



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

Re: Work Plan, Former Wolverine Tannery, Rockford, Michigan: Approval with Modifications.

Dear Mr. Latchana and Mr. Westra,

The U.S. Environmental Protection Agency (EPA) completed its review of the *Work Plan, Former Wolverine Tannery, Rockford, Michigan* dated June 2, 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, Former Wolverine Tannery, Rockford, Michigan* to EPA no later than 1700 EDT on July 12, 2019.

1. General: Provide a Gantt Chart for all proposed activities in a timeframe to complete those activities this construction season.
2. Section 3.3.1, Page 2, Bullet 1: Visual observation alone is not an acceptable delineation method. The delineation must be conducted with a combination of an XRF as a screening tool with visual observation and sampling based on those factors.
3. Section 3.3.1, Page 2, Bullet 1: The number of samples collected from each boring, how the sample depths will be chosen, and the total depth of the borings must be stated. All samples must be run for TCLP analysis as this section is specifically defining the extent of the TCLP issue.
4. Section 3.3.1, Page 2, Bullet 1: Strike the word “extractable” from the last sentence.
5. Section 3.3.1, Page 3, Bullet 2: The number of samples collected from each boring, how the sample depths will be chosen, and the total depth of the borings must be stated. All samples must be run for TCLP analysis, not just the samples which exceed the 20x screening value.
6. Section 3.3.1, Page 3, Bullet 2: Strike the word “extractable” from the last sentence.

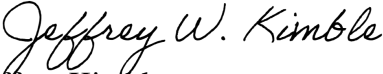
7. Section 3.3.2, Page 3, Paragraph 2: The number of samples collected from each boring, how the sample depths will be chosen, and the total depth of the borings must be stated.
8. Section 3.3.2, Page 3, Paragraph 3: The number of samples collected from each boring, how the sample depths will be chosen, and the total depth of the borings must be stated. The number of borings should be stated, unless the results are dependent on the number of step outs, in which case the rationale for conducting a step out must be explained.
9. Section 3.3.2, Page 3, Bullet 1: The Direct Contact Criteria is not the only threat which needs consideration; alternative provisions must also prevent the migration of contaminants to the nearby Rum Creek and Rouge River via groundwater.
10. Section 3.3.3, Page 4, Paragraph 2 and Figures: The excavation plans are not clear. The intended area of excavation should be drawn and clearly labeled on a figure, or the workplan shall clearly state that all areas of leather scrap will be excavated and disposed because CERCLA hazardous substances have been found in samples with leather scrap in several areas.
11. Section 3.3.3, Page 4, Paragraph 3: The number of samples collected from each boring must be stated. The number of borings should be stated, unless the results are dependent on the number of step outs, in which case the rationale for conducting a step out must be explained.
12. Section 3.3.3, Page 4, Paragraph 4: CERCLA hazardous substances, as well as ammonia generation were found to be associated with the leather scraps. If leather scraps are encountered, they should be sampled, unless GZA plans to remove all buried leather scraps, in which case this needs to be clearly stated.
13. Section 3.4.1, Page 5, Bullet 3: GZA must identify all local, state and federal requirements for soil erosion and storm water management are being addressed.
14. Section 3.4.4, Page 6, Paragraph 2: The backfill used at the site must be documented certified clean.
15. Section 3.5.5, Page 9, Paragraph 1: The backfill used at the site must be documented certified clean.
16. Section 3.5.5, Page 9, Paragraph 3: GZA must provide a more concrete definition of “same specification as existing” before paving restoration work is to commence. Please state the requirements.
17. Section 3.6, Page 10, Paragraph 3: The sediments should be removed not fenced as they can be accessed from the river.
18. Section 6.0, Page 14, Number 1: Provide a figure with the installed locations of the signs and kiosks.
19. Figure 3: The “Approximate Horizontal Extent of Leather Scraps” (blue outline) north and west of the WWW Retail Building should extend to the river bank where leather scraps have been observed at the river’s edge.
20. General: Any areas where shallow soils are excavated but waste that exceeds any State or Federal cleanup criteria remains, a demarcating layer or fabric will be placed prior to backfill. The intent here is to clearly differentiate clean verse still

contaminated soils if and when future cleanup action occurs or if site development occurs so that the soils may be properly addressed at that time.

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 at (734) 692-7688.

Sincerely,


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

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