



Rose & Westra  
A Division of GZA

GEOTECHNICAL  
ENVIRONMENTAL  
ECOLOGICAL  
WATER  
CONSTRUCTION  
MANAGEMENT

The Widdcomb Building  
601 Fifth Street NW  
Suite 102  
Grand Rapids, MI 49504  
T: 616.956.6123  
F: 616.288.3327  
www.rosewestra.com  
www.gza.com



Sent Via Email: [hendershotta@michigan.gov](mailto:hendershotta@michigan.gov)

File No. 16.0062335.53

November 20, 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:

As requested in your letter dated November 9, 2017, Wolverine World Wide, Inc. (Wolverine) is providing the Michigan Department of Environmental Quality (MDEQ) the following Work Plan for additional response actions.

### **Jewell Avenue Area**

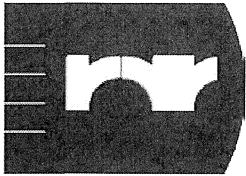
The November 9, 2017 letter references multiple sites along Jewell Avenue which are discussed below.

### **Jewell Avenue**

According to MDEQ reports, drums and leather scraps have been observed at this location. We have not yet visited this location to assess these reports, but will do so and conduct a gridded survey in the reported disposal area using a metal locator. If leather scraps are present, we will assume the leather and drum remnants are associated with Wolverine, and will offer to remove all waste from this area. If leather scraps are not present, however, and the drums do not contain leather/tanning waste, R&W/GZA is not aware of a way to identify if the reported drums are associated with Wolverine, and no removal activities will take place.

If removal is warranted, the landowner(s) give permission, and leather scrap is present, Wolverine will collect post-removal soil samples. If only metallic debris and drum remnants are removed, no post-removal testing will be performed unless stained or soil with unusual odor is present.

We are currently evaluating groundwater quality in this area by sampling approximately 50 residential wells. Wolverine is also providing bottled water to the homeowners during the sampling and evaluation process. Additional response actions in this area, if any, will be evaluated following receipt of the analytical results from the residential well sampling expected approximately mid-December. Therefore, we will provide another update to MDEQ on or before December 22, 2017.



### **[REDACTED] Jewell Farm (Soil Amendments)**

As stated previously, we are currently evaluating groundwater quality in this area. Additional response actions in this area, if any, will be evaluated following receipt of the analytical results from the residential well sampling.

### **House Street Area**

The November 9, 2017 letter references multiple sites near Wolverine's House Street property which are discussed below.

### **[REDACTED] House Street**

Debris, leather scraps, a rusted drum, and drum fragments were observed at this location. R&W/GZA did not identify evidence the drums were associated with Wolverine, but because leather scraps presumed to be from Wolverine are present, Wolverine will offer to remove this waste from this area.

R&W/GZA will use a metal locator in a grid pattern to assess if additional metal debris is located subgrade. The terrain of this area makes completion of an electromagnetic or ground penetrating radar survey of this area impractical. R&W/GZA will also collect one or more composite samples for waste characterization. Assuming prompt access to the property, we will complete these tasks by December 1, 2017

Once the extent of the debris is better defined and we have results of the waste characterization, Wolverine will offer to remove the debris (coordinating this effort with the landowner), collect post-removal verification samples, and install erosion control measures until natural vegetation can stabilize the soil.

### **[REDACTED] House Street**

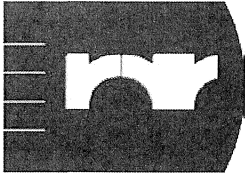
Drum fragments have been observed in the western portion of this property. This area is contiguous to the area of debris on the [REDACTED] House Street parcel. Leather was, however, not observed. A small depression in the ground surface was also reported and observed in the northeast corner of the property.

Additional assessment activities will include using a metal locator in a gridded pattern in the location of the drum fragments and depression. We will perform one test pit in the depression to assess the potential existence and extent of buried waste in these areas. Assuming prompt access to the property and weather suitable for performing the test pit without significant damage to existing landscaping, we will complete these tasks by December 8, 2017.

Once extent of the debris is better defined, Wolverine will discuss removal options with the landowner who expressed concerns about tree and brush removal necessary to remove the debris from the ravine.

### **[REDACTED] House Street**

MDEQ reports a farm dump in a ravine on this parcel. The disposal area includes drums. We are not aware of any evidence these drums are associated with Wolverine. Because the drums are near Wolverine's House Street property, however, Wolverine will coordinate removal of the drums if the property owner approves. Wolverine does not propose removing other debris or conducting post-removal sampling unless stained or soil with unusual odor is present. Assuming prompt access to the property and weather suitable for removal without significant erosion or track-out, we will complete the removal tasks by December 8, 2017.



### **House Street**

Debris has been observed in a small ravine on the north side of this property. Debris included a rusted drum and drum fragments, rusted pails, carpet, carpet padding, fabric, a rusted bed spring, wood, cinder blocks, and other miscellaneous trash. We understand neither MDEQ nor R&W/GZA observed leather or other debris associated with Wolverine's former tannery. Wolverine is not aware of any evidence this waste is associated with its former operations. Because the drums and drum fragments are near Wolverine's House Street property, however, Wolverine will coordinate removal of the drum and drum fragments if the property owner approves. Wolverine does not propose removing other debris or conducting post-removal sampling unless stained or soil with unusual odor is present. Assuming prompt access to the property and weather suitable for removal without significant erosion or track-out, we will complete the removal tasks by December 8, 2017.

### **Pine Island Drive**

Due to physical limitations of the property owner, we were unable to evaluate the presence of drums previously identified by MDEQ. We will arrange for a site visit in the spring and provide MDEQ an update.

### **Wolven Avenue Area**

The November 9, 2017 letter references multiple sites near Wolven Avenue which we discuss below.

#### **Former Cooper Farms (so-called Cooper Farm I, II, and III - Soil Amendments)**

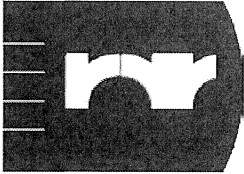
We are currently evaluating groundwater quality in the Wolven Avenue area by sampling approximately 200 residential wells. Wolverine is also providing bottled water to the homeowners during the sampling and evaluation process. We understand MDEQ also has pending investigations in this area. Additional response actions in this area, if any, will be evaluated following receipt of the analytical results from the residential well sampling. We will provide another update to MDEQ on or before January 29, 2018.

#### **Former Lamoreaux Farm (Soil Amendments)**

This former farm with reported Wolverine soil amendments is located adjacent to the Cooper Farms and is being evaluated in the same manner as the Cooper Farms. We understand MDEQ also has pending investigations in this area. Again, additional response actions in this area, if any, will be evaluated following receipt of the analytical results from the residential well sampling. We will provide another update to MDEQ on or before January 29, 2018.

### **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. R&W/GZA will request historical records from the City of Rockford regarding the former city dump. We will provide another update to MDEQ on or before December 22, 2017.



## 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 maximum 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. If you have evidence connecting these drums to Wolverine, please advise us.

On October 24, 2017, R&W/GZA collected samples from the two County-owned wells located at the park. We will evaluate the analytical results from these wells and complete an interview with County personnel to determine if any further action is warranted. We will provide another update to MDEQ on or before December 22, 2017.

Very truly yours,

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

Mark A. Westra  
Associate Principal

Loretta J. Powers  
Project Manager/Consultant Reviewer

maw/ljp

c: Mr. Dave Latchana – Wolverine World Wide, Inc. *via email* [David.Latchana@wwwinc.com](mailto:David.Latchana@wwwinc.com)  
Mr. John V. Byl – Warner Norcross & Judd LLP *via email* [jbyl@wnj.com](mailto:jbyl@wnj.com)

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