STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

RICK SNYDER
GOVERNOR

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June 14, 2012

Ms. Nuria Muniz
National Priorities List Coordinator
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3507

US EPA RECORDS CENTER REGION 5
434900

Dear Ms. Muniz:

SUBJECT: Preliminary Assessment Recommendation for the Wolverine World Wide Former Tannery Site, U.S. EPA ID No. MIN000510613

The Wolverine World Wide Former Tannery site is a former tannery operation that operated from 1908 to 2010. The site was operated by and is currently owned by Wolverine World Wide (WWW). The site is located along the east bank of the Rogue River in a residential/commercial area of the city of Rockford, Michigan. A designated recreational trail is located on the west side of the site along the bank of the Rogue River. A limited environmental investigation of the site has documented releases of tannery related wastes including hexavalent chromium. The company has demolished most of the plant buildings and has reported that they have removed some wastes from the site. The waste contaminant concentrations, however, were never documented and confirmation samples were never collected after the removal of the wastes. There are four known source areas that are relatively small but the full extent of these areas has not been determined.

Groundwater samples from on-site monitoring wells have indicated an observed release of contaminants from the site to the groundwater. All residents within the 4-Mile Target Distance Limit (TDL) utilize groundwater for drinking water. Residents in the immediate vicinity of the site are served by the city of Rockford municipal system which utilizes groundwater wells located approximately one mile southeast of the site.

Analysis of sediment samples collected from the Rogue River adjacent to the site has indicated an observed release of contaminants to the surface water pathway. The surface water pathway includes Rum Creek which flows through the site, the Rogue River downstream of the site, and the Grand River downstream of its confluence with the Rogue River. The surface water pathway is used for recreation and fishing, and there are several miles of wetland frontage and several state and federal threatened and endangered species located within the 15-Mile TDL.

There is no documented evidence of adverse population exposure to soil contamination at the site. The main area of the former plant that was demolished is covered with topsoil and is fenced to restrict access. Analyses of soil samples from the west side of the site in the area of the recreational trail have revealed some elevated levels of contamination. Visual observations from along the bank of the river in this area noted waste material, such as leather and shoe scraps, tannery building flooring brick, and concrete rubble are present.

There are no documented samples that indicate air contamination originating from the site. Also, there is a limited potential for air migration of contaminants via windblown particulates or gas migration from the site due to the site being fairly well vegetated.

Due to the documented releases of contaminants to the groundwater and surface water pathways, the limited data evaluating only a portion of the site, and the history of the site and site operations, the site does qualify for further Superfund Site Assessment activities. However, WWW has indicated in a letter to the Michigan Department of Environmental Quality (MDEQ), dated June 11, 2012 (see enclosure), that they plan to proceed with further site investigation and remediation activities under Section 14b of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Proceeding in this manner will require WWW to submit response activity plans to the MDEQ for review and approval. WWW also stated that they are willing to discuss with the MDEQ and U.S. Environmental Protection Agency (U.S. EPA) the scope of any needed site investigation work.

Given that WWW has committed to working under Section 14b of Part 201, MDEQ staff recommends that the site be designated as "Other Cleanup Activity." It is our understanding that the U.S. EPA wants to see progress toward investigation and remediation and a continued commitment from WWW for this designation to remain in effect. If at any time in the future the U.S. EPA determines that actions at the site are not effectively remediating contamination concerns at the site, the MDEQ will work with the U.S. EPA and WWW to either address the issues or possibly redesignate the site's status in the Superfund Site Assessment process.

Please contact me if you have any questions regarding this recommendation. Any questions you may have regarding the Preliminary Assessment may be directed to Mr. Joseph Walczak, Brownfield Assessment Program Manager, Site Assessment and Site Management Unit, Superfund Section, Remediation Division, at walczakj@michigan.gov or 517-335-2151.

Sincerely,

Daria W. Devantier

Daria W. Devantier, Chief
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Enclosure
cc: Mr. David Kline, MDEQ
Mr. Joseph Walczak, MDEQ
Site Files – Wolverine World Wide Former Tannery, Kent County