PFAS Investigations in North Kent County

An Introduction to the Wolverine World Wide Investigation



Region 5 Regional Response Team PFAS Webinar – February 4, 2021 Presented By: Abigail Hendershott and Karen Vorce, EGLE-RRD



Wolverine World Wide's Rockford Tannery



Undated image from Rockford Historical Society

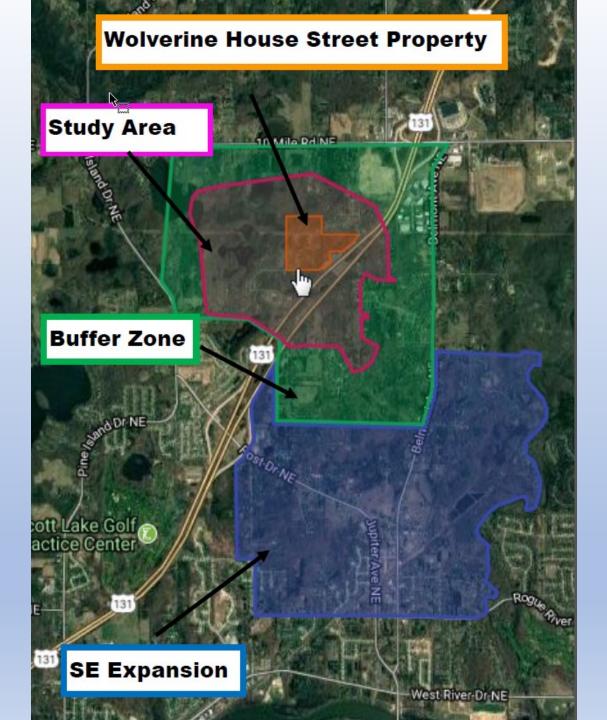
- 1903 Shoe production starts under Hirth-Krause Co.
- 1909 Wolverine Tannery opens
- 1958 Start of Scotchgard[™] use with the introduction of the "Hush Puppies" shoe line
- 2010 Tannery site demolished and razed

House Street Disposal Site



Waste materials disposed of in unlined trenches, ponds, lagoons and into lowlands/ravines

- Late 1930s- First reference to Wolverine disposal activities on House Street
- 1964 Wolverine purchases the property
- 1966 Licensed disposal facility
- 1970 Disposal activities stop



House Street Timeline

January 24, 2017 – Citizen group meets with EGLE to discuss House Street

April 2017 – Wolverine samples 8 houses NE of disposal site for PFAS. Results below USEPA LHA (70 ppt for PFOA & PFOS). EGLE requests onsite sampling

May/June 2017 - EGLE notified of DoD Belmont Armory well results exceeding USEPA LHA (located SW of site)

June - October 2017 - Wolverine residential well sampling expands. Begins onsite groundwater investigation at House Street.

October 2017 - EGLE is provided information from public regarding other alleged Wolverine disposal areas (incident managers mobilized) (investigated 109 sites)

November 2017: Incident Managers Deployed





109 alleged dump sites investigated



Wolven-Jewell Source Area



1953 USGS

North Kent Landfill

House Street Disposal Area



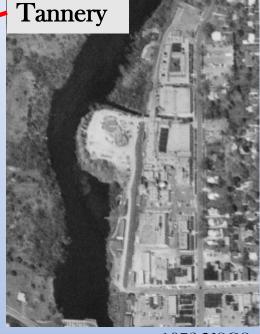
1965 USGS

Extract from 1918 Cedar Springs topo Edgerton Plainfield Forest Ridge Park

Sites of Investigation

Area Neighborhoods

1972 USGS



1972 USGS

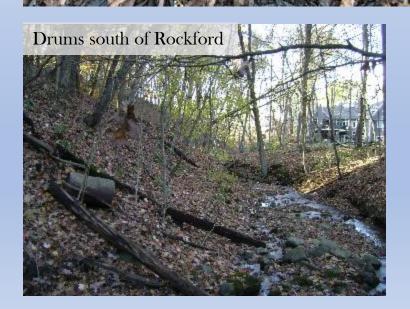
Northeast Gravel

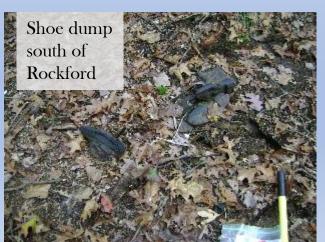
Tannery leather scraps along Rogue River

Other Disposal Site Investigations



Tannery waste at Northeast Gravel Site







Tannery rubber scraps in gravel pit east of Rockford

Timeline Continued.....

November 2017 through February 2018

• Continued residential well sampling, sampling areas added.

January 2018:

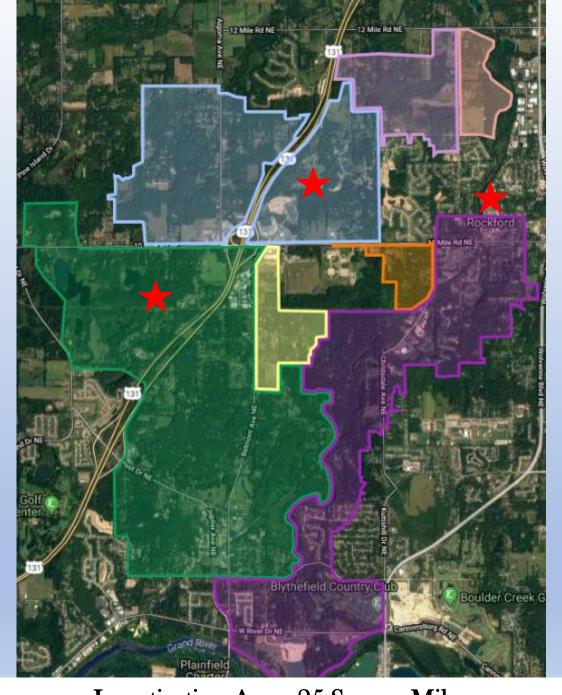
• EGLE filed a legal complaint against Wolverine under RCRA and state law

March 2018

• EGLE begins implementation of a state funded hydrogeologic groundwater investigation

May 2018 thru 2020-

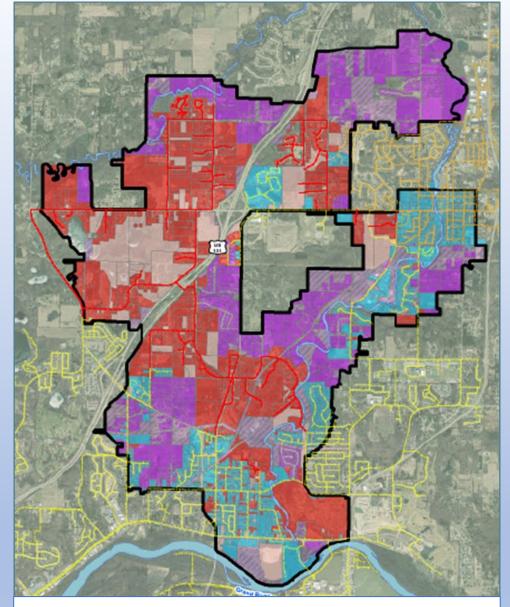
- House Street and Tannery onsite source investigations (CERCLA hazardous substances for USEPA; PFAS sampling for EGLE).
- TCRA completed under USEPA Order
- Continued off-site groundwater investigations for EGLE



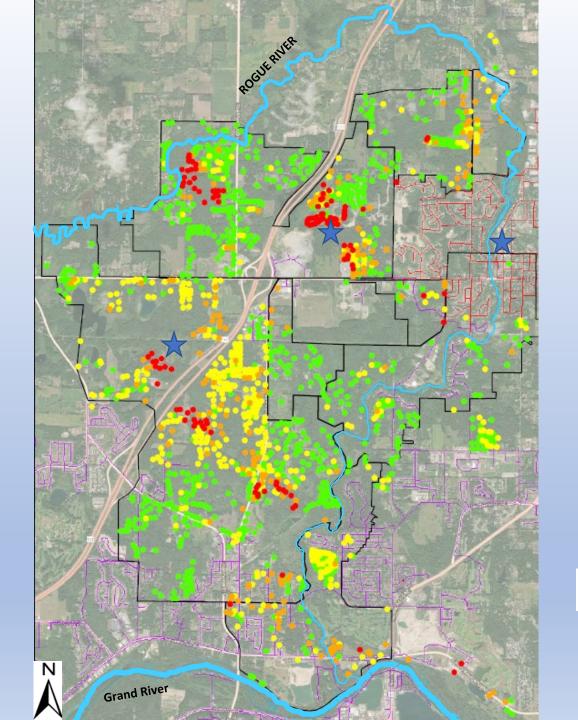
Investigation Area: 25 Square Miles

February 19, 2020 Consent Decree

- Consent Decree between the State of Michigan (Plaintiff), Plainfield and Algoma Townships (Intervening Plaintiffs) and Wolverine (Defendant) became effective on Feb. 19, 2020 (www.Michigan.gov/Belmont)
- Serves as the framework for all future PFAS response activities performed by Wolverine in the "North Kent Study Area"
- Wolverine will conduct these activities under EGLE oversight



North Kent Study Area
Purple = Filter Area
Red = New Municipal Water Area
Blue = Existing Municipal Water



1st Priority: Mitigating Risks

1720 water wells sampled

PFOS + PFOA, ppt

- Non-Detect (925)
- >0 to 10 (463)
- >10 to 70 (208)
- > 70 (124)



Photo: Example of a POET system installed by Wolverine

FILTERS (maintained by Wolverine)

- 538 Whole-House Filters
- 236 Point-of-Use Filters



Drinking Water Response

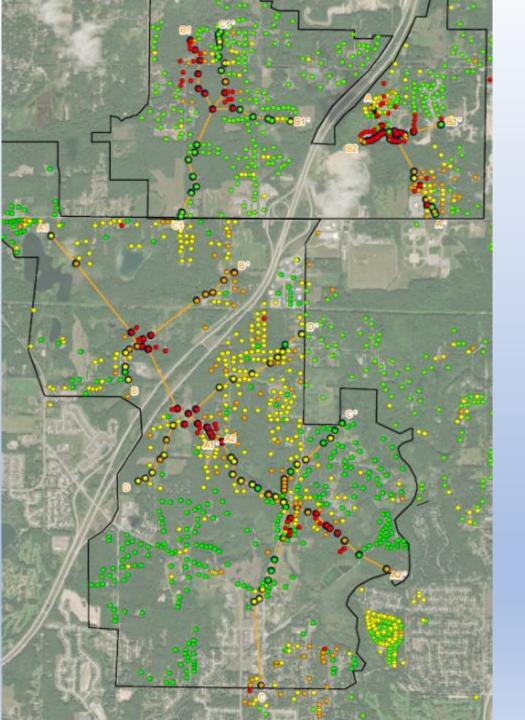


Initial Response Efforts

- Sampling of residential wells
- Wolverine provided bottled water to residents
 - Point-of-Use certified filters
 - Installation of Point-of-Entry Treatment Systems (POET) (GAC)
 - Sampling of POET systems

Things to Consider

- What standards are you comparing results to? (LHA, state regs, local/state health screening values)
- Who is lead agency/entity communicating sample results to residents?
- Sampling Analysis Plan (SAP)
 - Quality Assurance Project Plan (QAPP)
- Filter O&M Plan continued operation and maintenance needs

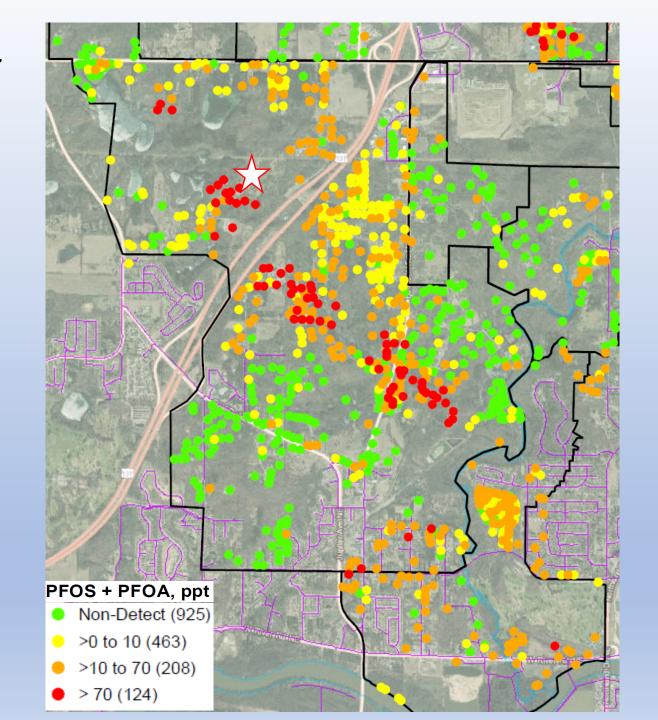


2nd Priority: Creating the Conceptual Site Model (CSM)

- Lidar Imagery (USGS National Map Viewer)
- Topographic & Bedrock Maps
- County Soil Survey
- Residential Well Logs (Wellogic System)
- Environmental Well Logs
- Environmental Sampling Data
- Gamma Ray Logs
- Interviews with Former Tannery Employees

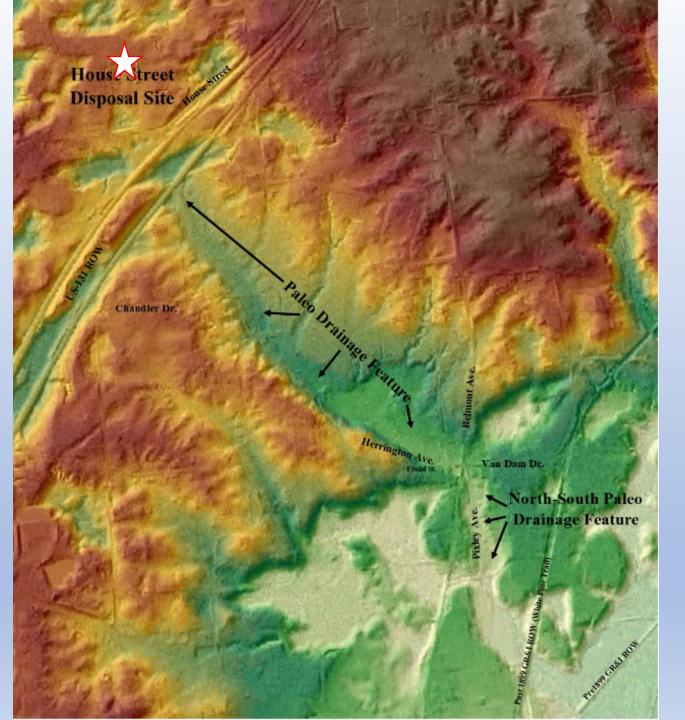
House Street Disposal Area

- Drinking Water well's highest concentration: 96,000 ppt
- On groundwater divide with flow in multiple directions; Rogue River encircles area
- Basic House Street Disposal Area geology: surficial clay underlain by sand to 175'; depth to first impacted aquifer approximately 60'



House Street Disposal Site Plan vs. Lidar DEM





Lidar & Paleo Features



Wolven-Jewell Source Area

- Gravel "pit" where liquid disposal appears to have occurred is active in the 1950s but inactive by 1965
- Over 50' of elevation change within the neighborhood with the gravel "pit" being in the topographic high area where the highest concentrations are found



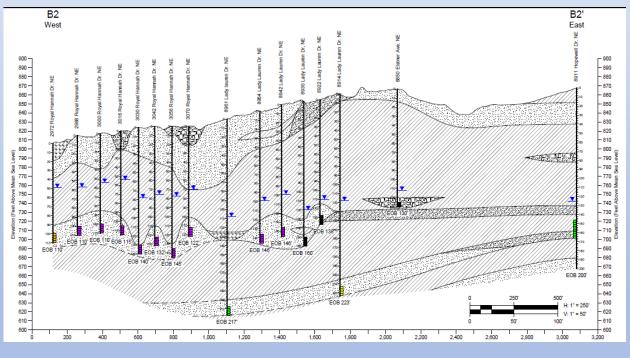
EPA geophysical survey of source area

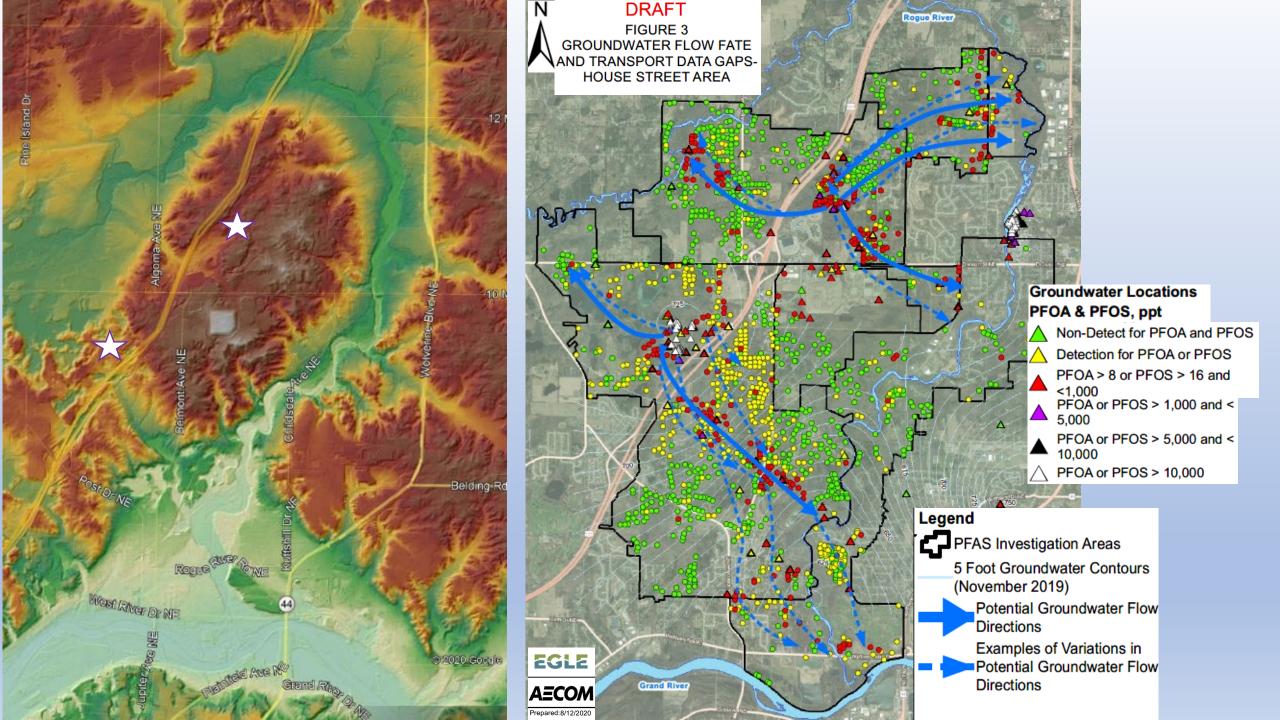


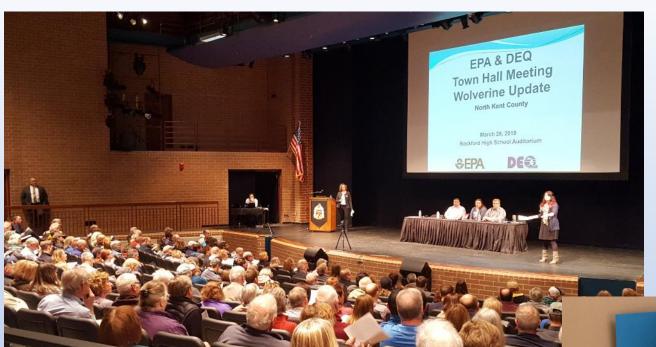
MW-WV-3: 815.6-810.6 718-708 SIR CHARLES 722-707 739-729 724-784 DEQ-MW-11-130 Note - Well depths l l Results Note - Results are th results for the drink DEQ-MW-11-137 DEQ-MW-11-145 719.1-714.1 710.2-705.2

Wolven-Jewell Area

- Neighborhood built over suspected source area
- Heterogeneity







Communication and Engagement

- Town Hall Meetings
- Neighborhood/Small Group Meetings
- One on One Engagement











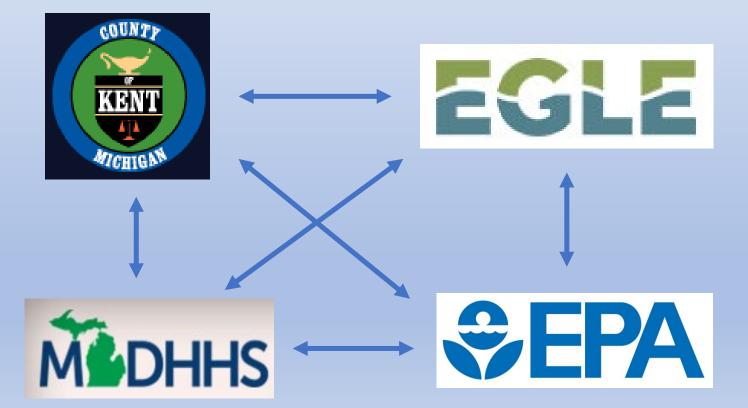
Communication and Engagement

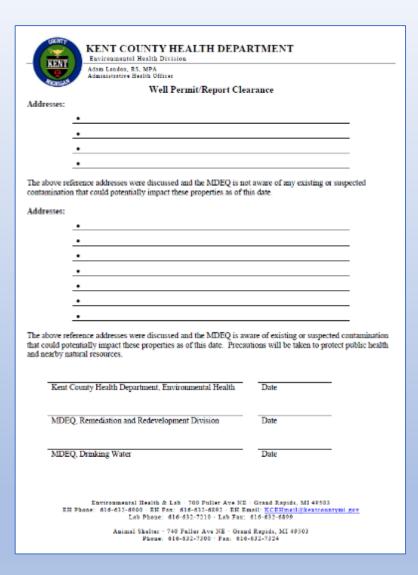
• Signage in community



Agency Collaboration

- Project Coordination Meetings
 (Daily → Weekly → Monthly)
- Well Permit Application Reviews
- Legislative Update Calls













What's Next?

- Continuing Community Engagement
- Oversight and review of Wolverine activities under the Consent Decree
- Continued collaboration with USEPA





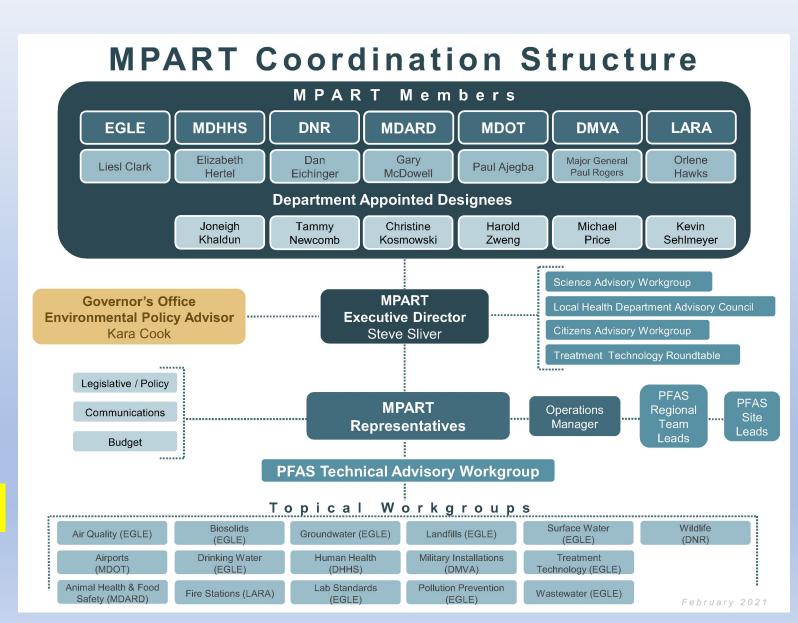




Michigan PFAS Action Response Team (MPART)

- Executive Order 2019-03
- Unique Multi-Agency Approach
- Leads Coordination and Cooperation Among All Levels of Government
- Directs Implementation of State's Action Strategy

www.Michigan.gov/PfasResponse



Questions?

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For more information on Wolverine investigations visit the MPART website at www.michigan.gov/belmont www.michigan.gov/rockfordtannery

