

**Summary of Public Comments
and
Department of Environment, Great Lakes, and Energy (EGLE) Responses
to
Wolverine World Wide, Inc.'s (Wolverine) Proposed Response Activity Plans
for
Groundwater Investigation in Area 5, Area 6, Area 11 &12, and Area 19
Public Comment Period: August 6, 2020 – September 10, 2020**

Commenter	Comment	EGLE Response
Richard R. Rediske (The Wolverine Community Advisory Group)	We have reviewed the Draft Response Activity Plans for groundwater investigations at Areas 5, 6, 11/12 and 19 by GZA/Wolverine and are concerned about the representation of the plumes on the maps being disconnected from the source at the House Street Disposal Site (HSDS) and Wolven Jewel Disposal Site (WJDS).	EGLE appreciates your analysis of GZA's isoconcentration figures which were submitted as part of Wolverine's Draft Area 5, 6, 11 & 12, and 19 Response Activity Plans. EGLE agrees with your concerns and comments on the isoconcentration map interpretations/depictions being discontinuous which will be reflected in EGLE's review and response to these Response Activity Plans.
Richard R. Rediske (The Wolverine Community Advisory Group)	The CAG is concerned about the GZA/Wolverine implication that plumes, especially on the opposite sides of rivers adjacent to plumes, are unrelated to Wolverine contamination. More specifically, the statement that "septic systems, rain deposition, and the use of domestic products that contain PFAS (Schaidler et al, 2016; EGLE, 2019a; ITRC, 2020)" may be responsible for the area groundwater pollution on page 2 of each RAP. While Schaidler et al. (2016) found PFAS compounds in a small sample of 20 shallow wells in Cape Cod, the highest concentration reported was 7 ng/l and a variety of other contaminants such as nitrate, boron, pharmaceuticals/personal care products cooccurred. ITRC (2020) discusses	Thank you for your insight into this specific paragraph in the Response Activity Plans and your review of the three references (Schaidler et al, 2016; EGLE, 2019a; ITRC, 2020). EGLE will take this into consideration when commenting back to Wolverine. Under the Consent Decree, Wolverine is obligated to define the vertical and horizontal extent of PFAS compounds in groundwater within Areas 5, 6, 11 & 12, and 19.

Commenter	Comment	EGLE Response
	rain deposition which would be uniform across a broad area and not produce the plumes represented by GZA/Wolverine. The EGLE (2019a) reference also does not apply to this situation because the Robinson Township plume is in shallow groundwater and related to Fire Department usage.	
Richard R. Rediske (The Wolverine Community Advisory Group)	The maps presented in the RAPs give the reader the impression that separate, smaller/contained contamination areas exist rather than continuous plumes from the source areas. While there may be minor contributions from other sources in investigation areas, we feel these statements are misleading, as groundwater data support that the disposal of industrial waste by Wolverine at the HSDS and WJDS is primarily responsible for contamination of the aquifers in the Response Activity Plan areas. In the absence of exculpatory data clearly indicating other sources, GZA/Wolverine should either remove these statements, or <i>supplement</i> them to indicate that Wolverine <i>could</i> also be the source and that the true source can be determined only after further investigation. If Wolverine desires to avoid a potential admission of liability in areas of uncertain contamination sources, it could explicitly state that it is “investigating pursuant to the Consent Decree without any admission of liability” rather than creating the impression that non-Wolverine sources are the underlying cause of the contamination in these areas. The data simply do not support such an implication.	EGLE shares your concerns regarding the isoconcentration map interpretations/depictions and statements in the report regarding PFAS sources. These concerns will be reflected in EGLE’s review and response to these Response Activity Plans. Under the Consent Decree, Wolverine is obligated to define the vertical and horizontal extent of PFAS compounds in groundwater within Areas 5, 6, 11 & 12, and 19.

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<p>Richard R. Rediske (The Wolverine Community Advisory Group)</p>	<p>We are especially concerned about areas 11 and 12 as GZA/Wolverine is stating that the HSDS plume does not pass beneath the Rogue River near Area 12 (page 7, paragraph 1). The Plainfield Township water supply wells are located on the opposite side of the Grand River from Area 11 and contain low levels of PFAS. We feel that the Response Activity Plan for Area 11 and 12 should specifically address the possibility that the Wolverine plume is migrating under the Rogue River and, if so, whether it has an influence on the Plainfield Water Supply Wells.</p> <p>The Wolverine Community Advisory Group appreciates the opportunity to comment on these important workplan. We understand that groundwater investigations are conducted in phases and request that future phases may be needed to address how the PFAS plumes interact with the Rogue River near Area12 and if the plume in Area 11 is fully intercepted by the Grand River.</p>	<p>Wolverine’s obligations are to define the horizontal and vertical extent of PFAS groundwater contamination within Areas 11 & 12. As the groundwater investigations continue over time, the data collected will indicate whether PFAS groundwater contamination identified within Areas 11 & 12 can be attributed to groundwater contamination migrating beneath the Rogue River.</p> <p>The Plainfield Water Supply Wells are located outside the North Kent Study Area, which is the geographic area covered by the associated Response Activity Plans of the Consent Decree. Therefore, any investigation work conducted in areas outside the North Kent Study Area would be done under a separate work plan outside the Consent Decree.</p> <p>Additionally, it should be noted that in Section 6.0 (Municipal Water and Institutional Controls) of the Consent Decree, Wolverine is required to pay Plainfield Township (up to a cap of 7.5 million) for the costs associated with the construction of a permanent granulated activated carbon (“GAC”) filtration system at Plainfield Townships water treatment plant, the development and implementation of a replacement wellfield for the Versluis wellfield, and expansion of water treatment plant capacity.</p>