



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 8, 2021

VIA EMAIL

Mr. Michael S. Regan, Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460

Dear Administrator Regan:

On behalf of the State of Michigan, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and the Michigan PFAS Action Response Team (MPART) thank you for the many welcomed and constructive federal actions proposed in the United States Environmental Protection Agency's (EPA) per- and polyfluoroalkyl substances (PFAS) Roadmap.

An organized federal push to address PFAS on multiple fronts will strengthen our ability as federal and state regulators to address PFAS in collaboration with our local community partners. As it is implemented, the Roadmap will drive significant progress toward our shared goal of protecting public health and the environment.

Michigan stands out nationally for its number of known PFAS hot spots. This is a function of our proactively and comprehensively looking for contamination. In 2017 Michigan established MPART to lead that work. Comprised of seven state agencies, MPART tests groundwater, surface water, and fish at or near contaminated sites. We investigate active and former facilities suspected or known to be PFAS sources, including recently moving to preemptively sample nearby residential wells even before on-site data is available.

Over time, we have added programs to test biosolids, municipal wastewater treatment plant influent and effluent, and industrial point-source dischargers. As a result of these efforts, the State of Michigan has found PFAS in every part of our state—at military installations, landfills, industrial sites, airports, and many other locations. As of September 30, 2021, Michigan had 193 documented sites where groundwater contamination exceeded our cleanup criteria for PFAS.

In addition to providing leadership to the State's policy response, which has included establishing public drinking water standards (Maximum Contaminant Levels) and groundwater cleanup standards for PFAS, MPART has leveraged state agency resources over the last four years to coordinate response actions at individual PFAS sites. In addition to a range of programs to address PFAS at its source, the State has helped to connect hundreds of homes with impacted private wells to public water

Mr. Michael S. Regan

Page 2

December 8, 2021

supplies, provided more than 500 water filters and 1,390 replacement cartridges as an interim measure to protect homeowners, and collected over 51,000 gallons of firefighting foam for proper disposal.

While we are proud of how Michigan and many of our fellow states have stepped forward to lay the foundation for an effective nationwide PFAS response, we applaud the Biden-Harris Administration for your recent actions to bring much needed federal leadership to this critical public health and environmental challenge. As we consider tools and resources that can be developed federally and applied nearly universally at the state level, Michigan particularly welcomes those that will fill remaining gaps in our ongoing efforts. For example, expanded research into PFAS destruction technologies and addressing PFAS in consumer products and the food supply are beyond our state's existing capacity and regulatory purview. As a state that independently developed PFAS standards for drinking water and groundwater, we also recognize that federal standards in those areas will ease a significant burden on individual states.

In addition, Michigan was encouraged by the inclusion of faster action by the United States Department of Defense (DOD) as a goal in the Biden-Harris Administration's recent announcements on cross-agency PFAS action. The DOD is responsible for multiple sites in Michigan that represent large areas of highly impacted groundwater, soils, and surface water near residential neighborhoods. While the DOD has been actively addressing PFAS in Michigan, response activities at these sites should move forward more expeditiously, aggressively, and transparently. While your agency is not charged with oversight of this work, Michigan hopes the EPA will help strengthen the federal response by lending your expertise and fostering an increased sense of urgency.

As you move forward in implementing the EPA PFAS Roadmap and the related cross-agency initiatives the Biden-Harris Administration announced when unveiling it, Michigan looks forward to sharing our knowledge and experience and assisting the EPA in any way we can. Our team at MPART is available to you anytime to discuss Michigan's participation in the process.

Again, thank you for the important federal actions you have proposed to protect the American people from the risks associated with PFAS contamination. We look forward to collaborating with you in the coming years to address this vital challenge to public health and the environment.

Sincerely,



Liesl Eichler Clark
Director
517-284-6712

Mr. Michael S. Regan

Page 3

December 8, 2021

cc: Ms. Debra Shore, Regional Administrator, EPA, Region 5
Ms. Patricia Readinger, Governor's Washington Office
Ms. Kara Cook, Governor's Office
Mr. Aaron B. Keatley, Chief Deputy Director, EGLE
Ms. Abigail Hendershott, MPART Executive Director, EGLE
Mr. Travis Boeskool, Legislative Liaison, EGLE