

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

GRAND RAPIDS DISTRICT OFFICE



May 19, 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 Approval with Conditions of 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 (RRD), has reviewed the Response Activity Plan for Investigation Summary for the Former Wolverine Sole Plant facility located at 485 Wolverine Drive, NE in Rockford, Kent County, Michigan, submitted by Rose & Westra, a Division of GZA GeoEnvironmental, Incorporated (GZA) on the behalf of Wolverine World Wide, Incorporated (Wolverine) on February 24, 2023. Section 20114b(3) of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), states that when a Response Activity Plan is submitted for approval, EGLE may notify the submitter that the plan is approved with conditions, if applicable. The Response Activity Plan is approved with the following conditions:

- A site-specific wetland delineation must be completed between the Former Sole Plant structure and the Rogue River and south of the structure to better define the GSI compliance points. If the groundwater flow direction is confirmed to be west from the structure toward the river and/or south toward the stream and wetlands are present between the structure and the river and/or stream, compliance with the GSI pathway must be demonstrated prior to discharge to the wetlands and not the river or stream. Wetlands are considered Surface Waters of the State under Part 4 of the Water Quality Standards R323.1044(u), and the GSI criteria apply to them. The wetlands delineation must be completed within the next quarter.
- If the wetlands delineation demonstrates that PFAS compounds are detected within the wetlands area above the GSI criteria, a Response Activity Plan for GSI compliance must be submitted to EGLE within 60 days of completion of the wetlands delineation.

- The five pore water sampling points currently proposed along the Rogue River may be premature since the GSI compliance points have not been identified.
 EGLE requests that the need and location for these sampling points be determined upon completion of the wetlands delineation.
- If purge water generated during the well sampling activities contains PFAS above the Generic Residential Cleanup Criteria (GRCC), then the purge water must be containerized and properly disposed of off-site.
- Permanent monitoring wells may be needed in deeper aquifers on-site to vertically delineate the plume. The need for these wells should be discussed with EGLE upon receipt of the vertical aquifer profiling (VAP) data.

If the above conditions are not met, EGLE approval of the Response Activity Plan is withdrawn. EGLE approval is also contingent upon Wolverine's timely implementation of the remedial action in accordance with the schedule provided in the Response Activity Plan.

This approval with conditions of the Response Activity Plan is based upon the representations and information contained in the submittal, therefore EGLE expresses no opinion as to whether other conditions that may exist will be adequately addressed by the response activities that are proposed. Notwithstanding this approval, if environmental contamination is found to exist that is not addressed by the Response Activity Plan and you are otherwise liable for the contamination, additional response activities may be necessary.

If you should have further questions or concerns, please contact Leah Gies, Remediation Division, Grand Rapids District Office, at 616-215-4781.

Sincerely,

Karen Vorce

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

cc/via email: Loretta Powers, CHMM, GZA

Brian A. Beach, CPG, GZA Dan Yordanich, EGLE Nancy Johnson, EGLE Leah Gies, EGLE Ashley Coplin, EGLE