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# United States Senate

COMMITTEE ON  
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS  
WASHINGTON, DC 20510-6250

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May 3, 2022

The Honorable Lloyd J. Austin III  
U.S. Department of Defense  
1000 Defense Pentagon,  
Washington, DC 20301

Dear Secretary Austin:

As Chairman of the United States Senate's chief oversight committee and on behalf of my fellow Michiganders, I write today with continued concern regarding the elevated levels of per- and polyfluoroalkyl substances (PFAS) surrounding the Camp Grayling Joint Maneuver Training Center. I appreciate the Department of Defense's (DoD) ongoing partnership with the Michigan PFAS Response Team (MPART) to test for PFAS contamination in the area's water sources. However, the public health threat PFAS poses to the community surrounding Camp Grayling demands additional action and continued communication with residents.

In May 2017, Camp Grayling installation officials identified PFAS in groundwater above the EPA Lifetime Health Advisory (LHA) levels of 70 parts per trillion (ppt).<sup>1</sup> Since then, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and Michigan Army National Guard have identified 138 residential well and 259 groundwater monitoring well samples above EGLE's PFAS criteria of 16 ppt for PFOS and 8 ppt for PFOA in the surrounding area.<sup>2</sup> Due to the high levels of contamination, Camp Grayling was included as part of a July 2021 DoD Office of Inspector General (OIG) report on the Department's efforts to control PFAS contamination effects. The report found that officials discovered PFAS contamination in an unexpected location, resulting from an unknown source.<sup>3</sup> The report concluded that, as a result, people and the environment may be exposed to preventable risks from PFAS-containing

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<sup>1</sup> Department of Defense, Office of Inspector General, *Evaluation of the Department of Defense's Action to Control Contaminant Effects from Perfluoroalkyl and Polyfluoroalkyl Substances at Department of Defense Installations* (DODIG-2021-105) (July 2021).

<sup>2</sup> Department of Environment, Great Lakes, and Energy, Michigan PFAS Action Response Team, Grayling Army Airfield Investigation Page ([www.michigan.gov/pfasresponse/0,9038,7-365-86511\\_82704\\_84187---,00.html](http://www.michigan.gov/pfasresponse/0,9038,7-365-86511_82704_84187---,00.html)) (accessed March 16, 2022).

<sup>3</sup> *Id* at 1.

materials other than Aqueous Film Forming Foam (AFFF), which is striking, considering DoD's primary focus on AFFF for PFAS containment.<sup>4</sup>

Most recently, as part of the Army's ongoing PFAS-related efforts required under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Army identified another residential drinking water well that exceeds EPA LHA levels at 89.5 ppt.<sup>5</sup> In response, the Army announced it plans to conduct additional sampling in May 2022.<sup>6</sup>

Given the continuing contamination surrounding Camp Grayling, I believe it is critical that Congress, my constituents, and local stakeholders better understand how DoD implemented the CERCLA and other DoD policies in the areas surrounding Camp Grayling and what additional actions DoD plans to take. Therefore, I request that you please provide us with answers to the following inquiries by May 31, 2022.

1. Please describe in detail the decision process for Applicable or Relevant and Appropriate Requirements at Camp Grayling.
  - a. Please describe in detail why a decision has not yet been made on the Applicable or Relevant and Appropriate Requirements at Camp Grayling, as the decision will indicate whether or not DoD will follow and implement Michigan criteria for soil, groundwater, surface water, and drinking water.
2. Please describe in detail why Time Critical Removal Actions address only residential wells that exceed the EPA LHA and not Michigan Drinking Water Criteria at and around Camp Grayling?
3. Please describe in detail why Time Critical Removal Actions have not addressed storm water exceedances at and around Camp Grayling.
4. Please describe in detail why Time Critical Removal Actions have not been implemented to remove source area soils or treat contamination plumes emanating from Camp Grayling sites.
5. Please describe in detail DoD's efforts to apply an enterprise-wide approach to address all sources of potential PFAS exposure at Camp Grayling as required under DoDI 4715.18.

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<sup>4</sup> *Id* at 1.

<sup>5</sup> Email from Robert Runyans, Legislative Counsel, Office of the Chief Legislative Liaison, Department of Defense, to Peters Office Staff (Feb. 25, 2022).

<sup>6</sup> *Id.*

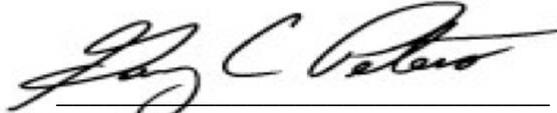
The Honorable Lloyd J. Austin III

April 27, 2022

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Thank you for your prompt attention to this matter. If you or members of your staff have any questions, please contact Chelsea Davis on the Homeland Security and Governmental Affairs Committee staff at (202) 578-8009 or Mike Stoeber from Senator Peters' staff at (202) 224-6221.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary C. Peters", written over a horizontal line.

Gary C. Peters  
Chairman