



Rose & Westra
A Division of GZA

GEOTECHNICAL
ENVIRONMENTAL
ECOLOGICAL
WATER
CONSTRUCTION
MANAGEMENT

The Widdicomb Building
601 Fifth Street NW
Suite 102
Grand Rapids, MI 49504
T: 616.956.6123
F: 616.288.3327
www.rosewestra.com
www.gza.com



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Sent Via Email: hendershotta@michigan.gov

March 8, 2019
File: 16.0062335.60

Ms. Abigail Hendershott
Michigan Department of Environmental Quality
5th Floor – Unit 10
350 Ottawa Avenue NE
Grand Rapids, MI 49503

Re: Wolverine World Wide, Inc. (Wolverine)
Response to Wolverine World Wide, Inc. Per- and Polyfluoroalkyl Substances (PFAS)
Notice of Public Expenditure

Dear Ms. Hendershott:

This letter is in response to your letter dated February 28, 2019, which requests additional drilling activities at 11 locations in and near the Wolven/Jewell and House Street investigation areas. At our request, the DEQ met with us on March 4 to discuss questions we had regarding the scope of activities. The following is a list of issues identified after reviewing the information provided with the letter and during our meeting, as it pertains to this scope of work.

- The maps used by the DEQ to develop this scope of work are based on total PFAS concentrations, not PFOA+PFOS, which are the only PFAS compounds that have Part 201 drinking water criteria. In short, the maps don't reflect a regulatory basis for the work.
- Location "B" does not have a hydrogeological reason but is proposed to evaluate the Kent County sanitary line. You noted that you have a report that shows that the line was historically blocked with WWW waste. We requested the report.
- DEQ has not arranged for access to any proposed drilling locations but is willing to assist in gaining access for work that Wolverine performs.
- During our discussion about drilling, vertical profiling, and well depths, you agreed that the approach may vary from what is proposed in the letter (i.e., depths of wells can be determined based on field data with DEQ approval).
- The May 15, 2019 completion date may not be achievable, based on property access and rig availability. You agreed it is not a hard date as long as progress is being made and at least two rigs are used if available and when access allows.
- As we discussed, several of the locations are premature at this stage of the investigation. In addition, the number of wells in some of the nested sets is in excess of anything that is typical or that we have seen at other sites in the past.



- We have only received four CSMs, one for Wolven/Jewell, one for Wellington Ridge, one for Wolven Northeast, and one for the North Childsdale area. DEQ prioritized CSMs for Wolven/Jewell because the area is more geologically complex and there was less information. The House street CSMs are not complete and DEQ won't provide them until finalized.
- R&W/GZA requested the residential well depth and groundwater modeling data used for determining the proposed well screen intervals. This is requested for all proposed monitoring wells but is specifically requested as the MDEQ prepared CSM(s) for House Street are not yet available.

We look forward to receiving the additional information.

Sincerely,

Rose & Westra, a Division of GZA GeoEnvironmental, Inc.

Leslie M. Nelson, P.E.
Senior Project Manager

Loretta J. Powers
Senior Project Manager

Mark A. Westra
Associate Principal

lmn/maw

c: Mr. Dave Latchana – Wolverine World Wide, Inc.
Mr. John V. Byl – Warner Norcross & Judd LLP

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