



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

June 27, 2019

Wolverine Worldwide, Inc.
c/o Mr. David A. Latchana (david.latchana@wwwinc.com)
Associate General Counsel for Wolverine World Wide, Inc.
9341 Courtland Dr. NE
Rockford, MI 49351

Rose & Westra, a Division of GZA
c/o Mr. Mark A. Westra (Mark.Westra@gza.com)
Project Coordinator
601 Fifth St., NW
Suite 102
Grand Rapids, MI 49504

Via Email delivery

**Re: Work Plan, House Street Disposal Area, Plainfield Township, Kent County, Michigan:
Approval with Significant Modifications.**

Dear Mr. Latchana and Mr. Westra,

The U.S. Environmental Protection Agency (EPA) completed its review of the *Work Plan, House Street Disposal Area, Plainfield Township, Kent County, Michigan* dated June 3, 2019. This document was submitted in accordance with the January 10, 2018, Unilateral Administrative Order from EPA to Wolverine World Wide, Inc. (WWW).

U.S. EPA hereby approves the above-referenced document with the required modifications described herein included. WWW shall incorporate the comments below and submit a revised, renamed and final *Removal Work Plan, House Street Disposal Area, Plainfield Township, Kent County, Michigan* to U.S. EPA no later than 1700 EDT on July 12, 2019 (I am giving you 14 days to finalize and return this plan, instead of the normal 7 days, due to the 4th of July Holiday week).

The following modifications and/or additions are required to be included in the final work plan:

1. General: Provide a Gantt Chart for all proposed activities in a timeframe to complete those activities this construction season.
2. Section 3.3, Page 2, 5th paragraph: The proposed sign is unacceptable. The sign must be at least 24 inches by 36 inches in size, and must contain the following language or similar (if changes approved by the OSC:

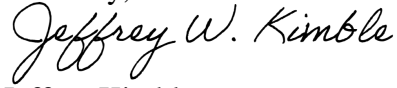
“No Trespassing
Former Permitted Landfill
Hazardous Waste, Hazardous Substances and PFAS Waste Exists On Site
Keep Out”.

3. Section 3.4, Page 3, Paragraph 6: GZA must sample and characterize any waste encountered off site, regardless if the waste is similar in appearance, color, etc. to waste encountered on site. If waste encountered off site is similar to other waste encountered and sampled from adjacent borings, then waste samples from adjacent borings may be sufficient to characterize the waste if approved by the OSC and only after such discussion. Otherwise, the off-site waste encountered shall be sampled.
4. Section 3.5, Page 4, Paragraph 3: GZA must state that if waste is encountered during this portion of the investigation, that it will be sampled.
5. Section 3.5, Page 4, Paragraph 3: GZA must state that if perched groundwater is encountered during this portion of the investigation, that it will be sampled.
6. Section 3.5, Page 5, Table after Paragraph 6: The projected number of samples should be 40 - 48, not 20 – 24.
7. Section 3.6.1, Page 5, Paragraph 1: If GZA plans to pursue an approach which determines that chromium is not migrating off site, a separate plan must be provided which describes the method of how GZA plans to study the rate of horizontal and vertical migration of chromium and any other identified hazardous substances, because the current data is insufficient to make this determination. A specific plan for off site waste migration and complete soil profiling to the aquifer would need to be developed and would need to sufficiently answer the question of waste migration rates away from source areas. The recent sampling effort (2018) does not answer this question.
8. Section 3.6.1, Page 5, Paragraph 2: There are five areas with chromium TCLP exceedances, not four. Correct this.
9. Section 3.6.1, Page 6, Paragraph 4: GZA should state how many samples will be collected from each boring, and also be clear that samples will be collected from all borings. No bench scale comparison of XRF total chromium values to corresponding TCLP chromium results has been conducted by WWW to EPA's knowledge, therefore assumption does not work. You are specifically looking for the extent of the TCLP waste, not total chromium.
10. Section 3.6.1, Page 6, Paragraph 4: Please explain the relationship between chromium XRF screening results, total chromium analytical results and TCLP chromium analytical results. No analysis of these relationships has been provided to EPA.
11. Section 3.6.1, Page 8, Paragraph 3, Bullet 1: The backfill used at the site must be certified clean.

Work should proceed in a timely manner to complete activities this construction season. If any obstacles or roadblocks arise which may complicate this, WWW must immediately notify the OSC and, if appropriate, ORC Tom Williams should it be a legal matter. Failure to take appropriate steps to move work forward will not be an excuse for lack of work completion.

If you have any questions regarding this letter, please contact me immediately at (734) 692-7688.

Sincerely,



Jeffrey Kimble
Federal On-Scene Coordinator
U.S. EPA, Region 5

cc: T. Williams U.S. EPA, ORC
J. Clark, U.S. EPA, ORC
G. Asque, U.S. EPA, ORC
B. Nightingale, U.S. EPA, Region 5
T. Edwards, U.S. EPA, Region 5
M. Mankowski, U.S. EPA, Region 5
J. El-Zein, U.S. EPA, Region 5
D. Ballotti, U.S. EPA, Region 5
A. Hendershott, MDEQ (HENDERSHOTTA@michigan.gov)
D. Wierzbicki, MDEQ (WIERZBICKID@michigan.gov)
J.Byl, WN&J (JByl@wnj.com)
Records Center, U.S. EPA, Reg. V