

March 20, 2025 CAG Meeting



Applicable Laws and Rules

Part 201 and the Due Care Rules -

https://www.michigan.gov/egle/about/organization/Remediation-and-Redevelopment/Remediation-and-Investigation -



Laws & Rules

- Part 201, Environmental Remediation
- Property Owner or Operator Obligations Under Section 20107a of the Act
- Part 213, Leaking Underground Storage Tanks
- Part 31, Water Resources Protection (mixing zones)
- Part 201 Administrative Rules
- Part 201 Administrative Rules Update Tables



Transfer of Property

 Part 201 requires that any person with knowledge that any portion of the property is a Part 201 facility must provide written notice to person receiving interest in the property and disclose the general nature and extent of the release (Sec. 20116)



Transfer of Property



A person can buy contaminated property and be protected from liability for cleanup of existing contamination on the property if they conduct a baseline environmental assessment (BEA) and submit it to EGLE

Due Care



Section 07 lays out the obligations a current owner or operator has for a Part 201 Facility

- Responsible for using the property safely.
 Entirely depends on Property use.
- Responsible for making the proper notifications
- Obligations begin the moment the owner/operator becomes aware the property is a Facility and must be maintained throughout ownership/operation.
- **Self-implemented**. Owner/Operator have an obligation to maintain their documentation of due care compliance. (Rule 1003(5))

Due Care

EPA's work
 identified a lot of
 what is left in place
 above residential
 standards (TCRA
 report in RIDE,
 dated 6/14/22)

Shallow Soil Sample (0-3 feet bgs) Not Excavated

- One or more arsenic results greater than EGLE Part 201 residential DC*
- No arsenic results greater than EGLE Part 201 residential DC*

Deep Soil Sample (>3 feet bgs) Not Excavated

- One or more arsenic results greater than EGLE residential DC*
- No arsenic results greater than EGLE residential DC*
- Excavation
 - Approximate Tannery Property Boundary



Mitigate Unacceptable Exposures

Most common pathways with unacceptable exposures

- Direct contact
- Volatilization to Indoor Air













What does the Consent Decree say?

Consent Decree -

https://www.michigan.gov/pfasresponse/investigations/sites-aoi/kent-county/house-street-disposal-area -

Background

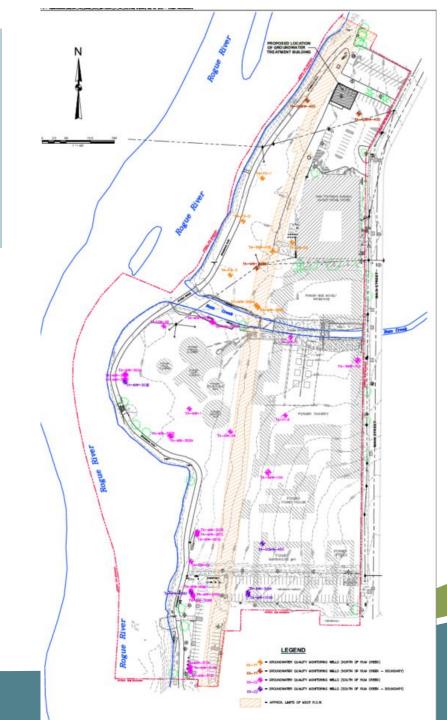
The Belmont - House Street area consists of a former licensed disposal facility owned and operated by Wolverine World Wide (Wolverine) at 1855 House Street in Plainfield Township, a suspected disposal area in the Wolven/Jewell area north of 10 Mile Road in Algoma Township, and Michigan Department of Environment, Great Lakes, and Energy (EGLE) investigations into several citizen-reported unregulated dump sites across three townships in northern Kent County.

On February 19, 2020, the Consent Decree between the State of Michigan (Plaintiff), Plainfield and Algoma Townships (Intervening Plaintiffs) and Wolverine (Defendant) became effective and serves as the framework for all future PFAS response activities performed by Wolverine at the House Street property and surrounding area identified as the "North Kent Study Area". Wolverine will conduct these activities under EGLE oversight, and the Consent Decree includes tools that ensure that the required work is completed.

Content updated March 2025.

Tannery Consent Decree Requirements

- Section 7.12
 - Continued operation and maintenance of trenches
 - Continued implementation of an approved groundwater monitoring plan
- Section 7.7 land and resource use restrictions
- Section 9.6 Maintaining access



House Street

- Estimated start date of April 14
- Air monitoring equipment will be deployed before then
- Start date will depend on the weather



Tannery

- The interceptor system is running!
 - Treated water was initially held in a tank pending test results to confirm they were meeting their permit limits
- Monthly progress reports with site-wide groundwater flow maps
- Weekly PFAS testing as part of the NPDES permit
- Property will be re-vegetated this spring



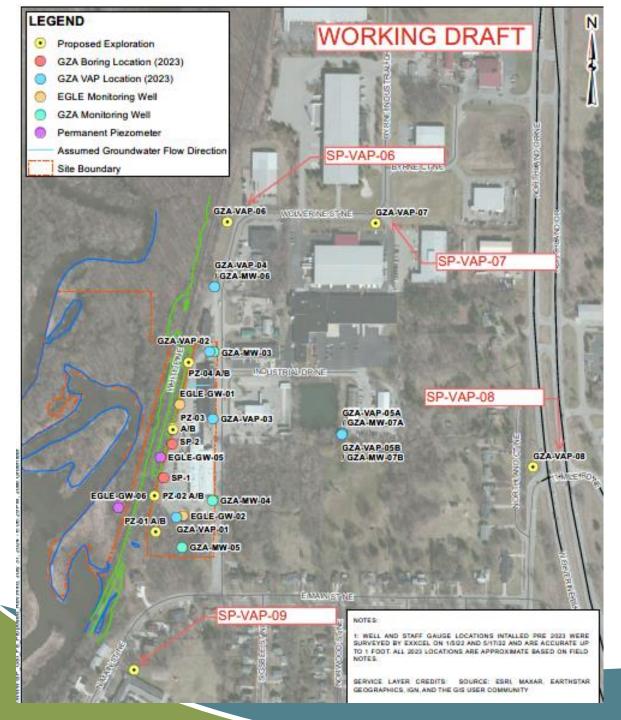
Tannery





Completion Reports

- Available for viewing on RIDE (under House Street) or on the House Street MPART page (under Anticipated Activities)
 - Area 5, Area 6, and Areas 11 and 12 Response Activity Plans The four quarterly sampling
 events proposed under the Response Activity Plans have been completed. Draft Completion
 Reports for these areas, summarizing the data and proposing next steps, were submitted on
 February 19, 2025.
 - Area 5 Completion Report
 - Area 6 Completion Report
 - Area 11/12 Completion Report
 - Area 19 Response Activity Plan The sampling event proposed under the Response Activity
 Plan has been completed. <u>A Draft Completion Report</u>, summarizing the data, was
 submitted on February 19, 2025
 - Residential Resampling Response Activity Plan Wolverine has completed the three years
 of residential resampling outlined in the September 30, 2020, Residential Resampling
 Response Activity Plan. <u>A Draft Completion Report</u>, summarizing the results of the
 resampling and proposing next steps, was submitted on February 19, 2025.

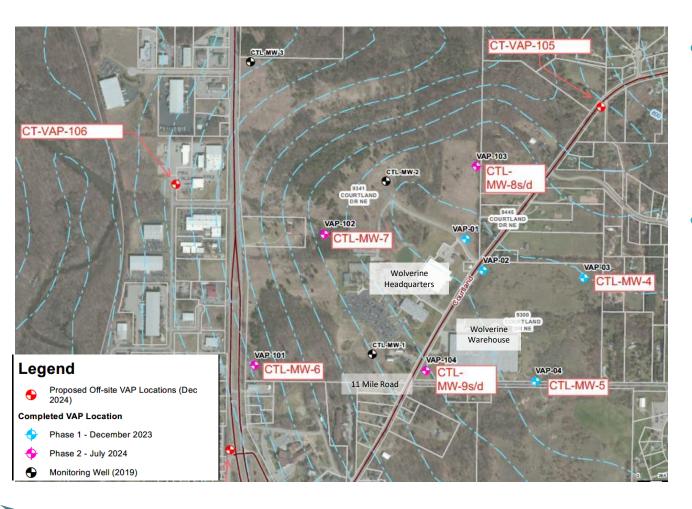


Sole Plant

- New data received is in RIDE
- GZA is preparing updated cross sections and a proposal for well depths off-site
- Next steps will include slug testing on-site



Courtland & 11 Mile



- On-site wells were sampled, data pending
- GZA
 submitted a
 groundwater
 flow map for
 the site –
 Currently in
 review