



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

May 31, 2018

VIA E-MAIL AND U.S. MAIL

Mr. Dave Latchana  
Wolverine World Wide, Inc.  
9341 Courtland Drive, NE  
Rockford, Michigan 49341

Dear Mr. Latchana:

**SUBJECT:** Tannery-Wolverine World Wide, Inc. (Wolverine) Per- and Polyfluoroalkyl Substances (PFAS) Response to "*Draft Removal Work Plan for the Tannery, Rockford, Kent County, Michigan: Approval with Modifications dated April 24, 2018,*" hereafter renamed "Extent of Contamination Study Removal Work Plan, Former Wolverine Tannery, Rockford, Michigan"

Since the beginning of 2018, the Department of Environmental Quality (DEQ), Remediation and Redevelopment Division has worked closely with the United States Environmental Protection Agency Region 5 (USEPA) to coordinate activities at the Tannery (also known as Wolverine Leathers) at 123 North Main Street, Rockford, Michigan.

As part of that direct collaboration, the DEQ reviewed the document titled "*Draft Removal Work Plan for the Tannery, Rockford, Kent County, Michigan dated April 24, 2018*" submitted to the USEPA as required under the January 10, 2018, Unilateral Administrative Order from EPA to Wolverine and has the following requirements for the upcoming on-site investigations:

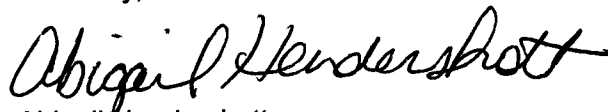
1. For every sample collected by Wolverine as part of the "Extent of Contamination Study Removal Work Plan, Former Wolverine Tannery, Rockford, Michigan" targeting contaminants of concern as defined by the USEPA, an additional sample will be collected for PFAS analysis at the same interval and location and for all media, for incorporation into Wolverine's ongoing investigation and analysis of PFAS in the vicinity of the Tannery. This requirement will apply to all soil, sediment, groundwater, surface water and waste samples. This data will provide a baseline to determine the scope of PFAS impact to the soils and groundwater at and near the Tannery. Once the data is compiled and incorporated into the Conceptual Site Model by Wolverine, the DEQ can determine if additional information is needed to fully assess the risks posed by the Tannery facility. This analysis is part of the investigation and response actions that the DEQ seeks under the pending Complaint and the DEQ will incorporate these sampling and analysis requirements into the eventual framework governing Wolverine's compliance with Michigan law.

2. Provide a Work Plan to the DEQ which clearly identifies the anticipated boring locations, monitoring well locations and other investigative activities as required by the "Extent of Contamination Study Removal Work Plan, Former Wolverine Tannery, Rockford, Michigan." This work plan should include:
  - a. A copy of the final approved "Extent of Contamination Study Removal Work Plan, Former Wolverine Tannery, Rockford, Michigan" as provided to the USEPA on May 29, 2018.
  - b. All existing PFAS sampling data collected to date at the Tannery compiled into appropriate tables, maps, figures and cross sections. This data should include monitoring well results, pore water sampling results, soil sampling, surface water sampling, leather/debris/waste sampling and all boring logs or soil profiling information.
  - c. A current PFAS isoconcentration map for all on-site monitoring wells specific to the well screen elevation.
  - d. A proposal for additional investigative activities to vertically and horizontally define off-site groundwater contamination, including but not limited to; additional monitoring wells, Vertical Aquifer Sampling, a schedule for periodic sampling to determine groundwater concentration trends, static water level elevation information, surface water elevation measurements, etc. In addition, the investigation should be extensive enough to determine how the on-site PFAS impacted groundwater is behaving and impacting the Rogue River.
  - e. A full pathway analysis for PFAS and identify all potential risks.
  - f. Any other relevant PFAS information associated with the Tannery.

The DEQ is expecting implementation of the PFAS sampling to be conducted concurrently with the data collection identified in the "Extent of Contamination Study Removal Work Plan, Former Wolverine Tannery, Rockford, Michigan." Since the USEPA has mandated that the assessment activities begin the week of June 11, 2018, the DEQ is requesting that the items described in Paragraph 2.a - 2.b be submitted by June 15, 2018, and that the items described in 2.c - 2.f be submitted no later than June 30, 2018.

If you have any questions or concerns related to this request, please contact me at your earliest convenience at the Grand Rapids District Office at the contact information below.

Sincerely,



Abigail Hendershott  
District Supervisor  
Remediation and Redevelopment Division  
Department of Environmental Quality  
616-888-0528  
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Mr. Dave Latchana

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cc: Ms. Carol Isaacs, Governor's Office  
Mr. Scott Hiipakka, Governor's Office  
Ms. Polly Synk, Department of Attorney General  
Ms. C. Heidi Grether, Director, DEQ  
Mr. Nate Zimmer, Chief of Staff, DEQ  
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Ms. Mel Brown, Communications Director, DEQ  
Mr. Michael McClellan, Environment Deputy Director, DEQ  
Ms. Kathy Shirey, DEQ  
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