

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHER
DIRECTOR

May 31, 2018

VIA E-MAIL AND U.S. MAIL

Mr. Dave Latchana Wolverine World Wide, Inc. 9341 Courtland Drive, NE Rockford, Michigan 49341

Dear Mr. Latchana:

SUBJECT:

House Street Disposal Area - Wolverine World Wide, Inc. (Wolverine) Per- and Polyfluoroalkyl Substances (PFAS) Response to "Draft Removal Work Plan for House Street Disposal Area, Plainfield Township, Kent County, Michigan: Approval with Significant Modifications dated April 19, 2018" hereafter named "Extent of Contamination Study Removal Work Plan, House Street Disposal Area, Plainfield Township, Kent County, Michigan" dated May 18, 2018

Since the beginning of 2018, the Department of Environmental Quality (DEQ), Remediation and Redevelopment Division has worked closely with the United States Environmental Protection Agency, Region 5 (USEPA) to coordinate activities at the House Street Disposal Area, at 1855 House Street, Belmont, Michigan.

As part of that direct collaboration, the DEQ has reviewed the document titled "Draft Removal Work Plan for House Street Disposal Area, Plainfield Township, Kent County, Michigan: Approval with Significant Modifications dated April 19, 2018" submitted to the USEPA as required under the January 10, 2018, Unilateral Administrative Order from the USEPA to Wolverine and has the following requirements for the upcoming on-site investigations:

1. For every sample collected by Wolverine as part of the "Extent of Contamination Study Removal Work Plan, House Street Disposal Area, Plainfield Township, Kent County, Michigan" targeting contaminants of concern as defined by the USEPA, an additional sample will be collected for PFAS analysis at the same interval and location and for all media for incorporation into Wolverine's ongoing investigation and analysis of PFAS in the vicinity of the House Street Disposal Area. This requirement will apply to all soil, groundwater, and waste samples. This data will provide a baseline to determine the scope of the PFAS impact to the soils and groundwater on the House Street property. Once the data is compiled and incorporated into the Conceptual Site Model by Wolverine, the DEQ can determine if additional information is needed to fully assess the risks posed by the House Street facility. This analysis is part of the investigation and response actions that the DEQ seeks under the pending Complaint and the DEQ will incorporate these sampling and analysis requirements into the eventual framework governing Wolverine's compliance with Michigan law.

- Provide a Work Plan to the DEQ which clearly identifies the anticipated boring locations, monitoring well locations, and other investigative activities as required by the "Extent of Contamination Study Removal Work Plan, House Street Disposal Area, Plainfield Township, Kent County, Michigan." This work plan should include:
 - a. A copy of the final approved "Extent of Contamination Study Removal Work Plan, House Street Disposal Area, Plainfield Township, Kent County, Michigan" as provided to the USEPA on May 18, 2018.
 - b. All existing PFAS sampling data collected to date compiled into appropriate tables, maps, figures, and cross-sections.
 - c. A current PFAS isoconcentration map for all on-site monitoring wells.
 - d. All other relevant PFAS information associated with the House Street Disposal Area.

The DEQ is expecting implementation of PFAS sampling to be conducted concurrently with the data collection identified in the "Extent of Contamination Study Removal Work Plan, House Street Disposal Area, Plainfield Township, Kent County, Michigan." Since the USEPA has mandated that the assessment activities begin the week of June 4, 2018, the DEQ is requesting that the items described in Paragraph 2.a and 2.b be submitted by June 8, 2018 and that the items described in 2.c and 2.d be submitted no later than June 30, 2018.

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

Sincerely.

Abigail Hendershott
District Supervisor

Remediation and Redevelopment Division

igail Hendershott

Department of Environmental Quality

616-888-0528

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cc: Ms. Carol Isaacs, Governor's Office

Mr. Scott Hiipakka, Governor's Office

Ms. Polly Synk, Department of Attorney General

Ms. C. Heidi Grether, Director, DEQ

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Ms. Amy Peterson, DEQ

Mr. Mike Jury, DEQ

Mr. David O'Donnell, DEQ

Ms. Lisa Agosta, DEQ