



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

April 29, 2019

Wolverine Worldwide, Inc.  
c/o Mr. David A. Latchana (david.latchana@wwwinc.com)  
Associate General Counsel for Wolverine World Wide, Inc.  
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Rose & Westra, a Division of GZA  
c/o Mr. Mark A. Westra (Mark.Westra@gza.com)  
Project Coordinator  
601 Fifth St., NW  
Suite 102  
Grand Rapids, MI 49504

Via Email delivery

**Re: Wolverine Tannery and House Street Disposal State: Required CERCLA Actions**

Dear Mr. Latchana and Mr. Westra,

Thank you for meeting with us on April 17<sup>th</sup>, 2019, and for hosting the meeting at Wolverine World Wide, Inc's, offices in Rockford, Michigan. At the meeting the next steps for the project were discussed. The following summarizes and solidifies the direction you received that day.

The U.S. Environmental Protection Agency (EPA) has reviewed the data from the 2018 extent of contamination surveys at the former Wolverine Tannery and House Street Disposal locations pursuant to the January 10, 2018, Unilateral Administrative Order from EPA to Wolverine World Wide, Inc. (WWW).

As outlined in the Order, the OSC has determined, based on the data, what actions need to be undertaken to complete Time-Critical cleanup actions at both properties. The OSC has also taken steps to continue data review and collection to support non-Time Critical Actions and other actions that may need to occur. This document does not consider or discuss all Non-Time Critical Actions which need, or may need, to be implemented before the response action can be determined to be complete.

These actions shall be commenced without delay:

1. Develop and implement a workplan or, if more feasible, separate workplans, for the former tannery property and House Street property if that is more feasible, to satisfy the work requirements of the following actions.
2. Amend the on-site Health and Safety Plan to include the new work activities and hazards associated with the Time-Critical Removal Actions.

3. Develop and implement an air monitoring plan for use during cleanup activities for protection of workers and the public. This plan shall consider the hazards that may be encountered during cleanup and at a minimum shall monitor for volatile organic compounds and particulates.
4. Define, excavate, and dispose of off site the contaminated soils at the two known areas of TCLP metals waste at the Tannery and the five such areas at the House Street property, and conduct confirmation sampling. If, as this work progresses, you encounter additional areas of TCLP waste whose contaminant concentrations exceed their constituents' corresponding hazardous waste levels, those areas shall be subject to this removal process as well.
5. Deliver to EPA, for its prior approval, a map of the areas of contaminated shallow soils (0-3 feet bgs) situated west of the tannery and adjacent to the paved trail and the Rogue River whose contaminant concentrations exceed EPA RMLs and/or MI Part 201 for Direct Contact (residential) criteria, or show visual evidence of Wolverine waste materials' presence. The map must be based on sampling data gathered to date and use an appropriate modeling method, and the OSC will resolve any dispute over the map's particulars. Upon EPA's approval of the map, excavate, and dispose of off site the contaminated soils in these areas. In addition, restore these areas to natural habitat using an experienced restoration contractor.
6. Excavate, and dispose of off site, the shallow soils in several areas of the tannery property in which contaminants exceed RML/Part 201 criteria for several compounds. As with 5. above, a map of the areas to be excavated, based on the data and using an appropriate modeling method, shall be delivered to EPA and approved by EPA prior to excavation activities. The OSC will resolve any dispute over the final area to be excavated based on the data.
7. Dredge sediment, or sheet pile and dig "in the dry", along the near shore areas of the Rogue River and adjacent to the former tannery property, including the official and unofficial access points used by residents, as directed by the OSC and as determined by visual evidence of Wolverine waste materials' presence and supported by the sampling data.
8. Place large signage and information kiosks along the White Pine Trail and at access points – Signs and/or pamphlets in the kiosks should include information on contamination, proper hygiene and phone numbers for Wolverine and the Kent County Health Department. The OSC shall have final approval of all language and size dimensions for signage and information leaflets or pamphlets. Once installed, the Responsible Party shall maintain enough inventory of information in the kiosks at all time and shall develop a maintenance strategy to ensure this occurs.
  - a. By May 6, 2019, provide to the OSC language and size dimensions for signage to be placed along White Pine Trail and the number and locations of signage proposed. The signs should advise on contamination and avoidance of exposure (care to wash after use etc..) The OSC plans to have the Health Agencies assist EPA with final language review.
  - b. By May 13, 2019, provide to the OSC designs for information kiosks at access areas near the tannery property and along the trail that will serve to hold information pamphlets for the public. Develop a pamphlet explaining the investigation work, a summary of results, and proper hygiene procedures and also

provide this language by May 13, 2019. Include phone numbers for Wolverine World Wide, Inc. and the Kent County Health Department.

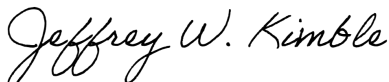
- c. By May 27, 2019, begin installing signs/sign posts along the trail in visible areas.
  - d. By June 3, 2019, begin placing kiosks near river access areas.
  - e. This work may proceed ahead of having the approved workplan for the Tannery and adjacent property, contingent on OSC approvals as discussed in 8.
9. Completely fence the entire contaminated portion of the House Street dump property to prevent unauthorized access. This includes contaminated soils, not just observed waste layers. The details of the fencing, including height, tie-ins to the ground, the signage size, language and sign spacing, and other physical attributes will be detailed in the workplan mentioned above. The OSC will approve the final version of sign size and language.
  10. Investigate the property directly adjacent to the west of the House Street property (waste was not “bound” in SW corner of site and may extend onto neighboring property).
  11. Investigate the suspected wetland area adjacent to the west of the House Street property to see if contamination in the perched water has migrated downgradient. Sample the perched water/soils on the slope between the waste areas and wetland area(s)

EPA re-asserts that undertaking these Time-Critical Actions do not complete the activities at either property; more work will remain. These actions are being ordered to limit the identified contaminants’ immediate threats and exposure risks to the public, and to reduce the ecological impacts until more encompassing cleanup work or other long-term remedies can be established.

EPA directs you to submit the proposed workplans within 30 days from your receipt of this letter. EPA will provide timely review and approval, with modifications if necessary, shortly after your submittal. Wolverine and its contractors and consultants should be prepared to mobilize within one week of receiving the plans from EPA, since constructions season is essentially upon us.

EPA plans to share the workplans and other documents being developed with our partners at Department of Environment, Great Lakes and Energy (formerly MDEQ) so that overall project coordination continues. If you have any questions regarding this letter, please contact me immediately at (734) 692-7688.

Sincerely,



Jeffrey Kimble  
Federal On-Scene Coordinator  
U.S. EPA, Region 5

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