



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

September 15, 2020

Ms. Kay M. Grosinke
AFCEC Program Manager
2261 Hughes Avenue, Suite 121
JBSA Lackland, Texas 78236-9821

SUBJECT: Draft Final Second Five-Year Review (FYR) for the Escanaba Former Defense Fuel Supply Point, OT-13 Report, Escanaba, Michigan.

Dear Ms. Grosinke:

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) staff has reviewed the Draft Final Second FYR for the Escanaba Former Defense Fuel Supply Point dated September 4, 2020. Perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) were both covered in the protectiveness analysis.

The remaining outstanding issue is that the FYR did not address the human health risk associated with consumption of PFOS contamination of fish that is a likely pathway to humans at this site. EGLE staff continue to be concerned that this pathway is being overlooked at this site and at other DoD sites in the State of Michigan. This risk will likely not be addressed for several years, while citizens continue to eat the fish from this heavily fished area.

Although the revised FYR addresses most of EGLE's concerns, we cannot concur with the conclusion that the remedy is protective in the short-term due to the likely risk to human health from fish contaminated by the site.

Please attach this letter to the FYR for the completeness of the administrative record.

If you need further information or assistance, please contact me, at 517-388-7037; delaneyr@michigan.gov; DSMOA Coordinator, Remediation and Redevelopment Division; or EGLE P.O. Box 30473, Lansing, Michigan 78909-7973.

Sincerely,



Robert Delaney
DSMOA Coordinator
Remediation and Redevelopment Division
517-388-7037

cc: Mr. Kenneth W. Brown, AECOM
Mr. Paul Waltz, Bay West
Mr. Puneet Vij, Michigan Department of Health and Human Services
Mr. Mike Neller, EGLE
Mr. Dan Yordanich, EGLE
Mr. John Bradley, EGLE