

Summary of Public Comments
and
Department of Environment, Great Lakes, and Energy (EGLE) Responses
to
Wolverine World Wide, Inc.’s (Wolverine) Proposed Response Activity Plan
for
Residential Well Resampling
Public Comment Period: June 11, 2020 – July 18, 2020

Commenter	Comment	EGLE Response
Sandy Wynn-Stelt (Wolverine Community Advisory Group)	Section 4.0 Proposed Statement of Work: 1. The resampling schedule is for three years. What is the plan past that timeline?	Appendix M of the Consent Decree states: “Next steps regarding residential well sampling, including any proposed cessation of residential well sampling, is subject to approval by EGLE.” EGLE expects that future residential well resampling beyond the first three years after the Consent Decree effective date will be needed to monitor residential well per- and polyfluoroalkyl substance (PFAS) concentrations within “Filter Areas” long-term. This continued long-term residential well monitoring plan would be included in the Completion Report which is required to be submitted per Section 7.12(a)(ii) of the Consent Decree. EGLE will be requiring that Wolverine include this reference within the final Residential Well Resampling Activity Plan.
Sandy Wynn-Stelt (Wolverine Community Advisory Group)	Section 4.0 Proposed Statement of Work: 2. Will the sampling schedule be revised when/if the MCL’s are lowered? a. Suggestion: The new schedule should be available to the CAG for review and comment.	The new maximum contaminant levels (MCLs) for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) become effective on August 3, 2020. On that date, the Michigan Part 201 Cleanup Criteria also changed to the MCL levels for PFOA and PFOS and became what is called an applicable PFAS cleanup criteria. As stated in the Residential Well Resampling Response Activity Plan, any drinking water well that exceeds 10 ppt PFOS + PFOA <u>or</u> an applicable PFAS cleanup criteria (which in this case would be the new criteria PFOA and PFOS) will be sampled annually until that well has

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		<p>been sampled a total of at least three times. The sampling schedule therefore is written in a way that will automatically update to include any future exceedances of an applicable PFAS cleanup criteria.</p>
<p>Sandy Wynn-Stelt (Wolverine Community Advisory Group)</p>	<p>Section 4.0 Proposed Statement of Work:</p> <p>3. There is no mention for how new owners will be provided information about resampling of wells.</p> <ul style="list-style-type: none"> • Suggestion: There have been reports of new homeowners not being aware of water drinking issues relative to PFAS/PFOS. How will new owners be notified of this issue? Realtors and sellers should be required to provide information about these systems prior to purchase of the homes. • Suggestion: EGLE should do split sampling along with R&W/GZA so that sampling and analysis can be compared to each other's SAP. This will need to show consistency and accountability with sampling techniques and well as the sampling analysis testing reports in the designated filter areas throughout the Residential Well Resampling Response Activity Plan. 	<p>EGLE agrees that new homeowners need to be made aware of testing results or any other environmental issues associated with the property. Per Michigan's Seller Disclosure Act, Act 92 of 1993, a seller is required by law to notify any prospective buyer about the property's physical condition, which would include any filtration systems Wolverine installed, and also disclose the PFAS testing results previously completed at the property. In addition, Section 20116 of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, Act 451 of 1994, as amended, requires that a person who has knowledge that their real property is a "facility" shall provide written notice to the purchaser or other person to which the property is transferred disclosing the known general nature and extent of the hazardous substance release and any land or resource use restrictions (i.e., the Plainfield Charter Township or Algoma Township "Groundwater Use" ordinances) that are known by the person to apply.</p> <p>EGLE plans to collect periodic split samples with Wolverine during the work completed under the Response Activity Plans associated with the February 19, 2020 Consent Decree. As outlined in Section 10 (Sampling and Analysis) of the Consent Decree, Wolverine shall provide EGLE with a seven (7) day notice prior to any sampling activity to allow EGLE the opportunity to take split or duplicate samples for quality assurance and quality control or to observe the sampling procedures.</p>
<p>Sandy Wynn-Stelt (Wolverine Community Advisory Group)</p>	<p>Section 4.0 Proposed Statement of Work:</p> <p>4. Question: For those who may be keeping their well active for outdoor purposes and are getting municipal water connections, will sampling take place with those residents? This would help determine possible plume</p>	<p>Note that the Residential Well Resampling Response Activity Plan applies to properties located in "Filter Areas" of the North Kent Study Area as defined in the February 19, 2020 Consent Decree. Additional groundwater monitoring around the edges or perimeter of the "Municipal Water Areas", and within the "Filter Areas" is also required under the Consent Decree.</p>

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	<p>movements throughout the filtered residential parcels during the 3-year sampling plan.</p>	<p>If properties located within a “Municipal Water Area” apply for and are granted a well exception from Plainfield Township under the Township’s Groundwater Use Ordinance, future sampling of the well for PFAS is a likely requirement for continued operation of the well.</p>
<p>Sandy Wynn-Stelt (Wolverine Community Advisory Group)</p>	<p>Section 8.0 Anticipated Schedule</p> <ol style="list-style-type: none"> 1. Upon completion of the three years of residential well sampling outlined in this RAP, R&W/GZA will review the data in consultation with EGLE. Wolverine will submit a completion report summarizing the results of the sampling <ul style="list-style-type: none"> • Suggestion: It is recommended that this report be provided to the Wolverine CAG. 	<p>All Completion Reports submitted to EGLE as required under the Consent Decree will be posted for the public to view on EGLE’s website (www.michigan.gov/belmont). EGLE can provide a link to where the report will be posted to the Wolverine CAG.</p>
<p>Tom Sapkowski (Wolverine Community Advisory Group)</p>	<p>Comment about the residential well retesting plan: commenter wanted to see neighborhood in area of Van Dam east of Belmont to Packer included in well resampling plan. Writer had their well tested 2.5 years ago which was non-detect and paid for another test out of pocket. Writer’s property is slated to get municipal water in 2021 and noted plans to keep using well for irrigation and swimming pool.</p> <p>Writer noted recent letter from Rick Ridiske (sic) as also part of comments.</p>	<p>The Residential Well Resampling Response Activity Plan (ResAP) is aimed at gathering information about wells located within “Filter Areas” which are <u>not</u> receiving municipal water under the Consent Decree. The locations you noted are scheduled to receive municipal water and are addressed differently under the Consent Decree. The locations included within this ResAP and scheduled for resampling were publicly noticed in Appendix M of the Consent Decree during the February 2020 public comment period and are therefore not subject to change based on this public comment period. Therefore, EGLE cannot request properties outside of “Filter Areas”, located in Municipal Water Areas be added to the scope of work.</p> <p>The Michigan Attorney General held a Townhall Meeting on February 10, 2020 which went over the contents of the Consent Decree and an Assistant Attorney General also attended the February 13, 2020 Wolverine CAG meeting to go over any concerns or questions the Wolverine CAG had regarding the Consent Decree.</p> <p>The Attorney General’s responsiveness summary to the comments received during the February 2020 public comment</p>

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		<p>period is posted on the Michigan Attorney General's PFAS website: https://www.michigan.gov/ag/0,4534,7-359-82917_97454---,00.html.</p> <p>A request to continue using a well in areas receiving municipal water will be considered by Plainfield Township. Continued use of wells in the municipal water areas is governed by the Townships' Groundwater Use Ordinance, and continued use can only be allowed if a user is granted a well exception from Plainfield Township under the Township's Groundwater Use Ordinance.</p> <p>If you have specific questions about your well in relation to PFAS groundwater contamination and EGLE's conceptual site model, EGLE district staff would be happy to discuss those with you.</p>