



**Rose & Westra**  
A Division of GZA



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File No. 16.0062335.53  
December 22, 2017

Ms. Abigail Hendershott  
Acting District Supervisor – Remediation and Redevelopment Division  
Michigan Department of Environmental Quality  
350 Ottawa Avenue NW #10  
Grand Rapids, MI 49503

Re: Wolverine World Wide, Inc. – Alleged Disposal Areas  
Various Locations, Kent County, Michigan

Dear Ms. Hendershott:

Based on our November 20, 2017 Alleged Disposal Areas Work Plan, Wolverine Worldwide, Inc. (Wolverine) is providing the Michigan Department of Environmental Quality (MDEQ) the following required summary of response actions.

## **12 MILE AND WHITE PINE TRAIL**

This location is the former Rockford City Dump and, given this, there were obviously many sources of refuse. According to MDEQ, there is anecdotal evidence of disposal of Wolverine sludge at this location. Wolverine's interviews with its former employees, however, indicate it placed ordinary refuse in this city dump.

On November 22, 2017, R&W/GZA requested historical records from the City of Rockford regarding the former city dump. On November 27, 2017, the City of Rockford responded, referring R&W/GZA to Algoma Township.

On November 27, 2017, R&W/GZA requested historical records from Algoma Township for the former dump as well. On December 5, 2017 Algoma Township stated the FOIA was denied as no records are available.

On December 14, 2017, Algoma Township sent a follow up email to R&W/GZA indicating that they found some township board meeting minutes from 1961, 1966, and 1971 about a dump along 12 Mile Road. While not positive these refer to the 12 Mile/White Pine Trail dump, the provided records do not include any information pertaining to Wolverine.

## **ROGUE RIVER PARK**

According to MDEQ and media reports, drums of unknown origin were observed in the pond at Rogue River Park. These media reports show at least one drum connected to steel and wood as part of a dock. Empty, intact drums are frequently used for dock construction to provide buoyancy. Therefore, it is unlikely waste from any source would have been in these drums.



Moreover, R&W/GZA is not aware of any evidence these drums were associated with Wolverine, and we note side-bung drums like those observed are and were standard and commonly used in a variety of industries.

PFAS were not detected in samples collected on October 24, 2017 from the two wells located at the Park.

R&W/GZA also contacted Mr. Bob Papp at the Kent County Parks Department. On November 30, 2017, Mr. Papp provided the following:

- Kent County acquired the property in 1977. They are not aware of any historical waste disposal at the park and don't have reason to believe it ever occurred.
- *I assume your request for information was prompted by the County's 11/8/17 letter to the DEQ and Wolverine, in which it was stated, "We are aware of barrels in a gravel pit (underwater) on site. It appears that the barrels were placed to hold a dock in the water." It may help to know that this conclusion was drawn by simply observing aerial photos of the pond, and not from any historic records or recollections of docks (or swimming rafts) at the pond.*

*I'm attaching a collection of the aerial photos we looked at to arrive at this conclusion. In the first image you'll see three submerged structures. The one on the left is the one that appears to have barrels associated with it. Due to the regular spacing and placement of the barrels and the framing that appears to be around them, we concluded that this is likely the remains of a floating dock or swim raft that used empty barrels for flotation. The structure on the right against the shore appeared to us to be the decking of this dock or raft that may have broken loose and drifted to shore when the sub-structure sank. We don't have any guesses about the middle structure that looks like two boxes, but it doesn't appear to have any barrels associated with it.*

*Pages 2-5 are just different views of the structure seen on the left of page 1. You may also notice several circles in the mud throughout the pond. These are just old tires.*

On December 1, 2017, Mr. Roger Sabine with Kent County Parks provided the following additional information:

- *Also, we have a request from someone else in your firm for maintenance records for the park dating back many decades ... well before Kent County acquired the property. The initial land acquisition was in 1970. The second in 1977 and third in 1999. The third acquisition was actually done by the DNR and we simply managed their property as part of the park. Kent County received title that DNR property in 2014. We know that nothing has been dumped in the park since the park's inception. Other than volunteers that did pick up/ clean up of tires and miscellaneous objects, the Parks Dept does not have records of other routine or unusual maintenance. We do think that there is an old platform in a pond that people jumped off. That was the same conclusion as a person on the KC Sheriff dive team that waded into the water this fall. I have attached aerial photos for your review. That doesn't mean there isn't more that we don't know about, but that is our thinking at this point.*

The aerial photographs provided by Kent County are enclosed with this letter.

An extension was requested for additional response until December 20, 2017. As of this date we have not received any other additional information.



As you can see, we have completed the tasks outlined in the November 20, 2017 letter. Based on the information further identified, Wolverine does not anticipate or plan any further action for the WPT/12 Mile Road area.

Very truly yours,

Rose & Westra, a Division of GZA GeoEnvironmental, Inc.

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Associate Principal

maw/ljp

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Project Manager/Consultant Reviewer

c: Mr. Dave Latchana – Wolverine Worldwide, Inc. *via email David.Latchana@wwwinc.com*  
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