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A Division of GZA

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June 18, 2018
File No. 16.0062335.02

Ms. Abigail Hendershott
Acting District Supervisor – Remediation and Redevelopment Division
Michigan Department of Environmental Quality
350 Ottawa Avenue NW #10
Grand Rapids, MI 49503

Re: Source Investigation Tasks Summary (SITS)
Former Tannery Site
123 Main Street, Rockford, Kent County, Michigan

Dear Ms. Hendershott:

On behalf of Wolverine World Wide, Inc. (Wolverine), Rose & Westra, a Division of GZA GeoEnvironmental, Inc. (R&W/GZA), prepared this Source Investigation Tasks Summary (SITS) related to per- and poly-fluoroalkyl substances (PFAS) at the Former Tannery Site (Site). The SITS and attached documents were prepared in response to certain requests included in MDEQ's May 31, 2018 letter¹ to Wolverine and Wolverine's ongoing investigation.

As requested, the proposed SITS is focused on evaluating the vertical and lateral extent of perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA). The proposed investigation is based on the US EPA Extent of Contamination Study Removal Work Plan dated June 18, 2018 (RWP), a copy of which is enclosed, our experience at the Site, and experience at other PFAS-related sites.

The following generally summarizes the sections of the RWP that address the sampling strategy at the Site.

RWP SECTION 3.2.4.1: AOC SOIL SAMPLING

This subtask includes collecting soil samples from AOCs B through H as depicted on Figure 4B of the RWP; the former maintenance area (excavated during 2010); S-1 soil sampling area; near the former Primary Clarifier; and along the White Pine Trail. Fifty-one soil sampling locations associated with AOC sampling are proposed which are depicted on Figure 4B of the RWP. Final soil sample locations will be selected in the field based on access. AOC A will be addressed by installation of a groundwater monitoring well (Section 3.2.5 of RWP) due to access limitations.

¹ Letter by MDEQ titled "Tannery-Wolverine World Wide, Inc. (Wolverine) Per- and Polyfluoroalkyl Substances (PFAS) Response to "Draft Removal Work Plan for the Tannery, Rockford, Kent County, Michigan: Approval with Modifications dated April 24, 2018," hereafter renamed "Extent of Contamination Study Removal Work Plan, Former Wolverine Tannery, Rockford, Michigan."



At least two samples will be collected from each of the boring locations for laboratory analysis. Additional soil samples from these borings may be collected at the discretion of R&W/GZA or under the direction of agency supervising personnel in the field.

An aliquot of the above-described samples will also be collected at each discrete location for PFAS analysis in accordance with the methods described in the DEQ PFAS QAPP.

It is projected 51 soil samples will be collected based on this sampling scheme.

RWP SECTION 3.2.4.2: GRID-BASED SOIL SAMPLING

Soil samples will be collected at locations selected within an equilateral triangular grid superimposed on the site. The maximum length of the side of a triangle within the grid will be 194 feet. Within the central portion of the Site, the length of the sides of the triangle will be decreased to 97 feet reflective of the historical Site use depicted in Appendix B of the RWP. The proposed grid was developed using VSP7². Assuming a circular hot spot with a radius of 50 feet and the proposed triangular grid spacing within the central portion of the Site (i.e., 97 feet), VSP7 calculates a 95 percent probability of finding the hot spot.

Soil samples will be collected at the grid nodes, except for locations where previous soil samples have been collected within approximately 25 feet of the grid node. R&W/GZA proposes to collect 51 supplemental soil samples based on the grid-based sampling approaches as shown on Figure 4B of the RWP. Each borehole will be advanced until the XRF readings, PID readings and visual inspection indicate no contamination, to a maximum depth of 20 feet below grade, or to the water table. Additional soil samples may be collected at the discretion of R&W/GZA or under the direction of agency supervising personnel in the field.

An aliquot of the above-described samples will also be collected at each discrete location for PFAS analysis in accordance with the methods described in the QAPP.

It is projected 51 soil samples will be collected based on this sampling scheme.

RWP SECTION 3.2.5: MONITORING WELL INSTALLATION

Groundwater monitoring wells will be constructed within the upper sandy deposits at locations identified in Section 3.2.4 of the RWP. R&W/GZA anticipates installation of up to approximately 10 additional monitoring wells. The primary objective of the monitoring well installation program will be to provide sampling locations to further evaluate groundwater surface water interactions including COC transport. Monitoring well installation will include:

- A minimum of five monitoring wells installed along the downgradient Site boundary (i.e., the Rogue River);
- One groundwater monitoring well installed downgradient of the location of a former heating oil tank shown within the outlet store (AOC A, Figure 4A of RWP). Based on the proximity of this AOC relative to the existing retail outlet building (i.e., location within the courtyard and potentially beneath the building), soil sampling is not proposed;

² Visual Sampling Plan 7 (version 7.10), © Battelle Memorial Institute, released December 22, 2017.



- One groundwater monitoring well installed downgradient of the S-1 soil sampling area to evaluate potential presence of TCE in groundwater and potential for migration to indoor air (Figure 4A of RWP). Evaluation of TCE concentration in groundwater is proposed based on the detection of TCE in soil samples collected in the S-1 soil sampling area;
- One groundwater monitoring well installed in the location of the former piping runs where process piping was located, to evaluate the potential for historical releases from the piping runs; and,
- Additional wells may be installed, if necessary to meet the objectives of the Extent of Contamination Study, at locations to be selected in the field and coordinated with MDEQ and EPA.

RWP SECTION 3.2.6: GROUNDWATER QUALITY SAMPLING

Two rounds of groundwater sampling events will be performed to evaluate the potential presence of COCs in groundwater. Both rounds of groundwater samples will include both the existing monitoring wells and the newly installed monitoring wells to provide data needed to evaluate water quality trends, and for comparison to the data for samples collected from the newly installed wells.

An aliquot of the above-described groundwater samples will also be collected at each monitoring well for PFAS analysis in accordance with the methods described in the QAPP.

It is projected that 57 groundwater samples will be collected during each round of sampling based on this sampling scheme.

RWP SECTION 3.2.7: SURFACE WATER SAMPLING

Two rounds of surface water samples will be collected from the seven locations illustrated on Figure 4A of the RWP. Collection of the second round of surface water samples will be performed a minimum of one month after the first round. Surface water samples will be collected during periods of normal to low flow as observed during normal summer conditions. The locations were selected to provide data to evaluate site and background contributions to the concentrations of Site-related COCs. Surface water sampling will include locations up- and downstream of the Site on the Rogue River; up- and downstream ends of Rum Creek; up- and downstream of the confluence of the Rogue River and Rum Creek, and at a point within the area downstream of the former waste water treatment facility.

The surface water sampling task will also include observation of the eastern shoreline of the Rogue River from the Rogue River to identify outfalls to the Rogue River. Observations will be made along the Site boundary with the Rogue River. Water quality samples will be collected from outfalls if the source of the water may be related to the Site (i.e., municipal storm drains will not be sampled).

An aliquot of the above-described surface water samples will also be collected at each location for PFAS analysis in accordance with the methods described in the QAPP.

It is projected that 7 surface water samples will be collected based on this sampling scheme.

RWP SECTION 3.2.9: SEDIMENT SAMPLING

Samples of sediment will be collected within the Rogue River and Rum Creek to supplement historical sampling along riverbanks and provide background sediment quality data. Samples will be collected by R&W/GZA personnel or our



subcontractor within depositional environments in the stream channels. Preliminarily proposed sampling locations are illustrated on Figure 4C of the RWP, including 10 transects of the Rogue River, apparent eddy area on east side of the Rockford Dam, and well-used access points along the edge of the Rogue River. Each of the transects will include a minimum of three sampling locations (*i.e.*, a minimum of 30 sediment sampling locations).

Sediment samples will also be collected from Rum Creek at locations upstream of the eastern Site boundary and on Site, upstream of the confluence with the Rogue River. The preliminary locations depicted on Figure 4C of the RWP may be modified following the mapping of depositional environments; however, a minimum of 10 transects will be completed in the Rogue River including one transect located downstream of the Rockford Dam.

R&W/GZA field personnel will continuously screen soil samples in the field for COCs including visual methods.

An aliquot of the above-described sediment samples will also be collected at each location for PFAS analysis in accordance with the methods described in the QAPP.

It is projected that 65 sediment samples will be collected based on this sampling scheme.

RWP SECTION 3.2.10: VAPOR INTRUSION STUDY

Based on the low volatility of PFAS, no soil gas sampling is proposed to investigate the potential vapor intrusion pathway at the Site and adjoining residential properties.

ADDITIONAL SUPPORTING DOCUMENTATION

At your request, R&W/GZA has included the following additional supporting documentation as it pertains to the PFAS data available for the Site.

- Table 1: Summary of Surface Water Analytical Data - PFAS
- Table 2: Summary of Pore Water Analytical Data – PFAS
- Table 3: Summary of Groundwater Analytical Data – PFAS
- Table 4: Summary of Soil and Scrap Sample Analytical Data – PFAS
- Table 5: Summary of Leather Scraps Leachage - PFAS
- Figure 1: Total PFAS Groundwater Sampling Data
- Figure 2: Average PFAS Concentration – Shallow Groundwater
- Figure 2B: Average PFOS Concentration -Shallow Groundwater
- Figure 3: Site Plan with Cross Section Cuts
- Figure 4: Cross Sections



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SCHEDULE

This SITS will be implemented in conjunction with the EPA RWP. The projected schedule is included in RWP Appendix B. Generally, the work will commence on June 18, 2018 with the first phase taking approximately 10 weeks to complete.

R&W/GZA trust that this letter and attachments are responsive to MDEQ requests referenced herein. Should you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

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

Mark A. Westra
Associate Principal

Leslie M. Nelson
Senior Project Manager

Enclosures: EPA RWP, Dated June 18, 2018
 Previously Listed Tables and Figures

TABLE 1
SUMMARY OF SURFACE WATER ANALYTICAL DATA - PFAS
FORMER TANNERY SITE
ROCKFORD, MICHIGAN

LOCATION	MDEQ Rule 57 Human Health Non-Drink Value	SW01RC	SW01RR	SW-18-100	SW-18-101	SW-18-102	SW-18-103A	SW-18-103B	SW-18-104	SW-18-105	SW-RC-106	SW-RC-107	SW-RC-108
SAMPLE NAME		SW01RC	SW01RR	SW-18-100	SW-18-101	SW-18-102	SW-18-103A	SW-18-103B	SW-18-104	SW-18-105	SW-RC-106	SW-RC-107	SW-RC-108
LAB ID		K1713966-004	K1713966-005	K1802384-002	K1802384-003	K1802384-007	K1802384-008	K1802384-009	K1802384-010	K1802384-001	K1802384-006	K1802384-005	K1802384-004
SAMPLE DATE		12/28/2017	12/28/2017	03/13/2018	03/13/2018	03/13/2018	03/13/2018	03/13/2018	03/13/2018	03/13/2018	03/13/2018	03/13/2018	03/13/2018
Parameter (ng/L)													
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
N-Ethyl perfluorooctane sulfonamide (EtFOSA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
N-Ethyl perfluorooctane sulfonamidoethanol	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
N-Methyl perfluorooctane sulfonamide (MeFOSA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
N-Methyl perfluorooctane sulfonamidoethanol	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorobutane sulfonic acid (PFBS)	NA	4.5	4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorobutanoic acid (PFBA)	NA	<8.6	<8.6	<8.9	<8.9	<8.9	<8.9	<8.9	<8.9	<8.9	<8.9	<8.9	<8.9
Perfluorodecane sulfonic acid (PFDS)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorodecanoic acid (PFDA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorododecanoic acid (PFDoDA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluoroheptane sulfonic acid (PFHpS)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluoroheptanoic acid (PFHpA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorohexane sulfonic acid (PFHxS)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorohexanoic acid (PFHxA)	NA	<4.3	<4.3	<4.5	540	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	580
Perfluorononanoic acid (PFNA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorooctane sulfonamide (FOSA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorooctane sulfonic acid (PFOS)	12	15	7.1	<4.5	<4.5	6.3	12	9.8	13	<4.5	15	12	<4.5
Perfluorooctanoic acid (PFOA)	12,000	4.8	3	<1.8	1.9	2.7	5	4	5.8	<1.8	5.3	4.9	2.2
Perfluoropentanoic acid (PFPeA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorotetradecanoic acid (PFTeDA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluorotridecanoic acid (PTrDA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5
Perfluoroundecanoic acid (PFUnDA)	NA	<4.3	<4.3	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5	<4.5

NOTES:

1. Concentration and criteria units are nano-grams per liter (ng/L) or parts per trillion (ppt); "< RL" indicates the compound was analyzed for but not detected above the method detection limit; RL = Reporting Limit

2. Bold indicates that compound was detected above the RL. Italic number with thick line border or italic chemical indicates that compound was detected above the USEPA Health Advisory for Drinking Water Uses.

3. Rule 57 Human Health Non-Drinking Values, dated March 15, 2018, were downloaded from the Michigan Department of Environmental Quality web site (https://www.michigan.gov/deq/0,4561,7-135-3313_3681_3686_3728-11383--00.html)

4. The cleanup criteria of 70 ppt was established for the combined concentrations of PFOA and PFOS.

TABLE 1
SUMMARY OF SURFACE WATER ANALYTICAL DATA - PFAS
FORMER TANNERY SITE
ROCKFORD, MICHIGAN

LOCATION	MDEQ Rule 57 Human Health Non-Drink Value	TN-GR-17-A1	TN-GR-17-A2	TN-GR-17-A3	TN-GR-17-B1	TN-GR-17-B2	TN-GR-17-B3	TN-GR-17-C1	TN-GR-17-C2	TN-GR-17-C3	TN-GR-17-C4	TN-SW-17-10	TN-SW-17-10	TN-SW-17-100	TN-SW-17-101
SAMPLE NAME		GR-17-A1	GR-17-A2	GR-17-A3	GR-17-B1	GR-17-B2	GR-17-B3	GR-17-C1	GR-17-C2	GR-17-C3	GR-17-C4	SW-17-10	SW-17-10 (DUP)	SW-17-100	SW-17-101
LAB ID	K1712506-001	K1712506-002	K1712506-003	K1712506-004	K1712506-005	K1712506-006	K1712506-007	K1712506-008	K1712506-009	K1712506-010	K1709951-011	K1709951-006	K1711313-001	K1711313-002	
SAMPLE DATE	11/16/2017	11/16/2017	11/16/2017	11/16/2017	11/16/2017	11/16/2017	11/16/2017	11/16/2017	11/16/2017	11/16/2017	11/16/2017	09/15/2017	09/15/2017	10/17/2017	10/17/2017
Parameter (ng/L)															
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	38	37	34	37	38	37	41	37	38	25	<4.3	<4.2	<4.1	<4.1
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
N-Ethyl perfluoroctane sulfonamide (EtFOSA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
N-Ethyl perfluoroctane sulfonamidoethanol	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
N-Methyl perfluoroctane sulfonamide (MeFOSA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
N-Methyl perfluoroctane sulfonamidoethanol	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorobutane sulfonic acid (PFBS)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	4.8	<4.1	<4.1
Perfluorobutanoic acid (PFBA)	NA	<8.7	<8.6	<8.8	<8.2	<8.5	<8.2	<8.5	<8.2	<8.2	<8.2	<8.6	<8.3	<8.1	<8.1
Perfluorodecane sulfonic acid (PFDS)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorodecanoic acid (PFDA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorododecanoic acid (PFDoDA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluoroheptane sulfonic acid (PFHpS)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluoroheptanoic acid (PFHpA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorohexane sulfonic acid (PFHxS)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorohexanoic acid (PFHxA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorononanoic acid (PFNA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorooctane sulfonamide (FOSA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorooctane sulfonic acid (PFOS)	12	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	7.7	13	12	4.3	4.8
Perfluorooctanoic acid (PFOA)	12,000	<1.7	<1.7	<1.8	<1.6	<1.7	<1.6	<1.7	<1.6	<1.6	3.7	6.3	6.6	1.9	1.9
Perfluoropentanoic acid (PFPeA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorotetradecanoic acid (PFTeDA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluorotridecanoic acid (PFTrDA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1
Perfluoroundecanoic acid (PFUnDA)	NA	<4.3	<4.3	<4.4	<4.1	<4.2	<4.1	<4.2	<4.1	<4.1	<4.1	<4.3	<4.2	<4.1	<4.1

TABLE 1
 SUMMARY OF SURFACE WATER ANALYTICAL DATA - PFAS
 FORMER TANNERY SITE
 ROCKFORD, MICHIGAN

LOCATION	MDEQ Rule 57 Human Health Non-Drink Value	TN-SW-17-102A	TN-SW-17-102B	TN-SW-17-103A	TN-SW-17-103B	TN-SW-17-104A	TN-SW-17-104B	TN-SW-17-4	TN-SW-17-4
SAMPLE NAME		SW-17-102A	SW-17-102B	SW-17-103A	SW-17-103B	SW-17-104A	SW-17-104B	SW-17-4	SW-17-4 (DUP)
LAB ID		K1711313-003	K1711313-004	K1711313-005	K1711313-006	K1711313-007	K1711313-008	K1709828-005	K1709828-003
SAMPLE DATE	10/17/2017	10/17/2017	10/17/2017	10/17/2017	10/17/2017	10/17/2017	10/17/2017	09/13/2017	09/13/2017
Parameter (ng/L)									
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
N-Ethyl perfluorooctane sulfonamide (EtFOSA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
N-Ethyl perfluorooctane sulfonamidoethanol	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
N-Methyl perfluorooctane sulfonamide (MeFOSA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
N-Methyl perfluorooctane sulfonamidoethanol	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorobutane sulfonic acid (PFBS)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorobutanoic acid (PFBA)	NA	<8.1	<8.1	<8.1	<8.1	<8.1	<8.1	<8.3	<8.3
Perfluorodecane sulfonic acid (PFDS)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorodecanoic acid (PFDA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorododecanoic acid (PFDoDA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluoroheptane sulfonic acid (PFHpS)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluoroheptanoic acid (PFHpA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorohexane sulfonic acid (PFHxS)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorohexanoic acid (PFHxA)	NA	<4.1	<4.1	13	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorononanoic acid (PFNA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorooctane sulfonamide (FOSA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorooctane sulfonic acid (PFOS)	12	6.3	6.7	10	9.6	12	11	7.6	7.4
Perfluorooctanoic acid (PFOA)	12,000	3.1	3	5.1	4.8	4.8	5.2	4.4	4.5
Perfluoropentanoic acid (PFPeA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorotetradecanoic acid (PFTeDA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluorotridecanoic acid (PFTrDA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2
Perfluoroundecanoic acid (PFUnDA)	NA	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.2	<4.2

TABLE 2
SUMMARY OF PORE WATER ANALYTICAL DATA - PFAS
FORMER TANNERY SITE
ROCKFORD, MICHIGAN

LOCATION	MDEQ Rule 57 Final Acute Values	MDEQ Rule 57 Final Chronic Values	TN-PW-17-11	TN-PW-17-12	TN-PW-17-1A	TN-PW-17-1B	TN-PW-17-5A	TN-PW-17-5A	TN-PW-17-5B	TN-PW-17-6A	TN-PW-17-6A	TN-PW-17-6B
SAMPLE NAME			PW-17-11	PW-17-12	PW-17-1A	PW-17-1B	PW-17-5A	PW-17-5A (DUP)	PW-17-5B	PW-17-6A	TN-PW-17-6A (DUP)	PW-17-6B
LAB ID			K1709951-012	K1709951-013	K1709828-001	K1709828-002	K1709828-007	K1709828-004	K1709828-006	K1709828-011	K1709828-013	K1709828-012
SAMPLE DATE	09/15/2017	09/15/2017	09/12/2017	09/12/2017	09/13/2017	09/13/2017	09/13/2017	09/13/2017	09/13/2017	09/14/2017	09/14/2017	09/14/2017
Parameter (ng/L)												
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	NA	6.6	<4.3	<4.4	<4.3	<4.3	<4.3	9.3	<4.2	<4.4	<4.3
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
N-Ethyl perfluoroctane sulfonamide (EtFOSA)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
N-Ethyl perfluoroctane sulfonamidoethanol	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
N-Methyl perfluoroctane sulfonamide (MeFOSA)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
N-Methyl perfluoroctane sulfonamidoethanol	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
Perfluorobutane sulfonic acid (PFBS)	NA	NA	1100	<4.3	<4.4	<4.3	12	11	15	15	13	110
Perfluorobutanoic acid (PFBA)	NA	NA	460	<8.6	<8.8	<8.6	13	13	17	<8.3	<8.8	11
Perfluorodecane sulfonic acid (PFDS)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
Perfluorodecanoic acid (PFDA)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
Perfluorododecanoic acid (PFDoDA)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
Perfluoroheptane sulfonic acid (PFHpS)	NA	NA	410	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	18
Perfluoroheptanoic acid (PFHpA)	NA	NA	1000	<4.3	<4.4	<4.3	24	22	26	<4.2	5	27
Perfluorohexane sulfonic acid (PFHxS)	NA	NA	3800	<4.3	<4.4	<4.3	7.4	8.9	<4.3	10	7.9	57
Perfluorohexanoic acid (PFHxA)	NA	NA	2400	<4.3	<4.4	<4.3	94	81	92	4.9	<4.4	33
Perfluorononanoic acid (PFNA)	NA	NA	120	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	5.5
Perfluorooctane sulfonamide (FOSA)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	4.7
Perfluorooctane sulfonic acid (PFOS)	1,600,000	140,000	730	20	<4.4	<4.3	<4.3	<4.3	<4.3	57	60	170
Perfluorooctanoic acid (PFOA)	15,000,000	880,000	3000	9.5	<1.8	<1.7	37	32	24	26	26	170
Perfluoropentanoic acid (PFPeA)	NA	NA	570	<4.3	<4.4	<4.3	24	22	32	<4.2	<4.4	7.1
Perfluorotetradecanoic acid (PFTeDA)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
Perfluorotridecanoic acid (PFTrDA)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3
Perfluoroundecanoic acid (PFUnDA)	NA	NA	<4.3	<4.3	<4.4	<4.3	<4.3	<4.3	<4.3	<4.2	<4.4	<4.3

NOTES:

- Concentration and criteria units are nano-grams per liter (ng/L) or parts per trillion (ppt); "**< RL**" indicates the compound was analyzed for but not detected above the method detection limit; RL = Reporting Limit
- Bold indicates that compound was detected above the RL. Italic number with thick line border or italic chemical indicates that compound was detected above the USEPA Health Advisory for Drinking Water Uses.
- Rule 57 Water Quality Values, dated March 15, 2018, were downloaded from the Michigan Department of Environmental Quality web site (https://www.michigan.gov/deq/0,4561,7-135-3313_3681_3686_3728-11383--,00.html)
- The cleanup criteria of 70 ppt was established for the combined concentrations of PFOA and PFOS.

TABLE 2
 SUMMARY OF PORE WATER ANALYTICAL DATA - PFAS
 FORMER TANNERY SITE
 ROCKFORD, MICHIGAN

LOCATION	MDEQ Rule 57 Final Acute Values	MDEQ Rule 57 Final Chronic Values	TN-PW-17-7A	TN-PW-17-7B	TN-PW-17-8A	TN-PW-17-8B	TN-PW-17-8C	TN-PW-17-9A	TN-PW-17-9A	TN-PW-17-9B
SAMPLE NAME			PW-17-7A	PW-17-7B	PW-17-8A	PW-17-8B	PW-17-8C	PW-17-9A	TN-PW-17-9A (DUP)	PW-17-9B
LAB ID			K1709828-014	K1709828-015	K1709951-001	K1709951-002	K1709951-003	K1709951-007	K1709951-005	K1709951-009
SAMPLE DATE			09/14/2017	09/14/2017	09/14/2017	09/14/2017	09/14/2017	09/15/2017	09/15/2017	09/15/2017
Parameter (ng/L)										
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	37	30	<12
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
N-Ethyl perfluorooctane sulfonamide (EtFOSA)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
N-Ethyl perfluorooctane sulfonamidoethanol	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
N-Methyl perfluorooctane sulfonamide (MeFOSA)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
N-Methyl perfluorooctane sulfonamidoethanol	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
Perfluorobutane sulfonic acid (PFBS)	NA	NA	<4.3	<4.3	12	210	13	2400	2500	1200
Perfluorobutanoic acid (PFBA)	NA	NA	<8.6	<8.6	<8.8	94	<8.6	950	970	470
Perfluorodecane sulfonic acid (PFDS)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
Perfluorodecanoic acid (PFDA)	NA	NA	<4.3	<4.3	<4.4	18	<4.3	60	55	55
Perfluorododecanoic acid (PFDoDA)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
Perfluoroheptane sulfonic acid (PFHpS)	NA	NA	<4.3	<4.3	<4.4	160	<4.3	220	160	150
Perfluoroheptanoic acid (PFHpA)	NA	NA	<4.3	<4.3	8.5	150	9.4	1500	1400	760
Perfluorohexane sulfonic acid (PFHxS)	NA	NA	<4.3	<4.3	16	310	10	920	910	620
Perfluorohexanoic acid (PFHxA)	NA	NA	<4.3	<4.3	26	300	32	4100	4100	1700
Perfluorononanoic acid (PFNA)	NA	NA	<4.3	<4.3	<4.4	51	<4.3	170	150	120
Perfluorooctane sulfonamide (FOSA)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	110	110	100
Perfluorooctane sulfonic acid (PFOS)	1,600,000	140,000	31	42	5.2	7100	9.1	7100	9500	7300
Perfluorooctanoic acid (PFOA)	15,000,000	880,000	4	5.1	23	590	13	5300	6000	3000
Perfluoropentanoic acid (PFPeA)	NA	NA	<4.3	<4.3	6.4	98	7	900	920	360
Perfluorotetradecanoic acid (PFTeDA)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
Perfluorotridecanoic acid (PFTrDA)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	<12	<12	<12
Perfluoroundecanoic acid (PFUnDA)	NA	NA	<4.3	<4.3	<4.4	<12	<4.3	68	73	88

TABLE 3
SUMMARY OF GROUNDWATER ANALYTICAL DATA - PFAS
FORMER TANNERY SITE
PLAINFIELD TOWNSHIP, MICHIGAN

LOCATION	PART 201 RESIDENTIAL GROUNDWATER CLEANUP CRITERIA - DRINKING WATER USES	TMW-101	TMW-101	TMW-101	TMW-102	TMW-102	TMW-103	TMW-104	TMW-105	TMW-105	TMW-108	TMW-109	TMW-110	TMW-110	TMW-111
SAMPLE NAME		TMW-101	TMW-101	TMW-101	TMW-102	TMW-102	TMW-103	TMW-104	TMW-105	TMW-105	TMW-108	TMW-109	TMW-110	TMW-110	TMW-111
LAB ID		K1713784-023	K1713966-003	TD18026-004	K1709280-016	K1713517-003	K1713784-017	K1713784-020	K1709280-013	K1713784-011	K1713517-002	K1713517-001	K1709280-001	K1713517-008	K1713517-009
SAMPLE DATE		12/19/2017	12/28/2017	04/16/2018	09/01/2017	12/12/2017	12/19/2017	12/19/2017	09/01/2017	12/18/2017	12/12/2017	12/12/2017	08/31/2017	12/13/2017	12/13/2017
Parameter (ng/L)															
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	<1500	<1500	<180	<4.3	<4.3	4.7	<12	11	<30	<4.3	<4.4	13	<30	<4.3
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<1500	<1500	<180	<4.3	<4.3	<4.3	<12	<4.2	<30	<4.3	<4.4	<4.2	<30	<4.3
N-Ethyl perfluorooctane sulfonamide (EtFOSA)	NA	<1500	<1500	<180	<4.3	<4.3	<4.3	<12	11	<30	<4.3	<4.4	<4.2	<30	<4.3
N-Ethyl perfluorooctane sulfonamidoethanol	NA	<1500	<1500	NS	<4.3	<4.3	<4.3	<12	<4.2	<30	<4.3	<4.4	<4.2	<30	<4.3
N-Methyl perfluorooctane sulfonamide (MeFOSA)	NA	<1500	<1500	<360	<4.3	<4.3	<4.3	<12	7.5	<30	<4.3	<4.4	<4.2	<30	<4.3
N-Methyl perfluorooctane sulfonamidoethanol	NA	<1500	<1500	NS	<4.3	<4.3	10	<12	<4.2	<30	<4.3	<4.4	<4.2	<30	<4.3
Perfluorobutane sulfonic acid (PFBS)	NA	<1500	<1500	650	1100	610	480	490	2000	2000	680	300	510	480	660
Perfluorobutanoic acid (PFBA)	NA	<3000	<3000	510	560	79	59	52	330	440	93	37	<8.3	80	73
Perfluorodecane sulfonic acid (PFDS)	NA	<1500	<1500	<180	6400	<4.3	<4.3	<12	220	<30	<4.3	<4.4	<4.2	<30	<4.3
Perfluorodecanoic acid (PFDA)	NA	<1500	<1500	<180	99	30	43	46	360	260	26	31	52	73	54
Perfluorododecanoic acid (PFDoDA)	NA	<1500	<1500	<180	<4.3	<4.3	<4.3	<12	4.3	<30	<4.3	<4.4	<4.2	<30	<4.3
Perfluoroheptane sulfonic acid (PFHpS)	NA	<1500	<1500	990	1300	460	200	240	570	620	370	130	730	840	320
Perfluoroheptanoic acid (PFHpA)	NA	6700	11000	5600	11000	700	310	200	950	1100	690	170	1200	1100	560
Perfluorohexane sulfonic acid (PFHxS)	NA	4900	7900	3200	8500	1400	550	500	1200	1200	1200	240	1700	1900	950
Perfluorohexanoic acid (PFHxA)	NA	7300	11000	5700	11000	400	240	140	980	1400	380	140	1100	970	240
Perfluorononanoic acid (PFNA)	NA	<1500	<1500	<180	380	150	76	67	370	290	140	37	240	240	230
Perfluorooctane sulfonamide (FOSA)	NA	<1500	<1500	<180	210	<4.3	470	26	1400	1000	<4.3	190	4.7	<30	9
Perfluorooctane sulfonic acid (PFOS)	70	160000	250000	250000	330000	5300	3800	6200	23000	27000	5900	3200	9100	14000	4400
Perfluorooctanoic acid (PFOA)	70	81000	140000	88000	160000	3900	2000	1700	5300	6100	3500	1000	6400	5600	3300
Perfluoropentanoic acid (PPPeA)	NA	<1500	1800	1200	1700	180	95	59	370	540	190	66	280	240	88
Perfluorotetradecanoic acid (PFTeDA)	NA	<1500	<1500	<180	<4.3	<4.3	<4.3	<12	<4.2	<30	<4.3	<4.4	<4.2	<30	<4.3
Perfluorotridecanoic acid (PFTrDA)	NA	<1500	<1500	<180	<4.3	<4.3	<4.3	<12	<4.2	<30	<4.3	<4.4	<4.2	<30	<4.3
Perfluoroundecanoic acid (PFUnDA)	NA	<1500	<1500	<180	150	9.9	170	57	500	420	12	71	13	<30	150
Perfluorononane sulfonic acid (PFNS)	NA	NS	NS	1700	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Perfluoropentane sulfonic acid (PPPeS)	NA	NS	NS	NS	460	NS									

NOTES:

1. Concentration and criteria units are nano-grams per liter (ng/L) or parts per trillion (ppt); "< RL" indicates the compound was analyzed for but not detected above the method detection limit; RL = Reporting Limit

2. Bold indicates that compound was detected above the RL. Italic number with thick line border or italic chemical indicates that compound was detected above the USEPA Health Advisory for Drinking Water Uses.

3. Michigan Part 201 groundwater cleanup criteria protective of drinking water uses were based on USEPA Health Advisory Level obtained from USEPA Fact sheet: PFOA & PFOS Drinking Water Health Advisories, EPA 800-F-16-003, dated November 2016.

TABLE 3
 SUMMARY OF GROUNDWATER ANALYTICAL DATA - PFAS
 FORMER TANNERY SITE
 PLAINFIELD TOWNSHIP, MICHIGAN

LOCATION	PART 201 RESIDENTIAL GROUNDWATER CLEANUP CRITERIA - DRINKING WATER USES	TN-MW-1	TN-MW-2	TN-MW-3	TN-MW-301B	TN-MW-301C	TN-MW-301D	TN-MW-302A	TN-MW-302A	TN-MW-302B	TN-MW-303A	TN-MW-303B	TN-MW-303C	TN-MW-303D	TN-MW-303E	
SAMPLE NAME		MW-1	MW-2	MW-3	MW-301B	MW-301C	MW-301C	MW-301D	MW-302A	TMW-302A	MW-302B	MW-303A	MW-303B	MW-303C	MW-303D	MW-303E
LAB ID		K1713784-019	K1713784-018	K1713517-004	K1713784-022	K1802382-007	TD18026-005	K1802382-009	K1713517-022	K1709280-014	K1713517-023	K1713784-003	K1713784-001	K1713784-002	K1802382-006	K1802382-008
SAMPLE DATE		12/19/2017	12/19/2017	12/12/2017	12/19/2017	03/13/2018	04/16/2018	03/13/2018	12/14/2017	09/01/2017	12/14/2017	12/15/2017	12/15/2017	12/15/2017	03/13/2018	03/13/2018
Parameter (ng/L)																
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	<4.3	<1500	13	<30	<16000	<370	<5	<30	19	<4.3	<30	<30	160	<4.6	<4.6
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<4.3	<1500	<4.3	<30	<16000	<370	<5	<30	<4.3	<4.3	<30	<30	<30	<4.6	<4.6
N-Ethyl perfluoroctane sulfonamide (EtFOSA)	NA	57	<1500	8.7	<30	<16000	<370	<5	<30	<4.3	<4.3	<30	<30	<30	<4.6	<4.6
N-Ethyl perfluoroctane sulfonamidoethanol	NA	<4.3	<1500	<4.3	<30	<16000	NS	<5	<30	<4.3	<4.3	<30	<30	<30	<4.6	<4.6
N-Methyl perfluoroctane sulfonamide (MeFOSA)	NA	9.9	<1500	<4.3	<30	<16000	<750	<5	<30	<4.3	<4.3	<30	<30	<30	<4.6	<4.6
N-Methyl perfluoroctane sulfonamidoethanol	NA	<4.3	<1500	<4.3	<30	<16000	NS	<5	<30	<4.3	<4.3	<30	<30	<30	<4.6	<4.6
Perfluorobutane sulfonic acid (PFBS)	NA	2700	<1500	730	1100	<16000	1300	<5	2700	4500	3300	31000	17000	9600	6.5	<4.6
Perfluorobutanoic acid (PFBA)	NA	100	<3000	110	290	<31000	970	<10	530	460	170	620	700	1700	<9.3	<9.3
Perfluorodecane sulfonic acid (PFDS)	NA	<4.3	<1500	<4.3	<30	<16000	<370	<5	<30	40	52	81	<30	<30	<4.6	<4.6
Perfluorodecanoic acid (PFDA)	NA	55	<1500	54	53	<16000	<370	<5	48	82	63	110	66	83	<4.6	<4.6
Perfluorododecanoic acid (PFDoDA)	NA	<4.3	<1500	4.8	<30	<16000	<370	<5	<30	<4.3	12	<30	<30	<30	<4.6	<4.6
Perfluoroheptane sulfonic acid (PFHpS)	NA	110	<1500	220	370	<16000	2700	<5	310	170	180	760	930	470	<4.6	<4.6
Perfluoroheptanoic acid (PFHpA)	NA	130	<1500	940	1400	17000	16000	<5	1100	550	300	940	1200	2000	<4.6	<4.6
Perfluorohexane sulfonic acid (PFHxS)	NA	270	<1500	610	1700	<16000	12000	<5	1900	610	550	1700	2500	2100	<4.6	<4.6
Perfluorohexanoic acid (PFHxA)	NA	100	<1500	520	2200	17000	21000	<5	900	530	280	880	1100	3100	4.7	<4.6
Perfluorononanoic acid (PFNA)	NA	38	<1500	100	130	<16000	<370	<5	150	160	62	250	180	260	<4.6	<4.6
Perfluoroctane sulfonamide (FOSA)	NA	710	<1500	600	82	<16000	<370	<5	1500	1200	850	910	310	820	<4.6	<4.6
Perfluoroctane sulfonic acid (PFOS)	70	2600	38000	5000	27000	1500000	490000	48	15000	9600	6800	39000	23000	23000	7.4	<4.6
Perfluoroctanoic acid (PFOA)	70	540	2200	3600	11000	230000	180000	28	7100	3100	1700	4600	5000	8400	7	<1.9
Perfluoropentanoic acid (PFPeA)	NA	83	<1500	170	490	<16000	2600	<5	320	250	130	480	510	1200	<4.6	<4.6
Perfluorotetradecanoic acid (PFTeDA)	NA	<4.3	<1500	<4.3	<30	<16000	<370	<5	<30	<4.3	<4.3	<30	<30	<4.6	<4.6	
Perfluorotridecanoic acid (PFTrDA)	NA	18	<1500	7.6	<30	<16000	<370	<5	<30	45	43	<30	<30	<4.6	<4.6	
Perfluoroundecanoic acid (PFUnDA)	NA	98	<1500	240	64	<16000	<370	<5	280	200	270	430	130	130	<4.6	<4.6
Perfluorononane sulfonic acid (PFNS)	NA	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Perfluoropentane sulfonic acid (PFPeS)	NA	NS	NS	NS	NS	NS	NS	1100	NS							

TABLE 3
SUMMARY OF GROUNDWATER ANALYTICAL DATA - PFAS
FORMER TANNERY SITE
PLAINFIELD TOWNSHIP, MICHIGAN

LOCATION	PART 201 RESIDENTIAL GROUNDWATER CLEANUP CRITERIA - DRINKING WATER USES	TN-MW-304A	TN-MW-304A	TN-MW-304A	TN-MW-304A	TN-MW-304A	TN-MW-304B	TN-MW-305B	TN-MW-305C	TN-MW-305C	TN-MW-306A	TN-MW-306A	TN-MW-306B	TN-MW-307A	TN-MW-307A	TN-MW-307A	TN-MW-307B
SAMPLE NAME		MW-304A	MW-304A	MW-304A	MW-304A	MW-304A (DUP)	MW-304B	MW-305B	MW-305C	MW-305C	MW-306A	MW-306A	MW-306B	MW-307A	MW-307A	MW-307A (DUP)	MW-307B
LAB ID		K1709280-010	K1713784-008	K1713966-002	TD18026-002	TD18026-008	K1713784-009	K1713517-019	K1713517-020	TD18026-001	K1709280-004	K1713517-017	K1713517-018	K1709280-003	K1713517-011	K1709280-002	K1713517-010
SAMPLE DATE	09/01/2017	12/18/2017	12/28/2017	04/16/2018	04/16/2018	12/18/2017	12/14/2017	12/14/2017	04/16/2018	08/31/2017	12/14/2017	12/14/2017	08/31/2017	12/13/2017	08/31/2017	12/13/2017	12/13/2017
Parameter (ng/L)																	
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	56	<1500	<30	<75	<76	4.7	300	500	450	25	59	20	<4.4	<4.3	<4.3	<4.3
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<4.7	<1500	<30	<75	<76	<4.7	<30	<30	<35	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
N-Ethyl perfluoroctane sulfonamide (EtFOSA)	NA	<4.7	<1500	<30	<75	<76	<4.7	<30	<30	<35	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
N-Ethyl perfluoroctane sulfonamidoethanol	NA	<4.7	<1500	<30	NS	NS	<4.7	<30	<30	NS	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
N-Methyl perfluoroctane sulfonamide (MeFOSA)	NA	<4.7	<1500	<30	<150	<150	<4.7	<30	<30	<71	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
N-Methyl perfluoroctane sulfonamidoethanol	NA	<4.7	<1500	<30	NS	NS	<4.7	<30	<30	NS	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
Perfluorobutane sulfonic acid (PFBS)	NA	2800	1800	1900	1900	2000	260	11000	18000	16000	1400	3900	1300	670	68	700	620
Perfluorobutanoic acid (PFBA)	NA	540	<3000	290	240	250	150	5100	6600	6800	310	810	280	100	28	99	82
Perfluorodecane sulfonic acid (PFDS)	NA	160	<1500	34	<75	<76	<4.7	<30	<30	<35	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
Perfluorodecanoic acid (PFDA)	NA	360	<1500	420	280	350	11	150	270	210	93	74	70	16	<4.3	16	13
Perfluorododecanoic acid (PFDoDA)	NA	<4.7	<1500	<30	<75	<76	<4.7	<30	<30	<35	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
Perfluoroheptane sulfonic acid (PFHpS)	NA	750	<1500	820	560	620	30	1100	1100	800	270	250	200	490	<4.3	420	740
Perfluoroheptanoic acid (PFHpA)	NA	1100	<1500	810	660	640	110	10000	11000	10000	710	1700	570	760	50	730	670
Perfluorohexane sulfonic acid (PFHxS)	NA	1300	1600	1300	1600	1900	210	4300	4200	6400	1200	1400	870	1500	26	1200	1700
Perfluorohexanoic acid (PFHxA)	NA	1200	<1500	790	660	660	310	29000	25000	26000	670	2300	680	500	60	440	470
Perfluorononanoic acid (PFNA)	NA	560	<1500	430	250	280	16	750	770	610	310	200	140	200	<4.3	190	130
Perfluoroctane sulfonamide (FOSA)	NA	800	<1500	740	340	320	46	<30	84	<35	410	100	450	<4.4	<4.3	<4.3	<4.3
Perfluoroctane sulfonic acid (PFOS)	70	180000	47000	61000	70000	58000	1000	19000	33000	37000	9700	7000	9600	4000	11	5600	4400
Perfluoroctanoic acid (PFOA)	70	5400	3100	3800	3700	3700	360	29000	40000	40000	4400	8700	3100	5900	130	5900	4600
Perfluoropentanoic acid (PFPeA)	NA	450	<1500	270	230	230	77	5300	6100	6100	280	670	250	160	36	150	160
Perfluorotetradecanoic acid (PFTeDA)	NA	<4.7	<1500	<30	<75	<76	<4.7	<30	<30	<35	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
Perfluorotridecanoic acid (PFTrDA)	NA	13	<1500	<30	<75	<76	<4.7	<30	<30	<35	<4.4	<30	<12	<4.4	<4.3	<4.3	<4.3
Perfluoroundecanoic acid (PFUnDA)	NA	780	<1500	780	890	870	<4.7	32	240	280	170	210	140	14	<4.3	14	8.5
Perfluorononane sulfonic acid (PFNS)	NA	NS	NS	NS	170	190	NS	NS	NS	<71	NS	NS	NS	NS	NS	NS	NS
Perfluoropentane sulfonic acid (PFPeS)	NA	NS	NS	NS	NS	340	380	NS	NS	NS	2600	NS	NS	NS	NS	NS	NS

TABLE 3
SUMMARY OF GROUNDWATER ANALYTICAL DATA - PFAS
FORMER TANNERY SITE
PLAINFIELD TOWNSHIP, MICHIGAN

LOCATION	PART 201 RESIDENTIAL GROUNDWATER CLEANUP CRITERIA - DRINKING WATER USES	TN-MW-308A	TN-MW-308B	TN-MW-308C	TN-MW-309A	TN-MW-309B	TN-MW-309C	TN-MW-309D	TN-MW-309D	TN-MW-310A	TN-MW-310B	TN-MW-310C	TN-MW-4	TN-MW-5	TN-MW-5	TN-MW-5
SAMPLE NAME		MW-308A	MW-308B	MW-308C	MW-309A	MW-309B	MW-309C	MW-309D	MW-309D	MW-310A	MW-310B	MW-310C	MW-4	MW-5	MW-5	MW-5
LAB ID		K1713517-016	K1713517-015	K1713517-014	K1713784-013	K1713784-012	K1802382-010	K1802382-003	TD18026-003	K1713784-028	K1713784-026	K1713784-027	K1713517-005	K1709280-005	K1713517-021	K1713966-001
SAMPLE DATE		12/14/2017	12/14/2017	12/14/2017	12/18/2017	12/18/2017	03/13/2018	03/13/2018	04/16/2018	12/20/2017	12/20/2017	12/20/2017	12/12/2017	08/31/2017	12/14/2017	12/28/2017
Parameter (ng/L)																
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	<30	<4.3	<4.3	18	<30	<50	<50	<72	<4.3	<4.3	<4.3	210	7.4	<30	<30
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<30	<4.3	<4.3	<12	<30	<50	<50	<72	<4.3	<4.3	<4.3	<30	<4.3	<30	<30
N-Ethyl perfluoroctane sulfonamide (EtFOSA)	NA	<30	<4.3	<4.3	<12	<30	<50	<50	<72	29	<4.3	<4.3	1200	<4.3	<30	<30
N-Ethyl perfluoroctane sulfonamidoethanol	NA	<30	<4.3	<4.3	<12	<30	<50	<50	NS	<4.3	<4.3	<4.3	<30	<4.3	<30	<30
N-Methyl perfluoroctane sulfonamide (MeFOSA)	NA	<30	<4.3	<4.3	<12	<30	<50	<50	<140	18	<4.3	<4.3	<30	<4.3	<30	<30
N-Methyl perfluoroctane sulfonamidoethanol	NA	<30	<4.3	<4.3	<12	<30	<50	<50	NS	<4.3	<4.3	<4.3	<30	<4.3	<30	<30
Perfluorobutane sulfonic acid (PFBS)	NA	360	<4.3	<4.3	830	740	710	680	730	370	140	170	7500	150	290	330
Perfluorobutanoic acid (PFBA)	NA	170	<8.7	<8.7	150	140	190	170	150	32	22	120	2000	42	<60	94
Perfluorodecane sulfonic acid (PFDS)	NA	<30	<4.3	<4.3	<12	<30	<50	<50	<72	<4.3	<4.3	<4.3	<30	69	<30	<30
Perfluorodecanoic acid (PFDA)	NA	34	<4.3	<4.3	23	39	<50	53	<72	31	52	<4.3	600	120	71	100
Perfluorododecanoic acid (PFDoDA)	NA	<30	<4.3	<4.3	<12	<30	<50	<50	<72	<4.3	<4.3	<4.3	<30	7.3	<30	<30
Perfluoroheptane sulfonic acid (PFHpS)	NA	350	<4.3	<4.3	440	550	460	510	470	59	95	<4.3	960	180	210	320
Perfluoroheptanoic acid (PFHpA)	NA	1300	<4.3	<4.3	620	520	740	750	580	88	75	130	4600	310	380	530
Perfluorohexane sulfonic acid (PFHxS)	NA	1300	<4.3	<4.3	980	830	1300	1200	1200	230	240	13	2800	980	920	980
Perfluorohexanoic acid (PFHxA)	NA	820	6.1	<4.3	570	430	900	830	640	96	57	290	5900	290	250	510
Perfluorononanoic acid (PFNA)	NA	170	<4.3	<4.3	81	180	110	160	110	17	20	<4.3	910	180	88	140
Perfluorooctane sulfonamide (FOSA)	NA	<30	<4.3	<4.3	540	59	<50	<50	<72	1600	1800	<4.3	6600	2000	950	1500
Perfluorooctane sulfonic acid (PFOS)	70	12000	<4.3	6.4	6200	18000	13000	34000	50000	1500	2000	16	38000	18000	12000	14000
Perfluorooctanoic acid (PFOA)	70	9000	<1.7	2.5	6400	5000	8800	11000	7600	590	590	73	19000	2600	2700	3300
Perfluoropentanoic acid (PFPeA)	NA	580	<4.3	<4.3	200	180	290	230	210	61	39	170	1700	59	85	130
Perfluorotetradecanoic acid (PFTeDA)	NA	<30	<4.3	<4.3	<12	<30	<50	<50	<72	<4.3	<4.3	<4.3	<30	<4.3	<30	<30
Perfluorotridecanoic acid (PFTrDA)	NA	<30	<4.3	<4.3	<12	<30	<50	<50	<72	<4.3	<4.3	<4.3	<30	<4.3	<30	<30
Perfluoroundecanoic acid (PFUnDA)	NA	<30	<4.3	<4.3	280	75	<50	60	81	35	38	<4.3	3300	830	300	630
Perfluorononane sulfonic acid (PFNS)	NA	NS	210	NS												
Perfluoropentane sulfonic acid (PFPeS)	NA	NS	230	NS												

TABLE 3
 SUMMARY OF GROUNDWATER ANALYTICAL DATA - PFAS
 FORMER TANNERY SITE
 PLAINFIELD TOWNSHIP, MICHIGAN

LOCATION	PART 201 RESIDENTIAL GROUNDWATER CLEANUP CRITERIA - DRINKING WATER USES	TN-P-1	TN-P-2	TN-P-2	TN-P-3	TN-P-3	TN-P-3	TN-P-4	TN-P-5
		P-1	P-2	P-2	P-3	P-3	P-3 (DUP)	P-4	P-5
SAMPLE NAME	K1713784-021	K1709280-006	K1713784-004	K1709280-009	K1713784-005	K1709280-011	K1713784-010	K1713784-016	
LAB ID	12/19/2017	08/31/2017	12/15/2017	09/01/2017	12/15/2017	09/01/2017	12/18/2017	12/19/2017	
Parameter (ng/L)									
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	13	41	40	77	61	74	34	<1500
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<12	<4.3	<30	<4.3	<30	<4.3	<30	<1500
N-Ethyl perfluorooctane sulfonamide (EtFOSA)	NA	<12	<4.3	<30	<4.3	<30	<4.3	<30	<1500
N-Ethyl perfluorooctane sulfonamidoethanol	NA	<12	<4.3	<30	<4.3	<30	<4.3	<30	<1500
N-Methyl perfluorooctane sulfonamide (MeFOSA)	NA	<12	<4.3	<30	<4.3	<30	<4.3	<30	<1500
N-Methyl perfluorooctane sulfonamidoethanol	NA	<12	<4.3	<30	<4.3	<30	<4.3	<30	<1500
Perfluorobutane sulfonic acid (PFBS)	NA	3300	5200	6400	7000	11000	7300	1200	2100
Perfluorobutanoic acid (PFBA)	NA	340	970	810	1500	1200	1400	190	<3000
Perfluorodecane sulfonic acid (PFDS)	NA	<12	<4.3	<30	<4.3	<30	<4.3	90	<1500
Perfluorodecanoic acid (PFDA)	NA	36	27	<30	100	75	110	220	<1500
Perfluorododecanoic acid (PFDoDA)	NA	<12	<4.3	<30	<4.3	<30	<4.3	<30	<1500
Perfluoroheptane sulfonic acid (PFHpS)	NA	360	1300	1500	680	650	560	380	<1500
Perfluoroheptanoic acid (PFHpA)	NA	1100	1700	1400	2200	1900	2600	340	<1500
Perfluorohexane sulfonic acid (PFHxS)	NA	1700	4200	3800	3500	5000	4200	610	2000
Perfluorohexanoic acid (PFHxA)	NA	910	1900	1400	2800	3400	2800	410	<1500
Perfluorononanoic acid (PFNA)	NA	130	410	320	430	250	430	190	<1500
Perfluorooctane sulfonamide (FOSA)	NA	610	160	170	130	120	130	1300	<1500
Perfluorooctane sulfonic acid (PFOS)	70	7700	30000	23000	22000	14000	24000	21000	46000
Perfluorooctanoic acid (PFOA)	70	4900	14000	11000	10000	9500	11000	2000	6200
Perfluoropentanoic acid (PFPeA)	NA	340	640	540	1400	1100	1500	170	<1500
Perfluorotetradecanoic acid (PFTeDA)	NA	<12	<4.3	<30	<4.3	<30	<4.3	<30	<1500
Perfluorotridecanoic acid (PFTrDA)	NA	<12	<4.3	<30	<4.3	<30	<4.3	<30	<1500
Perfluoroundecanoic acid (PFUnDA)	NA	170	5.5	<30	140	140	150	600	1500
Perfluorononane sulfonic acid (PFNS)	NA	NS							
Perfluoropentane sulfonic acid (PFPeS)	NA	NS							

TABLE 4
SUMMARY OF SOIL AND SCRAP SAMPLE ANALYTICAL DATA - PFAS
FORMER TANNERY SITE
ROCKFORD, MICHIGAN

SAMPLE NAME	MDEQ Proposed Part 201 Residential Soil Cleanup Criteria Protective of Groundwater for Drinking Water Uses	MDEQ Proposed Part 201 Residential Soil Cleanup Criteria - Direct Contact	C1	C2	Leather Scraps
LABORATORY ID		K1712691-001	K1712691-002	K1712691-004	
SAMPLE DATE		11/21/2017	11/21/2017	11/21/2017	
Parameter (ng/Kg)					
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	NA	<980	<960	<1000
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	NA	<980	<960	<1000
N-Ethyl perfluorooctane sulfonamide (EtFOSA)	NA	NA	<980	2800	<1000
N-Ethyl perfluorooctane sulfonamidoethanol	NA	NA	<980	2000	<1000
N-Methyl perfluorooctane sulfonamide (MeFOSA)	NA	NA	<980	1300	<1000
N-Methyl perfluorooctane sulfonamidoethanol	NA	NA	<980	<960	<1000
Perfluorobutane sulfonic acid (PFBS)	NA	NA	8400	<960	<1000
Perfluorobutanoic acid (PFBA)	NA	NA	<980	<960	<1000
Perfluorodecane sulfonic acid (PFDS)	NA	NA	<980	<960	1200
Perfluorodecanoic acid (PFDA)	NA	NA	3200	2800	1300
Perfluorododecanoic acid (PFDoDA)	NA	NA	<980	1000	2000
Perfluoroheptane sulfonic acid (PFHpS)	NA	NA	11000	4800	1100
Perfluoroheptanoic acid (PFHpA)	NA	NA	13000	3200	<1000
Perfluorohexane sulfonic acid (PFHxS)	NA	NA	20000	13000	1100
Perfluorohexanoic acid (PFHxA)	NA	NA	4900	1900	<1000
Perfluorononanoic acid (PFNA)	NA	NA	5400	3200	<1000
Perfluorooctane sulfonamide (FOSA)	NA	NA	18000	32000	9600
Perfluorooctane sulfonic acid (PFOS)	1,400	2,100,000	360000	200000	83000
Perfluorooctanoic acid (PFOA)	59,000	2,100,000	80000	33000	2200
Perfluoropentanoic acid (PFPeA)	NA	NA	1600	<960	<1000
Perfluorotetradecanoic acid (PFTeDA)	NA	NA	<980	1000	1700
Perfluorotridecanoic acid (PFTrDA)	NA	NA	13000	28000	30000
Perfluoroundecanoic acid (PFUnDA)	NA	NA	18000	51000	12000

NOTES:

- Concentration and criteria units are nano-grams per kilogram or parts per trillion; "< RL" indicates the compound was analyzed for but not detected above the method detection limit; RL = Reporting Limit
- Bold indicates that compound was detected above the RL. Italic number with thick line border or italic chemical indicates that compound was detected above one of the listed cleanup criteria.
- MDEQ Proposed Part 201 Residential Cleanup Criteria were based on the :Proposed Part 201 Cleanup Criteria Rules," dated August 29, 2017.

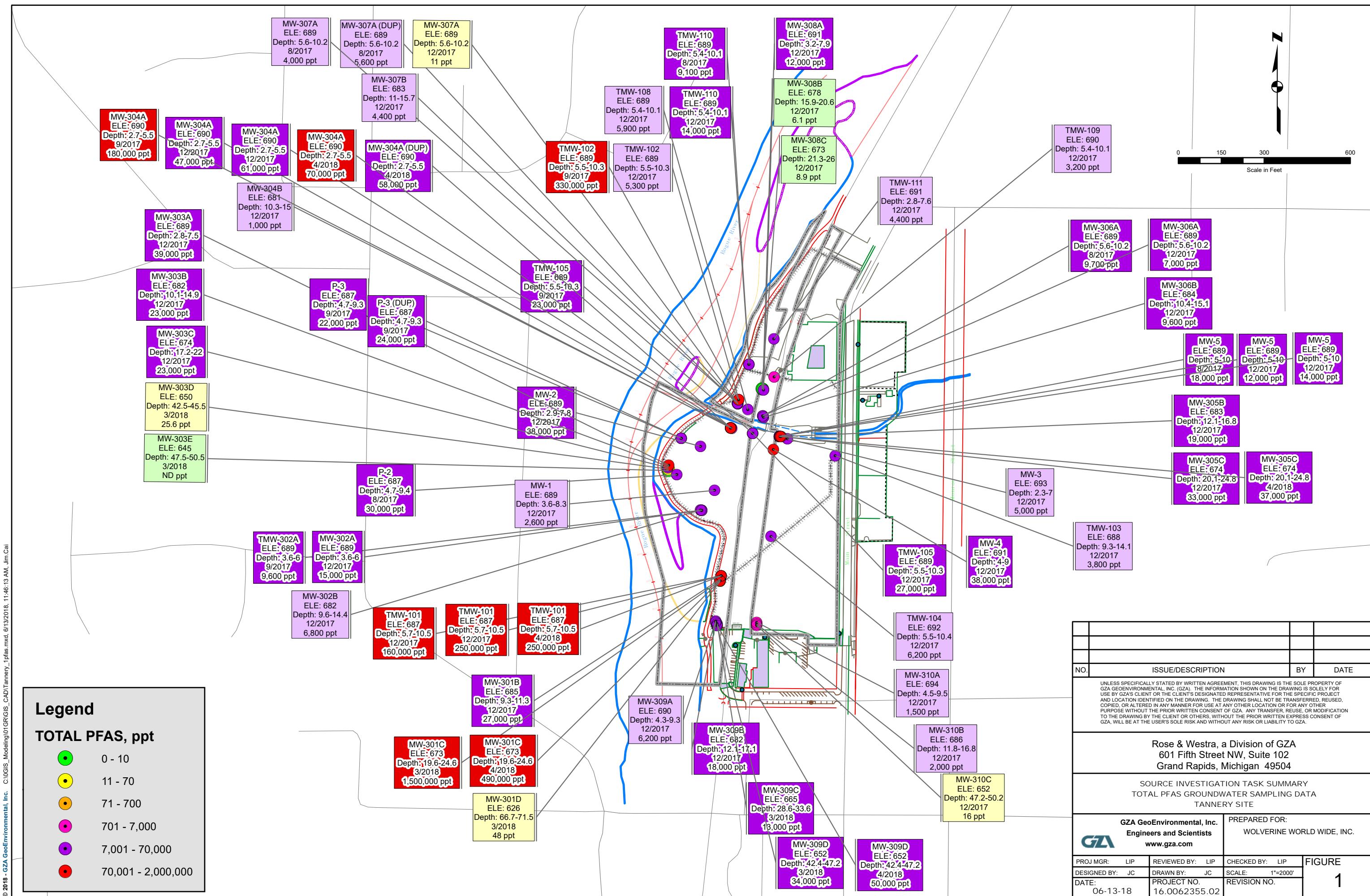
TABLE 5
SUMMARY OF LEATHER SCRAPS LEACHAGE - PFAS
FORMER TANNERY SITE
ROCKFORD, MICHIGAN

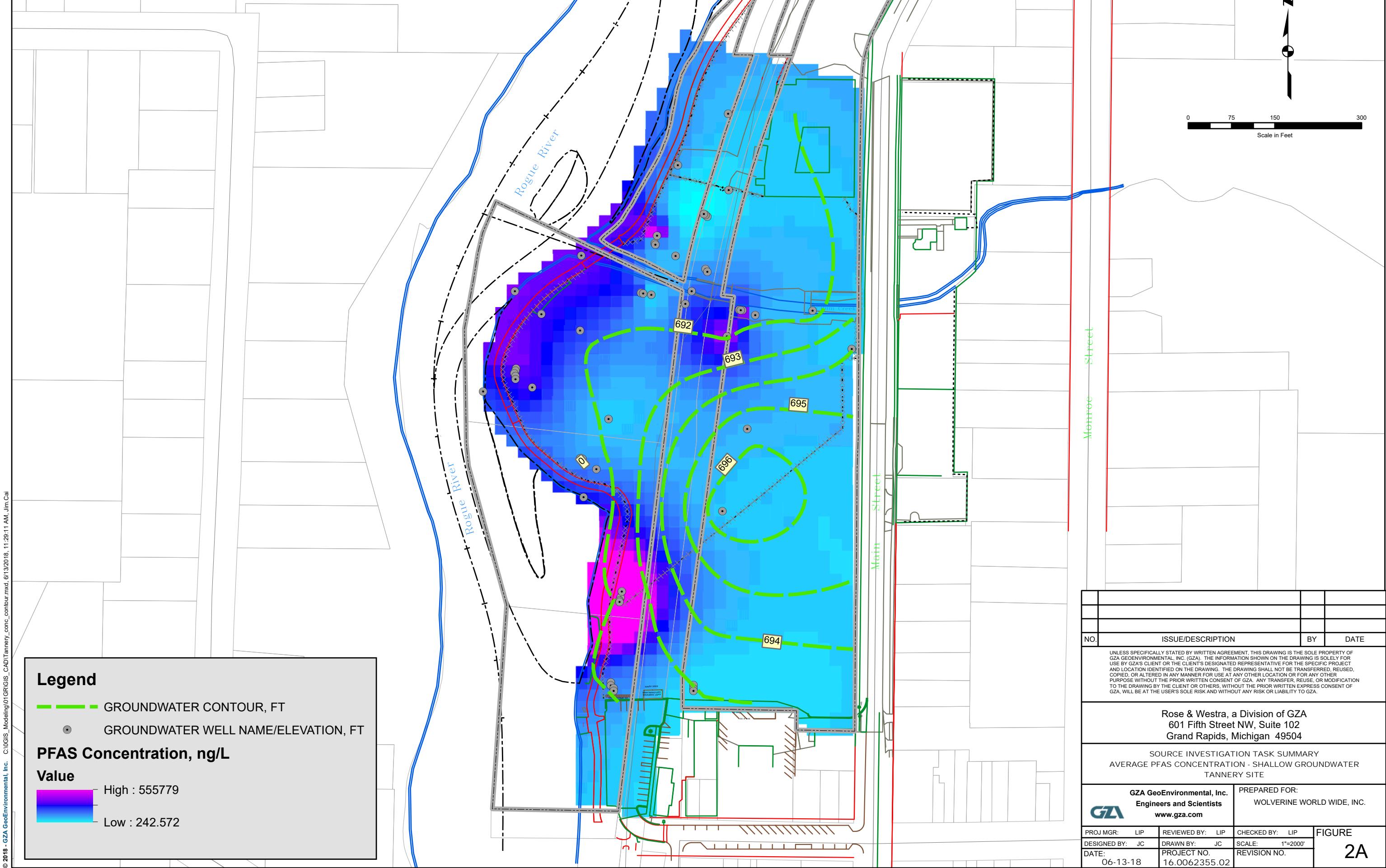
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Page 1 of 1
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SAMPLE NAME	PART 201 RESIDENTIAL GROUNDWATER CLEANUP CRITERIA - DRINKING WATER USES	C1-Leachate	C2-Leachate	Leather Scraps-Leachate
		K1712691-005	K1712691-006	K1712691-007
SAMPLE DATE	11/21/2017	11/21/2017	11/21/2017	
Parameter (ng/L)				
6:2 Fluorotelomer sulfonic acid (6:2 FTS)	NA	<4.4	<4.4	<4.4
8:2 Fluorotelomer sulfonic acid (8:2 FTS)	NA	<4.4	<4.4	<4.4
N-Ethyl perfluoroctane sulfonamide (EtFOSA)	NA	<4.4	<4.4	<4.4
N-Ethyl perfluoroctane sulfonamidoethanol	NA	<4.4	<4.4	<4.4
N-Methyl perfluoroctane sulfonamide (MeFOSA)	NA	<4.4	<4.4	<4.4
N-Methyl perfluoroctane sulfonamidoethanol	NA	<4.4	<4.4	<4.4
Perfluorobutane sulfonic acid (PFBS)	NA	33	19	12
Perfluorobutanoic acid (PFBA)	NA	<9.1	<9.1	<9.1
Perfluorodecane sulfonic acid (PFDS)	NA	<4.4	12	<4.4
Perfluorodecanoic acid (PFDA)	NA	19	46	6.5
Perfluorododecanoic acid (PFDoDA)	NA	<4.4	<4.4	<4.4
Perfluoroheptane sulfonic acid (PFHpS)	NA	69	92	18
Perfluoroheptanoic acid (PFHpA)	NA	45	62	5.6
Perfluorohexane sulfonic acid (PFHxS)	NA	140	130	28
Perfluorohexanoic acid (PFHxA)	NA	25	29	<4.5
Perfluorononanoic acid (PFNA)	NA	32	50	10
Perfluorooctane sulfonamide (FOSA)	NA	250	370	6
Perfluorooctane sulfonic acid (PFOS)	70	2000	2900	640
Perfluorooctanoic acid (PFOA)	70	520	850	95
Perfluoropentanoic acid (PFPeA)	NA	15	44	<4.5
Perfluorotetradecanoic acid (PFTeDA)	NA	<4.4	<4.4	<4.4
Perfluorotridecanoic acid (PFTrDA)	NA	13	21	<4.4
Perfluoroundecanoic acid (PFUnDA)	NA	170	450	30

NOTES:

- Concentration and criteria units are nano-grams per liter (ng/L) or parts per trillion (ppt); "< RL" indicates the compound was analyzed for but not detected above the method detection limit; RL = Reporting Limit
- Bold indicates that compound was detected above the RL. Italic number with thick line border or italic chemical indicates that compound was detected above the USEPA Health Advisory for Drinking Water Uses.
- Michigan Part 201 groundwater cleanup criteria protective of drinking water uses were based on USEPA Health Advisory Level obtained from USEPA Fact sheet: PFOA & PFOS Drinking Water Health Advisories, EPA 800-F-16-003, dated November 2016.
- The cleanup criteria of 70 ppt was established for the combined concentrations of PFOA and PFOS.

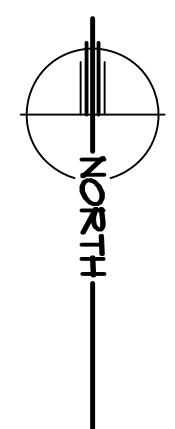




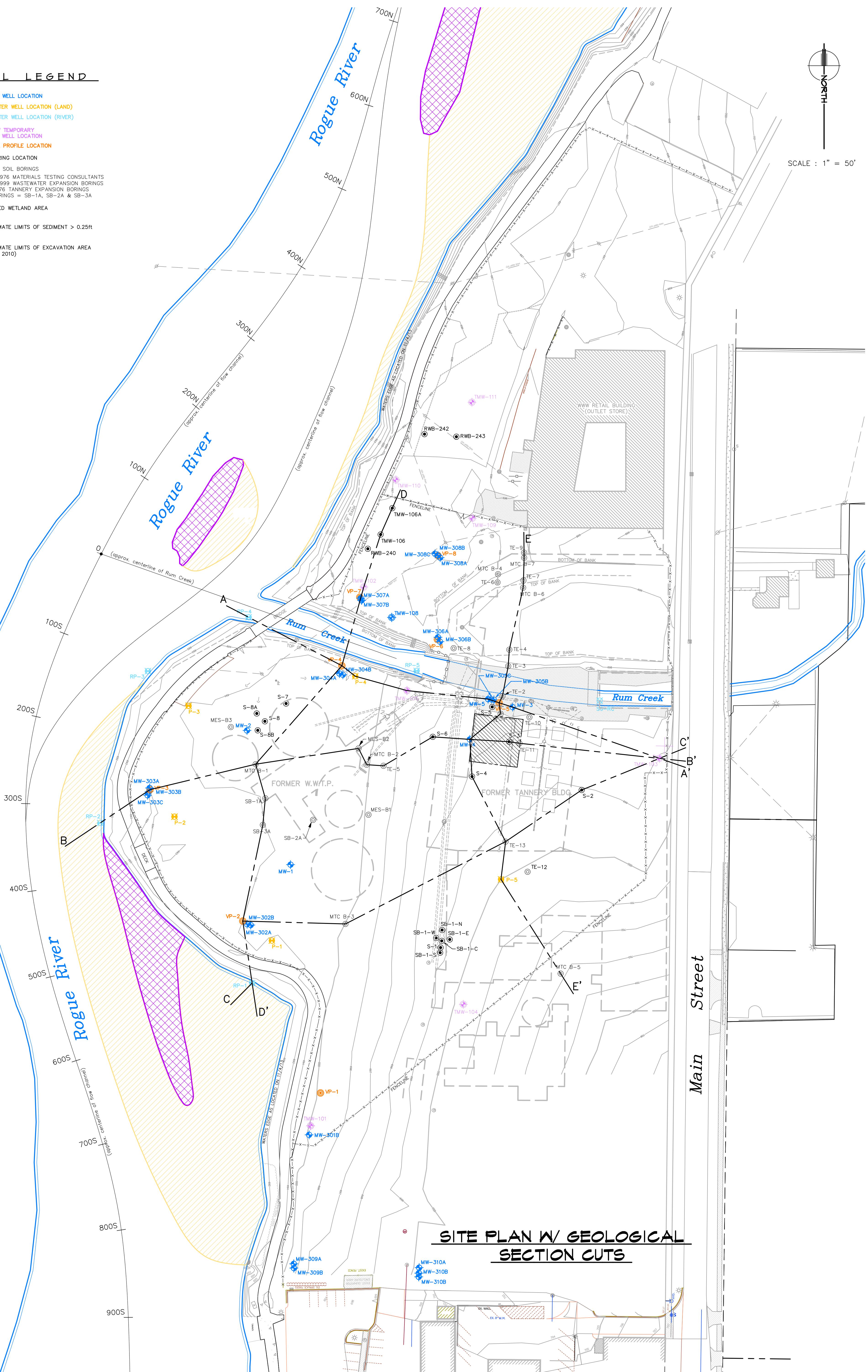


SYMBOL LEGEND

- ◆ = MONITOR WELL LOCATION
- ▣ = PEIZOMETER WELL LOCATION (LAND)
- ▢ = PEIZOMETER WELL LOCATION (RIVER)
- = SHALLOW TEMPORARY MONITOR WELL LOCATION
- = VERTICAL PROFILE LOCATION
- ◎ = SOIL BORING LOCATION
- = HISTORIC SOIL BORINGS
- MTC = 1976 MATERIALS TESTING CONSULTANTS
MES = 1999 WASTEWATER EXPANSION BORINGS
TE = 1976 TANNERY EXPANSION BORINGS
1974 BORINGS = SB-1A, SB-2A & SB-3A
- = VEGETATED WETLAND AREA
- ▨ = APPROXIMATE LIMITS OF SEDIMENT > 0.25ft
- ▨ = APPROXIMATE LIMITS OF EXCAVATION AREA (FALL OF 2010)



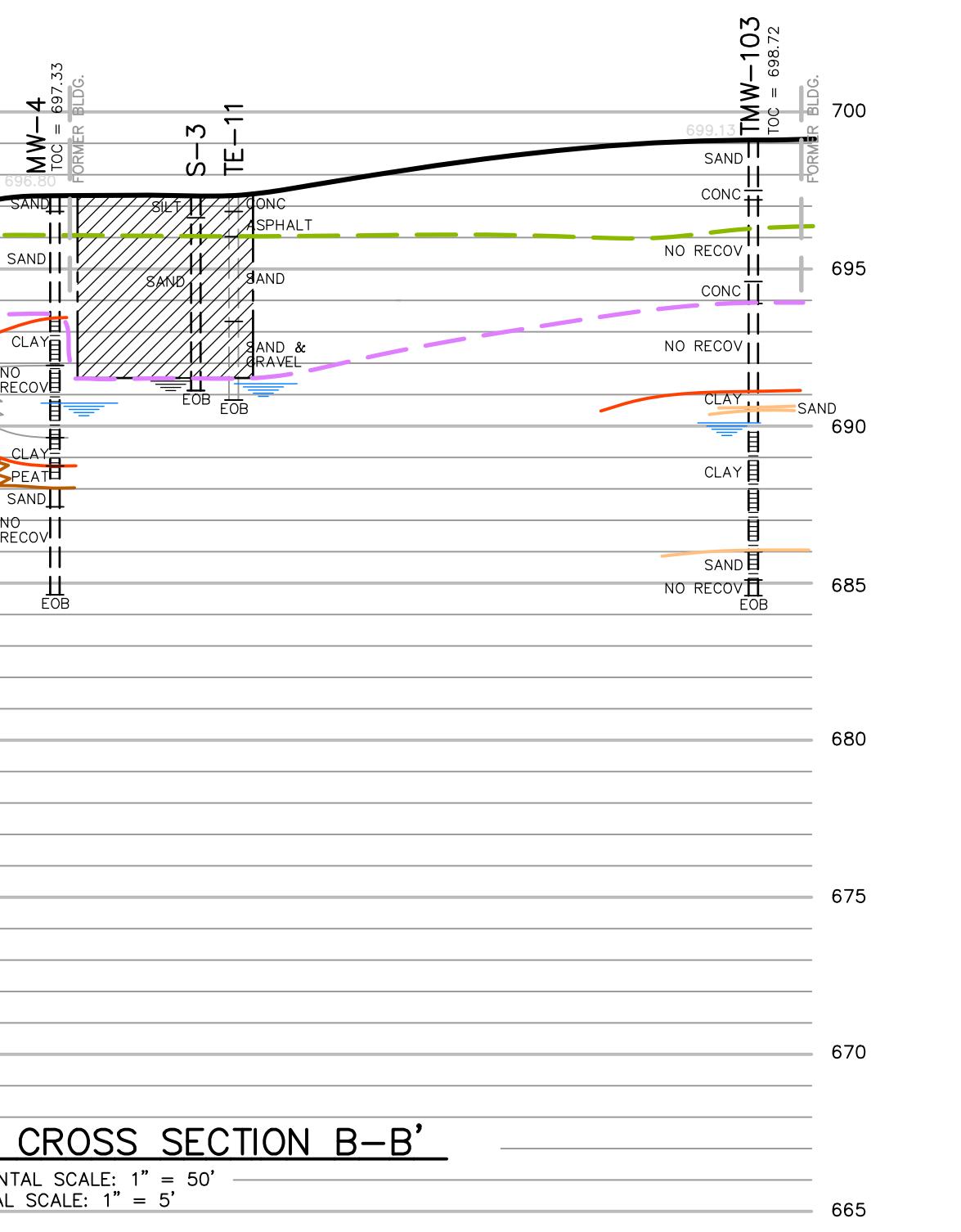
SCALE : 1" = 50'



WOLVERINE WORLD WIDE
FORMER TANNERY - ROCKFORD, MICHIGAN
SOURCE INVESTIGATION
TASK SUMMARY

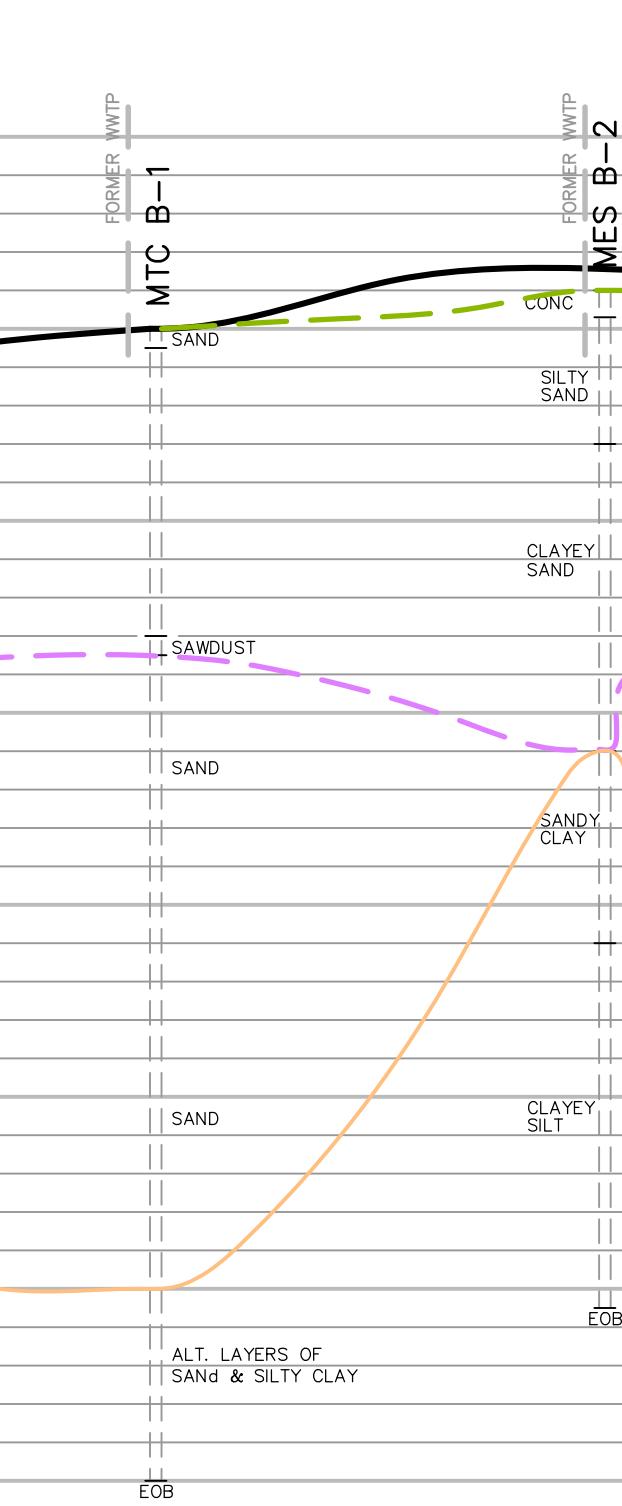
ROSE & WESTRA
A DIVISION OF GZA
Grand Rapids, Michigan
GEOTECHNICAL-ENVIRONMENTAL-ECOLOGICAL-WATER-CONSTRUCTION MANAGEMENT

DRAWN BY FILE NO.: 62335_02_DES
DESIGN BY KJB
DATE 6/12/02



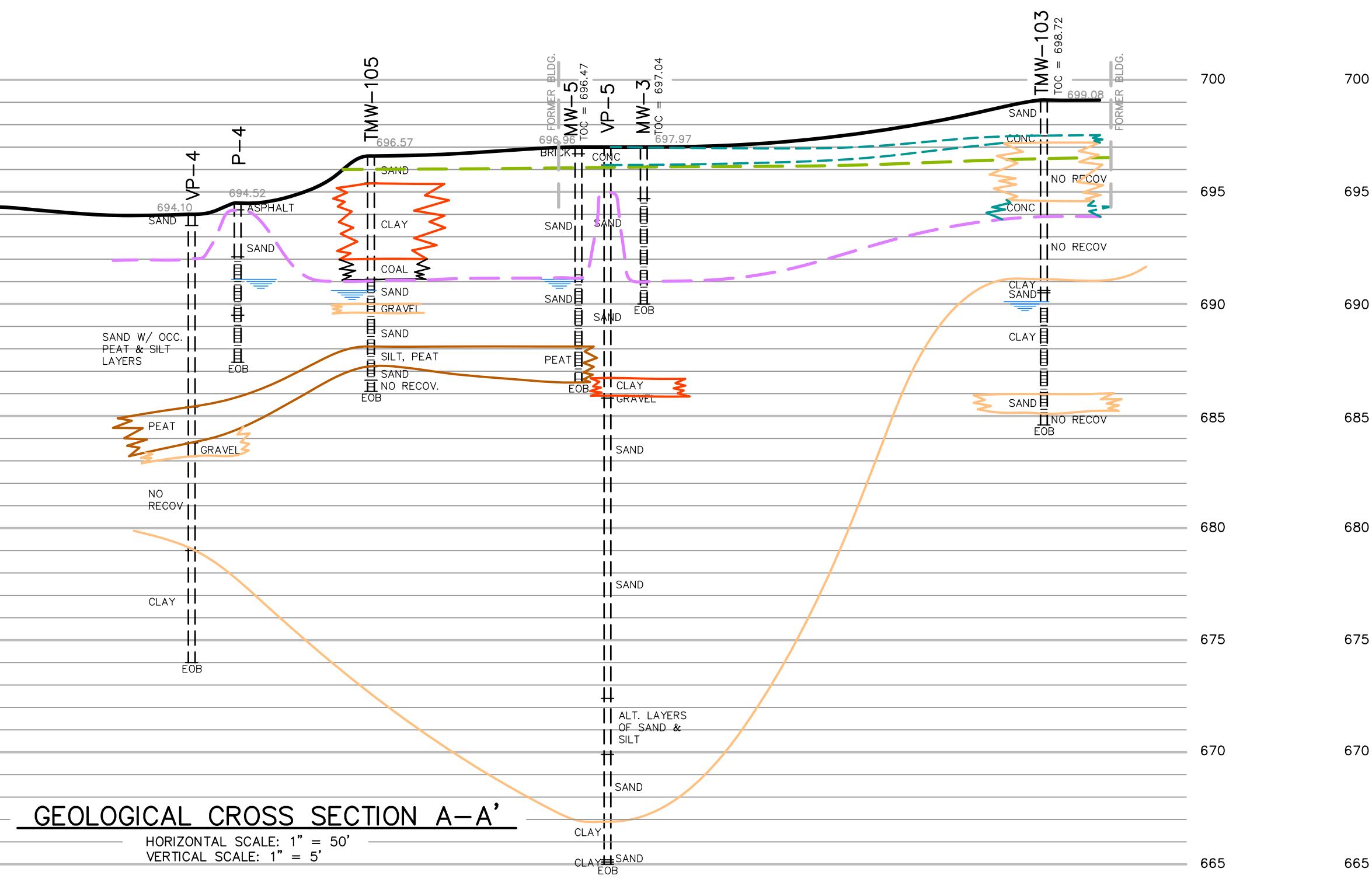
GEOLOGICAL CROSS SECTION B-B'

HORIZONTAL SCALE: 1" = 50'
VERTICAL SCALE: 1" = 5'



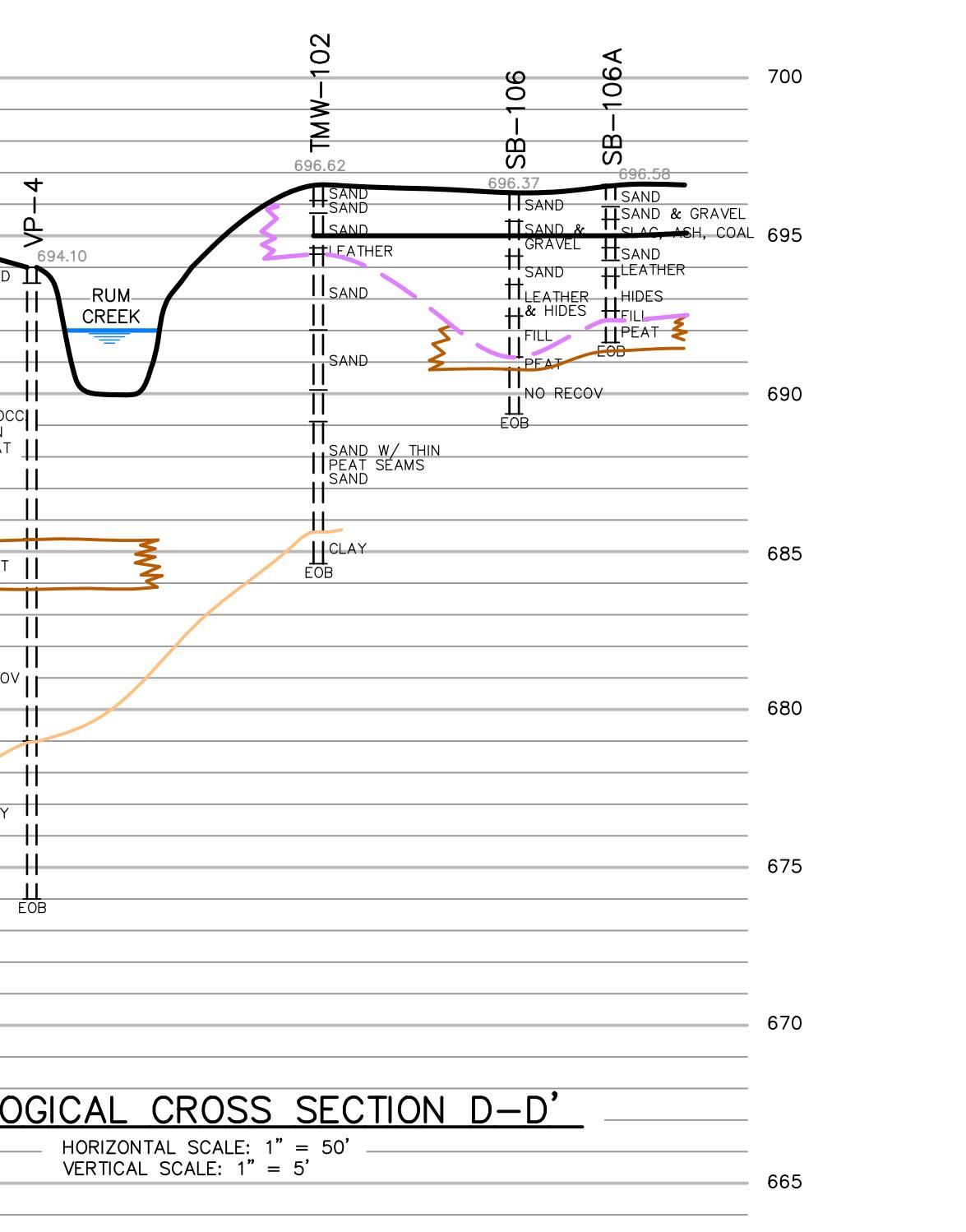
GEOLOGICAL CROSS SECTION A-A'

HORIZONTAL SCALE: 1" = 50'
VERTICAL SCALE: 1" = 5'



GEOLOGICAL CROSS SECTION C-C'

HORIZONTAL SCALE: 1" = 50'
VERTICAL SCALE: 1" = 5'



GEOLOGICAL CROSS SECTION D-D'

HORIZONTAL SCALE: 1" = 50'
VERTICAL SCALE: 1" = 5'

LEGEND
— = BOTTOM OF FILL (POST-TANNERY DEMOLITION)
— = BOTTOM OF FILL (HISTORICAL)

REvised in accordance with construction records