

**Summary of Public Comments
&
Department of Environment, Great Lakes, and Energy (EGLE) Responses
to
Wolverine World Wide's Draft Tannery Interceptor System Response Activity
Plan Addendum
Public Comment Period: December 12, 2022 – January 27, 2023
Document Date: March 29, 2023**

EGLE accepted public comments regarding Wolverine World Wide's Draft Tannery Interceptor System Response Activity Plan Addendum for the former Tannery Site located at 181 North Main Street NE, Rockford, Kent County, Michigan. Written comments were accepted between December 12, 2022, and January 27, 2023. The Response Activity Plan Addendum outlines the design of an interceptor system to address and control per- and polyfluoroalkyl substances (PFAS) contamination in groundwater before it enters the Rogue River at the Tannery site that Wolverine World Wide (Wolverine) is required to install as outlined in the February 19, 2020, Consent Decree between the State of Michigan, Algoma and Plainfield Townships, and Wolverine. Section 7.7 (Response Activities at the Tannery) of the Consent Decree lists the objectives and requirements of the interceptor system. The Addendum provides modifications to the EGLE-approved Tannery Interceptor System Response Activity Plan submitted March 31, 2022. Based on further modeling and on-site pump testing conducted by Wolverine in 2022, the proposed interceptor/extraction system design is being modified to consist of nine (9) shallow trenches, two (2) shallow extraction wells, and four (4) deep extraction wells. On January 10, 2023, EGLE held a virtual public meeting to discuss the Draft Tannery Interceptor System Response Activity Plan Addendum. A total of 230 written comments were received via email during the comment period. EGLE has reviewed all the comments provided and compiled them into categories below based on their subject. EGLE appreciates all of the citizens who took the time to provide comments or express their concerns.

TECHNICAL COMMENTS

1. Commenter: J.C. Anderson

Comment: Frankly, it still does not go far enough. If it were any other (i.e. financially smaller) company, they would be required to remove all contaminated soil from the sites entirely. That is what ought to happen here, and anything short of that will be an injustice to both the people of this state and to the environment. If it bankrupts them, so be it. That is the cost of doing business recklessly. We can not allow the established policies to be changed simply by one company's financial situation. They made this mess, they are obligated to clean it up, and to do so both promptly and properly, which means that the people can fish and boat in the water safely, so that the fish and other water dwellers can live healthily, in a timely manner. Not 20 years from now!

EGLE Response: Thank you for sharing your comments. The interceptor system is a requirement of the Consent Decree. Wolverine was required to complete time-critical actions at the Tannery which included removal of contaminated soils and buried leather scraps as part of the settlement agreement between United States Environmental Protection Agency (USEPA) and Wolverine. Additional information regarding these actions is available on the Michigan PFAS Action Response Team (MPART) website: <https://www.michigan.gov/pfasresponse/investigations/sites-aoi/kent-county/rockford-tannery> and the USEPA website: <https://www.epa.gov/mi/wolverine-world-wide-tannery>.

2. Commenter: Jonathan Miner

Comment: Hello,

I live on Main Street in Rockford, just north of the tannery property and adjacent to the former Sole Plant. I am surrounded by sites that need remediation and want to ensure that these sites are treated properly.

Regarding the Tannery:

1. I trust EGLE to stay on top of this project and to ensure that the remediation is effective and done in a timely manner.
2. The plan that ALL of the treated water will go into the Rogue River is news to me. With a flowrate of only 77gpm, I suspect the temperature of the treated water will not significantly warm the river and affect our cold-water fish, but I am curious about where and how the water will be discharged into the river. It should minimize erosion and not be an obvious unnatural jet of water. It should be invisible to turtles, ducks, fish and kayakers.
3. Since the treated water will not be going to the Plainfield water treatment facility, I worry that the content of the water (i.e. contaminant load) will not be monitored as well. There should be some check, other than the WWW company itself, ensuring the quality of the outflow.
4. There is, once again, no mention of restoring Rum Creek to a natural state. This is very important and it seems that the timing is right to combine this work with the installation of the interceptor system. The concrete chute is an eyesore and constant reminder of the pollution WWW has left there. A natural creek with shade trees would be much better for native wildlife and fish. It would also be safer for those strolling around the property once the fences are removed and be better at handling stormwater.
5. We have a goose problem on the tannery property now. WWW should take this opportunity to replace the turf grass (at least in a buffer zone along the trail) with prairie grasses that do not attract geese. There would be less maintenance (mowing) and it would benefit pollinators and help with stormwater management.

Thank you,

EGLE Response: Thank you for sharing your comments. The design of the outfall into the Rogue River will be reviewed upon submittal of the Lakes and Streams permit. The treated water will be analyzed in accordance with the National Pollutant Discharge Elimination System (NPDES) permit requirements prior to discharging to the Rogue River. EGLE will be collecting split samples of the treated water. The restoration of Rum Creek to a natural state and the replacement of the turf grass are not actions governed by Part 201; however, these comments have been passed onto Wolverine.

3. Commenter: Mike Russell

Comment: Dear Sir or Madame,

Please insist that Wolverine World Wide (WWW) focus more attention south of the WWW tannery site with testing, filtering and mitigation measures of the PFAS and heavy metals contamination. Clearly the voluminous available data indicates the southern contamination sites are much more concerning as a cleanup target. Respectfully,

EGLE Response: Thank you for sharing your comments. In January 2018, EGLE filed a legal complaint against Wolverine under the federal Resource Conservation and Recovery Act (RCRA) and state law, including Part 201 (Environmental Remediation) in the United States District Court for the Western District of Michigan. On February 19, 2020, EGLE and Plainfield and Algoma townships reached a settlement agreement with Wolverine through a Consent Decree which was approved by U.S. District Court Judge Janet T. Neff of the United States District Court for the Western District of Michigan. The Consent Decree became effective on February 19, 2020, and serves as the framework for all future response activities performed by Wolverine at the House Street property and surrounding area identified as the "North Kent Study Area". This Consent Decree required Wolverine to pay \$69.5 million to extend municipal water to approximately 1,000 homes; operate and maintain drinking water filters in the North Kent County Study Area where PFOA + PFOS concentrations exceed 10 ppt or other applicable criteria; continue residential drinking water well sampling to ensure the protection of public health; conduct groundwater investigations to monitor contamination in the area; investigate and address PFAS contamination entering surface waters; and undertake response activities at the House Street Disposal Site and Wolverine's Tannery to control these source areas. Wolverine will

conduct these activities under EGLE oversight, and the Consent Decree includes tools that ensure that the required work is completed. This Addendum was submitted only under Section 7.7 of the Consent Decree (Response Activities at the Tannery).

(For comment numbers 4 and 5, one response is provided after comment number 5)

4. Commenter: Andrew Hogan

Comment: Hello MI PFAS ART,

The addendum to the Tannery Interceptor System Response Activity Plan submitted by Rose & Westra on behalf of Wolverine World Wide falls short of serving the best interests of community members downstream of the Rockford dam on the Rogue & Grand rivers, and Rockford's & Plainfield's citizens directly impacted by PFAS contamination at the former Tannery Site. I've summarized a number of the inadequacies in the following bullet points:

- The interceptor system performance must be measured by changes to PFAS concentrations in groundwater on-Site. The surrogate method of measuring induced physical changes to the Site groundwater flow system falls short of protecting the health, safety and well-being of citizens.
- Rum Creek PFAS concentrations should be measured, directly, at least quarterly to confirm the interceptor system is meeting goals for reducing PFAS contamination.
- The location of the proposed passive trench needs to be adjusted. Too much PFAS contaminated soil exists between the riverbank and the proposed trench location for the remediation to be optimally effective.
- Further evidence needs to be provided to substantiate that the proposed trenches are deep enough to capture the pollution.
- More details are needed to substantiate that the system will be designed and monitored so that the migration of fine particles in the surrounding soil does not diminish the effectiveness of the trench system over its proposed operational lifetime.
- An improvement plan must be included in the event that extraction volumes of contaminated groundwater from the trench sump pumps steadily decline. Decline would be an indicator that fine particles are plugging up the trench system. Such a decline increases the probability of PFAS pollution entering the river, rather than being removed by the interceptor system.
- Groundwater elevation monitoring must be done weekly as originally proposed. Lapses in time greater than a week will not provide adequate data for assessing effectiveness of the system.
- The RAP addendum sheet 3 drawing shows too few piezometers at intermediate distances & regular intervals between the trench and the riverbank given the complicated soil structure. To ensure that the below-ground watercourse remains altered to optimally remediate the PFAS pollution, more data points need to be established at regular intervals.
- The monitoring wells identified in Table 8-1 of the Tannery Interceptor System RAP Addendum submitted December 1, 2022 must be sampled quarterly. Lapses in time greater than 3 months will not provide adequate data for assessing effectiveness of the system.
- The wells that previously exhibited highest levels contamination (TA-GW-01 and TMW-101) must be added to Table 8-1 and included in quarterly sampling data. Excluding results from these two wells will fail to provide adequate data for assessing effectiveness of the system.

5. Commenter: Kim Christner

Comment: I would like to express my public comment regarding the addendum to the Tannery Interceptor System Response Activity Plan submitted by Rose & Westra on behalf of Wolverine World Wide falls short of serving the best interests of community members downstream of the Rockford dam on the Rogue & Grand rivers, and Rockford's & Plainfield's citizens directly impacted by PFAS contamination at the former Tannery Site.

- The interceptor system performance must be measured by changes to PFAS concentrations in groundwater on-Site. The surrogate method of measuring induced physical changes to the Site

groundwater flow system is inadequate. The surrogate method falls short of protecting the health, safety and well-being of citizens.

- Rum Creek PFAS concentrations should be measured, directly, at least quarterly to confirm the interceptor system is meeting goals for reducing PFAS contamination.
- The location of the proposed passive trench needs to be brought closer to high concentrations of PFAS contamination near the riverbank. Too much PFAS contaminated soil exists between the riverbank and the proposed trench location for the remediation to be optimally effective.
- Further evidence needs to be provided to substantiate that the proposed trenches are deep enough to capture the vertical extent of the pollution.
- More details need to be provided to substantiate that the system is designed and monitored so that the migration of fine particles in the surrounding soil does not diminish the effectiveness of the trench system over its proposed operation lifetime.
- An improvement plan must be included in the event that extraction volumes of contaminated groundwater from the trench sump pumps steadily decline.
- Groundwater elevation monitoring must be done weekly as originally proposed. Lapses in time greater than a week will not provide adequate data for assessing effectiveness of the system.
- The monitoring wells identified in Table 8-1 of the Tannery Interceptor System RAP Addendum submitted December 1, 2022 must be sampled quarterly. Lapses in time greater than 3 months will not provide adequate data for assessing effectiveness of the system.
- The wells that previously exhibited highest levels contamination (TA-GW-01 and TMW-101) must be added to Table 8-1 and included in quarterly sampling data. Excluding results from these two wells will fail to provide adequate data for assessing effectiveness of the system

EGLE Response: Thank you for sharing your comments. EGLE shares some similar concerns as you have outlined in your comments. EGLE is requesting Wolverine provide justification for the location of the trench; however, please note that locating the trench too close to the river will pull in river water and increase system maintenance. EGLE is also requesting a sampling plan for areas where PFAS concentrations would be expected to decrease and/or stabilize. EGLE also has concerns about the ongoing maintenance of the trenches and has requested that an operations and maintenance (O&M) plan be included as part of the submittal. EGLE's full response can be seen in our attached March 10, 2023, response letter to Wolverine.

6. Commenter: Thomas Sapkowski

Comment: EGLE – and anyone who believes clean water is important

Wolverine's latest plan to address PFOS contamination into the Rogue River is garbage. It is packed with a bunch of unproven remedies and half measures. Their so-called interceptor plan may have an incremental effect on improving PFOS levels, but they won't even test the surface water in the Rogue River or Rum Creek to prove their "system" is effective.

If their system is so wonderful why all the delays in implementation? They could have at the very least dug up the most contaminated areas – right at the river's edge, and removed it to be safely stored or incinerated.

Are they waiting for the EPA to certify PFOS as a hazardous substance, thereby bringing Superfund into the picture? I don't get it. Wolverine has already blown past the deadlines set forth in the consent decree and has faced no real consequences. Please do something, and in an expeditious manner. My neighbors and I live in the contamination zone near the House Street dump and we are completely fed up with the foot dragging by Wolverine and the lack of consequences being enforced by EGLE.

This continual poisoning of our watershed has to be stopped or at the very least slowed down. Every big rain event only exacerbates an already dire situation. Wolverine is proposing just five piezometers to cover 1000 feet of shoreline to monitor groundwater levels to determine if they can draw down the water table and test the efficiency of their pumps. The real test is whether or not they are improving PFOS levels in the creek and river and this does not seem to be an immanent concern.

Who is going to stand up once and for all at the State level and say enough is enough? Please require appropriate on-site testing and no further delays.

I hope this provides a window into the concerns of the residents of this area. Why is it too much to ask that the state with the most freshwater in the nation do everything in its' power to keep it clean?

EGLE Response: Thank you for sharing your comments. EGLE shares your concern about the number of piezometers proposed as part of the performance monitoring plan. EGLE's full response can be seen in our attached March 10, 2023, response letter to Wolverine.

(For comment numbers 7 and 8, one response is provided after comment number 8)

7. Commenter: Carol Butts, MPH

Comment: To Whom It May Concern,

Thank you for the opportunity to comment on Draft Tannery Interceptor System Response Activity Plan. I am a Rockford Resident of 20 years, member of the Wolverine Community Advisory Group, a Master of Public Health 2019 graduate, with a bachelor's degree in biomedical sciences. I am deeply concerned about the ongoing Public Health threat from downstream effects of the PFAS found in the Rockford Tannery site groundwater.

As detailed by Dr. Rick Rediske, an environmental science professor who serves on our CAG Technical committee the following list of concerns make multiple valid points with review recommendations to the proposed plan:

We recommend that the Draft Tannery Interceptor Response Activity Plan Addendum submitted on December 1, 2022, by Wolverine Worldwide (WW) be rejected based on the following concerns:

1. EGLE/Contractors need to conduct a thorough technical review of the trench design to determine if the distance to the Rogue and the depth are sufficient to stop the flow of contaminated groundwater and if it will lose effectiveness due to plugging. We are concerned about the separation distance between the trench and Rogue and the fact that the trench is much closer to Rum Creek.
2. The frequency of the water elevation monitoring program should remain weekly as described in the original plan and not changed to monthly. There should be more piezometer arrays to account for the site complexity of site soils and water elevation variability in the Rogue River.
3. The PFAS groundwater monitoring should be monthly instead of annual. The wells with the highest PFAS levels near the Rogue River also should be included.
4. PFAS monitoring in Rum Creek should be included to accurately verify that contamination is not entering the creek. Water level measurements at a single point on either side do not provide direct confirmation.
5. We are concerned that WW admits in the plan that their treatment system will not reduce the contamination levels in the monitoring wells or the pore water in the receiving stream during the two-year performance monitoring period. If this is the case, WW must provide a method to determine directly that contaminated groundwater is not venting into the receiving water by directly measuring PFAS concentrations.
6. A detailed description of the treatment system and a complete timeline must be included in the plan.
7. The recreational use of the Rogue River continues to be impacted by PFAS foam and fish consumption advisories for the Tannery area and the impoundment in Rockford. WW must prove with direct measurement data of PFAS concentrations that their proposed system is stopping the flow of PFAS to the Rogue River as required by the Consent Decree.

If the Tannery Interceptor System Response Activity Plan is approved, PFAS pollution is sure to run south of the site with the Rogue River into the Grand River which provides water to disadvantaged populations and food for a widespread ecosystem of wildlife and food chain. We must act as stewards now to ensure the proposed trenches have a realistic depth to capture pollution as well as have more effective working monitoring and filtration interventions in place to ensure widespread contamination ceases before entering the river.

Regards,

8. Commenters: Tobyn and Seth McNaughton

Comment: To Whom it May Concern:

I am asking you today and everyday to hold Wolverine World Wide accountable for the pollution they have caused. They continue to exacerbate the situation because of their inaction. Any action they have taken has been sub-par and really a slap in the face to this community. They need their hands forced to do what is right, other wise they just sit on them.

We recommend that the Draft Tannery Interceptor Response Activity Plan Addendum submitted on December 1, 2022, by Wolverine Worldwide (WW) be rejected based on the following concerns:

EGLE/Contractors need to conduct a thorough technical review of the trench design to determine if the distance to the Rogue and the depth are sufficient to stop the flow of contaminated groundwater and if it will lose effectiveness due to plugging. We are concerned about the separation distance between the trench and Rogue and the fact that the trench is much closer to Rum Creek.

The frequency of the water elevation monitoring program should remain weekly as described in the original plan and not changed to monthly. There should be more piezometer arrays to account for the site complexity of site soils and water elevation variability in the Rogue River.

The PFAS groundwater monitoring should be monthly instead of annual. The wells with the highest PFAS levels near the Rogue River also should be included.

PFAS monitoring in Rum Creek should be included to accurately verify that contamination is not entering the creek.

Water level measurements at a single point on either side do not provide direct confirmation.

We are concerned that WW admits in the plan that their treatment system will not reduce the contamination levels in the monitoring wells or the pore water in the receiving stream during the two year performance monitoring period. If this is the case, WW must provide a method to determine directly that contaminated groundwater is not venting into the receiving water by directly measuring PFAS concentrations.

A detailed description of the treatment system and a complete timeline must be included in the plan.

The recreational use of the Rogue River continues to be impacted by PFAS foam and fish consumption advisories for the Tannery area and the impoundment in Rockford. WW must prove with direct measurement data of PFAS concentrations that their proposed system is stopping the flow of PFAS to the Rogue River as required by the Consent Decree.

Please reject their current plan, have them make the adjustments suggested, and help them do the right thing. Thank you,

EGLE Response: Thank you for sharing your comments. EGLE shares some similar concerns as you have outlined in your comments. EGLE is requesting Wolverine provide justification for the location of the trench; however, please note that locating the trench too close to the river will pull in river water and increase system maintenance. EGLE also has concerns about the ongoing maintenance of the trenches and has requested that an operations and maintenance (O&M) plan be included as part of the submittal. EGLE's full response can be seen in our attached March 10, 2023, response letter to Wolverine.

(For comment numbers 9 and 10, one response is provided after comment number 10)

9. Commenter: Elaine Sterrett Isely on behalf of West Michigan Environmental Action Council (WMEAC)

Comment: Dear Ms. Gies,

West Michigan Environmental Action Council (WMEAC) has been West Michigan's preeminent resource for environmental education and advocacy since 1968. Founded by a diverse group of concerned citizens and organizational stakeholders, WMEAC is a non-profit, 501c3 organization uniquely positioned to respond to emerging issues and new threats to West Michigan's natural and human ecologies, strategically focused on building sustainable communities and protecting water resources.

WMEAC has been engaged with the citizens' group in Rockford regarding the Wolverine Worldwide tannery tear-down and contamination sites since 2012. Since 2017, we helped raise the alarm about PFAS contamination associated with the additional contamination sites at House Street, Wolven-Jewell, and the Sole Plant. I am a member of the Wolverine Community Advisory Group (CAG), and WMEAC shares the CAG's

concerns regarding Wolverine's Revised Tannery Interceptor Response Plan, submitted to EGLE on December 1, 2022.

Specifically, WMEAC shares the CAG's concerns, and adopted their comment based on two sections in the Consent Decree:

1. The Response Activity Plan shall contain a schedule for any interceptor system modifications or expansion(s) and an appropriate groundwater monitoring plan to demonstrate the effectiveness of the interceptor system.
2. [Wolverine] shall demonstrate that the interceptor system is effective at addressing PFAS Compounds contamination and preventing PFAS Compounds from entering the surface water above water quality standards issued under Part 31.

The proposed revisions deviate further from achieving the goal of providing evidence of compliance with data based on PFAS concentrations. Wolverine makes two statements that are the basis for our concern:

1. Page 24. "it is important to emphasize the interceptor system performance will not be measured by changes to PFAS concentrations in groundwater on-Site, but rather, the induced physical changes to the Site groundwater flow system."
2. Page 26. "the hydraulic gradient between the Rogue River or Rum Creek and the extraction system will generally be small and groundwater velocity low resulting in few pore-water volume changes in years. It is unlikely that the constituent concentrations in the monitoring wells/piezometers will exhibit noticeable decreases in the short term; therefore, the annual sampling frequency is proposed in the long term."

These statements show that Wolverine's monitoring program will not rely on direct PFAS measurements to confirm compliance but rely on groundwater elevations as a theoretical surrogate.

The revised plan eliminates the purge well design and the pumping and treating of 7 GPM to be discharged to the North Kent Sewer Authority early in 2023. The revised plan also changes the remediation program to installing a passive trench that follows the discontinued line of purge wells along the Rogue River and Rum Creek. The remediation was switched to the passive trench system due to the heterogeneity of the soils and strata on the site. While, in theory, the passive trench system can be implemented to completely capture the plumes of contaminated groundwater entering the two surface water streams, we request that EGLE and their contractors thoroughly review the calculations, models, and design specifications to confirm that the following:

- The trenches are located at the proper distance to Rogue River and Rum Creek so that the contaminated groundwater is completely intercepted and the high levels of PFAS along the shoreline do not leach into the receiving waters.
- The trenches are deep enough to capture the vertical extent of the pollution.
- The system is designed and monitored so that the migration of the fine particles in the surrounding soil strata does not pass into the trenches and reduce their ability to capture contaminated groundwater. These trenches will be in operation for many years, and the extraction volumes in the sumps must be monitored for flow changes due to plugging.

We are especially concerned that the trench system is located 70-130 feet from the Rogue River and that the highest levels are near the shoreline. The trench system is much closer to Rum Creek than the Rogue River and will receive far less groundwater at a shallower depth. Wolverine did not justify why the trench was closer to Rum Creek for most of the shoreline perimeter than the trench system proposed along the Rogue River.

Wolverine purports that the complexity and heterogeneity of the stratigraphy are such that a continuous passive trench system should replace the purge system to capture the site groundwater effectively. While we agree that the stratigraphy is complex, Wolverine proposes only five sets of paired piezometers to characterize over 1500 feet of highly variable stratigraphy along the Rogue River. Their contractor provided no evidence based justification that their monitoring system is representative of site stratigraphy. They also propose to cut back the

groundwater elevation monitoring from weekly in the approved plan (page 39; 3/31/22) to monthly in the proposed plan (page 24). River piezometer monitoring is further complicated by the fact that the piezometers are located 70-130 feet from the trench system, and the historical groundwater levels and river stages can vary over 2 feet. Since Wolverine is requesting to change the design due to the complexity of the soil profiles at the site, the piezometer arrays also should account for this variability. Wolverine provided no evidence that the 5 locations would be presentative of 1000 ft of shoreline with variable stratigraphy.

Wolverine's statement on page 26 about low hydraulic gradients resulting in "few exchanges of pore water over years" is misleading. PFAS transport will still occur by diffusion from high to low concentration gradients (site to the surface water) and from low permeability soils to the permeable gravels and sands in the stream (Fetter et. al. 2017. Contaminant Hydrogeology. 3rd ed., Waveland Press 2017). Flowing water (especially during high flow events) and burrowing organisms will also enhance contaminant diffusion. Due to site heterogeneity impacting the representativeness of the piezometers and issues with the conclusions about pore water and the inherent uncertainty associated with water elevation measurements, the only way to verify that the passive trench is preventing PFAS from reaching surface water is to conduct sampling of the affected streams.

Since there is a two year window in the Consent Decree to assess the effectiveness of the remediation system, WMEAC requests that all wells identified in Table 8-1 be monitored quarterly. We also request that the wells with the highest concentrations of PFOS (TA-GW-01 and TMW-101) be added to the monitoring program as they are close to the Rogue River and need to have the associated groundwater intercepted by the trench system. A majority of the performance monitoring wells were listed to be monitored annually, which will only yield two data points to evaluate the effectiveness of the extraction/treatment system. It is also appropriate to look at the multiple data points collected after two years and decide if some wells should be monitored quarterly or annually. WMEAC also recommends that the monitoring of piezometer arrays used for water elevation measurements be automated by pressure transducers that can continuously record and transmit water level data.

WMEAC shares the CAG's belief that the most direct way to demonstrate compliance with the requirement to "control PFAS compounds contamination in groundwater at the Tannery before it enters the Rogue River" is to sample the Rogue River upstream and downstream of the Tannery for PFAS compounds and with discharge data, to calculate the loading of PFAS compounds above and below the Tannery. While this assessment may be part of a future Natural Resources Damages Assessment, we highly recommend that Rum Creek be sampled quarterly as part of the site monitoring program. Rum Creek can be easily sampled without special equipment and contained 50 ppt PFOS on October 23, 2018. PFAS is moving into Rum Creek from the venting of contaminated groundwater at the Tannery and monitoring the creek will provide direct evidence of stopping groundwater flow over a considerable distance. A single piezometer array on each side of Rum Creek will not provide direct confirmation of groundwater interception in a stream with complex stratigraphy. The recreational use of the Rogue River continues to be impacted by PFAS foam and PFAS fish consumption advisories for the Tannery area and the impoundment in Rockford. The verified control of the PFAS plume from the WW Tannery is a critical part of restoring these damages to the natural resources provided by the Rogue River, especially since the change to the trench system will result in an additional eight months of additional impairment to our natural resources due to the uncontrolled venting of PFAS contaminated groundwater.

WMEAC also adopts the CAG's recommendation that Rum Creek be returned to its natural state and that the cement culvert enclosing the creek be removed while the equipment is available and the trench system is being installed. Restoring the creek to a natural state will remove an eyesore and constant reminder of the contamination and improve fish passage, stormwater management, and habitat. Once the interceptor system is installed, there will be no opportunity to return Rum Creek to a pleasing, healthy, and natural state for decades.

Wolverine provides no details about the treatment system design and a Gantt Chart Timeline in the revised plan. WMEAC requests that plan be revised to include both elements with more information similar to Appendix C and D in the approved plan. The Notice of Violation Wolverine received was based on needing to meet the details in the previous timeline. The new timeline should include trackable milestones with monthly reporting of progress

to EGLE. The modular and final system should be enclosed in a building that goes through Planning Commission approval and is constructed with the appropriate architecture and materials for a setting with high visibility.

In conclusion, the PFAS contamination at the Wolverine Tannery must be managed to significantly reduce the documented flow of PFAS contaminated groundwater into the surface waters of the Rogue River and Rum Creek. The additional groundwater monitoring wells and surface water sampling will be essential to demonstrate that the revised Tannery Interceptor System meets the goals as previously outlined in the Consent Decree.

10. Richard R. Rediske, Ph.D., on behalf of the Wolverine CAG

Comment: The Wolverine Community Advisory Group (WCAG) is comprised of concerned citizens that have been impacted by PFAS contamination from the Wolverine Worldwide (WW) Tannery in Rockford and their waste disposal sites in northern Kent County. The contaminated area covers approximately 25 square miles, and PFAS compounds have been detected in 800+ residential wells and the Plainfield Township municipal water supply, which serves over 40,000 people. The WCAG is responding to the Revised Draft Tannery Interceptor System Response Activity Plan by WW, submitted to EGLE on December 1, 2022.

Our concerns are based on two sections in the Consent Decree:

1. The Response Activity Plan shall contain a schedule for any interceptor system modifications or expansion(s) and an appropriate groundwater monitoring plan to demonstrate the effectiveness of the interceptor system.
2. Defendant shall demonstrate that the interceptor system is effective at addressing PFAS Compounds contamination and preventing PFAS Compounds from entering the surface water above water quality standards issued under Part 31.

The WCAG outlined our concerns about meeting these requirements in our 1/22/22 comment letter. The proposed revisions deviate further from achieving the goal of providing evidence of compliance with data based on PFAS concentrations. WW makes two statements that are the basis for our concern:

1. Page 24. "it is important to emphasize the interceptor system performance will not be measured by changes to PFAS concentrations in groundwater on-Site, but rather, the induced physical changes to the Site groundwater flow system."
2. Page 26. "the hydraulic gradient between the Rogue River or Rum Creek and the extraction system will generally be small and groundwater velocity low resulting in few pore-water volume changes in years. It is unlikely that the constituent concentrations in the monitoring wells/piezometers will exhibit noticeable decreases in the short term; therefore, the annual sampling frequency is proposed in the long term."

These statements show that WW's monitoring program will not rely on direct PFAS measurements to confirm compliance but rely on groundwater elevations as a theoretical surrogate.

The revised plan eliminates the purge well design and the pumping and treating of 7 GPM to be discharged to the North Kent Sewer Authority early in 2023. The revised plan also changes the remediation program to installing a passive trench that follows the discontinued line of purge wells along the Rogue River and Rum Creek. The remediation was switched to the passive trench system due to the heterogeneity of the soils and strata on the site. While, in theory, the passive trench system can be implemented to completely capture the plumes of contaminated groundwater entering the two surface water streams, we request that EGLE and their contractors thoroughly review the calculations, models, and design specifications to confirm that the following:

- The trenches are located at the proper distance to Rogue River and Rum Creek so that the contaminated groundwater is completely intercepted and the high levels of PFAS along the shoreline do not leach into the receiving waters.
- The trenches are deep enough to capture the vertical extent of the pollution.
- The system is designed and monitored so that the migration of the fine particles in the surrounding soil strata does not pass into the trenches and reduce their ability to capture contaminated groundwater. These trenches will be in operation for many years, and the extraction volumes in the sumps must be monitored for flow changes due to plugging.

We are especially concerned that the trench system is located 70-130 ft from the Rogue River and that the highest levels are near the shoreline (Figure 1). The trench system is much closer to Rum Creek than the

Rogue River and will receive far less groundwater at a shallower depth. WW did not justify why the trench was closer to Rum Creek for most of the shoreline perimeter than the trench system proposed along the Rogue River.

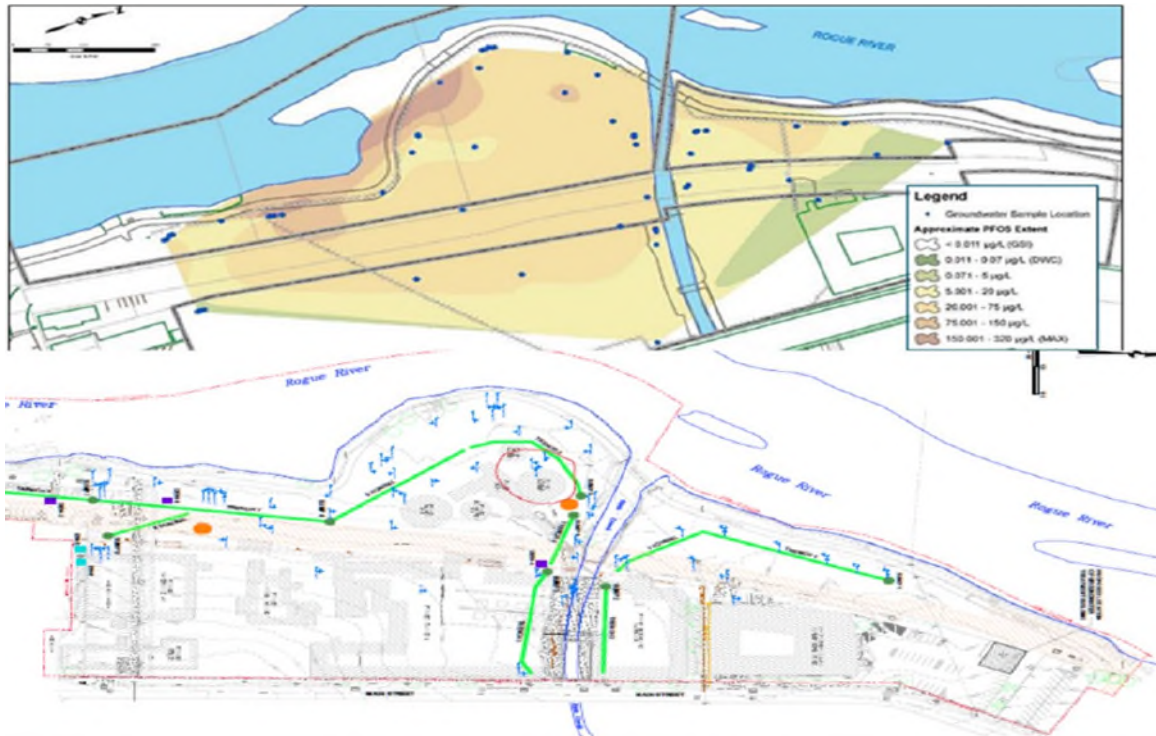


Figure 1. PFAS Contamination Map and Proposed Recovery System.

WW purports that the complexity and heterogeneity of the stratigraphy are such that a continuous passive trench system should replace the purge system to capture the site groundwater effectively. While we agree that the stratigraphy is complex, WW proposes only five sets of paired piezometers to characterize over 1500 ft of highly variable stratigraphy along the Rogue River (Figure 2). GZA provided no evidence based justification that their monitoring system is representative of site stratigraphy. They also propose to cut back the groundwater elevation

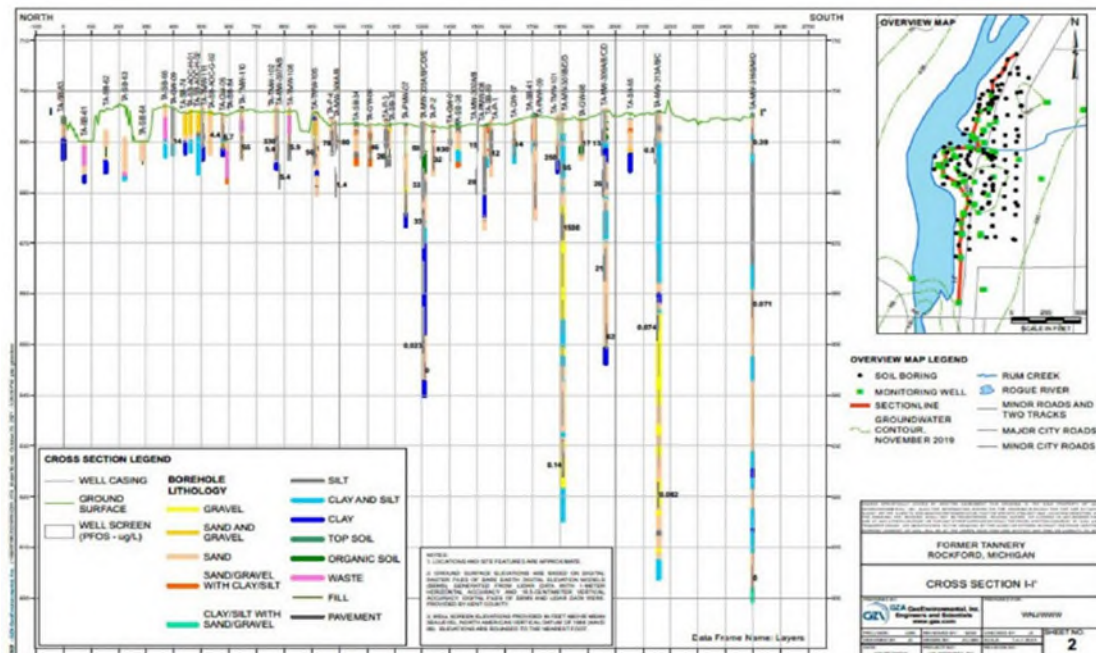
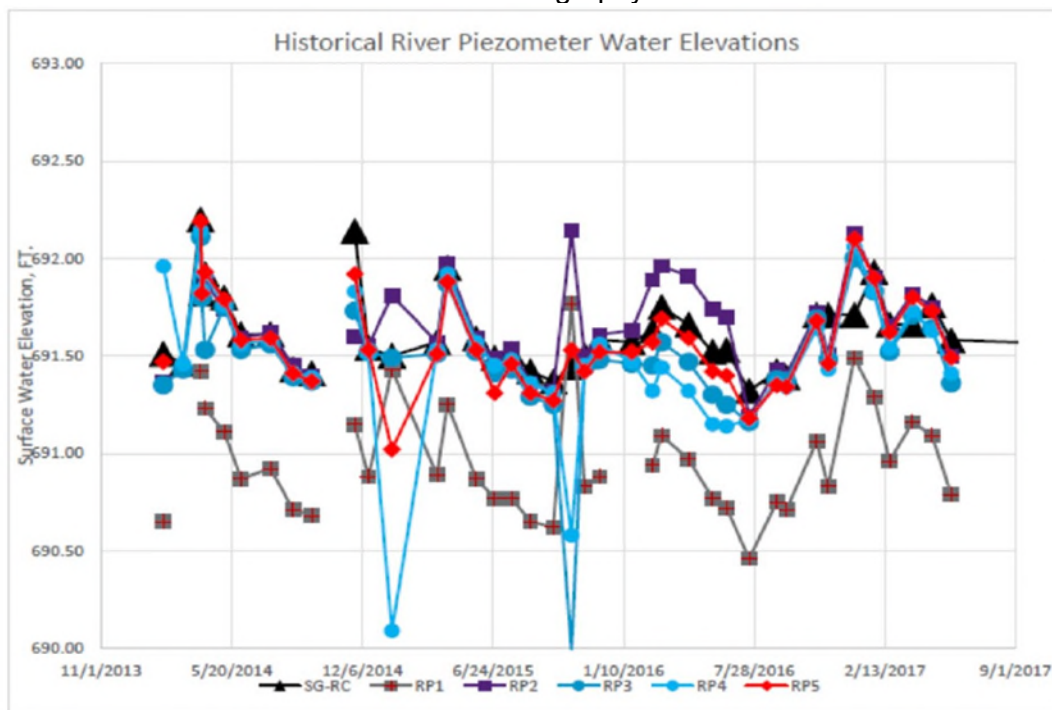




Figure 2. Site Stratigraphy and Proposed Piezometer Arrays for Groundwater Elevation Monitoring

monitoring from weekly in the approved plan (page 39; 3/31/22) to monthly in the proposed plan (page 24). River piezometer monitoring is further complicated by the fact that the piezometers are located 70-130 ft from the trench system, and the historical groundwater levels and river stages can vary over 2 ft (Figure 3). Since WW is requesting to change the design due to the complexity of the soil profiles at the site, the piezometer arrays also should account for this variability. WW provided no evidence that the 5 locations would be representative of 1000 ft of shoreline with variable stratigraphy.



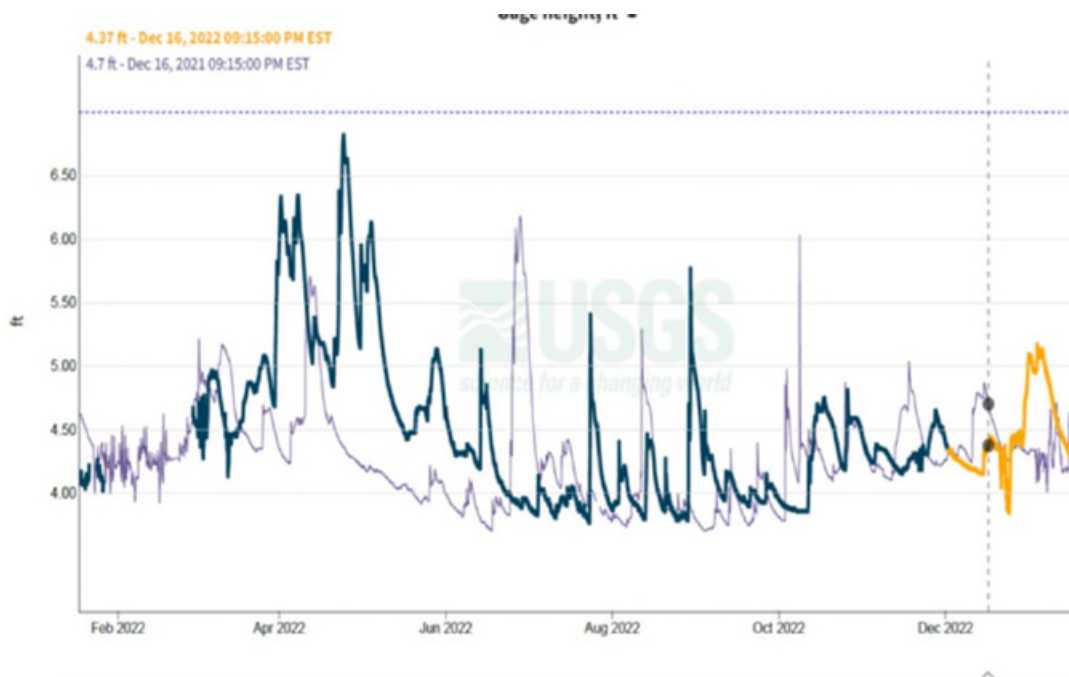
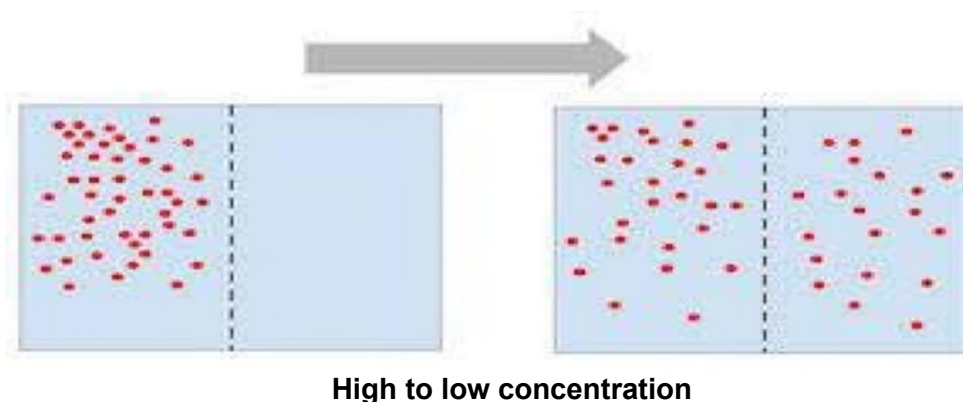


Figure 3. Variability of Piezometer Water Elevations (GZA) and Rogue River Stage (USGS).

WW's statement on page 26 about low hydraulic gradients resulting in "few exchanges of pore water over years" is misleading. PFAS transport will still occur by diffusion from high to low concentration gradients (site to the surface water) and from low permeability soils to the permeable gravels and sands in the stream (Fetter et al. 2017). Flowing water (especially during high flow events) and burrowing organisms will also enhance contaminant diffusion. Due to site heterogeneity impacting the representativeness of the piezometers and issues with the conclusions about pore water and the inherent uncertainty associated with water elevation measurements (Figure 4), the only way to verify that the passive trench is preventing PFAS from reaching surface water is to conduct sampling of the affected streams.



High PFAS Levels are in this Zone.

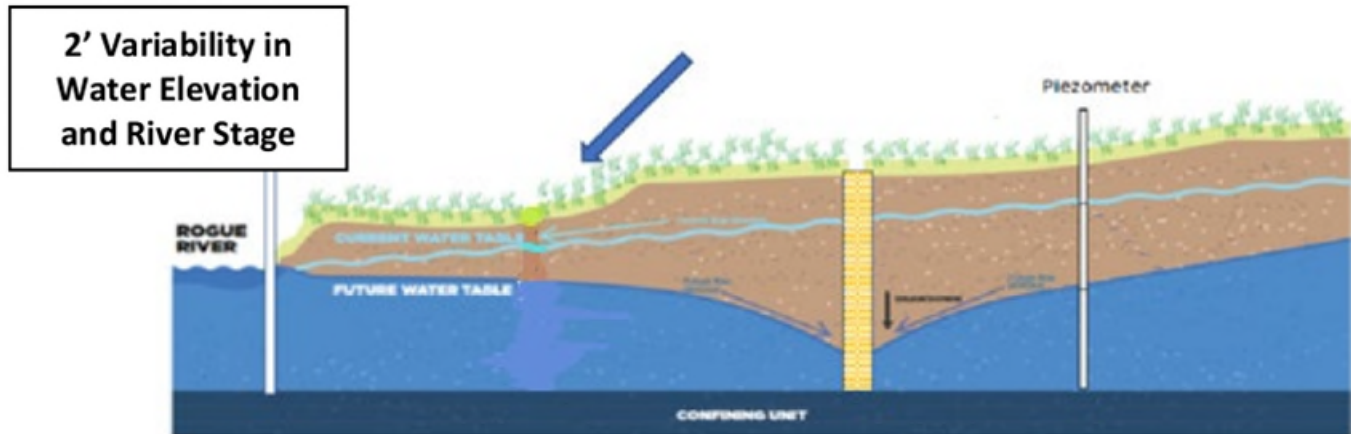


Figure 4. The Influence of Diffusion, River Stage, and Water Elevation on Piezometer Values.

Since there is a two year window in the Consent Decree to assess the effectiveness of the remediation system, we request that all wells identified in Table 8-1 be monitored quarterly. We also request that the wells with the highest concentrations of PFOS (TA-GW-01 and TMW-101) be added to the monitoring program as they are close to the Rogue River and need to have the associated groundwater intercepted by the trench system. A majority of the performance monitoring wells were listed to be monitored annually, which will only yield two data points to evaluate the effectiveness of the extraction/treatment system. It is also appropriate to look at the multiple data points collected after two years and decide if some wells should be monitored quarterly or annually. We also recommend that the monitoring of piezometer arrays used for water elevation measurements be automated by pressure transducers that can continuously record and transmit water level data.

We still believe that the most direct way to demonstrate compliance with the requirement to “control PFAS compounds contamination in groundwater at the Tannery before it enters the Rogue River” is to sample the Rogue River upstream and downstream of the Tannery for PFAS compounds and with discharge data, to calculate the loading of PFAS compounds above and below the Tannery. While this assessment may be part of a future Natural Resources Damages Assessment, we highly recommend that Rum Creek be sampled quarterly as part of the site monitoring program. Rum Creek can be easily sampled without special equipment and contained 50 ppt PFOS on 10/23/18. PFAS is moving into Rum Creek from the venting of contaminated groundwater at the Tannery. Monitoring the creek will provide direct evidence of stopping groundwater flow over a considerable distance. A single piezometer array on each side of Rum creek will not provide direct confirmation of groundwater interception in a stream with complex stratigraphy. The recreational use of the Rogue River continues to be impacted by PFAS foam and PFAS fish consumption advisories for the Tannery area and the impoundment in Rockford. The verified control of the PFAS plume from the WW Tannery is a critical part of restoring these damages to the natural resources provided by the Rogue River, especially since the change to the trench system will result in an additional eight months of additional impairment to our natural resources due to the uncontrolled venting of PFAS contaminated groundwater.

We also recommend that Rum Creek be returned to its natural state and that the cement culvert enclosing the creek be removed while the equipment is available and the trench system is being installed. Restoring the creek to a natural state will remove an eyesore and constant reminder of the contamination and improve fish passage, stormwater management, and habitat. Once the interceptor system is installed, there will be no opportunity to return Rum Creek to a pleasing, healthy, and natural state for decades.

WW provided no details about the treatment system design and a Gantt Chart Timeline in the revised plan. We request that plan be revised to include both elements with more information similar to Appendix C and D in the approved plan. The Notice of Violation WW received was based on needing to meet the details in the previous

timeline. The new timeline should include trackable milestones with monthly reporting of progress to EGLE. The modular and final system should be enclosed in a building that goes through Planning Commission approval and is constructed with the appropriate architecture and materials for a setting with high visibility.

Conclusions

The Wolverine Community Advisory Group appreciates the opportunity to comment on the Revised Draft Tannery Interceptor System Response Activity Plan. The PFAS contamination at the WW Tannery must be managed to significantly reduce the documented flow of PFAS contaminated groundwater into the surface waters of the Rogue River and Rum Creek. The additional groundwater monitoring wells and surface water sampling will be essential to demonstrate that the revised Tannery Interceptor System meets the goals outlined in the CD.

Sincerely,

Richard R. Rediske, Ph.D.

Leadership Team

Wolverine Community Advisory Group

EGLE Response: Thank you for sharing your comments. EGLE shares similar concerns regarding the location and depth of the proposed trenches, the operation and maintenance of the trenches, the number of piezometers, and the changes in monitoring schedule from the approved March 31, 2022, Response Activity Plan. EGLE is requesting Wolverine provide justification for the location of the trench; however, please note that locating the trench too close to the river will pull in river water and increase system maintenance. The restoration of Rum Creek to a natural state is not an action governed by Part 201; however, this comment has been passed onto Wolverine. EGLE's full response can be seen in our attached March 10, 2023, response letter to Wolverine.

11. Commenter: Sandy Wynn-Stelt

Comment: As a member of the Wolverine CAG, and a citizen of Belmont, I have reviewed the Tannery Interceptor Plan that was submitted and listened to comments and presentations. I would like to explain my concerns, though keep in mind that I have no formal training in geology. But sadly, I do understand the impacts of PFAS contamination, as well as others on the CAG.

1. The timeline continues to be unacceptable. There continues to be stalling and delays. While this occurs contamination continues to flow into the Rogue River which flows to Grand Rapids, and eventually out to Lake Michigan.
2. I would also ask that more monitoring occur than what is outlined in the plan. There appears to be little monitoring, and at low frequency (yearly) which means that if the trench system does not work, this could take years to be found and corrected.
3. In that same light, I would suggest that more monitoring wells be in place. Again, the more data that is collected, the quicker and more comprehensive the response.
4. There is also concern that the trench system as outlined. While I will be the first to admit that I barely understand this, I would hope that the placement occurs to maximize the capture of contamination. I realize that there is concern about disrupting the White Pine Trail for a brief period, however that is minor compared to the disruption to people and wildlife down river.
5. It will also be important to address the issue of Rum Creek since it is a source of contamination and others have described it as an eyesore. Since work is being done, a good corporate citizen would want to take care of this as a show of good faith to the community.

We have all seen the latest news about the effects of PFAS in fish and wildlife. This underscores the urgency in doing this project correctly, and not just what would be considered the minimal amount of care.

EGLE Response: Thank you for sharing your comments. EGLE shares similar concerns regarding the location and depth of the proposed trenches, the number of piezometers, and the changes in monitoring schedule from the approved March 31, 2022, Response Activity Plan. EGLE is requesting Wolverine provide justification for the location of the trench; however, please note that locating the trench too close to the river will

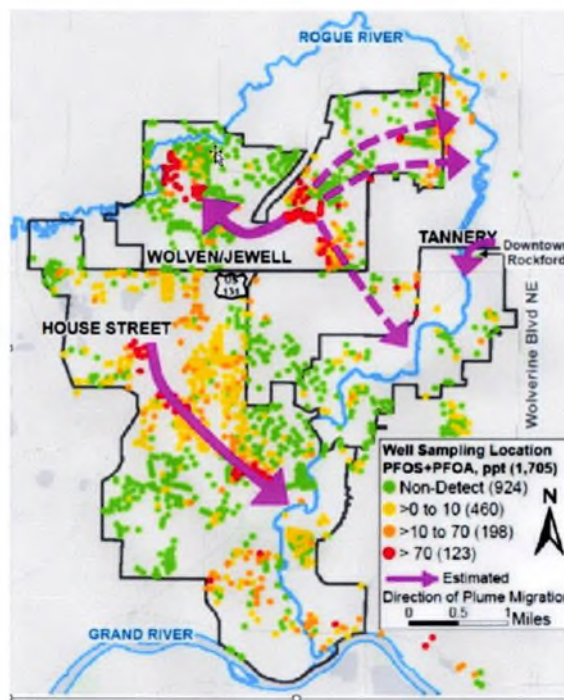
pull in river water and increase system maintenance. The restoration of Rum Creek to a natural state is not an action governed by Part 201; however, this comment has been passed onto Wolverine. EGLE's full response can be seen in our attached March 10, 2023, response letter to Wolverine.

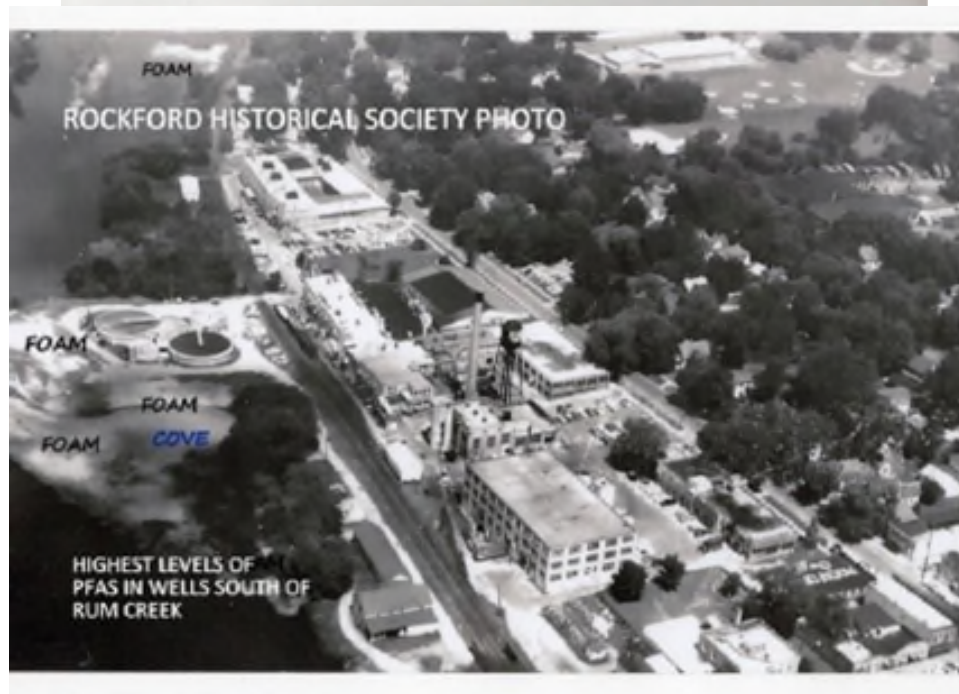
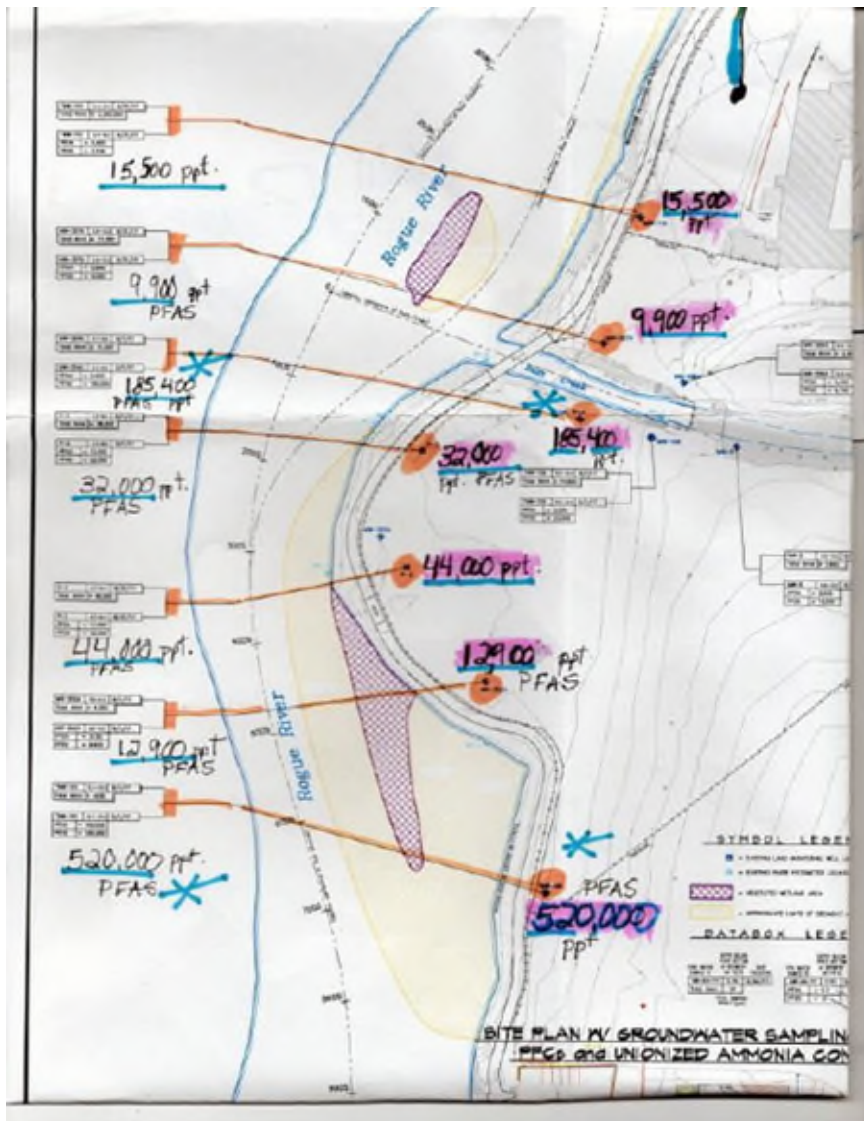
12. Commenter: Lynn M. McIntosh

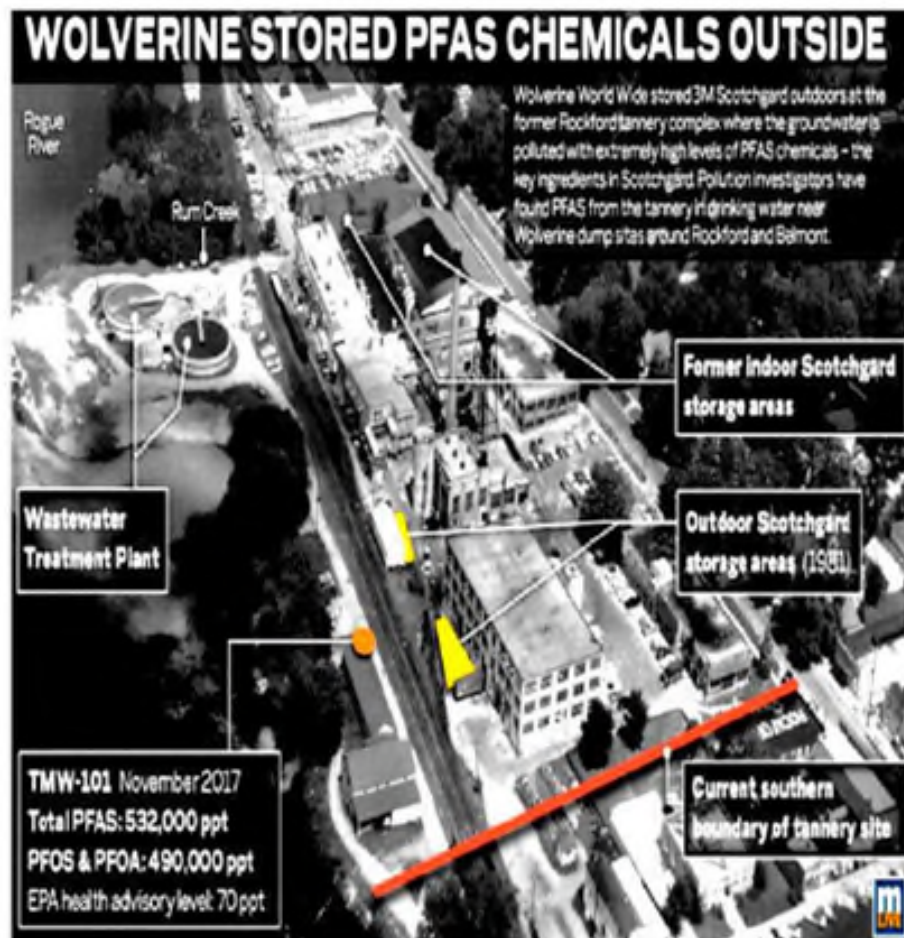
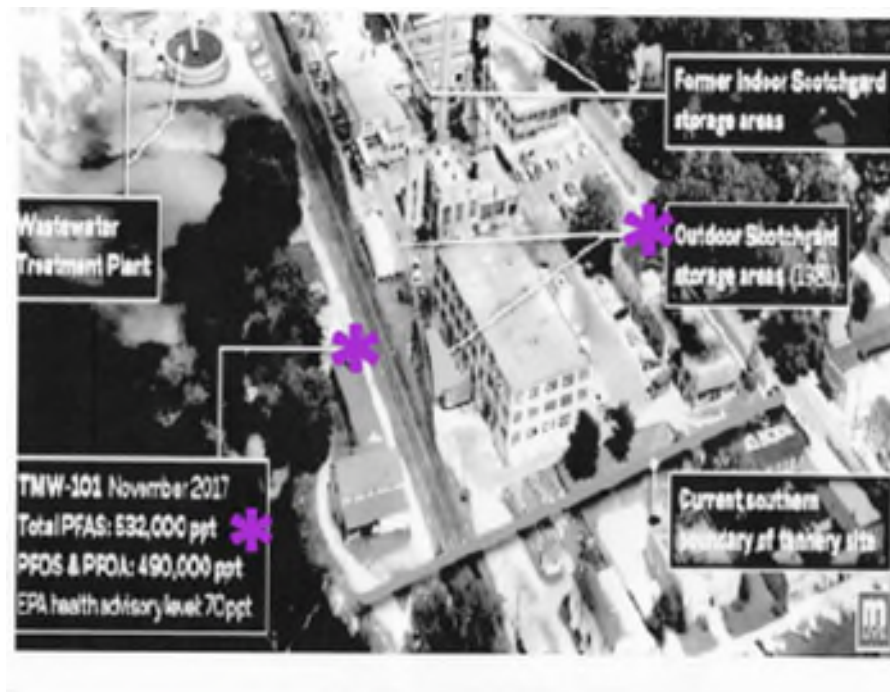
Comment: Please include the attached Photo/Map Album as part of my public comment. I am responding to the Revised Draft Tannery Interceptor System Response Activity Plan by WW, submitted to EGLE on December 1, 2022.

KEY MAPS/VISUALS

Follow the FOAM: PFAS on the Rogue River west of WW Tannery and southwest of WW Sole Plant: 2011-2023







An MLive infographic shows where 3M Scotchgard was stored at the former tannery

POST DEMOLITION 2012: Aerial view of former Wolverine Worldwide Tannery site showing areas near Rum Creek.

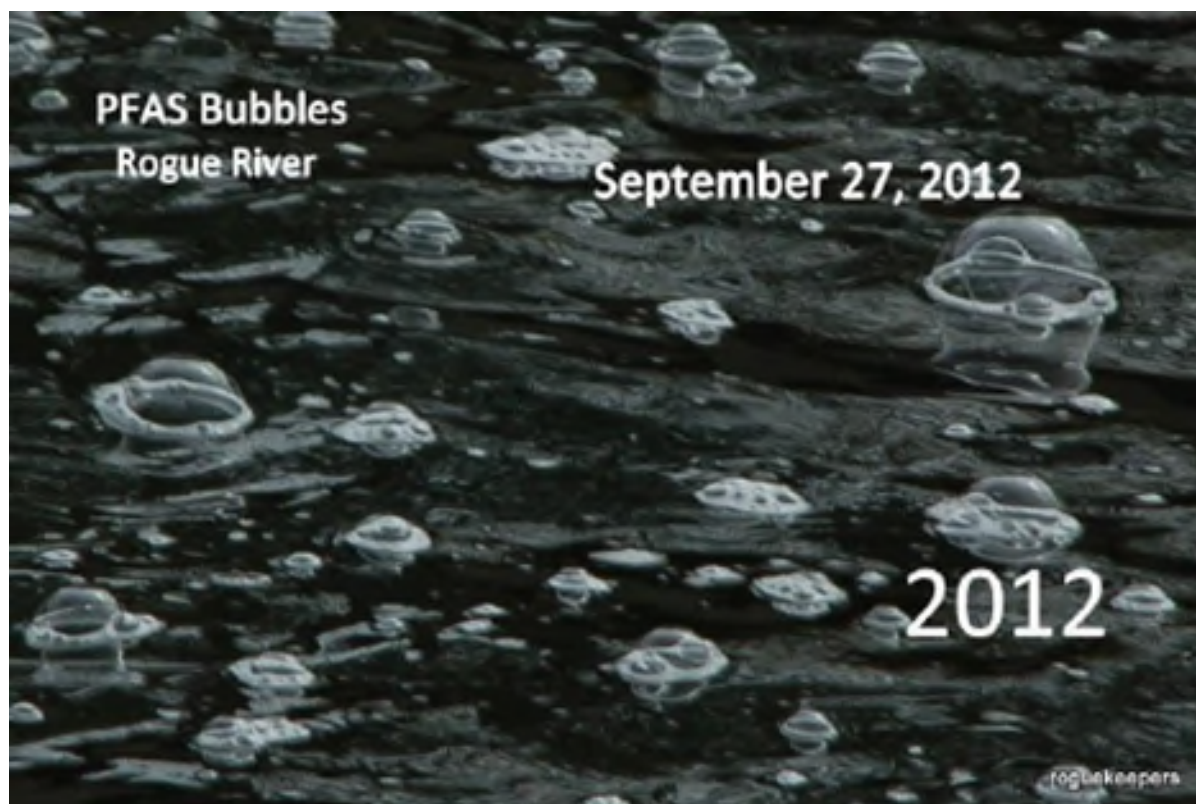


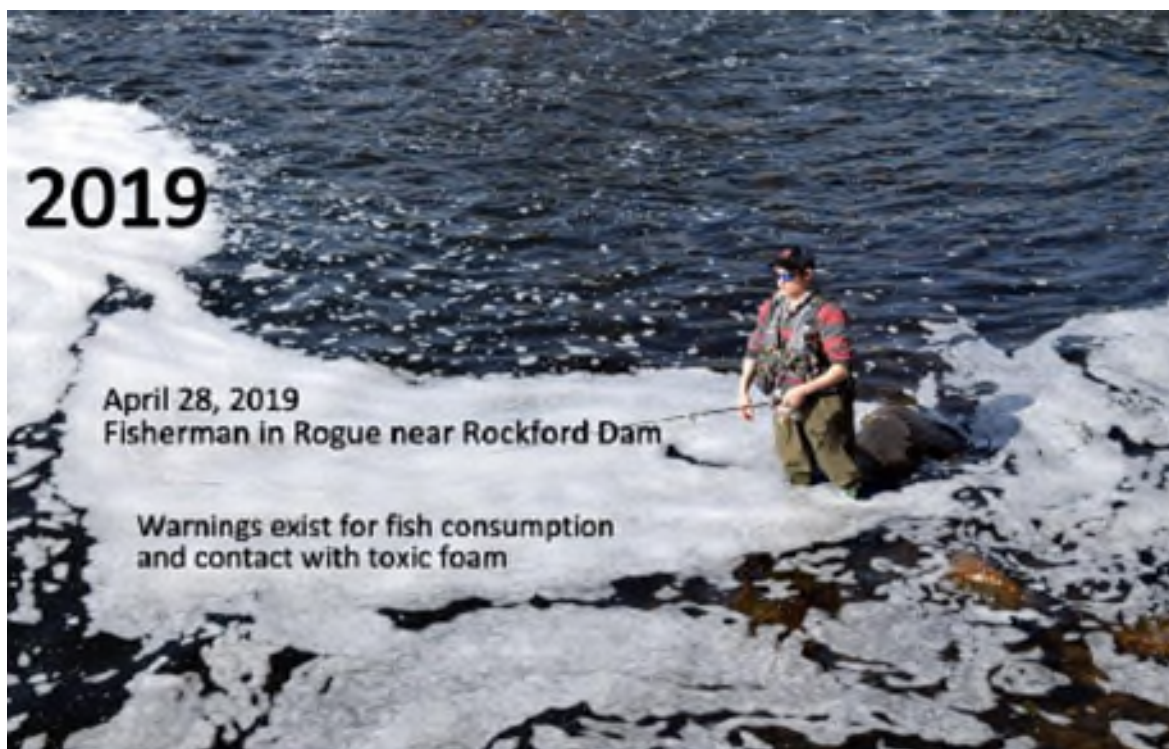
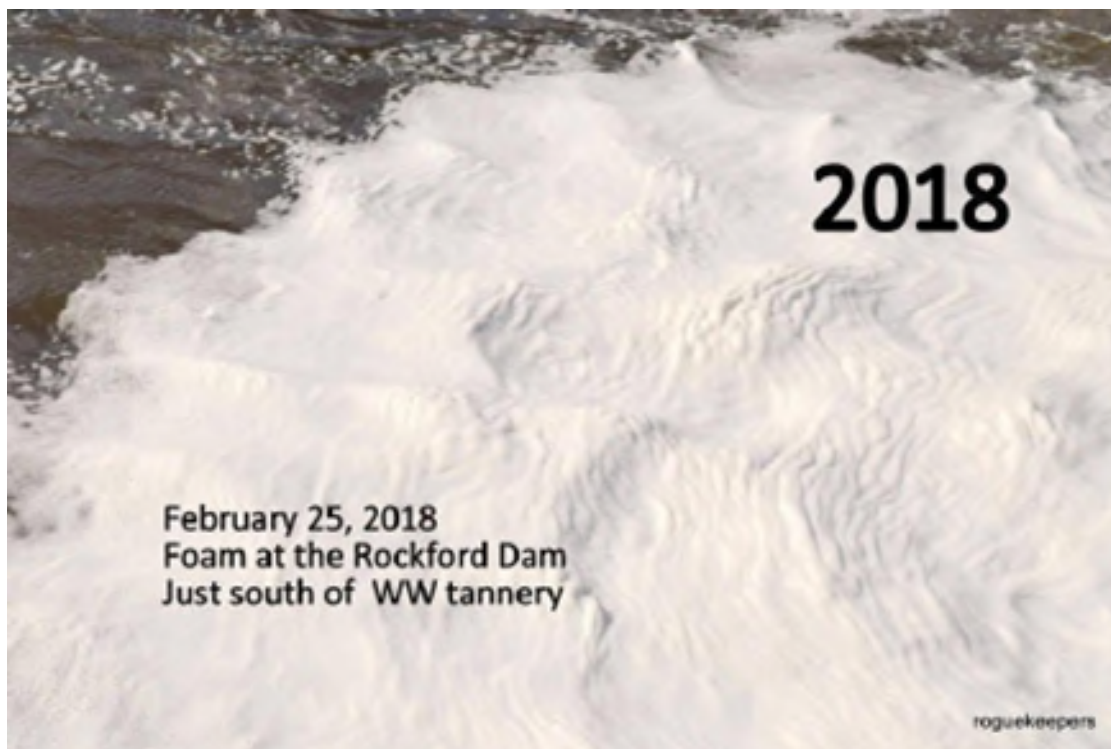
















I write this note in addition to public comment made at the hearing on January 10th 2023.

I am a citizen of Rockford and I've been involved with concerns regarding the contamination at the demolished Wolverine worldwide, tannery site in Rockford, Michigan.

I have documented the appearance of surface water on the Rogue River from 2010 to 2023. I have submitted an album of photos that show the appearance of PFAS foam, bubbles and films on the river. These photos are

dated, and they clearly show that there have been no signs of improvement to the Rogue River from 2010 onto the last date of January 10 2023.

Also included in this album of photos are some maps and visuals. maps. They show approximate areas PFAS plumes enter the Rogue River related to Wolverines disposal sites in northern Kent County.

The map showing these plumes does not include the most recent addition-- the WW Sole plant just north of the tannery site, which is listed as an MPART investigation site. located.

A second visual shows clearly that very high concentrations of PFAS are entering the Rogue River at TMW 101, south of Rum Creek--an area where Scotch guard continuing PFAS was once stored in outside storage areas. TMW 101 shows a level of 520,000 parts per trillion of PFAS. This map highlights ELEVATED concentrations of PFAS at seven different points along the riverbank. These correspond to the infographic prepared by M live which documents where the different Scotchguard areas existed.

Specific Comments:

1. Wolverine worldwide received a violation because they stalled last year in getting going on the plan already approved in March 2022. Whether a better outcome results from this delay remains to be seen. However, as a citizen who cares about my beautiful natural resource, the Rogue River, a country's scenic river that goes through my town, I strongly recommend that EGLE deny the timeline presented in this most recent plan. Construction should begin this summer—no later. Wolverine may be squeezed for time and money, but it is a fitting consequence for their irresponsible delay this past year of 2022.
 2. Having extensively read Work Plans prepared by Rose and Westra/GZA over the past 13 years, I am well aware that scrutiny of this work is essential at every point. I have no trust that plans prepared for Wolverine, apart from unilateral orders, will achieve a high quality standard. Please scour them.
 3. Surface water measurements of PFAS/ammonia should be taken both north and south of the tannery site, as frequently as needed. This is essential data.
 4. We propose clear timelines with clear benchmarks of progress made. The public needs to be updated at least once a month, as well as the Wolverine CAG. Penalties should be assigned—financially, if deadlines are not met.
 5. Rum Creek needs more study and a better designed system, per comments made by the Wolverine CAG. I am in solid agreement with the CAG's statements, including removing the cement culvert that encloses Rum creek. This could be accomplished while equipment is available, and the trench system is installed. Once the interceptor system is installed, there may never be another good opportunity to return Rum Creek to a healthy and natural state.
 6. I also concur with the Wolverine CAG that verified control of the PFAS plumes from the Wolverine tannery are a critical part of restoring damages to our precious Natural Resource, the Rogue River.
- Thank you for your time considering these comments.

Dear Ms. Vorce.

Please attach this addendum to my other comments sent earlier today.

I wanted to add my full support to the statements and reasoning which are made very clear in these 2 pages that appear in the Wolverine CAG comments. They strongly support the concerns I shared verbally at the Public Hearing, and the photos and maps sent in my previous comments in turn support these statements. Levels of PFAS must be considered at deep enough levels and contamination near the edge of the river must be addressed in a *working* shallow trenched model. Will trenches installed too far from contaminated areas and at ineffective depths really address the seriousness of this contamination.

I have great concern that the plan, as is, will not.

Thank you,

- The trenches are deep enough to capture the vertical extent of the pollution.
- The system is designed and monitored so that the migration of the fine particles in the surrounding soil strata does not pass into the trenches and reduce their ability to capture contaminated groundwater. These trenches will be in operation for many years, and the extraction volumes in the sumps must be monitored for flow changes due to plugging.

We are especially concerned that the trench system is located 70-130 ft from the Rogue River and that the highest levels are near the shoreline (Figure 1). The trench system is much closer to Rum Creek than the Rogue River and will receive far less groundwater at a shallower depth. WW did not justify why the trench was closer to Rum Creek for most of the shoreline perimeter than the trench system proposed along the Rogue River.



Figure 1. PFAS Contamination Map and Proposed Recovery System.

WW's statement on page 26 about low hydraulic gradients resulting in "few exchanges of pore water over years" is misleading. PFAS transport will still occur by diffusion from high to low concentration gradients (site to the surface water) and from low permeability soils to the permeable gravels and sands in the stream (Fetter et al. 2017). Flowing water (especially during high flow events) and burrowing organisms will also enhance contaminant diffusion. Due to site heterogeneity impacting the representativeness of the piezometers and issues with the conclusions about pore water and the inherent uncertainty associated with water elevation measurements (Figure 4), the only way to verify that the passive trench is preventing PFAS from reaching surface water is to conduct sampling of the affected streams.

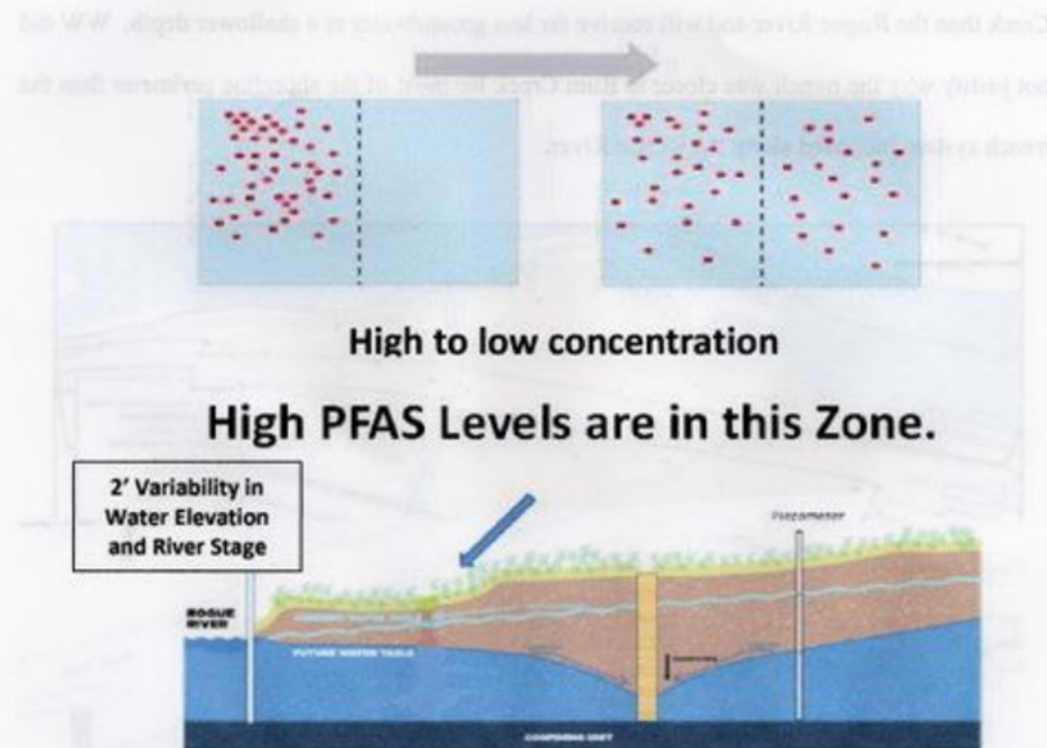


Figure 4. The Influence of Diffusion, River Stage, and Water Elevation on Piezometer Values.

EGLE Response: Thank you for sharing your comments and photographs. EGLE shares some similar concerns as you have outlined in your comments. EGLE is requesting Wolverine provide justification for the location of the trench; however, please note that locating the trench too close to the river will pull in river water and increase system maintenance. The restoration of Rum Creek to a natural state is not governed by Part 201; however, this comment has been passed onto Wolverine. EGLE's full response can be seen in our attached March 10, 2023, response letter to Wolverine.

Protection of Public Health & Environment Comments

(For comment numbers 13 through 230, one response is provided after comment number 230)

13. Commenter: James VanDokkumburg

Comment: Please hold Wolverine to task in cleaning up their messes, including downtown where PFAS is introduced into the Rogue River near the dam. This is of their making, and they cynically tried to cover it up a few times, including getting into bed with the city over a new development some twenty years ago. They have major deep pockets, and need to spend their way out of this with best practices, not strategy and political leverage
Thanks for all you do to protect our singular and irreplaceable great lakes watershed.

14. Commenter: Payton Connell

Comment: Dear EGLE House Street,
I insist that you not let Wolverine Worldwide let implement their new cleanup plan go forward and instead have them clean up immediately. They have delayed for two years since the trial and are planning on waiting a significant time more. If you let them implement it, the damage will already be at a crescendo by the time they even start.
It is their doing that has caused them to have to deal with this, they should be held accountable for both what they did do and what they didn't. They are not helping the cleanup until 2024 and this being the start of 2023 makes it irrational to even consider a proposal like that. They should've acted immediately and helped aid the water supply. You cannot just let something as dangerous as PFAS run through water supply.
So finally, I ask you to please not accept their terms of delay, and potentially suggest a quicker and more reliable solution. What's to stop them from starting in 2025 unless you are stern with punishment?
Thank you

15. Commenter: Bill Otten, on behalf of Rogue River Watershed Partners

Comment: Dear Sir/Madam:
The Rogue River Watershed Partners (RRWP) are pleased to provide this input to the subject addendum as discussed during the public forum on 10 January 2023. The EGLE mission to protect Michigan's environment by managing water and land and solutions is aligned with the RRWP mission *to Protect, Preserve, and Promote the Rogue River and its Tributaries, and its Watershed*.
As described in the application, Wolverine World Wide, Inc. (WWW) has submitted an addendum to modify the Tannery Interceptor System Response Activity Plan dated March 31, 2022 (RAP) thereby causing a significant delay in the PFAS interceptor system design implementation. We commend the WWW effort to make the system design highly effective but are highly disappointed they did not identify system inadequacies in their initial System Response Plan.
We further urge WWW and EGLE to get the best subject matter experts possible to independently review this addendum. It is imperative that this version of the interceptor system achieve the goal of eliminating PFAS discharge into the Rogue River.
We also urge EGLE to use the full weight of the Consent Agreement including the specified stipulated penalties to hold WWW responsible and to keep any delays resulting from the system changes to a minimum. We additionally implore WWW to increase the priority of its corporate environmental responsibility. As evidenced in the recent WWW presentation at ICR this month, and in its 2021 Annual statement, their

commitment to corporate environmental responsibility is limited to meeting governmental regulations. As such, the RRWP remains highly disappointed in WWW as a responsible corporate citizen. Every day that passes is another day that the (PFAS) contamination is being freely discharged to the Rogue River Watershed, negatively impacting fish, wildlife, and humans. This response has been approved by the RRWP board of directors.

16. Commenter: Renae & Santiago Mata

Comment: Dear Ms. Vorce et al,
Wolverine has obviously been delaying much-needed PFAS cleanup and it's well past time to crack down on it - especially with the latest evidence that freshwater fish are even more contaminated than we realized (just "one serving of freshwater fish a year is equal to drinking PFAS-laced water for a month"!) Money talks/incites action, so please do more than just threaten civil fines for not honoring schedules that should be bound by the consent decree.
Construction on the treatment systems must begin this spring/summer.
Also, as Plainfield Twp residents whose family drank the Twp municipal water for 20 years (including my teenage boys starting in utero), we are VERY interested in seeing more (any) studies done on Twp residents who drank the tainted municipal water, not just private wells.
We would very much appreciate a response to the above comments on Wolverine's plans that need to come to fruition ASAP.

17. Commenter: Susan Ungrey

Comment: Dear EGLE House Street,
You need to do the right thing and clean this mess up that was due to Wolverines negligence. This created so many health problem for so many families and for the environment. Please reject their plan and do the right thing, hold Wolverine accountable!!
God Bless,
Thank you

18. Commenter: Cynthia Clarke

Comment: I think the plan should be rejected due to how it may harm the community.

19. Commenter: Diana R Wallis

Comment: I'm writing concerning the delay by Wolverine World Wide in obeying the court-ordered cleanup of the PFAS contamination that the company created.
For the Great Lakes state NOT to have clean, safe drinking water in many places makes "Pure Michigan" seem like a joke. Yes, back in the old days, when Wolverine first started making shoes, no one thought much about contamination. Times have changed, and we now have a clearer understanding of how damaging the chemicals are to human bodies, how destructive to wildlife, and how long-lived in the environment. We can't undo the past, so we have to go forward cleaning up what we've soiled as much as possible. Please take whatever legal action is available to you to enforce the court order for Wolverine to clean up the contamination. The plan they've submitted should be rejected as inadequate--apparently it doesn't even stop the poison from flowing into the river-to-Lake Michigan system! The longer WWW delays, the greater the cost to the company but also the greater the harmful costs to the people of Michigan.
It's bad enough that "Pure Michigan" seems like a joke. Won't it be worse if it seems like a lie?

20. Commenter: Brian Way

Comment: Greetings!
My name is Brian Way and I've been a Rockford citizen for the last 6 years. My family and I enjoy the beauty of

downtown Rockford and the surrounding river area. I'm writing to support our natural resources and advocate for increased measures on Wolverine Worldwide and their PFAS clean up. We need further accountability to mitigate further environmental issues and protect our citizens. I feel that the addendum to the Tannery Interceptor System Response Activity Plan submitted by Rose & Westra on behalf of Wolverine World Wide falls short of serving the best interests of community and should be rejected until a stricter improvement plan is in place.

I'd be happy to answer any further questions so please reach out to me at [REDACTED] or at [REDACTED].

21. Commenter: Julie Spahn

Comment: Dear EGLE House Street,

Please make sure that Wolverine submits the strongest plan possible to protect our water and our health.. Thank you.

22. Commenter: AliciaMarie Belchak

Comment: Dear EGLE House Street,

As a West Michigan resident and someone who lives downstream from Rockford, MI on the Grand River, I am writing to add my support and advocacy for BETTER and GREATER accountability of the polluters -- like Wolverine Worldwide --that contribute to the demise of Michigan's environment and her people.

I STRONGLY urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess in it's ENTIRETY -- with all due conscientious care and completion to the best science and technology available no matter the cost.

This is essential so that people can live safely and in a healthy fashion for years to come AND so that Michigan's air, soil and water resources can be FULLY protected for generations to come AND so there remains a viable and a robust ecosystem that maintains the ability to support ALL of Michigan's creatures who rely upon it.

There is no question or doubt that Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford, MI. This is a fact that has been well established and, although the company may drag its feet on complying with any rules, regulations or remediation stemming from that operation, it DOES NOT REMOVE CULPABILITY for the damage caused.

Wolverine Worldwide is a company that has PROFITED IMMENSELY over 50 years in producing the shoes and leather supplies in its tannery, and it has done so without consideration or accounting for the pollution products, like PFAS, that have contaminated drinking water and caused serious health complications.

This has greatly impacted local residents and created unintended but very real negative consequences in the health and well-being of West Michigan. Regardless of the company's costs or financial concerns, it is their RESPONSIBILITY to respond appropriately and swiftly to the care and concern of the local region that supported them in garnering those profits and production capacities over the decades.

Wolverine Worldwide MUST be held ACCOUNTABLE to taking care of business in the environment and health arena as much as their internal business for shareholders or private investors. Perhaps their duty is even greater to the public in that regard!

Yet, instead, the company has been slow to respond, quick to deny or maintain they couldn't have known, and disingenuous in its designs for adequate remediation and clean up.

Is this the kind of behavior Michigan desires from its businesses and economic partners? Is this the way we will promote a beautiful and bustling state full of economic opportunity and environmental resources?

No, I do not believe you or any reasonable person would agree that this kind of response is acceptable for our Great Lakes State.

So, that is why EGLE must not accept the current "cleanup" plan that has been proposed by Wolverine Worldwide.

Despite having had sufficient time and significant delays, Wolverine Worldwide has managed to scuttle their opportunity to provide a sufficient plan for addressing the PFAS contamination caused by their tannery.

Their plan is anemic at best and negligent at worst. It utterly fails to go far enough for cleaning up the mess they created in the course of financially gaining from Michigan's generosity AND it FAILS to stop the flow of PFAS into the Rogue River & surrounding critical waterways -- like the Grand River & Lake Michigan. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. The PFAS flow MUST STOP and be fully contained. There is no reason to accept the plan as put forth from Wolverine Worldwide. And I believe it is your duty to REJECT THE PLAN in its current state. Please hold Wolverine Worldwide to the fire of public concern and the greatest good for Michigan. Please tell them to return to the drawing board and come back with something far better. Let's make sure they submit the strongest plan possible to protect our water and our health.. Thank you.

23. Commenter: Carol Hennesy

Comment: To EGLE officials,
Last year, one of my son's considered moving his family back to Michigan and specifically to northern Kent County. As friends learned where he was looking, they asked, "Is it safe?" One of my colleagues on the Kent County Commission advised to be careful where he was looking at homes. A better plan needs to be developed for PFAS remediation! I urge you to reject Wolverine Worldwide's most recent PFAS remediation plan for the Rockford, MI, area and hold the company accountable. Wolverine Worldwide is responsible for the widespread contamination by PFAS and needs to clean up its mess. The plan as developed will not stop the flow of PFAS into the Rogue River or nearby critical waterways. Again, I urge you to reject Wolverine's proposal and make sure they submit the strongest plan possible. Protect our water and our health! Protect all of Kent County as a healthy desirable place to live, work and recreate!
Sincerely,

24. Commenter: Elena Swirczek

Comment: Dear EGLE House Street,
My name is Elena Swirczek and I am a Michigan resident who is extremely concerned about PFAS contamination. I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.. Holding Wolverine accountable is important for people all over Michigan, not just Rockford residents. Thank you.

25. Commenter: Anthony DeMarco

Comment: Dear EGLE House Street,
I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine operated its tannery in Rockford until 2009, decades after the dangers of PFAS had been discovered. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

26. Commenter: Trisha Whitcomb

Comment: Dear EGLE House Street,

PFAS pollution and contamination is one of the most frightening dangers for my children's future. I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for comprehensively cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. We are already hearing these reports about fishing, etc. and we cannot accept any further pollution.

Please make sure Wolverine submits and is held accountable the strongest plan possible to protect our water and our health.

Thank you.

27. Commenter: Sarah Schaefer

Comment: Dear EGLE House Street,

I strongly urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

28. Commenter: Christine Parks

Comment: Dear EGLE House Street,

As a live long Michigan resident who lives in a neighborhood which was affected by PFAS contamination, I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

29. Commenter: Zackery Gay

Comments: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.

Thank you.

30. Commenter: Murielle Garbarino

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine Worldwide is responsible for widespread PFAS

contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. This issue of great personal interest to me as the drinking water at my elementary school in Grand Haven, MI was contaminated with PFAS. Additionally, I have several friends who are from Rockford and also were exposed to contaminated water. Human and environmental health needs to be protected and Wolverine's plan is inadequate.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

31. Commenter: Robert Parrish

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health. Polluters like WWW MUST be held accountable for what they have done.

Thank you.

32. Commenter: Valerie Deur

Comment: Dear EGLE House Street,

The people affected by illegal dumping have waited long enough. Please reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..
Thank you.

33. Commenter: Amy McFadden

Comment: Dear EGLE House Street,
Simply: Make them do better.

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

Thank you.

34. Commenter: James Corbett


Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..


Thank you.

35. Commenter: Gordon Jones

Comment: Dear EGLE House Street,

Hold Wolverine accountable for their mess!!

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..
Thank you.

36. Commenter: Elliott Smith

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. This is especially concerning to me because the Rogue River feeds into the Grand River, near which several of my family members live. Wolverine Worldwide does not have the right to contaminate the drinking water for my family. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.. Thank you.

37. Commenter: Jonathan Smith

Comment: Dear EGLE House Street, I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health. They are responsible to right a wrong and you must do the job correct the first time around. This community is impacted from these forever chemicals in a permanent way. Hold them accountable! Thank you.

38. Commenter: Christy Valentine

Comment: Dear EGLE House Street, I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.. Ionia County currently is home to Pitsch Landfill, in Orleans Twp. There are several areas on the Pitsch property that PFAS has been discovered, EGLE is monitoring these sites. The point I'm trying to make is the discovery of PFAS and other forever chemicals, in our areas, is only the "tip of the iceberg" in our heavily industrialized state. I do not feel half measures in Rockford clean up process should be considered.

39. Commenter: Melissa Janes

Comment: Dear EGLE House Street, No amount of PFAs flowing or disposed into Michigan water is acceptable it's time to force Wolverine to clean up the mess, and for our state and corporations to be an ethical, transparent leaders in stewarding a complex problem. I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..
Thank you.

40. Commenter: Jackson Wagner

Comment: Dear EGLE House Street,
Environmental harm is an infringement on the rights of everyone it affects. To people whose bodies are harmed, to people who are deprived of access to healthy ecosystems, and people not yet born.
It behooves you to reject Wolverine Worldwide's new PFAS clean-up plan for Rockford, MI, and hold them accountable for cleaning up their mess.
Wolverine Worldwide is culpable for widespread PFAS contamination in Rockford which has contaminated drinking water and caused serious health complications, and greatly impacted local residents.
After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.
The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.
Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..
Thank you.

41. Commenter: Anisa Williams

Comment: Dear EGLE House Street,
I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.
Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.
After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways - including the Grand River and Lake Michigan.
As many are aware, the drinking water of hundreds of thousands of West Michigan residents is pulled from Lake Michigan. As the Rogue River and the Grand River watersheds all end in Lake Michigan, these forever chemicals may be infiltrating our potable water. This is a larger impact for all of us!
The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.
Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..
Thank you.

42. Commenter: Susan Creager

Comment: Dear EGLE House Street,
I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.
Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. I know a person who lost her husband to cancer, lost her water supply and her home is largely without value. That's just one person in this otherwise beautiful community.
After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.
The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.
Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..
Thank you.

43. Commenter: Misty Lambert

Comment: Dear EGLE House Street,
Please READ CAREFULLY!!!!

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

44. Commenter: Mary Madigan

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. It is time that negligent corporations step up to do the right thing, if not for the public good, at least for their own their leaders' children's and grandchildren's futures.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. It is time to take seriously the devastation being done to our precious natural resources.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

45. Commenter: Bill Haney

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank

We are talking about lives and our planet here—we need far more strenuous action on this. It has to be given urgent priority.

46. Commenter: Suzanne Van Dam

Comment: Dear EGLE House Street,

As a long-time resident of Michigan, a mother, and a member of the Michigan League of Conservation Voters, I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.. Thank you.

47. Commenter: Julie Frick

Comment: Dear EGLE House Street,
I think we should have stronger penalties for companies that pollute our rivers, streams and Lakes. I can't believe that Wolverine Worldwide continues to delay it's required cleanup of PFAS. I am asking the board not to approve any more delays in the clean up. This should have started already. To delay means further pollution. I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.. Thank you.

48. Commenter: Tina Garcia

Comment: Dear EGLE House Street,
I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.. Please stop PFAS from flowing into the Rogue River and surrounding area. I fear the fatal consequences from drinking this contaminated water for at least 26 years now. I fear the health of my family and future human lives are at risk of living and dying with the pain a suffering these chemicals do to our organs; all because of the arrogance and ignorance of those in charge and of corporate greed. Do the right thing, please! Thank you.

49. Commenter: Donald Harrison

Comment: Dear EGLE House Street,
Please reject Wolverine Worldwide's ineffective and weak PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its serious, pollution mess. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes!

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you for your time and care with this important matter.

50. Commenter: Amy Rogghe, PA-C

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

For the sake of our health, our ecosystem and future children, they MUST be held accountable. Their plan is grossly insufficient.

Please do the right thing and reject their plan.

51. Commenter: Adam Johanson

Comment: Dear EGLE House Street,

As someone who lived in West Michigan for many years, I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

Should their inadequate plan be allowed to continue, the EGLE will be announcing that it cares more about the profits of some soul-less corporation than the lives of Michiganders.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

52. Commenter: Stephen C. Brown

Comment: Dear EGLE House Street,

This is too little, too late. I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

53. Commenter: Annika M. Seigel

Comment: To whomever it may concern,

My name is Annika Seigel, and I am a current student at the University of Michigan. I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you,

54. Commenter: Armando Saucedo

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health...

Companies should be held responsible for the environmental messes they create, the remediation plan is not enough.

Thank you.

55. Commenter: Jamila Martin

Comment: Dear EGLE House Street,

Michigan has to make corporate polluters pay! We can't keep subsidizing corporate criminals with public dollars and the loss of public health.

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

56. Commenter: Gary Siorek

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. The dangers of PFAS have been illustrated in many other cases, where it was used in making fire fighting foams, stain repellents, non-stick cookware, the list goes on. It has already entered Lake Michigan, and is probably present in all the Great Lakes. Everything should be done to at least reduce any further sources of this toxic man made brew from impacting our natural world. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.. Thank you.

57. Commenter: Mara Reid

Comment: I urge you to demand more from the Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. My husband and I recently moved to Rockford, MI with our 8 month old daughter and two dogs. We chose Rockford as a place to live because of its abundant outdoor activities and the quality of life. We love spending time outdoors biking, kayaking, and hiking. The natural resources in Rockford are one of the biggest attractions to the area. My husband and I envision raising our family here and making a lifetime of memories with activities on the Rogue River and surrounding area. Wolverine Worldwide is a great resource to the area. It's a large employer and gives back in many ways to the Rockford area. I fully believe that it's possible to believe in the goodness of a Company while also holding them accountable for their actions. They are too large of an organization to have any excuses for why cleanup cannot be thorough and speedy. The damages that the PFAS contamination has caused are extreme, they have known about them for too long, and they need to take action to fix what they have done wrong. Please make sure they submit the strongest plan possible to protect our water and our health. My family is counting on it. Thank you,

58. Commenter: Deb Freiman

Comment: Dear EGLE House Street, I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess. Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents. After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways. The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes. Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health and future generations. Thank you.

59. Commenter: Brandy Reyes

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

We demand justice for poisoning the innocent people.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you

60. Commenter: Abby Barker

Comment: Dear EGLE House Street,

My name is Abby Barker. I moved to Kent County in 2021 and was excited to learn more about the community. Upon doing so, I quickly learned about PFAS and the lasting impact it has in Rockford and the surrounding areas due to the negligence of Wolverine Worldwide. I heard from community members whose lives were uprooted from their neighborhood and environment being destroyed, having to switch over their drinking water, losing home value, and even losing loved ones and having to deal with the negative health impacts caused by Wolverine's mess. With this amount of damage done, it is critical that Wolverine Worldwide is held fully accountable in sufficiently cleaning up their toxic contamination. This is the least they can do for the community they've impacted and those they continue to put at risk.

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company fully accountable. The plan does not adequately address their toxic contamination. It does not include a sufficient plan for monitoring and testing, and there are no safeguards in place to prevent and track the flow of PFAS contamination into the Rogue River, putting the Rogue River, Grand River Lake Michigan, our environment, and the health and wellbeing of thousands at risk for contamination. The science is very clear that no amount of PFAS chemicals are safe.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

61. Commenter: Paula Naujalis

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

My late husband would take me boating on the Grand River and into the Rouge River which was always much clearer than the Grand. Other boaters said it was the chemicals that were dumped into it. That was over 20 years ago so it was known even then that it was contaminated...

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

62. Commenter: Alexander Toren

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Why would we continue to allow a corporation to dictate how they effect something that was never theirs to begin with?

Our water is not a commodity to be controlled by corporations who lack our best interest in mind.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health.

Thank you.

63. Commenter: Ethan Petzold

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

64. Commenter: Samantha Schubert

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

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Thank you.

65. Commenter: Kathleen Pepin

Comment: Dear EGLE House Street,

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66. Commenter: Marcia Burton

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67. Commenter: Annabelle Wilkinson

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68. Commenter: Sydney Muller

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69. Commenter: Hillary Crawford

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70. Commenter: Patrick Hogan

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71. Commenter: Jordan Tirico

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72. Commenter: Jeffery Morgenthaler

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73. Commenter: Pamela Nordhof

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74. Commenter: Audrey Flanders-Sundstrom

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75. Commenter: John Hooper

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76. Commenter: Virginia Jones

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77. Commenter: Jaeden Wang

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78. Commenter: Linda Prostko

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79. Commenter: Jeffrey DeYoung

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80. Commenter: Paul DeBoer

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81. Commenter: Shelly Winney

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82. Commenter: Samantha DeBoer

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83. Commenter: Susan K Welsford

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84. Commenter: Kristopher Kessel

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85. Commenter: Merry Ossenheimer

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86. Commenter: Judson Cadwell

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88. Commenter: Larry Jackson

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90. Commenter: Monte Rogers

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91. Commenter: Deandre Jones

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92. Commenter: Maria Miller

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93. Commenter: Susan Carlson

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94. Commenter: Sue Hadden

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95. Commenter: Mya Harmer

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96. Commenter: Hugh Hufnagel

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97. Commenter: Jasmine Wu

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98. Commenter: James Mirkle

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99. Commenter: Emma Woelkers

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100. Commenter: Will Felix

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101. Commenter: Jessica McCoy

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102. Commenter: Shruti Machiraju

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103. Commenter: Arianna Soresi

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104. Commenter: Samantha Grimes

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105. Commenter: Priscilla Dyer

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106. Commenter: Annie McCombs

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107. Commenter: George Perakis

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108. Commenter: Jeanine Weber

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After significant delays, Wolverine's new PFAS "cleanup" plan is insufficient and will not stop the flow of PFAS into the Rogue River and surrounding critical waterways.

The science is clear: No amount of PFAS chemicals are safe – for humans, wildlife, or our Great Lakes.

Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

109. Commenter: Pamela Goodman

Comment: Dear EGLE House Street,

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110. Commenter: William Gray

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111. Commenter: Dorothy Willoughby

Comment: Dear EGLE House Street,
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112. Commenter: Peter Boogaart

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113. Commenter: Jonah Cameron

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114. Commenter: Janet Zahn

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115.Commenter: Callie Melton

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116.Commenter: Pawel Sowizdzal

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117.Commenter: Viviana Castelan Alamillo

Comment: Dear EGLE House Street,

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118.Commenter: Elisa Webster

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119.Commenter: Catherine Anderson

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120.Commenter: Lee Anzicek

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121.Commenter: Ruth Saltzman

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122. Commenter: Spencer Coffman

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123. Commenter: Felicia Swirczek

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124. Commenter: Karissa Hapke

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125. Commenter: Shirley Hebert

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126. Commenter: Emily Shepley

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127. Commenter: Jalen Richardson

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128. Commenter: Dustin Reid

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129. Commenter: Andrew Collins

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130. Commenter: Nathan Miller

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131. Commenter: Ariana Riegel

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132. Commenter: Chad Oberdoerster

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133. Commenter: Elizabeth Fahling

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134. Commenter: Shannon Ervin

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135. Commenter: Lee Berry

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136. Commenter: Robert Simmons

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137. Commenter: Amani Johnson

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138. Commenter: Monica Staiger

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139. Commenter: Michele Zebell

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140. Commenter: Denise Rumsey

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141. Commenter: Kathryn Wenske

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142. Commenter: Tobyn McNaughton

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143. Commenter: Anne Schweizer

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144. Commenter: Kathleen Pool

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145. Commenter: Marcia Kutchin

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146. Commenter: Cheryl Hicks

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147. Commenter: Erin Dumond

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148. Commenter: JoAnne Pantale

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149. Commenter: Aziza Poggi Ortiz

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150. Commenter: James Stover

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151. Commenter: Shawn Slusser

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Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

152. Commenter: Ann Benson

Comment: Dear EGLE House Street,

I urge you to reject Wolverine Worldwide's new PFAS remediation plan for Rockford, MI, and hold the company accountable for cleaning up its mess.

Wolverine Worldwide is responsible for widespread PFAS contamination in Rockford that has contaminated drinking water and caused serious health complications, and greatly impacted local residents.

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153. Commenter: Mary Pallas

Comment: Dear EGLE House Street,

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Thank you.

154. Commenter: Madison Goff

Comment: Dear EGLE House Street,

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155. Commenter: Kaelan Goff

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156. Commenter: Marjorie Edwards

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157. Commenter: Stacey Anderson

Comment: Dear EGLE House Street,
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158. Commenter: Julia Chambers

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159. Commenter: Lisa Healey

Comment: Dear EGLE House Street,
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Thank you.

Lisa Healey

160. Commenter: Kimberly Conner

Comment: Dear EGLE House Street,

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161. Commenter: Taylor Lackey

Comment: Dear EGLE House Street,

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162. Commenter: Patricia Crater

Comment: Dear EGLE House Street,

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163. Commenter: Michelle Van Harn

Comment: Dear EGLE House Street,

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164. Commenter: Carol Presant

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165. Commenter: Heather Konen

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166. Commenter: Deborah Adams

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167. Commenter: Kristen Schavey

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168. Commenter: Corbett Suzan

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169. Commenter: Erica Kavaky

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170. Commenter: Katherine Vogt

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171. Commenter: Katharine Miller

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172. Commenter: Marcia Burton

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173. Commenter: Suzanne Markus

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174. Commenter: Daniel Burton

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175. Commenter: James Stover

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176. Commenter: Sonia Kadrovach

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177. Commenter: Margie Smallfield

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178. Commenter: Lewis Okun

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179. Commenter: Michael ODonnell

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180. Commenter: Madeline Peery

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181. Commenter: Alex Smith

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182. Commenter: Catherine Panyard

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183. Commenter: Megan Johns

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184. Commenter: Michele VanderVelde

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185. Commenter: Mark Vandervelde

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186. Commenter: Erica Bloom

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187. Commenter: Steven Bush

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188. Commenter: Sara Buursma

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189. Commenter: Michael Lebaron

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190. Commenter: Sharon Schwab

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191. Commenter: James McQueen

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192. Commenter: Jada Robinson

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193. Commenter: Ned Andree

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194. Commenter: Annika Seigel

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195. Commenter: David Pirkola

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Please reject Wolverine's plan and make sure they submit the strongest plan possible to protect our water and our health..

Thank you.

196. Commenter: Johnnie Walker

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197. Commenter: August Treu

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198. Commenter: Jordan France

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199. Commenter: Amanda Naccarato

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200. Commenter: Nurya Parish

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201. Commenter: Constance White

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202. Commenter: Sherene McCloy

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203. Commenter: Sophie Wyatt

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204. Commenter: Kimberly Miller

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205. Commenter: Huzaifah Nadeem

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206. Commenter: Martin Schnur

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207. Commenter: June Groendyk

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208. Commenter: Mary Koenen

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209. Commenter: Daniel Bazy-Schmidt

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210. Commenter: Carrie Husken

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211. Commenter: Joan Walsh Duffy

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212. Commenter: Brett Guilmette

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213. Commenter: Sharon Rydzewski

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214. Commenter: Jennifer Lamphere

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215. Commenter: Todd Ellis

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216. Commenter: Kirsten Fedorowicz

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217. Commenter: Noelle Riccobono

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218. Commenter: Andrew Collins

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219. Commenter: Natalie Hayes

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220. Commenter: Taryn Indish

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221. Commenter: Nicole Lenz

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222. Commenter: Ansleigh Hamilton

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223. Commenter: Sarah Hill

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224. Commenter: Evangeline Mengelkoch

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225. Commenter: Alexis Luong

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226. Commenter: Erin McClain

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227. Commenter: Christine Clark

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228. Commenter: Phoebe Hopps

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229. Commenter: Matthew Milzarski

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230. Commenter: Sue Paananen

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EGLE Response: Thank you for sharing your comments. Paragraph 7.7 of the Consent Decree requires that the interceptor system be appropriately sized to address and control PFAS Compounds contamination in groundwater at the Tannery before it enters the Rogue River. EGLE shares public concerns about the delays as noted in the October 19, 2022, Violation Notice. EGLE has requested a more detailed schedule be submitted for EGLE approval as part of the Revised Tannery Interceptor System Response Activity Plan. EGLE's full response can be seen in our attached March 10, 2023, response letter to Wolverine.



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

March 10, 2023

VIA EMAIL ONLY

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

Dear Dave Latchana:

SUBJECT: Denial of the Tannery Interceptor System Response Activity Plan
Addendum as Required by the Wolverine World Wide, Incorporated
Consent Decree Court Case No.: 1:18-cv-00039
Facility ID No.: 41000451

The Michigan Department of Environment, Great Lakes, and Energy, (EGLE), Remediation and Redevelopment Division (RRD), has reviewed the Response Activity Plan (ResAP) Addendum for the property located at 181 North Main Street in Rockford, Kent County, Michigan submitted by Rose & Westra, a Division of GZA GeoEnvironmental, Inc. (GZA) on the behalf of Wolverine World Wide, Inc. (Wolverine) on December 1, 2022. The Tannery Interceptor System is a requirement of the Consent Decree (effective February 19, 2020) as described in Paragraph 7.7 of the Consent Decree. EGLE approved the Final Tannery Interceptor System ResAP submitted by GZA on behalf of Wolverine on March 31, 2022. This Addendum provided supplemental information and modified portions of the EGLE-approved March 2022 ResAP in accordance with Paragraph 7.14 of the Consent Decree.

As outlined in Section 15 (Submission and Approvals) 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 disapproved if applicable. The Tannery Interceptor System ResAP Addendum has been disapproved for the following reasons:

Modeling Comments:

1. Contamination is present between the trench and the Rogue River to the west. If particle tracking has been conducted from these areas of contamination to the trench, that modelling should be included in the Revised Tannery Interceptor System ResAP (Revised ResAP).

2. Additional scenarios should be modelled prior to system installation, including how the system will accommodate peak flow periods due to storm events and higher turbidity.
3. Verify that the storm and sanitary sewer utilities are included within the groundwater model since site infrastructure can impact groundwater flow.

General Comments which apply to entire report (may not be called out in specific report sections below):

4. The re-submittal of this denied ResAP should be provided to EGLE as a fully Revised ResAP (revising the March 31, 2022, version), not as an addendum report as it was provided in December 2022.
5. Additional information should be included in the Revised ResAP regarding how the location of the trench was selected. A pilot trench may be warranted to evaluate the subsurface conditions and better understand the placement and depth of the proposed trench system prior to installation.
6. If the trench is not continuous across the length of the Rogue River and Rum Creek, provide information on how per- and polyfluoroalkyl substances (PFAS) will be addressed in the space between the trench segments.
7. A comparison of trench elevations and elevations of PFAS groundwater contamination is required in order to evaluate how the depth of PFAS contamination correlates with the proposed trench depths and how performance of the system will remedy each water bearing zone or aquifer.
8. Include what contingencies or actions will be taken if there is evidence of PFAS contaminated groundwater flowing under the trenches.
9. Although a Long-term Operations and Maintenance (O&M) Plan will be included in the Completion Report, an interim O&M Plan should be included in the Revised ResAP. The interim O&M Plan should include a schedule for detecting and identifying problems and finding solutions if trench systems go down. EGLE also anticipates that this plan will include proactive measures to keep the trench system up and running, such as regular flushing of the sumps and piping.

Specific Comments by report section:

10. Section 4.4.1 Groundwater Collection Trenches

Additional details regarding the design of the trenches should be provided in order to better understand how the design of the trenches will guarantee flow to the sumps if float switches or gravity flow (or a combination) will be relied on to maintain a lower head in the sump than in the trench.

11. Section 4.4.1 Groundwater Collection Trenches

Clarify if variable frequency drives (VFDs) are proposed to aid in flow control.

12. Section 4.4.1 Groundwater Collection Trenches

Additional information is needed to document that there are a sufficient number of sumps and cisterns based on the total footprint of the trenches.

13. Section 4.4.1 Groundwater Collection Trenches

The diameter of the sumps may need to be increased to account for larger pumps, instrumentation, and cleanout capability.

14. Section 4.4.1 Groundwater Collection Trenches

Provide rationale for the decision to use 10-foot screens in the sumps.

15. Section 4.4.1 Groundwater Collection Trenches

The trench will accumulate silts and cleanouts will be needed to keep sections flowing. These cleanouts should be mentioned and included in the Revised ResAP.

16. Section 4.4.2 Extraction Wells

Similar to the sumps, the diameter of the extraction wells may need to be increased to account for larger pumps, instrumentation, and cleanout capability.

17. Section 4.4.3 Collection Cisterns

Design details of the cisterns should be provided to EGLE for review as part of the Revised ResAP.

18. Section 4.4.5 Piezometers

Details on the depths of the piezometers should be provided to EGLE for review. Lines of evidence should also be included within the report to support the number of piezometers proposed. EGLE does not believe that five river piezometers will be sufficient to demonstrate that PFAS contaminated groundwater is not venting to the Rogue River at concentrations above criteria.

19. Section 4.4.6 Pressure Transducers

Details regarding the types of instrumentation to be used should be provided to EGLE for review. Chosen instrumentation should not contain PFAS in wetted parts.

20. Section 4.4.6 Pressure Transducers

Update the report text to clarify that pressure transducers will be included in the trench piezometers (TPZs) and any other paired piezometers (i.e., PZDs).

21. Section 5.0 Schedule

The Revised ResAP should include a schedule containing actual dates (which EGLE understands in some cases will be based on anticipated permit issuance dates) for project deadlines for Phases I, II, and III.

22. Section 5.0 Schedule

Additional details are needed regarding the pilot testing in Phase II including the goals and metrics of the testing.

23. Section 6.0 Performance Monitoring Plan

In accordance with the approved March 31, 2022, ResAP, EGLE requests that weekly elevation data from the piezometers, TA-RP-5, and TA-SG-RC be collected during the first four months of full system operation. Additionally, the groundwater flow direction in the monitoring sections/transects should be compared and evaluated weekly in accordance with the March 31, 2022, ResAP. After the four months of weekly readings, EGLE and GZA can discuss an updated monitoring frequency for the remainder of the 2-year testing period dependent on system installation progress.

24. Section 6.0 Performance Monitoring Plan

EGLE does not believe there are a sufficient number of points of comparison proposed to adequately monitor the effectiveness of the interceptor system. Currently, there are only nine monitoring transects which span over 2,000 linear feet of trench system. Additional monitoring points are needed to prove that groundwater is being captured by the trenches, and additional screened depths are needed to monitor that groundwater is not flowing under the trenches. The existing monitoring well network may provide additional points for comparison and/or additional piezometers will be needed.

25. Section 6.0 Performance Monitoring Plan

Depth to water measurements should also be collected from all existing monitoring wells located between the trench and the Rogue River, in addition to the wells located along the monitoring transects. These additional depth to water readings should be collected at least every other week for the first 4 months of the trench system operation. After the four months, EGLE and GZA can discuss any changes that may need to occur in the frequency of collection of depth to water readings in these monitoring wells.

26. Section 6.0 Performance Monitoring Plan

Baseline groundwater elevation map(s), showing seasonal variations, should be provided for comparison as part of the performance monitoring plan.

27. Section 6.0 Performance Monitoring Plan

As part of the monthly progress reports, EGLE requests site-wide gradient maps and updated water budgets to show if groundwater is stagnating across the entirety of the facility.

28. Section 6.0 Performance Monitoring Plan

Based on the significant change in the type of interceptor system being proposed at the Tannery, EGLE does not believe that gradient measurements alone will be adequate information or lines of evidence to document and prove that the trench system is meeting the objective of the Consent Decree of “preventing PFAS Compounds from entering the surface water above water quality standards issued under Part 31.” Some type of targeted PFAS monitoring needs to occur to document that groundwater above criteria is not venting into surface water. This is especially important given the “highly heterogenous lithologies and hydraulic conductivities” encountered at the site as described by GZA in the Addendum Report.

29. Section 7.0 Groundwater Sampling

EGLE requests that non-boundary wells north and south of Rum Creek be sampled quarterly for two years as stated in the approved March 31, 2022, ResAP. North of Rum Creek these wells are PZ-1, PZ-2, PZ-3, TA-MW-306A, TA-MW-306B, TA-TMW-109, and TA-GW-02. South of Rum Creek these wells are TA-MW-3, TA-MW-304A, TA-MW-304B, TA-GW-06, TA-MW-303A, TA-MW-303B, TA-MW-303C, TA-MW-303D, TA-MW-302A, TA-MW-302B, TA-MW-301B, TA-MW-301C, TA-MW-301D, TA-GW-08, TA-MW-309A, TA-MW-309B, TA-MW-309C, TA-MW-309D, TA-TMW-103, TA-MW-1, TA-GW-04, TA-P-5, TA-MW-313A, TA-MW-313B, TA-MW-313C, TA-TMW-104, TA-MW-301B, TA-MW-301C, and TA-MW-301D.

30. Section 7.0 Groundwater Sampling

EGLE is clarifying that a long-term groundwater sampling plan must be included in the Completion Report for EGLE approval. As previously stated in EGLE’s February 10, 2022, Approval with Conditions Letter in point 6, *“EGLE requests that the monitoring wells identified on Table 15-1 that are currently identified as being tested annually, be tested quarterly during the duration of the two-year testing period. After the two-year testing period, a reduced sampling frequency could then be outlined in the long-term monitoring plan.”*

31. Section 7.0 Groundwater Sampling

Based on the design changing to a trench capture system, EGLE requests that all river piezometers installed as part of the performance monitoring also be sampled under the groundwater sampling program.

32. Section 7.0 Groundwater Sampling

Remove the following sentences from Section 7.0: *“As such, the hydraulic gradient between the Rogue River or Rum Creek and the extraction system will generally be small and groundwater velocity low resulting in few pore-water volume changes in years. It is unlikely that the constituent concentrations in the monitoring wells/piezometers will exhibit noticeable decreases in the short term; therefore, the annual sampling frequency is proposed in the long term.”*

EGLE does not agree with this statement since with the trench technology, there will be inward gradient and actual flushing of the pore water with river water over time for wells located between the trench and the Rogue River. As stated in EGLE's February 10, 2022, Approval with Conditions Letter, the long-term groundwater monitoring plan will be reviewed as part of the Tannery Completion Report.

This disapproval of the Tannery Interceptor System ResAP Addendum requires revisions and resubmittal to EGLE. The existing time limits for submittals in the March 31, 2022, Final Tannery Interceptor System ResAP will be replaced and superseded by new deadlines that must be contained in the required Revised ResAP and approved by EGLE. EGLE and Wolverine have been in discussions regarding the time limits in the March 31, 2022, Final Tannery Interceptor System ResAP and the need for appropriate new time limits to be included in the Revised ResAP. Those discussions satisfy the notice provisions in Paragraph 12.3 of the Consent Decree regarding verbal notice of potential delay and the written notice of obligations that may be impacted by delays in Paragraph 12.4 of the Consent Decree.

In recognition of the identified deficiencies that require significant work to be corrected in the requested Revised ResAP, the time limit for submission of the Revised ResAP including a schedule to supersede the March 31, 2022, Final Tannery Interceptor System ResAP shall be sixty [60] days from the date of this letter, which is May 9, 2023. EGLE notes that stipulated penalties can and will be accruing under the Consent Decree from the date of this disapproval until the revised submission is submitted and will be assessed if the revised submittal is not approvable. If EGLE is not provided an approvable resubmission, EGLE will demand payment of the stipulated penalties pursuant to Section XVII (Stipulated Penalties).

EGLE received 230 public comments during the public comment period for this Tannery Interceptor System ResAP Addendum, some of which have already been shared with GZA. EGLE is preparing a Public Responsiveness Summary document that will summarize and respond to the 230 public comments. EGLE will also hold another public comment period once Wolverine resubmits the Revised ResAP.

Although this report has been denied, Wolverine should continue to move forward with portions of the March 31, 2022, Final Tannery Interceptor System ResAP that are not proposed to change, including the pursuit of a Lakes and Streams permit, National Pollutant Discharge Elimination System (NPDES) permit, and the design of the treatment system.

The deficiencies identified in this letter are based on representations and information contained in the submittal. Therefore, additional supplementary information may be necessary to address the deficiencies identified above.

If you should have further questions or concerns, please contact the Project Manager, Leah Gies, at the Grand Rapids District Office at 616-215-4781, or at GiesL1@Michigan.gov; or you may contact me.

Sincerely,

Karen Vorce

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