

**Congress of the United States**  
Washington, DC 20510

September 1, 2021

Dr. Catharine Varley  
BRAC Environmental Coordinator  
Air Force Civil Engineer Center  
2261 Hughes Avenue, Suite 155  
JBSA Lackland, TX 78236

Dear Dr. Varley,

As lifelong residents of Michigan and members of its congressional delegation, we write to submit our comments for the record with regards to the United States Air Force's proposed Interim Remedial Action (IRA) plan for Van Etten Lake near the former Wurtsmith Air Force base (Wurtsmith).

As you are aware, the residents of Oscoda have been subjected to harmful per- and polyfluoroalkyl substances (PFAS) in their groundwater and waterways—including at Van Etten Lake—for many years. The contamination is a result of the use of firefighting foam containing PFAS used by the Air Force at Wurtsmith. While we acknowledge the Air Force's work to initiate remediation and prepare the proposed IRA, it is insufficient to address PFAS contamination coming from Wurtsmith and abate the imminent and substantial threats to human health and the environment from PFAS contamination in the Van Etten Lake area.

Multiple stakeholders have shared concerns that the Air Force plume maps and plans do not accurately represent how much contamination is actually entering Van Etten Lake, and we urge the Air Force to work with the State of Michigan to ensure adequate testing and sampling. For example, the proposed IRA currently calls for 12 extraction wells across what is considered the worst plume entering Van Etten Lake, yet it only covers part of that plume versus the entirety of the plume in question. While this should dramatically reduce the contaminants entering the southern end of the lake, contaminated areas around Wurtsmith will continue bleeding PFAS into the lake and thus lead to continued toxic surfactant foaming and attendant threats to human health.

By choosing to focus on one part of one plume area in the proposed IRA, we are concerned that this and adjacent PFAS plumes will continue to spread unabated. We urge the Air Force to ensure the number, location, and length and depth of extraction wells accurately capture the entire PFAS contamination entering Van Etten Lake. Doing so will help ensure that the continued imminent threats to human health, fish, wildlife, and the environment from PFAS contamination are addressed.

We additionally wish to register our continued frustration at the Air Force's unwillingness to utilize the surface water discharge criteria established by the State of Michigan as Applicable or

Relevant and Appropriate Requirements (ARAR). The Air Force has stated that the discharge system included in the proposed IRA “uses best available technology that produces a discharge with at or near non-detectable levels entering Van Etten Lake.” As we noted in a previous letter sent this spring regarding the proposed IRA for Clark’s Marsh, rather than risk doing less now than what will ultimately be required, the Air Force should instead prioritize human health and meet Michigan’s state standards for addressing PFAS contamination from the start of the remediation process. This would also have the added benefit of preventing unnecessary expenditures of taxpayer money on enhancing treatment down the line.

Finally, in light of the recently released Department of Defense (DoD) Inspector General report evaluating DoD’s use of PFAS at military sites around the country and the exposure of both military personnel and civilians living near military sites, we were pleased to see that the Air Force engaged in a more transparent rollout surrounding the Van Etten Lake proposed IRA than had occurred for the Clark’s Marsh proposed IRA this spring. We urge you to continue with meaningful and substantive community engagement with Oscoda stakeholders.

Thank you for your consideration.

Sincerely,

  
Gary C. Peters  
United States Senator

  
Debbie Stabenow  
United States Senator

  
Daniel T. Kildee  
Member of Congress