

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY



C. HEIDI GRETHER
DIRECTOR

LANSING

November 2, 2017

VIA E-MAIL and HAND DELIVERED

Mr. Dave Latchana, Associate General Counsel Wolverine World Wide, Inc. 9341 Courtland Drive, NE Rockford, Michigan 49351

Dear Mr. Latchana:

SUBJECT: Wolverine World Wide, Inc. (Wolverine) PFAS Response

House Street, Plainfield Township, and Wolverine Tannery, 123 Main

Street, Rockford, Kent County, Michigan

The Department of Environmental Quality (DEQ) has evaluated the per- and polyfluoroalkyl substances (PFAS) contamination at the House Street disposal area, the former Tannery locations, and additional northern Kent County disposal sites. Numerous residential drinking water wells are impacted, and at present 22 wells have tested above the United States Environmental Protection Agency's (USEPA) Lifetime Health Advisory level of 70 parts per trillion (ppt) (combined) established for two PFAS compounds: per-fluorooctanonoic acids (PFOA) and per-fluorooctyl sulfonate (PFOS).

Since March of 2017, the DEQ has engaged with Wolverine to ensure that the voluntary activities the company is performing are protective of public health and consistent with regulatory requirements as identified by state and federal agencies.

The DEQ is requesting that Wolverine take additional actions as follows to (1) ensure that all residents have immediate access to safe drinking water; (2) identify all contaminant source areas; (3) characterize the nature and extent of PFAS contamination in the Rockford area; and (4) in collaboration with the health and medical community, ensure that residents in the impacted areas have access to appropriate health care resources to monitor health implications.

The DEQ is requesting the following actions:

Wolverine Former Tannery, 123 Main Street, Rockford:

- A. Develop a Work Plan and schedule to fully define the vertical and horizontal extent of impacts to groundwater, soils, surface water, and sediments by November 27, 2017.
- B. Provide all existing data from the Tannery Site to the DEQ by November 8, 2017.

C. Provide a conceptual site model that includes cross sections that locate former buildings and industrial piping runs, iso-concentration maps for both ammonia and PFAS separately, data tables, and all other relevant information by November 27, 2017.

Wolverine House Street Disposal Area, House Street, Belmont:

- D. Develop a Remedial Investigation (RI) Work Plan to fully define the vertical and horizontal extent of impacts to groundwater, soils, and surface water by November 27, 2017, including a schedule and a quality assurance plan. The RI Work Plan should also include details of the source area soil sampling, number of samples to be collected, surface water samples, maps, and supporting documentation for all activities, etc.
- E. Develop a Work Plan and schedule for installation of a monitoring well network as part of the RI Work Plan for the House Street disposal area by November 9, 2017, including:
 - 1. MDOT property:
 - Installation of monitoring wells to delineate the impact to groundwater.
 - Soil sampling after excavation is complete to determine the extent of residual impacts.
 - 2. MDOT right-of-way:
 - Installation of monitoring wells in the MDOT right-of-way along U.S. 131, by December 1, 2017, to assist in delineation of contamination to the aquifer.
 - 3. Southeast Expansion Area:
 - Installation of monitoring wells to delineate the vertical and horizontal impacts to groundwater and surface water.
 - Delineate potential impacts to the Rogue River at downgradient locations.
- F. Prepare a Conceptual Site Model for the House Street disposal area plume including cross-sections, iso-concentration maps, source area soil sampling, data tables, surface water samples, etc., by January 30, 2018.
- G. Provide weekly progress reports on project activities, including:
 - Summary of work accomplished
 - Work to be performed in next week
 - Maps of sampling areas
 - Data summaries
- H. Provide the DEQ the specifications for the whole house filters by November 27, 2017.
- I. Utilize a laboratory approved by the U.S. Department of Defense or provide documentation as to the performance specifications of laboratories selected by Wolverine to conduct sample analysis by November 30, 2017

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If you have any questions, feel free to contact Ms. Abigail Hendershott, Acting Grand Rapids District Supervisor, Remediation and Redevelopment Division, at 616-888-0528; hendershotta@michigan.gov; or DEQ, 350 Ottawa Avenue, NW, Unit 10, Grand Rapids, Michigan 49503.

Sincerely,

Susan Leeming

External Relations Deputy Director

517-284-6715

cc: Mr. Scott Hiipakka, Governor's Office

Ms. C. Heidi Grether, Director, DEQ

Mr. Michael McClellan, Environment Deputy Director, DEQ

Ms. Kathleen Shirey, DEQ Mr. David O'Donnell, DEQ

Ms. Abigail Hendershot, DEQ

Mr. Nate Zimmer, DEQ