



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

October 18, 2022

VIA E-MAIL & VIA USPS

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

Dear Mr. Latchana:

SUBJECT: Notice of Approval with Conditions of the Work Plan – Final Remedy for the House Street Property as Required by the Wolverine World Wide, Inc.  
Consent Decree Court Case No. 1:18-cv-00039

The Michigan Department of Environment, Great Lakes and Energy (EGLE), Remediation and Redevelopment Division, has reviewed the Revised Work Plan – Final Remedy for the House Street Property (Work Plan) located at 1855 House Street, Plainfield Township, Michigan. The original Work Plan was submitted on April 26, 2022, and subsequently updated to include some missing pages on May 26, 2022.

As outlined in Section 15 of the Consent Decree, after receipt of any submission relating to Response Activities that is required to be submitted for approval, EGLE may notify the Defendant that the plan is approved with conditions if applicable. The May 26, 2022, Work Plan – Final Remedy for the House Street Property has been approved with the following conditions:

**1. Landscape Plan (Table 3 and Appendix C)**

- a. Please update the text of the Work Plan to include discussion of the details provided on the landscaping plan figures included within Appendix C. As required by Part 115, it is understood that the landscaping plan will provide for sufficient vegetation to ensure the integrity of the cap while also providing a natural barrier along select House Street Property boundaries for visual screening purposes.
- b. The existing fence should be referred to as “existing chain link fence” on the landscaping plan figures. It is EGLE’s understanding that once construction is completed, the existing chain link fence will be replaced with a different type of fencing that will be determined based on the final site condition and will take into account input from the community and appropriate local, state, and federal agencies.



**2. LandGEM Model (Section 4.1.1 Air Quality Regulations)**

- a. Include the LandGem model as an attachment to the final Work Plan submittal.

**3. Soil Erosion and Sedimentation Control (SESC) Permit (Section 4.1.2)**

- a. Update the Work Plan in appropriate sections related to soil erosion control to clarify that the SESC permit will dictate the amount of destabilized soil allowed to be exposed at a given time and that these permit requirements will be adhered to by the contractor.
- b. Additionally, clarify in the text that tree roots and topsoil will be left in place to stabilize the soil until the area is scheduled for work. Following the completion of work in a particular area, the soil will be stabilized in accordance with the SESC permit.

**4. Waste Regulations 4.1.4**

- a. Mention in the text that Part 115 is an Applicable or Relevant and Appropriate Requirement (ARAR).

**5. Air Monitoring (Section 4.3.3. and Appendix C)**

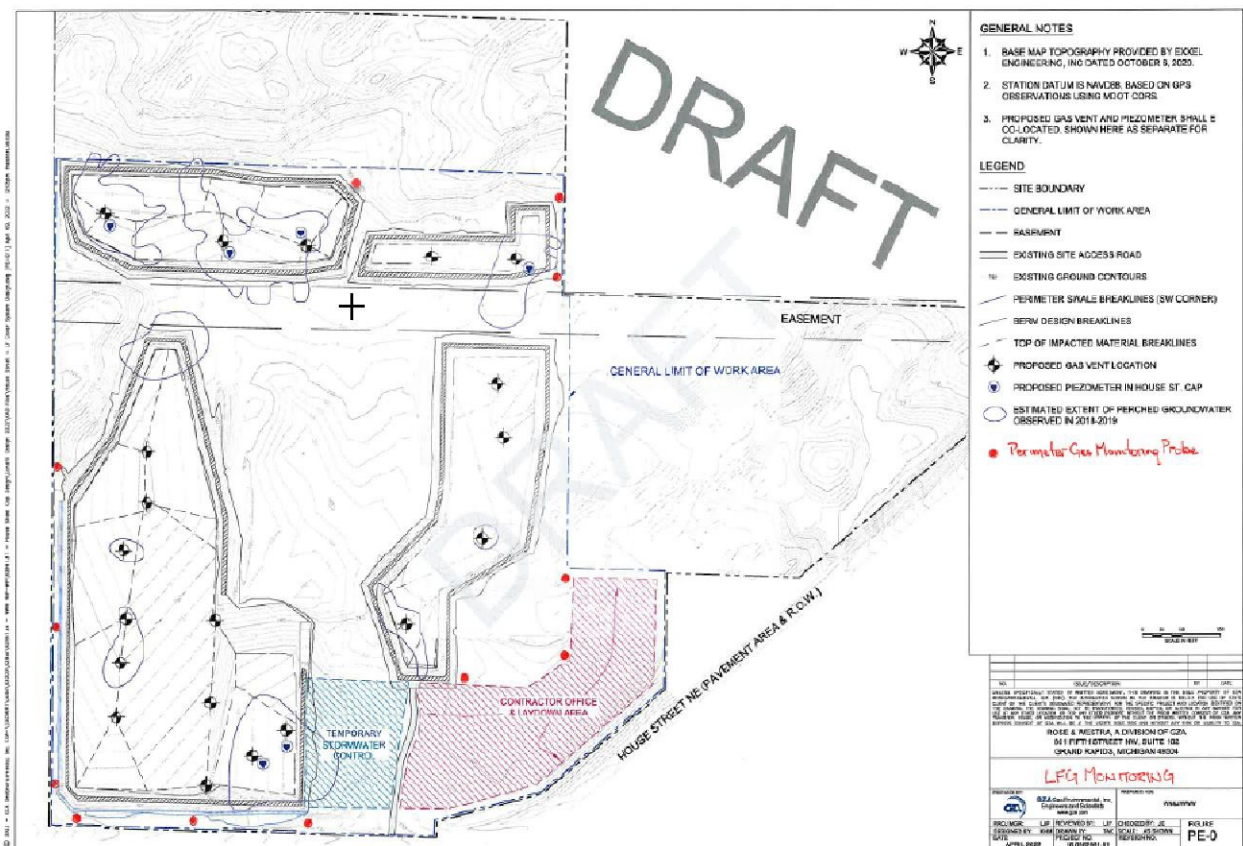
- a. Add clarifying language to the air monitoring discussions that the air monitoring equipment will be similar to that used during the House Street Property and the Former Tannery U.S. Environmental Protection Agency removal actions and will include organic vapor monitoring and dust monitoring at fixed points along the House Street Property boundaries. The boundary air monitors will collect samples for PM<sub>10</sub> to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) for PM<sub>10</sub> of 150 µg/m<sup>3</sup> (24-hour).
- b. It is EGLE's understanding that moveable equipment will be used near the active excavation area to monitor air quality between the work area and the House Street Property boundary. Add this clarification to the text of the Work Plan.
- c. Add clarification to the Work Plan text in this section that dust suppression activities (such as watering) will also occur for the roads and parking areas created on the House Street Property, not just the active soil removal areas, as well as during chipping of the onsite vegetation.
- d. Include a field point of contact from GZA for residents to reach out to regarding air monitoring questions or concerns.

**6. Gas Management Plan & Landfill Gas Migration Monitoring Plan (Appendix B – Page 122 & 123)**

- a. It is understood that the post-construction plan submitted to EGLE for approval after completion of the project will include details of the landfill gas monitoring, which will be part of the long-term operations and maintenance and monitoring of the site. Please make a note in the appropriate sections of the Work Plan that the Landfill gas migration monitoring plan will generally consist of the following:



- i. Monitoring will be conducted on a quarterly basis to confirm that methane gas, if generated, is not more than 100 percent of the lower explosive limit at gas vents and perimeter gas probes; that the concentration of methane gas is not more than the lower explosive limit at House Street Property boundary; and gases, generated, if any, do not create a nuisance odor at the House Street Property Boundary.
- ii. Mitigation steps and remedial measures if methane gas levels exceed the limits specified in the approved LFG monitoring plan and post-closure plan.
- iii. Include a figure that identifies the conceptual locations of perimeter landfill gas monitoring points as shown below (12 red points):



**7. Post-Closure Plan (Appendix B – Page 122)**

- a. Note in the appropriate portions of the Work Plan text that Wolverine will submit a post-construction plan to EGLE for review and approval, and that the post-construction plan will include:
  - i. A description of the monitoring and maintenance activities that are required for the House Street Property, and the frequency at which these activities will be performed. Anticipated activities include mowing of the waste mound caps, monitoring of landfill gas vent / probes, monitoring of the drainage basins, perched water

monitoring, and observations related to erosion or surficial damage on-site that needs repair.

- ii. Name, address, and telephone number of the person or office to contact about the House Street Property during the post-construction period.
- iii. Certification that post-construction use of the House Street Property has not disturbed the integrity of the final cover, or other components of the containment system or the function of the monitoring systems unless necessary to comply with EGLE requirements.

**8. Survey Control Information (Appendix B – Page 122)**

- a. Include a plan showing Control Points and conceptual site access roads in the final Work Plan submittal.

**9. Update C factor in USLE Calculations (Attachment A.6 – Page 197)**

- a. Revise the calculation to use a C factor of 0.01.

**10. Onsite Topsoil Conformance Testing (Attachment A.6 – Page 267)**

- a. Update to include conformance testing for onsite topsoil to specification.

**11. Geomembrane (Section 6.2.3 - Page 270)**

- a. Update text to say, “seams will be oriented parallel to slopes (perpendicular to the contour lines), as often as possible,” not “as practical.”
- b. Update text to say, “after five hours of seaming,” not “continuous seaming.”
- c. Clarify in the text where temperature will be measured.

**12. Specifications (Attachment D)**

- a. Page 311: Update text to say “1 test per machine/welder combo.”
- b. Page 312: Extrusion beads to fusion weld edge are not allowed; Cap strips are required.

**13. Pre- and Post-Construction Drainage Maps**

- a. Please add the following details on the pre- and post-construction maps provided within the engineering design package: subcatchments, ditches, flow directions, contour labels, drainage areas being indicated, flow lengths, and times of concentration.
- b. Include the HydroCAD® information directly on the drainage maps.
- c. Include a discussion within the corresponding portions of the Work Plan text that the distance between the proposed retention basin and House Street was considered during design. Specifically, that the top-of-slope of the retention basin is no closer to House Street than the current onsite



depression and the retention basin will be reconstructed to a flatter slope, with a depth that is consistent with the current depression depth.

**14. Figure PE-003**

- a. Add the coordinate system onto this figure.
- b. The waddle settlement log should be moved to an erosion and sediment control detail sheet.
- c. Note either on the figure or in the corresponding Work Plan text that an erosion and sediment control plan will be provided for submittal to the County.

**15. Figure PE-005**

- a. Revise the hatching to better identify different areas.
- b. Include calculations and a cross-section sketch within the Work Plan to show suitable capacity and drainage / infiltration of the retention basin and the separation between the capped area from retention basin infiltration.

**16. Figures PE-006, 007, 008, 009**

- a. Update legend to only include features shown on each figure and include any missing items/features that were not currently shown in the legend.
- b. Depict the location(s) of temporary and permanent access roads.
- c. Clarify if the contours are proposed or existing conditions.
- d. Update the Work Plan to include a generalized cut and fill drawing associated with these figures which will identify the locations where cut and fill activities will occur within the mound areas to adjust subgrade slopes to promote surface water run-off and maintain slopes between 4% to about 20%.

**17. Figure PE-011**

- a. Include clarification either on the figure or in the appropriate portions of the Work Plan, that based on the anticipated excavation depths and perched groundwater identified during previous investigations, it is not expected that perched water will be encountered during construction activities.
- b. However, if perched groundwater is encountered during construction, it should be noted in the Work Plan that the water will be handled under an approved construction management plan which will require the water be pumped from the excavation into separate holding tanks, sampled and tested, and disposed properly.

**18. Figure PE-012**

- a. Update the figure to include the following details:
  - i. Describe or depict the anticipated water conveyance(s) across the site (e.g., ditches, swales, etc.).
  - ii. Label the mounds.
  - iii. Consider providing a breakdown of the area(s) (e.g., square feet or acres) lined and/or the mounds.
  - iv. Extend the contour lines off the property onto adjoining properties.
  - v. Modify to show the areas that will include a textured linear low-density polyethylene (LLDPE) geomembrane.

**19. Figure PE-014**

- a. Include the anticipated locations of access roads to each mound.

**20. Figures PE-015 through PE-020**

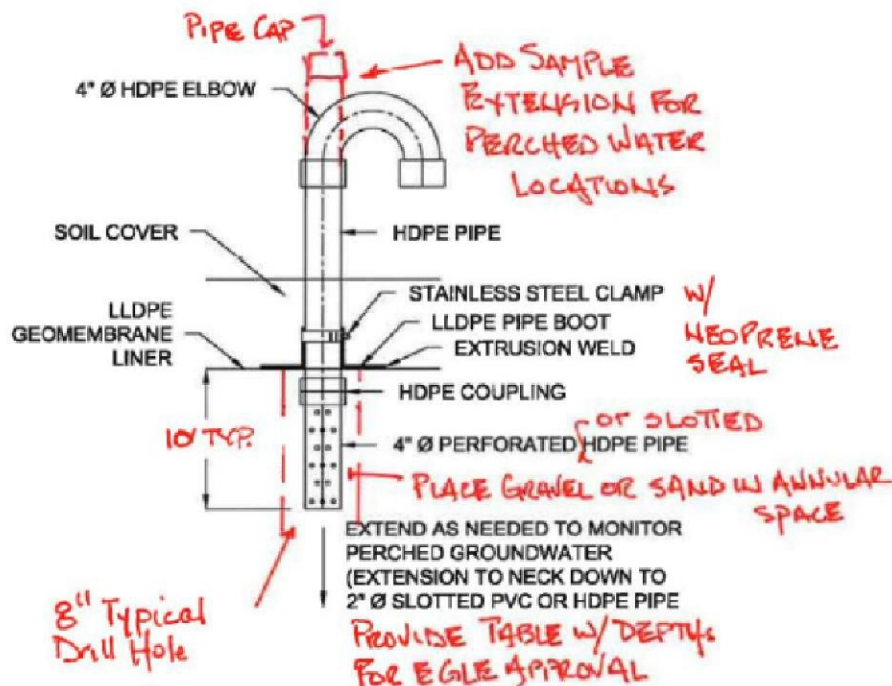
- a. Add clarification either on the figures or in the appropriate sections of the Work Plan text, that containment berms are planned to be removed and incorporated into the landfill mound barrier cover soil after construction. Confirm if the containment berm that separates the southwest mound from the retention basin is the only berm that will remain.
- b. On figure PE-020, add a LLDPE anchor trench detail.

**21. Figure PE-021:**

- a. Please update the Landfill gas vent detail as shown below:

**LANDFILL COVER GAS VENT**

(NOT TO SCALE)



- b. Additionally, in the corresponding part of the Work Plan text, clarify that the LLDPE subgrade and/or material placed as top-of-subgrade will be tested for permeability and the surface will be tracked or rolled but not compacted with vibration. A rough calculation of the necessary standard for the permeability of the gas venting layer should be included. The specifications for this layer should include appropriate permeability testing to ensure that it meets the required/calculated permeability and grain size analysis to ensure it meets the requirements of Rule 918(5)(c).



EGLE's approval is conditioned on Wolverine making the above changes to the Work Plan. If the above changes are not made, EGLE's approval of the Work Plan is withdrawn. The above changes should be made and the final Work Plan provided to EGLE within 45 days of receipt of this letter.

This approval with conditions of the Work Plan is based upon the representations and information contained in the submittal. EGLE expresses no opinion as to whether other conditions that may exist will be adequately addressed by the response activities that are proposed.

If you should have further questions or concerns, you may contact me directly.

Sincerely,

*Karen Vorce*

Karen Vorce  
District Supervisor  
Grand Rapids District Office  
Remediation and Redevelopment Division  
616-439-8008  
Vorcek@michigan.gov

cc: John Byl, Warner Norcross & Judd LLP  
Lori Powers, GZA GeoEnvironmental, Inc.  
Polly Synk, Department of Attorney General  
Danielle Allison-Yokom, Department of Attorney General  
Abigail Hendershott, Michigan PFAS Action Response Team  
Joshua Mosher, EGLE  
Heidi Hollenbach, EGLE  
Timothy Unseld, EGLE  
Ashley Fuller, EGLE  
Nancy Johnson, EGLE  
Leah Gies, EGLE