District Health Department No. 2
Alcona, Iosco, Ogemaw and Oscoda Counties

PFAS RESOLUTION

Whereas perfluoroalkyl and polyfluoroalkyl substances (PFAS) are synthetic chemicals that do not occur naturally in the environment. There are thousands of these ubiquitous man-made chemicals and have been used in industry and consumer products worldwide since the 1950’s. PFAS are extremely persistent in the environment and resistant to typical degradation processes. PFAS has created a public health crisis;

Whereas perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) are the two most studied PFAS. Exposure to PFOS and PFOA is widespread and global. PFOS and PFOA also persist in the human body and are eliminated slowly. PFOS and PFOA pose adverse effects for human health if ingested and are known to bioaccumulate. The laboratory blood test for PFAS detection in the human body has limitations;

Whereas a “Do Not Eat the Fish” advisory has existed since 2012 for Clark’s Marsh. The advisory has since been expanded to certain types of fish from the AuSable River and Van Etten Creek;

Whereas the former Wurtsmith Air Force Base located in Oscoda Township is Michigan’s first PFAS site in which a Health Advisory (February 2016) was issued to residents with homes or businesses located in areas affected by PFOS and PFOA plumes. An alternate water source was recommended. The Health Advisory area has since expanded multiple times affecting a greater number of properties/people;

Whereas foam on inland lakes and rivers are attributed to PFOS and PFOA and contaminate the environment. A Health Advisory for avoiding ingestion of foam was issued September 2017 for Van Etten Lake. Additionally, residents are identifying other bodies of water that have foam believed to be attributed to PFAS. In 2018, the Michigan Department of Environmental Quality (MDEQ) reported the pilot for foam removal failed. There does not exist any technology to effectively remove the foam from inland lakes and rivers;

Whereas October 2018, a “Do Not Eat the Deer” advisory was issued for deer harvested within a five-mile radius of Clark’s Marsh by the Michigan Department of Health and Human Services (MDHHS) and the Michigan Department of Natural Resources (MDNR);
Whereas PFAS levels are known to bioaccumulate in animals and the research on wildlife, fish, and game is limited. Toxicologists warn people to not eat animals with PFAS contamination; 

Whereas the Environmental Protection Agency (EPA) set a Lifetime Health Advisory (LHA) level for two PFAS in drinking water, PFOS and PFOA. The LHA level is 70 parts per trillion (ppt, equal to 70 ng/L) for PFOS and PFOA combined, or individually if only one is present. The EPA has not set health advisory levels for other PFAS compounds. In January 2018, the State of Michigan adopted 70 ppt for decision making purposes; 

Whereas House Bill 5373, introduced in 2018, recommends a state standard for PFAS in drinking water of 5-ppt for PFOS and PFOA, which is 14 times lower than the EPA’s level of 70-ppt. Disappointingly, the bill has sat idle. Subsequently, residents have lost confidence in the 70 ppt protective value and continue to wait for scientific advisory to state government and bi-partisan legislative support for PFAS regulations; 

Whereas a Restoration Advisory Board (RAB) for public outreach was established in 2017 to address PFAS issues related to the former Wurtsmith Air Force Base, a CERCLA “Superfund” program site. Progress has been very slow and disturbingly the Department of Defense seems to have an oppositional stance; 

Whereas the Michigan PFAS Action Response Team (MPART) in 2018 developed a plan to test all wells associated with community water supplies, schools, child care providers, and Michigan Head Start Programs (Type II). Through this initiative, Whittemore-Prescott Area Schools were found to have total PFAS levels ranging from 20 ppt to 33 ppt in three wells, placing the school results in the “middle bucket”. MDEQ will be retesting and monitoring for one (1) year. The State of Michigan has several on-going PFAS site investigations and resources of time and funding during this rapidly growing situation have been limited, which has burdened State and local governments; 

Whereas the Department of Defense has installed a granular activated carbon (GAC) treatment plant at the former Wurtsmith Air Force Base. However, MDEQ states

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1 Agency for Toxic Substances and Disease Registry. (Revised 5/2018). An Overview of Perfluoroalkyl and Polyalfluoroalkyl Substances and Interim Guidance for Clinicians Responding to Patient Exposure Concerns

2 Michigan’s PFAS Response website: www.michigan.gov/pfasresponse
it does not adequately address contamination removal and must be re-evaluated. Additionally, MDEQ has issued citations to the Air Force for lagging PFAS clean up at the former Wurtsmith Air Force Base. The Department of Defense remains neglectful of its ethical and financial obligations to the community;

Whereas recently, Oscoda Dump in northern Oscoda Township has been identified to have PFAS contamination concerns by MDEQ. It was discovered that elevated levels of PFAS were present in several ground water monitoring wells at the site. This has prompted MDEQ to initiate a site investigative plan which includes drinking water well testing at nearby homes and businesses;

Whereas MDEQ has initiated soil boring sampling, which is providing key investigative data. However, heightened concerns for biosolids utilized is increasing and criteria that eliminates PFAS contamination needs to be established in land application use;

Whereas especially alarming for rural communities is the unknown effect of PFAS contamination on farms, livestock, or food products. There is very little scientific data and research to address PFAS in agriculture and livestock;

Whereas a 2012 MDEQ report outlining concerns for human health and exposure to PFAS chemicals and clear recommendations was largely not acted upon and not available to District Health Department No. 2 (DHD2) nor the public until summer of 2018;

Whereas the community and businesses in PFAS affected areas in Iosco County have been stigmatized. Residents and veterans bear the burden of concerns with health and financial impacts. Clearly, they are deserving of answers, immediate and effective remediation efforts, and compensation.

Therefore, Be It Resolved,

The MDEQ must act with a sense of urgency to compel the Department of Defense to immediately stop the release of all PFAS contaminated water from the former Wurtsmith Air Force Base into Van Etten Lake. Additionally, The Department of Defense must be held accountable as the responsible party for the contamination and be made responsible for remediation and compensation efforts;

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3 Michigan Department of Environmental Quality - Violation Notice to the U.S. Air Force, October 19, 2018
The EPA must no longer shun its ethical duty to provide national leadership and promulgate an inclusive, high priority timeline and plan for states regarding the regulation of PFOS and PFOA; and nationally move in an expeditious and comprehensive manner;

Recognizing that PFAS has created a public health crisis, we are at a crossroads awaiting scientific research. It is imperative that a national commitment is made to allocate resources for the funding of scientific investigations of PFAS to garner data and recommendations;

It is imperative that federal, state and local agencies coordinate epidemiological studies to create a body of knowledge to fully understand the health effects on the human body. Additionally, the Department of Defense needs to fund the exposure investigation of veterans and families and meet any of their future health needs. These studies are necessary to keep medical professionals knowledgeable about PFAS and their effects on human health, because as a nation we will be dealing with the effects of PFAS for decades to come;

Federal and Michigan legislators must heed scientific research and act prudently which will likely require a reduction in the LHA levels for PFAS chemicals in drinking water. Additionally, legislation limiting the use of PFOS and PFOA, including biosolids in land application use, must be introduced;

Adequate and continuous funding to State and local public health departments is necessary to allow for continuous and effective public health interventions in the coming decades;

The continuation of the coordinated response from MPART must operate in a robust and comprehensive manner, addressing ongoing site investigations and proactively lead the State of Michigan in dealing with PFAS;

Innovative technology needs to be explored and developed to address the remediation of foam on inland lakes and waters and we must work expediently to restore our bodies of water to a more natural state;

Resources be provided to the residents and veterans which will address their PFAS exposure concerns, their physical and mental well-being, and make them whole with retribution.
Signed this day of April 22, 2019, by:

Date

District Health Department No. 2 Board of Health Commission Chair:

[Signature]

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