

**Summary of Public Comments**  
**and**  
**Department of Environment, Great Lakes, and Energy (EGLE) Responses**  
**to**  
**Wolverine World Wide, Inc.'s Proposed Response Activity Plan**  
**for**  
**Filter Operation and Maintenance**  
**Public Comment Period: May 14, 2020 – June 13, 2020**

<b>Commenter</b>	<b>Comment</b>	<b>EGLE Response</b>
Sandy Wynn-Stelt (Wolverine Community Advisory Group)	<p>Section 3.0 Communications with affected properties</p> <p>1. There are many websites listed that provide a wealth of information. However, there may still be community members that are not aware of those websites and are not able to access that material. This information would be hard to access if the property owner was not aware of these sites.</p> <ul style="list-style-type: none"> <li>• Suggestion: Since each residence with a POET system is provided with a reference card with contact information, it would be prudent to provide that list of websites as well, and the option to receive written information from these sites.</li> <li>• Suggestion: Periodical mailed updates and reminders should occur so that specific information is shared. This could occur via emails, sent with test results, etc.</li> </ul>	<p>EGLE agrees that it is important for residents who have filters, maintained by Wolverine, in their homes to have this information made available to the homeowner. EGLE will pass these two suggestions along to Wolverine in our response to their Draft Filter Operation and Maintenance (O&amp;M) Response Activity Plan, and encourage Wolverine to include those websites on the reference card, along with providing more periodic updates on the filter systems via mail or email, depending on the resident's preference.</p>

Commenter	Comment	EGLE Response
Sandy Wynn-Stelt (Wolverine Community Advisory Group)	<p>Section 3.0 Communications with affected properties</p> <p>2. There is no mention for how new owners will be provided information about POET systems, maintenance, and testing.</p> <ul style="list-style-type: none"> <li>• Suggestion: There have been reports of new homeowners not being aware of these systems. Realtors and sellers should be required to provide information about these systems prior to purchase of the homes.</li> </ul>	<p>EGLE agrees that new homeowners need to be made aware of the filtration systems. Per Michigan’s Seller Disclosure Act, Act 92 of 1993, a seller is required by law to notify any prospective buyer about the property’s physical condition, which would include the filtration systems Wolverine installed. In addition, Section 20116 of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, Act 451 of 1994, as amended, requires that a person who has knowledge that their real property is a “facility” shall provide written notice to the purchaser or other person to which the property is transferred disclosing the known general nature and extent of the hazardous substance release and any land or resource use restrictions (i.e., the Plainfield Charter Township or Algoma Township “Groundwater Use” ordinances) that are known by the person to apply. Wolverine should communicate this requirement to current homeowners, so that homeowners who sells their homes understand their obligation to share this information with purchasers. EGLE will share your suggestion and recommend this process be added into the Filter O&amp;M Plan.</p>
Sandy Wynn-Stelt (Wolverine Community Advisory Group)	<p>Section 4.3 POET System Startup</p> <p>1. It indicates that if the POET system remains dormant for more than three weeks, there is a system for restarting the system safely prior to use</p> <ul style="list-style-type: none"> <li>• Suggestion: This is new information and should be communicated with residents, especially since many residents may take extended vacations or winter in other areas. Responsible parties should develop a system to remind people of this start up need.</li> </ul>	<p>EGLE agrees that this system start up procedure needs to be communicated with residents who have a filter installed in their homes and maintained by Wolverine. This suggestion will be provided to Wolverine in EGLE’s response.</p>

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Sandy Wynn-Stelt (Wolverine Community Advisory Group)	<p>Section 5.5 GAC Vessel Change Out</p> <p>1. This indicates ‘a change out will be completed when total PFOS+PFOA concentrations in a sample from the mid-point port...are greater than 35 nanogram per liter (ng/L).</p> <ul style="list-style-type: none"> <li>• Suggestion: The criteria for change should be adjusted if the MCL’s are lowered. This should be noted to occur in the document.</li> <li>• Suggestions: The criteria for change should also include others PFAS class chemicals when they are included in the MCL changes that have been proposed.</li> </ul>	<p>EGLE agrees with your comment regarding future criteria. The Consent Decree requires Wolverine to maintain filters for homes that exceed any future drinking water criteria for any “PFAS compound” (list of compounds included in the Consent Decree), and Wolverine will need to update their Filter O&amp;M Plan to reflect that.</p> <p>Additionally, since it is anticipated that the Part 201 drinking water criteria for PFOA and PFOS will be less than 35 ppt when the new Maximum Contaminant Levels (MCLs) are promulgated, the trigger concentration of 35 ppt for GAC change-out will also need to be adjusted accordingly when the MCLs are promulgated.</p>
Jennifer Carney (Wolverine Community Advisory Group)	<p>4.3 Poet System Startup - If the POET system remains dormant for more than three weeks, water should be flushed for a minimum of 25 minutes or 200 gallons or more prior to any use.</p> <p><b>Comment:</b> POET installer should point this out to homeowner when installing. I didn't know this.</p>	<p>EGLE agrees that this system start up procedure needs to be communicated with residents who have a filter installed and maintained by Wolverine. This suggestion will be provided to Wolverine in EGLE’s response.</p>
Jennifer Carney (Wolverine Community Advisory Group)	<p>5.5 GAC Vessel Change Out</p> <p><b>Comment:</b> The lead canister can let 35ppt pass through okay because it’s assumed that the 35ppt will be taken out by the lag canister?</p>	<p>The mid-point trigger for Carbon Change Out was half the 70 ppt Part 201 Drinking Water Criteria, which is 35 ppt. The GAC in the first carbon canister(s) (also referred to as the lead canister(s)) will capture the majority of the PFAS compounds first, before the water reaches the second or lag canister(s). The second GAC canister is installed for redundancy and as a safety factor to catch any PFAS that may break-through the first canister(s) prior to change-out. This number will also need to be updated overtime to reflect any new applicable future criteria.</p>

Commenter	Comment	EGLE Response
Jennifer Carney (Wolverine Community Advisory Group)	6.10 Reporting <b>Comment:</b> The report should also be emailed or mailed to the homeowner	EGLE agrees with this comment and this suggestion will be provided to Wolverine in EGLE’s response.
Jennifer Carney (Wolverine Community Advisory Group)	7.10 Cessation <b>Comment:</b> My lead canister was recently changed, we are keeping our POET and will be connected to municipal in a month or so. GZA did not follow the installation of new canister with a water sample. A sample should be done after install to guarantee it is functioning correctly.	<p>Wolverine’s environmental consultant should have completed the system start up sampling approximately 2 weeks after the carbon was changed out.</p> <p>The two-week lag period for performance sampling is based on GZA’s understanding of carbon fines and the results they were seeing very early on in the installation and monitoring process conducted in 2017 and 2018 when the filters were first installed. Essentially, when the carbon canisters are moved around, the GAC becomes unsettled and carbon dust/fines can be released in the water for some time. The carbon dust/fines are collected in the second sediment filter before the water enters your home; however, the mid-point performance samples, collected between the lead and lag carbon canisters are not filtered. The mid-point sample may then contain dust/fines from the lead canister(s) and result in an inaccurate test result. While early start-up monitoring of effluent samples are unlikely to have the same issue as they are collected after the second sediment filter, GZA chose to maintain the two-week lag period for performance monitoring consistently across the systems.</p>