



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

ARNG-IES-D

20 November 2021

MEMORANDUM FOR RECORD

SUBJECT: Determination Documentation of the Preliminary Assessment (PA) / Site Inspection (SI) for Camp Grayling JMTC, Grayling Army Airfield, Michigan

1. References:

- a. HQDA, ASA-IE&E, SAIE-ZA, memorandum (Army Environmental Per- and Polyfluoroalkyl Substances (PFAS) Policy), 8 January 2021
- b. DoDM 4715.20 (Defense Environmental Restoration Program (DERP) Management), 9 March 2012, incorporating Change 1, 31 August 2018
- c. OSD, memorandum (Investigating Per- and Polyfluoroalkyl Substances within the Department of Defense Cleanup Program), 15 September 2021
- d. AR 200-1 (Environmental Protection and Enhancement)
- e. Final Preliminary Assessment Report Camp Grayling, Michigan Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites ARNG Installations, Nationwide, August 2018
- f. Final Site Inspection Report Camp Grayling JMTC, Grayling Army Airfield, MI Perfluorooctane Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites ARNG Installations, Nationwide, September 2019
- g. Time-Critical Removal Action Memorandum, Connection of Two Properties to the City of Grayling Municipal Water Supply, Camp Grayling Airfield, Michigan, November 2019.
- h. Time-Critical Removal Action Memorandum, Grayling Township Installation of Whole House Filtration Systems, Camp Grayling Airfield, Michigan, November 2019.

2. The requirement for an environmental response to potential and/or known releases of PFAS under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Department of Defense Manual (DoDM) for the DERP is established in References 1.a through 1.d.

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3. This memorandum documents the determinations reached at the conclusion of the PA/SI phases in accordance with the Department of Defense (DoD) DERP Management manual (DERP Management; Reference 1.b). When concluding the PA/SI phase of the CERCLA process, the Army National Guard (ARNG) must formally document a determination for each site in accordance with paragraph 4.b.(2)(b) of Enclosure 3 of DoDM 4715.20. The potential options are as follows: 1) No need for action; 2) Need for a removal action, but not a remedial action; or, 3) Need for Remedial Investigation (RI)/Feasibility Study (FS). This Technical Memorandum documents the ARNG's determination related to the PFAS PA/SI at Camp Grayling JMTC, Grayling Army Airfield, Michigan. The need for a RI is based upon the following media-specific risk screening levels, as directed by the Assistant Secretary of Defense for Sustainment (Reference 1.c): Groundwater: PFOS: 40 nanograms per liter (ng/L) (40 parts per trillion (ppt)), PFOA: 40 ng/L (40 ppt), PFBS: 600 ng/L (600 ppt); Soil: PFOS: 130 micrograms per kilogram ($\mu\text{g}/\text{kg}$), PFOA: 130 $\mu\text{g}/\text{kg}$, PFBS: 1,900 $\mu\text{g}/\text{kg}$.

4. The PFAS PA at Camp Grayling, finalized August 2018, Reference 1.e, concluded further inspection is warranted at five Areas of Interest (AOI) at the Grayling Army Airfield due to potential release(s) of PFAS to the environment from the use or storage of PFAS-containing materials, such as Aqueous Film Forming Foam (AFFF).

5. The PFAS SI at Camp Grayling JMTC, Grayling Army Airfield, finalized September 2019, Reference 1.f, sampled five AOIs, and confirmed the presence of PFAS in the environment. Concentrations of PFAS equal to or exceeding the screening levels established by the Office of the Secretary of Defense (OSD) in Reference 1.c were found at all five AOIs. The SI concluded further investigation is warranted via Remedial Investigation (RI) at these five AOI where exceedances were found. It should be noted that Camp Grayling JMTC, MI has three other SI areas (Cantonment, North/South Post, and MATES/Range 30) and therefore, each SI area will have a separate decision document.

6. ARNG finalized two time critical removal action memoranda in November 2019 for the Grayling Army Airfield, References 1.g and 1.h. ARNG completed all municipal water connections and whole house filter installations, which are functioning as intended.

7. The determination for NFA, progressing to RI, or implementing a Time-Critical Removal Action (TCRA) is made independently for each of the AOIs at the subject SI area based on the data collected during the SI.

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8. Army National Guard Installations and Environment Division, Environmental Cleanup and Restoration Branch (ARNG G-9) hereby confirms the recommendations from the SI by formalizing the following decision(s) for each AOI at Grayling Army Airfield:

- a. AOI 1, Building 1144 Ramp (Building 1195): RI is required and TCRA's executed (References 1.g and 1.h).
- b. AOI 1, Building 1160 (Operations Building): RI is required and TCRA's executed (References 1.g and 1.h).
- c. AOI 2, Southern End of Runway 14/32: RI is required.
- d. AOI 2, Between Former MATES and Runway 14/32: RI is required.
- e. AOI 3, Former MATES: RI is required (Reference 1.h).
- f. AOI 4, Taxiway D: RI is required and TCRA executed (Reference 1.h).
- g. AOI 4, Northwestern end of runway 14/32: No further action.
- h. AOI 4, Area proximal to VAP 01: RI is required.
- i. AOI 5, Bivouac: No further action.
- j. AOI 5, City of Grayling Fire Department: RI is required.

9. Appropriate coordination regarding this determination has occurred between ARNG-Office of General Counsel (OGC) and ARNG G-9.

10. The point of contact for this action is Mr. David Connolly, PFAS Program Manager, david.m.connolly8.civ@mail.mil, or 703-607-7589.

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Per- And Polyfluoroalkyl Substances (PFAS) PA/SI Determination Summary

Camp Grayling, Grayling Army Airfield, Michigan

Location		Preliminary Assessment (PA)		Site Inspection (SI)	
AOI #	Area Description	Conclusion	Determination	Conclusion	Determination
1	Building 1144 Ramp (Building 1195)	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media confirmed above screening levels	Proceed with RI
	Building 1160 (Operations Building)	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media confirmed above screening levels	Proceed with RI
2	Southern End of Runway 14/32	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media confirmed above screening levels	Proceed with RI
	Between Former MATES and Runway 14/32	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media confirmed above screening levels	Proceed with RI
3	Former MATES	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media confirmed above screening levels	Proceed with RI

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4	Taxiway D	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media confirmed above screening levels	Proceed with RI; TCRA executed
	Northwestern end of runway 14/32	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
	Area proximal to VAP 01	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	Proceed with RI
5	Bivouac	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
	City of Grayling Fire Department	Insufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	Proceed with RI

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