

Michigan Department of Environment, Great Lakes, and Energy
Wolverine CAG – Air Monitoring Plan – Construction Phase
October 25, 2023

The Wolverine Community Advisory Group (WCAG) is comprised of concerned citizens who have been impacted by PFAS contamination from the Wolverine Worldwide (WW) 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 Air Monitoring Plan – Construction Phase document by Wolverine Worldwide (WW), submitted to EGLE on October 16, 2023.

Our concerns are based on two parts of the plan:

1. The location of the perimeter monitoring stations is inadequate to be protective residential dwellings in the Northeast corner.
2. No information concerning public notification of air quality exceedances is included.
3. Instrument Calibration information is not included.

Section 3 states: “The overall project objective is to monitor and minimize risk of exposure of on-site personnel and off-site receptors to target constituents (metals, PFAS, VOCs, and dust) before and during Final Remedy construction activities at the HSP.” WW’s proposed plan is flawed in that it presents no analysis of the prevailing wind direction. The proposed plan relies on four perimeter monitoring stations shown in Figure 1 (orange dots). Wind Roses are graphical charts that characterize the speed and direction of winds at a location. The length of each "spoke" around the circle indicates the time the wind blows from a particular direction. A Composite Wind Rose was added in the center to show the direction of the prevailing wind. Seasonal Wind Roses from the Kent County Airport are included in Figure 2. These figures show that WW’s Air Quality Monitoring Plan provides no coverage for the largest cluster of homes that border the House Street Property (HSP) when the wind is tracking in the prevailing direction and when earthwork is being performed in the center of the site. The Composite and Seasonal Wind Roses show that the prevailing wind direction is out of the Southwest and in the direction of the homes along the Northeast corner. Given the fact any construction in the central part of the HSP could create dust that would be carried by the prevailing wind toward residential receptors, there should be a permanent air monitoring station located in the vicinity of the red circle in Figure 1.

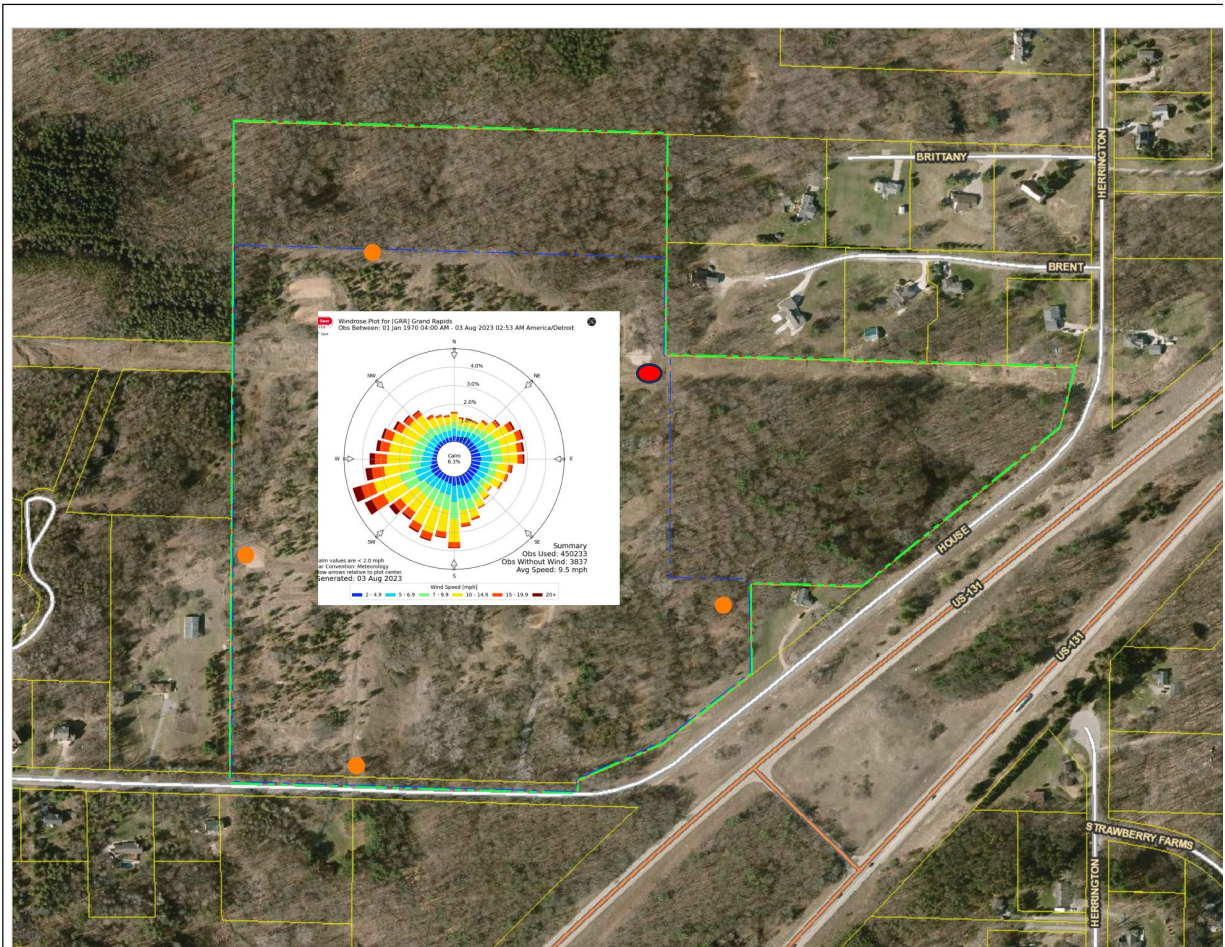


Figure 1. Proposed Perimeter Air Monitoring Stations (orange dots) with a composite Wind Rose for the Grand Rapids area from 1970-2023 (ISU 2023). The location of the additional Monitoring location is in red.

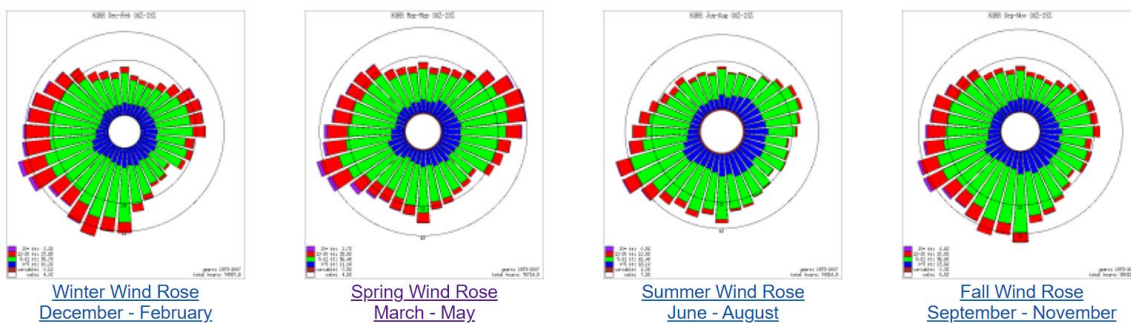


Figure 2. Seasonal Wind Roses from the Kent County Airport (<https://www.weather.gov/grr/grrinfo>).

Moving one of the existing stations will limit the proper coverage necessary to protect public health.

A flow chart of communications for the distribution of Air Monitoring Information data and a contact list is provided on page 7. There is no mention of communicating this information to the House Street Neighborhood. We understand that a note was sent to the House Street Residents in September that they would be notified of any exceedances recorded at the perimeter monitoring stations. The Air Monitoring Plan – Construction Phase was submitted as an official document, and we request that the procedures for public notification be included in the formal plan. We also feel that the results should be posted on the We Are Wolverine blog on a weekly basis.

The results of the Air Monitoring Program will be used for decision making and assessing the safety of operations with respect to the receptors in the neighborhood. Consequently, the calibration and operation of monitoring equipment is a primary concern. There is no specific information on the calibration of the AQS-1 monitoring system for dust in the plan. A formal calibration procedure should be included instead of defaulting to manufacturer's recommendations not provided to the reader. We request that the daily calibration routine be included, and the frequency of running standards be defined. This information is consistent with what is required for a Quality Assurance Project Plan. We also recommend that a spare AQS-1 instrument be available if one of the stations has a maintenance issue. If WW wants to substitute a TSI 8530 DUSTRAK meter, it must be set up in an air monitoring enclosure and not operated as a hand held instrument. WW also should provide a complete calibration procedure for this instrument.

The Wolverine Community Advisory Group appreciates the opportunity to comment on the Air Monitoring Plan – Construction Phase for the House Street Property. Since the goal of the Air Monitoring Program is to protect both onsite workers and off site receptors, the perimeter monitoring stations must reflect the prevailing wind direction and the location of residential dwellings. We feel that the details of the calibration for the air monitoring equipment be included in the plan. In addition, the House Street neighborhood must receive the same notification as the project and WW personnel if safe levels are exceeded at the property line. We request the Air Monitoring Plan be revised as described above.

Sincerely,

A handwritten signature in black ink, appearing to read "RR Rediske", enclosed in a thin black rectangular border.

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

References

Iowa State University Mesonet

https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=GRR&network=MI_ASOS