7-13-2012

To: Wolverine World Wide Tannery Site File

From: Partap C. Lall P.E. On-Scene Coordinator

Re: Preliminary Site assessment,future plans

In September 2011 Superfund Division Director Rick Karl directed the removal program to conduct an assessment at the Wolverine Worldwide (WWW) Tannery site in conjunction with remedial site assessment program. Two separate petitions and several support letters had been received in the region from various citizens groups requesting a complete assessment of the site conditions following the termination of manufacturing activities and demolition of buildings by the company. This 100+ years old tannery was located on the banks of Rogue River in the heart of downtown Rockford, Mi. City of Rockford will like to develop this prime location after the contamination issues are addressed.

EPA site assessment coordinator Nuria Muniz, OSC Partap Lall and MDEQ Site assessment manager Joe Walczak met with WWW officials and their technical contractors in order to gain the available site information. The company did not provide any documentary information but did verbally describe the approach that they had taken during de –commissioning of the factory. All equipment, buildings and structures were demolished and disposed off. Site grounds were covered with backfill, graded, seeded fenced and 3 monitoring wells were installed. No soil or sediment testing had been done. The 3 monitoring wells had been sampled by WWW and showed Cr, As and Ammonia contamination. WWW had held a public meeting in September 2011 but lack of information regarding soil contamination and presence of contaminants in the ground water led to increased level of concern in the community. The company did not have any plans for further evaluation or remediation.

After meeting with EPA and MDEQ the company agreed to participate as a team with the agencies in a limited assessment of site conditions and for MDEQ to determine if the site would score on the HRS ranking scale. As a result 13 locations for geo-probe samples were selected based upon the locations of historical spills, storage of chemicals and processes that used them. Two additional monitoring wells and 5 pizometers were also installed. In addition the agencies (EPA and MDEQ) collected extensive metal contaminant data on the banks of the river and in the river sediment with the use of an XRF.

Analytical data showed contamination above three times the soil screening criteria for non residential soils in the sub-surface soil samples with respect to As, Cr (trivalent and hexavalent), Cd ,Hg, Ammonia, Cyanide and 1-2 dichlorobenzene. Surface soils did not show contamination. Ground water samples showed contamination above the ground water-surface water interface (GSI) criteria with respect to hexavalent Chromium, As, CN, Nitrite and Sulfate. Field screening of riverbank soils and sediment showed above background concentrations of heavy metals at various locations. Discarded animal hydes were also observed imbedded in the river banks upstream from the site.

Following the information gathering a public meeting was held jointly by EPA Removal section and site

assessment section as well as MDEQ . Site does have subsoil contamination and possibly "hot spots" causing migration of contaminants as the shallow ground water comes in contact with contaminated soils. The site does not present an immediate threat to public health but if the soils are disturbed there will be likelihood of exposure through direct contact. Ground water on the site is not being used. EPA and MDEQ announced that a complete site assessment and extent of contamination study is warranted leading possibly to further remediation. Future course of action for the site will depend on the outcome of HRS score.

The PA (preliminary Site Assessment report) was finalized on June 21, 2012 and the site did score above 28.5. MDEQ district office wrote a letter to EPA requesting that State take over the site lead with periodic reporting to EPA. WWW wrote a letter to MDEQ committing to further investigation and remediation under state's oversight. Rick Karl agreed with this approach and EPA site assessment section turned the site over to the state as an OCA (other cleanup authority).

As a result Removal Branch will not have jurisdiction over the WWW site except in a supporting role to the MDEQ district office enforcing and overseeing WWW's activities. In future if circumstances warrant, Removal program may be asked to help.

Contact P.C. Lall OSC 7347409015

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