



STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



GRETCHEN WHITMER  
GOVERNOR

DAN EICHINGER  
ACTING DIRECTOR

January 3, 2023

VIA EMAIL ONLY

Dave Latchana, Vice President  
Wolverine World Wide, Incorporated  
9341 Courtland Drive, NE  
Rockford, Michigan 49341

Dear Dave Latchana,

**SUBJECT:** Notice of Insufficient Information in the Response Activity Plan for the Former Wolverine Sole Plant, 485 Wolverine Drive, NE, Rockford, Kent County, Michigan;  
Facility ID No.: 41002445

The Michigan Department of Environment, Great Lakes, and Energy, (EGLE), Remediation and Redevelopment Division, has reviewed the Response Activity Plan (ResAP) – Investigation Summary for the Former Wolverine Sole Plant at 485 Wolverine Drive, NE in Rockford, Kent County, Michigan, submitted by Rose & Westra, a Division of GZA GeoEnvironmental, Inc. (GZA) on the behalf of Wolverine World Wide, Incorporated (Wolverine) on October 12, 2022.

Pursuant to Section 20114b(3) of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), EGLE is informing Wolverine that the response activity plan does not contain sufficient information for EGLE to determine whether the response activity plan is approvable. The information that is lacking includes:

- Part 201 requires Wolverine to delineate the nature and extent of the contamination, both horizontally and vertically, for all pathways exceeding Part 201 criteria. The proposed wells, GZA-MW-02 and GZA-MW-07, by themselves are insufficient to fully delineate the extent of the contamination. Additional wells are needed to delineate the groundwater contamination horizontally and vertically to the north, south, east, and west. The proposed monitoring and investigation activities should also assess the entire vertical profile of the aquifer and characterize aquifer conditions throughout all four seasons of the year.
- The conceptual site model indicates that the Rogue River receives water from the aquifer at the facility. Since groundwater samples collected in the vicinity of the river have contained per- and polyfluorinated substances (PFAS) at

concentrations above the Groundwater Surface Water Interface (GSI) Criteria, mitigation measures must be implemented for the GSI exposure. The ResAP should include response activities to fully investigate the extent of the impact to the Rogue River and mitigate the current GSI exposure. Additionally, the ResAP should include appropriate sampling and investigation of the surface water feature that traverses the facility south of EGLE-GW-02 and discharges to the Rogue River.

- The ResAP should reflect that soil cuttings from the monitoring well installation activities will be containerized and disposed of off-site.

**In order to document that Wolverine is diligently pursuing response activities under Part 201, a revised ResAP that identifies the additional monitoring well locations, including a schedule for implementation of the proposed tasks, shall be submitted within 60 calendar days of the date of this letter.** Please address these deficiencies and submit a new Request for EGLE Review of Response Activity Plan form with the revised ResAP.

The deficiencies identified in this letter are based on representations and information contained in the submittal. Since the plan did not contain sufficient information, a comprehensive review for technical adequacy could not be completed by EGLE. Therefore, the deficiencies noted may not be a full and complete list of items that may need to be addressed to approve the ResAP.

If you have questions regarding this letter, please contact Leah Gies, Project Manager, at 616-215-4781 or via email at [GiesL1@Michigan.gov](mailto:GiesL1@Michigan.gov); or you may contact me at the telephone number listed below.

Sincerely,

*Karen Vorce*

Karen Vorce  
District Supervisor  
Grand Rapids District Office  
Remediation and Redevelopment Division  
616-439-8008

cc/via email: Loretta Powers, GZA  
Trevor Litwiller, GZA  
Dan Yordanich, EGLE  
Nancy Johnson, EGLE  
Leah Gies, EGLE