

**Summary of Public Comments
and
Department of Environment, Great Lakes, and Energy (EGLE) Responses
to
Wolverine World Wide, Inc.'s (Wolverine) Proposed Response Activity Plan
for
Perimeter Monitoring**

Public Comment Period: September 24, 2020 – October 24, 2020

Commenter	Comment	EGLE Response
Richard R. Rediske (The Wolverine Community Advisory Group)	We have reviewed the Perimeter Monitoring Response Activity Plan by GZA/Wolverine and are concerned about the representation of the plumes on the maps being disconnected from the source at the Wolven Jewel Disposal Site (WJDS) west of Algoma near 11 Mile. We appreciate that the House St plume was redrawn to continuous PFOS+PFOA concentrations extending from the disposal site to south of the Rogue River. We again have similar concerns that the circled areas in Figure 1 are disconnected from the plume and gives the reader the impression that the contamination is not related to Wolverine's disposal activities and that the white areas are not contaminated or subject to future impact.	EGLE appreciates your analysis of GZA's isoconcentration figures which were submitted as part of Wolverine's Draft Perimeter Monitoring Response Activity Plan. EGLE shares similar concerns regarding the isoconcentration map interpretations/depictions being discontinuous which will be reflected in EGLE's review and response.
Richard R. Rediske (The Wolverine Community Advisory Group)	The CAG is concerned about the statement on page 2, "EGLE has alleged that there is a potential source area in the Wellington Ridge neighborhood where historic disposal of PFAS took place, but investigations have not revealed any physical evidence of a source." Wolverine is investigating this area as part of the Consent	EGLE shares similar concerns regarding the referenced statement on page 2, which will be reflected in EGLE's review and response. It is important to note that the area designated as the Wolven/Jewell source area was not a typical gravel "pit". It is a geologic feature called a "kame", in which the gravel was mined out of a topographic high, down to the current ground surface.

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	<p>Decree and the comment about an alleged source area is irrelevant. If PFAS containing wastes were dumped in a gravel pit that was subject to flooding and/or subsequent excavation, a source area with highly contaminated soils would not be present. We encourage EGLE to look at excavation records to determine if sites that used materials from the pit are also contaminated with PFAS.</p>	<p>The edge of the kame where mining stopped is still evident in the neighborhood today marked by a steep embankment. Therefore, any dumping or disposal activities would have occurred in the area that was already mined to the ground surface based on access for trucks, not the topographic high area that was still being mined down. Additionally, based on the age of the former gravel mining area, there are no records available to review.</p>
<p>Richard R. Rediske (The Wolverine Community Advisory Group)</p>	<p>We also disagree with the statement that “septic systems, rain deposition, and the use of domestic products that contain PFAS (Schaider et al, 2016; EGLE, 2019a; ITRC, 2020)” may be responsible for the area groundwater pollution on page 2 of each RAP. While Schaider et al. (2016) found PFAS compounds in a small sample of 20 shallow wells in Cape Cod, the highest concentration reported was 7 ng/l and a variety of other contaminants such as nitrate, boron, pharmaceuticals/personal care products cooccurred. ITRC (2020) discusses rain deposition which would be uniform across a broad area and not produce the plumes represented by GZA/Wolverine. The EGLE (2019a) reference also does not apply to this situation because the Robinson Township plume is in shallow groundwater and related to Fire Department usage.</p>	<p>Thank you for your insight into this specific paragraph in the Response Activity Plan and your review of the three references (Schaider et al, 2016; EGLE, 2019a; ITRC, 2020). EGLE will take this into consideration when commenting back to Wolverine. The Consent Decree defines Wolverine’s obligations and these obligations are not affected by the presence of other potential PFAS sources or lack thereof.</p>

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<p>Richard R. Rediske (The Wolverine Community Advisory Group)</p>	<p>The Wolverine CAG disagrees with comment on page 8, "Groundwater and residential well sampling completed since 2017 has identified two primary PFAS plumes within the WJSA." Based on recent presentations by EGLE, 4 plumes are clearly visible and intersect with the Rogue River.</p>	<p>EGLE also has comments regarding the referenced statement on page 8, which will be reflected in EGLE's review and response.</p>
<p>Richard R. Rediske (The Wolverine Community Advisory Group)</p>	<p>The Wolverine Community Advisory Group appreciates the opportunity to comment on this important workplan. At some point in the near future, we would like to receive a map with the location of all new GSI and groundwater workplan wells and the PFAS isoconcentration contours. Wolverine/GZA consistently presented the new wells on maps without PFAS contours so it was difficult for the public to tell how the locations relate to the plume dimensions. Different scales were used for the PFAS isoconcentration and perimeter well maps in this submittal and it was very difficult to see how these new wells related to plume boundaries.</p>	<p>Thank you taking the time to provide comments on this Response Activity Plan. The final Groundwater-Surface Water (GSI) Response Activity Plan is posted to the House Street website, at www.michigan.gov/belmont. EGLE also agrees that it is difficult to tell how the well locations relate to the plumes and the municipal water areas and will request that a figure similar to Figure 3 in the Consent Decree Appendix N Statement of Work is included in the final Perimeter Well Response Activity Plan.</p>