



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 28, 2019

VIA E-MAIL AND U.S. MAIL

Mr. Dave Latchana
Wolverine World Wide, Inc.
9341 Courtland Drive, NE
Rockford, Michigan 49351

Dear Mr. Latchana:

SUBJECT: Wolverine World Wide, Inc. Per- and Polyfluoroalkyl Substances (PFAS)
Response - Notice of Public Expenditure
Kent County, Michigan

This letter is a formal notice that:

1. The Department of Environmental Quality (DEQ) has identified the House Street Disposal Site (1850 House Street, Belmont, Kent County, Michigan), former Wolverine World Wide Tannery Site (123 North Main Street, Rockford, Kent County, Michigan), and the Wolven/Jewell Study Area (study area north of 10 Mile Road, Algoma Township, Kent County, Michigan) as places where hazardous substances exceed the concentrations which satisfy the cleanup criteria for unrestricted residential use as provided in Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). Pursuant to Part 201, the House Street Disposal Site, former Wolverine World Wide Tannery Site, and the Wolven/Jewell Study Area are each a facility (Facility).
2. The Legislature has authorized the expenditure of public funds for the purpose of performing response activities at the facilities to protect the public health, safety, and welfare, and the environment.

Records and/or information obtained by the DEQ indicate that Wolverine World Wide, Inc. (Wolverine) currently owns, previously owned, previously operated at, currently operates at, transported hazardous substances to, or arranged for disposal of hazardous substances at the House Street Disposal Site, former Tannery Site, and the Wolven/Jewell Study Area.

The DEQ considers the groundwater contamination at and emanating from the former Tannery Site, House Street Disposal Site, and the Wolven/Jewell study area to be a threat to the public health, safety, or welfare, or the environment.

State law, including Part 201, authorizes the DEQ to use public funds to undertake actions to protect the public health, safety, and welfare, and the environment. Except as otherwise provided by 201, a person who is liable under Section 20126 of the NREPA is jointly and severally liable for all costs, including any associated interest, that are lawfully incurred by the State relating to the selection and implementation of a response activity under Part 201. Costs recoverable by the DEQ include costs associated with response activities specified by

Sections 20107a, 20114, 20118, 20120a, 20120b, 20120c, 20120d and 20120e of the NREPA and Part 10 of the Part 201 Administrative Rules. Pursuant to state, federal, or common law, including Sections 20126a and 3115(2) of the NREPA, MCL 324.20126a and 324.3115(2), a liable person is subject to cost recovery actions by the State for all response activity costs incurred by the State at a facility.

Please be advised that this letter serves as formal notice that the DEQ has developed a scope of work for the performance of additional response activities at the facilities identified in this letter and is prepared to proceed with the contract award.

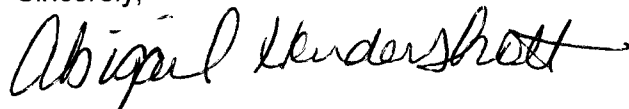
The DEQ's scope of work that includes the implementation schedule is attached. The scope of work requires 61 monitoring wells to be installed at 11 different locations. The justification for the identified wells is specified in the attached scope of work.

Because Wolverine will be liable for the costs the State incurs if the State performs these response activities, the DEQ is providing Wolverine the opportunity to voluntarily perform these response activities in accordance with the attached scope of work and implementation schedule. If Wolverine decides to commit to performing these response activities in accordance with the attached scope of work and implementation schedule, Wolverine must provide me with a written commitment to that effect by **March 8, 2019**. If Wolverine does not commit to performing these response activities by **March 8, 2019**, or does not complete these response activities in accordance with the implementation schedule provided in the attached scope of work, the DEQ will proceed with its implementation of the response activities in the scope of work. If the DEQ performs these response activities, please be advised that the DEQ may request assistance from the Department of Attorney General to recover from the liable persons any costs that are incurred by the State to perform these response activities, including any costs and associated interest that are incurred to develop, execute, oversee, or cancel any state contracts for the performance of these response activities.

A copy of this notice is being provided to the local unit of government in which the Wolverine facilities are located (Algoma Township, Plainfield Township, and the City of Rockford).

The files used to prepare this notice are located in the DEQ Grand Rapids District Office. If a representative of Wolverine wishes to review these files or has questions regarding this letter, please contact Ms. Abigail Hendershott, District Supervisor, Grand Rapids District Office, Remediation and Redevelopment Division, at 616-888-0528; HendershottA@michigan.gov; or DEQ, 350 Ottawa Avenue, NW, Unit 10, Grand Rapids, Michigan 49503-2341.

Sincerely,



Abigail Hendershott
District Supervisor
Grand Rapids District Office
Remediation and Redevelopment Division
616-888-0528
HendershottA@michigan.gov

Attachment

cc/att: Mr. Kevin Green, Supervisor, Algoma Township
Mr. Cameron Van Wyngarden, Superintendent, Plainfield Charter Township
Mr. Thad Beard, City Manager, City of Rockford
Ms. Polly Synk, Department of Attorney General
Mr. Steve Sliver, MPART Executive Director, DEQ
Ms. Susan Leeming, DEQ
Mr. David O'Donnell, DEQ
Ms. Karen Vorce, DEQ
Ms. Lisa Agosta, DEQ

February 2019 MDEQ Drilling Scope of Work - Wolverine World Wide

Synopsis: These proposed drilling activities by the Department of Environmental Quality are being conducted to better assess plume dynamics from Wolverine World Wide disposal of PFAS containing wastes at two locations (House Street and Wellington Ridge), as well as to ascertain a better understanding of the geology and hydrogeology in the areas of PFAS impact. A higher level of comprehensive data is needed due to the lack of municipal water currently in the impacted areas. Drilling will be conducted at 11 locations (see Figure 1 for locations). Soil sampling will occur at 1 location and up to a total of 61 monitor wells will be installed with a total proposed 1650 feet of drilling. All monitor wells will be 2-inch with 5-foot screens and will be gamma ray logged.

PMW12019-A:

Location: Proposed at ██████ Belmont Ave NE.

Schedule: Installed by May 15, 2019.

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 25-30, 30-35, and two depths to be determined. Total proposed depth to 150' bgs.

VAS: Yes

Purpose: To assess PFAS impact to the SE Extension area (Belmont). LIDAR indicates a possible channel south from the primary House Street plume that this well nest may aid in defining.

PMW12019-B:

Location: Proposed in the Rogue River Park parking lot.

Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 25-30, 30-35, and two depths to be determined. Total proposed depth to 150' bgs.

VAS: Yes

Purpose: To assess PFAS impact to the SE Extension area (Belmont). This nested set will be used to assess impact that may have come from the sanitary sewer line from Rockford that Wolverine World Wide leased capacity and had documented issues with Wolverine World Wide wastes.

February 2019 MDEQ Drilling Scope of Work - Wolverine World Wide

PMW12019-C:

Location: Proposed in the Rogue River Park along the river.

Schedule: Installed by May 15, 2019

Drilling Method: Geoprobe; nested sets

Target Depth(s): Water table, 25-30, 30-35 and one depth to be determined. Maximum depth 50'.

VAS: No

Purpose: To assess the behavior of the primary House Street PFAS plume immediately at the Rogue River.

PMW12019-D:

Location: Proposed in Plainfield Charter Township park at 6205 Packer SE.

Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 25-30, 30-35, and two depths to be determined. Total proposed depth to 150'bgs.

VAS: Yes

Purpose: To assess PFAS impact to the area east of the Rogue River. This nested set is in line with the House Street plume and north of an area of known impact.

PMW12019-E:

Location: Proposed in the Plainfield Charter Township cemetery.

Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 25-30, 30-35, and two depths to be determined. Total proposed depth to 150'bgs.

VAS: Yes

Purpose: To assess PFAS impact to the area east of the Rogue River. This nested set is southeast of the plume and brackets impact to the north with PMW12019-D.

February 2019 MDEQ Drilling Scope of Work - Wolverine World Wide

PMW12019-F:

Location: Proposed at [REDACTED] 10 Mile Road NE.

Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 67-72, 83-91, and one depth to be determined. Total depth proposed to 150'.

VAS: No

Purpose: To assess PFAS impact from the PFAs plume that runs northwest from the House Street Disposal site. This nested set is north of known moderate total PFAS impact.

PMW12019-G:

Location: Proposed at [REDACTED] Riverwatch Road NE.

Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 20-25, 25-30, 35-40, and one other depth. Total depth proposed to 175'.

VAS: Yes

Purpose: To assess impact the PFAS impact from the Wolven-Jewell source area to the Wolven Northeast area and to the Rogue River.

PMW12019-H:

Location: Proposed at [REDACTED] Summit Avenue NE.

Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 20-25, 25-30, 35-40, and one other depth. Total depth proposed to 175'.

VAS: Yes

Purpose: To assess impact the PFAS impact from the Wolven-Jewell source area to the Wolven Northeast area and to the Rogue River.

February 2019 MDEQ Drilling Scope of Work - Wolverine World Wide

PMW12019-I:

Location: Proposed at [REDACTED] Algoma Avenue NE.

Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 40-45, 45-50, 50-55, 55-60, 60-65, 65-70, 70-75, 75-80 and one other depth. Total depth of boring to 150'.

VAS: Yes

Purpose: To assess PFAS impact from the primary Wolven-Jewell source area plume between areas of exceedances.

PMW12019-J:

Location: Proposed at [REDACTED] 11 Mile Road NE.

Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

Target Depth(s): Water table, 35-40, 40-45, 107-117 and two other depths. Total depth to 150'.

VAS: Yes

Purpose: To be installed as close to the existing drinking water well as possible to assess the high PFAS impact to the aquifer at this location and to collect vadose zone soil samples.

PMW12019-K:

Location: Proposed in the Wellington Ridge neighborhood common area west of south Lady Lauren.

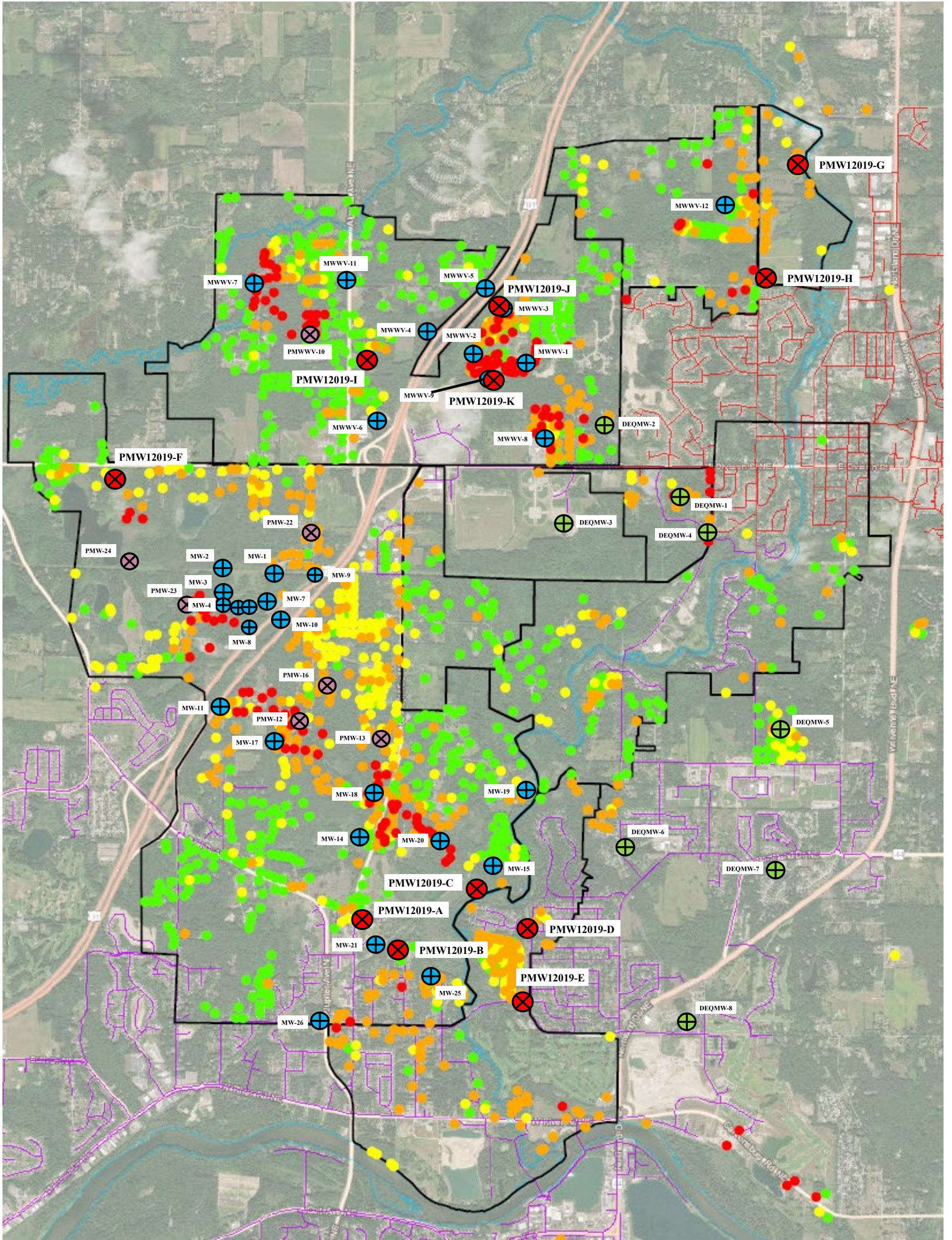
Schedule: Installed by May 15, 2019

Drilling Method: Sonic; nested sets

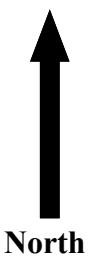
Target Depth(s): Water table, 75-80, 85-90, 115-120, 120-125, 120-130, 143-148. Total depth to 200 or competent clay after 150'.

VAS: Yes

Purpose: To install a nested set of monitor wells across all zones of vertical impact.



Map extracted from 1-2019 Total PFAS AECOM HEAT Map



⊗ Proposed Nested Monitor Well Locations (11 locations-61 wells)

⊕ MDEQ-RRD Nested Monitor Well Locations (8 location [24 wells])

⊕ WW Nested Monitor Well Locations (House Street-20 locations [48 wells]; Wolven Jewell-11 locations [21 wells])

⊗ WW Proposed Monitor Well Locations (House Street-6; Wolven Jewell-6{not all locations have been provided to DEQ-RRD})

**Figure 1 -Proposed Boring Locations
Propose to WW—February 2019
Algoma-Plainfield Townships MI**

Updated by the MDEQ-RRD-GR 2/19/2019