



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

ARNG-IEZ

27 January 2022

MEMORANDUM FOR RECORD

SUBJECT: Administrative change to "Time Critical Removal Action, Action Memorandum, Grayling Township Whole House Filtration Systems, Camp Grayling, 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, Grayling Township Installation of Whole House Filtration Systems, Camp Grayling Airfield, Michigan, November 2019.

h. Time-Critical Removal Action Memorandum, Camp Grayling Cantonment and Lake Margrethe, Michigan, March 2021.

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 for DERP is established in References 1.a through 1.d.
3. This memorandum documents administrative changes reached after the preliminary assessment, site inspection and Time Critical Removal Action (TCRA) (references 1.e through 1.g) and relates specifically to administrative changes in the TCRA in Reference 1.g.

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4. Fourteen locations down gradient of the Grayling Army Airfield have whole house filter systems installed per Reference 1.g. The administrative change focuses on Section IV, A. 1, and replaces text in paragraph 2, which indicates that only one filter replacement will occur in the first year after one year of filter use. Instead, per the intent of the TCRA to provide alternate drinking water until CERCLA remedy, Army National Guard (ARNG) will monitor whole house filter systems each calendar quarter, or sooner if a filter indicator light indicates the need to sample, to establish “breakthrough” times when a filter can no longer absorb PFOS and PFOA at required levels. ARNG whole house filter sampling will occur, as necessary, either until a remedy is implemented that eliminates the need for whole house filters or a Record of Decision is signed under the CERCLA that makes a decision changing the need/schedule for the whole house filters. ARNG will continue replacing whole house filters, as necessary based upon monitoring data, during the same period.

5. ARNG will add this Memorandum for Record to the administrative record file for the Camp Grayling Army Airfield.

a. ARNG will document administrative changes to the Time Critical Removal Action Memorandum for Camp Grayling Cantonment Area and Lake Margrethe, in reference 1.h, in a separate Memorandum For Record.

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

7. The point of contact for this action is Dr. Bonnie Packer, PFAS Project Manager, bonnie.m.packer.ctr@army.mil, or 703-607-7977.

Encls

1. Memo, HQDA, ASA-IE&E, 8 Jan 21
2. DoDM 4715.20, 31 Aug 18
3. Memo, OSD, 15 Sept 21
4. AR 200-1
5. Assessment Report, Aug 18
6. Site Inspection Report, Sep 19
7. Removal Action Memo, Nov 19
8. Removal Action Memo, Mar 21

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