Engineering Evaluation/Cost Analysis
Fact Sheet - Selfridge ANG Base

Purpose
The purpose of this fact sheet is to provide information on the procedures and activities the Michigan Air National Guard uses in conducting non-time-critical removal actions (NTCRA) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). It outlines an Engineering Evaluation/Cost Analysis (EE/CA) for a NTCRA at Selfridge Air National Guard Base (SANGB), Michigan. As a component of the Air National Guard’s (ANG) public participation process in environmental response actions, this fact sheet outlines the key details of the EE/CA, including the contaminant source, health concerns, regulatory framework, proposed alternatives, and avenues for public participation in the NTCRA. This fact sheet is intended to raise public awareness and understanding of NTCRAs and the EE/CA, and to solicit public input into the cleanup of a contaminated site at SANGB. The public can contribute valuable insights and feedback that may assist the ANG in making informed, sound, and comprehensive decisions in addressing environmental challenges at SANGB.

What is an EE/CA?
An engineering evaluation and cost analysis (EE/CA) is a systematic process employed in CERCLA removal actions to assess and address the contamination of a specific release site. an EE/CA must be completed for all non-time-critical removal actions under CERCLA as required by section 300.415(b)(4)(i) of the NCP. The goals of the EE/CA are to identify the objectives of the removal action and to analyze the effectiveness, implementability, and cost of various alternatives that may satisfy these objectives. An EE/CA involves a detailed examination of the environmental conditions, contaminant sources, and potential risks to human health and the environment. The primary goal of an EE/CA is to develop and evaluate various alternatives for addressing environmental concerns. An EE/CA is similar too, but is more streamlined than, a CERCLA remedial investigation and feasibility study (RI/FS). The EE/CA process is a critical step in the larger framework of environmental restoration and remediation efforts, ensuring a well-informed and strategic approach to safeguarding both public health and the environment. The subject EE/CA evaluates removal action alternatives and identifies the most suitable and efficient removal action to mitigate the impact of PFOS contamination in shallow soil at the SANG fire department’s former nozzle testing area (NTA).

What is a NTCRA?
CERCLA and the NCP define removal actions to include "the cleanup or removal of released hazardous substances from the environment, such actions as may necessarily be taken in the event of the threat of release of hazardous substances into the environment. such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances, the disposal of removed material, or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or to the environment, which may otherwise result from a release or threat of release." EPA has categorized removal actions in three ways: emergency, time-critical, and non-time-critical, based on the type of situation, the urgency and threat of the release or potential release, and the subsequent time frame in which the action must be initiated. NTCRA removal actions respond to releases requiring action but that do not require immediate action and can start later than 6 months after the determination that a response is necessary. A NTCRA is a proactive response to address environmental hazards that necessitate careful consideration and planning. By taking a deliberate and thorough approach, decision-makers develop informed choices about the most appropriate course of action for mitigating environmental hazards over a defined timeframe.
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Overview
- The Air National Guard is conducting a 30-day public review and comment period for an EE/CA study and report at Selfridge Air National Guard Base, Michigan.
- The study focuses on a NTCRA to address the release of perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA), and other per- and polyfluoroalkyl substances (PFAS) into the environment.

Location and Contaminant Sources
- The NTCRA specifically targets a former NTA at the installation, which is no longer utilized by the fire department.
- An approximate 4-acre area will be excavated to a depth of approximately 2 ft below ground surface generating approximately 13,000 cubic yards of soil which will be removed and properly disposed from the installation.
- PFOS and PFOA, along with various PFAS contaminants that were released into the environment, primarily linked to the use of aqueous film forming foam (AFFF) used for historical fire suppression and associated training activities.

Health Concerns
- Elevated PFAS concentrations in shallow soil have been identified as hazardous risks to human health. When PFAS enter the soil, they can pose health concerns, primarily through exposure pathways such as ingestion of contaminated soil, inhalation of dust particles, and spread to drinking water sources.
- Health effects may include developmental issues, reproductive problems, and potential links to certain cancers.

EE/CA Alternatives
- Four technology alternatives are proposed and evaluated based on criteria including effectiveness, implementability, and cost. Alternatives include No Action (Alternative 1), Land Use Controls (LUCs; Alternative 2), Excavation and Offsite Disposal or Treatment (Alternative 3), and In-situ Stabilization (Alternative 4). The proposed action is to excavate and remove the soils containing PFOS at concentrations that exceed 1000 ug/kg; plus conduct in-situ stabilization of deeper soils, and implementation of land use controls to prevent human exposure to PFOS remaining at the site until a final remedial action can be implemented.

Conclusion
- The Air National Guard encourages active public participation in the review and comment process to ensure transparency and community involvement in the decision-making regarding the NTCRA.
- The safety and well-being of the community are paramount, and the feedback received during this period will contribute to the informed decision-making process.
- For more information, or to place an inquiry, please see the information below.

Who to Contact with Questions?
William Myer (COL Ret), PG
ANG Environmental Restoration Program Manager
(william.myer.2@us.af.mil)

For More Information

Other Information
The EE/CA will be available for public review and comment from 5 December 2023 until 4 January 2024. The EE/CA is available at the following website: https://www.127wg.ang.af.mil

Location of Public Notice:
https://www.macombdaily.com/author/medianewsgroup/