

To: Karen Vorce, Michigan Department of Environment, Great Lakes, and Energy

From: Richard R. Rediske, The Wolverine Community Advisory Group.



Re: Draft Response Activity Plans for groundwater investigations in the North Kent Study Area Comments

Date: September 10, 2020

The Wolverine Community Advisory Group (CAG) represents concerned citizens that have been impacted by PFAS contamination originating from the Wolverine World Wide Tannery in Rockford, Michigan. We have reviewed the Draft Response Activity Plans for groundwater investigations at Areas 5, 6, 11/12 and 19 by GZA/Wolverine and are concerned about the representation of the plumes on the maps being disconnected from the source at the House Street Disposal Site (HSDS) and Wolven Jewel Disposal Site (WJDS).

The CAG is concerned about the GZA/Wolverine implication that plumes, especially on the opposite sides of rivers adjacent to plumes, are unrelated to Wolverine contamination. More specifically, the statement that “septic systems, rain deposition, and the use of domestic products that contain PFAS (Schaidler et al, 2016; EGLE, 2019a; ITRC, 2020)” may be responsible for the area groundwater pollution on page 2 of each RAP. While Schaidler et al. (2016) found PFAS compounds in a small sample of 20 shallow wells in Cape Cod, the highest concentration reported was 7 ng/l and a variety of other contaminants such as nitrate, boron, pharmaceuticals/personal care products cooccurred. ITRC (2020) discusses 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.

The maps presented in the RAPs give the reader the impression that separate, smaller/contained contamination areas exist rather than continuous plumes from the source areas. While there may be minor contributions from other sources in investigation areas, we feel these statements are misleading, as groundwater data support that the disposal of industrial waste by Wolverine at the HSDS and WJDS is primarily responsible for contamination of the aquifers in the Response Activity Plan areas. **In the absence of exculpatory data clearly indicating other sources, GZA/Wolverine should either remove these statements, or supplement them to indicate that Wolverine could also be the source and that the true source can be determined only after further investigation.** If Wolverine desires to avoid a potential admission of liability in areas of uncertain contamination sources, it could explicitly state that it is “investigating pursuant to the Consent Decree without any admission of liability” rather than creating the impression that non-Wolverine sources are the underlying cause of the contamination in these areas. The data simply do not support such an implication.

We are especially concerned about areas 11 and 12 as GZA/Wolverine is stating that the HSDS plume does not pass beneath the Rogue River near Area 12 (page 7, paragraph 1). The Plainfield Township water supply wells are located on the opposite side of the Grand River from Area 11 and contain low levels of PFAS. We feel that the Response Activity Plan for Area 11 and 12 should specifically address the possibility that the Wolverine plume is migrating under the Rogue River and, if so, whether it has an influence on the Plainfield Water Supply Wells.

The Wolverine Community Advisory Group appreciates the opportunity to comment on these important workplan. We understand that groundwater investigations are conducted in phases and request that future phases may be needed to address how the PFAS plumes interact with the Rogue River near Area 12 and if the plume in Area 11 is fully intercepted by the Grand River.