

Michigan Department of Environment, Great Lakes, and Energy
Wolverine CAG – Draft Tannery Interceptor System Response Activity Plan

The Wolverine Community Advisory Group (WCAG) is comprised of concerned citizens that have been impacted by PFAS contamination from the Wolverine World Wide (WWW) Tannery (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 Draft Tannery Interceptor System Response Activity Plan (Interceptor Plan) by Wolverine World Wide (WWW), Inc. The Interceptor Plan was submitted as a requirement of the Consent Decree (CD), effective February 19, 2020, presented for public comment on April 22, 2021.

The Interceptor Plan is based on pump tests, modeling and complex calculations and modeling. As an important qualification to the WCAG's review is that we lack the resources to adequately verify WWW's modeling and design calculations. As a result, we encourage EGLE and their contractors to fully review and verify all the modeling and calculations used by GZA to design the extraction well and treatment system. That said, it appears as though the proposed Interceptor System should eventually extract and effectively treat the flow of contaminated groundwater from beneath the former Tannery into Rogue River surface water. This will involve a documented process of balancing the system so that it will effectively capture contaminated groundwater, while not pulling significant Rogue River surface water into the treatment units. The effectiveness of the extraction wells should also be monitored to ensure that they are placed with overlapping extraction zones, to prevent contaminated groundwater from continuing to impact the Rogue River.

Since verification is such an important element of the interceptor system, our primary concerns are related to the lack of any documented performance monitoring of the plume and the Rogue River to determine the effectiveness of the treatment system. More specifically, the Groundwater Monitoring Plan described in Section 11 discusses the use of piezometers to monitor water elevations to demonstrate compliance. In it, WWW appears to reject performance monitoring by stating in the last sentence that, "... The monitoring program will not include groundwater sampling." We find the Groundwater Monitoring Plan described in Interceptor

System document to be inadequate. In addition, it is inconsistent with the requirement of the Consent Decree (CD), which states, "... The system expansion shall be appropriately sized to address and control PFAS compounds contamination in groundwater at the Tannery before it enters the Rogue River." While the piezometers will show drawdown of the water table at specific points, the most direct and effective way to monitor system performance is through testing of compliance wells down gradient of the extraction system and monitoring of PFAS loading

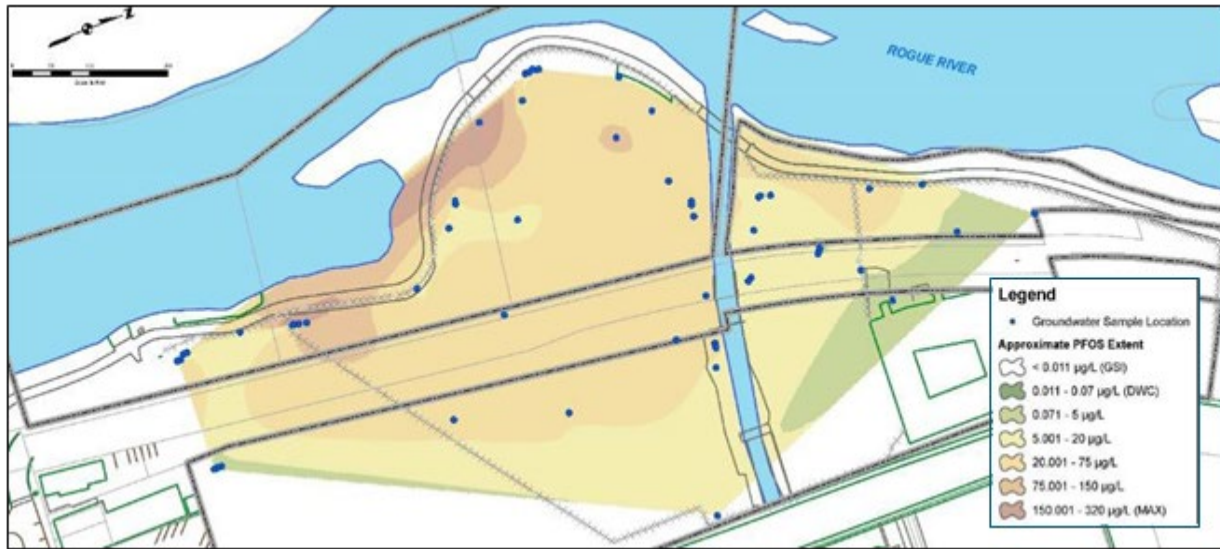


Figure 1. Groundwater concentrations of PFAS at the WWW Tannery site (Figure 2.3 from Tannery Interceptor System Response Activity Plan).

reductions in the Rogue River and Rum Creek. The extent of PFAS contamination in the groundwater is shown in Figure 1 and the location of the proposed extraction wells are shown in Figure 2. Based on these figures, there are existing monitoring wells that can be sampled or new ones that can be installed in the area between the extraction well array and the Rogue River that can be used to monitor and ensure compliance with CD requirement to "address and control PFAS compounds contamination in groundwater at the Tannery before it enters the Rogue River."

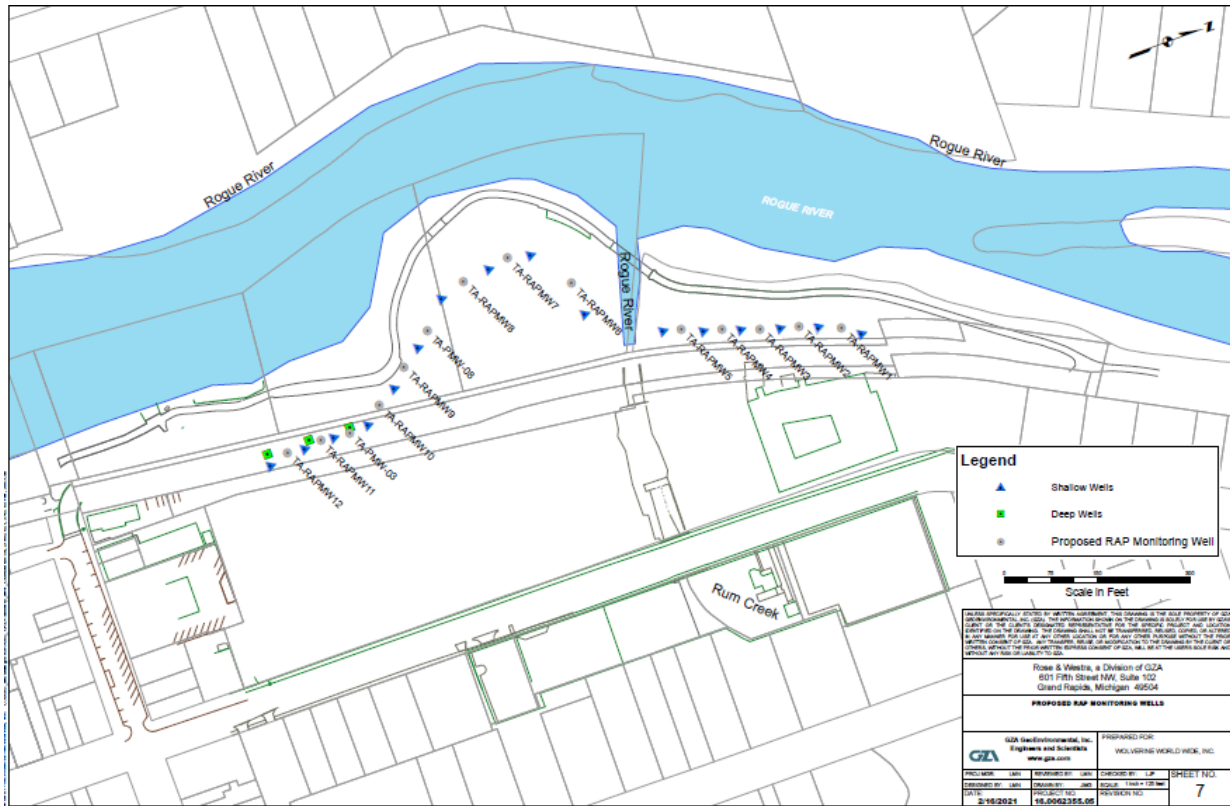


Figure 2. Location of the extraction wells.

In fact, 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, calculate the loading of PFAS compounds in the river. If the treatment system is effective, there should be no increase in loading between and up and down gradient sampling locations.

We recommend that Rum Creek be returned to its natural state and the cement culvert that encloses the creek be removed to improve fish passage and habitat. The cement enclosure is not an acceptable remedy to keep contaminated groundwater from entering Rum Creek and we recommend that alternative solutions be considered including adding additional extraction wells and/or a barrier system with a natural stream bottom. We also recommend that Rum Creek be sampled and tested in a similar manner, as it is a tributary of the Rogue River and a known loading source of PFAS to the Rogue River. Failure to sample for continued groundwater impacts to surface water could result in continued contamination and adverse impacts in spite of the

Interceptor Plan. For example, the recreational use of the Rogue River continues to be impacted by PFAS foam, and there are PFAS fish consumption advisories for the Tannery area and the impoundment in Rockford. The verified control of the PFAS plume from the WWWW Tannery is a critical part of restoring these damages to the natural resources provided by the Rogue River.

Conclusion

The Wolverine Community Advisory Group appreciates the opportunity to comment on the Draft Tannery Interceptor System Response Activity Plan. It is critical that the PFAS contamination at the WWWW Tannery be managed in a manner that greatly reduces the documented flow of PFAS contaminated groundwater into the surface waters of the Rogue River. The proposed measurement of groundwater elevations alone provides no verification that the Tannery Interceptor System meets the goals outlined in the CD. Only the monitoring downgradient wells and the Rogue River will provide verification that this requirement has been achieved. WCAG requests that WWWW provide a groundwater and surface water plan that verifies the requirements of the CD are achieved and that we have the opportunity to review and comment on the revised compliance monitoring plan when it is provided.

Sincerely,



Richard R. Rediske, Ph.D.
Leadership Team
Wolverine Community Advisory Group