



October 3, 2022

Dear Cherry Capital Airport Neighbor,

As you may be aware, the Cherry Capital Airport has been conducting environmental studies regarding the presence of PFAS (per- and poly-fluoroalkyl substances) on airport property since 2020. As part of the airport's certification requirements, the Federal Aviation Administration (FAA) and Michigan Department of Transportation (MDOT) require the use of Aqueous Film Forming Foam (AFFF) as the only acceptable material for aviation fuel fires. Unfortunately, these same chemicals which help provide life safety in fire events, also have certain PFAS compounds as part of their composition. Cherry Capital Airport has worked with the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to test the airport area groundwater and found amounts exceeding criteria established by EGLE. The Northwest Regional Airport Authority (NRAA) continues to work with EGLE to better characterize the extent of these compounds and potential impacts for the health and safety of our community.

As part of the ongoing investigation process, we are required and committed to notifying you if these compounds may migrate in groundwater beneath your property. Enclosed you will find a standard EGLE form that provides you with the legal notice of the potential presence of two PFAS compounds (PFOS\PFOA) in the groundwater. Although groundwater concentrations were above drinking water criteria, based on our ongoing partnership with our neighbors it is the NRAA's understanding that none of our neighbors or downstream neighbors are on well systems for drinking water.

We are actively working with EGLE to obtain funding to perform additional characterization of the impacted areas and evaluate next steps.

Please review our on-going investigation work here: <https://tvcairport.com/cherry-capital-airports-environmental-commitment-pfas/>, and contact us with any questions you may have.

Sincerely,

Kevin Klein, AAE
Chief Executive Officer
Northwest Regional Airport Authority

For EGLE Use Only
ITS # _____
Site ID # _____
Category Code: _____

NOTICE OF MIGRATION OF CONTAMINATION

(Under the authority of Part 201, Natural Resources and Environmental Protection Act, 1994 Act 451, as amended, (NREPA) and the Rules promulgated thereunder)

An owner or operator of property that is a facility, and/or who is subject to MCL324.20107a, and who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates is required under R 299.51017(1) and MCL 324.20114(1)(b)(ii) & (iii) to notify the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and affected property owners. Submission of this notice does not fulfill the notification requirements of MCL 324.21309a.

The notice must be provided within 45 days (MCL 324.20107a) or within 30 days (MCL 324.20114) after the owner or operator has reason to believe that hazardous substances have migrated, or are likely to have migrated, to or beyond the boundary of his or her property (see R 299.51017 for exceptions that apply to parties subject to MCL 324.20107a).

Use of this form is mandatory for the notice required by R 299.51017(1) and may also be used by parties subject to MCL 324.20114(1)(b)(ii) & (iii). This form may also be used to provide notice to affected property owners as required by those rules.

If a person holds a permit for an oil and gas well under Part 615, Supervisor of Wells, of the NREPA and there is a release from the oil and gas exploration or production activities, that person shall give notice to EGLE and to the owner of the surface rights of the property.

If a person holds an easement and there is a release from the easement holder's activities, that person shall provide notice to EGLE and to the grantor of the easement, or the grantor's successor in interest, if any.

Completing this notice in no way relieves a person who is subject to MCL 324.20114 from the responsibility to undertake required response activities.

This notice must be sent to the EGLE office that serves the county in which the property is located. A list of EGLE offices is available at [EGLE - Due Care \(michigan.gov\)](http://EGLE - Due Care (michigan.gov)) or by calling the Remediation and Redevelopment Division's Lansing office at 517-284-5187. EGLE will not prepare acknowledgement of receipt of these notices. The sender is responsible for sending the report using a method that provides proof of delivery if such proof is desired. Please label the outside of the envelope "Migration Notice." Additional guidelines for the compliance with the requirements of R 299.51017(1) or MCL 324.20114(1)(b)(ii) & (iii) are available at [EGLE - Due Care \(michigan.gov\)](http://EGLE - Due Care (michigan.gov)).

THIS NOTICE IS PROVIDED PURSUANT TO: R 299.51017 MCL 324.20114(1)
(check both, if applicable)

Please provide the following information as completely as possible.

- Name and location of the property that hazardous substances are emanating from:
Name: Northwest Regional Airport Authority
Address: 727 Fly Don't Drive
Location: Cherry Capital Airport
City/County: Traverse City / Grand Traverse
Property Tax Identification Number, or if applicable, the ward and item number: 51-113-002-02; 51-113-002-03; 51-113-002-04; and, 51-017-001-00
Latitude (decimal degrees): 44.740996° Longitude (decimal degrees): -85.587619°
Reference Point for Latitude and Longitude:
Center of Site: Main/front door: Front gate/main entrance: Other: Intersection of Runways
Collection Method: Survey: Interpolation: GPS:
- Provide any additional ID numbers associated with the property (e.g., EPA ID No., BEA No., Part 213 facility ID No., etc.): 28000004-BEA-1; Part 213 facility ID: 00007311

3. Name, address, and telephone number of the property owner, operator, or other party submitting the notice:
Name: Northwest Regional Airport Authority
Address: 727 Fly Don't Drive
City/State: Traverse City, MI
Telephone Number: (231) 947-2250
4. Name, address and telephone number of a contact person familiar with the content of the notice:
Name: Kevin Klein – Chief Executive Officer
Address: 727 Fly Don't Drive
City/State: Traverse City, MI
Telephone Number: (231) 947-2250
5. If this Notice is provided pursuant to R 299.51017, provide the address and other location information for the *adjacent* property(s) onto which contamination is migrating, has migrated, or is likely to migrate.

If this Notice is provided pursuant to MCL Section 324.20114(1), provide the address and other location information for *each* property onto which contamination has migrated. Notice should be sent to the property owner of record. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (e.g., a prison, state park, etc.). Notices to the Michigan Department of Transportation (MDOT) for state owned roadways should be sent to Contaminated Site Specialist, Environmental Services Section, MDOT-Bureau of Development, 425 W. Ottawa Street, P.O. Box 30050, Lansing, Michigan 48909. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (i.e. a prison, state park, etc.).

See Attached Document

6. Complete the Table on Page 3 of this Form for each hazardous substance which has migrated, or is likely to have migrated, beyond the property boundary at a concentration that exceeds a Generic Residential Cleanup Criterion developed by EGLE pursuant to MCL 324.20120a(1). Complete and attach additional copies of Page 3, if necessary, to list all hazardous substances that must be reported. Include a scaled map or drawing that shows the location of sampling points identified on the Table on Page 3, the property boundaries, and the adjacent property owners if providing notice pursuant to R 299.1017(1) or all impacted property owners if providing notice pursuant to MCL 324.20114(1).
7. Provide a summary of the information which shows that contamination is emanating from, or has emanated from, and is present beyond the boundary of the source property at a concentration which exceeds the generic residential criteria developed by EGLE pursuant to MCL 324.20120a(1)(a). This summary shall identify the environmental media affected, specific hazardous substances, and the concentrations of those hazardous substances in all affected environmental media at the property boundary and in any sample locations beyond the property boundary. The summary shall also describe the basis for the conclusion that the contamination is emanating, has emanated, or is present beyond the boundary of the source property, including whether the conclusion is based on groundwater analytical data or fate and transport modeling, both, or neither.

Groundwater sampling at the airport has identified concentrations of PFOA, PFOS, and PFNA at concentrations greater than the EGLE Part 201 criteria developed pursuant to MCL 324.20120a(1)(a) at sampling location adjacent to the airport's downgradient property boundary. Sampling locations and results of the most recent groundwater sampling, which was completed in January & February 2022, are presented on accompanying Figure 2. Soil sampling, which was completed in October 2020, are presented on Figure 3. One groundwater monitoring location, MW-105, is located off airport. MW-105 is located on Michigan Department of Transportation property, adjacent to the railroad and Parsons Road. MW-105 contained concentrations of PFOA, PFOS, and PFNA greater than the Part 201 drinking water criteria.

Based on the recalcitrant nature of PFAS and criteria exceedances proximal to the property boundary, it is reasonably inferred that PFOA, PFOS, and/or PFNA either have, are, or are likely to, migrate to adjacent properties.

8. If the person making this notice has reason to believe that a migrating hazardous substance has affected, or is likely to affect, a private or public water supply, then that water supply must be identified here: N/A

- | | YES | NO |
|---|--------------------------|-------------------------------------|
| 9. Is this notice being submitted within the timeframes established under R 299.51017 and/or MCL 324.20114(1), as applicable? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 10. Is this notice in addition to a notice that was submitted prior to <i>December 21, 2002</i> ? (R 299.51017(4)(c)) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 11. Is this notice related to an oil and gas well permit (R 299.51017(2))?
Permit #: | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 12. Is this notice related to an easement (R 299.51017(3))?
(NOTE: All easement grantors <i>must</i> receive this notice.) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 13. Has surface water been affected (R 299.51017(1))?
(If yes, please identify the affected surface water body.)
[REDACTED] | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

CERTIFICATION:

With my signature below, I certify that I am the owner of the facility or that I am legally authorized to execute this notice on behalf of the owner or operator named on this form, and that to the best of my knowledge and belief the above representations are complete and accurate. I understand that intentionally submitting false information to EGLE is a felony and may result in fines up to \$25,000 for each violation.

Signature _____
(Owner or person legally authorized to bind the person making this report)

Date _____

Name (Typed or Printed) Kevin Klein

Title (Typed or Printed) Chief Executive Officer

See Item 6 on Page 3 of this Form for instructions to be used in completing this table. Attach additional pages if necessary. The information to be included in each column of the table is:

- Column A Name of hazardous substance.
- Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
- Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
- Column D Sample location for Column C (relate to label on map).
- Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
- Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
- Column G Direction of contaminant migration, if known.
- Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
- Column I Sample location for Column H (relate to label on map).
- Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration	I Sample Location for "H"	J Environmental Medium for "H"
Perfluorooctanoic acid (PFOA)	335-67-1	3.05	MW-404	Groundwater	3,235'	NE	0.061	MW-408	Groundwater
Perfluorosulfonic acid (PFOS)	1763-23-1	0.631	MW-102	Groundwater	160'	NNW	0.631	MW-102	Groundwater
Perfluorononanoic acid (PFNA)	375-95-1	0.687	MW-404	Groundwater	3,235'	NE	0.00832	MW-408	Groundwater
Perfluorooctanoic acid (PFOA)	335-67-1	2.91	SS-A1-01	Soil	575'	NNW	0.0562	MW-106	Groundwater
Perfluorosulfonic acid (PFOS)	1763-23-1	4.68	SS-A1-02	Soil	125'	NNW	0.631	MW-102	Groundwater
Perfluorononanoic acid (PFNA)	375-95-1	4.05	SS-A1-01	Soil	575'	NNW	0.0191	MW-106	Groundwater

Total Number Samples Collected: 30 Total Number of Samples Exceeding Criteria: 22

A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice