

**Summary of Public Comments  
and  
Department of Environment, Great Lakes, and Energy (EGLE) Responses  
to  
Wolverine World Wide’s Proposed  
House Street Property Work Plan – Final Remedy  
Public Comment Period: June 9, 2022 – July 31, 2022**

<b>Commenter</b>	<b>Comment</b>	<b>EGLE Response</b>
<p>Denise Trabbic-Pointer, Sierra Club – Michigan Chapter</p>	<p>I am a retired career EHS professional that is extremely concerned about the historic, current, and future impact of the House Street Property (HSP) on people, ecosystems, and the environment. I retired in January 2019 after 42 years with DuPont and a spin-off company, Axalta Coating Systems, as their Global Environmental Competency Leader. I am a Chemical Engineer with a BS and MS in Hazardous Materials Management. Since May 2019, I have been the Sierra Club – Michigan Chapter, Toxics &amp; Remediation Specialist.</p> <p>I have reviewed the Work Plan – Final Remedy, House Street Property, submitted by GZA on behalf of Wolverine Worldwide, Inc. for the House Street Property in Kent County. The following are specific comments and major issues determined from my review:</p> <ol style="list-style-type: none"> <li>1. GZA, on behalf of Wolverine Worldwide, Inc. (Wolverine), has assessed that an air permit is not required for the planned work at the House Street Property (HSP). They do plan to implement a Fugitive Dust Management Plan and to have perimeter and other direct reading equipment at the work site during excavation activities (Section 4.1 of the Engineering Report).</li> </ol> <p>One of the primary concerns for the community is that emissions of contaminants that are present in waste, soil, vegetation, and trees at the</p>	<p>Thank you for sharing your concerns regarding the proposed House Street Final Remedy Work Plan. EGLE’s responses below are numbered in alignment with the numbered concerns identified in your comment.</p> <ol style="list-style-type: none"> <li>1. After consulting with the Air Quality Division, it has been determined that a Permit to Install (PTI) is not required for this project. Rule 201 of the Air Pollution Control Rules requires a PTI for the installation, construction, reconstruction, relocation or modification of</li> </ol>

Commenter	Comment	EGLE Response
	<p>HSP, will increase during the work in spite of the proposed protective measures mentioned above. An air permit or other more structured document that includes terms &amp; conditions specific to the HSP is needed. While the Engineering Report provides action limits for worker breathing zones, there are no definitive or stated limits in the Work Plan (WP) for organic vapor or particulate matter (PM) that might reach community receptors. Even if the perimeter PM monitoring devices are set to alarm at specified PM levels, there are no assurances and no data provided that assures contaminated PM won't accumulate in homes, on surfaces surrounding the homes, cars and/or lawn and garden surfaces. To be clear, methane and nonmethane Landfill Gas Emissions are not our primary concern. It is the potential for PFAS and other contaminants that are absorbed and entrained in the particulate matter (PM) at the HSP and that can become airborne and carried high in the air long distances to ultimately settle. Without even an opacity requirement or perimeter screening level assessed, how will the community know that they are protected?</p> <p>I do not agree that the proposed work is exempt from permitting and believe that GZA has not properly completed a full assessment of all applicable requirements pursuant to R 336.1201. The following are specific challenges to GZA conclusions. I encourage the EGLE oversight team to contact AQD resources to review my argument and disputes to GZA's conclusions.</p> <ul style="list-style-type: none"> <li>• This work involves emissions of air contaminants and is therefore subject to R 336.1201. The likely emissions from the proposed Work Plan include dust and toxic air contaminants.</li> <li>• GZA states that Pursuant to R 336.1212(g) temporary activities related to the construction or dismantlement of ..., earthworks, or other structures, and R 336.1212(k) Construction, repair, and maintenance of roads or other paved or unpaved areas, are insignificant activities and do not require a PTI. <ul style="list-style-type: none"> <li>○ <b>Rule 212 applies to insignificant activities at a stationary source that need not be included in an</b></li> </ul> </li> </ul>	<p>any process or process equipment. The definition of these regulated activities does not include earth moving. Therefore, a PTI is not required for that work. For the tree grinding activities, the PTI exemption Rule 285(2)(gg) for "chipping, flaking, or hogging wood or wood residues that are not demolition waste materials" applies. None of the Rule 278 exclusions prevent the use of this exemption. EGLE is asking that the vegetation chipping activities be addressed in the Fugitive Dust Plan and proper wetting controls be used.</p> <p>A Fugitive Dust Plan will be implemented to minimize dust/particulate emissions from working areas and roadways per Appendix C of the Work Plan. If residents believe they are being impacted from dust moving offsite, they should contact EGLE at 616-356-0500 and the Air Quality Division can determine if additional dust control measures are necessary. The project must still comply with all applicable air quality rules and regulations.</p>

Commenter	Comment	EGLE Response
	<p>administratively complete application for a renewable operating permit. GZA/Wolverine are not applying for a renewable operating permit and therefore the fact that these activities are insignificant pursuant to Rule 212 is irrelevant. Furthermore, the proposed work at the HSP is not normal construction or earthworks that will create only particulate matter (PM) emissions. Organic vapor may be emitted, and PM emissions may contain one or more toxic air contaminant(s), including PFOA and PFOS. The work being proposed is also not just “earthworks” or “road maintenance”. There will be a potential for organic vapor emissions during excavation and movement of waste as described in the WP. There will also be significant PM emissions from clearing, grubbing, and chopping up trees and brush to move and lay under the cap. These trees and surrounding vegetation are likely impacted by underlying contaminants, including PFAS and WP activities are likely to cause PM to become airborne.</p> <ul style="list-style-type: none"> <li>• GZA also states that R 336.1285(aa) exempts landfills and associated flares and leachate collection and handling equipment from obtaining a PTI. Similarly, Rule 285 (336.1285(gg)) exempts equipment used for chipping, flaking, or hogging wood or wood residues that are not demolition waste materials. <ul style="list-style-type: none"> <li>○ <b>Our concerns about the proposed Work Plan have nothing to do with flares, leachate collection, or the handling equipment. The trees and vegetation that will be cleared and chipped in this project is likely contaminated with constituents from underlying waste and soil, including PFAS. It is the PFAS in the PM/dust associated with the process of excavating, moving, and chipping that is of greatest concern to the nearby community. The fact that the trees and vegetation are not demolition waste materials does not negate the real possibility that it will emit</b></li> </ul> </li> </ul>	

Commenter	Comment	EGLE Response
	<p style="text-align: center;"><b>hazardous constituents when it is chopped up. The equipment used for chipping and resulting emissions should not be exempted from permitting for these stated reasons</b></p> <ul style="list-style-type: none"> <li>• We do agree with GZA that the proposed WP is not excluded from exemption pursuant to R 336.1278 for the stated reasons. That is, we agree that this project is not a new major source of hazardous air pollutants (HAP) nor is it subject to prevention of significant deterioration (PSD) of air quality regulations or new source review (NSR) for major sources in nonattainment areas.</li> <li>• GZA stops at this point and states that an air permit is not required but, because the WP emission sources passed R 336.1278, they should have continued with assessing the applicability of R 336.1290. All potential emissions of toxic air contaminants (TAC) from WP activities must be assessed against listed screening levels. Two of the potential emissions that must be assessed include PFOS and PFOA.</li> <li>• In addition to PFAS, there are concerns with the numerous Volatiles, Semi-Volatiles, General Chemistry Constituents, and Metals above criteria in waste materials and soil as detailed in the <i>HSDS Implementation of 2018 Work Plan Summary Report</i>, filed May 21, 2019. <ul style="list-style-type: none"> <li>○ <b>All of these compounds must be reviewed for applicability to Rule 290.</b></li> </ul> </li> </ul> <p>2. EGLE stressed during the June 2022 public meeting that the community should feel free to contact the EGLE Air Quality Division (AQD) with any concerns during the project. If there is or is not a permit, local residents need to have some type of criteria for knowing whether PFAS and/or particulate matter (PM) emissions near their residence remains below acceptable levels throughout the project. The high-volume particulate and organic vapor monitors should be placed in strategic locations near the perimeter of the work site. Toxic air contaminant (TAC) screening</p>	<p>2. EGLE shares your concern that fugitive dust should not leave the House Street Property. The current Air Quality Division screening level for PFOS and PFOA are protective regardless of the phase of the substances (vapor or particulate matter). Based on the known soil and waste sample results, the</p>

Commenter	Comment	EGLE Response
	<p>levels should be used as criteria for organic vapor monitor set-points. Regular updates on readings from perimeter monitors should be provided to the community. If residents observe a buildup of dust in their homes and automobiles or if they observe visible clouds from the worksite, they will need easily accessed, pre-determined mechanisms to report and preferably, a person to call to report the issue.</p> <p>The residents near the HSP have already had to live with unknown exposures from impacted drinking water. Unpermitted emissions of PFAS-impacted particulate matter only adds insult to injury. In the June 15, 2022, EPA announcement regarding the new health advisory levels for PFAS, EPA Administrator Michael Regan said, “People on the front-lines of PFAS contamination have suffered for far too long. That’s why EPA is taking aggressive action.” The HSP is a situation that requires aggressive action in order to assure that all potential exposures have been considered and mitigated.</p> <p>3. Operation, Maintenance, and Monitoring (OM&amp;M) plans such as a surface water management plan, a post-closure maintenance and monitoring plan, and an environmental monitoring plan were reportedly prepared but not shared as part of the Work Plan. These Plans are critical to the on-going maintenance and security of the HSP. An opportunity for public review and comment should be provided.</p> <p>4. The Work Plan makes mention that the surface water directed to the retention basin might “possibly [be] pumped or directed to the eastern wooded portion of HSP and allowed to naturally infiltrate in an area not previously used for waste disposal.” What measures are planned to assure that the surface water being pumped to an uncontaminated portion of the HSP is not impacted, particularly following initial project activities? The WP mentions that the Cap Option will limit infiltration through the waste and soil with waste material but that “infiltration will still</p>	<p>screening levels are not anticipated to be exceeded. The EPA has proposed new health advisory values, but these are not final. Organic vapor monitoring and dust monitoring will be conducted at fixed points along the House Street Property boundaries. EGLE has requested that the boundary air monitors will collect samples for PM10 to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) for PM10 of 150 µg/m3 (24-hour).</p> <p>3. A post-construction Monitoring Plan was included in the Work Plan as Appendix D and reviewed by EGLE. A long-term OM&amp;M Plan will be submitted for EGLE approval in the Completion Report upon completion of the Work Plan activities.</p> <p>4. Based on the design of the surface water ponds, water that infiltrates the cap will not be collecting in the ponds. The ponds are designed to collect runoff from across the cap surface</p>

Commenter	Comment	EGLE Response
	<p>occur”. Portions of the WP where surface water infiltration to uncontaminated portions of the HSP is planned must take this limitation into account. Surface water should be sampled and analyzed prior to discharging or infiltrating to groundwater. Doing so would be consistent with a September 23, 2020 document <i>GSI Response Activity Plan, Kent County, Michigan</i>, Section 7.0 INVESTIGATION DERIVED WASTE where GZA states: “For locations where PFAS concentrations are unknown or known to exceed Part 201 GRCC, the water will be disposed of appropriately in accordance with the EGLE interoffice communication regarding purge water disposal from well sampling and development (EGLE, 1999), and not discharged to the ground surface.”</p> <p>5. An approved “Site Water Management Plan” is referenced in several locations of the WP. Is this the same as the surface water management plan mentioned above? If it is different, an opportunity for public review and comment should be provided.</p>	<p>that will not come in contact with the waste material. Water that infiltrates through the cap and into the waste materials below will continue to infiltrate down into the groundwater.</p> <p>5. The Site Water Management Plan will describe the handling and control of water on-site during various stages of construction activities. In context, it will provide the plans and procedures to address (1) stormwater runoff, both from contact with “non-contaminated” areas and “contaminated” areas; (2) water (if encountered) in excavations; (3) water used on-site for dust control and for street cleaning; and (4) water that may need to be pumped from the retention basin, if needed, in extreme weather conditions. This plan will be prepared by Wolverine’s selected contractor as part of bid preparation process. The Site Water Management Plan will not be subject to public comment or EGLE’s approval, however, it will be prepared in accordance</p>

Commenter	Comment	EGLE Response
	<p data-bbox="485 272 1478 773">6. As mentioned above, the Cap Option will limit infiltration through the waste and soil with waste material but “infiltration will still occur”. Capping will also do nothing to remediate the existing contaminated groundwater (GW) plume, continuing to allow contaminated GW to move further away from the HSP, to be a possible source for volatilization to indoor air in homes and businesses and for GW contaminants to ultimately enter surface water systems, namely, the Rogue River. The remedy should include recommendations for ongoing discussions with the community on how Wolverine intends to stop impacted groundwater from discharging to the Rogue River. Remedial options should continue to be aggressively assessed, including on option to add extraction wells and pump and treat systems to stop groundwater movement well upstream from reaching the Rogue River. Placement of extraction wells near HS-MW-18 and/or HS-MW-20 would appear to be effective locations and this option should be explored for immediate implementation.</p> <p data-bbox="531 813 1465 971">The community has consistently expressed their preference to cap the most highly impacted areas at the HSP and to control and treat groundwater. Groundwater transport of PFAS and other contaminants to the Rogue River remains a concern under the proposed Work Plan and must be addressed.</p>	<p data-bbox="1650 175 1940 233">with the Final Remedy Work Plan.</p> <p data-bbox="1602 272 2011 1040">6. EGLE is also concerned about the ongoing groundwater threat from the House Street property. Impacted groundwater discharging to the Rogue River is covered by the Groundwater Surface Water Interface (GSI) Response Activity Plan. The State retains the right to seek Natural Resource Damages from Wolverine if Wolverine fails to complete all necessary response activities for the GSI pathways in work plans approved by EGLE and if they fail to address PFAS contamination that is identified as venting into the Rogue River above applicable criteria.</p>
<p data-bbox="121 1083 348 1276">Richard R. Rediske, Ph.D on behalf of the Wolverine Community Advisory Group</p>	<p data-bbox="388 1083 1461 1404">The Wolverine Community Advisory Group (WCAG) represents concerned citizens that have been impacted by PFAS contamination from the Wolverine World Wide Tannery 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. We are responding to the House Street Property Work Plan – Final Remedy (FR) submitted by GZA on behalf of Wolverine World Wide (WWW), Inc. The Work Plan was submitted as a requirement of the Consent Decree on April 26, 2022 and revised on May 26, 2022. The WCAG’s review of the FR and recommends the work plan be rejected due to significant</p>	<p data-bbox="1507 1083 1990 1240">Thank you for sharing your concerns regarding the proposed House Street Work Plan. EGLE’s responses below align with the headers from your comment.</p>



Commenter	Comment	EGLE Response
	<p>issues related to air quality, fugitive dust, landscaping, and monitoring. Our concerns are summarized below. Since the FR document does not follow a logical numbering system, our comments reference the actual number in the combined PDF.</p> <p><b>Air Quality</b></p> <p>Our air quality concerns are related to the landfill gas calculations, PFAS air emissions from vented landfill gas, and the lack of a fugitive dust control plan. GZA states in section 4.4 (p 11) that the site contains “49,000 cubic yards (CY) of organic waste and soil with waste materials is estimated to be approximately 34,000 CY for a total estimated volume of 83,000 CY. Additionally, the site vegetation removed during construction will be placed under the caps as described in the FS.” The air emission calculations for methane by GZA for a Major Source permit (Section 41. p 8) did not include the new organic waste stream they will generate by clear cutting, grubbing, and grinding the site vegetation on 40 acres (Section 4.2.1.4 p 36). The average weight of timber from clear cutting is 87 tons/acre (1)<sup>1</sup>. We estimate that the House Street site contains at least 50 tons/acre due to less tree density plus additional material from grubbing (removing stumps, vegetation, and roots) that will result in more organic matter than just clear cutting. For the 40 acre site, we estimate that clear cutting and grubbing will generate 2,000 tons or 8,000 cu yds of methane producing vegetation waste. It should be noted that yard waste is banned from landfill disposal in Michigan. We request that the Air Quality conduct an independent review of the air emissions of existing and new waste added to see if the disposal site will require permitting as a Major Source.</p> <p>GZA opined extensively about the ability of trees to accumulate PFAS by phytoremediation in their Phyto-Cap alternative for House St (February 19, 2021). Undoubtedly, the trees and vegetation along with the contaminated site soil attached to the stumps and roots will contain PFAS. Consequently, the new waste stream GZA omitted from the methane calculations will also contain PFAS. Since PFAS from the new wood and plant waste plus the existing site waste can be degraded</p>	<p><b>Air Quality</b></p> <p>According to the Air Quality Division, the capped landfill will not be subject to regulations based on the estimated landfill gas emissions. Emissions of Non-Methane Organic Compounds (NMOC) as well as all other regulated pollutants will be below Major Source applicability thresholds (34 tons per year of NMOC).</p> <p>A Fugitive Dust Plan will be implemented to minimize dust/particulate emissions from working areas and roadways (see Appendix C of the Work Plan). The Fugitive Dust Plan will be overseen by the Air Quality Division under Air Pollution Control Rule 37I. If the need for modification of the plan should arise, the Air Quality Division has the authority to do so.</p> <p>Volatile PFAS degradation compounds are at least ten times less toxic than PFOS or PFOA. The duration and intensity of volatile PFAS degradation</p>

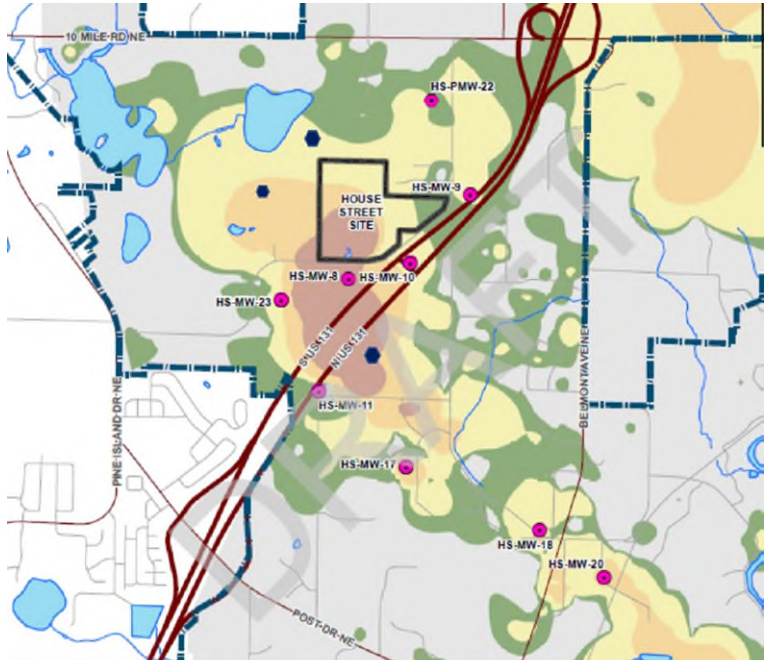
<sup>1</sup> (<https://www.forest2market.com/blog/how-many-tons-of-wood-are-on-an-acre-of-land>)



Commenter	Comment	EGLE Response
	<p>and be volatilized in landfill gas emissions (2)<sup>2</sup>, we request that the Air Quality Division review the site for the potential of PFAS air emissions.</p> <p>A Fugitive Dust Control Plan is mentioned in several sections and described as being implemented on haul roads (p 8), that on-site water truck will be available to minimize visible dust (p 35), and covers and water spray will be used to control dust during clearing, grubbing and waste material relocation during dry, windy weather conditions (p 36). The only monitoring mentioned was on p 133: “Dust suppression (watering) will be done at the excavation face, when moving overburden soils into the waste mound area, and when constructing the perimeter berms and/or earthwork layers of the mound cap to reduce sustained particulate levels to below 2 mg/m3.” There is no mention of fugitive dust monitoring along the property perimeter during site grubbing or during construction of the cell. Michigan has a screening value of 0.07 µg/m3 for PFOS + PFOA which is based on the vapor phase. It is well documented that PFAS adsorbs to fine soil particles, including clays and organic matter. If PFAS is associated with dusts generated from excavating and grubbing contaminated soils, the PFAS threshold is 28,000x lower than the general particulate threshold GZA is using of 2 mg/m3. Given the fact that the project schedule (p 16) estimates vegetation removal to start 30 days after receipt of permits, a 6 mo bid and award period will occur after permits, and the construction period will 30 months, 40 acres of soil will be exposed on the site to wind erosion for 1 – 2 years. This site needs perimeter and neighborhood particulate monitoring and a detailed plan to limit fugitive dust emissions for 40 acres of bare soil and the piles of grubbed wood waste. Since irrigation wells are not permitted due to PFAS contamination, GZA will need to either cover large areas of soil with Erosion Control Blankets or bring in irrigation water. This site requires a detailed Fugitive Dust Control Plan to minimize wind erosion on a large scale and a particulate monitoring program to document that the neighborhood is protected from air emissions above 0.07 µg/m3 of PFOS + PFOA. Fugitive dust emissions can be carried into homes and get trapped on furniture and carpets. Children have extensive hand to mouth activity and can be exposed to higher fugitive dust levels than adults. GZA felt in their Phyto Cap Plan (2/19/21; pgs 23 and 25) that 2 ft of soil was needed to cover most of the disposal area so there would be “no exposure to residual contamination</p>	<p>products are not expected to result in health concerns.</p> <p>The Fugitive Dust Plan has a PM10 air sampling component (see Appendix C). The concentrations of PFAS expected to be in the dust from excavating and grubbing are much lower than the air quality standard for PM10; therefore, compliance with the dust plan is anticipated to be health protective for both general effects of dust and any PFAS contamination contained within that dust.</p> <p>Dust control and dust suppression is of utmost importance. EGLE has provided comments to Wolverine pertaining to adequate dust suppression and control and additional details that need to be included in the plan. Additionally, SESC permits limit the amount of land that can be cleared or disturbed at one time, due to erosion and dust concerns, so the work completed at the site will also need to follow those permit requirements. Erosion and dust controls must be put in place on the area that was disrupted before moving to a new area.</p>

<sup>2</sup> PFASs) in landfills. Environmental Pollution, 235, 74-84. and Stoiber, T., Evans, S., & Naidenko, O. V. (2020). Disposal of products and materials containing per-and polyfluoroalkyl substances (PFAS): A cyclical problem. Chemosphere, 260, 127659.)

Commenter	Comment	EGLE Response
	<p>will be present onsite.” How will the neighborhood be protected when all the vegetation is removed, the roots and stumps pulled up and grubbed, and the area kept free of vegetation while waiting for construction? We also must remember that the EPA has recommended lowering the Chronic Reference Dose for PFOA to 1.5E-9 mg/kg/d to protect children from immunosuppression (<a href="https://www.epa.gov/system/files/documents/2022-06/technical-factsheet-four-PFAS.pdf">https://www.epa.gov/system/files/documents/2022-06/technical-factsheet-four-PFAS.pdf</a>). We request that a detailed monitoring and dust control plan that includes continuous perimeter air monitoring at a threshold of 0.1 mg/m<sup>3</sup> be submitted to the Air Quality Division for review and approval. A plan to limit worker exposure to PFAS levels of &gt; 0.07 µg/m<sup>3</sup> for PFOS + PFOA also needs to be developed and submitted to MIOSH for review.</p> <p><b>Landscaping</b></p> <p>The FR was revised to include a rendering of the site and views from the south and west. The FR still lacks a Landscape Plan that discusses what types of trees and spacing will be used, how the landscaping will be maintained, and if replacement trees will be added needed. We request a formal Landscape Plan be submitted for the review by the WCAG and the House Street Neighborhood that includes more than renderings and provides details on setbacks, layout, and maintenance. We understand there is a difference of opinion concerning whether this House St is regulated as a new site because of the generation of a new PFAS waste stream from grubbing or if it is classified as an old site and does not need a higher level of buffering and setbacks. Regardless of this difference, the WCAG and House Street neighborhood would like to see a landscaping plan that provides adequate buffering so that the site does not serve as a highly visible and constant reminder of a toxic waste dump in the community.</p> <p><b>Monitoring</b></p> <p>The Monitoring Plan included in the FR is inadequate. GZA states on page 36 that “There will be a short-term increase in runoff and infiltration during construction when vegetation is removed.” Based on the GZA timeline presented on page 16, the House Street Site will be stripped of protective vegetation and will have increased infiltration and PFAS waste leaching for a period of at least 1 - 2 years while grubbing is started and construction is completed. GZA proposes on page 351 that baseline PFAS groundwater sampling be completed within six months of</p>	<p><b>Landscaping</b></p> <p>As required by Part 115, it is understood that the landscaping plan will provide for sufficient vegetation to ensure the integrity of the cap while also providing a natural barrier along select House Street Property boundaries for visual screening purposes.</p> <p><b>Monitoring</b></p> <p>The effectiveness of the cap will be evaluated during construction in accordance with the Construction Quality Evaluation (Section 5.3.2 of the CQA Plan). Additionally, the SESC permit will dictate the amount of</p>

Commenter	Comment	EGLE Response
	<p>construction completion and one follow-up groundwater sampling event one year following the baseline event be conducted. We find this strategy flawed and baseline PFAS monitoring should start prior to vegetation removal as there will be a significant increase in infiltration and leaching of PFAS from the site upon vegetation removal. The GZA monitoring plan may show a decrease in PFAS concentrations between the annual events due to the change in infiltration from vegetation removal and capping. The effectiveness of the cap must be compared to pre-construction conditions.</p> <p>The proposed monitoring plan (p 356) has no wells to the north and west of the site and only one well in the concentrated area of the plume. We recommend that three new wells be added</p>  <p>Figure 1. Proposed additional monitoring wells (black)</p> <p>and that the PFAS monitoring frequency be increased to 2X/yr starting the year before vegetation removal (Figure 1). We also recommend that the stormwater be</p>	<p>destabilized soil allowed to be exposed at a given time.</p> <p>There will be a long-term Operation, Maintenance, and Monitoring Plan implemented as part of the Completion Report.</p>

Commenter	Comment	EGLE Response
	<p>analyzed for PFAS since the landfill gas will be vented towards the cap surface. Methane gas venting will increase over time, requiring long-term monitoring.</p> <p><b>Conclusion</b></p> <p>The Wolverine Community Advisory Group appreciates the opportunity to comment on the House Street FR. We recommend that the House Street Work Plan Final Remedy be rejected as incomplete and that the air quality, fugitive dust control, landscaping, and monitoring issues we raised in this comment letter be addressed in the final plan. It is critical that the PFAS contamination at the House Street Site be managed in a manner that greatly reduces the ability of PFAS to migrate into the groundwater and continue to feed the groundwater plume that is continuing to expand, impacting surface water. The proposed cap will achieve this goal; however, it must be constructed in a manner that does not impact the health and welfare of the community and site workers.</p>	
<p>Brenda Harris on behalf of the Residents of House Street, Herrington Avenue &amp; Surrounding Neighborhoods</p>	<p>As neighbors who reside near the House Street Disposal site, we are writing to you regarding the site remediation Work Plan submitted by Wolverine Worldwide. In June, we sent a letter to EGLE in response to the proposed Work Plan and this is a follow-up to that correspondence. We appreciate that EGLE was able to extend the review and public comment period to allow us this opportunity to fully voice our concerns. While we are not scientists or geologists, our concerns about the impact of this project on our lives, and the lives of construction workers performing the work, are important and should be considered when considering the final approved Work Plan.</p> <p>Below is a list of concerns that we have as a community living near the House Street Disposal site. We ask that EGLE consider to have Wolverine address these concerns in the final Work Plan. We believe that if the Work Plan does not include or specifically address these areas of concern, Wolverine will not be held accountable for all activities relevant to the construction process. As a result, our neighborhood would likely suffer further damages which may cause detrimental impact to our health and our lives. In 2017, our once peaceful and lovely neighborhood was changed forever, with the discovery of the contamination on</p>	<p>Thank you for sharing your concerns regarding the proposed House Street Work Plan. EGLE's responses below are numbered in alignment with the numbered concerns identified in your comment.</p>

Commenter	Comment	EGLE Response
	<p>Wolverine’s property and its infiltration into our groundwater which services drinking wells throughout the area. The mental strain that this has created for our residents is real. The health impact is undeniable. As you may know, there are many instances of cancer and other serious illnesses in our area. PFAS contamination is believed to be the cause of many.</p> <p>Below is a list of concerns we would like addressed and/or included in the final approved Work Plan:</p> <ol style="list-style-type: none"> <li>1. We would like a clear construction timeline of the project, including priorities. In that timeline, we would like to see the completion timelines for each phase of the project. This would allow us to have a clear understanding and expectation for the construction phases and an awareness of when to expect construction activities which will have the most impact on our neighborhood.</li> <li>2. We ask that our residents be provided a responsible emergency contact person in the event problems should arise during the construction project. We also ask for an escalations contact, if our calls/concerns are not being addressed in a timely manner. We would also like the state to specify an appropriate action and/or penalty for reported incidents going unanswered or unaddressed. Because the nature of this project involves toxicity of waste materials, it is important that any concerns be addressed promptly.</li> <li>3. Because this construction site is located in our residential area and truck traffic will travel through our residential area to access the site, we ask that the Work Plan specify acceptable hours of operation and noise levels. We ask that truck traffic be disallowed during the times of day that school buses are on the roads. The safety and wellbeing of the children in our neighborhood is our top priority. We believe that the Work Plan must include work hour and trucking hour restrictions to ensure that these details are passed to construction bidders to outline these expectations clearly. The goal is to avoid any potential danger to children during school bus hours, and to avoid unnecessary noise disruptions to nearby residents.</li> <li>4. There is also concern about driver safety on the road with fully loaded trucks traveling at maximum speeds. We have already seen a constant flow of trucks traveling via House Street and Herrington, to the construction site to</li> </ol>	<ol style="list-style-type: none"> <li>1. According to the Work Plan, “the construction timeline will be determined upon contractor bid award.” At that time, EGLE will request a copy of the schedule and provide it to the residents. The current estimate for construction is approximately 30 months from the start of construction-phase work. The actual construction timeline will be determined upon contractor bid award.</li> <li>2. EGLE has requested that a GZA contact person be included within the Work Plan. For general concerns, please contact the EGLE Project Manager, Leah Gies at 616-215-4781 or the District Supervisor, Karen Vorce, at 616-439-8008. For Air Quality concerns, please contact the EGLE Air Quality Division at 616-356-0500.</li> <li>3. EGLE does not have the authority to restrict hours of truck operation but has shared this concern with Wolverine/GZA. Plainfield Township noise ordinances restricts construction noises between the hours of 8:00 PM and 7:00 AM.</li> </ol>



Commenter	Comment	EGLE Response
	<p>do preliminary work and these trucks are traveling through our residential area at maximum speeds. This poses an immediate danger to local residents traveling to and from our homes and this problem will only be compounded when the full site construction begins and more trucks arrive. Therefore, we ask that the state require that Wolverine obtain a permit from Kent County Road Commission to designate the area surrounding this construction site and access points to it, as a temporary Construction Zone and that speed limits be posted at reduced speeds for the duration of the construction project. This is to create a safer environment for all travelers on this roadway, but particularly for residents who live in this area and who are directly endangered by heavy load trucks traveling at maximum speeds to and from the construction site.</p> <p>5. Recently while municipal water was being delivered to local residents, House Street and Herrington roads underwent full reconstruction and were repaved with newly laid asphalt. If damages occur to these roadways during the construction project, we want Wolverine to be held accountable and cover the costs of repairs. It would be unacceptable for the cost of such repairs to this new roadway to be passed onto taxpayers. We believe that this should be stated in the Work Plan to acknowledge acceptance of responsibility, should repairs be needed during or immediately following the completion of the construction project.</p>	<p>4. EGLE does not have the authority to require a Construction Zone permit. Wolverine must be in compliance with all applicable regulations from the Kent County Road Commission.</p> <p>5. EGLE does not have the authority to require inspections of the public roadway. Wolverine will coordinate with the Kent County Road Commission regarding the necessary permitting and potential repairs in the event of damage due to Work Plan traffic. The truck traffic will also be subject to the spring weight restrictions requiring a seasonal weight reduction below the maximum load amount. When House Street was recently paved after the first phase water main project, Plainfield Township and Kent County Road Commission partnered to pave additional asphalt thickness (5 inches vs. the standard 3.5 inches thick on a Local Road) based on knowledge that there would be higher than normal commercial traffic as it relates to these construction activities.</p>



Commenter	Comment	EGLE Response
	<p>6. We are concerned about air quality during construction, especially during the process of mulching debris and trees on the site. We ask that the Work Plan specify that debris and tree mulching occur only during cold weather months, when residents typically have their windows closed.</p> <p>7. We would like air monitoring equipment and training on its use, to be provided to nearby residents so that air quality may be monitored from various points throughout the area. We ask that the Work Plan fully address the concerns of air quality and explain, in detail, how monitoring will be managed. In addition, we ask that the Plan also specify any corrective actions that would be necessary, should monitoring reflect concerning conditions. We also would appreciate some advice or guidance for residents to follow in monitoring other factors such as dust buildup on properties, etc. Because the nature of this project involves toxicity of waste materials and those waste materials will be exposed into the air during construction, it is important that nearby residents know the warning signs for potential exposure and can report such incidents to the emergency contact. This is not only for the safety of our residents, but also the safety of the construction workers who are conducting the work.</p>	<p>6. EGLE does not have the authority to require work be conducted in the winter months only. Continuous particulate monitoring will be conducted around the site using a high-quality sensor, as was used during the work completed for the USEPA. EGLE is asking that the vegetation chipping activities be addressed in the Fugitive Dust Plan and proper wetting controls be used.</p> <p>7. According to the Work Plan, monitoring will be conducted in the work zones during soil moving and excavation to ensure the health and safety of their own workers. If levels monitored become unsafe for the workers, more engineering controls will be used. The efforts to protect the onsite workers will also provide protection of the residents who are located offsite. The Air Quality Division does not perform ambient air sampling near remediation projects but can provide guidance to the contractors on selecting a device to measure particulate matter. Additionally, organic vapor monitoring and dust monitoring will be conducted at fixed points along the House</p>

Commenter	Comment	EGLE Response
	<p>8. We would like the Work Plan to include proper landscaping details. A Work Plan which omits these details would likely be subject to interpretation of requirements and could certainly lead to conflict and a less desirable solution. We ask that the state require the Work Plan to provide a clear definition of landscaping proposed for the site. Because this is our residential neighborhood, we specifically ask that the chain link fence be replaced by a more esthetic, residential friendly, less institutional looking fence, and that trees/plants or flowering shrubs, perhaps native lilacs, be planted along the parameter to both replace some of the greenspace, and also provide a more natural appearance overall.</p> <p>9. Last, we are concerned about watershed, storm water drainage and erosion, during the project and after the project is complete. We want to have confidence that the areas of the site designated for drainage are adequately designed and will withstand typical and unprecedented watershed. This becomes more important to consider, as extreme weather events continue to occur more frequently than in the past. Does the plan offer certainty with regard to flood risk modeling? We are concerned not only about flooding in our homes, but also flooding and erosion damage to the roadway. We would like to see some statement in the Work Plan which addresses future flooding and erosion issues. We believe that if these issues are not clearly stated, up front, it will only lead to conflict in the future for residents, and the burden and cost to repair issues will fall solely on taxpayers. This is a situation that Wolverine created, and while they implement their remediation solution to contain the contaminants that they disposed of on this property, we expect that the state will hold them accountable to address any residual problems which are related to, or arise from the remediation solution they've implemented. Partial or limited responsibility will not be acceptable.</p> <p>As we've conveyed previously, we acknowledge that the final approved Work Plan with Wolverine will be the enforceable contract that Wolverine and their contractors will be bound to. It must be complete and spell out exactly what is required in every aspect of this complex project, timeline of execution and establish all the markers to measure success along the way. Nothing should be left open to interpretation. Nothing should be left vague, or undefined. Doing so would only pave the way for discrepancy and conflict down the line. Nobody wants that.</p>	<p>Street Property boundaries. EGLE has requested that the boundary air monitors will collect samples for PM10 to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) for PM10 of 150 µg/m<sup>3</sup> (24-hour). If residents believe they are being impacted from dust moving offsite, they should contact EGLE at 616-356-0500. The Air Quality Division can determine if additional dust control measures are necessary.</p> <p>8. The chain link fence was a requirement from the EPA. It is EGLE's understanding that once construction is completed, the existing chain link fence will be replaced with a different type of fencing that will be determined based on the final site condition and will take into account input from the community and appropriate local, state, and federal agencies.</p> <p>9. Stormwater runoff and routing calculations prepared by GZA show that the volume of stormwater generated during a 100-year storm event will be contained within the proposed</p>

Commenter	Comment	EGLE Response
		<p>stormwater pond footprint and it is likely that infiltration of stormwater will occur in other, uncapped areas of the site similar to what currently occurs at the site. The predicted 100-year high water elevation within the proposed retention pond is calculated to be approximately 752 feet, which is almost 18 feet lower than the low point of the adjacent roadway (House Street). Considering what the calculations and modeling show, and the fact that site soils are sandy with high permeability, we do not anticipate that stormwater runoff reaching and residing in the proposed retention pond will overtop the road, nor will it flow into existing residential areas adjacent to the site. If problems with the retention pond or adjacent roadway embankment arise, it will be incumbent upon the owner to repair as necessary. Repairs will be inspected by a qualified engineer for completeness and workmanship, should they be necessary. Further, as a part of this closure plan, it will be required that the owner conduct regular inspections of the closure cap and retention pond, to assess and monitor that it is</p>

Commenter	Comment	EGLE Response
		<p>functioning in the way the design intended.</p> <p>The proposed drainage ditch that would run along the western and southern perimeter of the southwest mound appears to have adequate capacity to convey stormwater to the retention pond, as intended. Based on the topographic elevation contours in the work plan, stormwater in areas north and east of the capped areas is predicted to follow the existing, natural drainage paths, which are ultimately lower in elevation relative to the adjacent residential areas; therefore, flooding to the north and east is not anticipated to be a concern.</p> <p>During the project, soil erosion and sedimentation control (SESC) requirements will be incorporated into the construction phase of the project and those controls are inspected in accordance with a construction stormwater permit. Erosion control is an important part of maintaining the closure cap. An OM&amp;M Plan will be submitted in the Completion Report that will include erosion</p>

Commenter	Comment	EGLE Response
		<p>control features such as erosion control matting, riprap, and established vegetation, so that the closure cap, the roadway, stormwater ditches, and other elements are protected. Areas that exhibit erosion will be required to be repaired by the owner, as necessary.</p>