STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

RICK SNYDER
GOVERNOR

C. HEIDI GRETHER
DIRECTOR

December 13, 2017

VIA E-MAIL

Mr. Robert Kaplan, Acting Regional Administrator
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (R-19J)
Chicago, Illinois 60604-3507

Dear ~~Mr. Kaplan~~: Bob –

I wanted to take a moment to thank you and the Region 5 staff for all your continued support over the past several months regarding PFAS contamination in Michigan. We welcome and appreciate your collaboration and offer to cooperate on addressing identified PFAS sites with us. We, like you, believe that working together on this emerging contaminant is the best course of action. By pooling our talent, capabilities, knowledge, and actions, we can ensure we are all on the same page and maximizing federal and state resources most efficiently. In the spirit of this cooperation, we certainly appreciated the opportunity to review the draft 104(e) letter that the United States Environmental Protection Agency (USEPA) sent on December 1, 2017, to Wolverine Worldwide, Inc. (WWW).

As we move forward, I look forward to working cooperatively with you and the new Region 5 Administrator to determine courses of action for these sites. We certainly welcome your team's involvement and expertise to provide support where we may need it.

To that end, below are areas that the Michigan Department of Environmental Quality (MDEQ) team identified where assistance from the USEPA would be useful:

1. Funding assistance for the MDEQ laboratory to acquire necessary equipment to conduct PFAS analysis on water and soil samples.
2. Do a national survey of all available and certified laboratory analysis protocols.
3. Certification of whole house filter systems for PFAS (PFOA, PFOS, PFHxS).
4. 3-D modeling of groundwater data at the WWW disposal facilities – plumes – as remedial investigation data becomes available. (Note: This should be a responsible party action.)
5. Partnering for review of work plans. (Note: This is already happening for WWW in the Grand Rapids area.)
6. Assistance in investigation of potential WWW dump sites outside of Kent County.

7. Agreement between the state and USEPA on protocols for data sharing regarding personal identifiable information and ability to share that data between the USEPA and the MDEQ, as well as with the Michigan Department of Health and Human Services and other state departments.
8. Request the USEPA research and develop national recommendations related to PFAS foam on lakes. This could also be part of a Midwest state discussion in the future.
9. Need national, enforceable cleanup criteria and Safe Drinking Water Standards for PFAS compounds, including PFAO, PFOS, PFHxS, and other commonly found congeners – IRIS level review of data and development of criteria.
10. Share the WWW response to your 104(e) letter and collaborate on next steps.
11. Support for requiring the United States Department of Defense to conduct investigations and remediation of PFAS contamination on and off base, as it relates to military installations – whether active or inactive.

Again, thank you for continuing to work collaboratively with the State of Michigan and the MDEQ. We appreciate your support and assistance. As always, if you have any questions regarding either the status of our activities or the above ideas for assistance, please give me a call.

Sincerely,

Heidi

C. Heidi Grether
Director
517-284-6712

cc: Ms. Carol Isaacs, Governor's Office
Mr. Scott Hiipakka, Governor's Office
Ms. Susan Leeming, External Relations Deputy Director, MDEQ
Ms. Kathleen Shirey, MDEQ
Mr. Nate Zimmer, MDEQ
Ms. Amy Peterson, MDEQ