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DRAFT



MEMORANDUM

To: Karen Vorce, EGLE
From: Loretta Powers, R&W/GZA
Date: May 15, 2018, Revised April 6, 2020
File No.: 16.0062335.51/16.0062961.60

Disclaimer: This document is a DRAFT document that has not received approval from the Michigan Department of Environment, Great Lakes, and Energy (EGLE). This document was prepared pursuant to a court Consent Decree. The opinions, findings and conclusions expressed are those of the authors and not those of EGLE.

Re: Aquasana 5300+ Point-of-Use Filtration Maintenance

This memorandum pertains to Aquasana 5300+ point-of-use (POU) filters installed in the North Kent Study Area (NKSA) at residences by Wolverine World Wide, Inc. (Wolverine). This memorandum was updated April 6, 2020 to address changes established in the Consent Decree No. 1:18-cv-00039-JTM-ESC (CD), effective February 19, 2020. The changes made to the POU filter Operation and Maintenance (O&M) are established in Section 7.5 and Appendix L of the CD. The CD establishes both filter and municipal water areas within the NKSA. Refer to the CD for additional definition of these areas.

Aquasana 5300+ POU filters are an activated carbon-based filtration system with NSF International certification for the reduction of perfluoro-n-octanoic acid and perfluorooctane sulfonic acid (PFOA+PFOS) to below 70 parts per trillion (ppt) for influent concentrations up to 1,500 ppt. The POU installed at locations with over 1,500 ppt influent PFOS+PFOA are installed after a point-of-entry treatment filter system. POU systems are not the stand-alone filtration for locations with influent concentrations above 1,500 ppt PFOS+PFOA.

The POU filter life is 800 gallons (approximately six months of typical use). There is a meter in the POU filter that alerts (via either auditory beep, flashing light, or mobile app) when it is time to replace the filter cartridges if the 800-gallon flow occurs before the six-month life expectancy.

R&W/GZA tracked POU filter installation dates. Prior to the effective date of the CD, approximately two weeks prior to the six-month mark, R&W/GZA contacted residents to provide the replacement cartridges. If a filter replacement was needed prior to the six-month schedule (i.e., usage tracking alerts the residents), the residents were instructed to contact R&W/GZA or Wolverine and replacement cartridges were dropped off.

As of the effective date of the CD, the following POU protocol will be implemented and followed:

- In filter areas at residences where influent concentrations are above 10 ppt for PFOS+PFOA as well as in municipal water areas, Wolverine will continue to provide replacement cartridges for the POU filters, as specified by manufacturer. Two sets of replacement cartridges will be provided each year to each residence. Wolverine will stop providing POU replacement cartridges when an individual residence is connected to municipal water. Additionally, if connected to municipal water, Wolverine will offer to remove the POU filter at Wolverine’s expense, or the resident may choose to keep it if they assume O&M.



- In filter areas, if a parcel has not had PFOS+PFOA concentrations exceeding 10 ppt, Wolverine will offer to remove the POU filter at Wolverine's expense, or the resident may choose to keep it if they assume O&M.
- In filter areas, if a parcel is resampled and the PFOS+PFOA is greater than 10 ppt or other applicable PFAS criterion is identified as defined in the CD, that resident will be offered a POU filter which Wolverine will maintain as stated above.

According to the EGLE's December 5, 2017 Fact Sheet: PFAS In-Home Filtration Systems, the POU granular activated carbon filters are general household refuse and can be disposed of as such in the resident's refuse to be removed and disposed in a licensed landfill. If a resident does not have refuse service, they may request removal of the spent filters.

Consistent with procedures used by EGLE/MDHHS/County health departments in areas of Michigan where they have provided POU filters, Wolverine will not be conducting performance monitoring of the POU's. Based on the NSF certification, the manufacturer recommended maintenance, and understood operating protocols at other locations in Michigan where these POU filters are being used. This POU maintenance program is sufficient for the Wolverine-installed POU filter systems.

R&W/GZA will continue to provide POU filter installation addresses and dates to EGLE through GIS data updates to AECOM. R&W/GZA will also continue to track replacement cartridge distribution and provide that information to EGLE via the GIS updates as well.

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