD: Hello. And welcome to the August 21st, 2024, Restoration Advisory Board public meeting. I'm your facilitator, Jessie Howard. Irving Entertainment Studios is recording and live-streaming tonight's meeting, and we are also joined by our court reporter, Marcy.

9 I just want to give a quick reminder to the RAB 10 members to please remember to speak into the end of 11 those microphones. It's even more important tonight. 12 We have the beautiful new wood floor in here, but it 13 does create more of an echo for everybody else. Also, 14 please remember to state your name for the record and 15 for those of us attending virtually.

16 Now, I will turn the floor over to our17 co-chairs for their opening remarks. Mr. Willis?

18 MR. STEVE WILLIS: Yeah. Good eve- -- good
19 evening, everyone, and welcome. Got another exciting
20 RAB meeting here.

21 22

MS. CATHY WUSTERBARTH: Exciting?

22 MR. STEVE WILLIS: Some snickers from the crowd 23 here. I'm looking forward to tonight and let's go ahead 24 and, and get started. Mark?

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MR. MARK HENRY: I'd like to thank everybody



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING
1	who attended and I hope you have questions. This is the
2	place to get them answered. So come up with questions.
3	We hopefully will have a fair amount of time at the end
4	of this for going over those. Thank you.
5	MS. JESSIE HOWARD: Okay. I am quickly going
6	to take attendance of our RAB members. I'll begin with
7	the Government RAB. Steven Willis with the U.S. Air
8	Force?
9	MR. STEVE WILLIS: Present.
10	MS. JESSIE HOWARD: Bill Palmer, Oscoda
11	Township?
12	MR. TIM CUMMINGS: No, that'd be Tim Cummings.
13	MS. JESSIE HOWARD: Oh, okay. Eric Strayer, Au
14	Sable Township? No Eric. Amy Handley with EGLE?
15	MS. AMY HANDLEY: Present.
16	MS. JESSIE HOWARD: Michael Munson with OWAA?
17	MR. MICHAEL MUNSON: Here.
18	MS. JESSIE HOWARD: Denise Bryan with the
19	Health Department?
20	MS. DENISE BRYAN: Present.
21	MS. JESSIE HOWARD: And Chelsea Gary, Michigan.
22	Department of Public Health?
23	MS. CHELSEA GARY: Present.
24	MS. JESSIE HOWARD: And Jessica Stuntebeck with
25	the U.S. Forest Service? Okay. Now we have the



#### August 21, 2024 MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING 1 Community RAB members. Mark Henry? 2 MR. MARK HENRY: Present. 3 MS. JESSIE HOWARD: Dave Carmona? 4 MR. DAVE CARMONA: Present. 5 MS. JESSIE HOWARD: Bill Gaines? 6 MR. BILL GAINES: Present. 7 MS. JESSIE HOWARD: Kyle Jones? 8 MR. KYLE JONES: Present. 9 MS. JESSIE HOWARD: Arnie Leriche? 10 MR. ARNIE LERICHE: Present. 11 MS. JESSIE HOWARD: Scott Lingo? 12 MR. SCOTT LINGO: Present. 13 MS. JESSIE HOWARD: Greg Schulz? 14 MR. GREG SCHULZ: Present. 15 MS. JESSIE HOWARD: Josh Sutton will be joining 16 us a little bit later today. Rex Vaughn? 17 MR. REX VAUGHN: Present remotely. 18 MS. JESSIE HOWARD: All right. David Winn? 19 MR. DAVID WINN: Present. 20 MS. JESSIE HOWARD: And Cathy Wusterbarth? 21 MS. CATHY WUSTERBARTH: Here. 22 MS. JESSIE HOWARD: All right. Now I'm just 23 quickly going to review tonight's agenda. First off, 24 welcome and introductions, then we will have RAB member updates followed by the RAB business update, then we 25



1	will have updates on the PFAS RI and the Alert Aircraft
2	Area IRA, then we will have RAB member questions
3	followed by public comment, and then the conclusion of
4	tonight's meeting.
5	At this time do we have any state or local Air
6	Force or DOD officials who would like to introduce
7	themselves?
8	MR. GREG GANGNUSS: Yeah, Greg Gangnuss with
9	the Air Force Civil Engineer Center.
10	MS. JESSIE HOWARD: Thank you, Greg.
11	MR. ROGER WALTON: And Roger Walton with the
12	Air Force Civil Engineer Center.
13	MS. JESSIE HOWARD: Thank you.
14	MR. KALAN BRIGGS: Kalan Briggs, EGLE
15	Superfund.
16	MS. JESSIE HOWARD: Thank you.
17	MS. MEGAN BERRY: Megan Berry, EGLE out of Bay
18	City.
19	MS. SUMMER COX: Summer Cox, Michigan
20	Department of Human Services.
21	MS. ANDREA KEATLEY: Andrea Keatley, Michigan
22	Department of Health and Human Services.
23	MS. HANNAH THEODOROVICH: Hannah Theodorovich,
24	Michigan Department of Health and Human Services.
25	MS. AMY RAUSER: Jessie?



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1	MS. JESSIE HOWARD: Yes.
2	MS. AMY RAUSER: I have someone online who is
3	raising their hand. Jim Romer, did you have something
4	you wanted to say? You'll have to unmute yourself.
5	MS. JESSIE HOWARD: Do we have somebody else
6	virtually, Amy?
7	MS. AMY RAUSER: Jim Romer, did you have
8	something you wanted to say? You'll need to unmute
9	yourself.
10	MR. JIM ROMER: No. I was just going to I
11	was just going to mention that the, the volume of, of
12	the vocals is pretty low. If you all can increase that
13	at all that would be helpful. Thank you.
14	(Stakeholder/RAB Updates at 5:05 p.m.)
15	MS. JESSIE HOWARD: Thank you. Okay. At this
16	time we can move on to the RAB member updates. The U.S.
17	Air Force update from Mr. Willis?
18	MR. STEVE WILLIS: Next slide please. So just
19	a quick update. I know we've talked about this in the
20	past, the contractor, where the contractor was
21	originally awarded came in and did a presentation with a
22	big, broad overview of the project, but we are doing
23	another remedial investigation here at Wurtsmith. This
24	one is for the military munitions response program.
25	We have delayed the field work for that a



little bit. We're still working through some access
 issues and vegetation cutting issues with the Michigan
 Department of Natural Resources but we expect to start
 that work next month.

For the vapor intrusion remedial investigation, we've provided a couple of updates. Our contractors come in and done some presentations, but just a real quick summary of progress since the last RAB meeting. We have finished both the first and second quarter of sub-slab and indoor air sampling for the four buildings identified with the potential hazard. The reports for both of those sampling events are available on the admin record.

Just a quick note that the admin record is actually down for maintenance. It should be back up tomorrow. So beginning tomorrow you should be able to access those reports.

We have completed the third quarter of sampling and we have briefed those results to both EGLE, the Health Department, as well as the Airport Authority and the tenants of those buildings and we are working on that report now and as soon as that report is final, we'll add it to the administrative record as well.

And as part of that contract it was split into two segments that immediate, immediate sampling, the



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1 investigation of the four buildings which I just talked 2 about, and then the rest of the base is incorporated in 3 the RI at a broader scope. And so we started the first 4 -- or finished the first round of soil gas sampling in some of the areas where we had legacy VOC plumes. And 5 so based on that initial results we're planning the next б 7 phase so I'll have an update at the next meeting on 8 that. Next slide?

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MR. MARK HENRY: I have a question about that. MR. STEVE WILLIS: Yeah, go ahead, Mark.

MR. MARK HENRY: I have a question. This is Mark Henry. I have a question about the vapor intrusion study that's ongoing. Have any other buildings besides those identified previously to the RAB shown vapor intrusion issues?

MR. STEVE WILLIS: So, so far we have not identified buildings within the footprint of plumes that would warrant indoor sam-, air, air sampling, but we've just started that first phase. So there, there is a potential.

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MR. MARK HENRY: Thank you.

22 MR. STEVE WILLIS: But we haven't gotten to 23 that point and collected that data to make that 24 determination. Since the last RAB meeting we did have a 25 senate represent or staffers from the Senate Committee



1 on Homeland Security and Governmental Affairs here at 2 Wurtsmith for a tour. That was on the 29th of May. We 3 did take them, covered quite a bit of ground. We took 4 them to the Central Treatment System, we took them to Three Pipes Ditch and we actually walked down from, from 5 6 the outfall where the storm water system dumps into the 7 ditch and then took them all the way down to Three Pipes 8 at the Au Sable River.

9 We took them to, over to FT02 as well as to the 10 Wastewater Treatment Plant System lagoons and the 11 seepage beds. We took them up to the Alert Aircraft 12 Area IRA construction location. This was prior to 13 construction starting, but we did show them where the 14 treatment system would go. And then we took them over 15 to Ken Ratliff Memorial Park.

On the 26th of July, I did transmit to Mark Henry to share with the rest of the RAB all of the data that we've collected to date for the PFAS remedial investigation. So it was Excel tables with all the results as well as the maps. So the community does have access to all that information.

22 For the -- and Paula will have an update on it, 23 but for the Alert Aircraft Area IRA, we did sign the 24 interim record of decision and did start construction the end of July on that system. Based on feedback from



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both the community and from EGLE, the Air Force did hire a contractor, a contractor you're all familiar with, Noblis, to do an independent, third-party evaluation of the system and the, the effectiveness in meeting the objectives for that system.

And so we, we have received that draft report and the Air Force is in the process right now of reviewing that draft report and then we'll provide feedback to the contractor. But our plan is to have that report final by October and we will share that report with the RAB.

Just some initial findings from that report. It did identify that there were, there were too few monitoring wells up gradient of the treatment system. This was also a comment we received from EGLE on the work plan and we agree that that is a shortcoming with the system. So we are in the process of adding additional up gradient monitoring wells for that system.

One of the other things highlighted in the report which we've already, which we had previously addressed simply because of the cutoff in data we provided, it wasn't, had not been incorporated in the data package submitted to Noblis for review. But we did as part of the RI identify an area or in the, in the area that the extraction wells were going to go where



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1 the clay is about 10 to 15 feet deeper than it is the 2 rest of the base. The system was originally designed to 3 install the extraction wells about two feet off of the, 4 the clay layer at the bottom. And based on that deeper 5 clay layer in this area, we had already changed the б design for the well screens to incorporate and extract 7 the well from that 10 to 15 foot supposed gap.

8 So it, it was a, it was a -- I guess it was new 9 information that came out of the RI that was incorporated in real time into the design and so that, that perceived deficiency had been addressed already but 12 it just had not been incorporated into the package that 13 was submitted to them. And as I said, the report should 14 be final by October which will be before our next RAB 15 meeting.

So the plan is to do a, some type of a 17 technical session with the community to present the 18 findings of that report. It will give you guys an opportunity. We'll get you the report, schedule the meeting, you'll have an opportunity to look at that report and we'll have the technical session and you can 22 ask questions.

23 Next slide. So yesterday which was the 20th, 24 not the 19th as indicated on the slide, we did have another tech, tech session. We have one of these in 25



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conjunction with each of the RAB meetings. We did have a presentation by a firm out of Marquette, Michigan, MycoNaut, and they did a presentation on the research 4 they're doing on fungi as a means of remediating PFAS.

They're early in their research stages, but it's something that we'll keep tabs on. It may have application here at Wurtsmith, it may not. It may be an opportunity for some type of a, a field demonstration or pilot study, but it's something that we'll keep an eye on.

11 We did have a RAB member do a presentation on 12 the data he's collected regarding foam at Van Etten Lake 13 and then the rest of the meeting was open to Q&A from 14 the RAB members and the public and we spent some time talking through the need for additional sediment 15 16 sampling in some areas.

17 We did have a 3D visualization tool that shows 18 the groundwater plume. All of our plume maps of which 19 are in the back and which we've been showing for several 20 years now are simply a plan view, the extent of the 21 plumes. But this gave you a vertical understanding of is the plume in the shallow, is it in the mid, or is it 22 23 in the deep part of the aquifer. We could rotate it, 24 move it around. We could show down to the lowest 25 concentrations we've been tracking. You could bring it



up a level and show concentrations of above 100, above 500, above 1,000. So you could see the extent of the plume and where the high concentrations really are, both spatially across the installation, but also vertically within the aquifer. So feedback I got was that that was a well received demonstration and so we'll continue to have that tool available and use it.

Last thing is our next four RAB meetings are listed here on the schedule just for everyone's benefit for planning purposes. The next one will be on the 20th of November, the first one in 2025 is on the 19th of February, followed by the 21st of May, and then the 20th of August of next year.

14 Next slide. So as I've been indicating for 15 probably the past six months or a year there are things 16 in the RI that we need to still finish. We've 17 identified data gaps based on the data we've collected. 18 And so we are in the planning phases of that next 19 investigation. We're actually meeting in EGLE's office 20 tomorrow to go through the list of items, get any 21 additional input from EGLE. And once I get that list 22 finalized, I will share it with the RAB and solicit any 23 comments or input from, from the community on that. But 24 our plan is to award the contract and start that next 25 phase of investigation early next year.



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The field work would, would align with the summer time frame. The first part would be a work plan. And as I indicated in the tech session we will leverage the existing UFP QAPP for the PFAS RI and write an addendum to that to cover any new work that's not already covered. So it will be a much smaller document.

And as we did with the last addendum to the UFP QAPP, we will share that with the RAB members at the same time we share it with EGLE for review and comment. I expect again that it will be a fairly small document and so we're looking for a fairly quick turnaround from, from everyone on this so that we will be ready to start field work in early May when the weather warms up.

14 Once we've completed that additional 15 investigation it'll wrap up the RI. We'll prepare an RI 16 report addendum to incorporate that new information. 17 We'll also do an addendum to the risk assessment to 18 incorporate that. As I mentioned in the tech session 19 yesterday the Air Force is going to collect and analyze 20 foam and it will be incorporated into the risk 21 assessment.

And so we'll use that comprehensive data set for the feasibility study which is the next, next step in the CERCLA process. We'll evaluate all of the data, all the sites, look at remedial actions, evaluate those



1 and then in the feasibility study recommend the 2 preferred alternative and then in the record of decision 3 we would memorialize what that remedy would be. MR. ARNIE LERICHE: Can I ask a quick question? 4 5 MR. STEVE WILLIS: Go ahead, Arnie. б MR. ARNIE LERICHE: For the, the data gap, I'd 7 like to ask for an AI. Request a milestone Gantt chart 8 for the data gap process starting with work plan, 9 development, draft, and so forth, state review and so 10 forth. And I was wondering if you could do that 11 basically in a similar format but maybe a little bit 12 more detail as you've been doing for us for the IRAs so 13 the public and the RAB knows exactly what's scheduling. 14 And it can always change of course, but at least know up 15 front in the next month, so --16 MR. STEVE WILLIS: Yeah, we can put something

17 | together for that.

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MR. ARNIE LERICHE: Thank you.

19 MR. STEVE WILLIS: And then next slide. So if, 20 if you refer back to the original UFP QAPP, there are 21 four PFAS sites identified for Wurtsmith. And based on 22 the data we've collected and the extent of the plumes, 23 these are going to be the revised boundaries to the four 24 PFAS sites. And you'll see particularly for the 25 southern two they've expanded significantly and these



will be in the RI report. As we get to the feasibility study, proposed plan and ROD, the potential exists that we may have remedies for each of the sites, we may have multiple remedies, but they may be done under a single proposed plan and ROD or there may be multiple proposed plans and RODs. That will all be based on evaluation of the RI results in the feasibility study.

8 So just be aware as we get to the latter phases 9 of the process, we could have more than one proposed 10 plan and one ROD for Wurtsmith. It may not be a 11 base-wide remedy. It may be broken up by the individual 12 sites. So just -- has no impact right now, but just for 13 long-term recognition that we, we could have one or 14 more. Go ahead, Arnie.

15 MR. ARNIE LERICHE: Steve, when that, these 16 four areas basically when sites, individual IRPs or PFAS 17 sites were aggregated together, that was dropped on the 18 RAB with no notice at all at a meeting and we never did 19 get any real description or process that the Air Force 20 used to make sense of that, what was the reason for it. 21 Because we've been asking for a site map, one that would 22 be used, updated and so forth so the RAB members would 23 have one in front of them so we'd always know when you 24 said something, a number or something you knew where to 25 qo.



1 And so we never really caught up because it was 2 never a crosswalk briefing for us. So too late to do 3 that now, but as you go forward with the sites that are 4 being investigated and we got the four IRAs on one, that 5 the Air Force try to give us notice, the RAB and the public, notice of when other sites could have been -б 7 would -- are being found or the status of priority 8 decisions that are used to base your decisions on a 9 particular site versus another one in the future. That. 10 that team, their prior team wasn't -- there was a time 11 when that wasn't happening. There was an interim 12 co-chair in there from the Air Force. 13 MR. STEVE WILLIS: Yes, it's been while ago. 14 MR. ARNIE LERICHE: Yeah.

15 MR. STEVE WILLIS: Yeah, several decs ago. 16 Yeah, we'll, we'll try and make a conscious effort to 17 keep you apprised as we change. And as we complete the 18 next phase of the investigation we make, may make 19 additional changes to these boundaries as we collect 20 more data. We may even potentially create a, a site on 21 the other side of Van Etten Lake based on what data we 22 find over there, so --

23 MR. ARNIE LERICHE: I hope so as you go outside24 of the boundaries off base.

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MR. STEVE WILLIS: There's a, there is a very



real possibility for additional changes to these
 boundaries, so --

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MS. JESSIE HOWARD: Mr. Henry?

MR. MARK HENRY: Can I add a little bit of input? At least a thought for your consideration? This operable unit -- that's a good enough explanation for it -- it's kind of large. And it actually covers -there's a groundwater divide that cuts through like this. In my opinion it might be a good idea to break this up into two sections: The stuff that's moving towards Van Etten Lake and the stuff that's moving towards the Au Sable River.

Because the treatments are going at their -the water is flowing in different directions and some of the treatments over here may be all combined together and certainly treatments that deal with this here will likely all be sort of working in concert. So breaking that up along the groundwater flow might make sense.

MR. STEVE WILLIS: Yeah, we'll definitely look at that. One possibility is shifting this boundary over. But, yeah, we'll, we'll consider that, Mark. Great point.

23 MR. ARNIE LERICHE: And also, Steve, another 24 quick one is I had asked for an AI to make the Clark's 25 Marsh a secondary source of PFAS because of its



absorbing and, and organic matter that's, that's in 1 2 there and it never made it. It got dropped out during one of the co-chair meetings, I believe. So I'd like to 3 4 ask to look into that because that would have triggered more sampling in the ponds, in the sediment of the 5 б ponds, and the streams for sediment because that's 7 probably where the animals, deer and, and other 8 terrestrials are gaining off the vegetation in that 9 area. So that really is a secondary source in the term 10 and definition in CERCLA.

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MR. STEVE WILLIS: Okay. Thank you.

MS. JESSIE HOWARD: We do have a question from somebody virtually, but I just want to give a quick reminder. This is a time for updates and we'll do questions at the end. But I will take the one that we have virtually right now. If you can unmute yourself and address the RAB, please?

MS. AMY RAUSER: Rob, I don't know last name. It just says "what about the lake?" So I'm not -- which -- Rob, do you want to define what specifically you were asking? Okay. Why don't we just move on?

MS. JESSIE HOWARD: Okay. Mr. Willis?

23 MR. STEVE WILLIS: Next slide, please. So 24 this, this slide provides an update on the, the two BCT 25 meetings that we've had since the last RAB meeting. The



1 May BCT meeting we had Allonnia do a presentation on 2 their Environmental Security Technology Certification 3 Program or ESTCP technology demonstration project. T've 4 mentioned this at previous RAB meetings. That 5 demonstration is scheduled for the fall of this year here at Wurtsmith. And that they're going to be б 7 demonstrating two, basically two technologies: A foam 8 fractionation system using super critical water 9 oxidation to concentrate the PFAS and foam, and then 10 using the -- I'm sorry. So the foam fractionation and the super critical water oxidation is a technology to 11 12 actually destroy the PFAS in that concentrate.

They're both going to be mobile units. We'll set them up the near the well control building that was put in for the Ken Ratliff Memorial Park IRA and that treatment pilot should run -- is it 60 or 90 days, Paula; do you recall?

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MS. PAULA BOND: 60.

MR. STEVE WILLIS: 60 days. And so as part of the tech session for the November RAB, I'll have these guys come in and do a presentation on their two technologies and it, there's a chance they may have some preliminary data on the, the work that they've done. And then after the presentation we'll go over for a tour of their equipment. So it gives a firsthand view and



explanation of how this stuff operates.

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And then for the July BCT meeting, excuse me, we have a -- for site SS057, we had a 2002 decision document for VOCs. So this predates the PFAS. It had VOCs as well as semi-volatile organics, organic compounds or SVOCs. But the, the record of decision called out aesthetic criteria as part of the performance cri-, criteria for the system instead of using a health-based cleanup criteria.

10 And so we're going back and reevaluating a 11 number of RODs here at Wurtsmith that may have used 12 aesthetic criteria instead of health-based. So 13 reevaluating those. This discussion at the BCT was on 14 SS057, but you can see on that last bullet there SS057, FT02, LF027, OT016, SS06, SS08, as well as SS021, all 15 16 relied on a, a aesthetic criteria instead of 17 health-based. So we are reevaluating each of those.

We'll schedule meetings with each of, each of the sites to go through the data with EGLE and provide some recommendations to change the criteria to a health-based evaluation. That's the basis for a CERCLA investigation and cleanup is a health-based system. More to come on that.

24 MS. CATHY WUSTERBARTH: Steve? I'd like to 25 interrupt. I'm sorry. Can you please explain what



1	aesthetic criteria is? I don't understand that.
2	MR. STEVE WILLIS: So it's, it's either a
3	visual or odor or something like that. It is not a
4	health risk, but it may smell bad. If you've got, you
5	know, your drinking water for instance, it has smells
6	like sulphur. It is an aesthetic-based criteria versus
7	a health-based.
8	MS. CATHY WUSTERBARTH: Thank you.
9	MR. STEVE WILLIS: Uh-huh.
10	MR. DAVID WINN: Steve, I have a question.
11	MR. STEVE WILLIS: Go ahead.
12	MR. DAVID WINN: These meeting minutes, are
13	those on the system, Air Force system so we can get
14	copies of it?
15	MR. STEVE WILLIS: So they are in the local
16	library and I will start posting those to the
17	administrative record.
18	MR. DAVID WINN: Okay.
19	MS. AMY HANDLEY: Dave, we do put those minutes
20	on the MPART web site as well.
21	MR. DAVID WINN: I understand that.
22	MS. AMY HANDLEY: So you can find them there as
23	well.
24	MR. DAVID WINN: They're the same meeting
25	minutes?



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 26
1	MS. AMY HANDLEY: Yep.
2	MR. DAVID WINN: Okay.
3	MR. ARNIE LERICHE: Mark, isn't OT16 one, a
4	plume that's just to the east of the FT02?
5	MR. STEVE WILLIS: Yes.
6	MR. ARNIE LERICHE: And you raised and I've
7	raised questions looking at the maps that it's a plume
8	there that's out there maybe about 400 yards to the
9	east, 600 yards maybe. And, but it, it never got the
10	attention of the Air Force to investigate that from what
11	I could see. And I was wondering if this analysis will
12	bring in or should bring in a further review and
13	sampling?
14	MR. MARK HENRY: Actually, the state did some
15	work in defining, tracking that plume down to the second
16	pond of excuse me, the third pond.
17	MR. ARNIE LERICHE: Yeah, but what year?
18	MR. MARK HENRY: That was in I'm thinking 2014.
19	MR. ARNIE LERICHE: Okay.
20	MR. MARK HENRY: And I was hoping that the RI
21	would fill in additional data related to that, but that
22	seems to be a data gap still.
23	MR. STEVE WILLIS: Are we talking about PFAS or
24	VOCs?
25	MR. MARK HENRY: We're talking about PFAS.



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 27
1	MR. ARNIE LERICHE: Yeah. They were
2	MR. STEVE WILLIS: The plume was investigated.
3	This, this evaluation is strictly based on VOCs, legacy
4	RODs
5	MR. MARK HENRY: Okay.
6	MR. STEVE WILLIS: from years ago.
7	MR. MARK HENRY: I understand that. But the
8	plume that I'm just pointing out that the plume that
9	Arnie is talking about, it had been brought up during
10	the development of the UFP QAPP because there was a high
11	concentration of VAS location out there either during, I
12	think it was during the SI or maybe the ESI. And there
13	were commitments made about defining that plume and that
14	was not done during the RI. And so I pointed that out
15	to EGLE and they said they would be discussing that with
16	you in the data gap investigation discussions.
17	MR. STEVE WILLIS: Okay. Great.
18	MR. ARNIE LERICHE: Does the, this exercise
19	you're going to do, does it involve the potential of
20	additional sampling or no?
21	MR. STEVE WILLIS: So all of these sites are
22	currently sampled. We've got sampling, monitoring
23	networks for the remedies for all of these sites. But
24	those monitoring criteria are based on aesthetic
25	criteria, not health-based.



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 28
1	MR. ARNIE LERICHE: So are you going to do, put
2	in additional sampling wells?
3	MR. STEVE WILLIS: Possibly. We'll have to
4	look at each site individually.
5	MR. ARNIE LERICHE: Okay. When you do that,
б	that I think should be in the discussion with EGLE and
7	Mark to, to see if it makes sense within state data and
8	where you're going to sample the VOC stuff to also
9	analyze for PFAS.
10	MR. STEVE WILLIS: Okay.
11	MR. MARK HENRY: Well, the PFAS is taking the
12	same pathway as that the VOC
13	MR. ARNIE LERICHE: Of course is does, right.
14	But I'm talking about the actual data.
15	MR. STEVE WILLIS: Yep.
16	MS. VICTORIA TARKLE (phonetic): Can somebody
17	from the audience ask a question or not? Or should I
18	hold my question? It just has to do with that screen.
19	Victoria Tarkle. I have a question. It says, "Uses
20	foam fractionation and super critical water oxida-,
21	oxidation technology." There was a comment made that it
22	would destroy the PFAS with regard to mold contain-,
23	containment unit.
24	When you say destroy the PFAS, could you define
25	what that means as it's an inorganic compound.



MR. STEVE WILLIS: So it breaks the fluorine 1 2 bonds and converts it to a benign solution. 3 MS. VICTORIA TARKLE: And when where you --4 obviously there's a plan once -- there must be a plan 5 once these containment units take these elements offsite. Do we have a -- and this might not be the time б 7 to ask, but with the units that we have going down 41 8 that are, are containment units, do we have a plan what 9 we're going to do with that reserve? I'm sure you do. 10 MR. STEVE WILLIS: So the material for this 11 pilot study in October, we're actually going to tap into 12 the extraction, the existing extraction wells for one of 13 the treatment system, bypass, run it through this 14 demonstration technology equipment and then once it's gone through that, they've pulled off the concentrated 15 16 PFAS solution, the rest of that water will go back into 17 the system and go through our existing treatment plant. 18 MS. VICTORIA TARKLE: Thank you. Thank you. 19 MR. STEVE WILLIS: Uh-huh. 20 MR. DAVE CARMONA: Okay. Another question

21 regarding that. What about the byproducts from the 22 breakdown from the destruction of the PFAS? You say 23 benign compounds and materials, how is that going to be 24 handled and moved?

MR. STEVE WILLIS: I don't know the answer to



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 30
1	that off the top of my head, but it'll be in that
2	presentation.
3	MR. DAVE CARMONA: Okay.
4	MR. BILL GAINES: Who would define benign? I
5	mean, how do you define benign? Some of the PFAS that
6	we're aware of people say that it's less harmful, but
7	is, is benign mean that it's no longer a fluorine carbon
8	compound?
9	MR. STEVE WILLIS: That's correct; yes.
10	MR. BILL GAINES: At all?
11	MR. STEVE WILLIS: Yes. That's correct.
12	MR. BILL GAINES: Okay.
13	MR. MARK HENRY: If I can add a little to that?
14	The super critical water oxidation is going to break it
15	down into carbon dioxide and fluoride.
16	MR. BILL GAINES: Oh. So
17	MR. MARK HENRY: It destroys it.
18	MR. BILL GAINES: takes it back to what it
19	was in the beginning? Thank you.
20	MR. DAVE CARMONA: Fluoride by no means is
21	benign.
22	MR. BILL GAINES: Well
23	MR. MARK HENRY: In very low concentration.
24	It's like what they add to municipal water supplies.
25	MR. DAVE CARMONA: Okay.



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 31
1	MR. MARK HENRY: It's in our teeth.
2	MR. DAVE CARMONA: Yeah, okay.
3	MR. STEVE WILLIS: Next slide is Amy.
4	MS. JESSIE HOWARD: Okay. Next we also have a
5	prepared update from Amy Handley with EGLE.
6	MS. AMY HANDLEY: Yes. Good evening,
7	everybody. We can go to the next slide. I just have a
8	couple of our recent activities here. So as Steve
9	mentioned, he gave us the update from those BCT
10	meetings. We were also present for those as well. And
11	those minutes will be available on the MPART web site.
12	The May minutes are already on there and the July
13	meeting minutes will follow in the next couple of weeks.
14	We were also present during that committee
15	meeting with the Homeland Security & Government Affairs
16	staff. Me personally, I found it to be a very useful
17	conversation with those individuals. So I thought it
18	was a really great effort for them to come up here and
19	see the site and appreciate everybody's effort that was
20	also there, community members and, and staffers. So I
21	think we'll see some, hopefully some good outcomes from
22	that if there, if there are any.
23	We received that third quarter vapor pin and
24	indoor air data from the Air Force related to the VI
25	work. We've seen pretty consistent data with that



which, which is good. We also reviewed the draft IROD 1 2 and provided comments to the Air Force and then had a 3 bunch of discussions with our staff within Water Resources Division and our AG's Office for the ARARs 4 5 which I'm sure most of you are now aware that the ROD б has been finalized and signed by the Air Force which we, 7 we feel is the right decision to keep that project 8 moving forward, but we do have some things we have to 9 work on still with figuring out how we come to 10 resolution on some ARARs for the future IRAs that are 11 So we still have some work to do there. coming.

12 We also provide or reviewed and provided 13 comments for the draft work plan related to the Alert 14 Aircraft Area IRA, and we're still waiting to hear back 15 from the Air Force on responses for those. And we've 16 been doing a lot of internal discussions with our 17 technical staff for the RI data in preparation for 18 building that scope with the Air Force for the data gap 19 investigation.

20 Next slide, please. Okay. We have that 21 meeting that Steve has already mentioned tomorrow 22 afternoon to talk through our review for the RI work and 23 what's going to be included within that data gap 24 investigation scope. And we've also been continuing to 25 work with our fellow staffers at MDHHS to review that VI



1 immediate work plan data. We've been working with the 2 local health department and our, our RD district office 3 staff and some folks from DHHS to figure out the best 4 solution for homes that were previously hooked up to 5 municipal systems, but still have wells in place that 6 were not closed during their hookups.

7 So there's been some talks about what the best 8 options are going to be so we're still trying to figure 9 out what, what the best solutions are for that. We are 10 currently in the process of bringing on a new contractor 11 to assist with our vapor intrusion reviews and all the 12 work related to that. I think that's going to be hugely 13 helpful for us having a specialist on board that really 14 understands the full in-depth workings for, for vapor 15 intrusion. So they should hopefully be on board by the 16 time we have our next RAB meeting.

17 And then we just have a large list of 18 additional documents that are listed up there that are 19 coming in between now and the end of the year that we plan to be reviewing and providing comments for and put 20 21 So those are some of our upcoming activities that on. 22 we have between now and the end of the year. And that's 23 it. Thank you.

> MR. DAVID WINN: I, I have a question. MS. AMY HANDLEY: Yes, Dave.



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MR. DAVID WINN: I'd like to add as an action 1 2 item. Amy, yesterday Mark Henry asked for EGLE's 3 response on allowing contaminated water above GSI 4 criteria for 12 parts per trillion before the remedy is 5 completed. And you, you said you would provide a I'd like an action item added for that б response. 7 please.

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MS. AMY HANDLEY: Thanks, Dave.

9 MS. JESSIE HOWARD: Okay. Thank you, Amy. Just real quick reminder before I get to the rest of the RAB member updates. If we could please stick to updates 12 only at this time? We'll have a couple of chances later 13 for question and answer.

I will begin with the government RAB members. Tim Cummings, was there an update from Oscoda Township?

16 MR. TIM CUMMINGS: Yes. So the Air Force met 17 with the, the Oscoda Township yesterday morning. There 18 were several discussion points. Started construction on 19 the new IRA project which was discussed a moment ago I 20 think by Mr. Willis. Discussion of filtration system or 21 PFAS in the lagoon, plan on eliminating sources coming 22 in from base groundwater to storm water system, a clean 23 out of line from hangar 7 and returned to use once 24 that's cleaned. Three Pipes moving forward in the time 25 presented in January, small treatment resin filter to be



1 built and it's in the budget for 2025.

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Finally, slip lining the pipe may be more cost effective to stop contaminated groundwater from getting into the storm sewer and Three Pipes. Those were the topics. Thank you.

MS. JESSIE HOWARD: Thank you. Michael Munson, was there an update from OWAA?

8 MR. MICHAEL MUNSON: Yes. My name is Michael 9 Munson. I'm with Oscoda Wurtsmith Airport Authority. 10 This summer has been a busy, busy month at the airport. 11 I'm sure you've seen in the paper Operation Northern 12 Strike which the airport was involved in with the Armed 13 Forces. They mentioned several things that they did. 14 Based their hot fueling of airplanes, they had an 15 operational field control tower. That was unusual for 16 us GA pilots had to talk to a control tower in Oscoda.

17 And the Special Forces did some exercises here, 18 I can't state too much more about that. too. The 19 Sports Car Club of America is, is using what we are now 20 calling Iosco apron to do vehicle testing. They'll be 21 here basically three times this summer. This last one 22 was the third one. They've got one more I think in 23 October.

24 We are pursuing refurbishing fundings for a 25 previously closed taxiway at the center of the airport.


We are working with the township to secure grants for
 utility installations on the 40 acres of business
 related property that's in the southwest corner of the
 airport.

5 I got two more items here. Several years ago б Michigan Aerospace Manufacturing Association referred to 7 as MAMA, approached the township and the airport and the 8 community about satellite work. That didn't really take 9 off really well. They have regrouped. They are now called Space Harbor and they're back again looking at 10 11 renting a facility to do some, some minor work. And 12 last but not least, we're in the initial development of 13 a new pilot term of a building. After the meeting if 14 you want to ask me any more questions about what's going 15 on here, well, I'd be more than happy to provide. Thank 16 you.

MS. JESSIE HOWARD: Thank you. Denise Bryan,
District Health Department. Did you have an update for
us?

20 MS. DENISE BRYAN: I do not have any updates 21 from local public health.

22 MS. JESSIE HOWARD: Thank you. And Chelsea 23 Gary from Michigan Department of Public Health?

24 MS. CHELSEA GARY: Yeah. I do have a few 25 updates. I wanted to give an update on the 2024 round



five residential well sampling. That has completed with 1 2 180 homes that were sampled and results letters have 3 been sent for that. There were 125 non-detects, 49 4 detections, and six exceedances of our criteria for 5 PFAS. Additionally, we were not able to get in contact with the Iosco Sportsmens Club for water sampling, but б 7 we did update the Air Force on that. For OAEA, clinics 8 are continuing and scheduling and as of 8-12-2024, 828 participants have enrolled with 699 adults and six 9 adolescents that have completed appointments. 10

I also wanted to include a reminder about the 11 12 behavioral adaptability learning about novel 13 contamination in the environment also known as the 14 Balance Project. If you have questions about this 15 project, let us know and we can connect you with a study 16 team member. And lastly, an update on the vapor 17 intrusion investigation. MDHHS has received the guarter 18 three sub-slab and indoor air quality data as was 19 indicated and we are working on our analysis and final 20 evaluation of the data. Closure of buildings 43 and 21 5067 do not appear to be necessary based on initial review of that data so far, however, a plume is 22 23 identified under the buildings and the indoor air data 24 is limited so we do encourage steps to be taken to 25 prevent VI into the buildings and reduce exposure.



1 Lastly, we do encourage anyone with questions 2 about their individual exposure to reach out. And that 3 is all I have. Thank you, Chelsea. 4 MS. JESSIE HOWARD: And 5 now for our community RAB members. Mr. Henry, did you б have an update for us? 7 Yes. The Community RAB has MR. MARK HENRY: 8 had a couple of internal meetings discussing what's 9 going on and discussing the upcoming activities. And in 10 addition to that, I participated along with Mr. Bob 11 Delany in meeting with Senator Peters' staff who came up 12 here in May to have a tour of the base and see the 13 treatment facilities. 14 MS. JESSIE HOWARD: Thank you. Dave Carmona, 15 do you have an update for us? 16 MR. DAVE CARMONA: Yes. So I keep hearing the 17 term "core water" being used without clear explanation 18 so I decided to educate myself about core water sampling 19 and why it may be so important as how the data is 20 qathered here. 21 Core water sampling uses a syringe or a 22 peristaltic pump to gather near surface water to be 23 This is similar to groundwater testing done tested. 24 through monitoring wells on a smaller scale. Water is 25 taken from the surrounding area to create a sample for



1 testing. This is also the same principal the Air Force 2 uses in pump and treat operations. You create negative 3 hydraulic pressure near the well casing and expect the 4 water to move towards the pump.

Same scientific principals being applied for the groundwater sampling and for pump and treat. The large scale operation to gather groundwater for sampling is identical in principal, the principal used for core water sampling. With that in mind, I ask why would you not use proven methodology to gather data and information as you do with the larger scale at the gathering?

13 In my opinion this shows a lack of scientific 14 rigor. Sediment sampling is similar to soil testing except it is designed to gather only surface sediment 15 16 near the lakeshore for the purposes of volume uptake, up 17 to six inches of depth as we were informed during the 18 RAB technical meeting yesterday. Water on the lakeshore is not static nor is the contamination it carries. 19 As 20 the lake level varies with draw downs, wind conditions, 21 large runoff events and rain, more or less of the 22 shoreline is exposed or covered. The result is that 23 there is even more or less contamination being present 24 at the time of the single point of sampling.

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A snapshot of a moment in time not data set of



information over time. Yet the Air Force uses the very 1 2 limited sample set to make risk assessments. When not 3 covered with water the sediment moves down into the 4 soil. It does not remain near the surface. Gravity 5 never stops, hydraulic pressures changes, and water follows the line of least resistance. It does not 6 7 reside at the surface or in the back shallow sediment 8 very long.

9 The persistent resistance to the request of our 10 RAB science experts only demonstrates to me that the Air 11 Force created the scope of the RI with an end state in 12 mind, rather than allowing the science-based evidence to 13 lead you to an accurate and complete study of the 14 surrounding former base.

15 Another demonstration of this lack of rigor is 16 in the lack of wider variety of flora being included in 17 the biome study. Have you even considered or paid 18 attention to the large expansion of cocktail -- cattails 19 along the Van Etten Lake shore? How about bottom-based 20 plants which right now extend to the surface where the 21 microlayer resides? How about trees surrounding the 22 lake? There are literally tons of plants taking up 23 contaminated water at this very moment, then releasing 24 this contamination back into the lake when they die or 25 shed their leaves at the end of their growing season.



I challenge the shortsightedness and lack of 1 2 scientific rigor the DOD used to create the RI for the former base. The RI should be a living document which 3 allows for scientific data to lead the DOD to a 4 5 thoroughly -- to a thorough study, the extent of the contamination based on the evidence as stated in their б 7 scoping document. Poorly designed studies lead to poor 8 results and that's what we are experiencing here in 9 Oscoda.

10 The DOD's nonchalant attitude for its valid, 11 scientific-based suggestions from the Community RAB is 12 running up against two resources. We do not have an 13 abundance of time and money. As you move swiftly with 14 the feasibility study with the vaque promises for an associated data gap study, I can't help but wonder 15 16 whether time and money will lead to the data gap study 17 not being important enough to complete resulting in an 18 incomplete data set and incomplete resolution for 19 contamination in this area. We need to apply the same 20 rigor to review where this overall process stands as we 21 did with the four new IRAs recommended by the CPA 22 process.

The recommendations of the committee to RAB sign experts need to be thoroughly considered by a third party, not those directly contracted by the DOD or the



far removed opinions of the DOD general counsel. 1 The 2 DOD has its goals getting a final solution in place and moving on from this debacle. But we, the community, 3 4 have only one goal: Removing contamination from our 5 living space. I challenge the DOD to do the right thing, implement the suggestions of the Community RAB б 7 which are not unreasonable and based on proven 8 scientific principals, amend contract to allow for the flexibility to go where the data leads. This is done 9 10 all the time with military hardware contracts, why not 11 here?

Allocate the funding to gather the data needed to make an accurate determination of the full extent of the contamination especially where your own data suggests that something unusual is happening where contamination interfaces with the Van Etten Lake environs and the isolated hotspots which are not connected to anything.

Please do the right thing for the people who
live and visit in this area. In light of the recent DOD
decision in Tucson not to clean up their water supply
due to recent SCOTUS decision to overturn the Chevron
Deference decision, I would hope that the Air Force will
not apply this capricious decision to Wurtsmith. The
decision made by the court requires the, the, those



1 disagreeing with the interpretation of the law, in this 2 case CERCLA, to file with the court system and have the 3 disagreement adjudicated. Nowhere in the court's 4 decision did I see or read that the grieved party, in 5 this case, the DOD, has the right to cease complying б with the current interpretation as supported by 7 congressional mandate and law. Rather, it opened a 8 legal avenue to have the two -- the courts two-tiered 9 process regarding Chevron apply to the law in question.

10 SCOTUS was specific about congressional laws 11 already established. That compliance with the 12 congressionally passed laws were to remain in force 13 until the courts issued an injunction or made a ruling 14 regarding a specific portion of the law in question. While I do not know all the details of the DOD decision 15 16 in Tucson, I do know that the DOD agreed to use 17 state-established contamination standards here in 18 Michigan.

19 This decision was made well before the recently 20 approved EPA standard went into effect. I hope that the 21 DOD will continue to honor their agreement here at 22 Wurtsmith by continuing to use the Michigan standard 23 agreed to prior to the EPA, EPA issuance of similar 24 standard and the SCOTUS reversal of Chevron Deference. 25 Please do the right thing for our environment and more



importantly for our people so that future generations
 can enjoy the wondrous resources we have here in Oscoda.
 Thank you for your time.

MS. JESSIE HOWARD: Thank you, Dave. Bill
Gaines, did we have an update?

б MR. BILL GAINES: We talked again tonight about 7 the work season starting in May and I've heard as long 8 as I've been on the RAB that Van Etten Lake changes from 9 winter to summer. I question whether having a, a work season for sampling that doesn't equate to changes that 10 11 happen in our environment locally is a comprehensive 12 investigation of the data. I don't understand how you 13 can know what's happening under the water if -- or on 14 the boundaries of Van Etten Lake if you're not 15 investigating it at a time when those boundaries are 16 available for investigation or more readily available 17 for investigation.

So I'd like to understand why our work season is limited to May to October when the environmental effects happen year round. Thank you.

MS. JESSIE HOWARD: Thank you. Again, if we could just please stick to updates at this time and keep them to three minutes or less so we can get moving through this? We will have time for questions and answers later tonight.



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 45
1	Let's see. Kyle Jones, did you have an update
2	for us?
3	MR. KYLE JONES: No update.
4	MS. JESSIE HOWARD: Thank you. Arnie Leriche?
5	MR. ARNIE LERICHE: No update.
6	MS. JESSIE HOWARD: Scott Lingo?
7	MR. SCOTT LINGO: No updates.
8	MS. JESSIE HOWARD: Greg Schulz?
9	MR. GREG SCHULZ: No updates.
10	MS. JESSIE HOWARD: Okay. Rex Vaughn?
11	MR. REX VAUGHN: No update.
12	MS. JESSIE HOWARD: Thank you. David Winn?
13	MR. DAVID WINN: The only update I'd like to
14	add would be presentation was given by Dave Carmona
15	yesterday relative to the foam on Van Etten Lake. I'd
16	like that added to the action item list and I'd like a
17	response from the Air Force as to if they plan on using
18	this, any of this information for future studies of the
19	foam in, on Van Etten Lake. Thank you.
20	MS. JESSIE HOWARD: And Cathy Wusterbarth, did
21	you have an update for us?
22	MS. CATHY WUSTERBARTH: I do, yes. Thank you.
23	We have been meeting with community members and with
24	legislators. We have had dozens of meetings in the last
25	three months, since the last RAB meeting, and they've



been very productive. Reviewing all the information
 that is supplied by the Air Force and just utilizing all
 the information that we have.

4 We also are involved in a new group that was 5 formed by the environmental working group called the Defense Community PFAS Network. And that, that is an б 7 advocacy group that can help get those funds needed for 8 places like Oscoda in terms of congressional actions. 9 So we are working with them so that we can get money 10 sent our way also. We've also given tours. We're 11 contacted by the media all of the time to tour the base 12 and we do that the best that we can without labeled 13 buildings. And I believe Arnie actually gave a tour to 14 Dr. Courtney Carignan recently who has been someone who 15 follows our site very closely and has been very helpful 16 for our advocacy group.

And we also in the last three months attended the National PFAS conference which was in Ann Arbor. It was an amazing conference with a lot of information. And I want to extend my appreciation, appreciation to MDHHS for attending. That was really great to see them there and being interested in that.

The last two items I'd like to point out that we got a press release issued, you know, I guess to the press about the Alert Aircraft Area recently and it was



not supplied to the RAB. So it was directly related to 1 2 the work that we do, but we -- it was not provided to 3 the RAB members and I request that in the future if 4 there's any press releases that are related to 5 Wurtsmith, that they get -- that RAB get included б immediately.

7 And lastly, I'd like to point out that there 8 will be some slides in the future, in the meeting here 9 that will show the boundaries. And I think Steve just 10 showed one of them. But it shows the plumes and the 11 boundaries of the, the former base. And those plumes 12 are off of the property of the base and that is illegal, illegally flowing off of the base. Our group is 13 14 dedicated to ensuring that the priority is stopping the 15 flow or stopping the bleeding of PFAS off of the base. 16 This is our priority and this is why we are asking for 17 these IRAs to be done in a timely manner so that we can 18 stop the bleeding. Thank you.

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(RAB Business Update at 5:59 p.m.)

20 MS. JESSIE HOWARD: Okay. Next we will have 21 the RAB business update from Mr. Willis.

22 MR. STEVE WILLIS: Next slide. So action 23 I, I did distribute the updates action on the items. 24 list from our last action item meeting and sent that out to the RAB members I think on Sunday evening. We had



1	our last RAB action item meeting discussion on the 12th
2	of June and I'm proposing that the next meeting would be
3	on the 18th of September. It would be 6:00 o'clock
4	eastern time. It'll be a virtual meeting and I'll send
5	out the Teams invite for that.
б	Since our last RAB meeting we opened five new
7	action items, we closed seven, and we have 35 that are
8	still ongoing or 37, I'm sorry, that are still
9	ongoing. Next slide. Paula?
10	MS. JESSIE HOWARD: Okay. Just a quick
11	reminder before we begin tonight's presentation to
12	please hold your questions either until Paula breaks for
13	questions or the end of the presentation. We will have
14	time to address all of those. And here's Paula Bond
15	with Aerostar with the PFAS RI and the Alert Aircraft
16	Area IRA update.
17	(PFAS RI and IRA Update at 6:00 p.m.)
18	PAULA BOND
19	MS. PAULA BOND: Thanks, everybody, for joining
20	us this evening. I want to kind of just kind of catch
21	everybody up. At the last RAB back in May we had just
22	completed some additional groundwater sampling from
23	existing wells. Since that time we have had that data
24	analyzed with the laboratory, we validated the data,
25	pushed the data out to everybody on the team for



incorporation of the risk assessment and to the
 conceptual site model into the RI report.

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So that's what we've kind of been doing since the last RAB. We haven't collected any new additional field data. So we have been working that data and we've also been incorporating, like I said, everything into the RI report. We've been working on that for the last several months getting that ready to go to the Air Force.

10 And the RI report is going to include all of 11 the data that we've collected today. And I do want to 12 mention, too, all of the data that we've collected is on 13 the posters out here in the lobby that you guys have 14 been looking at for the last three years. As we collect 15 new data, we add to those posters. So what is out there 16 now is the latest. Has all the available data that we 17 have on the posters.

18 So -- and as we continue to evaluate that data 19 and look at it in different ways, whether we're doing some, you know, 3D data visualization, we'll be 20 21 providing some more ways to look at the data, but all 22 the data is there and it has been collected. And like 23 Steve said, all of our analytical data has been provided 24 to the RAB in Excel form so you guys have all the data 25 in a different form that you can use as well.



1 So back to the RI report that we've been 2 working on. It will include a description of everything 3 that we've done over the last three years: All the 4 fieldwork, all the data that we've collected. It will 5 have an update to the conceptual site model. The original UFP QAPP had a draft conceptual site model. б 7 All the data we've collected will be fed into the new 8 one. That will be a standalone document and appendix to 9 the, the RI report, but that will be in there.

10 It will include both the human health and 11 ecological risk assessments that we've been talking 12 about. All of that information, interpretation will be 13 in the RI report. We've been doing groundwater fate and 14 transport modeling, numerical modeling, so that we can 15 predict the fate of the groundwater plumes. So that 16 will be included. We've been talking a little bit about 17 data gaps. That will also be in the RI report, any data 18 gaps that we've identified as we evaluate that data will 19 be in there along with conclusions and recommendations 20 for future actions.

21 So what I've kind of prepared tonight because 22 we have been presenting the data for the RI as we've 23 kind of gone along so I don't really have any new data 24 to report. So what I thought I would do is maybe just 25 give everybody a summary of the data that we have



collected, maybe the locations where we found the
 highest concentrations of, of things, so we'll kind of
 move into that. Next slide, please.

So we'll start off with groundwater. And for the PFOS plume, it roughly equates to about 4.3 square miles of plume that exceeds 4 nanograms per liter. It does extend from the surface of the groundwater at release areas down to the confining clay layer as we move away from those release areas. But the entire saturated thickness from the surface down to the clay, we do find concentrations of PFOS above 4 nanograms per liter.

The highest concentration we have found in shallow groundwater which is 121,000 nanograms per liter, and that is at the maintenance hangar. And you guys can see where that -- hopefully you can see where that fell there. But that is kind of right in the center of the site there.

19 Next slide, please. The PFOA plume is about 20 4.2 square miles. Again, kind of a similar story. It 21 does extend from the surface water table in those 22 release areas down to the confining clay layer at 23 concentrations above 6 nanograms per liter. The highest 24 concentration of PFOA that we found in groundwater is at 25 FT02, which is kind of in the southwest portion of the



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1 former installation.

2 Next slide. The PFHxS plume is a little bit 3 smaller. It's about 2.9 square miles and our screening 4 criteria is 39 nanograms per liter that we have. And that also extends down to the confining clay layer at 5 б concentrations above our, our screening criteria. The 7 highest concentration that we have found on the base in 8 groundwater is in shallow groundwater at FT02.

9 Next slide, please. PFNA as you can kind of 10 see from the map is a smaller plume. That one is just 11 about .8 square miles. Our screening criteria is 6 12 nanograms per liter. Again, similar story. The highest 13 concentrations in shallow -- that we found in shallow 14 groundwater is 287 nanograms per liter at the KC-135 15 crash site. So that's on the north side of the runway. 16 Next slide. So let's move on to soil. 17 MR. ARNIE LERICHE: Paula? 18 MS. PAULA BOND: Oh. Yes, Arnie. 19 MR. ARNIE LERICHE: Does the star on the map 20 indicate the location of the highest? 21 MS. PAULA BOND: Uh-huh; yeah. MR. ARNIE LERICHE: 22 Okay. 23 MS. PAULA BOND: And one thing that you'll 24 notice on all of those groundwater slides is that the 25 highest concentration we have found is in the shallow



which makes sense because that's where the release areas 1 2 are so we're going to have the higher concentrations in 3 the release areas in the shallow groundwater.

4 For soil, PFOS was detected above 13 micrograms per kilogram at a lot of locations: At the DRMO, integrated maintenance, the base operations area or the 7 BOA as we call it, site SS71 which is just to the east 8 of the BOA, the maintenance hangar, building 5091 and 5092, the KC-135 crash site and the location where the 9 KC-135 crash site fuselage was stored temporarily after they cleaned up that crash, and the wastewater treatment 12 plant, drying beds and seepage beds, and FT02.

13 The highest concentration of PFOS that we 14 identified in soil was 1700 micrograms per kilogram and 15 that was found at FT02.

16 Next slide, please. PFOA was not detected 17 above our screening criteria in soil which is 19 18 micrograms per kilogram. The highest concentration that 19 we did detect was only 13.2 and that was at the BOA. 20 PFHxS, again, was not detected above our screening 21 criteria of 130. We did find the highest concentration 22 at site SS71. PFNA, again, we did not find it above our 23 screening criteria, but we did find the highest of 15.8 24 and that was at the KC-135 temporary fuselage storage 25 area.



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Next slide. So we'll move on to surface water. PFOS was detected above 12 nanograms per liter in surface water at Van Etten Lake, integrated maintenance at the AFFF retention pond, along the Au Sable River, ponds 1, 2 and 3 in Clark's Marsh, Three Pipes Ditch, and in Clark's Marsh south of the wastewater treatment plant.

The highest concentration that we found was 3400 nanograms per liter and that was in the AFFF retention pond and integrative maintenance. We did not find PFOS above our screening criteria in Duell Lake, Allen Lake or Van Etten Creek.

Next slide, please. PFOA, our screening
criteria was 170. We found that above the screening
criteria of course at integrated maintenance, AFFF
retention pond, -- try to say that fast three times -and Clark's Marsh south of the wastewater treatment
plant. The highest concentration of PFOA that we
detected was in the AFFF retention pond.

20 PFHxS we found above our screening criteria in 21 pond 1 in Clark's Marsh, integrated maintenance AFFF 22 retention pond, and the Clark's Marsh south of the 23 wastewater treatment plant. So a lot of these are kind 24 of a recurring theme where we found our highest 25 concentrations. The highest PHFxS was 621 nanograms per



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liter also found in the integrated maintenance AFFF
 retention pond.

PFNA detected above 30 nanograms per liter at the integrated maintenance AFFF retention pond, Clark's Marsh south of the wastewater treatment plant, and the highest was in Clark's Marsh south of the wastewater treatment plant.

8 Next slide, please. Sediment. PFOS was 9 detected above our screening criteria of 15 micrograms 10 per kilogram in ponds 1 and 2 in Clark's Marsh, Van 11 Etten Lake, the integrated maintenance AFFF retention 12 The highest concentration of 496 was found in pond. 13 pond 1 within Clark's Marsh. PFOA was not detected 14 above our screening criteria, 23 micrograms -- oops -per kilogram. And neither was PFHxS or PFNA identified 15 16 in the set above our screening criteria. Next slide, 17 please.

18 So that's kind of the summary of the data that 19 we've collected. The ongoing activities that we have 20 out there, the only thing we have left is monitoring of 21 the transducers that we have positioned around the 22 southern end of Van Etten Lake and Van Etten Creek. 23 Those transducers will stay in until after the lake 24 level changes in early November. So we'll collect that data and then incorporate all of that into the final RI. 25



1 Everything else is being collected. The draft RI report 2 is going to the Air Force next week so that they can 3 start their review.

Next slide, please. Just a little information on the Alert Aircraft Area interim remedial action. Τf you guys have been driving by up there, you've probably seen some heavy equipment moving dirt. We got guite a few dirt piles out there. We got already several of the infiltration galleries installed so there's a lot of work going out there, going on out there.

Here's just some photos of some of the 12 activities that have taken place. So really 13 construction has begun on that. We're under way and things are moving rapidly out there so you'll see a lot of quick progress on that building, that treatment system going over the next couple of months. Dave?

17 MR. DAVE CARMONA: The bottom right image, 18 that's an infiltration gallery?

19 MS. PAULA BOND: No. That is the pipes coming in for the header that, that are coming from the 20 21 extraction wells that are coming in.

MR. DAVE CARMONA: Okay. Thank you.

23 MS. PAULA BOND: That's all now or will be 24 under the con-, under the concrete slab. Next slide. Ι 25 think that's -- yeah. So we've already talked a little



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1	bit about this tonight. The final interim ROD was
2	signed on July the 26th. And the ROD does include the
3	responsiveness summary which responds to the comments
4	that were made by the public on the proposed plan and
5	that is available on the admin record electronically,
6	and that's also in the library if anyone wants to go
7	look at it there.
8	And I think that is it on those two things
9	before we get to the schedule. Steve, do you want to
10	oh. You want to do that first and then questions or
11	MR. STEVE WILLIS: No. Let's go ahead and do
12	questions for Paula and then we'll jump into the
13	schedule.
14	MS. PAULA BOND: Okay. Okay. Go ahead, Mark.
15	MR. MARK HENRY: I've been looking at the data.
16	This is my passion.
17	MS. PAULA BOND: Yes.
18	MR. MARK HENRY: And what I've seen around the
19	base is that the, the concentrations of the PFOS and
20	PFOA there's a ratio. You can set up a ratio between
21	the two. And then in most cases the PFOS concentration
22	is vastly larger than the PFOA.
23	MS. PAULA BOND: Uh-huh.
24	MR. MARK HENRY: I would recommend that you
25	produce a map of those ratios and that would dovetail



1	into the work that Steve has planned in the future of
2	looking for non-AFFF sources. Even around Clark's Marsh
3	there's a disparity. Landfill 27 has a much higher
4	or lower ratio of PFOS and PFOA than the fire training
5	area right next to it.
6	MS. PAULA BOND: Uh-huh.
7	MR. MARK HENRY: So there's a lot of those that
8	I have noticed around and I think they really need
9	paying attention to.
10	MS. PAULA BOND: Yeah. That, that is a great
11	comment. And we have done quite a bit of work
12	evaluating the ratios and looking at some other
13	characteristics of each of the plumes from all of the
14	groundwater data that we have. And that is one thing,
15	like, with the 3D data that we're looking at, different
16	ways to visualize this data and maybe for the next RAB
17	we can have some of those other data visualization
18	tools. But that is one thing that we have done is
19	looked at ratios.
20	So we do have some, some things that we're
21	working at with different ways to look at this data.
22	So, yeah, we have done that.

MR. MARK HENRY: Thank you.

MS. PAULA BOND: Yes, Arnie?

MR. ARNIE LERICHE: On the, the soil numbers



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1	and, and the map, I thought when we were discussing it
2	yesterday at the tech session this is Arnie Leriche,
3	by the way, of the RAB that we did, I did, finally
4	did locate the area where in the Three Pipes ditch there
5	was an insert that was put way off on the corner of the
6	map and that's how I missed it.
7	MS. PAULA BOND: Okay.
8	MR. ARNIE LERICHE: But it showed a number of
9	2,000.
10	MS. PAULA BOND: For surface water or sediment?
11	MR. ARNIE LERICHE: No. Sediment. Well, no,
12	not sediment, soil. Wasn't it a soil sample?
13	MS. PAULA BOND: Unh-unh.
14	MR. ARNIE LERICHE: Wasn't?
15	MS. PAULA BOND: Unh-unh; no. If it was Three
16	Pipes Ditch, it was either surface water or sediment.
17	We didn't collect any soil near Three Pipes Ditch.
18	MR. ARNIE LERICHE: But there are people
19	walking within maybe 30 feet of that. That path goes
20	right past it and walking dogs and stuff. I mean, it's,
21	it's dry a lot of the time so hunters go, definitely go
22	in there.
23	MS. PAULA BOND: Uh-huh.
24	MR. ARNIE LERICHE: Would you be check for
25	surface?



1 MS. PAULA BOND: So are you talking about 2 within the ditch itself or are you talking about --3 MR. ARNIE LERICHE: Well, there's the drop off to the east side of the, the ditch and then there's the 4 5 forest or Clark's Marsh this flows into partly and most б of it I quess continues on down to the Au Sable River 7 and the actual Three Pipes that people see. 8 MS. PAULA BOND: Yeah. We, we collected 9 sediment in several locations along Three Pipes Ditch, 10 but we haven't collected any soil on either side of 11 Three -- if that's what you're asking about? 12 MR. ARNIE LERICHE: The surface. Surface soil. 13 MR. STEVE WILLIS: The, the soil, the soil 14 sampling has been focused on release areas where PFAS would have been released on the soil and then has 15 16 migrated down into the ground. 17 MR. ARNIE LERICHE: That's what the storm water 18 did with 1,000 parts per trillion PFAS. 19 MR. STEVE WILLIS: There, there is --20 MR. ARNIE LERICHE: Could have been higher in 21 previous years. 22 MR. STEVE WILLIS: But there's no PFAS release 23 It's all confined -onto the soil in that area. 24 MR. ARNIE LERICHE: There's no PFAS that what? MR. STEVE WILLIS: 25 That's released onto the



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 61
1	soil. It's confined to the surface water and sediment
2	in the ditch.
3	MR. ARNIE LERICHE: It's not wet all the time.
4	MR. STEVE WILLIS: I'm not following your
5	MR. ARNIE LERICHE: Mark, am I missing
б	something here? I think an issue that is
7	MR. MARK HENRY: It might be a definition.
8	Within the ditch itself there during the base flow, you
9	know, it kind of meanders through there and there's soil
10	that is considered sediment if the water is higher, it
11	gets inundated.
12	But outside of the ditch, unless the unless
13	there was a known release there or unless the ditch
14	overflowed onto that area with high concentrations, I
15	don't, like Steve, I don't understand how the PFAS would
16	have gotten there.
17	MR. ARNIE LERICHE: Well, just refer to what
18	happened last fall or whenever that storm was that
19	washed away your pilot project. That flow that was
20	going through there was probably around 15 plus feet
21	wide.
22	MR. MARK HENRY: But it was very, very dilute.
23	MR. ARNIE LERICHE: It was very what?
24	MR. MARK HENRY: Dilute. The base flow being,
25	let's say, 50 gallons a minute was diluted by 1,000 fold



during the storm event when all that water came through 1 2 there in the ditch. 3 MR. ARNIE LERICHE: It wasn't sampled during 4 that time, vou're right. You're right. But when it was 5 sampled on outflow, it said it was 1,000 or more. б MR. MARK HENRY: Under base flow conditions, 7 yes. 8 MR. ARNIE LERICHE: Right; right. So that 9 soil, those leaves and that soil for an inch or so is 10 It's possible animals definitely would go through dry. 11 there. I know dogs do that are on the loose. I've seen 12 them. And I looked down there real close one time about four years ago and I was able to walk right there and 13 14 see that, yeah, there was flow. The leaves were kind of 15 piled up on the edges where the water had risen at some 16 point. 17 MR. MARK HENRY: Well, down in the bottom of 18 that ditch during the base flow --19 MR. ARNIE LERICHE: Well, it's not a ditch that 20 was dug, was it? 21 MR. MARK HENRY: Yes, in 1967. 22 MR. ARNIE LERICHE: It was covered with leaves 23 and (inaudible). You don't see --24 MR. MARK HENRY: They brought bulldozers down 25 there and took what was a seepage base going out into



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 63
1	Tucker's Swamp and turned it into Three Pipes Ditch.
2	MR. ARNIE LERICHE: Okay. I'll have to go down
3	again. Okay.
4	MS. PAULA BOND: All right. Yes, Dave?
5	MR. DAVID WINN: Dave Winn, the RAB. Paula in
6	your you state your slide, that should say IR
7	report includes human health and ecological risk
8	assessment.
9	Explain to me that ecological risk
10	assessment as we talked yesterday, there was additional
11	data that needs to be collected as part of that risk
12	assessment. Am I right in saying that? Steve?
13	MS. PAULA BOND: So oh, go ahead, Steve.
14	MR. STEVE WILLIS: So, yes, we will collect
15	additional data and we will incorporate that in the risk
16	assessment in, in the form of an addendum.
17	MR. DAVID WINN: Okay. But so this risk
18	assessment is going to be a preliminary? And, and you
19	know where I'm going is where I'm going is
20	everybody's going to look at this preliminary risk
21	assessment and I think we all agree that because a lot
22	of, some of the data isn't in there relative to foam and
23	additional seep samples and everything else that needs
24	to be done, people are going to get the wrong picture
25	that there's not that much contamination on that base.



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MR. STEVE WILLIS: Yeah, we can may --MS. PAULA BOND: Yeah.

MR. STEVE WILLIS: -- maybe in the introduction of the document indicate that additional data collection is planned and that the risk assessment will be updated with that new information.

7 MS. PAULA BOND: Yeah. And I would also 8 encourage folks maybe not to jump the gun a little bit 9 on the risk assessment. I've heard a lot of, you know, 10 in the tech session vesterday and in the tech session we 11 had before the last RAB, kind of maybe precluding what 12 the risk assessment is going to say. We haven't seen 13 the risk assessment yet either. They are finishing it 14 up right now. So we don't know exactly what the risk 15 assessment is going to say. I would hope everybody 16 would wait until we actually see the, see what the risk 17 assessment says before we kind of, everybody jumps out 18 and make -- jumps to conclusions that it's going to say 19 one thing or another.

20 So just, just everybody kind of keep that in 21 the back of their minds. We, we haven't seen it. We 22 don't know exactly what it's going to say yet, so --23 MR. DAVID WINN: I just want it on the record.

> MS. PAULA BOND: Yeah. Thanks, Dave. Yes? MR. KYLE JONES: Hi. Kyle Jones with RAB. You



1 know, the whole purpose of the risk assessment is to 2 take all this data, the years and sweat equity that you 3 folks have put into, you know, characterizing the site, 4 creating your conceptual site model, and writing or you just keep adding in new data, new data for your remedial 5 investigation. All of that then turns into another б 7 useful document called Ecological Risk Assessment Human 8 Health Risk Assessment.

9 The very purpose of, of drafting those 10 documents is to inform the next step of the CERCLA 11 process which is the feasibility study. So in my 12 experience having assisted clients for year and years 13 and years on superfund matters, I've never seen a risk 14 assessment published before all the data necessary for 15 the feasibility study decisions to be made ever. And I don't understand why it would be done in this case. I 16 17 mean, you, you, we've all talked -- and, you know, the 18 community is very appreciative of the fact that you've 19 identified data gaps and you're going to go figure it 20 out. We'll have new data.

21 Why in the world would you publish a risk 22 assessment without all the data because you're going to 23 have to, as Steve just said, make an addendum. Well, 24 what, what use is the published risk assessment without 25 all the disbursed interim what use is it?



MS. PAULA BOND: Well, the value of the risk
 assessment, again, we have collected, you know, like I
 presented at the last RAB, over 4,000 samples.

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MR. KYLE JONES: Yes.

MS. PAULA BOND: We have enough data to do the risk assessment. So once the risk assessment comes out -- and like Steve said, we may call it, you know, draft, preliminary, phase one, whatever, but we have enough data to do the risk assessment. As we collect additional data in the data gap, the data gap is more for nature and extent, but that data will also be used in the risk assessment.

13 We have collected data from other source areas 14 on the base, the highest concentration areas which all 15 of that data is going to feed into the risk assessment. 16 I don't think additional data gap data that we're going 17 to collect -- and, again, I don't know. I don't want to 18 surmise what the risk assessment is going to say. I'm 19 not, I'm not going to do it either. I'm not going to do 20 it either. But we have enough data to move forward with the risk assessment. That's why we are taking this step 21 22 to finish this, this portion of the RI and do the risk 23 assessment.

It's not that there is insufficient data tosupport the risk assessment. As we collect more data,



it will continue like Dave was saying, the RIs, the
 interim process, that data will be folded in. And if it
 changes something before we get to the feasibility
 study, then we'll look at it then. But we have enough
 data to support the risk assessment at this point.

MR. KYLE JONES: Go ahead.

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MR. STEVE WILLIS: Let me just piggyback on that. As we've all seen P-, our understanding, global understanding of PFAS has evolved and continues to evolve. When we started this, all we were looking at was PFOS and PFOA. Since that time there's been quite a few other compounds that are now regulated. There's state criteria, there's MCLs, RSOs that didn't exist when we started this.

15 And as indicated yesterday, there is new 16 information out on uptake factors for some of these 17 which will impact your risk assessment. Rather than 18 wait forever for this to all settle and we know exactly 19 what we're regulating, to what criteria, what uptake 20 factors, we're going to prepare a report with what we've 21 got and then as things change, new information, new data 22 from the field, we'll update that document. But 23 otherwise we never do a risk assessment. We're always 24 waiting for what's next, what, what additional. So --25 MR. KYLE JONES: I appreciate that iterative



process. And, and that is, you know, that's, that's part of doing any kind of investigation whether environmental or otherwise. I guess I don't know that the community understood what Paula just said that you say you have enough data to do the risk assessment.

Nature and extent is a risk assessment. б Though 7 the risk assessment, a very important, risk assessment 8 consideration, because of the land use whether that 9 nature and extent has been, well, either identified or 10 not as the case may be. So I don't know, at least in my 11 view and my experience that you would say, oh, we could 12 do the risk assessment now because we have enough data 13 when you've already said you don't have enough data to 14 completely identify the nature and extent of 15 contamination.

I, I would very much think that the best way to 16 qo about it -- and, Steve, I understand there's time. 17 18 It takes a long time to write the dang thing. Ι 19 understand that. Go ahead and start writing it with the 20 data you have but don't publish it. Just have it there 21 in draft form, get the new data, if new laws or new MCLs 22 come along, you'll have to consider those, too. But it 23 makes no sense to publish the, the document when you 24 already know you're going to have new data that in every 25 likelihood will, will somehow change that risk



assessment. Get the draft going, get it in place, wait
 for the new data, publish then.

MR. DAVE CARMONA: Dave Carmona, Community RAB. I really appreciate the frankness of what you're telling us here, but ultimately I think the 800-pound gorilla that nobody's talking about is you're not the decision maker. It's the DOD. And our concern that's kind of unvoiced here is if they get a published report from you on the environmental and risk assessment, that they will run with that and shut down the rest of the data gap study.

12 That is our -- that is our real concern here. 13 They have that decision making power to do that. It's 14 within your -- it's written within your contract. 15 You've got to follow their direction. So while I 16 appreciate what you're telling us you're going to do, 17 our concern is will the DOD allow you to do it once you 18 publish.

MR. STEVE WILLIS: Yeah. We're, we're committed to collecting more data without a doubt and we'll incorporate that in, into the RI report as an addendum as well as the risk assessment. So we are not going to take this RI report and risk assessment and stop work.

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MR. GREG GANGNUSS: Dave, this is Greg Gangnuss



1 with the Air Force Civil Engineer Center. You know, 2 I'll, I'll dispel that 800-pound gorilla. This will be 3 an Air Force report. It's not a, our contractor's 4 report. We'll make the decision. Air Force will make 5 the decision on the publication of, of the report. But б I can assure you this, this is just the beginning. This 7 is not any type of end.

8 You know, we're going to -- we're in for the 9 long run. We're going to work with the RAB, we're going to work with the community, we're going to move forward. You know, I, I envision we'll be here a long time 12 working with you on, on getting this work complete here 13 at Wurtsmith. There won't be anybody running out of 14 town, Dave.

15 MR. DAVE CARMONA: Well, I, I appreciate that 16 but the point is and it's in my statement that's the 17 exact same thing as well. You're contractors. You, vou 18 have good intent. But if DOD has data and they make a 19 decision that that's the cutoff point, they're going to 20 make that cutoff point. They've done it here before 21 with decision making.

22 We've seen it in the past and that's the 23 unspoken concern here. I've only been here two and a 24 half years, but some of these people have 15 years 25 experience dealing with this process.



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1 MR. GREG GANGNUSS: I can quarantee you we'll 2 be here five, ten years from now discussing this. MR. DAVE CARMONA: Well, I know you will be, 3 4 but the issue is, is they get the information, they say 5 "we're done. We got the risk assessment, feasibility 6 study done, we move on." You get data gap information 7 to say, "well, that's all well and good," but it doesn't 8 \_ \_ 9 MR. GREG GANGNUSS: When you say "they," 10 you're, you're talking to the "they." MR. STEVE WILLIS: Yeah, it -- the people 11 12 sitting in this room are making the decisions. 13 MR. GREG GANGNUSS: I mean, that's who the "they" is you're speaking to. So, and I, I can assure 14 15 you that we're, we're not, we're not near the end here. 16 MR. DAVE CARMONA: DOD doesn't have an override 17 on this? 18 MR. GREG GANGNUSS: I, I don't speak for DOD, 19 but -- all right. But I, I, I can speak for the Air 20 Force Civil, Civil Engineer Center. And I, and I know 21 the leadership at, at DOD supports, you know, our moving 22 forward with Wurtsmith. 23 MS. PAULA BOND: Yes, Cathy? 24 MS. CATHY WUSTERBARTH: I have -- yes. 25 MR. GREG GANGNUSS: There isn't any secret team


	MEETINGAugust 21, 2024WURTSMITH RESTORATION ADVISORY BOARD MEETING72
1	of folks working in the background trying to shut things
2	down. That's not happening.
3	MS. CATHY WUSTERBARTH: Okay. I want to
4	redirect to a specific action that, that can be taken.
5	Now, it's true that you have foam data in your
6	possession; right?
7	MR. STEVE WILLIS: I'm sorry. Say that again?
8	MS. CATHY WUSTERBARTH: You have foam data in
9	your possession?
10	MR. STEVE WILLIS: Yes, you did send me foam
11	data.
12	MS. CATHY WUSTERBARTH: And that can be
13	included in the risk assessment right now?
14	MR. STEVE WILLIS: It we will look at it.
15	MS. CATHY WUSTERBARTH: Yeah. You told this
16	group, you told this group in May or whenever the
17	presentation happened if there's da "if data exists,
18	we can use it."
19	MR. STEVE WILLIS: I don't recall saying that,
20	but the risk assessment is being finalized now. I did
21	commit that we will collect foam samples and we will use
22	
23	MS. CATHY WUSTERBARTH: But you don't need to
24	collect it. It already exists. And the state actually
25	collected it, so



MR. STEVE WILLIS: But we will use that in an 1 2 addendum to the risk assessment. MS. CATHY WUSTERBARTH: Okay. That's -- you 3 4 have the data now that you can include. 5 MS. PAULA BOND: Arnie? б MR. ARNIE LERICHE: Okay. We fought hard. The 7 foam issue we've been fighting since the first 8 orientation meeting. I said this yesterday. In August 9 of 2017 we brought up the foam issue and we have been 10 fighting every time since. We finally got the attention 11 of the Air Force about one or two, three maybe RAB 12 meetings ago and they put a receptor, potential receptor 13 pathway on the, on the risk assessment chart. 14 MR. STEVE WILLIS: You're talking about the 15 conceptual site model diagram. 16 MR. ARNIE LERICHE: Yes. 17 MR. STEVE WILLIS: Yeah. And that was always 18 there. 19 MR. ARNIE LERICHE: Not one of the drafts in 20 November two years ago it wasn't I don't think. But 21 anyways, it's there. It hasn't been evaluated yet. 22 These samples you have, it's the first time I've heard 23 that you've actually accepted samples to look at. But 24 this, you're committed, he's committed to do, add it to 25 the data gap. So I would suggest that this report, the



1 assessment report, be marked as preliminary subject to 2 the list of committed data gaps that you have committed 3 to that you've accepted as important enough to raise a 4 question that you need the question answered one way or 5 the other.

And that way I don't see anyone who could say, well, it's going to end because those, that list of data gaps is listed right in the introductory part of the report unless you're on to some contractual issue to sign off on the final report with GSI, the contractor, so that they are done. If that's the reason you're using, then I hope that you can find another way to listen to what we're saying and not close it out.

14 Because it's just a inference of no risk that 15 we fear is going to come out of that report for several 16 The fish that were sampled, they only caught reasons. 17 Now that's a stroke of bad luck maybe, but it's one. 18 the most important fish money-wise to this area because 19 it's a sporting fish and that's steelhead. And someone 20 in the risk assessment group said, "well, brown trout 21 are the same," you know, they eat similar stuff and so 22 forth. No. People don't come up to the Au Sable River 23 for brown trout because they don't get caught very often 24 and very much.

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Steelhead is a multi-million dollar business in



1	this area and it has a long history after the salmon
2	left. So, but it was just blown away, "no, we've got a
3	substitute, we're fine." Well, we don't feel that we
4	were fine because of that. And now you're saying, well,
5	the risk assessment's going to be finalized and there's
6	going to be risk, yes, and so forth. I suggest you look
7	into some way of not final, final it so that it receives
8	and gets the right attention to the data you collect and
9	the data gaps.
10	MR. DAVID WINN: Paula?
11	MS. PAULA BOND: Yes, Dave?
12	MR. DAVID WINN: It's Dave Winn, from the RAB.
13	I want to refer to your sheet, item sheet 27. You
14	talk, it says P-, POF-, POFS (sic) detected above 12
15	liters, 12 nanograms per liter with an asterisk at Van
16	Etten Lake, Au Sable River, integrated these six
17	areas. And then on the bottom you talk, it says,
18	"Surface water delineation value is EGLE's Rule 323.1057
19	Water Quality Standards."
20	MS. PAULA BOND: Uh-huh.
21	MR. DAVID WINN: So what this is telling me is
22	that the, you guys are exceeding, Air Force is exceeding
23	EGLE's rule at Van Etten Lake, Au Sable River, Three
24	Pipes Ditch and Clark's Marsh so it's everywhere. So
25	that's why I guess I want to know from EGLE what are



1	you guys going to do?
2	MR. ARNIE LERICHE: Because that standard of 12
3	is based on protecting the fish that we're going to be
4	eating. That's what it's based on. It's not our direct
5	consumption, our effect that we're drinking that water
б	in the Au Sable River. It's what the fish are absorbing
7	and then we eat the fish. You've got to look at it that
8	way. That 12 is important, it's critical.
9	MR. KYLE JONES: Paula?
10	MS. PAULA BOND: Yes.
11	MR. KYLE JONES: Kyle Jones again from the RAB.
12	I, I really you're hearing us from several angles on
13	this publishing a, a risk assessment that doesn't have
14	data that you know you're going to have to you are
15	and have committed to go get.
16	MS. PAULA BOND: Uh-huh.
17	MR. KYLE JONES: The foam is actually a very
18	good reason not to publish because that's not a nature
19	and extent issue. It's a direct contact issue. And
20	that is a much larger receives much larger weight
21	within the risk assessment analysis than filling in some
22	plume concentration so that you better understand nature
23	and extent. You've committed to getting more, obtaining
24	more foam samples and analyzing them and incorporating
25	them into the risk assessment.



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I, I -- honest to goodness, I -- you can do all the things you plan to do, write it up exactly how it's going to be written up, just don't publish and wait until you have the important data and you've analyzed the data that you know you have to analyze including this foam.

7 If, if kids at the YMCA camp are splashing 8 around in the foam, that ought to be accounted for in 9 the risk assessment. If dogs are lapping up, you know, 10 tasty stuff at the, at the shoreline on the east side 11 where there's foam, that ought to be accounted for and 12 right now it won't be.

13 So you're going to publish a document that 14 doesn't account for a direct contact and like, very 15 likely ingestion path, a risk pathway. So I, I really 16 would -- I just -- I guess that's it. I don't 17 understand it.

MS. PAULA BOND: Thank you. Arnie?

MR. ARNIE LERICHE: There's a whole other potential impact that hasn't even been mentioned or thought of here and that is the economic potential decisions that people make or decide not to come here based on the contamination on the base.

And Scott can give you more details at another time maybe. But it's important that we don't give



1 anyone a false promise and that's what you would be 2 doing to some people who only look at the headlines. 3 And the risk assessment report, risk assessment, boy, 4 they're going to answer the questions I've always had. 5 Well, it's not so bad. It's only one spot, let's say. б One pollutant in one spot in the base and they're going 7 to circle that with barbed wire and take care of it.

8 I'm not going to buy a house there. So they, 9 they come up here. But we haven't handled the fish issue, do not eat the fish in Au Sable for most species and Van Etten Lake is some not -- you can't eat so many 12 in a month. And it's just not fair to give anyone a 13 false hope. We've been through it too long for the last 14 14 to 15 years.

15 MR. KALAN BRIGGS: So I just -- this is Kalan 16 Briggs, EGLE. I just want to respond to you, Dave. 17 Just trying to understand your question and what will 18 EGLE do about the detections above our rule, quality 19 standards. Are you asking if we're going to enforce 20 upon those standards as we speak?

21 MR. DAVID WINN: Yeah. Kalan, what this is 22 telling me is that it says "PFOS detected above 12 23 nanograms."

24 MR. KALAN BRIGGS: Correct. Certainly that's 25 undetectable, yes.



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MR. DAVID WINN: Okay. So if, if they're above your standard, what action is being taken? Are we just going to continue to let it go above the, the 12?

4 MR. KALAN BRIGGS: So may-, maybe Kyle can 5 explain more, but in CERCLA there is sovereign immunity. We can't enforce upon our standards to any federal б 7 entity that's implementing CERCLA at a site. Our 8 standards and rules come into play during ARARs. It's, 9 it's fruitful for us to expedit-, expeditiously as 10 possible get to feasibility study so we can get our 11 ARARs incorporated into a ROD as fast as possible. So 12 ex-, expediting these milestones, getting to, to the ROD 13 as (inaudible) is, is advantageous for our (inaudible) 14 facts. Until then, we can't do anything because 15 sovereign immunity. That is a age old battle that all 16 the states have with their --

MR. DAVID WINN: Okay.

18 MR. KALAN BRIGGS: So there are examples to it.
19 This is how --

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MR. DAVID WINN: Okay.

21 MR. KALAN BRIGGS: -- so we cannot do a thing 22 to enforce compliance until we are, (inaudible).

MR. ARNIE LERICHE: Sir, could you identify
 yourself and what position you're in? Appreciate it.
 MR. KALAN BRIGGS: I'm Kalan Briggs with EGLE



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	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 80
1	RD. I'm the superfund section manager for all our
2	superfund and demolition sites in the state.
3	MR. ARNIE LERICHE: Okay. And you're saying
4	that the 12 because it's sovereign.
5	MR. KALAN BRIGGS: That it's an unacceptable
6	value or the detections in the lake are unacceptable as
7	far as EGLE is concerned. We can't enforce compliance
8	on a federal entity that's implementing CERCLA. That is
9	sovereign immunity until we are post-ROD. That is, that
10	is
11	MR. ARNIE LERICHE: Until what?
12	MR. KALAN BRIGGS: Until we have our ARARs are
13	accepted or our values are accepted as ARARs when it
14	comes to the ROD.
15	MR. ARNIE LERICHE: And you're in the currently
16	the status of the ARARs for the state are what?
17	MR. KALAN BRIGGS: The status of the ARARs,
18	there are no ARARs for the whole base-wide remedy
19	because we're not there yet, CERCLA process.
20	MR. KYLE JONES: Arnie? This is Kyle Jones
21	again.
22	MR. ARNIE LERICHE: Yeah, it's a technicality
23	here.
24	MR. KYLE JONES: It's, it's just a legal thing.
25	If it was, you know, ABC Manufacturing Company, then,



the state could enforce. The fact is it's the federal 1 2 government, the U.S. Constitution and tons of case law 3 says the states can't enforce. MR. ARNIE LERICHE: Yeah. 4 5 MR. KYLE JONES: Now what, what, what that б rule, though, is very important to keep in front of us 7 because when it comes time for the feasibility study to 8 be conducted and completed and then the record of 9 decision will be written, then the record of decision 10 for the final remedy must obey these ARARs. That's the 11 time in the CERCLA process. 12 MR. ARNIE LERICHE: I know enforcement timing 13 is --14 MR. KYLE JONES: Okay. 15 MR. ARNIE LERICHE: -- I understand that. But 16 that detail wasn't mentioned here until the very end. 17 But the Air Force has already, at least verbally and 18 maybe in writing, already accepted the Rule 57 or 12 19 part per trillion in several instances and meetings over 20 the last year and a half. 21 So do we -- we don't have to worry about 22 because we have so many things to handle here, trying 23 not to throw a hand grenade in the, in the middle of it. 24 MR. KALAN BRIGGS: And they're delineating to 25 all the appropriate standards that they know they're



1 going to have to accept those ARARs in the future. 2 That's what you're saying. They, they cannot accept 3 those ARARs formally in a ROD. The only RODs we have 4 are for remedies that are being implemented on an 5 interim basis.

So formally in our decision document for all of 7 our cleanup criteria has not been implemented yet. So I 8 quess going back to the former questions of what the risk assessment will inform and decisions being made based off of a lack of complete data set, that alone to us is going to be evaluated, will need to be remedied 12 towards a cleanup value. Right?

So we would never -- if, if Air Force were to 13 14 try to pull the rug from underneath this entire 15 investigation by an unfavorable decision out of, out of 16 the risk assessment, rest assured despite what DOD says, 17 we would never accept that. We, we would, we would 18 fight to the end on that because there's already 19 unacceptable values that we acknowledge, that they 20 acknowledge. So I can reassure that they're not going 21 to pull the rug out and walk away from a risk 22 assessment. That would make no sense to say no risk, 23 we're not (inaudible) the required remedy. So I hope 24 that gives you additional reassurance.

MR. DAVID WINN: I appreciate the



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1 clarification.

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MR. KALAN BRIGGS: Sure.

MS. PAULA BOND: Yes. Mark?

Mark Henry. I'd like to bring MR. MARK HENRY: up one thing that I've brought up in the past and we've been talking about foam. Well, foam is a symptom of the what's left over after the AFFF gets to the lake, and that foam tends to move whichever way the wind blows, piling up on people's beaches and whatnot and you have committed to doing some beach sand analysis.

But what I'm going to suggest is that pretty 12 much all of the properties surrounding the lake that 13 have beach front property have PFAS on the sand on their 14 private properties that belongs to the Air Force, belonged to the Air Force. The current concentrations of PFAS that are discharging to Van Etten Lake probably 17 pale in comparison to the concentrations that were discharging into the lake when firefighting operations, the training was still going on.

20 We've had 55 years of PFAS discharge to that 21 lake and we're seeing the tail end of it and the, the 22 PFAS is no longer being discharged on the ground. Ιt 23 hasn't been since 1993. But regardless, we still have a 24 foam problem. And so all the PFAS that went into Van 25 Etten Lake that formed foam over the last 55 years, a



lot of that has ended up on people's beaches and the sand on those beaches is likely contaminated.

And I brought up about pica and kids, small kids eating that sand and getting a potential exposure that way and yet you're proposing only a very limited evaluation of the properties that the Air Force has affected around that lake. I would propose that as part of the data gap investigation that a concerted effort be put into defining the PFAS contamination on private beaches surrounding the lake so that that is actually defined and I guess memorialized in the RI document.

MS. PAULA BOND: Thank you, Mark. Arnie?

MR. ARNIE LERICHE: Well, Mark, I, I swear that you must be bugging my house because last night I was reviewing the, the Alert ROD and looking at the health risk assessment chart that shows what receptors they're basing their risk assessment on.

And they don't have property owners along any place where there would be a potential for the foam to be blown up on. So I wanted to add an AI to add that column on this so it's clear that there's a place for that data that you're going to sample for, but there's also an analysis by the Air Force to see what the, the foam effect is and what it's potential risk is.

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So I, I'll submit the -- you can take a photo



	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 85
1	of this today if you want. And that's for the foam
2	pathway.
3	MR. STEVE WILLIS: Okay.
4	MR. ARNIE LERICHE: So I wanted to make that
5	clear.
6	MR. STEVE WILLIS: I'll take a look at it.
7	MR. ARNIE LERICHE: Okay.
8	MS. PAULA BOND: Dave? Yeah.
9	MR. DAVID WINN: One more question. In your
10	presentation I didn't see anything about the east side
11	of Van Etten Lake.
12	MS. PAULA BOND: Uh-huh.
13	MR. DAVID WINN: What is the status of the work
14	plan that was, that was talked about at the last RAB for
15	the east side of Van Etten Lake between Air Force and
16	EGLE? And as part of that, it's my understanding
17	and, Steve, I guess I'd like a clarification from you
18	are you still going planning to use the Battelle
19	signature process as well as the septic influence
20	investigation as part of that study?
21	MR. STEVE WILLIS: Yes. We do intend to do
22	that. We also have, as Mark indicated, we do have
23	sampling on the other, soil sampling on the other side
24	of the lake. We've got additional transducers and
25	piezometers to put over there.



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1	MR. DAVID WINN: I guess my question is the
2	Battelle and now the signature analysis and the septic
3	influence. We had plenty of conversations about that.
4	And as I understand it, that was not and I think in a
5	lot of people's opinion and I'm going to talk for
6	myself, is that it was not a very good analysis. So I
7	thought the decision was is to cancel it.
8	So why isn't that being cancelled and utilizing
9	that funding somewhere else for better?
10	MR. STEVE WILLIS: So I, I think it still
11	provides us a useful line of evidence. It is not going
12	to give us a definitive I do not expect that it's
13	going to give us a definitive yes/no on anything. I
14	think it is going to provide another line of evidence
15	for potential sources of the PFAS.
16	MR. DAVID WINN: Potential sources of PFAS for
17	what? Coming off the base?
18	MR. STEVE WILLIS: On the other side of the
19	lake.
20	MS. CATHY WUSTERBARTH: Oh, wait.
21	MR. ARNIE LERICHE: Into the lake.
22	MR. DAVID WINN: Now we're going back to now
23	we're going back to the, the it's not the Air Force it's
24	
25	MS. CATHY WUSTERBARTH: You need some right



1 word --

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2 MR. ARNIE LERICHE: They gave up on that, the east side. 3

4 MR. STEVE WILLIS: I'm just collecting data at 5 this point.

MR. DAVE CARMONA: Dave Carmona once again, 7 Community RAB. The discussion we had about Battelle 8 involved the fact that there is no peer review data on this process to support it and nobody wants to review this data because it's difficult to prove or disprove their thesis.

12 So what would be the purpose of using something 13 that unlike the fractionation which is proposed, the 14 temporary has been thoroughly peer reviewed. We have no 15 issue with that. But we have an issue with using 16 something that is at best a shot in the dark to prove 17 that the Air Force is not responsible. This, this 18 certainly seems like the tail wagging the dog and 19 somebody in search of a pilot project to prove their 20 theory using governmental money indirectly and that just 21 rankles. Thank you.

22 MS. PAULA BOND: Thanks, Dave. Yeah, Mark? 23 MR. MARK HENRY: I have a question about the, 24 the upcoming work on the UFP QAPP addendums, especially 25 on the east side of Van Etten Lake. MDHHS data of



1 residential wells shows that from about right here from 2 Van Etten Lake all the way to the lakeshore of Lake 3 Huron and actually from about here all the way to the 4 Lake Huron shoreline that residential wells far away 5 from Van Etten Lake -- there's a whole community down б here -- that there is a smattering of PFAS found in 7 residential wells there. Which gives an indication that 8 PFAS has transported from some source to that area.

Is that area on both sides of US-23, between US-23 and Lake Huron, going to be investigated by the Air Force during this RF?

MS. PAULA BOND: So we have collected some data down there. As you know, the CSM team has been working on looking at all the data that we've gotten down there and I haven't seen the revised CSM report, so that's due any day now, too.

So once we look at that -- and, again, if there are data gaps, we've collected a lot of data, the transducer data that we have. If there is a data gap that we need to look further and go that way, then we will. But we're trying to determine the groundwater flow specifically in that area because it, there is a data gap there.

24 So once we look at the new CSM data and if 25 there's something shows that we'll follow the data like



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we've said, so --

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2 MR. MARK HENRY: Well, so far with the 3 exception of the wells that have been installed recently 4 for the transducer study and I quess a couple of the AS locations, it's been mainly the state that has done work over there and you guys don't use the state data. Ι 7 mean, you may consider it in the background, but you 8 don't publish it along with your data for all your 9 reasons.

10 But the Air Force, I have not seen any plans of 11 delineating the nature and the extent of the 12 contamination over there. All we have is residential 13 well data. And most scientists do not like to use 14 residential data for various reasons, but vertical 15 aguifer sampling over there, that has never been done 16 and that is, that should be part of the RI.

17 They should be following, the, the Air Force 18 should be following that contamination until it 19 ultimately discharges in Lake Huron which is where that 20 water is going.

MS. PAULA BOND: Well, you know, we are 21 22 following the plumes until they end. So whether that is 23 here or somewhere farther, there are -- we have data in 24 between around Van Etten Creek that show that the plume 25 does not extend beyond there. So we have that data.



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1	We're going to look at the CSM with the stratigraphy
2	data that Colin has, has produced. We're going to look
3	at all that together. And if there's a data gap there
4	that we think that something may be moving beyond based
5	on that data, then we could potentially go farther.
6	But currently we have monitoring wells at the
7	perimeter of that, that plume that indicate that it
8	doesn't go
9	MR. MARK HENRY: At the perimeter? On the left
10	eastern perimeter, Lake Huron?
11	MS. PAULA BOND: On the west, no. At the
12	southern end where it comes down.
13	MR. MARK HENRY: That's fine. I'm talking
14	about we already know the horse is out of the barn.
15	MS. PAULA BOND: Uh-huh. Yes, it is out of the
16	barn.
17	MR. MARK HENRY: It is all the way to Lake
18	Huron. Where my house is on was on Beach Street when
19	I rented it there, that's literally within a stone's
20	throw of Lake Huron and they have PFAS in their well
21	currently. It's below drinking water standards thank
22	goodness, but it's there. And that is where that's a
23	water table well.
24	We have no idea on what the vertical
25	distribution of PFAS is there and I'm asking that the RI

finish determining the nature and extent of the contamination all the way to Lake Huron. Not if they're -- there is a data gap. You've done no work over there. The whole thing is a data gap. So I recommend that you follow the spirit of CERCLA and determine the nature and the extent of the contamination including discharging to Lake Huron.

MR. STEVE WILLIS: So we have collected data on the south end of the lake and along the creek and based on those results, we've stepped out. And as we move further north from the east side of the lake, if we find PFAS, we'll keep stepping out and we'll delineate until we find the end of it. But --

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MR. MARK HENRY: Okay.

MR. STEVE WILLIS: -- it's a progressive process. It's not a jump to the end and then assume everything in between is, is, that it's contaminated. We need to step-wise chase that.

MR. MARK HENRY: Well, I could pull up a map on my laptop that shows between US-23 and Lake Huron there's about 20 homes there in that community that have PFAS in their wells detected. And those are all shallow, probably hand driven wells.

24 And there may be much higher concentrations 25 than the screens of those wells what are just below the



water table. And it is incumbent upon the Air Force to
 determine the nature and the extent of that
 contamination. Not just following it out and then
 stopping when you don't find it. We know it's there.

So I highly recommend that the Air Force follow the spirit of CERCLA and determine what's going on there and determine if the Air Force is responsible for it or if you can find another source, then you can direct your anger towards them.

10 MR. GREG GANGNUSS: Hey, Mark? The Air Force will determine nature and extent. And we've said this 11 12 before, we, we (inaudible) our CERCLA process. We will determine the nature and extent. We're not done with 13 14 the RI, we're not done with the FS, we're not done with 15 any of this investigation until the ROD is signed. And 16 that's a long ways off. But I see a lot of the group 17 here, we're not jumping to conclusions. You know, let's 18 see the report, let's see the data.

And as Steve has, elucidated, you know, we are going to step out process. We are determining where that plume is or where, where it's not. That is the nature and extent of our, of the investigation. That, that's, that's our goal. We can't get a final ROD without having full nature and extent.

MR. BILL GAINES: Bill Gaines here. Mr.



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1 Gangnuss, part of what's happening here probably 2 predates your involvement with this. I'm not sure how far that goes. But I've sat on this board since its 3 4 In that time I've had not on one inception in 2017. 5 occasion, but on a number of occasions heard members of the Air Force say "we will accept the data that is there б 7 regardless of whether it was originated by the Air Force 8 or by the state."

9 And there's lots of data running around that 10 isn't in the 4,000 that, that Paula talks about. 11 There's fish in one of the lakes that isn't above 12 12 nanograms per liter that the state has tested and found 13 are safe to eat. Yet that particular lake isn't even 14 included in your picture of what you think is in the 15 area that you're going to work on. This residential 16 well data is after all valid data, testing data, that 17 indicates where things go.

18 The state has done tons and tons of testing 19 that I, I really haven't -- and maybe I just haven't 20 seen it, but really isn't included in your analysis or 21 in the basis for your conclusions. Now, data is data is 22 data. Some of it may not be as wonderful as others. Ιf 23 you -- I, I don't think it's really constructive to say, 24 "gee, this piece of data doesn't meet the set of 25 standards that we believe that it ought to" and then



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discard it totally. It is at least an indicator of
 where strenuous investigations ought to take place. And
 the fact that the east side of Van Etten Lake is still a
 huge data gap really gives me an enormous degree of
 skepticism about the commitment behind the words that I
 hear. Thank you.

MS. PAULA BOND: Scott, you had a question and then we have one more --

9 MR. SCOTT LINGO: Scott Lingo, Community RAB. 10 Mark kind of makes a great point. That distance from 11 the Loud Drive or the eastern shore of Van Etten Lake to 12 Lake Huron is minimal as far as miles or yards or feet 13 and that area is a third or less the size of the entire 14 base but yet we're getting no testing over there. And 15 it's shown that PFAS has hit the wells on Loud Drive 16 over the years.

My blood's been tested. I got five different 17 18 PFAS, PFNA, PFxHS (sic), PFOA, P-this, P-that in my 19 blood at 95 percent above the whatever it is. I'm just so upset. "Well, our source, there might be another 20 21 source on the east side of the lake." Source my hind 22 end. The source is coming from the Air Force base. 23 There's never been any commercial development over 24 there. There's never been any industry over there. My 25 folks had a cottage at 6169 Loud Drive from '71 to '94



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1 and I drank that well water and I made the beards and I
2 made the mohawks and I played in the sand and the water
3 went up and it went down and we road our dirt bike on it
4 and we played in it and here I sit.

And he's telling me that he's not going to walk or away or no one's going to walk away. Well, I'll tell you what. We feel abandoned. We feel like not enough is being done. I call this person, "what do I do with my health care?" "There's nothing until you get cancer." How many other people in this room are at 95 percent or above on five chemicals that lived on Loud Drive?

I am. I bet there's not one in here and I'll bet you there's not one person in here that has their blood like mine from being on Loud Drive from age 5 to 21. And here I sit listening to all this BS. Well, you guys keep arguing and when I got cancer, I hope my family can come after this because I'm so fed up with it all. Thank you.

20 MS. PAULA BOND: I think we have a question 21 online. Amy?

MS. AMY RAUSER: Yeah. Mark Weegar (phonetic), did you want to comment? You'll have to unmute yourself. Or I can just read your comment. He commented, "There are several studies including a study



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#### August 21, 2024 MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING 96 by the State of Wisconsin which has linked to PFAS in 1 2 shallow groundwater and private drinking water wells to 3 septic tanks." 4 MS. PAULA BOND: Amy, can you use the 5 microphone? б MS. AMY RAUSER: Oh, it's not working? "There 7 are several studies including a study by the State of Wisconsin which has linked PFAS in shallow groundwater 8 9 and private drinking water wells to septic tanks." Just 10 an online comment. 11 MR. SCOTT LINGO: We didn't have any washer or 12 dryer or nothing. We drank our water out of the well 13 and poop went in the tank. 14 MS. PAULA BOND: Are there any other questions? 15 Anything online, Amy? That was it? 16 MR. DAVID WINN: Paula, are you going to go 17 through the timelines? 18 MS. PAULA BOND: Yes. Steve's going to go 19 through the, the schedules. 20 MR. STEVE WILLIS: I'll jump through the timelines. Just if we could, let's take a quick break. 21 22 MR. DAVID WINN: Yeah. 23 MR. STEVE WILLIS: We've been, been at it for 24 two hours. 25 MS. PAULA BOND: Thank you.



1	(Off the record).
2	MS. JESSIE HOWARD: All right. Thank you to
3	everyone. Real quick, before we get started on the
4	second half of tonight's meeting, do we have any state
5	legislators or any other local state officials who would
6	like to introduce themselves to the RAB, state that
7	they're here, either with us virtually tonight or in the
8	building? Anybody that we missed earlier?
9	MS. KELLY LIVELY: Federal Senate, U.S. Senate.
10	Kelly Lively with Senator Peters.
11	MS. JESSIE HOWARD: Okay. If you would just
12	repeat that for the record? I'm sorry. He's bringing
13	you a mic.
14	MS. KELLY LIVELY: Kelly Lively with Senator
15	Peters.
16	MS. JESSIE HOWARD: Thank you. And I think
17	that we were going to have Paula go through the schedule
18	or Steve?
19	MR. STEVE WILLIS: I am.
20	MS. JESSIE HOWARD: Following the schedule?
21	Okay.
22	MR. STEVE WILLIS: Okay. So the next three
23	slides are the schedule timelines that you guys have
24	asked for. This first one is kind of the one year, 12
25	month forecast. As Paula indicated earlier we still got



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the RI transducer data that we're doing through
 November. We're working on that RI report.

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The plan at this point is to, to finalize that in March of next year. And starting the early part of next year we'll do the, start working on the data gap investigation and then follow that with the feasibility study.

For the Alert Aircraft Area, as Paula indicated, construction started. Our plan is to finish that and have the system up and running by the end of the year and then we'll transition into the operation and maintenance of the, the system. We'll continue to monitor, monitor it and make any upgrades to the system we need to as we collect additional data.

The Three Pipes Ditch, we are monitoring. We had the pilot study, but we did terminate that as we've talked about previously. But we are continuing to collect some data there and that will feed into the, the CPA recommended IRA for that site.

And for the next IRA, it's the DRMO and LF30 and 31 landfills. So the plan is to start that in October. And this, this is kind of a big view here, but the first step of that IRA it is a pre-design investigation. That was recommended by the CPA team and is one of the milestones that we will complete before we



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1 go into the final design and proposed plan, remedial 2 design and implementation.

So if we move to the next slide. This takes those activities and rolls them out for the next five So I talked about this first couple, couple with vears. the RI. You've got the data gap and feas- -- data gap investigation and feasibility study, follow that with the proposed plan, record of decision, the remedial design and then the actual remedial actions that would be implemented.

For the Alert Aircraft Area IRA, the ROD has 12 been signed, we are in the construction phase and then 13 we'll move into the operations and maintenance. Three 14 Pipes as I mentioned, we'll study through -- I think actually I've got that wrong. We're studying that, collecting that data through November.

17 For the DRMO and LF30/31, this shows the IRA 18 over the next five years. So you can see that first 19 phase is the pre-design investigation recommended and 20 the critical process analysis. We'll move into the 21 design concurrent with that. We'll start working on the 22 proposed plan. We've got the 30-day public comment 23 period for the proposed plan as well as the public 24 meeting. We'll do the record of decision. And once all 25 that's done we'll move into construction and then



1 operation and maintenance of the system.

2 And the next slide is another five year outlook 3 and it is for the Three Pipes Ditch and the wastewater 4 treatment plant IRAs. Again, both of those, we'll start 5 them off with a pre-design investigation, we'll move into the remedial design phase, concurrent with that б 7 we'll do proposed plan, we'll have a public meeting, a 8 30-day public comment period, a record of decision and 9 then start construction of the system. Right now those 10 two IRAs are on pretty much the same timeline. 11 MR. DAVID WINN: Steve, I have a question. Can 12 we go back to the DRMO and, and the, and the --13 MR. STEVE WILLIS: On slide 34? 14 MR. DAVID WINN: Well, DRMO and the -- yeah, 15 slide 34, please. Right now you're showing a year and a

half for the pre -- what, what do you call it?

MR. STEVE WILLIS: Pre-design investigation.

18 MR. DAVID WINN: Pre-design investigation.19 What does that include or what is that?

20 MR. STEVE WILLIS: It's going to include 21 writing a work plan, going out and collecting the field 22 data, getting the lab results, validating the data and 23 writing a report.

24 MR. DAVID WINN: So the data that you currently 25 have right now is useless?



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MR. STEVE WILLIS: No, we use that, but recall 1 2 that the CPA team recommended based on the data we have 3 now, we need additional data to do a final design on 4 these next IRAs. And so we are taking that to heart and 5 collecting that data before we start design. б MR. DAVID WINN: Okay. So you can't, you can't 7 do the pre-design -- we call them pre-design 8 investigation while you're doing the designs? You know 9 what the system's going to look like; right? 10 MR. STEVE WILLIS: Not necessarily. Because 11 particularly for the landfills we've got a lother (sic), 12 lot of other contaminates of concern coming from the 13 landfill that is going to make this treatment system 14 look different than the others we've done because we've got to deal with metals, VOCs, and some other 15 16 contaminants that we have not had to deal with at the 17 other sites. 18 MR. DAVID WINN: So we're not going to see any 19 of these I- -- would -- but this is an "IRA." It's not 20 a final remedy. 21 MR. STEVE WILLIS: That's correct. 22 MR. DAVID WINN: So we're not going to see 23 anything until the fourth quarter, or first quarter of 24 '28. So we're four years out before this is going to be 25 done.



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MR. STEVE WILLIS: That's correct.
MR. DAVID WINN: Aren't you so you're
telling me you're going to be further than that for the
reme I mean, this doesn't the remedial design
will be, should be complete by then; right? I mean,
I'm, I'm grasping. This
MR. STEVE WILLIS: Yeah. We'll be, we'll be
probably working on final remedies about that same time.
MR. DAVID WINN: So you're going to do an IRA
while you have the remedial
MR. STEVE WILLIS: So, so these, these IRAs may
be part of the final remedy.
MR. DAVID WINN: So they're not IRAs.
MR. STEVE WILLIS: They may not be by the time
we implement them.
MS. CATHY WUSTERBARTH: Oh, my god.
MR. ARNIE LERICHE: That's the way it works.
That's always been the way it works.
MR. DAVID WINN: That's why it's moved out.
That's why it's moved out a year and a half; right?
MS. JESSIE HOWARD: Mr. Henry?
MR. MARK HENRY: As I recall the original
timeline for the landfill $30/31$ and DRMO area
implementation is 2025 and now you're pushing it out
three more years. So you're going to allow the



contamination to migrate for three more years before you 1 2 intercept it. It, it seems much too long a time for a, 3 such a very simple system. MR. STEVE WILLIS: So the 2025 date was the 4 5 start date and that still is the start date for, for б the, for this system. 7 MR. DAVID WINN: No. October -- September --8 you're supposed to have an order. You told us 9 originally you were going to have an order placed by the 10 end of September because you have the funding for both 11 the DRMO area and LF30/31 by the end of September of 12 this year. 13 MR. STEVE WILLIS: And I will. 14 MR. DAVID WINN: Okay. So from that we're 15 talking about a little over three and a half years 16 before these systems will be functional. 17 MR. STEVE WILLIS: That's correct. 18 MR. DAVID WINN: We're going backwards. I, I, 19 I have a -- I don't understand that one. Maybe I'm the 20 only one, but --21 MS. JESSIE HOWARD: Tim Cummings? 22 MR. TIM CUMMINGS: Yeah. Thank you. You know, 23 I've spoken and said this at past RAB meetings. I feel this meeting calls for, for me to repeat myself. 24 Some 25 seven years ago when I attended my first BCT BRAC over



at the trailers on the old base, I remember being in
 the, in the meeting with Dave Strange when it was
 announced that we had just discovered that the
 contamination had crossed the property line of the Air
 Force base.

And it was like shock and horror. And after б 7 having already listened to some of those meetings and 8 watched the speed that I was already starting to see 9 which didn't have nearly the years that we've been 10 sitting here as a RAB, but sort of extrapolating the 11 speed out and realizing we've spent all this time 12 documenting, we've spent all of this time researching and digging and taking up samples, and, and collecting 13 14 it, you know, it's the sweat of, of the data collection 15 and I commented that CERCLA in its speed was outpaced by 16 Mother Nature.

And that by the time we get to what I call this point here today, the landscape would be entirely different and whatever we've got on paper is obsolete. Because by the time you guys make a decision, by the time that we collect all the data -- and pardon the expression -- CERCLA jerk about it, we will end up being noth- -- just nowhere.

24And I'm sorry. I'm frustrated too. I've25certainly -- people have expressed their frustrations



this evening. But I think, I think that this is a broken system. I think CERCLA has -- I think CERCLA, the intention of it, the why it is -- why it was created and designed to be what it is I understand it. However, what I do not understand is the absolute unmitigated slow play. It's just slow motion. This is molasses on a cold winter day. That's progress.

8 MR. DAVID WINN: Steve, I -- Steve, I have 9 another question. The, the Three Pipes timeline and the 10 wastewater treatment plant, you're showing right now 11 that the construction would start in second -- third 12 quarter 2028. But if you go up to your timeline, the 13 final remediation design is going to be completed by 14 second quarter of 2028.

So the IRAs are going to be done after the final remediation design is complete. Explain that to me.

18 MR. STEVE WILLIS: Yeah. We -- there is the 19 potential on final remedies that we may have to do a pre-design investigation there. But at this point we 20 21 have, have not identified what those remedies are and 22 what they would be to know what additional data we may 23 We hope to collect a lot of that in the data gap need. 24 investigation.

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MR. DAVID WINN: So the four IRAs that were



1 requested and were evaluated by the CPA team, they're 2 really not IRAS. That's what I'm hearing. I don't know 3 if anybody else would agree with me or not, but they're 4 not IRAS. They're final remedial designs. I agree with 5 Tim. This is going backwards.

MR. KYLE JONES: Could I -- Steve, could I ask questions on this? First of all, Tim, I, I would encourage you not to blame the statute, but the entity that is following the statute.

In my past life, chief environmental counsel at Chrysler, if we were the PRP at this site, EPA would not have tolerated the, the pace and we would have gotten it done. So that's just -- it's not CERCLA. CERCLA is cumbersome, no doubt about it, but it's effective.

So the other point I wanted to make and this is 15 16 really directed at Steve and Mr. Gangnuss and anyone 17 else who has decision making authority about the breadth 18 of the, of, and, and the actual design. I have brought 19 up before that the statute, CERCLA statute, and the 20 national contingency plan regulations call for any 21 interim remedy to stop or prevent human health or environmental exposure to the greatest extent possible 22 23 without having gone through the feasibility study and 24 the final remedy.

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The Air Force has repeatedly not done that and



has designed IRAs to capture what they've characterized as the really bad stuff. The really, really high concentrations in the plume. Laudable as that is, there's lots and lots and lots of migration of PFAS that's continuing by those extraction wells and into the lake or into the marsh and in, or into the ditch and into the river and eventually to Lake Huron.

8 Now we're looking at this five-year forecast 9 and it turns out that the plan for conducting and 10 investigating, designing and conducting IRAs, the I- --11 the four IRAs that the Air Force was so happy to 12 announce and we were, too. We were delighted at that. 13 Now, though, with the timing the, the, the full or near 14 full remedy that we had asked you to do for the interim 15 remedies now has to be done because it's going to be at 16 the final remedy stage.

17 So I would, at least with respect to the Alert 18 Aircraft Area, I know you've started construction, you 19 have a signed record of decision. Record of decisions can be amended. I would hope that you recognize the 20 21 sort of irony and fallacy -- or not fallacy, but the 22 irony and the, as I said yesterday -- and excuse this 23 language -- but bass ackward (sic) approach to, or at 24 least the timing of all this.

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You're going to have to do final remedies for


1 four areas of the site that were once thought to be 2 interim remedies. You've got one that's designed to be 3 that, that narrow let's just get the hot stuff and I 4 would ask that you just recognize the actual facts of 5 now the situations and expand the, the Alert Aircraft б Area IRA to capture as much as possible. And if you 7 need to do the, the data gap, start up. That's, that's 8 really what I wanted to point out.

9 MS. JESSIE HOWARD: Thank you. Did that 10 conclude the timeline?

MR. STEVE WILLIS: Yeah. I don't have any additional slides, so we'll go to the next item.

(RAB member questions at 7:38 p.m.)

MS. JESSIE HOWARD: Okay. So next we would move on to the RAB member questions. And I know that Mr. Henry has prepared a visual aid for us. Can you give us just a second?

18 MR. MARK HENRY: So those of you who were at 19 the technical session yesterday, this is going to be 20 kind of a repeat of some of that. For those that 21 aren't, it may give you a, some insight into how I'm 22 looking at this.

I took two of the maps that had been provided to the RAB in the May 2024 RAB meeting and what I did is I took the plume, the colored portions of this map here,



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and I put it on top of this map here the lower map here
 shows the locations where the sediment samples were
 collected that are going to be used to evaluate the
 ecological risk at this site.

Next slide, please. And so this is what that looks like. And what I did is I broke that down into four areas and the next four slides I'm going to go through those.

9 Next slide, please. This is the most northern This is the YMCA camp, this is the Alert Aircraft 10 one. 11 Area that we've been talking about an IRA being 12 implemented rather soon. And what I want to draw to 13 your attention is that the yellow triangles that are along here, those are all the locations where the 14 15 sediment samples were collected that are going to be 16 used in this upcoming risk assessment that at least none 17 of the RAB that I know of feel that it's appropriate to 18 release in its draft form before all the data gap 19 investigation has been done.

Notice that the plume, that all of these samples are collected outside the plume and where the plume does not vent into the lake. About half of these samples were, are being collected where the Air Force investigation so far has shown that the plume is not present. In addition to that, a little explanation is



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probably necessary. This plume is in three dimensions. It's not only north/south/east/west, but it's also a vertical component. And the data that has been produced by the RI so far, shows that the bulk of the contamination exists about, I don't know, 25 feet below the water table.

And that the contamination that exists above that core of the plume is much less concentrated such that the top of the contamination is only about one percent, maybe even a tenth of a percent of the contamination levels that are found deeper within the aquifer.

13 A little more explanation about 14 groundwater/surface water interactions. When water 15 vents to a surface water, the top of the water table 16 vents right here at the shoreline. As the deeper 17 groundwater vents, it moves further out into the lake 18 and so where that, that high contamination is at about 19 25 feet below the water table, that's about the bottom 20 of the lake by the way. The lake's only about 25, you 21 know, feet deep. Those run about 15 to 30, I think.

And there's very few places where it's 30 feet deep. So it's venting at the very bottom of the lake but it's not happening here at the shoreline. It's happening somewhere out here. And so where these



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samples are collected right along the beach here,
 they're seeing the very top of the water table that has
 very little contamination in it to start with and they
 are ignoring the contamination that is venting out into
 the lake.

б Despite my proddings over the years, the Air 7 Force has refused to do core water sampling to actually 8 identify the area in the lake bottom where the 9 contamination is up flowing through the sediments 10 affecting all the plants that live there, all the 11 biology that's going on there. And I have to -- I found 12 this out yesterday, is that the, the plant samples that 13 are being collected by the Air Force for evaluation 14 during the risk assessment process were, were captured 15 or collected during these same time periods and they 16 were collected near shore where the sediment samples are 17 but that's not where the worst of the contamination is 18 vented.

19 It's 100, maybe even 1,000 times more 20 concentrated where it actually vents out here and it's 21 not difficult. Believe me, it is not difficult to go 22 out and do this type of an investigation and actually 23 identify where this plume vents into the lake.

Next slide, please. Going a little further tothe south, this is where the Ratliff Park treatment



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1	system is right here. There's pretty good coverage.
2	There were sediment samples collected along here. But
3	this plume right here is rather low concentration. And
4	I, I haven't taken a look at the, the vertical
5	distribution of the contamination there, but I'm
6	relatively confident that the worst of the contamination
7	in that plume is not venting at the shoreline. That's
8	just not the way it works.
9	MR. KYLE JONES: Mark, could I ask a question?
10	MR. MARK HENRY: By all means.
11	MR. KYLE JONES: That area where that plume is
12	and the sediment samples, which way does the groundwater
13	flow?
14	MR. MARK HENRY: Groundwater flows this way
15	towards the lake.
16	MR. KYLE JONES: It does? Okay. All right.
17	MR. MARK HENRY: Yes. All locations along Van
18	Etten Lake.
19	MR. KYLE JONES: All right.
20	MR. MARK HENRY: Next slide please. Now this
21	is south of the housing area. Au Sable River comes
22	through here, et cetera. You can see that none of these
23	samples with the exception of a few right here at Duell
24	Lake are actually collected where the Air Force has
25	determined that the plume is venting. Their, their



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contaminate plume, it ends, you know, somewhere along 1 2 here, somewhere along here, but it never makes it to the 3 river. They don't show that -- they have not done the 4 investigation to show and determine the extent of the 5 contamination moving towards the Au Sable River and so they do not know where that plume is venting. б

7 And it's just like anything else in the world. 8 If, if you're looking for a problem and that problem 9 exists here and you look over there, you're not going to find it. And so if all the data that you have is offset from where the problem is, then the only conclusions you 12 can draw from a risk assessment evaluating that data is 13 there's very little risk. You have to look for the 14 contamination, identify where it is venting, and then based on that information you go to those locations and you do the sediment sampling to see what that venting 17 plume has imparted to the sediments that could 18 potentially cause problems for benthic organisms.

19 Now, the benthic organisms are not being 20 evaluated during this RI at all. It is a pathway, an 21 ecological pathway that is completely being ignored in this risk assessment. Oh, benthic, organisms that live 22 23 in the sediments: The worms, the, the little midges and 24 whatnot that, that live down in that environment and 25 ultimately become part of the food chain for larger



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	MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING 114
1	organisms. Next slide, please.
2	MR. ARNIE LERICHE: Mark, could you highlight
3	the discharge for the Mission Street?
4	MR. MARK HENRY: Sure. Back up one, please.
5	The Mission Drive treatment system and, and that is
б	located about right up here.
7	MR. ARNIE LERICHE: Not for PFAS, though. It
8	was
9	MR. MARK HENRY: Well, it was originally
10	MR. ARNIE LERICHE: originally
11	MR. MARK HENRY: planned for chlorinated
12	solvents.
13	MR. ARNIE LERICHE: That's my point.
14	MR. MARK HENRY: And it was converted into a
15	PFAS treatment system
16	MR. ARNIE LERICHE: In 2018.
17	MR. MARK HENRY: in 2018. But the water
18	that was pumped from the extraction wells throughout the
19	housing area here, there's been a couple of attempts to
20	capture this, that contain PFAS, this groundwater plume
21	does, all that did was go through this treatment plant
22	that was designed for volatile chemicals and it just
23	sort of passed through that.
24	And so for whenever the Mission Drive came
25	online let me guess, it was probably around 1985.



1 MR. ARNIE LERICHE: '80. 2 MR. MARK HENRY: From '85 until it got, that 3 system got converted into a PFAS treatment system. So 4 for about 15, 20, 25 years all of that highly 5 contaminated PFAS was discharged to a storm sewer here and that went directly into the Au Sable River. And it б 7 was a known potential source area and yet the, the 8 sediment sampling was not collected there and I don't 9 know why. 10 As you can see we have -- and, oh, one other 11 thing to point out here. This is Three Pipes beach 12 where all the people from the housing area go and swim 13 all summer long and the discharge from Three Pipes 14 outlet is relatively high concentration. It's about, 15 about a half a part per billion, around 500 part per 16 trillion. But that discharge is right there at the 17 beach and yet the beach was not sampled for sediments to 18 determine their PFAS levels. That seemed rather strange 19 to me. Next slide please. 20

20 So this is the, the fire training area, area 21 and the, the wastewater treatment plant, the fire 22 training area up here. This area right here is where 23 the fire training area plume discharges directly over 24 land through seeps into the surface water there. Right 25 here is where the OT16 plume which originates right here



and comes down and discharges. The state has monitoring 1 2 wells there that have delineated that. And down here, 3 this is where the state found that there's a pond, what 4 I call pond 2. The Air Force is calling pond 3 right 5 now. But the, the state went through and did core water sampling here and found concentrations of PFAS coming б 7 right through the vent into the river at the whirlpool. 8 This is the whirlpool access site if you're familiar 9 with it.

10 But that whole bank along there was found to 11 have, to be seeping out into the Au Sable River over 12 1,000 parts per trillion of PFOS. But you can see that 13 the, the samples were collected over here and there is 14 no plume here that the Air Force identifies. They were 15 collected along here where core water sampling by the 16 state showed very low concentrations, like 16 parts per 17 trillion, and they were sampled over here. And they did 18 find some samples here or, or find PFAS in some samples 19 here. And my only explanation for that based upon where 20 it is, is somewhere around, it must have been about 21 2014, a couple years after I retired from the state, 22 this whole area got a facelift.

They took out all the natural beaver dams that were in there and they put in earthen dams in, water control structures. It was, it was disassembled and



reassembled into its current format. And this may actually represent some spoils left over from that construction project. But what I want to point out here is that most of the sediment samples that are going to be used in the risk assessment were collected in areas where the Air Force had not and still has not identified as contaminated areas.

And it is those samples that there is a risk associated with. The samples that don't contain PFAS, there's no risk there of PFAS. But in the areas that have been identified by the state, it is very clear that the Air Force is not duplicating the state's work and they did not use the state data to direct where sediment samples were going to be collected.

The sediment samples that are along the upper pond at Clark's Marsh, pond 1, there are really only two sediment sample -- actually, only one sediment sample that was collected here. This is a seep sample I think up to the north of there although -- not in the sediment. I'm sorry. So there's two sediment samples in this huge, highly contaminated venting groundwater.

And over here you've got, you know, a dozen samples in an area that contains almost no PFAS. So I along with -- I will join the chorus of RAB members who would urge you not to release the draft risk assessment



1	until the state and the, and the Air Force get together
2	and decide mutually on where samples should be collected
3	for the risk assessment. And I would raise that as an
4	action item. That's it. Thank you.
5	MR. STEVE WILLIS: Mark, could you send me
6	these slides?
7	MR. MARK HENRY: Yes; absolutely.
8	MR. STEVE WILLIS: Please? We'll, yeah, we'll
9	look at these as were planning the data gap
10	investigation.
11	MR. MARK HENRY: Is Paula here?
12	MR. KYLE JONES: She's, she's in the back.
13	MR. MARK HENRY: Oh. I think Paula might have
14	made a copy of these slides from yesterday, but I can
15	get you these.
16	MR. STEVE WILLIS: Okay.
17	MS. PAULA BOND: Yeah. I, I didn't make a copy
18	of them.
19	MR. MARK HENRY: Oh, you didn't?
20	MS. PAULA BOND: No.
21	MR. MARK HENRY: Okay. Then I will send you
22	what I prepared yesterday and also today.
23	MS. JESSIE HOWARD: Okay. At this time do we
24	have any questions from any RAB members? Arnie, I saw
25	you first.



MR. ARNIE LERICHE: Back about 2018 we were into the, the RAB had already started and the public was wondering and the RAB members were wondering who was watching out to see if the, the sampling is done according to the methods that are supposed to be or said to be done or just, you know, just to double check.

So we were educated on what the, how the, the Air Force works at closed sites with the states. And they actually give the state a certain amount of money which is pretty substantial. I think it's 800,000 a year is it or -- anyways, it's good. But the purpose is to split sample 10 percent of the Air Force samples.

13 So Mark asked the other day or a week ago, I 14 quess I'll just say, what do the splits show for the 15 sediment data and the answer was "we weren't there." 16 The state was not there. And so I asked Amy about that. 17 She said it was a scheduling problem. They were there. 18 The Air Force was late. And they were -- and the state 19 was by the schedule that was originally set sort of. 20 And the state had to, was committed to do other projects 21 at that moment.

So I asked, well, how about the rest of the 4,000 samples I think you said that -- or not you.

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MS. AMY HANDLEY: Not me.

MR. ARNIE LERICHE: Paula? Said the Air Force



has collected and she said, yeah, we have all that data.
So I ask as an AI, and she has already agreed to, to
pull that data together for us and hopefully, not
guarantee, before the November RAB so that we will have
the, the state show what they -- were there to witness
the sampling in most cases, almost all cases, and the
analyses that they independently give.

8 So I want to give the state credit for that. 9 But also the knowledge that there is some double 10 checking going on. It's not just whatever the Air Force 11 wants to do. Thank you, Amy.

12

MS. JESSIE HOWARD: Thank you. Dave?

13 MR. DAVE CARMONA: Dave Carmona, Community RAB. 14 Amy, we really need you to be a strong advocate for us 15 at these BCT meetings in light of the suggestions that 16 we've made here since we don't get a seat at the table 17 for those and a lot of the work planning is done 18 associated with you. So anything you can do to get our 19 suggestions through the BCT and into the work plans we 20 really, really appreciate.

MS. AMY HANDLEY: I, I just, I just want to follow up with that. So for the BCT meetings, it's more like a, an update sharing time and then usually it's a presentation given on status of something. Like Steve mentioned, talked about the VOC sites that are going to



1	be updated. So while there may be opportunities to
2	bring up some of these concerns in relation to whatever
3	topic we're, we're talking about at BCT, it's not so
4	much that we're doing the planning of things in those
5	BCT. So I just want to be clear about what the, the
6	purpose of those would be.
7	MR. DAVE CARMONA: Okay. At what point do you
8	advocate for us when you're working with the Air Force
9	on work plan reviews?
10	MS. AMY HANDLEY: So that would be during
11	separate project planning meetings.
12	MR. DAVE CARMONA: Okay.
13	MS. AMY HANDLEY: Like our SPP meetings and
14	things like that. So they're, they're different
15	meetings that occur. So I just want to make clear that
16	BCT's aren't like our only planning period.
17	MR. DAVE CARMONA: Okay.
18	MR. KALAN BRIGGS: And the report is and the
19	report is where you give counts. Report document
20	reviews.
21	MS. AMY HANDLEY: Oh, thank you.
22	MR. DAVE CARMONA: Thank you, Amy. Steve, did
23	you ever get your administrative help? We're a year
24	into this issue.
25	MR. STEVE WILLIS: I understand that it's

1 coming. 2 MR. DAVE CARMONA: And for a year it's been 3 coming. Greg, is there anything you can do to push OPM 4 or HR to get that? 5 MR. STEVE WILLIS: Identify --6 MR. GREG GANGNUSS: Now we're, we're getting --

7 well, we're getting folks to, to apply. I don't want to 8 scare them off. But, you know (inaudible) it's, it's 9 tough to find a good qualified. If you know anybody, 10 send them our way. I'm serious. You know, if you know 11 somebody who's got a good background, we got talk with 12 them. They got to work out of San Antonio.

13MR. STEVE WILLIS: Yeah, that's something to14move.

15 MR. GREG GANGNUSS: But I'm telling you right 16 now, you give me a good qualified applicant, okay, you 17 can call (inaudible), we'll work with that person. I'm, 18 I'm serious. But we are working with Steve and trying 19 to get somebody to work, maybe even two folks. So 20 whatever help, I'm serious, (inaudible) if you know 21 someone with a good background, engineering or science, 22 any experience in the cleanup, send them my way.

23 MR. ROGER WALTON: Roger Walton with the Air 24 Force. So I -- we, we redid the recruitment 25 announcement. It went out two weeks ago, well, it was



1	last Friday. We have a set of resumes that just came in
2	that I'm reviewing and our intent and right now there
3	are some prospects in there which the first go around
4	that we did this we got over 60 applicants but we did
5	not get qualified candidates and that, that, that was
6	disappointing in, in the first one.
7	So, so there is some prospects in this. No
8	guarantees that they'll accept the job, but we're,
9	we're, we're moving forward with the, with the hiring
LO	action starting this week.
L1	MR. DAVE CARMONA: Thank you.
L2	MR. GREG GANGNUSS: And we'll get a person
L3	(inaudible) but until (inaudible) that's what we need
L4	out here.
L5	MR. DAVE CARMONA: The other thing I notice on
L6	several of the slides presented by Paula, who writes the
L7	appropriation request for this project?
L8	MR. STEVE WILLIS: They start with me.
L9	MR. DAVE CARMONA: Okay. All right. Thank
20	you. And this one's for Paula. You made a statement no
21	new data gathered since the May RAB. Could you clarify?
22	Was that for the RI or the risk assessment?
23	MS. PAULA BOND: That's for the RI and the risk
24	assessment. We've collected all of the field data up to
25	this point that we're going to.



MR. DAVE CARMONA: Okay. Why -- and I 1 2 understand that. Why would you stop gathering any data 3 where you have points of data available to you to 4 support or to monitor what's happening along the way as 5 you go? Add to your data set? Now you got a 6 three-month blank.

7 MS. PAULA BOND: Yeah. I'm not sure I 8 understand the question, Dave. We are -- so we've collected all the data that we had to support the RI report that we're, that we're doing. So we finished all that work out and then this contract is, is coming to an 12 end. So we finished our field work. The transducers 13 are the last bit of data that we're going to collect to 14 roll into the RI report. So, and the next phase is the, the data gap that Steve was talking about.

MR. DAVE CARMONA: Okay. So basically what you're saying is we're a year away from any other data being gathered because it's not going to be until January that you had that contract and then you got 30-day period of finding that contractor. So we're going to basically go almost three-quarters of the year with no new data being gathered at any point?

23 MS. PAULA BOND: Yeah. I think Steve said the 24 summer of '25 is when the data coll- -- data gap --25 collection of the data gap they begin, summer of '25.



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MR. DAVE CARMONA: So rather than letting scientific methodology guide you, contractual obligations are guiding you basically since the contract runs out?

MS. PAULA BOND: Well, we, we finished the scope of work for the RI up to this point. So that's, we've collected all the data that was in the, the QAPP that we were going to collect. We've done that up to this point.

10 I understand that. MR. DAVE CARMONA: So what 11 happens in that interim? What if something happens in 12 there that should have been monitored, data should have 13 been captured? And I quess maybe this is more for 14 AFCEC. Why this (inaudible) in the process? It would seem to me that we would have continuous data collection 15 if we have it available. That there should be something 16 17 there to -- can you gather that information to support 18 or build down the line for what you intend to do as you 19 move towards the ROD?

This is a new process to me. I've never seen anything like this. The biggest project I was involved in was the O'Hare monitorization project. We didn't stop. We gathered data, continued to plan all the way through towards the end and gather information. The contract covered that for gathering water, fowl



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1 information, biota information, all of that. Why 2 wouldn't this do the same thing since this is 3 particularly environmentally sensitive? It's a question 4 that I'm asking you guys because you're the experts on 5 the contracts and how the process works.

6 MR. GREG GANGNUSS: It's -- you've got it, 7 Steve.

8 MR. STEVE WILLIS: Yeah. I, I would say that 9 when we started this process we had no idea that it was 10 going to be this big. And so we've, we've expanded the 11 contract several times but we are at our limits so we 12 are moving on to the continue collecting data in the 13 next phase.

MR. DAVE CARMONA: Thus my question about the appropriations. And I know you make them and I know they have to be approved at other levels as they work up through the system. Are we getting the appropriate amount of money for the size issue that we have here? Because this is tremendous.

20 MR. STEVE WILLIS: Yes. For this year I've 21 gotten all the money I've asked for.

22 MR. GREG GANGNUSS: Yeah, you know, and, and, 23 and the fiscal, I mean, the funding, we -- Wurtsmith is 24 well funded. We, we've funded all requirements at 25 Wurtsmith. We've never entered into a situation where



we couldn't do something because of funding. So let's leave it at that. I really hate to have a (inaudible). My commitment to Wurtsmith is to keep the, the valid requirements funded, you know, and up to date. I think historically we've shown that. Not just talked the walk, we've walked it.

7 We have seven Ras. We have an eighth one going 8 in right now. You know, we're going to have those two 9 Ras contract by the end of the year. So I think we can 10 move past the money and the contracting. You know, 11 we're fully committed. And I know, Dave, you're going 12 to be talking about anger or walking out. We're not going to -- you know, we're doing the 30 year plan. But 13 14 fiscally out so we know we have a longer commitment here 15 at Wurtsmith. Plan to be here long term.

You know, this, we'll work together team, as a team. And, I mean, I know there's going to be issues that we're, we're talking about it now. These take time. But, you know, my commitment is to ensure that, that we are continuing to (inaudible) appropriate requirements at Wurtsmith.

22 MR. DAVE CARMONA: Okay. Thank you. One of 23 the other questions that I have and this comes from the 24 recently, the Ratliff project coming online. And during 25 the design phase since we're not overly involved in



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1 that, has horizontal boring been looked at as a source 2 of gathering groundwater to process? The reason I ask 3 that is I think a majority of the Community RAB think 4 that those wells are too far apart and you're not 5 creating enough negative hydraulic pressure to draw into your wells sufficiently to stop the entire flow going б 7 into the lake. So as we design projects down the line 8 and the technology is there and available, has it been 9 considered as a possibility to capture more of the 10 Toss it, 50 points. plumes?

MR. STEVE WILLIS: I, I don't believe horizontal drilling was looked at for any of the previous, but as you all saw, that was one of the recommendations for the CPA team for the wastewater treatment plant and Clark's Marsh is to put in horizontal, the HRX wells. So that's something we will look at.

MR. DAVE CARMONA: I, I, I would really like to see, to see it worked in if possible for DRMO and landfill. I think that may serve to benefit reducing that rapid flow to the lake since the incline is so steep there. So thank you.

MS. JESSIE HOWARD: Do we have any otherquestions from the RAB? Yes, sir.

MR. BILL GAINES: Back to the beginning. You



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told us what aesthetic criteria was for volatile organic 1 2 compounds. You didn't define what the health-based 3 criteria would be and something that I find missing is 4 what about the environmental impact criteria? 5 MR. STEVE WILLIS: So all the numbers that I've б talked about are all EGLE promulgated numbers. Health 7 based criteria is based on impacts to human health and I 8 don't know -- I don't think EGLE has eco --9 MR. KALAN BRIGGS: No, we (inaudible) less 10 conservative than a human health (inaudible). MR. BILL GAINES: I mean, what are the human 11 12 health values? I --13 MR. KALAN BRIGGS: I don't know what you're --14 MR. STEVE WILLIS: It would, it would depend on 15 the compound and I don't know any of the numbers off the 16 top of my head. 17 MR. BILL GAINES: Well, you said you changed 18 the, the criteria. What did you change it to? 19 MR. STEVE WILLIS: We have not changed it. We 20 are going to propose changing it to EGLE and --21 MR. BILL GAINES: Oh, okay. 22 MR. STEVE WILLIS: -- numerically I don't know 23 what those values are. 24 MR. BILL GAINES: Okay. All right. I, I 25 misunderstood that part.



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MR. STEVE WILLIS: Yeah. No, we have not 1 2 changed anything yet. 3 MR. BILL GAINES: Okav. 4 MS. JESSIE HOWARD: Any other questions from 5 the RAB? Kyle? б MR. KYLE JONES: Kyle, excuse me, Kyle Jones 7 with the RAB. Yesterday, Steve, we spoke about after 8 Mark made his presentation at the tech meeting yesterday 9 that he just made here again pointing out the really 10 terrifically high number of sediment samples that were 11 taken not where the plumes are venting into surface 12 water and the question was asked who chose those 13 locations? And I think I heard you say that it was the 14 risk assessment firm that chose those locations? 15 MR. STEVE WILLIS: I think, I think Paula said 16 That was all actually done before I started. that. So 17 I was not involved in that process. 18 MR. KYLE JONES: Are you saying that the 19 sediment sample locations were chosen -- how long you 20 been with, on the project? 21 MR. STEVE WILLIS: This part about two and a 22 half years. So they, they were selected in the work 23 plan based on the available data at that time is my 24 understanding. 25 MR. KYLE JONES: All right. That flabbergasts



me even more. But I, I, I would find it very, very --1 2 in my experience, when a risk assessment is going to be 3 done, you hire a risk assessment specialty firm that 4 does risk assessments. That's what they do. But they 5 rely on the environmental consultant's data. They don't б go out and take all the samples in the wells. They 7 don't take the samples in the, in the surface water, 8 they don't take the soil samples and they don't select 9 where to have any of those samples taken.

10 So I find it very unusual that for, for you 11 guys to say -- and if you don't know, Steve, can you 12 find out or Paula? Are you saying for sure that GSI did 13 this?

MS. PAULA BOND: Everybody on the team was involved -- I didn't explain that. Sorry. Was involved in identifying the single locations. GSI's sensors were involved in that decision making process, so were all the technical team that provided the information. The Air Force reviewed everything, reviewed the sample locations. And that's kind of how the process works.

The technical team puts together a plan, we provide that plan to the Air Force, the Air Force reviews it, then it goes to EGLE, EGLE reviews it. So everybody has input into all the sample locations, everything that's been done out here.



MR. KYLE JONES: So --

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2 MS. PAULA BOND: So, yes, the risk assessors 3 were involved.

MR. KYLE JONES: Okay. But I heard Steve say that the samples were or, sorry, the locations for the sediment samples were identified two and a half years ago or, or perhaps further back.

8 MS. PAULA BOND: So when, yeah, when we wrote 9 the original UFP QAPP, all of the sample locations were 10 based on the data that we had in that time which was 11 data that was collected during site inspection by the 12 Air Force, data that had been collected by EGLE 13 previously. We had that data to look at. That's what 14 we had to look at when those initial locations were 15 selected.

16 MR. KYLE JONES: Did, did it not -- okay. I'm 17 sorry.

MS. PAULA BOND: I was going to say as we looked at the data, as we started collecting data, that was one of the reasons that we waited until later in the process to actually do surface water and sediment. So the locations that you were showing on the figures there's other inputs that went into those locations.

For example, if you look at the surface water features that are running through Clark's Marsh coming



from pond 1, coming from behind the wastewater treatment 1 2 plant, all of those surface water discharges also 3 discharge in some of those exposure units that were 4 developed for sediment. And that was another rationale 5 why those locations were selected there. They have co-located the surface water with the sediment. So it's б 7 not just the groundwater plumes, it was also surface 8 water discharging to the river why those locations were selected where they were selected. 9

And one of the other points I'd like to make based on Mark's presentation, where some of those -kilometer long exposure unit for most of those. The individual water bodies, the ponds, they were, they're evaluated as individual water bodies. The other ones are one kilometer long exposure units.

16 When we're looking at risk, we don't just 17 sample the highest locations. We sample a cross section 18 of everything because exposure doesn't occur only at one 19 spot. Exposure occurs, could be anywhere along the 20 river. So you can't just select one spot to collect 21 samples from. So a lot of those exposure units have parts of both within that, that kilometer long exposure 22 23 unit.

24 Some where we do know we have higher 25 concentrations where plumes are discharging and some



just on the edge. Because we're looking not at one single spot, but we're looking at a cross section across the area, the exposure unit. So I want to make sure that that is understood, too. So hopefully that answers some of your questions.

б MR. KYLE JONES: Well, it, it is a -- I 7 appreciate that explanation. But the, the I don't know 8 the percentage but I got to believe that virtually all 9 of the PFAS that's getting into the environment is 10 getting there through groundwater migration. If there's 11 some surface water, you know, movement that gets into 12 the certain sediments on the base, I'm glad you guys are 13 testing there.

14 That's terrific. But it looks for all the 15 world that we, we -- you mentioned yesterday, "well, 16 that's only the PFOS plume map." The PFOA is, well, we 17 checked it out and at least appears this point it does 18 that same split and yet that entire, that area that you 19 collected samples where the plume does not vent to the 20 lake.

MS. PAULA BOND: That, the figure that Mark was showing was missing a couple of surface water at sample locations. That on the north side at Pierce's Point. So those were on the other side where the plume shows as it's discharging. So those are on the posters back



1 there that you guys can look at. So that, that is also 2 the one point I'd like to make is it was missing some of 3 those --

MR. KYLE JONES: So back to the process, though. And I, honestly I just want to understand the process. If you're identifying sediment collection locations two and a half years before you do them and any environmental consultant at all would know that conditions change, plume shapes are, are, are evolved and are different.

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MS. PAULA BOND: Uh-huh.

MR. KYLE JONES: Did it not, was it not part of the process to re-check those?

MS. PAULA BOND: It was. That's what I said. That's why we waited until last fall of 2023 to do the surface water sediment sampling because we were using all the data that we had collected through the RI process and that's where those locations were selected.

MR. KYLE JONES: Well, you know, I guess, I, I mean, you know, it's hard to understand why it's so many of those, especially along the river, where the plume is not entering, you know, at all. And so if you're going to --

24 MS. PAULA BOND: I wouldn't say the plume is 25 not entering at all.



#### August 21, 2024 MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING 136 MR. KYLE JONES: Well, where those locations 1 2 are. 3 MS. PAULA BOND: We don't have the data too. 4 That's why it's not drawn --5 MR. KYLE JONES: Yes. б MS. PAULA BOND: -- to show that. 7 MR. KYLE JONES: Right. 8 MS. PAULA BOND: We don't know that it's not. 9 And I would also point out that some of the earlier work 10 that was done by others show the plume, all the plumes 11 going down to the river. We're going to collect that 12 data in the data gap to support that. And like Steve 13 said, if we look at that data, if there's additional 14 sediment samples that need to be collected, then they'll 15 be collected as part of the data gap. 16 MR. KYLE JONES: So -- oh, Mark, you got a 17 comment? 18 MR. MARK HENRY: Yeah, just a comment to that 19 point. I highly recommend that you find the plumes. 20 Use core water sampling to identify the reaches of the 21 river where the plumes are discharging and use that as 22 your guide for collecting your samples. Don't just 23 throw darts on the, on the map and generate a, a 24 kilometer long section of the river. It's -- I think 25 it's inappropriate to be sampling --



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MS. PAULA BOND: Well, it wasn't darts, but, 1 2 okay.

MR. STEVE WILLIS: Just let me just piggyback that based on Mark's figures and some of the points brought up yesterday I did, did acknowledge that there's some data gaps and we, we, we will collect -- already committed. We will collect more sediment samples.

8 MR. KYLE JONES: So in, in my view that's 9 terrific and we appreciate that. But this gets back to the conversation earlier in this meeting about the appropriateness of publishing the risk assessment when 12 all the data have not been collected and in this case 13 they've been collected at places where arguably there 14 should be no contamination found in the first place.

If the idea is to publish a risk assessment 15 16 with incomplete information and arguably wrong 17 information, then, then, you know, that, that changes 18 the, in my view, changes the status of a risk assessment 19 to being one that would be giving false information. 20 Whether good or bad, it's not reflective of the actual 21 site and it's not -- it can't be reflective of the 22 actual site. Why? Because you haven't collected the 23 data gap groundwater samples.

24 You haven't -- you -- you're going to collect 25 more sediment samples in places where you actually have



identified where the plume is. You haven't collected and, and have only sort of mildly suggested that you might use the state's data for foam. These are all very, very heavy contributors to a risk assessment. So I, I, this is now the third, the third part or way of having receptors get exposed to the contamination where we don't have all the information.

And it seems to me that it's like you're cooking the books. You don't want to have a -- I don't know why you would ever publish a, a, a report with such incomplete and arguably wrong information. So I don't, I mean, it's pretty much industry standard to do it that way. Get the information, then do the risk assessment. Paula says, "well, we have the data for the risk assessment."

Well, you have data and we've all pointed out and I think Steve in a couple of cases yesterday has acknowledged that some additional work is necessary. If you publish a risk assessment now, you're publishing a risk assessment that will give a false and pretty much useless conclusion. It's just no point in it. Amy, I have a question for you in this regard.

Did EGLE, either the Water Division or RD take a look at the locations of these sediment samples and give a, you know, the, the Good Housekeeping Seal of



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1 Approval?

2 MS. AMY HANDLEY: Yes. So as Paul mentioned we 3 do get to see these locations before they go out and 4 take them. So we do get an opportunity to, you know, decide whether or not they need to be moving them or 5 б not. But we did agree with them on the locations they 7 picked. But I will say during the data gap 8 investigation we are making recommendations to go out 9 and do additional sediment sampling.

As Steve indicated, they're willing to do that. And we have a plan of what we want to see them do and additional areas, further investigation for that. So it -- we hear the concern from you guys that additional sediment needs to be considered and, and we're going to be pushing for that as well, so --

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MR. KYLE JONES: Okay. That --

MR. MARK HENRY: Not just additional sediments. Please identify where the plumes are venting to the surface water. That should be an integral component of the RI. It is a recognized pathway that has been ignored here.

MS. AMY HANDLEY: Understood. Thanks, Mark.

23 MR. KYLE JONES: The, the, the other, the other 24 issue is, is this point that Mark made earlier about the 25 fact that it's been observed that the highest or higher



concentrations of PFAS in the vertical column of the 1 2 aquifer are not at the surface. And everybody can 3 imagine that a lake is built like a bowl, a pasta bowl, 4 it's kind of flat and it, but it curves. And so if the 5 shoreline is here and the highest point in the, the, the vertical column of the aquifer is there, but the highest б 7 concentrations are down here, that bowl has started to 8 curve and you need to go in -- as Mark explained on the 9 map -- you need to go into the lake to get those values.

10 And so I would say, Amy, and Steve and Paula, 11 please account for this hydrogeologic fact when you're 12 doing this data gap filling.

13 MR. STEVE WILLIS: Yeah, I've got a note, note14 to look into that, Mark.

15 MS. JESSIE HOWARD: We are running a little bit 16 behind at this point so I do want to move on to the 17 public comment portion. Real quickly I'm just going to 18 qo over these quidelines. Please raise your hand to 19 indicate you'd like to make a comment. Somebody from my 20 team will bring you a microphone to your seat. When you 21 have that microphone, please say and spell your name for 22 the record.

Number three, please keep your comment to three
minutes or less. And number four, remember that your
comment will be addressed later if the RAB members



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determine that a follow up is going to be needed. I see
 a couple hands.

#### TONY SPANIOLA

MR. TONY SPANIOLA: Thank you. My name is Tony Spaniola, S-p-a-n-i-o-l-a. I am with DNR Water and the Great Lakes PFAS Section Network and I have a place on Van Etten Lake. First off to address kind of a narrower issue. There was a reference to an independent review of the Alert Aircraft Area. Disappointed that the actual independent review report is not being provided.

If I came to you and said I was going to have an independent review done and then said to you, "but I'm not going to give you the independent review report, I'm going to give you my own interpretation of it," I don't think you would be very receptive to what I had to say and would be wondering why I didn't give you the actual independent review report.

18 And so the request that I have made repeated --19 I asked to look at the independent review and I am very 20 disappointed that the request so far for that actual 21 independent review report have been turned down and I 22 think that we need to see it. Secondly, from a bigger 23 picture perspective, as I sit here and listen and I've 24 been in these meetings from back in 2017 and I remember, but it, it, it's very apparent from the comments here 25



1 tonight and from the work that has been done by the 2 experts within the community who have extensive 3 experience in this, in these matters, that there are 4 fundamental flaws in the methodology and the science 5 that have been used to do the risk assessment and the 6 remedial investigation work plan.

7 That casts serious doubt on the entire plans in 8 both regards. And what that tells me is we're not 9 talking data gaps. We're talking gaping holes, 10 fundamental problems, time has been wasted, money has 11 been wasted. The foam is not a new thing here in 12 There was an Oscoda. We didn't just find that. 13 assessment done, a detailed assessment done five years 14 ago and it was ignored by the Air Force. Plain and 15 simple.

16 The entire east side of Van Etten Lake has been 17 ignored by the Air Force for all these years. Plain and 18 simple. And, and the Air Force would have us believe 19 that somehow, perhaps aliens from another planet came in 20 and dumped PFAS on the east side of Van Etten Lake. And 21 don't tell me it's from the septic systems. If that 22 were the case, every septic system in the country would 23 have this kind of contamination all up and down Van 24 Etten Lake and that's not what's happening.

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And so if the type of independent review that



should have been done in the Alert Aircraft Area because the comments that were made by the community experts here were ignored on the Alert Aircraft Area needs to be done with regard to the entire process here. And I'm going to be straight with you. When you do things right, we'll tell you you're doing things right. When you're not, we're going to tell you that.

8 Because we have to live with the decisions 9 here. And I want to end by saying that I'm hearing all 10 these things about the IRAs and I was one of the biggest 11 champions. I've been championing doing it from remedies 12 as a really good strategic way to attack problems and 13 now I hear tonight that the four interim remedies that 14 we're talking about that the community developed by the 15 way, that the members of Congress helped us to get 16 through, didn't come up out of the goodness of the Air 17 Force's heart, I'm now hearing tonight that those aren't 18 even going to be interim remedies.

19 And so if, if there's questions as to why this 20 community is upset, look in the mirror and listen to 21 what we're saying here tonight. This isn't the CERCLA 22 process. CERCLA does not mandate mismanagement. Ιt 23 does not mandate ignoring data, it does not mandate 24 taking substandard actions and that's what's been going 25 on here. Thank you.


### August 21, 2024 MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING

MS. JESSIE HOWARD: Thank you, Tony. BOB DELANY.

3 MR. BOB DELANY: Hi. Bob Delanev. That's 4 B-o-b D-e-l-a-n-y. I had just a, a tech, well, 5 question. A little two-part question. First of all, what were the criteria that was set for this? What were б 7 the, what was the basis of the criteria for the soil 8 screening and for the sediment screening? We had a 9 cutoff for each -- a number for each of the soil samples 10 and the sediment samples as to what was considered above 11 the screening and what was below.

12 What was the basis? And I think four different 13 possibilities: Direct contact for humans; uptake and 14 biota such as vegetation and animals, benthic organisms, 15 for instance; protection of drinking water or protection 16 of surface water. So those are basically the four 17 different types of things you're screening for. And the 18 reason that is a important question is a multiple goal.

19 But the first thing is, is that if you look at 20 the plume maps on page 21 of the Air Force's 21 presentation and you look at the soil samples on page 22 26, you'll see that there are plumes without a, a, a 23 source. And if you take the sources away, the soils 24 that were above the screening figure, then you have 25 other plumes that are coming from areas that have no



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## MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING

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soil samples above, above the screening numbers but they
 aren't coming from areas that are below the screening
 numbers.

So if the soils, and certainly in Part 201 you have to look at the soils as a source to, to groundwater and eventually surface water. So that would be one, one concern is that the screening levels aren't appropriate for the characterization of, of sources.

The other thing is with sediments. Sediments 9 10 are -- there's, there's two potential concerns. There's 11 the concern of direct contact to humans and biota, but 12 the other concern is as a sink of contamination. The 13 surface water is similar to soils being a, a, a source 14 to groundwater, sediments that have concentrated, the contamination will continue to be a sink. And so, 15 16 again, if your numbers are based on direct contact or 17 something like that, it may be failing to represent the 18 actual risk for the food chain eventually getting to 19 humans, humans through fish or other things that they're 20 eating from the water. So, anyway, those are my two 21 questions or observations.

MS. JESSIE HOWARD: Thank you, Bob. Did we
have anybody else in the room that have a comment?
Wendi? In the front there.

KELLY LIVELY



## MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING

MS. KELLY LIVELY: Hi. Kelly Lively, 1 2 L-i-v-e-l-y. I'm just curious about the independent 3 report as well. I know that we are curious to see that 4 and have asked and just like the community, would like 5 to -- would like that to be released in its entirety. б MS. JESSIE HOWARD: Thank you, Kelly. Amy, do 7 we have anybody virtual with a comment? 8 MS. AMY RAUSER: No. 9 MS. JESSIE HOWARD: No? Okay. Anybody else 10 with us in the room that has a comment? Okay. I will 11 hand it over to the co-chairs for their closing remarks. 12 (Closing remarks at 8:32 p.m.) 13 MR. STEVE WILLIS: Thanks, everyone, for 14 coming. We still got plenty of work to do. We are, we 15 are by no means done, done with this investigation and 16 work here at Wurtsmith. We hear your concerns and we'll 17 definitely look into them and do everything we can to 18 address them. So -- Mark? 19 MR. MARK HENRY: I'd like to thank everybody who attended virtually or in person. I urge you to come 20 21 to future meetings and tell all your friends. We could 22 use more public participation in these meetings. And 23 thanks to all the RAB members who made it here tonight. 24 MS. JESSIE HOWARD: Thank you very much.

25 Everybody have a lovely evening.



## August 21, 2024 MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING (Proceeding concluded at 8:32 p.m.)



### MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING

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3	I, Marcy A. Klingshirn, a Certified Electronic
4	Recorder and Notary Public within and for the State of
5	Michigan, do hereby certify:
6	That this transcript, consisting of 147 pages,
7	is a complete, true, and correct record given in this
8	case on August 21, 2024.
9	I further certify that I am not related to any
10	of the parties to this action by blood or marriage; and
11	that I am not interested in the outcome of this matter,
12	financial or otherwise.
13	IN WITNESS THEREOF, I have hereunto set my hand
14	this 28th day of August, 2024.
15	
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18	
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20	
21	ma a verashina
22	III and a receipt a
23	Marcy A. Klingshirn, CER 6924
2.4	Notary Public, State of Michigan County of Eaton
25	My commission expires: March 30, 2029
40	
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MEETING WURTSMITH RI	ESTORATION /	ADVISORY BOARD	MEETING	August 21, 2024 Index: 149
	14	2,000	5:4 16:12	323.1057
1	78:14	59:9	23	75:18
	15	2.9	55:14	34
1	14:1,7	52:3	25	100:13,15
54:5,21	55:9	20	<b>45</b>	2400
55:10,13	61:20	<b>20</b>	110.5,19,	5400
117:16	70:24	91·21 115·4	20 115·4 104·04 05	54.9
133:1	78:14	115.4	124.24,25	35
1 000	110:21	2002	26	48:7
16.0	115:4	24:3	144:22	37
10.2	15 0	201	26+h	48:8
60:18	15.8	1/5./	12.16	40.0
61:25	53:23	140.4	57.2	39
62:5	16	2014	57.2	52:4
111:19	116:16	26:18	27	חצ
116:12	170	116:21	58 <b>:</b> 3	15:17
10		2017	75 <b>:</b> 13	49.20
14:1,7	54.14	73.9 03.1	28	58.15
119:12	1700	1/1.0/	101.24	50.12
100	53:14	111.21	101.24	
100	190	2018	287	4
10:1	27.2	114:16,17	52:14	
111:19	57•2	119:1	29th	4
12	18th	2023	12:2	51:6 11
34:4 54:2	48:3	135:15	10 0	51.0,11
75:14,15	19	100 10		4,000
76:2,8	53:17	2024	3	66:3
78:22	00 1/	5:2,4		93:10
79:3 80:4	1967	36:25	3	119:23
81:18	62:21	108:24	54:5	4.2
93:11	1985	2025	116:4	51:20
97:24	114:25	16:11		
121 000	1000	35:1	30	4.3
51:14	1993	102:24	55:3	51:5
51.14	83:23	103:4	59:19	40
125	19th		110:21,22	36:2
37:3	14:24	2028	127:13	400
12th	16:11	105:12,14	30-day	400
48:1		20th	99:22	20.0
		14:23	100:8	41
13	2	16:10,12	124:20	29:7
53:4		21	20/21	43
13.2	2	<b>21</b> E·0 0E·16	102022	37:20
53:19	54:5	5·2 95·10 144·20	102.23	57.20
1.0.0	55:10	144·20	31	49
T30	116:4	21st	98:21	37:3
53:21				



### MEETING

WURTSMITH RESTORATION ADVISORY BOARD MEETING Index: 496..additional

August	21,	2024
--------	-----	------

496	6169		140:11	108:4
55:12	94:25	9	accounted	137:20,22
	621		77:8.11	141:10,
5	54:25	90	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	17,20
	01 20	23:16	accurate	145:18
	699	20 20	40:13	adaptabilit
5	37:9	94	42:13	v
95 <b>:</b> 15	6:00	94:25	acknowledge	37:12
50	48:3,17	95	82:19,20	57*12
61:25	,	94:19	137:5	add
128:10		95:10		10:23
	7	20 10	acknowledge	21:4
500			d	30:13,24
16:2	7	A	138:18	34:1
115:15	34:23		ackward	45:14
5067	51-25	abandoned	107:23	49:15
37:21	71	95:7		73:24
57.21	94:25	53.1	acres	84:20
5091	7•38	ABC	36:2	124:5
53:8	108:13	80:25	action	
5092	100.12	abgoluto	21.1 6	added
5092			34.1,0	34:6
53.9	8	105:5	45.10	45:16
55		absolutely	4/:22,23,	addendum
83:20,25	0	118:7	24 48:1,7	17:5.7.
	<b>0</b>	- h h- i	56:5 72:4	16.17
5/	52:11	absorbing	79:2	63:16
81:18	8-12-2024	22:1 76:6	118:4	65.23
5:01:09	37:8	abundance	123:10	60.22
5:2		41:13	actions	09.22
	80		17:25	13.2
5:05	115:1	accept	46:8	addendums
9:14	800,000	82:1,2,17	50:20	87:24
5:59	119:10	93:6	99:20	addina
47:19		123:8	143.24	12.17
	800-pound	accepted	140.24	
	69:5 70:2	73:23	activities	65.5
6	828	74:3	31:8	addition
	37:8	80:13	33:21	38:10
6		81:18	38:9	109:25
51:23	85	01.10	55:19	
52:11	115:2	access	56:12	additional
<u> </u>	8:32	10:1,17	99 <b>:</b> 4	13:18
60	146:12	12:21		15:15
23:16,18,	147:1	116:8	actual	16:21
19 123:4	± ± / · ±	200005	28:14	17:14
600			60:7 99:9	20:19
26.0		//•⊥4	106:18	21:1
20.9				



MEETING WURTSMITH RE	ESTORATION AD	VISORY BOARD	MEETINGndex:	August 21, 2024 Additionallyalign
26:21	adults	AG's	17:19	132:12
27:20	37:9	32:4	19:19	142:14,
28:2	<b>.</b> .		20:5,12	17,18
33:18	advantageou	age	25:13	143:16
48:22	S	79:15	26:10	144:20
49:4	79:13	95:15	31:24	
63:10.15.	Advisory	agenda	32:2.6.	Aircraft
23 64:4	5:4	7:23	15.18	8:1
66:10.16			34:16	12:11,23
67:24	advocacy	aggregated	37:7.18.	32:14
82:24	46:7,16	19:17	23 39:1	46 <b>:</b> 25
85:24	advocate	agree	40:1 10	48:15
03·24 98·14	120:14	13:16	40.1,10	56:5 98:8
101.2	121:8	63:21	42.23	99:11
101.3	-	106:3.4	45.17	107:18
100.10	Aerospace	139:6	40.2 49.0	108:5
100.12	36:6	207 0		109:10
136:13	Aerostar	agreed	70:1,3,4 71:10	141:9
138:18	48:15	43:16,23	71:19	143:1,3
139:9,12,		120:2	73:11	•
13,17	aesthetic	agreement	75:22	airpianes
Additionall	24:7,12,	43:21	81:17	35:14
У	16 25:1	13.21	82:13	airport
37:5	27:24	ahead	83:14,15	10:20
	129:1	5:23	84:6,23	35:9,10,
address	aesthetic-	11:10	85:15	12,25
22:17	based	18:5	86:23	36:4,7
48:14	25:6	19:14	87:17	<b>31</b> t
141:7	20 0	25:11	88:11	Alert
146:18	AFCEC	57:11,14	89:10,17	8:1
addressed	125:14	63:13	92:1,5,7,	12:11,23
13:21	Affairs	67:6	10 93:6,7	32:13
14:11	12:1	68:19	94:22	46:25
140:25	31:15	ъ <b>т</b>	104:4	48:15
110 10	51.15	AL 10.7	106:25	56:5
adjudicated	affected	18.7	107:11	84:15
43:3	84:7	21:24	109:23	98:8
admin	affecting	84:20	111:6,13	99:11
10:12 14	111.10	120:2	112:24	107:17
57:5	111.10	aid	116:4,14	108:5
57.5	AFFF	108:16	117:6,12	109:10
administrat	54:4,9,		118:1	141:9
ive	15,19,21	air	119:8,12,	143:1,3
10:23	55:1,4,11	6:7 8:5,	18,25	aliong
25:17	83:7	9,12 9:17	120:10	attens 140.10
121:23	<b></b>	10:10	121:8	142.19
adoleggonta	arternoon	11:18	122:23	align
27.10	32.22	13:1,7	131:10 22	17:1
J J V T U				



MEETING WURTSMITH RESTORATION ADVISORY BOARD MEETING

August 21, 2024

	STORATION AL	VISURT DUARL		Lex. Allenarguing
Allen	analyses	answers	appropriate	56:5 58:5
54:12	120:7	44:25	ness	59:4
Allogato	analwaia	134:4	137:11	60:23
12.12	26.11	Antonio	appropriati	61:14
42.12	20.11	122.12		74:18
Allonnia	37•⊥9 76•01	122.12	102.17	75:1
23:1	70·21 02·10	apparent	123.17	88:8,9,22
allowing	84.22	141:25	appropriati	93:15
34:3	86.2 6	appears	ons	94:13
40:12	00.2,0	134:17	126:15	98:8
10.17	93.20	19111/	Approval	99:11
alternative	99.20	appendix	139:1	102:23
18:2	analytical	50:8	137.1	103:11
amazing	49:23	applicant	approved	107:18
46:19	analyza	122:16	43:20	108:6
-	17:19		126:16	109:11
amend	28:9 77:5	applicants	apron	111:8
42:8	20.7 11.5	123:4	35:20	112:11,21
amended	analyzed	application	00 20	114:19
107:20	48:24	15:7	aquifer	115:7,12,
<b>_</b> .	77:4		15:23	20,22,23
America	analyzing	applied	16:5	116:22
35:19	76:24	39:5	89:15	117:23
amount		apply	110:12	134:3,18
6:3 119:9	Andrea	41:19	140:2,6	141:9
126:18	8:21	42:24	ARARS	143:1,3
λmτ <i>ε</i>	anger	43:9	32:4,10	27025
6.1/ 15	92:9	122:7	79:8,11	11.5
0.14,10	127:12	appointment	80:12,13,	15.16
6 7 23 3.2		appointment	16,17,18	10.16
0,7 22.10	angles	<b>2</b> 7.10	81:10	$51 \cdot 9  0  22$
25.19,22	76:12	37.10	82:1,3	52.1 2
20.1	animals	appreciatio	Dark and	53·1,5 60·14
32.35,0	22 <b>:</b> 7	n	Arbor	00.14
33.23	62:10	46:20	46:18	00·13,14 75·17
05·21 22	144:14	appreciativ	area	/J·L/ 100·1
95.21,22	٨٣٣	e	8:2	100.7
90.4,0,15	AIIII 16.10	65:18	12:12,23	109•7 117•5 7
119.10,24	40.10	03110	13:24,25	11/.5,7,
$120 \cdot 11,$	announce	apprised	14:5 22:9	10 139.12
⊥≒,∠⊥ 101•10	107:12	20:17	32:14	144·20
$12 \ 21 \ 22$	announced	approach	38:25	143.2
⊥J, Z⊥, ZZ 12Q•01	104:3	107:23	41:19	arguably
120·21	101.0		42:20	137:13,16
140·10	announcemen	approached	46:25	138:11
$140 \cdot 10$	t	36:7	48:16	arquing
140.0,0	122:25		53:6,25	arguing



MEETING WURTSMITH RE	ESTORATION AD	VISORY BOARD	MEETING	August 21, 2024 Index: Armedbase
95:17	assessment	131:4	Au	30:18
Armed	17:17,21	aggoggorg	6:13 12:8	32:14
25.12	49:1	122.2	21:12	36:10
55.12	63:8,10,	132.2	54:4 60:6	40:7,24
Arnie	12,16,18,	assist	74:22	48:21
7:9,10	21 64:5,	33:11	75:16,23	50:1
18:4,5,6,	9,12,13,	aggigted	76:6	64:21
18 19:14,	15,17	65:12	78:10	82:8
15 20:14,	65:1,7,8,	00112	112:21	86:22,23
23 21:23	14,22,24	Association	113:5	100:12
26:3,6,	66:2,6,9,	36:6	115:6	114:4
17,19	12,15,18,	assume	116:11	118:12
27:1,9,18	21,23,25	91:16	audianca	119:1
28:1,5,13	67:5,17,	22 20		128:25
45:4,5	23 68:5,	assure	20.1/	132:7
46:13	6,7,12	70:6	August	134:25
52:17,18,	69:1,9,	71:14	5:2,4	135:4
19,22	22,23	assured	16:13	137:9
58:24,25	71:5	82:16	73:8	141:24
59:2,8,	72:13,20		authoritu	1
11,14,18,	73:2,13	asterisk	10.20	background
24 60:3,	74:1,20	75:15	10·20 25·0	/2:1 89:/
12,17,20,	76:13,21,	attack	33.9	122:11,21
24 61:3,	25 77:9	143:12	100.17	backwards
5,17,23	78:3		avenue	103:18
62:3,8,	82:9,16,	attempts	43:8	106:5
19,22	22 84:16,	114.19	award	had
63:2	17 109:16	attendance	16:24	
73:5,6,	111:14	6:6	10.71	23.4
16,19	113:12,22	attondod	awarded	79.5
76:2	117:5,25		9:21	107.2
77:18,19	118:3	102.25	aware	127.20
79 <b>:</b> 23	123:22,24	146.20	19:8 30:6	157.20
80:3,11,	130:14	140.20	32:5	Balance
15,20,22	131:2,3	attending		37:14
81:4,12,	137:11,	5:15		- bank
15 84:12,	15,18	46:21	В	116:10
13 85:4,7	138:4,13,	attention		_ 110-10
86:21	15,19,20	26:10	в-о-в	barbed
87:2	142:5,13	40:18	144:4	78:7
102:17		58:9	h -	barn
114:2,7,	assessment'	73:10	DACK	90:14,16
10,13,16	S	75:8	10:15	
115:1	/5:5	109:13	10:00	base
118:24	assessments		18:20	11:2 14:2
119:1,25	40:2	attitude	24:10	20:8,24
	50:11	41:10	29:16	34:22



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Index: base-wide..Bond

38:12	basically	84:1,2,10	bet	64:8
40:14	18:11	beards	95:13,14	124:13
41:3	19:16	95:1	hia	140:15
46:11	23:7	99°±	9:22	blame
47:11,12,	35:21	beautiful	98:22	106:8
13,15	124:16,21	5:12	126:10	100.0
52:7 53:6	125:3	beaver	120110	blank
57:19	144:16	116:23	bigger	124:6
61:8,24	hasing		141:22	bleeding
62:6,18,	84:17	beds	biggest	47:15,18
25 63:25	01117	12:11	125:21	
66:14	basis	53:12	143:10	blood
77:23	24:21	begin		94:19
78 <b>:</b> 6	82:5	6:6 34:14	bike	95:15
86:17	93:21	48:11	95:3	blood's
94:14,22	144:7,12	124:25	Bill	94:17
104:1,5	bass		6:10 7:5,	
134:12	107:23	beginning	6 30:4,	nwold
hago-wido	107 25	10:16	10,12,16,	75:2
10.11	Battelle	30:19	18,22	84:20
80.18	85:18	70:6	44:4,6	blows
00.10	86:2 87:7	128:25	92:25	83:8
based	battle	begun	128:25	<b>DO</b> 3
11:6	79 <b>:</b> 15	56:13	129:11,	
12:25	_	heheni erel	17,21,24	53.7,8,19
14:4	Bay	Denavioral	130:3	board
16:17	8:17	37.12		5:4
18:21	BCT	belonged	billion	33:13,15
19:6	22:24	83:15	115:15	93:3
20:21	23:1	bolongg	biology	Pob
27:3,24	24:2,13	83.14	111:11	38.10
35:14	31:9	03.11	hiomo	144:2 3
37:21	103:25	benefit	40.17	145:22
41:6 42:7	120:15,	16:9	40·1/	110.22
76:3,4	19,22	128:20	biota	bodies
77:23	121:3,5	benign	126:1	133:13,14
82:10		29:2.23	144:14	Bond
90:4 91:9	101.16	30:4.5.7.	145:11	23:18
101:2	121.10	21	bi+	48:14.18.
113:15	beach		7:16 10:1	19 52:18.
116:19	83:10,13	benthic	12:3	21.23
129:7	90:18	113:18,	18:11	56:19.23
130:23	111:1	19,22	21:4	57:14.17
132:10	115:11,17	144:14	50:16	23 58:6
133:11	heaches	Berry	50:10	10,24
137:4	83.0	- 8:17	52·2 57·1	59:7 10
145:16	03.7		20.11	57 - 7, 20,



MEETING WURTSMITH RI	ESTORATION AL	OVISORY BOARD	MEETING Ind	August 21, 2024 lex: bondscarbon
13,15,23	bottom-	83:2	building	95:8
60:1,8	based	121:18	23:14	100:16
63:4,13	40:19	129:9,13	32:18	101:7
64:2,7,24	hour dow! or	had a c	36:13	104:17
66:1,5	Doundaries	bring	53:8	106:20
71:23	18:23	15:25	56:15	116:4
73:5	20:19,24	26:12	97:8	122:17
75:11,20	21:2	83:4	1 11 11	
76:10,16	44:14,15	121:2	buildings	called
77:18	47:9,11	140:20	10:10,21	24:7
83:3	boundary	bringing	11:1,13,	36:10
84:12	21:20	33:10	17 37:20,	46:5 65:7
85:8.12		97:12	23,25	calling
87:22	Lwod		46:13	35:20
88:12	140:3,7	broad	built	116:4
89:21	boy	9:22	35:1	
90·11 15	78:3	broader	140:3	calls
90.11,15		11:3	210 0	103:24
94.7	BRAC		bulk	camp
95.20	103:25	broke	110:4	77:7
10 25	breadth	109:6	bulldozers	109:10
10,25	106:17	broken	62:24	
100.17,20		19:11	<b>VL L L</b>	cancel
123.23	break	105:2	bullet	86:7
124.7,23	21:9		24:14	cancelled
125:5	30:14	brought	bunch	86:8
131:14	96:21	27:9	32:3	
132:2,8,	breakdown	62:24		cancer
18 134:21	29:22	73:9 83:5	business	95:10,17
135:11,		84:3	7:25 36:2	candidates
14,24	breaking	106:18	47:19,21	123:5
136:3,6,8	21:17	137:5	74:25	
137:1	breaks	brown	busv	capricious
bonds	29:1	74:20.23	35:10	42:24
29:2	48:12	,		capture
		Bryan	buy	107:1
books	briefed	6:18,20	78:8	108:6
138:9	10:19	36:17,20	bypass	114:20
boring	briefing	BS	29:13	128:9
128:1	20:2	95:16		
h	Deviewan	<b>. .</b> .	byproducts	captured
DOTTOM	Briggs	budget	29:21	111:14
	8÷⊥4 70:15 16	35:1		125:13
56:17	/8:15,16,	bugging	C	Car
62:17	24 79:4,	84:14		35:19
75:17	18,21,25			<b>.</b>
110:19,23	80:5,12,	build	call	carbon
111:8	1/ 81:24	172:18	53:7 66:7	30:7,15



MEETING	
WURTSMITH RESTORATION ADVISORY BOARD MEETING	

August 21, 2024 Index: care..clear

care	catch	Certificati	characteriz	City
78:7 95:9	48:20	on	ing	8:18
Cartenan	Cathr	23:2	65:3	Cirri 1
	5.21	actora	abart	8·9 12
40.14	$3 \cdot 21$	112.22	19.7	0·9,12 70·1
Carmona	7·20,21 24·24	112.22	10·/ 72·12	70.1
7:3,4	24.24	chain	91.16	11.20
29:20	25·0 45·20 22	113:25	04.10	clarificati
30:3,20,	43.20,22	145:18	chase	on
25 31:2	71.23,24	challenge	91:18	83:1
38:14,16	12.5,0,	41:1 42:5	check	85:17
45:14	12,13,23	11 1 10 5	59:24	clarify
56:17,22	73·3 96·30 35	championing	119:6	123:21
69:3	102.16	143:11	119.0	123.21
70:15	102.10	champions	checked	Clark's
71:3,16	cattails	143:11	134:17	21:24
87:6	40:18		checking	54:5,6,
120:13	aaugh+	chance	120:10	17,21,22
121:7,12,	20:1	23:22		55:4,6,
17,22	74·16 23	chances	Chelsea	10,13
122:2	/ 4 • 10 , 25	34:12	6:21,23	58:2 60:5
123:11,	cease	- -	36:22,24	75:24
15,19	43:5	change	38:4	117:16
124:1,16	center	18:14	chemicals	128:15
125:1,10	8:9.12	20:17	95:11	132:25
126:14	35:25	24:20	114:22	clav
127:22	51:18	67:21		14:1 4 5
128:18	70:1	68:25	Chevron	51:8 10
arriaa	71:20	129:18	42:22	22 52:5
20.10	/1.20	135:9	43:9,24	
39.19	Central	changed	chief	clean
case	12:4	14:5	106:10	34:22
43:2,5	CERCLA	129:17,19		42:21
65:16	17:24	130:2	chlorinated	cleaned
68:10	22:10		114:11	34:24
81:2	24:21	changing	chorus	53:11
137:12	43:2	129:20	117:24	-
142:22	65:10	characteris	aboao	cleanup
Cases	79:5,7	tics		24:9,22
57:21	80:8,19	58:13	130.12,14	82:7,12
120:6	81:11	abaraataria	chosen	122:22
138:17	91:5	characteriz	130:19	clear
	92:6.12	1/5.0	Chrvsler	38:17
casing	104:15.22	140.0	106:11	84:21
39:3	105:2	characteriz		85:5
casts	106:13.19	ed	circle	117:11
142:7	143:21,22	107:1	78 <b>:</b> 7	121:5,15



### MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING ndex: clients..complying

clients	49:14	125:7	146:7,10	42:3,6
65:12	55:24	132:11,12	acommonted	45:23
aliniaa	59 <b>:</b> 17	134:19	05.25	46:6
27.7	63:14	135:17	104.15	65:18
57.7	66:9,17,	136:14,15	104.12	68:4 69:3
close	25 72:21,	137:12,	comments	70:10
62:12	24 75:8	13,22	16:23	87:7 88:5
74:13	98:14,18	138:1	32:2,13	91:21
closed	104:21	collocting	33:20	94:9
33:6	105:23	6011ecting	57:3	120:13
35:25	124:13	09.20	141:25	128:3
48:7	125:8	07.4	143:2	142:2
119:8	133:20	99·10 100·21	commercial	143:2,14,
119.0	136:11	101.5	0 <i>4</i> · 23	20 146:4
closely	137:6,7,	101.12	94.25	0
46:15	24	104:13	commit	Company
closing		126:12	72:21	80:25
146:11 12	collected	132:19	commitment	comparison
110 111,12	11:23	136:22	94:5	83:17
Closure	12:18	collection	127:3 14	domploto
37:20	15:12	64:4	19	20.17
Club	10:17	104:14	19	20.17
35:19	18:22	124:25	commitments	40.13
37:6	49:4,11, 10,00	125:15	27:13	41.17
	12,22	135:6	committed	70·12 92·10
co-chair	50:4,7	a a l a ma d	69:20	02.10
20:12	51:1		73:24	98.25
22:3	55:19	108.25	74:2	102.5
co-chairs	56:1	column	76:15.23	102.10
5:17	60:8,10	84:21	83:10	completed
146:11	63:11	140:1,6	119:20	10:18
	66:2,13	combined	127:11	17:14
co-located	72:25	21.15	137:7	34:5
133:6	88:12,18	21.13	19717	37:1,10
cocktail	91:8	comment	committee	48:22
40:18	109:3,15,	8:3 13:15	11:25	81:8
	21,23	17:9	31:14	105:13
COLO	111:1,13,	28:21	41:23	
105:7	15,16	58:11	community	completely
Colin	112:2,24	95:23,24	7:1 12:20	08·14 112·01
90:2	115:8	96:10	13:1	113.21
	116:13,15	99:22	14:17	compliance
	117:5,14,	100:8	16:23	43:11
124:24	18 118:2	136:17,18	31:20	79 <b>:</b> 22
collect	120:1	140:17,	36:8	80:7
17:19	123:24	19,23,25	38:5 7	a
20:19	124:9	145:23	Δ1・11	comprying
				43.5



## MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING mponent..contamination

component	16:1,3	conclusions	connect	131:5
110:3	51:2,11,	50:19	37:15	consumption
139:19	23 52:6,	64:18	connected	76:5
compound	13 53:2	92:17	42:18	
28:25	54:25	93:21		contact
30:8	57:19	113:11	conscious	37:5
129:15	61:14	concrete	20:16	76:19
	83:15,17	56:24	conservativ	1/1:14
compounds	91:24		e	144:13
24:6	107:3	concurrent	129:10	145:11,16
29:23	116:6,16	99:21	aonaidorati	contacted
67:12	133:25	T00:0		46:11
129:2	140:1,7	conditions	011 21.5 60.0	contain-
comprehensi	conceptual	39:20	21.5 00.0	201104111-
ve	49:2	62:6	considered	20.22
17:22	50:5,6	135:9	40:17	containment
44:11	65:4	aonduatod	41:24	28:23
con-	73 <b>:</b> 15	01.0	61:10	29:5,8
E6:24		01.0	128:9	contaminant
50.24	concern	conducting	139:14	g
concentrate	69:7,12, 17 70:00	107:9,10	144:10	101:16
23:9,12	1/ /U:23	conference	consistent	101-10
concentrate	101.12	46:18.19	31:25	contaminate
d	139·13 146·7 11	10 10 11	51 25	113:1
29:15	145.7,11,	confident	Constitutio	contaminate
110:8		112:6	n	d
111:20	concerned	confined	81:2	34:3 35:3
145:14	80:7	60:23	constructio	40:23
	concerns	61:1	n	84:2
concentrati	121:2	confining	12:12,13,	91:17
on	145:10	51·9 22	24 34:18	115:5
27.11	146:16	52.5	56:13	117:7,21
$50 \cdot 23$		52.5	98:9	contaminate
51.13,24	concert	Congress	99:12,25	g
$52 \cdot 7, 25$	21:17	143:15	100:9	101:12
55.15,10,	concerted	congression	105:11	101-12
21 54.0, 10 55.10	84:8	al	107:18	contaminati
57.21	aonaludo	43:7,10	117:3	on
66.14	108.10	46:8	constructiv	37:13
76.22	100.10		e	39:19,23
112:3	concluded	congression	93:23	40:24
115:14	147:1	ally	-	41:6,19
	conclusion	43:12	consultant	42:4,14,
concentrati	8:3	conjunction	135:8	16 43:17
ons	138:21	15:1	consultant'	63:25
15:25	–		s	68:15
i la				



## MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETIN@dex: contingency..cross

(				
77:23	69:14	converted	38:8	create
84:9	124:11,19	114:14	56:16	5:13
89:12,18	125:3,25	115:3	89:4 99:5	20:20
91:2,6	126:11		114:19	38:25
92:3	127:9	converts	116:21	39:2 41:2
103:1		29.2	134:22	
104:4	contracted	cooking	138:17	created
110:5,7,	41:25	138:9	141:2	40:11
9,11,18	contracting		_	105:3
111:3,4,	127:10		court	creating
9.17		25:14	5:7 42:25	65:4
112:5.6	contractor	сору	43:2	128:5
113:5.14	9:20	118:14,17	court's	
137:14	13:2,9		43:3	credit
138:6	33:10	core		120:8
142:23	74:10	38:17,18,	Courtney	creek
1/5.10 15	124:20	21 39:8	46:14	54:12
145.12,15	contractor'	110:8	courts	55:22
contingency	s	111:7	43:8.13	89:24
106:20	70:3	116:5,15	10 0,10	91:9
aontinuo	7015	136:20	cover	51.5
	contractors	corner	17:5	cri-
10.0	10:6	36:3 59:5	coverage	24:8
43.21	70:17		112:1	criteria
49:18	contracts	correct	11211	24:7 8 9
67:1 79:3	42:10	30:9,11	covered	12 16 20
98:12	126:5	78:24	12:3 17:6	25:1 6
126:12	120.3	101:21	39:22	23:1,0
145:15	contractual	102:1	40:3	21.24,25
continued	74:9	103:17	62:22	52.4 57.4
125:23	125:2	cost	125:25	52.4,0,11
	contributor	35:2	covers	22 54.11
continues	9	55-2	21:7	$23 \ 54.11,$ $14 \ 15 \ 20$
60:6 67:9	138.4	cottage	21.1	14,15,20
continuing	100.1	94:25	Cox	55·9,14, 16 67·12
32:24	control	counsel	8:19	10 07.13,
37:8	23:14	42:1	מסיי	19 82:7
43:22	35:15,16	106.10	41·21	129:1,3,
98:17	116:25	100.10	41·21 00·10 2/	4,7,18
107:5	aonuonastio	country	90·19,24	144:6,7
127:20		142:22	101.2	critical
	11 21.17	counte	100·14	23:8,11
continuous	31:17	121.10	128:14	28:20
125:15	13/:10	141.13	crash	30:14
contract	conversatio	couple	52:15	76:8
10:24	ns	10:6	53:9,10,	99:20
16:24	86:3	31:8,13	11	22 20
42:8		34:12		cross
1 12:0				



# MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Index: crossed..David

133:17	da-	55:18,25	105:22,23	56:16,17,
134:2	72:17	57:15	108:7	22 63:4,5
	<b>9</b>	58:14,15,	109:18	64:24
crossed	dams	16,17,21	110:3	67:1
104:4	116:23,24	63:11,15,	113:10,12	69:3,25
crosswalk	dang	22 64:4	117:13	70:14,15
20:2	68:18	65:2,5,	118:9	71:3,16
aroud	dark	14,19,20,	119:15	75:11,12
5·22	87.16	22 66:5,	120:1,3	78:16
J•22	07.10	9,10,11,	123:21,24	85:8
CSM	darts	13,15,16,	124:2,3,	87:6,22
88:13,15,	136:23	20,24,25	5,9,13,	104:2
24 90:1	137:1	67:2,5,21	15,17,22,	120:12,13
cumbersome	data	68:5,12,	24,25	121:7,12,
106:14	11:23	13,20,21,	125:7,12,	17,22
<b>G</b>	12:17	24 69:2,	15,23	122:2
cummings	13:21,23	10,20	126:12	123:11,
$0 \cdot 12$	15:12	70:18	130:23	15,19
34.15,10	16:17	71:6	131:5	124:1,8,
103:21,22	17:22,24	72:5,8,	132:10,	16 125:1,
curious	18:6,8,22	11,17	11,12,13,	10 126:14
146:2,3	20:20,21	73:4,25	19 135:17	127:11,22
gurrent	23:23	74:2,7	136:3,12,	128:18
43:6	24:19	75:8,9	13,15	David
83:15	26:21,22	76:14	137:6,12,	7:18.19
83:15	26:21,22 27:16	76:14 77:4,5	137:6,12, 23 138:3,	7:18,19 25:10,12,
83:15 117:1	26:21,22 27:16 28:7,14	76:14 77:4,5 82:10	137:6,12, 23 138:3, 14,16	7:18,19 25:10,12, 18,21,24
83:15 117:1 curve	26:21,22 27:16 28:7,14 31:24,25	76:14 77:4,5 82:10 84:8,22	137:6,12, 23 138:3, 14,16 139:7	7:18,19 25:10,12, 18,21,24 26:2
83:15 117:1 <b>curve</b> 140:8	26:21,22 27:16 28:7,14 31:24,25 32:17,18,	76:14 77:4,5 82:10 84:8,22 87:4,8,	137:6,12, 23 138:3, 14,16 139:7 140:12	7:18,19 25:10,12, 18,21,24 26:2 33:24
83:15 117:1 curve 140:8 curves	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1
83:15 117:1 curve 140:8 curves 140:4	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 date	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 12:21	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 date 12:18	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23
83:15 117:1 curve 140:8 curves 140:4 cutoff 13:21 70:10 20	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 date 12:18 103:4,5	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12,
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 13:21 70:19,20 144:0	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 13:21 70:19,20 144:9	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25,90:2,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17,
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 13:21 70:19,20 144:9 <b>cuts</b>	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25 90:2, 3,5 91:3,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 date 12:18 103:4,5 127:4 Dave 7:2 4	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 13:21 70:19,20 144:9 <b>cuts</b> 21:8	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12, 14 44:12	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25 90:2, 3,5 91:3, 4,8 92:18	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:10	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 13:21 70:19,20 144:9 <b>cuts</b> 21:8 <b>cutting</b>	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12, 14 44:12 48:23,24,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25 90:2, 3,5 91:3, 4,8 92:18 93:6,9,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:19 20:20	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13 86:1,16,
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 13:21 70:19,20 144:9 <b>cuts</b> 21:8 <b>cutting</b> 10:2	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12, 14 44:12 48:23,24, 25 49:5,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25 90:2, 3,5 91:3, 4,8 92:18 93:6,9, 16,21,22,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:19 29:20 20:2,20	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13 86:1,16, 22 96:16,
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 13:21 70:19,20 144:9 <b>cuts</b> 21:8 <b>cutting</b> 10:2	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12, 14 44:12 48:23,24, 25 49:5, 11,12,15,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25 90:2, 3,5 91:3, 4,8 92:18 93:6,9, 16,21,22, 24 94:4	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:19 29:20 30:3,20, 25:21:2	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13 86:1,16, 22 96:16, 22
83:15 117:1 <b>curve</b> 140:8 <b>curves</b> 140:4 <b>cutoff</b> 13:21 70:19,20 144:9 <b>cuts</b> 21:8 <b>cutting</b> 10:2	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12, 14 44:12 48:23,24, 25 49:5, 11,12,15, 16,18,20,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25,90:2, 3,5,91:3, 4,8,92:18 93:6,9, 16,21,22, 24,94:4 98:1,5,	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:19 29:20 30:3,20, 25 31:2 23:25	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13 86:1,16, 22 96:16, 22 100:11,
83:15         117:1         curve         140:8         cutoff         13:21         70:19,20         144:9         cuts         21:8         cutting         10:2	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12, 14 44:12 48:23,24, 25 49:5, 11,12,15, 16,18,20, 21,22,23,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25,90:2, 3,5,91:3, 4,8,92:18 93:6,9, 16,21,22, 24,94:4 98:1,5, 14,18	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:19 29:20 30:3,20, 25 31:2 33:25 24:2	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13 86:1,16, 22 96:16, 22 100:11, 14,18,24
83:15         117:1         curve         140:8         curves         140:4         cutoff         13:21         70:19,20         144:9         cuts         21:8         cutting         10:2         D	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 $33:137:18,20,22,2338:1939:10,2541:4,15,16,1842:9,12,14$ $44:1248:23,24,25$ $49:5,11,12,15,16,18,20,21,22,23,24$ $50:4,$	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25,90:2, 3,5,91:3, 4,8,92:18 93:6,9, 16,21,22, 24,94:4 98:1,5, 14,18 99:6,16	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:19 29:20 30:3,20, 25 31:2 33:25 34:8 28:14,16	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13 86:1,16, 22 96:16, 22 100:11, 14,18,24 101:6,18,
83:15         117:1         curve         140:8         curves         140:4         cutoff         13:21         70:19,20         144:9         cuts         21:8         cutting         10:2         D	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12, 14 44:12 48:23,24, 25 49:5, 11,12,15, 16,18,20, 21,22,23, 24 50:4, 7,17,18,	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25,90:2, 3,5,91:3, 4,8,92:18 93:6,9, 16,21,22, 24,94:4 98:1,5, 14,18 99:6,16 100:22,24	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:19 29:20 30:3,20, 25 31:2 33:25 34:8 38:14,16 44:4	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13 86:1,16, 22 96:16, 22 100:11, 14,18,24 101:6,18, 22 102:2,
83:15         117:1         curve         140:8         cutoff         13:21         70:19,20         144:9         cuts         21:8         cutting         10:2         D         D-E-L-A-N-Y         144:4	26:21,22 27:16 28:7,14 31:24,25 32:17,18, 23 33:1 37:18,20, 22,23 38:19 39:10,25 41:4,15, 16,18 42:9,12, 14 44:12 48:23,24, 25 49:5, 11,12,15, 16,18,20, 21,22,23, 24 50:4, 7,17,18, 22,23,25	76:14 77:4,5 82:10 84:8,22 87:4,8, 10,25 88:12,14, 18,19,23, 24,25 89:6,8, 13,14,23, 25,90:2, 3,5,91:3, 4,8,92:18 93:6,9, 16,21,22, 24,94:4 98:1,5, 14,18 99:6,16 100:22,24 101:2,3,5	137:6,12, 23 138:3, 14,16 139:7 140:12 142:9 143:23 <b>date</b> 12:18 103:4,5 127:4 <b>Dave</b> 7:3,4 25:19 29:20 30:3,20, 25 31:2 33:25 34:8 38:14,16 44:4 45:14	7:18,19 25:10,12, 18,21,24 26:2 33:24 34:1 45:12,13 63:5,17 64:23 75:10,12, 21 78:21 79:1,17, 20 82:25 85:9,13 86:1,16, 22 96:16, 22 100:11, 14,18,24 101:6,18, 22 102:2, 9,13,19



103:7,14,	decisions	definitive	6:19,22	detail
18 105:8,	20:8	86:12,13	8:20,22,	18:12
25	65:15	<b>4</b>	24 10:3,	81:16
la	71:12	aegree	20 33:2	datailad
00.1C	77:22	94.4	36:18,23	
00·10 10F·7	82:9	Delaney	domond	142.13
110.12	107:19	144:3		details
119.13	143:8	Delany	129.14	43 <b>:</b> 15
lays	dogg	38:11	depth	77 <b>:</b> 24
23:16,19	20.15	144:2 3	39:17	detect
[مم]	20.12	111.2,5	description	53:19
21:16	dedicated	delayed	19:19	55.15
101:15 16	47:14	9:25	50:2	detected
101.10,10	deen	delighted	50•2	53:4,16,
lealing	15.23	107:12	design	20 54:2,
70 <b>:</b> 25	110.21 23	107 11	14:6,10	19 55:3,
ebacle	110.21,23	delineate	99:1,2,9,	9,13
42:3	deeper	91:12	21 100:6	75:14
12-5	14:1,4	delineated	101:3,5	78:22
ecide	110:11,16	116:2	102:4	91:22
77:22	deer		105:13,16	detections
118:2	22:7	delineating	106:18	37:4
139:5	22•7	81:24	127:25	78.18
ecided	Defense	89:11	128:7	80:6
38:18	46:6	delineation	designed	00.0
	Deference	75 <b>:</b> 18	14:2	determinat
lecision	42:23		39:15	on
12:24	43:24	demolition	41:7	11:24
18:2		80:2	105:4	42:13
24:3,6	deficiency	demonstrate	107:1	determine
32:7	14:11	S	108.2	88:21
42:21,22,	define	40:10	114:22	91:5
23,24,25	22:20	domonatmoti	111.22	92:2.6.7
43:4,15,	28:24		designing	11.13
19 69:6,	30:4,5	11g	107:10	113:4
13 70:4,	129:2	23.1	designs	115:18
5,19,21		demonstrati	101:8	141:1
81:9	defined	on	106:4	
82:6,15	84:⊥⊥	15:8 16:6		determined
86:7	defining	23:3,5	destroy	112:25
99:8,24	26:15	29 <b>:</b> 14	23:12	determining
100:8	27:13	40:15	28:22,24	91:1
104:20	84:9	Denige	destroys	92:20
104:20 106:17	84:9	<b>Denise</b>	destroys 30:17	92:20

department



61:7

143:14

29:22

MEETING WURTSMITH RE	ESTORATION AD	VISORY BOARD	) MEETINIGdex: c	August 21, 2024 developmentdraw
development	115:6,23	discovered	19 63:1	dogs
18:9	dint	104:3	75:24	59:20
27:10		diaguagod	98:15	62:11
36:12	90.7,0	34.10	100:3	77:9
94:23	95.5	34.19	107:6	dollar
DHHS	disagreeing	discussing	divide	74:25
33:3	43:1	27:15	21:8	71.23
5515	disagreemen	38:8,9	21.0	double
diagram	t	59:1 71:2	Division	119:6
73:15	43:3	discussion	32:4	120:9
die		24:13	138:23	doubt
40:24	disappointe	28:6	DNR	69:20
4:55: m. 1.	a 141.0 00	34:18,20	141:5	106:14
	141.9,20	48:1 87:7	dogumont	142:7
07.10	disappointi	diaquagiona		dovotajl
111.21	ng	27.16	17.0,10	57:25
digging	123:6	27.10	24·4 /1·2 7	57.25
104:13	disassemble	52.5,10	50.8 64.4	downs
dilute	d	disparity	65.7	39:20
61:22.24	116:25	58:3	67:22	dozen
	110 20	dispel	68:23	117:22
diluted	disbursed	70:2	77:13	
61:25	65:25		82:6	dozens
dimensions	discard	disprove	84:11	45:24
110:1	94:1	8/:10	121:19	draft
dioxide	discharge	distance		13:6,8
30:15	83:20	94:10	documenting	18:9
50115	114:3	distribute	104:12	32:1,13
direct	115:13 16	47:23	documents	50:6 56:1
76:4,19	133:3	17-25	33:18	66:7
77:14	100 0	distributio	65 <b>:</b> 10	68:21
92:8	discharged	n	ססס	69:1
117:13	83:22	90:25	8:6 41:2.	109:18
144:13	115:5	112:5	4.25	117:25
145:11,16	discharges	district	42:1.2.5.	drafting
directed	89:19	33:2	20 43:5,	65:9
106:16	115:23	36:18	15,16,21	duefte
direction	116:1	ditab	69:7,17	draits
69:15	133:2	12:5 7	70:18	13.19
	discharging	54:5, /	71:16,18,	drank
directions	83:16.18	59 <b>:</b> 4 16	21 82:16	95:1
21:14	91:6	17 60:2		96:12
directly	133:8.25	4,9 61:2	۲.100 S	draw
41:25	134:25	8,12,13	41·10	39:20
47:1	136:21	62:2,18.	dog	109:12
		02 2,20,	87:18	



## MEETING

### WURTSMITH RESTORATION ADVISORY BOARD MEETING

August 21, 2024 Index: drawn..enjoy

113:12	42:22	0at	effort	end
128.5	88.15	74·21	20.16	5·10 6·3
120.2	00.17	74.21	20.10	12.25
drawn	Duell	78:10 11	84:8	22:15
136:4	54:11	93:13	01.0	33:19 22
drilling	112:23	JJ.13	EGLE	40:11 25
128:12	duq	eating	6:14	48:13
	62:20	76:4 84:4	8:14,17	55:22
drinking		145:20	10:19	70:7
25:5 76:5	dumped	echo	13:1,15	71:15
90:21	142:20	5:13	16:21	74:7
96:2,9	dumps		17:9	81:16
144:15	12:6	eco	24:19	82:18
Drive	A	129:8	27 <b>:</b> 15	83:21
94:11,15,	duplicating	ecological	28:6 31:5	89:22
25 95:12,	$\perp \perp / \cdot \perp Z$	50:11	75 <b>:</b> 25	90:12
15 114:5,		63:7,9	78:16,18	91:9 13
24	Е	65:7	79 <b>:</b> 25	16 94:22
a		109:4	80:7	98:10
ariven	oarlior	113:21	85:16	103:10 11
91:23	97·8 25		129:6,8,	104:22
driving	136.9	economic	20 131:23	124:12
56:6	127.10	//•21	132:12	125:24
	120.24	edge	138:23	127:9
53.5	139.24	134:1	EGLE's	143:9
98:20	early	edges	16:19	110 9
99:17	15:5	62:15	34:2	ended
100:12 14	16:25	02:15	75:18,23	84:1
102:23	17:13	educate		ends
103:11	55:24	38:18	eigntn 107.7	113:1
128:19	98:4	educated	$\perp 2 / \cdot /$	
	earthen	119:7	electronica	
drop	116:24		lly	70.5
60:3		effect	57 <b>:</b> 5	79.0,22
dropped	east	43:20	alements	00.7
19:17	26:4,9	76:5	29:5	01.1,2
22:2	53:/ 60:4	84:24	29.9	enforcement
	//:LU	effective	eliminating	81:12
ary	85:10,15	35:3	34:21	Engineer
59:21	87:3,25	106:14	elucidated	8:9 12
62.10	91:11	offortivene	92:19	70:1
dryer	94:3,21	errectivene		71:20
96:12	142:16,20	13:4	encourage	/ 0
drving	eastern	тэ•т	37:24	engineering
53:10	48:4	effects	38:1 64:8	122:21
55.72	90:10	44:20	100:8	enjoy
due	94:11			44:2



MEETING WURTSMITH RE	ESTORATION AD	VISORY BOARD	MEETHNER: enor	August 21, 2024 mousexperience
enormous	131:5	78:11	10:12	excuse
94:4	135:8	83:16,25	39:21	24:2
		85:11,15		26:16
enrolled	environment	87:25		107:22
37.9	ally 106.2	88:2,5	107.7 145.6 10	130:6
ensure	120.3	89:24	145.0,10	ovoraiao
127:19	environs	94:3,11	everybody's	27.10
ensuring	42:17	112:18	31:19	27.10
47:14	envision	141:7	63:20	exercises
	70:11	142:16,	evervone's	35:17
entered	, 0 11	20,24	16:9	exist
126:25	EPA	ovaluato		67:13
entering	43:20,23	17:24 25	evidence	
135:22,25	106:11	10.18	40:12	existing
,	equate	49·10 E0·10	41:6	17:4
Entertainme	44:10	50.10	86:11,14	29:12,17
nt	11 10	109.3	evolve	48:23
5:6	equates	evaluated	67:10	exists
entire	51:5	73:21	07110	19:2
51:9	equipment	82:11	evolved	72:17 24
82:14	23:25	106:1	67:9	110.5 7
94:13	29:14	113:20	135:9	113.0
128:6	56:7	133:14	ex-	113.7
134:18	50 /		79:12	expand
142:7 16	equity	evaluating	,,, 12	108:5
143:4	65:2	58.12	exact	expanded
11311	Eric	113:12	70:17	18:25
entirety	6:13.14	evaluation	examples	126.10
146:5	,	13:3 19:6	79:18	120.10
entity	ESI	24:21		expansion
79:7 80:8	27:12	27:3	exceedances	40:18
106:8	established	37:20	37:4	expect
10010	43:11	84:6	exceeding	10:3
environment		111:13	75:22	17:10
37:13	ESTCP		_	39:3
43:25	23:3	eve-	exceeds	86:12
44:11	Etten	5:18	51:6	00.12
113:24	15:12	evening	Excel	expedit-
134:9	20:21	5:19 31:6	12:19	79:9
environment	21:11	47:25	49:24	expediting
al	40:19	48:20		79:12
23:2	42:16	105:1	exception	12-14
44:19	44:8.14	146:25	89:3	expeditious
46:5 68:3	45:15.19		112:23	ly
69:9	54:3.12	event	exciting	79:9
106.10 22	55:11.22	62:1	5:19,21	experience
100·10,22	75:16 23	events	- ,	65:12
エムフ・セ	, , , , , , , , , , , , , , , , , , , ,			00.17



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Index: experiencing..fill

				1 0
68:11	extend	facilitator	90:5	109:17
70:25	40:20	5:5	fast	feet
122:22	46:20	facilities	54:16	14:1.3
131:2	51:7,21	38:13	79:11	59:19
142:3	89:25			61:20
experiencin	extends	facility	fate	94:12
q	52:5	36:11	50:13,15	110:5,19,
41:8		fact	fear	21,22
	extensive	65:18	74:15	c 11
experts	142:2	81:1 87:8	food	fell
40:10	extent	94:3	DO.C	51:17
41:24	15:20	139:25	99.0	fellow
126:4	16:2	140:11	feasibility	32:25
142:2	18:22	factors	17:23	field
143:2	41:5	67.16 20	18:1	0.2E 1E.0
explain	42:13	07.10,20	19:1,7	$9 \cdot 25 \pm 5 \cdot 6$ 17 · 1 12
24:25	66:11	facts	41:14	1/·1,13 25·15
63:9 79:5	68:6,9,14	79:14	65:11,15	33·13
105:16	76:19,23	108:4	67:3 71:5	49.0
131:15	89:11	failing	79 <b>:</b> 10	100.21
ownlainod	91:1,6	145:17	81:7 98:6	122.24
	92:2,11,	110 11	99:7	123.24
140.0	13,22,24	fair	106:23	124.12
explanation	106:22	6:3 78:12	features	fieldwork
21:6 24:1	113:4	fairly	132:25	50:4
38:17	ovtract		101 10	fight
109:25	14:6	<b>C</b> . <b>1 1</b>	February	82:18
110:13	11.0	Tall	16:12	02 20
116:19	extraction	23:5	fed	fighting
134:7	13:25	61:18	50 <b>:</b> 7	73:7,10
exposed	14:3	135:15	95:18	figure
39:22	29:12	fallacy	<b>C</b> . 1 1	33:3,8
138:6	56:21	107:21	Iederal	65:19
	107:5	falso	/9:6 80:8	134:21
exposure	114:18	70·1 12	81:1 97:9	144:24
37:25	extrapolati	137.19	feed	<b>6</b> ¦
38:2 84:4	nq	129.20	66:15	120.00
106:22	104:10	130.20	98:18	132:22
133:3,12,		familiar	feedback	137:4
15,18,19,	eye	13:2	12.25	figuring
21,22	15:9	116:8	13.0 16.5	32:9
134:3		familv	12.9 10.2	file
expressed	F	95:18	feel	43:0
104:25			32:7 75:3	13.2
		farther	95.7	£;11
011000000	fogel:5+		93.1	LTTT
expression	facelift	89:23	103:23	26:21



MEETING WURTSMITH RE	August 21, 2024 Index: fillingforce			
filling	92:4,8	fiscally	fluorine	14:7
76:21	113:10	127:14	29:1 30:7	footprint
140:12	116:18	fish	foam	11:17
filter	122:9	74:16,18,	15:12	
34:25	129:3	19 76:3,	17:20	force
	131:1,10,	6.7 78:9.	23:7.9.10	6:8 8:6,
filtration	12 136:19	10 93:11	28:20	9,12 9:17
34:20	142:12	145:19	45:15,19	13:1,7
final	finding		63:22	17:19
10:22	124:20	five-year	72:5,8,	19:19
13:10		107:8	10.21	20:5,12
14:14	findings	flabbergast	73:7.9	25:13
37:19	13:12	S	76:17,24	26:10
42:2	14:18	130:25	77:6.8.11	31:24
55:25	fine	67	83:6.8.	32:2,6,
57:1	75:3,4	flat	24.25	15,18
74:10	90:13	140:4	84:19.24	34:16
75:7		flaws	85:1	37:7 39:1
81:10	finish	142:4	138:3	40:1,11
92:23	16:16	£1	142:11	42:23
99:1	66:22	12:0		43:12
101:3,20	91:1 98:9	42.9	focused	45:17
102:8,12	finished	floor	60:14	46:2 49:9
105:13,	10:9 11:4	5:12,16	fold	56:2
16,19	124:10,12	flora	61:25	70:1,3,4
106:4,24	125:5	40:16	6 . 1 . 1 . 1	71:20
107:16,25	finiching	10 1 10	rolded	73:11
£1	64.12	flow	67:2	75:22
inalize	04.12	21:18	folks	81:17
98.3	fire	47:15	33:3 64:8	82:13
finalized	58:4	61:8,19,	65:3 72:1	83:14,15
16:22	115:20,	24 62:6,	94:25	84:6,23
32:6	21,23	14,18	122:7,19	85:15
72:20	firefightin	88:22	follow	86:23
75:5	q	112:13	31:13	8/:1/
finally	83:18	128:6,21	69:15	88:11 00:10 17
35:2 59:3	<u>.</u>	flowing	88:25	89:10,17
73:10	tirm	21:14	91:5 92:5	$92 \cdot 1, 5, 7,$
, 5 10	15:2	47:13	98:6 99:7	10 93.6,7
find	121:2	111:9	120:22	94・44 101・5
20:22	131:3	flows	141:1	104.5
25:22	firsthand	LTOMP CU.E		⊥UO・⊿⊃ 107・11
51:11	23:25	0U·J 112·11	food	100·22
53:21,22,	figal	112·14	113:25	エUシ・43 111・7 13
23 54:11	106.00	fluoride	145:18	⊥⊥⊥・/,⊥⊃ 112・24
74:12	120.23	30:15,20	foot	エエム・ム4 11 <i>に・</i> ハ コハ
91:11,13				110.4,14



MEETING WURTSMITH RI	ESTORATION AD	VISORY BOARD	MEETING Ind	August 21, 2024 dex: Force'sgaps
117:6,12	71:22	145:24	funds	92:10
118:1	123:9	6	46:7	93:1
119:8,12,	<b>c 1</b> .	ITUICIUL	c .	106:16
18,25	fought	79:9	fungi	122:6,15
120:10	73:6	frustrated	15:4	123:12
121:8	found	104:24	fuselage	126:6,22
122:24	20:7	frugtration	53:10,24	Garath
131:19,22	31:16		futuro	
132:12	51:1,13,	5 101·25	20.0	18:1
142:14,	24 52:7,	104.25	20.9	gap
17,18	13,25	FS	32.10	14:7
	53:15	92:14	44.1	18:6,8
Force's	54:8,14,	፹፹∩ 2	45.10	26:22
143:17	20,24	12.0	4/.3,8	27:16
144:20	55:1,12	21.15	50.20	32:18,23
Forces	88:6	24.13	58:1 82:1	41:15,16
35:13,17	93:12	20:4 E1:2E	146:21	66:10,16
<b>c</b>	110:11	51.25		69:10
forecast	111:11	52·0 52·10 15	G	71:6
97:25	116:3,6,	53.12,15		73:25
107:8	10 137:14	fueling		84:8
forest	-	35:14	GA DE 110	88:19,23
6:25 60:5	fourth	£.,11	35:16	90:3
<b>5</b>	101:23	22·1/	Gaines	91:3,4
Iorever	fowl	33·14 42·12	7:5,6	94:4 98:5
67:18	125:25	42.13	30:4,10,	99:6
form	~ . · . ·	92·24 107·12 11	12,16,18,	105:23
49:24,25	fractionati	107.13,14	22 44:5,6	108:7
63:16	on	fully	92:25	109:18
68:21	23:8,10	127:11	128:25	118:9
109:18	28:20	functional	129:11,	124:15.
formall.	87:13	103:16	17,21,24	24.25
NOT C	frame	103.10	130:3	136:12.15
02.3,0	17:2	fundamental		137:23
format	frankrag	142:4,10	gaining	139:7
18:11	rankness	funded	22:8	140:12
117:1	69:4	126:24	galleries	110.17
formed	Friday	127:4	56:9	gaping
16.E	123:1	127.1	a.11.0mm	142:9
40.5	frianda	funding	gallery	gaps
63.25	146:21	42:12	50.10	16:17
Iorward	f	102.10	gallons	50:17,18
5:23 20:3	10.15	105·10	61:25	65:19
32:8	10:02	エムひ・ムン 1 0 7 • 1	Gangnuss	74:2,8
34:24	19:23	$\perp \angle / \cdot \perp$	8:8 69:25	75:9
66:20	81:6	fundings	71:1,9,	88:18
/U:TO	83:13	35:24	13,18,25	137:6



MEETING WURTSMITH RI	ESTORATION AD	VISORY BOARD	MEETING	August 21, 2024 Index: Garyguys
142:9	86:12,13	gorilla	grieved	74:10
Govern	108:17,21	69:5 70:2	43:4	131:12
Gary	119:9	~~~~		
6:21,23	120:7,8	government	ground	GSI'S
36:23,24	121:19	6:/ 31:15	12:3	131:16
gas	122:16	34:14	60:16	guarantee
11:4	138:20,25	81:2	83:22	71:1
asther	141:13,	governmenta	groundwater	120:4
gather	14,16	1	15:18	guarantaag
30.22		12:1	21:8,18	guarancees
39:7,10,	giving	87:20	34:22	123:8
15 42:12	137:19	<b>.</b>	35:3	guess
125:17,24	glad	gradient	38:23	14:8
gathered	134:12	13:14,18	39:6,7	46:24
38:20		grants	48:22	60:6 68:3
123:21	global	36:1	50:13.15	75 <b>:</b> 25
124:18,22	67:8		51:4 7	77:16
125:23	goal	grasping	14 24	82:8
	42:4	102:6	52·8 14	84:11
gathering	92:23	Gravity	$24.0, \pm 4,$	85:17
39:12	144:18	40:4	24 JJ·J	86:1 89:4
124:2	111110		00.01	114:25
125:25	goals	great	00.21	119.14
128:2	42:2	21:22	90.2,8	125.12
gave	aod	27:17	110.10 14	125.10
15:21	102:16	31:18	112:12,14	133.19
31:9	102-10	46:21	114:20	guide
46.13	good	58:10	117:21	125:2
97.2	5:18	94:10	128:2	136:22
07.2	21:6,9	141:6	133:7	guidelineg
gee	31:6,21	greatest	134:10	
93:24	32:1	106.22	137:23	140.18
gonoral	70:18	100.22	145:5,14	guiding
12·1	71:7	Greg	groundwater	125:3
72.1	76:18	7:13,14	/surface	aun
generate	86:6	8:8,10	110:14	guii c4.0
136:23	112:1	45:8,9		04.0
gonorationg	119:11	69:25	group	guys
	122:9,11,	71:1,9,	46:4,5,7,	14:18
44.1	16,21	13,18,25	16 47:13	23:21
give	137:20	92:10	72:16	49:13,24
5:9 14:18	138:25	122:3,6,	74:20	51:16
20:5	143:12	15 123:12	92:16	56:6
22:13		126:6,22	arowing	75:22
36:25	goodness	, _	AU-JE	76:1 89:6
50:25	77:1	grenade	40.20	95:17
77:24,25	90:22	81:23	GSI	97:23
78:12	143:16		34:3	104:20



MEETING WURTSMITH RI	ESTORATION AD	OVISORY BOARD	) MEETING	August 21, 2024 Index: halfhire
126:4	hangar	headlines	138:4	Неу
131:11	34:23	78 <b>:</b> 2	helped	92:10
134:12	51:15	health	143:15	hiah
135:1	53:8	6:19.22	115 15	16:3
139:13	Hannah	8:22.24	helpful	27:10
	8:23	10:20	9:13	61:14
ч	-	25:4 33:2	33:13	107:2
	happen	36:18,21,	46:15	110:18
	44:11,20	23 50:10	Henry	115:14
half	happened	63:7 65:8	5:25 7:1,	130:10
70:24	61:18	84:15	2 11:9,	
81:20	72:17	95:9	11,12,21	higher
97:4	• • • • • • • • •	106:21	12:17	53:2 58:3
100:16	nappening	129:6.7.	21:3,4	60:20
102:20	20:11	10.12	26:14,18,	61:10
103:15	42:15		20,25	91:24
109:22	44:13	health-	27:5,7	133:24
115:15	72:2 93:1	based	28:11	139:25
130:22	110:24,25	24:9,12,	30:13,17,	highest
132:6	124:4	17,21,22	23 31:1	51:2,13,
135:7	142:24	25:7	34:2	23 52:7,
hand	happy	27:25	38:5,7	12,20,25
9:3 81:23	36:15	129:2	57:15,18,	53:13,18,
91:23	107:11	hear	24 58:7,	21,23
140:18	Harbor	32:14	23 61:7,	54:8,18,
146:11	36.10	94:6	22,24	24,25
handla	50.10	139:13	62:6,17,	55:6,12
nandle	hard	143:13	21,24	66:14
81.22	73:6	146:16	83:4	133:17
handled	135:20	hoond	87:23	139:25
29:24	hardware		89:2	140:5,6
78:9	42:10	44.7 04.9	90:9,13,	highlight
Wandlow		/3·22	17 91:14,	114.0
6:14 15	harmful	120.12	19	114.2
25:19 22	30:6	120.13	102:21,22	highlighted
25:19,22	hate	132.4	108:16,18	13:19
31.5 6	127:2	hearing	112:10,	highly
33.25		38:16	14,17,20	92:5
33.25	hazard	76 <b>:</b> 12	114:4,9,	92·5 115·4
110.24	10:11	106:2	11,14,17	117.21
120.24	head	143:9,17	115:2	136.10
120.21	30:1	heart	118:7,11,	130.19
$12 \cdot 10,$	129:16	101.4	13,19,21	hind
130·2 22	hondor	1/2·17	136:18	94:21
133.4,24	neader	143.11	139:17	hire
hands	50.20	heavy	146:19	13:1
141:2		56:7		



MEETING WURTSMITH RI	ESTORATION AD	VISORY BOARD	D MEETINGIndex	August 21, 2024 hiringimplement
131:3	105:23	31:4 34:9	Huron	116:14
hiring	107:20	35:6	88:3,4,10	identify
123:9	hoping	36:17,22	89:19	13:13.24
110 9	26:20	38:4,14	90:10,18,	68:14
historicall	20 20	44:4,21	20 91:2,	79:23
У	horizontal	45:4,6,8,	7,20	111:8.23
127:5	128:1,12,	10,12,20	94:12	113:14
history	16	47:20	107:7	122:5
75 <b>:</b> 1	horror	48:10	hydraulic	136:20
<b>b</b> : <b>b</b>	104:6	97:2,11,	- 39:3 40:5	139:18
04.15	hours	16,20	128:5	
94:15	norse	102:21		identifying
hold	90:14	103:21	hydrogeolog	131:16
28:18	hot	108:9,14	ic	135:6
48:12	35:14	118:23	140:11	ignoring
halag	108:3	120:12		111:4
	h a t am a t a	128:23	т	143:23
142.9	10050005 40.17	130:4		
Homeland	42·17	140:15	_	illegal
12:1	hours	144:1	I-	47:12
31:15	96:24	145:22	101:19	illegally
homeg	house	146:6,9,	107:10	47:13
33.4 37.9	78.8	24	idea	
91·91	94·14	HR	21:9	Image
) <b>1</b> •21	90:18	122:4	90:24	11.00
honest	50.10	100 1	126:9	imagine
77:1	Housekeepin	HRX	137:15	140:3
honestly	g	128:16	idontical	immediately
135:5	138:25	huge	20.0	47:6
_	housing	94:4	59.0	17:0
honor	112:21	117:21	identified	immunity
43:21	114:19	h	10:11	79:5,15
hooked	115:12	nugely	11:14,17	80:9
33:4		33.12	16:17	impact
h e e lever e	Howard	human	18:21	- 19:12
nookups	5:3,5	8:20,22,	37:23	67:17
33.0	6:5,10,	24 50:10	50:18	77:20
hope	13,16,18,	63:7 65:7	53:14	129:4
6:1 20:23	21,24	106:21	55:15	
42:23	7:3,5,7,	129:7,10,	65:19	impacts
43:20	9,11,13,	11	68:9	129:7
64:15	15,18,20,	humang	105:21	imparted
74:12	22 8:10, 12 16	144:12	117:6,11	113:17
78:13	⊥3,⊥6 0.1 E 1E	145:11 10	132:6	imploment
82:23	9:1,5,15	_ :J· ⊥ , ⊥ J	138:1	ADIE
95 <b>:</b> 17	21:3	hunters	identifies	42·0
	22:12,22	59:21		TUZ·T2



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING

				<u> </u>
implementat	inches	76:24	industry	132:14
ion	39:17	incorporati	94:24	injunction
99:2	ingling	incorporaci	138:12	12.12
102:24	100.01	40.1		43.12
	128.21	49•⊥	Inference	inorganic
implemented	include	increase	/4:14	28:25
82:4,7	37:11	9:12	infiltratio	
99:10	49:10		n	input
109:12	50:2,10	incumbent	56:9,18	16:21,23
implementin	57:2 73:4	92:1		21:5
α	100:19.20	independent	influence	131:24
79:7 80:8	100 19,20	13:3	85:19	inputs
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	included	141:8.10	86:3	132:23
important	32:23	12 13 17	inform	101 10
5:11	40:16	19 21	65:10	insert
38:19	47 <b>:</b> 5	142.25	82.0	59 <b>:</b> 5
41:17	50:16	146.2	02.9	ingight
68:7	72:13	140.2	information	108:21
74:3,18	93:14,20	independent	12:21	100.21
76:8		ly	14:9	inspection
77:4,25	includes	120:7	17:16	132:11
81:6	63:7	indication	39:11	ingtall
144:18	including	indicating	40:1	14.2
	77:5 91:6	16:14	45:18	14.3
importantly	95:25	indication	46:1,3,19	installatio
44:1	96:7	88:7	50:12	n
in-depth		indianton	56:4 64:6	16:4 52:1
33:14	incomplete	Indicator 04.1	67:16,21	ingtallatio
	41:18	94.1	71:4.6	
inappropria	137:16	indirectly	113:15	26.0
te	138:11	87:20	125:17.24	30.2
136:25	incorporate		126:1	installed
inaudible	14:6		131:18	56:9 89:3
62:23	17:16,18	19:11,16	137:16	ingtongo
79:13.22	55:25	38:2	17 19	
82:23	63:15	133:13,14	138.7 11	20.0 111.15
92:12	69:21	individuall	13 13	144.10
122:8 17	00.21	У	10	instances
$20 123 \cdot 13$	incorporate	28:4	informed	81:19
125.14	d		39:17	
127.2 20	11:2	individuals	ingostion	insurricien
120.010	13:22	31:17	77.15	τ
123.3,10	14:10,12	indoor	//・10	66:24
inception	17:20	10:10	initial	integral
93:4	79:11	11:18	11:6	139:19
inch		31:24	13:12	
	Incorporati	37:18 23	36:12	integrated
62:9	ng	5, - 10,25	37:21	53:6
	49:6			54:3,15,



### MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETIN@ndex: integrative..Jessie

				9
21 55:1,	interrupt	44:12,16,	12:12,23	121:24
4,11	24:25	17 65:6	23:15	126:18
75:16	introduco	68:2	32:14	139:24
intogrativo	8.6 07.6	82:15	34:19	141:8
54.10	0.0 97.0	84:8	48:16,17	igguod
54.10	introductio	85:20	98:19,20,	12.12
intend	n	92:15,22	23 99:11,	43.13
85:21	64:3	98:6,24	17 101:19	40.24
125:18	introductio	99:7,19	102:9	issues
intent	ng	100:5,17,	108:6	10:2
70:18	7:24	18 101:8	109:11	11:15
123:2	1.21	105:20,24	TDAC	127:17
123.2	introductor	109:19,24	10.10	itom
intention	У	111:22	18.12	34.2 6
105:3	74:8	113:4	20.4	JI·2,0 45·16
interaction	intrusion	118:10	32:10	43.10
g	10:5	139:8,12	41:21	47.24
110:14	11:12 15	142:6	4/:1/	40·1 75·12
110.11	33:11 15	146:15	100:4,10	100.10
intercept	37:17		101:4	110.1
103:2	57.17	investigati	102:11,13	110.4
interested	inundated	ons	105:15,25	items
46:22	61:11	94:2	106:2,4	16:20
	investigate	invite	107:1,10,	36:5
interfaces	26:10	48:5	11 143:10	46:23
42:16			IROD	47:23
interim	investigate	invoive	32:1	48:7
12:24	d	27.19	· · · · · · · · · · · · · · · · · · ·	itorativo
20:11	20:4 27:2	involved	107.01 00	67.25
56:5 57:1	88:10	35:12	107:21,22	07.25
65:25	investigati	46:4 87:8	IRPS	
67:2 82:5	nq	125:21	19:16	J
106:21	44:15	127:25	Truing	
107:14	107:10	130:17	LT VING 5.5	January
108:2		131:15,17	J• J	34:25
125:11	investigati	132:3	isolated	124:19
143:13,18	on	involucement	42:17	121119
	9:23 10:5		issuance	jerk
internal	11:1	93.2	43:23	104:22
32:16	12:19	Iosco	13.23	Jessica
38:8	16:19,25	35:20	issue	6:24
interpretat	17:15	37:6	61:6 71:4	
ion	20:18	TR	73:7,9	Jessie
43:1,6	24:22	63:6	74:9	5:3,5
50:12	27:16	0.5.0	76:19	6:5,10,
141:14	32:19,24	IRA	78:10	13,16,18,
	37:17	8:2	87:15	21,24



MEETING WURTSMITH RI	August 21, 2024 Index: Jimlake			
7:3,5,7,	45:1,3	78:15,21,	62:14	lab
9,11,13,	64:25	24 79:4,	64:11,17,	100:22
15,18,20,	66:4	18,21,25	20 68:2	labelad
22 8:10,	67:6,25	80:5,12,	69 <b>:</b> 7	
13,16,25	76:9,11,	17 81:24	94:10	46:12
9:1,5,15	17 80:20,	83:2	97:24	laboratory
21:3	24 81:5,	121:18	98:22	48:24
22:12,22	14 106:6	129:9,13	108:20	lack
31:4 34:9	112:9,11,	<b>VO 125</b>	131:20	39:13
35:6	16,19	E2.14	140:4	40:15 16
36:17,22	118:12	52.14	141:7	41:1
38:4,14	130:6,18,	53·9,10,	142:23	82:10
44:4,21	25 132:1,	24	Imou	02.10
45:4,6,8,	4,16	Keatley	10·24	lagoon
10,12,20	134:6	8:21	19.24	34:21
47:20	135:4,12,	Kellv	knowledge	lagoons
48:10	19 136:1,	97:9 10	120:9	12:10
97:2,11,	5,7,16	$14 \ 145:25$	Kyle	
16,20	137:8	146:16	7:7 8	lake
102:21	139:16,23	140.1,0	45:1 3	15:12
103:21	Togh	Ken	64:25	20:21
108:9,14	7.15	12:15	66:4	21:11
118:23	7.13	23:15	67:6 25	22:19
120:12	July	kids	76:9 11	39:20
128:23	12:16,25	77:7	17 79:4	40:19,22,
130:4	24:2	84:3,4	80:20 24	24 42:16
140:15	31:12	· · · -	81:5 14	44:8,14
144:1	57:2	kilogram	106:6	45:15,19
145:22	מיתנוד	53:5,14,	112:9.11.	54:3,11,
146:6,9,	57:12	18 55:10,	16.19	12 55:11,
24	64:8	15	118:12	22,23
Tim	91:16	kilometer	130:5.6.	75:16,23
9:3 7 10	96:20	133:12,	18,25	78:11
J J J J J J J J J J J J J J J J J J J		15,22	132:1,4,	80:6
job	jumping	136:24	16 134:6	$83 \cdot 7, 12,$
123:8	92:17	kind	135:4,12,	16,18,21,
join	jumps	21·7	19 136:1,	25 84:7, 10 05:11
117:24	64:17,18	48.20	5,7,16	10 85:11,
	Turne	40.20	137:8	15,24
Joined	June	50·21 23	139:16,23	86.19,21
5:7	40.2	51:2 17		
joining		20 25		00.2,4,5, 10 00.10
7:15	ĸ	52:9	L	LU 0J·LJ 00·10 17
48:19		54:23		$30 \cdot 10, 17,$
Jones	Kalan	55:18	L-I-V-E-L-Y	$\begin{array}{cccccccccccccccccccccccccccccccccccc$
7:7,8	8:14	61:9	146:2	93:13



MEETING WURTSMITH R	August 21, 2024 Index: lake'sliter			
94:3,11,	91:20	leave	79 <b>:</b> 23	120:15
12,21	large	127:2	80:3,11,	likelihood
107:6,7	21.7	loawog	15,22	68.25
109:22	21.17	10.25	81:4,12,	00.25
110:17,	$33 \cdot 17$	40.25	15 84:13	limited
20,23	39·7,21	02.9,14,	85:4,7	37:24
111:5,8,	40.18	22	86:21	40:2
23	larger	left	87:2	44:19
112:15,	39:11	55 <b>:</b> 20	102:17	84:5
18,24	57:22	75:2 83:7	114:2,7,	limita
128:7,21	76:20	90:9	10,13,16	126.11
134:20	113:25	117:2	115:1	120.11
140:3,9	1	1	119:1,25	Lingo
141:7	lastly	11.5 07.2	_	7:11,12
142:16.	3/:16	11:5 27:3	letters	45:6,7
20.24	38:1 47:7	legal	37:2	94:9
20,21	late	43:8	letting	96:11
lake's	20:2	80:24	125:1	
110:20	119:18			lining
lakes	<b>.</b>	legislators	level	35:2
93:11	latest	45:24	16:1	linked
141:6	49:16	97:5	39:20	96:1,8
111.0	Laudable	Leriche	55:24	
lakeshore	107:3	7:9,10	levels	11st
39:16,18	_	18:4,6,18	110:11	16:20,21
88:2	Law	19:15	115:18	33:17
land	43:1,7,9,	20:14.23	126:16	45:16
68:8	14 81:2	21:23	145:7	47:24
115.24	laws	26:3.6.	143.7	74:2,7
113.24	43:10,12	17 19	leverage	listed
landfill	68:21	27:1 18	17:3	16:9
58:3	_	28:1 5 13	1.2027	33:18
101:13	layer	45:4 5	24:15	74:8
102:23	14:4,5	52:17 19	21.12	
128:20	51:8,22	$22 \cdot 17, 12,$ $22 \cdot 58 \cdot 25$	LF30	listen
landfillg	52:5		98:20	74:13
00.01	lead	33.2,0, 11 1/ 10	1.F30/31	141:23
101.11	40:13	11, 14, 10,	99:17	143:20
101.11	41:4.7.16	24 00.5,	103:11	listened
landscape	11 1///10	12, 17, 20,	103.11	104:7
104:18	leadership	24 01·3,	library	101 /
languago	71:21	5,17,23	25:16	listening
107.00	leads	b∠:3,8, 10,00	57:6	95:16
	42:9	19,22	life	liter
lapping	12 /	63:2	106.10	51:6 12
77:9	learning	73:6,16,	TOQ·TO	15 22
lantar	37:12	19 76:2	light	-J,2J 50·/ 10
тартор		77:19	42:20	52.4,12,



MEETING WURTSMITH RE	ESTORATION AD	VISORY BOARD	) MEETING	August 21, 2024 Index: literallymap
14 54:2,9	52:20	132:19	74:17	20 77:22
55:1,3	53:9	10000		82:22
75 <b>:</b> 15	1	100se		85:4
93:12	LOCATIONS	62:11	M	98:13
1:+	51.1 53.5	lot		101:13
11terally	60.9 89.5	32:16	made	104:20
40.22	109.2,14	46:19	22:2	106:15
90.19	112.15	53 <b>:</b> 5	27:13	118:17
liters	113.15	54:23	28:21	121:15
75:15	130:13,	56:9,14	42:25	126:15
11.00	14,19	58 <b>:</b> 7	43:13,19	133:10
10.00	131:16,	59:21	57:4	134:3
42:20	20,24	63:21	65 <b>:</b> 15	135:2
111:10	132:5,9,	64:9 84:1	82:9	140:19
113:22,24	14,22,23	86:5	95:1,2	
143:8	133:5,8,	88:18	118:14	maker
live-	17 134:23	92:16	120:16	69:7
streaming	135:7,18	101:12	123:20	makes
5:6	136:1	105:23	130:8.9	28:7 53:1
	138:24	120:17	139:24	68:23
lived	139:3,6	133:21	141:18	94:10
95:11	long	199-21	143:2	113:2
Lively	40:8 44:7	lother	146:23	113.2
97:9,10,	68:18	101:11	140.25	making
14 145:25	70:9 11	lots	maintenance	69:13
146:1	70°J,±± 75°1	93:9	10:15	70:21
	79.12	107:4	51:15	71:12
living	02.16	10711	53:6,8	106:17
41:3 42:5	102.2	Loud	54:3,10,	131:17
lobby	115.12	94:11,15,	15,21	139:8
49:13	107.15	25 95:11,	55:1,4,11	мама
	127.15	15	98:12	36.7
local	130.19	lovelv	99:13	50.7
8:5 25:15	133:12,	146:25	100:1	manager
33:2	15,22	10025		80:1
36:21	136:24	low	majority	mandata
97:5	long-term	9:12	128:3	12.7
locally	19:13	30:23	make	43.7
44:11		112:3	11:23	143.22,23
	Longer	116:16	19:20	manner
locate	30:7	lower	20:16,18	47 <b>:</b> 17
59:4	83:22	LOWEL	21:18,24	Manufacturi
located	127:14	100.1	40:2	Mallulacturi
114:6	looked	109.1	42:13	ng
	58:19	lowest	64:18	20.05
location	62:12	15:24	65:23	80:25
12:12	128:1.12	luck	70:4.18	map
27:11		TUCK		19:21



### MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING with maps...methodology

52:10,19	90:9,13,	29:23	33:16	17:8
57:25	17 91:14,		36:13	19:22
59:1,6	19 92:10	matter	38:11	31:20
91:19	94:10	22:1	39:18	34:14
108:25	95:22	matters	45:23,25	38:5
109:1	102:22	65:13	47:8.24	45:23
134:16	108:18	142:3	48:1 2 4	47:3 25
136:23	112:9 10	-	6 73:8	93:5
140.9	14 17 20	may-	97.4	117.24
140.0	11 <i>1</i> ·2 <i>1</i>	79:4	00.01	110.01
maps	11102, 1,	MCLS	100.7	110.2
12:20	9,11,14, 17 115.0	67:13	102.24	140.25
15:18	1/ 115:2	68:21	103:24	140:25
26:7	118:5,7,	00121	104:2	143:15
108:23	11,13,19,	MDHHS	108:24	146:23
144:20	21 119:13	32:25	130:8	Memorial
	130:8	37:17	137:10	12:15
March	134:21	46:21	meetings	23:15
98:4	136:16,18	87:25	15:1 16:8	
Marcy	139:17,	maandana	22:3.25	memorialize
5:8	22,24		23:4	18:3
·	140:8,14	01.9	24:18	memorialize
Mark	146:18,19	means	31:10	d
5:24,25	Mark's	15:4	38:8	84:11
7:1,2	133:11	28:25	45:24	- -
11:9,10,	137:4	30:20	73:12	mention
11,12,21	137.1	112:10	81.10	9:11
12:16	marked	146:15	102.22	49:12
21:4,21	74:1		101.7	mentioned
26:3,14,	Marquette	media	104.7	17:18
18,20,25	15.2	46:11	120.15,22	23:4 31:9
27:5,7	10.2	meet	121.15	32:21
28:7,11	marsh	93:24	13,15	35:13
30:13,17,	21:25		141:24	77:20
23 31:1	54:5,6,	meeting	146:21,22	81.16
34:2 38:7	17,21,22	5:5,7,20	Megan	00.14
57:14,15,	55:5,6,	8:4 10:8	8:17	99.14 100.05
18,24	10,13	11:7,24		120.25
58:7,23	58:2 60:5	13:4	member	134:15
61:5,7,	75 <b>:</b> 24	14:15,20	7:24 8:2	139:2
22,24	107:6	15:13	9:16	met
62:6,17,	117:16	16:19	15:11	34:16
21,24	128:15	19:18	34:11	
83:3.4	132:25	22:25	37:16	metals
84:12.13		23:1 24:2	108:13,15	101:12
85:22	material	25:12,24	members	methodology
87:22 23	29:10	31:13,15	5:10 6:6	39:10
89:2	materials	32:21	7:1 15:14	125:2
			, • ± ± J • ± ±	



MEETING	Augus
WURTSMITH RESTORATION ADVISORY BOARD MEETINGdex:	methods

MEETING WURTSMITH RE	STORATION AD	VISORY BOARD	MEETINOdex: m	August 21, 2024 nethodsmunicipal
142:4	138:2	61:5	98:13	70:10
mothoda	milog	129:3	124:4	71:6 83:8
		134:22	manitanad	91:10
119.5	51.0,20	135:2		99:3,13,
mic	52·3,11	Minnian	125.12	20,25
97:13	94:12	MISSION	monitoring	100:5
Michaol	milestone	114:3,5,	13:14,18	108:15
6.16 17	18:7	24	27:22,24	122:14
25.6 8	milogtopog	misundersto	38:24	125:19
55.0,0	70.10	od	55 <b>:</b> 20	127:10
Michigan	08.25	129:25	90:6	140:16
5:1 6:21	90.25	mobile	98:15	
8:19,21,	military	1110DITE 02.12	116:1	moved
24 10:2	9:24	23.13	monitoriant	29:24
15:2	42:10	model	ion	102:19,20
36:6,23	mind	49:2	10n	movement
43:18,22	20.0	50:5,6	125.22	134:11
migrograma	40.12	65 <b>:</b> 4	month	
	40.12	73:15	10:4	moves
53·4,14, 10 FF:0	minds		18:15	40:3
18 55.9,	64:21	modeling	35:10	110:17
14	mino	50.14	78:12	moving
microlayer	05·15	mohawks	97:25	21:10,11
40:21	95.15	95 <b>:</b> 2		32:8
migrophono	minimal	molaggog	months	34:24
	94:12	105.6	16:15	42:3
140.20 21	minor	102.0	45:25	44:23
140.20,21	36:11	mold	46:17	56:7,14
microphones	50.11	28:22	49:8	71:21
5:11	minute	moment	56:16	90:4
mid	61:25	34:19	morning	113:5
15.22	minutes	39.25	34:17	123:9
10.22	25:12.19.	40.23	Nother	126:12
middle	25 31:11.	110.23	Mother	139:5
81:23	12.13	117.21	104.10	
midaes	44:23	money	motion	MPART
113:23	140:24	41:13,16	105:6	25:20
113.23	110.21	46:9	ma110	31:11
migrate	mirror	87:20	0.16	multi-
103:1	143:20	119:9	9·10 15·24	million
migrated	mismanageme	126:18,21	10·24 00·01	74:25
60:16	nt	127:10	22.21	
	143:22	142:10	ンダ・4 41・1つ	multiple
migration		money-wigo	41·13	19:4,5
107:4	missed		51:3,9	144:18
134:10	59:6 97:8	/ 4 • 10	52:16	municipal
mildlv	missing	monitor	54:1	30:24
4			66:20	



### MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Meters munitions..opinion

33:5	necessarily	140:13	obey	113:10
munitions	101:10	noth-	81:10	offsite
9:24	needed	104:23	objectives	29 <b>:</b> 6
Mungon	42:12	notido	13:5	onola
6.16 17	46:7	10.10	obligations	
0.10,17	141:1	19.10		95.0
35.0,8,9		20.5,6	125.3	123.20
mutually	negative	52:24	observation	ongoing
118:2	39:2	109:20	S	11:13
	128:5	123:15	145:21	48:8,9
Myconaut	Network	noticed		55:19
15:3	46:6	58:8	observed	
	141:6	50 0	139:25	online
N	111.0	November	obsolete	9:2 95:21
N	networks	16:11	104:19	96:10,15
	27:23	23:20	101017	114:25
nanograms	nicht	55:24	obtaining	127:24
51:6,11,		73:20	76:23	
14,23	84:14	98:2	oggogion	oops
52:4,12,	Noblis	99:16	occasion	55:14
14 54:2,	13:3,23	120:4	93:5	open
9,25 55:3	· ·	120 1	occasions	15:13
75:15	nobody's	number	93:5	
78:23	69:6	19:24		opened
02.10	non-afff	24:11	occur	43:7 48:6
93.12	58:2	59:8 93:5	121:15	opening
narrow	50.2	130:10	133:18	5 · 1 7
108:3	non-detects	140:23,24	occurs	5.11
	37:3	144:9	133.10	operable
narrower	men she lent		133.19	21:6
141:7	nonchalant	numbers	October	
national	41:10	58:25	13:10	operates
46:18	north	129:5,6,	14:14	24:1
106:20	52:15	15 145:1,	29:11	operation
100 10	91:11	3,16	35:23	35:11
natural	117:19	numerical	44:19	39:7
10:3	134:23		98:22	98:11
116:23	101 20	50:14	103:7	100:1
naturo	north/	numerically	10307	100.1
	south/east/	129:22	odor	operational
60.11	west		25:3	35:15
68:6,9,14	110:2		offico	ononationa
76:18,22		0		
89:11	nortnern		10:19	39:2 53:6
91:1,5	35:11	O'HARE	32:4 33:2	83:18
92:2,11,	T03:3	125:22	officials	99:13
13,22,24	note	143.44	8:6 97:5	opinion
104:16	10:14	OAEA		21:9
		37:7	offset	*



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Index: opinions..Paula

39:13	originates	oxida-	12:15	43:4
86:5	115:25	28:20	23:15	passed
opinions	Oscoda	oxidation	111:25	43:12
42:1	5:1 6:10	23:9,11	part	114:23
OPM	34:15,17	28:21	10:24	nagion
1000	35:9,16	30:14	13:24	Passion
122.3	41:9 44:2		15:23	57.10
opportuniti	46:8		17:2	past
es	142:12	P	23:19	9:20
121:1	00016		24:7	16:15
opportunity	01016	P-	63:11	59 <b>:</b> 20
14.19 20	24.15	67:8	68:2 74:8	70:22
14.19,20	OT16	75:14	81:19	83:5
120.1	26:3	D_ <b>TUAT</b>	84:7	103:23
139.4	115:25	0/.10	85:16,20	106:10
options	outcomod	94.10	89:16	127:10
33:8	21 · 01	P-THIS	93:1 98:4	nagta
order	JI · ZI	94:18	102:12	140.02
103:2 0	outfall	TO TH	113:25	14U·3
103.0,2	12:6	<b>P····</b> 5:2 0·1/	115:15	path
organic	outflow	J·Z J·I4 17·10	129:25	59 <b>:</b> 19
22:1 24:5	62.E	ゴ/・⊥ジ /0・1 ワ	130:21	77:15
129:1	02.3	40·⊥/ 100·10	135:12	nathwar
organics	outlet	1/6·10	136:15	2Q·12
24:5	115:14	⊥40・⊥⊿ 1/7・1	138:5	∠0・⊥∠ 72・1 2
21.2	outlook	14/•⊥	145:4	/ J • ⊥ J 77 • 1 ⊑
organisms	100:2	pace		//·±⊃
113:18,	100.2	106:12	participant	ØD•⊿ 112•00 01
19,22	outpaced	nackage	S	120,21
114:1	104:15	12.02	37:9	T3A:50
144:14	overflowed	11.10	participate	Paul
orientation	61:14	⊥4•⊥Z	d	139:2
73:8	07.73	paid	38:10	Daula
, , , , , , , , , , , , , , , , , , , ,	overly	40:17		10.00
original	127:25	nale	participati	エム・ムム つつ・1 ワ 1 O
18:20	override	82.17	on	∠3·⊥/,⊥ŏ
50:6	71:16	11.50	146:22	48.9, 12,
102:22	, 1 - 10	Palmer	partly	14,18,19
132:9	overturn	6:10	60:5	52:17,18,
originally	42:22	paper		21,23
9:21 14:2	overview	25:11	parts	56:19,23
103:0	9:22	104.10	34:4	57:12,14,
114:0 10	~	104.12	60:18	17,23
110.10	OWAA	pardon	116:12,16	58:6,10,
	6:16 35:7	104:21	133:22	24 59:7,
originated	owners	Park	party	10,13,15,
93:7	84:18	- 4-1-	41:25	23 60:1,8
1			-	


MEETING WURTSMITH RI	ESTORATION AD	OVISORY BOARD	D MEETING	August 21, 2024 Index: payingpiled
63:4,5,13	people	person	107:4	11:7,19
64:2,7,24	30:6	95:8,14	114:7,15,	16:25
66:1,5	42:19	122:17	20 115:3	20:18
68:4	44:1	123:12	5,18	66:8
71:23	59 <b>:</b> 18	146:20	116:6,18	99:12,19
73:5	60 <b>:</b> 7		117:9,10,	100:6
75:10,11,	63:24	personally	23 134:9	124:14
20 76:9,	70:24	31:10	140:1	126:13
10,16	71:11	perspective	141:6	127:25
77:18	74:22	141:23	142:20	
83:3	77:22	Potora	551114	pnases
84:12	78:2	07.10 15	PFHXS	16:18
85:8,12	95:10	97.10,15	52:2	19:8
87:22	104:25	Peters'	53:20	PHFXS
88:12	115:12	38:11	54:20	54:25
89:21		DFAS	55:15	nhonotia
90:11,15	people's	8:1 12:18	PFNA	
93:10	83:9 84:1	15:4 17:4	52:9	20.10
94:7	86:5	$18.21 \ 24$	53:22	95.22
95:20	perceived	10.21,24	55:3,15	photo
96:4,14,	14:11	21.25	94:18	84:25
16,18,25		22.25	DEOA	photog
97:17,25		23:5,12	FTOA 51.10 04	56:11
98:8	94.19	24.4	51.19,24	50.11
118:11,	95.11	20.23,23	53·10	pica
13,17,20	110.10	20.9, 11, 20.9, 11, 20.9, 20.9, 21, 20.9, 20	54.13,10	84:3
119:25	119.12	22,24	55.13	picked
123:16,	percentage	30.5	57.20,22	139:7
20,23	134:8	34.21	58.4	100 1
124:7,23	performance	37:5	$0/\cdot 11$	picture
125:5	24:7	46:6 18	94·10 124·16	63:24
130:15	21.1	40:0,10	134.10	93:14
131:12,14	perimeter	48:15 17	PFOS	141:23
132:2,8,	90:7,9,10	60:14 18	51:5,11	piece
18 134:21	period	22 24	53:4,13	93:24
135:11,	99:23	61:15	54:2,11	
14,24	100:8	67:9	55 <b>:</b> 8	Plerce's
136:3,6,8	121:16	83:13 16	57:19,21	134:23
137:1	124:20	20 22 24	58:4	piezometers
138:14		84:9	67:11	85:25
140:10	periods	86:15 16	78:22	ni garbadr
	111:15	88:6 8	116:12	FIGGIDACK 67.7
paying	peristaltic	90:20 25	134:16	127.2
58:9	38:22	91:12 20	PFXHS	101.0
peer		94:15 18	94:18	piled
87:8,14	persistent	96:1 R	21.10	62:15
	40.9	20 ±10	phase	



phase

MEET WURT	ING SMITH REST		/ISORY BOARD	MEETING	August 21, 2024 Index: pilesponds
pile	s	110:22	plans	21,22,24	98:3
56	:8	137:13,25	19:6	110:1,8	104:18
nili	ng Dl	ain	89:10	111:23	105:20
	119 PI • 0	ain 1/2·1/ 17	120:19	112:3,7,	106:15
0.5	• 9	142.14,1/	142:7	11,25	108:8
pilo	t pl	an	nlant	113:1,6,	114:13
15	:9	13:9,16	12.10	17 114:20	115:11
23	:16	14:16	12.10	115:23,25	117:3
29	:11	15:20	29·17 52·10	116:14	121:7
36	:13	16:24	53·12 54·7 10	134:16,	123:25
61	:19	17:2 18:8	54·7,⊥0, 02 FF·F 7	19,24	124:22
87	:19	19:2,5,10	23 55.5,/	135:9,21,	125:6,9
98	:16	29:4,8	100:4	24 136:10	134:17,23
nilo	Fa	32:13	105:10	138:1	135:2
25	•16	33:1,20		144:20	136:9,19
35	• 10	34:21	114:21		138:21
pin		45:17	115:21	plumes	139:24
31	:23	57:4 77:2	128:15	11:5,17	140:5,16
nine		85:14	133:2	15:21	
25	• )	98:3,9,21	plants	18:22	pointed
	• 2	99:1,8,	40:20,22	47:10,11	27:14
pipe	S	22,23	111:10	50:15	138:16
12	:5,7	100:7,21		58:13	pointing
34	:24	106:20		89:22	27:8
35	:4 54:5	107:9	/9:8 105.c	128:10	130:9
56	:19	121:9	105:6	130:11	• .
59	:4,16,	125:23	played	133:7,25	points
17	60:7,9	127:13,15	95:2,4	136:10,	34:18
63	:1	130:23	nlontu	19,21	124:3
75	:24	131:21,22		139:18	128:10
98	:15	139:11	00.5	144:22,25	133:10
99	:14	142:6	140.14	POF-	13/:4
10	0:3		plume	75:14	pollutant
10	5:9 PL	anet	15:18,22		78:6
11	5:11,13	142:19	16:3	POFS	nond
nlac	a pl	anned	26:4,7,15	75:14	
6:	2 33:5	58:1 64:5	27:2,8,13	point	ZO·IO E4·4 10
42	:2	114:11	37:22	11:23	16 10 21
56	:12 <b>n</b> 1	anning	51:5,6,19	21:22	10, 19, 21,
69	:1 PI	11.6	52:2,10	39:24	ZZ 55·Z, A 10 10
84	:19.21	16.10 10	76:22	46:23	±,⊥⊿,⊥⊃ 116·2 /
94	:2	10·10,10	89:24	47:7	⊥⊥U・3,4 117・16
12	7:14	110.0	90:7	62:16	⊥⊥/・⊥0 1 > 2 • 1
14	1:6	エエロ・ツ 1 2 0・1 7	92:21	67 <b>:</b> 5	100.1
1 14	± · 0	101·4 11	107:3	70:16,19,	ponds
plac	es	$\perp \angle \perp \cdot 4, \perp \perp,$	108:25	20 87:5	22:5,6
46	:8	ΤŬ	109:20,	94:10	54:5



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MEETING WURTSMITH RI	ESTORATION AD	VISORY BOARD	MEETING Index	August 21, 2024 : poopproductive
55:10	27:19	50:21	40:5	problems
133:13	73:12	108:16		113:18
	77:20,21	118:22	pretty	142:10
poop	84:4,19,		9:12	143:12
96:13	24 86:15,	present	31:25	
poor	16 105:19	6:9,15,	83:11	proceeding
41:7	115:7	20,23	110:10	14/:1
Poorly	145:10	/:2,4,6,	112:1	process
41:7		8,1U,1Z, 14 17 10	129.10	13:7,17
11.1		14,17,19 1 <i>1</i> :17	130.12,20	17:24
portion	20.20	$\pm 4 \cdot \pm 7$	prevent	18:8
43:14	90.5	31.10,14	37:25	19:9,19
51:25	113.10	39.23	106:21	33:10
66:22	power	109.25	provious	41:20,22
140:17	69:13	presentatio	23:4	43:9
portions	nro	n	60.21	65:11
108:25	100.16	9:21	120.12	67:2 68:1
100-25	100.10	15:2,3,11	120.12	70:25
position	pre-design	23:1,21,	previously	80:19
79:24	98:23	24 30:2	11:14	81:11
positioned	99:19	45:14	13:20	85:19
55:21	100:5,17,	48:11,13	33:4	87:9
55 11	18 101:7	72 <b>:</b> 17	35:25	91:16
possession	105:20	85:10	98 <b>:</b> 17	92:12,20
72:6,9	prealuding	120:24	132:13	99:20
possibiliti	64.11	130:8	principal	111:14
es	04.11	133:11		125:14,20
144:13	predates	144:21	59.1,0	126:5,9
	24:4 93:2		principals	128:2
possibility	predict	presentatio	39:5 42:8	130:17
21:1,20	50:15	10.7	prior	131:17,20
128:9	50 15	10.7	12:12	132:21
Possibly	preferred	presented	20:10	135:4,6,
28:3	18:2	34:25	43:23	13,18
mage and	preliminary	66:3	10 20	143:4,22
	23:23	123:16	priority	
80:9	63:18,20	progenting	20:7	prodaings
posters	66:8 74:1	Envag	47:14,16	111:0
49:13,15,		50.22	private	produce
17 134:25	preparation	press	83:14	57 <b>:</b> 25
nosting	32:17	46:24,25	84:9	produced
	prepare	47:4	96:2,9	
23.10	17:15	pressure		30·Z 110·2
potential	67:20	29:2	problem	110.2
10:11	nnonored	128:5	83:24	productive
11:20	prepared	120-5	113:8,11	46:1
19:2	31:5	pressures	119:17	



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETIN@dex: program..questions

program	proposed	106:11	purpose	87:24
9:24 23:3	19:2,5,9	nubli <i>a</i>	65:1,9	125:7
222222222	57:4		87:12	132:9
progress	87:13	$5 \cdot 4  6 \cdot 22$	119:11	
	99:1,8,	8:3 15:14	121:6	qualified
56:15	22,23	18:13		122:9,16
105:7	100:7	20:6	purposes	123:5
progressive		36:21,23	16:10	quality
91:15	proposing	57:4	39:16	37:18
	48:2 84:5	99:22,23	pursuing	75 <b>:</b> 19
project	prospects	100:7,8	35:24	78 <b>:</b> 18
9:22 23:3	123:3,7	119:2		
32:7		140:17	push	quarter
34:19	protecting	146:22	122:3	10:9,18
37:14,15	76:3	publication	pushed	31:23
61:19	protection	70:5	48:25	37:17
87:19	- 144:15			101:23
117:3		publish	pushing	105:12,14
121:11	prove	65:21	102:24	question
123:17	87:10,16,	68:20,23	139:15	11:9.11.
125:21,22	19	69:2,18	put	12 18:4
127:24	proven	76:18	- 18:16	22:12
130:20	39:10	77:3,13	23:15	25:10
projects	42:7	89:8	25:19	28:17 18
119:20		137:15	28:1	19 29:20
128:7	provide	138:10,19	33:20	33:24
12017	13:8	nubliched	59:5 65:3	34.13
promise	24:19		73:12	12.0 11
78:1	32:12	69.8	84:9	43·9,14 11·9 71·1
promises	34:5	09.0	85:25	44· <i>J</i> /4·4
41:14	36:15	publishing	109:1	/0·1/ 0E·0 06·1
11.11	86:14	76:13	116:24	05.9 00.1
promulgated	131:22	137:11	128:15	01.23
129:6	provided	138:19	120.12	94.7
properties	10:6	1	puts	95.20
83:12.14	13:22	92.11 21	131:21	100.11
84:6	32:2 12	02.14,21		105:9
0110	47:2	91.19	•	112:9
property	49:23	120.3	Q	124:8
36:3	108.23	pulled		126:3,14
47:12	121.10	29 <b>:</b> 15	Q&a	130:12
83:13	1/1.10		15:13	138:22
84:18	141·10		ΛΔΡΡ	144:5,18
104:4	providing	20.22	17:4 Q	questions
propose	33:20	33.2,4,0	18:20	6:1,2 8:2
84:7	49:21	pumped	27:10	14:22
120.20	מסמ	114:18	27·10	22:15
123.20	FKF		0.00	0



### MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEEdeMQuick..recommendations

			•	
26:7	14:14	rain	38:2	72:19
36:14	15:1,11,	39:21	roachog	101:1
37:14	14 16:8,	mo i do	126.20	102:22
38:1	22 17:8	74·2	130.20	received
44:24	18:13	110.2	read	12.6 15
48:12,13	19:18,22	110.10	43:4	15.0,15
57:10,12	20:5	140.10	95:24	10.0
78:4 82:8	22:17,25	raised	readily	31·23 27·17
96:14	23:4,20	26:6,7	44:16	57.17
106:7	33:16	raising	44.10	receives
108:13,15	34:11,14	9:3	ready	75 <b>:</b> 7
118:24	38:5,7		17:12	76 <b>:</b> 20
127:23	39:18	rankles	49:8	recent
128:24	40:10	87:21	real	21.8
130:4	41:11,23	rapid	10:7	42.20 22
134:5	42:6 44:8	128:21	14:10	42.20,22
143:19	45:25	120-21	19:19	recently
145:21	47:1,3,5,	rapidly	21:1	43:19
	19,21,25	56:14	34:10	46:14,25
quick	48:1,6,21	Ras	62:12	89:3
5:9 9:19	49:4,24	127:7.9	69:12	127:24
10:8,14	58:16	, , ,	97:3	recentive
17:11	59:3 63:5	ratio	140:17	141:15
18:4	64:11,25	57:20	140.17	111.12
21:24	66:3 69:3	58:4	realizing	receptor
22:13	70:9	rationale	104:11	73:12
34:10	73:11	133:4	reason	receptors
48:10	75:12		19:20	84:16
56:15	76:11	ratios	74:11	138:6
96:21	85:14	57:25	76:18	100 0
97:3	87:7 94:9	58:12,19	128:2	recognition
quickly	97:6	Ratliff	144:18	19:13
6:5 7:23	103:23	12:15	111 10	recognize
140:17	104:10	23:15	reasons	107:20
	108:13,	111:25	74:16	108:4
	15,24	127:24	89:9,14	
R	109:17	DAUGED	132:20	recognized
	117:24	RAUSER	reassembled	139:20
RAB	118:24	8:25 9:2,	117:1	recommend
5:9,20	119:2,3	/ 22:18		18:1
6:6,7	120:4,13	95:22	reassurance	57:24
7:1,24,25	123:21	96.6	82:24	91:4 92:5
8:2 9:16	128:3.24	140:8	reassure	136:19
10:8	130:5.7	re-check	82:20	
11:14,24	140:25	135:13		recommendat
12:17	146:23	reach	recall	
13:11		reach	23•⊥/	24.20



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETEN Gecommended..represent

				=
41:23	refer	46:24	82:11	repeat
50:19	18:20	51:8,9,22	romodios	97:12
128:14	61:17	53:1,3		103:24
139:8	75:13	60:14,22	19:3,4	108:20
	-	61:13	27:23	
recommended	reference	109:18	82:4	repeated
41:21	141:8	117:25	102:8	141:18
98:19,24	referred		105:19,21	repeatedly
99:19	36:6	released	107:15,25	106:25
101:2	<b>6</b> 7	60:15,25	108:2	
record	reflective	146:5	143:11,	report
5:14	137:20,21	releases	13,18	10:22
10:13,14,	refurbishin	47:4	remedy	13:6,8,
23 12:24	g		18:3	10,11,12,
18:2 24:6	35:24	releasing	19:11	20 14:13,
25:17		40:23	34:4	18,19,21
57:5	refused	relied	80:18	17:16
64:23	111:7	24:16	81:10	19:1
81.8 9	regard		82.23	49:2,7,10
01.0,9	28:22	rely	101.20	50:1,9,
97.1,12	138:22	131:5	102.12	13,17,24
100.0	143:4	remain	102.12	56:1 63:7
107.10		40:4	100.21,24	67:20
140:22	regrouped	43:12	107.14,10	69:8,21,
140.22	36:9		remember	23 70:3,
recording	regulated	remarks	5:10,14	4,5 73:25
5:6	67:12	5:17	104:1	74:1,9,
rogruitmont		146:11,12	140:24	10,15
122.24	regulating	reme-	141:24	78:3
122.24	67:19	102:4	romindor	88:15
recurring	regulations		5·0 22·1/	92:18
54:24	106:20	remedial	21.10	98:2
redid		9:23 10:5	34·10 27·11	100:23
122.24	related	12:18	37.11	121:18,19
122.24	26:21	17:25	48.11	124:10,14
redirect	31:24	56:5 65:5	remotely	138:10
72:4	32:13	99:1,8,9	7:17	141:10,
reduce	33:12	100:6	momorrod	13,17,21
37.25	36:3	102:4,10	removed	146:3
57.25	47:1,4	106:4	4 <i>2</i> •1	
reducing	relation	142:6	Removing	reporter
128:20	121:2	remediating	42:4	5 · 0
reevaluatin	relative	15:4	rented	reports
g	45:15	remediation	90:19	10:11,17
24:10,13,	63:22	105.12 16	mantin	represent
17	-	100.10,10	renting	11:25
	release	remedied	20.11	117:2
1				



WURTSMITH RESTORATION ADVISORY BOARD MEETING

August 21, 2024

Index: request..risk

145:17	41:12	41:8	revised	RIS
request	44:2	91:10	18:23	67:1
18:7 40:9	respect	100:22	88:15	risen
47:3	107:17	resumes	Rex	62:15
123:17	magnand	123:1	7:16,17	mi al-
141:18,20	70.16	rotontion	45:10,11	17.17 20
requested	70.10	54·4 10	DF	17.17,20
106.1	responds	16 19 22	88·11	23.4 40.2 19.1
100.1	57:3	55.2 4 11	00.11	50·11
required	response	55.2,4,11	RI	63.7 9
82:23	9:24	retired	8:1 11:3	11 15 17
requirement	34:3 6	116:21	13:24	11,13,17, 20 64:5
g	45:17	returned	14:9	20 04.5, 0 10 12
126:24	13 1 1 /	34:23	16:16	9,12,13, 1/ 16
127:4 21	responses	51.25	17:4,15	14,10 65:1 7 9
12/1/21	32:15	reversal	19:1,7	$12 \ 21 \ 24$
requires	responsible	43:24	26:20	13,21,24
42:25	87:17	review	27:14	10.15 10
research	92:7	7:23	32:17,22	12,15,10,
15:3,5		13:23	40:11	21,22,2J 67:5 17
	responsiven	17:9 18:9	41:2,3	07.5, 17,
researching	ess	26:12	48:15,17	$\begin{array}{c} 25 \\ 6 \\ 7 \\ 10 \\ 7 \\ \end{array}$
104:12	57:3	32:22,25	49:2,7,10	60,7,12,25
reserve	rest	37:22	50:1,9,	09.9, 22, 23, 71.5
29:9	11:2	41:20	13,17,22	2371.3
magida	12:17	56:3	55:25	72.13,20
10.7	14:2	87:8,9	56:1	$73.2, \pm 3$ 74.14, 20
40.7	15:13	141:8,10,	66:22	75.5 6
residential	29:16	12,13,17,	69:21,23	76:13 21
37:1	34:10	19,21	84:11	25 77:9
88:1,4,7	69:10	142:25	89:16	15 78:3
89:12,14	82:16		90:25	82:9 16
93:15	119:22	reviewed	92:14	21 27
resides	Postoration	32:1,12	98:1,2	84:16 17
40:21		8/:14	99:6	24 109:4
10.21	J. +	131:19	110:4	16 111:14
resin	result	reviewing	113:20	113:12
34:25	39:22	13:8	123:22,23	13 22
resistance	resulting	33:20	124:9,14	117:5 8
40:6,9	41:17	46:1	125:6	10 25
	11 1 1 /	84:15	135:17	118:3
resolution	results	123:2	139:20	123:22 23
32:10	10:19	rouiowa	rigor	130:14
41:18	11:6	22·11	39:14	131:2 3 4
resources	12:20	101.0 00	40:15	132:2
10:3 32:4	19:7 37:2	121·22	41:2,20	133:16
1		101.020	· -	



MEETING WURTSMITH RI	ESTORATION A	DVISORY BOARD	MEETING Inde	August 21, 2024 ex: riverschedule
137:11,	roll	98:10	131:19,24	22 <b>:</b> 5
15,18	124:14	132:25	132:9	26:13
138:4,13,	malla	140:15	133:17	27:20,22
14,19,20		munoff	134:22	28:2
142:5	99.4	20:01		37:1,6
145:18	Romer	39.21	sampred	38:18,21
	9:3,7,10	runs	27.22	39:6,7,9,
12.0	room	125:4	37·2	14,24
12.0	71.12	*11DW3V	02.3,5	44:10
	95.10	52.15	/4·10	48:22
54:4 60:6	1/5.00	52.10	115:17	60:14
74:22	145.25		116:17	85:23
75:16,23	140.10	S	samples	89:15
76:6	rotate		63:23	111:7
107:7	15:23		66:3	113:16
112:21		S-P-A-N-I-	72:21	115:8
113:3,5	roughly		73:22,23	116:6 15
115:6	51:5	141:5	76:24	119:4
116:7,11	round	Sable	104:13	120:6
133:8,20	11:4	6:14 12:8	109:2.15.	135.16
135:21	36:25	21:12	21 23	126.20 25
136:11,	44:20	54:4 60:6	111:1 12	120.0
21,24	5404	74:22	16 112:2	139.9
road	RSOS	75:16,23	12 23	San
95:3	67:13	76:6	116:13 18	122:12
	rug	78:10	117.4 8	gand
Rob	82:14,21	112:21	9 14 15	83·10 13
22:18,20	~	113:5	20 23	84.2 4
ROD		115:6	118.2	95.2
19:2 5 10	75:18,23	116:11	110.12 22	95.2
32:5	/8·18 01·C 10	_	120.10	sat
57:1 2	81:6,18	safe	121.6 7	93:3
79:11 12	rules	93:13	131·0,7, 9 0	satellite
80:14	79 <b>:</b> 8	salmon	0,9 120.5 C	36:8
82:3	ruling	75 <b>:</b> 1	122.21	5010
84:15	12.12		124.10	saturated
07·15 23	43.13	sam-	134.19	51:10
92.13,23	run	11:18	130.14,22	scale
125.10	23:16	sample	13/.7, 23,	38:24
123.19	29:13	28:8	25 138:24	39:7 11
RODS	69:10	38:25	144·9,10,	JJ - 1   ±±
19:6	70:9	40:2	ZI 145:1	scare
24:11	110:21	59:12	sampling	122:8
27:4 82:3	running	84:22	10:10,12,	schedule
Roger	11.10	117:17,18	18,25	14:19
8:11	₩⊥・⊥∠ 70・1 2	119:12	11:4,18	16:9
100.12	/0.13	130:19	15:16	24:18
122.23	93.9			21:10



### MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETINGIndex: scheduled..settle

57:9,13	77:24	sections	seepage	131:16
97:17,20,	94:7,9	21:10	12:11	separate
23 119:19	96:11	Secure	53:12	121.11
scheduled	SCOTTIS	36.1	62:25	121.11
22.5	42.22	30.1	gooning	September
23.3	42.22	Security	116.11	48:3
schedules	43.10,24	12:1 23:2	110.11	103:7,10,
96:19	screen	31:15	seeps	11
scheduling	28:18	godiment	115:24	sentia
10.12	garooning	15.15	gogmonta	95.10
27.9	52·2 6 11	22.5 6	10.25	86.2
110.17	52.3,0,11	22.5,0	10.20	06.2
119.17	$53 \cdot 17, 20,$	39.14,15	select	90.3,9
Schulz	23 54.11,	40.3,7	131:8	142.21,22
7:13,14	13,14,20	55:8	133:20	serve
45:8,9	55:9,14,	59:10,11,	~~]~~+~d	128:20
	16 144:8,	12,16	selected	<b>a</b>
science	11,17,24	60:9	130:22	Service
40:10	145:1,2,7	61:1,10	132:15	6:25
122:21	screens	109:2,15	133:5,9	Services
142:4	14:6	111:16	135:18	8:20,22,
science-	91:25	112:2,12	semi-	24
based	<u> </u>	113:16	volatile	
40:12	Seal	115:8	24:5	session
	138:25	117:4,13,		14:17,21,
scientific	search	15,17,20	senate	25 17:3,
39:5,13	87:19	119:15	11:25	18 23:20
41:2,4	0, 19	130:10,19	97:9	59:2
42:8	season	132:6,21	Senator	64:10
125:2	40:25	133:4,6	38:11	108:19
scientific-	44:7,10,	135:6,16	97:10 14	got
based	18	136:14	J / 10 / 11	17:22
41:11	goat	137:7,25	send	23:14
11.11	120.16	138:24	48:4	30.25
scientists	140.20	139:9,14	72:10	40.2
89:13	140.20	144:8,10	118:5,21	40.2
SCODE	secondary		122:10,22	41·10 FF·16
11.3	21:25	sediments	Songo	55.10
32.18 24	22:9	111:9	19.20	57.20
JZ:10,24	gograf	113:17,23	21.10	82.10
40.11	71.05	115:17	21·10 20·7 E2·1	93:24
123.0	11.20	134:12	20·/ 23·1	103:1
scoping	section	139:17	00.43	123:1
41:7	80:1	145:9,14	82:22	124:5
Saott	133:17	500D	sensitive	144:6
5COLL 7.11 10	134:2	63.03 Beeb	126:3	settle
/・⊥⊥,⊥∠	136:24	03·23 117·10		67:18
45.0,/	141:6	TT / • TO	sensors	-



MEETING WURTSMITH RI	ESTORATION AL	OVISORY BOARD	D MEETING	August 21, 2024 Index: sewerslide
sewer	shortsighte	SI	74:21	137:21,22
35:4	dness	27:12	145:13	gitag
115:5	41:1	sic	simple	17:25
shallow	shot	75:14	103:3	18:21 24
15:22	87:16	94:18	142:15 18	19:3 12
40:7	0, 10	101:11	112 10,10	16.17
51:14	show	107:23	simply	20:3 6
52:8 13	12:13	107-25	13:21	24:19
25 53:3	15:24	side	15:20	27:21 23
91:23	16:1 47:9	20:21	single	80:2
96.2 8	89:24	52:15	19:4	101.17
50.2,0	113:3,4	60:4,10	39:24	110.8
shapes	119:14	77:10	131:16	120.25
135:9	120:5	85:10,15,	134:2	120.23
chare	136:6,10	23 86:18	194.2	sitting
12.17	showed	87:3,25	sink	71:12
12.10	47·10	91:11	145:12,15	104:10
16.00	47.10	94:3,21	eir	aitustion
17.0 0	59.8	134:23,24	79.23	
17.8,9	110.10	142:16,20	129.23	120.25
sharing	showing		120.24	situations
120:23	15:19	sides	sit	108:5
abod	100:15	88:9	95:4,16	aire
40.05	105:10	sign	141:23	04·12
40.25	132:22	12:23	aito	94·15 106·10
sheet	134:22	41:24	19:21	120.10
75 <b>:</b> 13	aboum	74:10	20:9.20	skepticism
shifting	11·14	gionature	24:3	94:5
21:20	11·14 01·15	95.10	25:20	slab
21.20	109.24	86.3	28:4	56:24
shock	109.24	00.2	31:11 19	50.21
104:6	127.5	signed	46:15	slide
shore	shows	32:6 57:2	49:2	9:18 11:8
40:19	15 <b>:</b> 17	92 <b>:</b> 15	50.5 6	14:23,24
94:11	39:13	99 <b>:</b> 12	51.18	16:14
111:16	47:10	107:19	52.15	18:19
111.10	84:16	aignifigant	52.15	22:23,24
shoreline	88:1,25		53.7,9,	31:3,7
39:22	91:20	10.0F	10,22	32:20
77:10	99 <b>:</b> 17	18.25	05.3,4	47:22
88:4	109:2	similar	/ 3 · 15	48:9
110:16,24	110:4	18:11	/9:/	51:3,19
112:7	134:24	38:23	98:TA	52:2,9,16
140:5	•	39:14	100:11	53:16
shortgoming	shut	43:23	108:1	54:1,13
12.14	69:10	51:20	109:4	55:8,16
13.10	72:1	52:12	116:8	56:4,24
			132:11	- ,



### MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETINGIndex: slides..standards

63:6 99:3	53:4,14,	58:2	specific	134:2
100:2,13,	17 58:25	86:15,16	43:10,14	SDD
15 109:5,	59:12,17	144:23	72:4	101.13
9 111:24	60:10,12,	145:8	specificall	121.12
112:20	13,15,23	south	v	square
114:1	61:1,9	54:6 17	22:20	51:5,20
115:19	62:9	22 55:5 6	88:22	52:3,11
slides	85:23	91:9	00.22	SS021
47:8	131:8	111:25	speed	24:15
52:24	144:7,9,	112:23	104:8,11,	
97:23	21 145:1	110 01	15	SS057
108:12	soils	southern	spell	24:3,14
109:7	144:23	18:25	140:21	SS06
118:6 14	145:4 5	55:22		24:15
123:16	13	90:12	spent	<b>4400</b>
123110	19	southwest	15:14	SS08 04.1F
slip	solicit	36:3	104:11,12	24:15
35:2	16:22	51:25	spirit	SS71
slow	solution		91:5 92:6	53:7,22
105:6	29:2,16	sovereign		ataff
	33:4 42:2	79:5,15	splasning	31.16
small		80:4,9	//•/	32.3 17
17:10	solutions	space	split	32.3
34:25	33:9	36:10	10:24	38:11
84:3	solvents	42:5	119:12	50.11
smaller	114:12	Gnaniala	134:18	staffers
17:6	aort		splits	11:25
38:24	21.17	141.5,4,5	119:14	31:20
52:3,10	104.10	spatially		32:25
gmattering	107.21	16:4	spoils	stage
88:6	114:23	speak	117:2	107:16
00.0	119:19	5:10	spoke	
smell	138:2	71:18,19	130:7	stages
25:4	100 1	78:20	en e 1- e n	12.2
smells	source		spoken	stakeholder
25:5	21:25	speaking	103.23	/rab
	22:9	71:14	sporting	9:14
snapshot	66:13	Special	74:19	gtandalono
39:25	88:8 92:8	35:17	Sporte	50.8
snickers	94:20,21,	apogioligh	35:19	50.0
5:22	22 115:7		55.17	standard
aoi l	128:1	22.12	Sportsmens	43:20,22,
11.4	144:23	specialty	37:6	24 76:2
1 1 · · · · · · · · · · · · · · · · · ·	145:5,13	131:3	spot	79 <b>:</b> 2
10.1	sources	species	78:5,6	138:12
52.16	34:21	78:10	133:19,20	standards
			•	



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Index: stands..stored

43:17	104:8	20:7	26:5,23	122:5,13,
75:19	123:10	80:16,17	27:2,6,	18 123:18
78:19,20	<b>*</b> ***	85:13	17,21	124:15,23
79:6,8		120:24	28:3,10,	126:7,8,
81:25	5·14 0·5	137:18	15 29:1,	20 128:11
90:21	10.9	atotuto	10,19,25	129:5,14,
93:25	20.14	106·2 0	30:9,11	19,22
gtandg	35.18	19	31:3,8	130:1,7,
41.20	40.11	19	32:21	15,21
41.20	40.11	stay	47:9,22	131:11
star	67.13	55:23	49:23	132:4
52:19	72.24	steelhead	57:9,11	136:12
start	80.2 16	74:19.25	58:1	137:3
10:3	81:1	/1 19/20	60:13,19,	138:17
12:24	89.2 6	steep	22,25	139:10
16:24	93:8 12	128:22	61:4,15	140:10,13
17:12	33.0,12, 18 96.1 7	step	63:12,13,	146:13
25:16	97:4 5 6	_ 17:23	14 64:1,3	Stovels
51:4 56:3	116:1 3	65:10	65:23	96:18
68:19	5 16 21	66:21	66:7 67:7	0.10
98:5,21	117:11 13	92:20	68:17	Steven
99:21	118:1	98:23	69:19	6:7
100:4,9	119:9 16		71:11	stick
101:5	18 20	step-wise	72:7,10,	34:11
103:5	120:5 8	91.18	14,19	44:22
105:11	120.070	stepped	73:1,14,	
108:7	state's	91:10	17 85:3,	stone's
111:3	117:12	stenning	6,17,21	90:19
123:18	138:3	91:12	86:10,18	stop
	state-	91.12	87:4	35:3
started	established	steps	91:8,15	47:18
$5 \cdot 24$	43:17	37:24	92:19	69:24
24.10	atatad	Steve	96:20,23	106:21
67.10 14	Alic	5:18,22	97:18,19,	124:2
07.2 08.0	41.0	6:9 9:18	22	125:23
107.18	statement	11:10,16,	100:11,	128:6
119.2	70:16	22 18:5,	13,17,20	stopping
126.9	123:20	16,19	101:1,10,	47:14.15
130:16	states	19:15	21 102:1,	92:4
132:19	79:16	20:13,15,	7,11,14	22 -
140:7	81:3	25 21:19,	103:4,13,	stops
	119:8	23 22:11,	10 105:8,	40:5
starting		23 23:19	10 100:0,	storage
12:13	static	24:24	110.5 0	53:24
18:8 44:7	39:19	25:2,9,	$\perp \perp \heartsuit \cdot \circlearrowright, \circlearrowright,$	atored
98:4	status	10,11,15	101.00 05	E2.10
1			141.45	02 · TO



MEETING WURTSMITH R	ESTORATION AD	VISORY BOARD	MEETING Inc	August 21, 2024 lex: stormsystem
storm	studies	10:10	44:9	75 <b>:</b> 18
12:6	41:7	37:18	115:13	110:15
34:22	45:18		124:24,25	115:24
35:4	95 <b>:</b> 25	subject	<b>a</b> . 1.	130:11
60:17	96:7	74:1	Sunday	131:7
61:18	•!	submit	47:25	132:21,24
62:1	Studios	84:25	super	133:2,6,7
115:5	5:6		23:8,11	134:11,22
	study		28:20	135:16
story	11:13	13:23	30:14	139:19
51:20	15:9	14:13	<i>с</i> ,	140:2
52:12	17:23	substandard	superfund	144:16
straight	18:1	143:24	8:15	145:6 13
143:5	19:2.7		65:13	113.0,13
110 0	29:11	substantial	80:1,2	surmise
strange	37:15	119:10	supplied	66:18
104:2	40:13 17	substitute	46:2 47:1	surrounding
115:18	41:5 14	75 <b>:</b> 3		38:25
strategic	15 16		supplies	40.14 21
143:12	13,10 65:11 15	sufficientl	30:24	92.10
110 12	67.4	У	supply	03.12
stratigraph	60.11	128:6	42:21	04.10
У	71.6	suggest		Sutton
90:1	71.0	73:25	support	7:15
Straver	79.10	75 <b>:</b> 6	66:25	SUCCE
6:13	81.7	83:11	67:5 87:9	24.6
0.12	85:20	_	124:4,9	24.0
streams	89:4	suggested	125:17	Swamp
22:6	95:25	138:2	136:12	63:1
Street	96:7	suggestions	supported	<b>G</b> 110.27
90:18	98:7,16	41:11	43:6	outin
111.2	99:7,14	42:6	13.0	84.13
114.2	106:23	120:15 19	supports	sweat
strenuous	studving	120 10,19	71:21	65:2
94:2	99:15	suggests	supposed	104:14
strictly	<i>yy</i> <u>1</u> 0	42:15	14:7	a
27·2	stuff	sulphur	102.9	swittly
27.5	21:10,11	25:6	110.5	41:13
Strike	24:1 28:8	23:0	119.5	swim
35:12	59:20	summary	surface	115:12
atroko	74:21	10:8	38:22	
$74 \cdot 17$	77:10	50:25	39:15	Symptom
/ ユ・エ /	107:2	55:18	40:4,7,20	83.6
strong	108:3	57 <b>:</b> 3	51:7,10,	syringe
120:14	Stuntobook	gummer	21 54:1,3	38:21
atruaturea	6.04	8.10 17.0	59:10,16,	a
116.95	0.24	25.10 21	25 60:12	system
110.23	sub-slab	JJ•IU,ZI	61:1	12:4,6,



MEETING WURTSMITH RI	ESTORATION AD	VISORY BOARD	DMEETINOdex: sy	August 21, 2024 ystem'sthickness
10,14,25	takes	127:12,18	144:4	22:9
13:4,5,	30:18	142:9	h	36:13
14,17,18	68:18	143:14		38:17
14:2 23:8	99:3	+ - <b>]  </b>	14:17,21	127:15
24:8,22		talks	32:17	
25:13	taking	33:7	39:18	terminate
29:13,17	28:11	93:10	108:19	98:16
34:20,22	40:22	tank	131:18,21	terms
43:2	66:21	96:13	technicalit	46:8
56:16	101:4	+ <b> </b>	У	+
98:10,12,	104:13		80:22	terrestrial
13 100:1.	143:24	96.3,9		S
9 101:13	talk	tap	technologie	22:8
103:3,6	32:22	29:11	S	terrific
105:2	35:16		23:1,22	134:14
112:1	75:14,17		technology	137:9
114:5 15	86:5	28.10,19	23:2,3,11	townifi coll
115:3	122:11	29.3,18	28:21	terrificall
126:17		tasty	29:14	У 120.10
142:22	talked	77:10	128:8	130:10
112.22	9:19 11:1	+		tested
system's	44:6	2E.JE	teeth	38:23
101:9	56:25	35.25	31:1	93:12
systems	63:10	team	telling	94:17
33:5	65 <b>:</b> 17	20:10	69:4,16	+ +
103:16	85:14	37:16	75:21	testing
142:21	98 <b>:</b> 17	48:25	78:22	35:20
112.21	99 <b>:</b> 5	71:25	95 <b>:</b> 5	38:23
	120:25	88:13	102:3	39:1,14
Т	127:5	98:24	122:15	93:16,18
	129:6	101:2		94:14
table	talking	106:1	tells	134:13
51:21	15:15	127:16,17	142:8	that'd
90:23	26:23.25	128:14	temporarily	6:12
92:1	27:9	131:14,	53:10	thoma
110:6 15	28:14	18,21	<b>.</b>	
19 111:2	50:11 16	140:20	cemporary	54.24
120:16	60:1 2	-	53:24	Theodorovic
120.10	69:6	Teams	87:14	h
tables	71:10	48:5	ten	8:23
12:19	73:14	tech	71:2	theory
tabs	83:6	14:25	toponta	07.00
15:6	00.12	17:3,18		o/•∠U
	102·15	23:20	TO·ZT	thesis
tail	100.11	59 <b>:</b> 2	tenth	87:11
83:21	エレジ・エエ 1 つ1・つ	64:10	110:10	thicknood
87:18	104·15	130:8	torm	51·10
1	T74.TO		CETW	71.10



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Index: thing..transmit

thing	77:21	81:7,11	tomorrow	totally
16:8	86:7	93:4	10:16	94:1
42:6,19	108:1	102:8,14	16:20	t an all
43:25		103:2	32:21	tougn
52:23	three-month	104:11,		122:9
55:20	124:6	12,17,20,	tonight	tour
58:14,18	three-	21 111:15	5:11,23	12:2
64:19	quarters	118:23	44:6,25	23:24
68:18	124:21	120:23	50:21	38:12
70:17	theory	127:19	5/:1 9/:/	46:11,13
79:21	01.02	130:23	142:1	tours
80:24	01.23	132:10	143:13,	
83:5 91:4	90.20	142:10	17,21	46.10
115:11	136:23		146:23	tower
123:15	Tim	timeline	tonight's	35:15,16
126:2	6:12	100:10	5:7 7:23	torm
142:11	34:15,16	102:23	8:4 48:11	70.14
144:19	103:21,22	105:9,12	97:4	70.14
145:9	106:5,7	108:10		township
10 9	1. J	timelines	tons	6:11,14
things	time	96:17,21	40:22	34:15,17
13:19	6:3 8:5	97:23	81:2	36:1,7
16:15	9:16		93:18	tracking
32:8	14:10	timely	Tony	1E.DE
35:13	15:14	47:17	141:3,4	15.25
51:2	17:2,9	times	144:1	20.12
56:14	20:10	35:21		trailers
57:8	22:14	54:16	tool	104:1
58:20	29:6	111:19	15:17	training
67:21	33:16	126:11	16:7	
72:1 77:2	34:12,24		tools	02.10
81:22	39:24,25	timing	58:18	03.19
93:17	40:1	81:12		$115\cdot 20,$
121:4,14	41:13,16	107:13,24	top	22,23
143:5,6,	42:10	today	30:1	transducer
10 144:17	44:3,15,	7:16	109:1	88:19
145:19	22,24	49:11	110:9,15	89:4 98:1
thinking	46:11	85:1	111:2	tranaduaara
26.10	48:4,14,	104:18	129:16	
20.10	23 59:21	118:22	topic	95·21,25
third-party	61:3		- 121:3	00.24
13:3	62:4,12	told	<b></b>	124.12
thought	67:11	72:15,16	topics	transition
21:5	68:17,18	103:8	35:5	98:11
21.17	70:11	129:1	Toss	trangmi+
50.24	73:10,22	tolerated	128:10	12:16
59:1	77 <b>:</b> 25	106:12		12.10



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETIN@ndex: transport..updates

transport	trout	27:10	understandi	70:23
50:14	74:20,23	50:6	ng	
	<b>h</b>	87:24	15:21	
	TOUE	132:9	67:8,9	35.15
88.8	12.5	<b>TT</b>	85:16	42.15
treat	Tucker's	Un-hun	130:24	131.10
39:2,6	63:1	25:9		unvoiced
trootmont	Tuggon	29:19	understands	69:8
	100501	52:21	33:14	uncoming
12.4, 10,	42.21	57:23	understood	22.01
$14  13 \cdot 14$	43.10	58:6	68:4	33.41
23.10	turn	59:23	134:4	38.9
29:13,17	5:16	75:20	139:22	87:24
34:25	turnamaund	76:16		109:10
38:13	17.11	85:12	undetectabl	update
53:11		90:15	e	7:25
54:6,17,	turned	135:11	78:25	9:17,19
23 55:5,7	63:1	ultimately	unfavorable	11:7
56:15	141:21	69:5	82:15	12:22
100:4	<b>b</b>	89:19		22:24
101:13	curns	113:25	Unn-unh	31:5,9
105:10	05.0	110 10	59:13,15	34:15
111:25	107:9	unacceptabl	unit	35:7
114:5,15,	two-part	e	21:6	36:18,25
21 115:3,	144:5	80:5,6	28:23	37:7.16
21 128:15	two tioned	82:19	133:12,23	38:6.15
133:1	42.0	underneath	134:3	44:5
treatments	43.0	82:14		45:1.3.5.
21:13 15	type	02 11	units	11 13 21
16	14:16	understand	23:13	47:19 21
10	15:8 70:7	25:1,21	29:5,7,8	48:16 17
trees	111:22	27:7	133:3,15,	50:5
40:21	142:25	44:12,18	21	67:22
tremendous	turned	61:15	unlike	120:22
126:19		65:16	87:13	120-25
	$\pm 44 \cdot \pm 7$	68:17,19		updated
triangles		76:22	unmitigated	19:22
109:13	U	77:17	105:5	64:5
triggered		78:17	unmute	121:1
22:4	TT (2	81:15	9:4,8	undates
		86:4	22:16	7:25 8:1
trillion	0.1, 20	103:19	95:23	9:14 16
34:4	9.T0 9T:7	105:4,5		10:6
60:18	97.9	121:25	unreasonabl	10·0 20·1 <i>1</i>
81:19	UFP	124:2,8	e	22·⊥4 21·11
115:16	17:4,7	125:10	42:7	36, JU JE
116:12,17	18:20	135:5,20	unspoken	20·20,23 AA·22
			—	77. //



### MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Mdex: upgrades...wanted

45:7,9	80:13	vegetation	29:3,18	volume
47:23	82:19	10:2 22:8	view	9:11
upgrades	129:12,23	144:14	15:20	39:16
98:13	140:9	vehicle	23:25	
J0113	Van	35:20	68:11	м
upper	15:12	55.20	98:22	<u> </u>
117:15	20:21	vent	137:8 18	
upset	20 21	109:22	10, 0,10	wagging
94:20	40:19	116:7	virtual	87:18
143:20	42:16	134:19	48:4	wait
	44:8 14	vented	146:7	64:16
uptake	45:15 19	111:18	virtually	67:18
39:16	54:3 12		5:15 9:6	69:1 77:3
67:16,19	55:10 22	venting	22:13,16	86:20
144:13	75:15 23	110:23	97:7	
urge	78:11	111:4	134:8	waited
117:25	83.16 24	112:7,25	146:20	132:20
146:20	85.11 15	113:6,14,		135:15
	87:25	16 117:21	visit	waiting
US-23	88:2 5	130:11	42:20	32:14
88:9,10	89:24	139:18	visual	67:24
91:20	0 <i>4</i> ·3 11	vents	25:3	
useless	112:17	110:15,	108:16	walk
100:25	141:7	16,17		62:13
138:21	142.16	111:20,23	visualizati	82:21
	20 23		on	95:5,6
	20,23	verbally	15:17	127:6
30.2	vapor	81:17	49:20	walked
utilizing	10:5	versus	58:17	12:5
46:2 86:8	11:12,14	20:9 25:6	visualize	127:6
	31:23		58:16	
	33:11,14		VOC	walking
V	37:16	15.21	11.5	59.19,20
	varies	00:24	11.2	$\perp \angle / \cdot \perp \angle$
vague	39:20	90.24	20·0,12 100·05	Walton
41:14	57 20	110.3	120.25	8:11
valid	variety	112.4	vocals	122:23
41:10	40:16	140.1,0	9:12	wanted
93:16	VAS	vertically	VOCS	
127:3	27:11	16:4	24.4 5	26.25
12, 5		VT	27.7,5 26:24	27.11
validated	vastly	31·0 <i>4</i>	20.24	91.20
48:24	57:22	32.24	2/·J 101·15	04·20 QE·1
validating	Vaughn	37.25	TOT • T 2	106.15
100:22	7:16,17	57.25	volatile	100.10
	45:10,11	Victoria	114:22	T00.0
values	·	28:16,19	129:1	



# MEETING

WURTSMITH RESTORATION ADVISORY BOARD MEETING

August 21, 2024 Index: warms..Winn

warms	59:10,16	95:22	wide	100:13,
17:13	60 <b>:</b> 17	week	61:21	17,20
warrant	61:1,10	56:2	wider	101:1,10,
11:18	62:1,15	119:13	40:16	21 102:1,
11 10	75:18,19	123:10	10 10	7,11,14
washed	76:5		Willis	103:4,13,
61:19	89:20	weeks	5:17,18,	17 105:18
washer	90:21,23	31:13	22 6:7,9	108:11
96:11	92:1	122:25	9:17,18	118:5,8,
	95:1,2	weight	11:10,16,	16 121:25
wasted	96:2,9,12	76:20	22 18:5,	122:5,13
142:10,11	110:6,14,	11	16,19	123:18
wastewater	15,19	wells	20:13,15,	126:8,20
12:10	111:2,7	13:14,18,	25 21:19	128:11
53:11	114:17	25 14:3	22:11,22,	129:5,14,
54:6,17,	115:24	28:2	23 23:19	19,22
23 55:5,6	116:5,15,	29:12	25:2,9,	130:1,15,
100:3	24 125:25	33:5	11,15	21 137:3
105:10	130:12	38:24	26:5,23	140:13
115:21	131:7	48:23	27:2,6,	146:13
128:14	132:21,24	56:21	17,21	wind
133:1	133:2,6,	88:1,4,7	28:3,10,	39:20
watchad	8,13,14	89:3 90:6	15 29:1,	83:8
	134:11,22	91:22,23,	10,19,25	
104.0	135:16	25 94:15	30:9,11	Winn
watching	136:20	96:2,9	31:3	7:18,19
119:4	138:23	107:5	34:20	25:10,12,
water	139:19	114:18	47:21,22	18,21,24
12:6	141:5	116:2	57:11	26:2
21:14	144:15,16	128:4,6,	60:13,19,	33:24
23:8 11	145:6,13,	16 131:6	22,25	34:1
25:5	20	Wendi	61:4	45:12,13
28:20	wavs	145:24	63:14	63:5,17
29:16	49:19.21	woat	64:1,3	64:23
30:14 24	58:16,21	00.11	67:7	75:10,12,
32:3	92:16	90.11	69:19	21 78:21
34:3 22		wet all	71:11	79:1,17,
37:6	weather	61:3	72:7,10,	20 82:25
38:17 18	17:13	whatnot	14,19	85:9,13
21 22 24	web	83:9	73:1,14,	86:1,16,
39:4 9 18	25:20	113:24	17 85:3,	22 96:16,
40:3.5.23	31:11		6,21	22
42:21	11 - J J -	whichever	86:10,18	100:11,
44:13	weanesaay	83:8	87:4	14,18,24
51:21	5.2	whirlpool	91:8,15	101:6,18,
54:1 2	Weegar	116:7.8	96:20,23	22 102:2,
54.72		,,0	97:19,22	9,13,19



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## MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETINGIndex: winter..yesterday

103:7,14,	70:9,10,	119:8	19:10	122:2
18 105:8,	12 85:13	126:5	23:6	124:17,21
25	87:24	131:20	24:11	126:20
	89:5 91:3		35:9	127:9,13
winter	93:15	world	42:24	
44:9	100:21	65:21	43:22	years
105:7	117:12	124:15	47:5	15:20
wire	120:17,19	134:15	70:13	27:6 36:5
78:7	121:9	worms	71:22	49:14
Wiggongin	122:12,	113:23	126:23,25	50:3
	17,19	worry	127:3,15,	60:21
90.1,0	124:11,12	01.01	21 146:16	62:13
wonderful	125:6	01.71		65:2,12,
93:22	126:16	worst	Wusterbarth	13 70:24
wondering	127:16	111:17	5:21	71:2
18·10	130:22	112:6	7:20,21	73:20
26.11	136:9	wran	24:24	78:14
110.3	138:18	17.15	25:8	83:20,25
141.16	142:1,6	17.10	45:20,22	94:16
141.10	146:14,16	write	71:24	99:5,18
wondrous		17:4	72:3,8,	101:24
44:2	worked	68:18	12,15,23	102:25
wood	128:19	77:2	73:3	103:1,15,
wood			86:20,25	25 104:9
5.10	working	writed	, -	
5:12	working 10:1,21	writes	102:16	111:6
5:12 word	working 10:1,21 21:17	writes 123:16	102:16	111:6 115:4
5:12 word 87:1	working 10:1,21 21:17 33:1 36:1	writes 123:16 writing	102:16	111:6 115:4 116:21
5:12 word 87:1 words	working 10:1,21 21:17 33:1 36:1 37:19	writes 123:16 writing 65:4	102:16	111:6 115:4 116:21 130:22
5:12 word 87:1 words 94:5	working 10:1,21 21:17 33:1 36:1 37:19 46:5,9	writes 123:16 writing 65:4 68:19	102:16	111:6 115:4 116:21 130:22 132:6
5:12 word 87:1 words 94:5	working 10:1,21 21:17 33:1 36:1 37:19 46:5,9 49:5,7	<pre>writes     123:16 writing     65:4     68:19     81:18</pre>	102:16  yards	111:6 115:4 116:21 130:22 132:6 135:7
5:12 word 87:1 words 94:5 work	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23</pre>	102:16  yards 26:8,9	111:6 115:4 116:21 130:22 132:6 135:7 142:13,17
5:12 word 87:1 words 94:5 work 9:25 10:4	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written</pre>	102:16 Y yards 26:8,9 94:12	111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 <b>vellow</b>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14</pre>	102:16 <u>Y</u> yards 26:8,9 94:12 year	111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 <b>yellow</b> 109:13
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5,	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9</pre>	102:16 <u>Y</u> yards 26:8,9 94:12 year 16:13,15,	111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 <b>yellow</b> 109:13
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9</pre>	102:16 Y yards 26:8,9 94:12 year 16:13,15, 25 23:5	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong</pre>	102:16 <b>Y</b> <b>yards</b> 26:8,9 94:12 <b>year</b> 16:13,15, 25 23:5 26:17	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24</pre>	102:16 <b>y</b> <b>yards</b> 26:8,9 94:12 <b>year</b> 16:13,15, 25 23:5 26:17 33:19,22	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5     99:21</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15</pre>	102:16 <b>Y</b> <b>yards</b> 26:8,9 94:12 <b>year</b> 16:13,15, 25 23:5 26:17 33:19,22 44:20	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25 32:9,11,	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5     99:21     102:8</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15     137:16</pre>	102:16 Y yards 26:8,9 94:12 year 16:13,15, 25 23:5 26:17 33:19,22 44:20 65:12	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23 17:19</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25 32:9,11, 13,22,25	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5     99:21     102:8     121:8</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15     137:16     138:11</pre>	102:16 <b>y</b> <b>yards</b> 26:8,9 94:12 <b>year</b> 16:13,15, 25 23:5 26:17 33:19,22 44:20 65:12 81:20	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23 17:19 34:2,17</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25 32:9,11, 13,22,25 33:1,12	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5     99:21     102:8     121:8     122:18</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15     137:16     138:11 wrote</pre>	102:16 <b>Y</b> <b>yards</b> 26:8,9 94:12 <b>year</b> 16:13,15, 25 23:5 26:17 33:19,22 44:20 65:12 81:20 97:24	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23 17:19 34:2,17 39:18</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25 32:9,11, 13,22,25 33:1,12 36:8,11	<pre>working    10:1,21    21:17    33:1 36:1    37:19    46:5,9    49:5,7    50:2    58:21    70:12    72:1    88:13    96:6    98:2,5    99:21    102:8    121:8    122:18 </pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15     137:16     138:11 wrote     132:8</pre>	102:16 Y yards 26:8,9 94:12 year 16:13,15, 25 23:5 26:17 33:19,22 44:20 65:12 81:20 97:24 98:4,5,11	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23 17:19 34:2,17 39:18 45:15</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25 32:9,11, 13,22,25 33:1,12 36:8,11 44:7,9,18	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5     99:21     102:8     121:8     122:18 workings</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15     137:16     138:11 wrote     132:8</pre>	102:16 <b>Y</b> <b>yards</b> 26:8,9 94:12 <b>year</b> 16:13,15, 25 23:5 26:17 33:19,22 44:20 65:12 81:20 97:24 98:4,5,11 100:2,15	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23 17:19 34:2,17 39:18 45:15 59:2</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25 32:9,11, 13,22,25 33:1,12 36:8,11 44:7,9,18 47:2	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5     99:21     102:8     121:8     122:18  workings     33:14</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15     137:16     138:11 wrote     132:8 Wurtsmith</pre>	Y         yards         26:8,9         94:12         year         16:13,15,         25:23:5         26:17         33:19,22         44:20         65:12         81:20         97:24         98:4,5,11         100:2,15         102:20	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23 17:19 34:2,17 39:18 45:15 59:2 63:10</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25 32:9,11, 13,22,25 33:1,12 36:8,11 44:7,9,18 47:2 56:10	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5     99:21     102:8     121:8     122:18     workings     33:14 works</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15     137:16     138:11 wrote     132:8 Wurtsmith     9:23 12:2</pre>	Y         Y         yards         26:8,9         94:12         year         16:13,15,         25         26:17         33:19,22         44:20         65:12         81:20         97:24         98:4,5,11         100:2,15         102:20         103:12	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23 17:19 34:2,17 39:18 45:15 59:2 63:10 64:10</pre>
5:12 word 87:1 words 94:5 work 9:25 10:4 13:16 17:1,2,5, 13 18:8 23:23 26:15 31:25 32:9,11, 13,22,25 33:1,12 36:8,11 44:7,9,18 47:2 56:10 58:1,11	<pre>working     10:1,21     21:17     33:1 36:1     37:19     46:5,9     49:5,7     50:2     58:21     70:12     72:1     88:13     96:6     98:2,5     99:21     102:8     121:8     122:18     workings     33:14     works     102:17,18</pre>	<pre>writes     123:16 writing     65:4     68:19     81:18     100:21,23 written     69:14     77:3 81:9 wrong     63:24     99:15     137:16     138:11 wrote     132:8 Wurtsmith     9:23 12:2     15:7 </pre>	Y         Yards         26:8,9         94:12         Year         16:13,15,         25         26:17         33:19,22         44:20         65:12         81:20         97:24         98:4,5,11         100:2,15         102:20         103:12         119:11	<pre>111:6 115:4 116:21 130:22 132:6 135:7 142:13,17 yellow 109:13 yes/no 86:13 yesterday 14:23 17:19 34:2,17 39:18 45:15 59:2 63:10 64:10 67:15</pre>



MEETING August 21, 2024 WURTSMITH RESTORATION ADVISORY BOARD MEETING Index: YMCA..YMCA

107:22
108:19
111:12
118:14,22
130:7,8
134:15
137 <b>:</b> 5
138:17

### YMCA

77:7 109:10

