



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 7, 2018

VIA E-MAIL AND U.S. MAIL

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

Dear Mr. Latchana:

SUBJECT: Department of Environmental Quality Response to the "Off-Site Groundwater Investigation Scope of Work" dated June 29, 2018, Former Wolverine Tannery, 123 Main Street, Rockford, Michigan.

Staff from the Department of Environmental Quality (DEQ), Remediation and Redevelopment Division, have reviewed the report titled, "Off-Site Groundwater Investigation Scope of Work", for the Former Wolverine Tannery Site (Site), prepared by GZA, dated June 29, 2018. Based on our review, we have the following comments and/or requests that should be addressed in future work activities:

1. Task 1 Comments:

- a. Based on the close proximity of the four (4) "off-site" proposed nested monitoring well locations to the Former Tannery Site (Site), the DEQ anticipates additional phases of off-site groundwater investigation activities to be required and completed in order to achieve full vertical and horizontal delineation and understanding of per- and poly-fluoroalkyl substances (PFAS), or any other contamination migrating from the Site. Analytical data previously provided to the DEQ in late June 2018 identified PFAS contamination across the entire Site (at various depths), and at the property boundaries at significant concentrations above the 70 parts per trillion (ppt) Part 201 Drinking Water Cleanup Criteria for perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA).
- b. The DEQ recently sampled two existing monitoring wells located in downtown Rockford. The two existing monitoring wells sampled are located approximately 1,175 feet south (downstream along the Rogue River) of the southernmost nested set of monitoring wells (MW-309 cluster) on the Site, which identified 50,000 ppt of PFOS in April 2018. The DEQ will share these results with Wolverine World Wide when they are received in order to help with the off-site characterization of PFAS in the surrounding area of the Site.

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2. Task 2 Comments:

- a. A minimum of 4 quarters of groundwater sampling events should be conducted to adequately evaluate the potential presence of PFAS in groundwater due to seasonal variations.
- b. The newly installed off-site monitoring wells should be added to the overall groundwater monitoring schedule until the plume is fully defined and the long-term fate and transport of the contamination is understood.

Once the laboratory data is received and compiled from this initial off-site groundwater investigation, the DEQ is requesting to have a meeting to discuss the results and recommend next steps for additional off-site work.

If you have any questions or concerns related to this request, please contact me at your earliest convenience at the Grand Rapids District Office at the contact information below.

Sincerely,



Abigail Hendershott
District Supervisor
Remediation and Redevelopment Division
Department of Environmental Quality
616-888-0528
HendershottA@michigan.gov

cc: Ms. Polly Synk, Department of Attorney General
Mr. Steve Sliver, PFAS Executive Lead, DEQ
Ms. Kathy Shirey, DEQ
Ms. Karen Vorce, DEQ