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A Division of GZA

GEOTECHNICAL

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August 13, 2020
File No. 16.0062961.50

Ms. Karen Vorce, Project Manager
Grand Rapids District Office
Remediation and Redevelopment Division
Michigan Department of Environment, Great Lakes, and Energy
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503
vorcek@michigan.gov

Re: Wolverine World Wide, Inc. Consent Decree Court Case No. 1:18-cv-00039
Notice Under Section 18.5(c) of the Consent Decree

Dear Ms. Vorce:

In response to EGLE's August 3, 2020, Notice of Approval with Conditions of the Groundwater-Surface Water Interface RAP (the "**Conditions**"), Rose & Westra, a Division of GZA GeoEnvironmental, Inc. (R&W/GZA) submits this notice on behalf of Wolverine World Wide, Inc. (Wolverine) under section 18.5(c) of the Wolverine Consent Decree (W.D. Mich. Case No. 1:18-cv-39).

• Section 3.01 HSDS Study Area:

- *EGLE expects that all piezometer locations will be sampled and analyzed for PFAS compounds, which should be stated in this section. Currently, the report states that piezometers will be used to measure PFOS and PFOA venting to the surface water, which can only be done through actual sampling.*

Objection: Section 2 of the GSI SOW that has already been approved by both EGLE and Court provides as follows: *The GSI piezometers will be used to collect static water levels which will be compared to staff gauges in the surface water body to demonstrate groundwater flow is toward the surface water and to evaluate groundwater flow pattern near the GSI.* Anything beyond that is beyond the scope of this RAP under the Consent Decree and would need to be contemplated as part of some other future action.

• Section 3.02 Wolven/Jewell Study Area:

- *EGLE expects that all piezometer locations will be sampled and analyzed for PFAS compounds, which should be stated in this section. Currently, the report states that piezometers will be used to measure PFOS and PFOA venting to the surface water, which can only be done through actual sampling.*

Objection: See response in Section 3.01.



- **Section 4.01 Piezometers:**

- *The piezometer installation standard operating procedures (SOP) are included, but a sampling SOP discussion for piezometers also needs to be included in this section, and included in Appendix B.*
- *Specify how long after the piezometers are installed that they are sampled.*
- *There is no mention of measurement of pH, temperature, conductivity, dissolved oxygen and oxidation-redox potential (ORP) from the GSI groundwater piezometer locations as discussed in Appendix S of the Consent Decree. Update this section to include this language.*

Objection: See response in Section 3.01.

- **Section 4.02 Pore Water Sampling:**

- *Sixth bullet: Update SOP A27 to include dissolved oxygen (DO) and oxidation-reduction potential (ORP) on the sampling sheet and indicate that 12 inches will be the shallowest depth that a pore water sample will be collected.*

Objection: We would like to discuss this with EGLE. The 12 inches for the shallowest depth will be added to the form. SOP A27 states the intent is to monitor for pH, temperature, specific conductivity, and turbidity but not DO and ORP.

- **Section 7.0 Investigation Derived Waste:**

- *Purge water collected from monitoring wells and piezometers as part of this investigation should be containerized and disposed of appropriately.*

Objection: Current practice and EGLE policy¹ is to discharge development water to the nearby ground surface. Wolverine intends to continue that accepted practice with the development water from the sampling of MW-19, MW-29A, and DEQ-MW-9.

We look forward to resolving these technical objections to the Conditions as contemplated under Section 18 of the Consent Decree. At your earliest convenience, please let us know your availability for a meeting to discuss the Conditions and our objections. If you have any questions, please contact us. Thank you.

Very truly yours,
Rose & Westra, a Division of GZA GeoEnvironmental, Inc.

Mark A. Westra
Principal

Loretta J. Powers
Senior Project Manager

c: Mr. Dave Latchana–Wolverine Worldwide, Inc. *via email David.Latchana@wwwinc.com*
Mr. John V. Byl–Warner Norcross & Judd LLP *via email jbyl@wnj.com*
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¹ Michigan Department of Environmental Quality. 1999. Interoffice Communication, Operation Memo Gen-10, Re: Purge Water Disposal from Well Sampling and Development. https://www.michigan.gov/documents/deq/deq-whm-hwp-Op-Memo-Gen-10-Rev1_235127_7.pdf