UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

12-01-17

REPLY TO THE ATTENTION OF:
SR-6J

BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Christopher Hufnagel, Senior Vice-President
Wolverine Worldwide, Inc.
9341 Courtland Drive N. E.
Rockford, Michigan 49351

Re: Request for Information Pursuant to Section 104 of CERCLA for Wolverine Worldwide Waste Disposal Areas in and around Kent County Michigan

Dear Mr. Hufnagel:

This letter seeks Wolverine Worldwide, Inc.'s (hereafter, "Wolverine's," or "your") cooperation in providing information and documents relating to the generation of hazardous substances, pollutants and contaminants, and the disposal of such hazardous substances, pollutants or contaminants at certain disposal areas in and around the City of Rockford and Kent County, Michigan, including, but not limited to, the disposal area adjacent to House Street in Belmont, Michigan, and the former Wolverine tannery at 123 Main Street and surrounding areas in Rockford, Michigan (hereafter the "Wolverine Disposal Sites" or "Sites," unless a specific question or request is by its terms directed to a specific disposal site).

We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and attached questions (Attachment B) within twenty (20) days of your receipt of this letter.

The United States Environmental Protection Agency (" EPA" or "the Agency") is investigating the release or threat of release of hazardous substances, pollutants, or contaminants at and from the Wolverine Disposal Sites. EPA is seeking to obtain information concerning the generation, storage, treatment, transportation, and methods used to dispose of such substances that have been, or threaten to be, released from the Sites. EPA reserves its authority to study the effects of these substances on the environment and public health. In addition, EPA reserves its authority to identify activities, materials, and parties that contributed to contamination at the Sites. EPA believes that you have information that may assist the Agency in its investigation of the Sites.

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EPA performed a Site Assessment at the former Wolverine tannery at 123 N. Main Street, Rockford, Michigan (the "Tannery Site") during 2011-2012. At that time, EPA observed the presence of what appeared to be scrap leather in and on soils adjacent to the Tannery Site and along the Rogue River. EPA also issued a request for information under CERCLA Section 104(e) to Wolverine in March, 2012, regarding, among other things, past waste disposal practices at the Tannery Site. Upon issuing the Site Assessment report, EPA transferred the Tannery Site to the Michigan Department of Environmental Quality for the exercise of other cleanup authority. In 2017, EPA became aware that the chemical compound perfluorooctane sulfonic acid ("PFOS") or related compounds had been discovered in well water at an area adjacent to a closed waste disposal location in Belmont, Michigan and that Wolverine Worldwide or its predecessor had used this location for disposal of process wastes. EPA has also become aware that Wolverine may have disposed of process wastes at other locations.

Description of Legal Authority

The federal "Superfund" law (the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601, et seq., commonly referred to as "CERCLA" and "Superfund") gives EPA the authority to, among other things: (1) assess contaminated sites, (2) determine the threats to human health and the environment posed by each site, and (3) clean up those sites in the order of the relative threats posed by each.

Information Request

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), U.S. EPA has broad information gathering authority which allows U.S. EPA to require persons to furnish information or documents relating to:

(A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility, or transported to a vessel or facility.

(B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.

(C) Information relating to the ability of a person to pay for or to perform a cleanup.

While EPA seeks your cooperation in this investigation, compliance with the Information Request is required by law. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law. Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to requests for submissions of required information.

Your responses to EPA's March 2012 Information Request require follow-up. In issuing this information request, U.S. EPA expressly reserves its authority to seek complete and accurate

responses to the March 2012 Information Request, and to exercise its authority to request civil penalties as appropriate.

Some of the information EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise . EPA of that fact by following the procedures outlined in Attachment A, including the requirement for supporting your claim for confidentiality.

If you have information about other parties who may have information which may assist the Agency in its investigation of the Site or may be responsible for the contamination at the Site, that information should be submitted within the time frame noted above.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501 et seq.

Instructions on how to respond to the questions in Attachment B to this document are described in Attachment A. Your response to this Information Request should be mailed to:

U. S. Environmental Protection Agency
Valerie Mullins, Enforcement Specialist
Emergency Enforcement & Support Section, SE-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

If you have additional questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Michael Berkoff, Regional Program Manager at (312) 353 8983. However, if you have specific questions about the Information Request, please contact Valerie Mullins, Enforcement Specialist at (312) 353-0324. Legal questions may be addressed to Thomas Williams, Regional Counsel at (312) 886-0814.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,

Joan Tanaka

Joan Tanaka, Chief
Remedial Response Branch#1

Enclosures

cc:

John Byl, Esq.
Warner, Norcross & Judd LLP
900 Fifth Third Center
111 Lyon Street N. W.
Grand Rapids, Michigan 49503

Kathleen Shirey, Acting Director
MDEQ RRD
P.O. Box 30426
Lansing, MI 48909-7926

Susan Leeming
MDEQ RRD
P.O. Box 30426
Lansing, MI 48909-7926

Attachment A
Information Request
to **Wolverine Worldwide, Inc.**

Instructions

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.

2. Number Each Answer. Precede each answer with the corresponding number of the question and the subpart to which it responds.

3. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.

4. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.

5. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to EPA.

6. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42.U.S.C. ï ï 9604(e)(7)(E) and (F), and Section 3007(b) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. ï 6927(b), and 40 C.F.R. ï 2.203(b).

If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

1. the portions of the information alleged to be entitled to confidential treatment;

2. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);

3. measures taken by you to guard against the undesired disclosure of the information to others;

4. the extent to which the information has been disclosed to others; and the precautions taken in connection therewith;

5. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and

6. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents, is in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e) of CERCLA. If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

7. Disclosure to EPA Contractor. EPA may disclose any information that you submit in response to this Information Request to authorized representatives of the United States, pursuant to 40 C.F.R. i 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA may disclose all responses to this Information Request to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information that you assert is entitled to treatment as confidential business information, you may

comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

8. Personal Privacy Information. Personnel and medical files, and similar files, the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."

9. Objections to Questions. If you have objections to some or all the questions within the Information Request letter, you are still required to respond to each of the questions.

Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "**arrangement**" means every separate contract or other agreement between two or more persons, whether written or oral.

2. The term "**documents**" includes any written, recorded, computer-generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control, or known by you to exist, including originals, all prior drafts, and all non-identical copies.

3. The term "**hazardous substance**" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances, or pollutants or contaminants.

4. The term "**identify**" means, with respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with title, position or business.

5. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term "**identify**" means to provide its full name, address, and affiliation with the individual and/or company to whom/which this request is addressed.

6. The term "**material**" or "**materials**" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

7. The term "**person**" shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.

8. The term "**pollutant or contaminant**" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations; except that the term "pollutant or contaminant" shall not include petroleum. The term "pollutant or contaminant" shall include that family of chemical compounds commonly known as per- and polyfluor alkyl substances or "PFAS," including perfluorooctane sulfonic acid or "PFOS," and waste Scotchgard.™

9. The term "**real estate**" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

10. The term "**release**" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.

11. The term "**House Street Site**" shall mean the former waste disposal area located at and adjacent to 1855 House Street, Belmont, Michigan.

12. The term "**Tannery Site**" shall mean the former Wolverine tannery located at 123 N. Main Street, Rockford, Michigan, and adjacent areas at which waste leather from Wolverine's processes was placed.

13. The term "**waste**" or "**wastes**" shall mean and include trash, garbage, refuse, by-products, discarded off-specification products and raw materials, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

14. The term "**you**" or "**Respondent**" shall mean Wolverine Worldwide, Inc., the company to whom this information request is addressed.

Attachment B
Wolverine Worldwide, Inc.
Requests

A. General Requests

1. Identify all **persons** consulted in the preparation of the answers to these Information Requests.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

4. List all EPA Identification Numbers of the Respondent and EPA or state identification numbers of any areas Respondent used for waste storage or waste disposal in Rockford, Michigan, and within a 70-mile radius of Rockford, Michigan. If there are no identification numbers for such areas, provide their addresses.

5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants, and damages resulting therefrom in Rockford, Michigan, and within a 70-mile radius of Rockford, Michigan.

6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal, or other handling of hazardous substances, pollutants or contaminants by you, your contractors, or by prior owners and/operators in Rockford, Michigan, and within a 70-mile radius of Rockford, Michigan.

7. Provide the correct name and addresses of your domestic (i.e., in United States) plants, facilities, and other buildings or structures where Respondent carried out its manufacturing, waste treatment, and waste accumulation and waste disposal/operations prior to January 1, 2012 (excluding locations where ONLY administrative and clerical or office work was performed).

8. If available, provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations at its facilities located in Rockford, Michigan and within a 70-mile radius of Rockford, Michigan.

9. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers with associated site addresses issued to Respondent by EPA or a state for Respondent's operations.

10. Provide copies of any National Pollutant Discharge Elimination System (NPDES) permits issued for facilities owned and/or operated by Respondent for the last ten years the facilities were in operation.

11. Provide all sampling analytical results for the media identified in this request, in Microsoft Excel® format where possible, including the location from which the sample was taken, the media of the sample, the date the sample was taken, the date the sample was analyzed, the analytical method used, the laboratory that performed the analysis, and the resulting constituent concentrations. Please also provide all laboratory reports for these samples in searchable portable digital format (pdf).

B. Questions Regarding the Operations and Waste Practices at the Facility Located at 181 North Main Street, Rockford, Michigan (Tannery Site)

12. Provide a description of Respondent's operations at the Tannery Site, including:

    a. the dates such operations commenced and concluded; and
    b. the types of work performed at each location on the premises at the Tannery Site, including but not limited to the industrial, chemical, or institutional processes undertaken at each location. Include in your response the tanning, coloring and finishing activities identified in your May 2012 Information Request Response to EPA.

13. Identify and describe the points in your manufacturing process at which Scotchgard™, or water proofing, or stain resistant, or other Per/Polyfluoroalkyl Substances (PFAS)-containing coatings was or were applied to animal hides, or leather, or synthetic materials, or finished products (for example, whether coating was applied to raw leather or hides or synthetic materials before such material was cut for creating products such as shoes and boots, or after products were created). If the point of application changed over time, please provide dates of such changes and what changes were made.

14. Describe the process or method by which Scotchgard™, or water proofing, or stain resistant, or other PFAS-containing coatings was or were applied to animal hides or leather, or synthetic materials or finished products, e.g., by roller, spray applicator, etc. If the process or method of application changed over time, please provide dates of such changes and what changes were made.

15. List the types of raw materials and coatings used in Respondent's former operations at the Tannery Site, including the products and/or materials manufactured, recycled, recovered, treated, or otherwise processed in these operations.

16. Provide copies of Material Safety Data Sheets (MSDS) for materials used in Respondent's operations at the Tannery Site that were not provided in your May 2012 Information Request Response to EPA.

17. For each type of waste (including by-products) from Respondent's operations at the Tannery Site, including but not limited to all liquids, sludges, and solids, provide the following information:

    a. its physical state;
    b. its nature and chemical composition;
    c. its color;
    d. its odor;
    e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
    f. the dates (beginning and ending) during which each type of waste was produced by Respondent's operations.

18. Provide any waste characterization determinations, including any analytical information documented, for any waste stream generated from Respondent's operations at the Tannery Site identified your response to question 15, above.

19. Identify which part of Respondent's operations at the Tannery Site generated each type of waste, including but not limited to wastes resulting from spills of liquid materials and wastes generated by cleaning and maintenance of equipment, inventory cleanout, off-specification determined wastes, and machinery.

20. Describe how process wastes generated at the Tannery Site, including non-liquid wastes, scrap leather and animal hide, scrap synthetic materials, off-specification product, by-products, floor sweepings, scrap metal, waste dyes, degreasers, parts cleaners, sludges (including waste water treatment and air pollution control sludges), rags and wipes, used oil, and any waste streams that were generated by and received from any off-site source, were gathered, stored and treated pending disposal. Include in your response:

    a. any practices, if any, for segregating Scotchgard™, or water proofing, or stain resistant, or other PFAS-containing coatings from all other wastes;
    b. for the period beginning with the operation of the wastewater treatment plant, a description of how all process wastes were conveyed to that plant; and
    c. information regarding waste gathering, storing and treatment practices that pre-date installation of the wastewater treatment plant.

21. With respect to the placement of scrap leather, or animal hide scrap synthetic material, or off-specification product on or in soils and sediments at and adjacent to the Tannery Site, provide the following information:

    a. during what period(s) of operations at the Tannery Site did such placement occur, and
    b. had any such scrap leather, animal hide, or scrap synthetic material or off-specification product been treated with or received application of Scotchgard™, or water proofing, or stain resistant, or other PFAS-containing coatings before such placement?

22. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operations at the Tannery Site, including but not limited to:

    a. the types of materials spilled in Respondent's operations;
    b. the materials used to clean up those spills;
    c. the methods used to clean up those spills; and
    d. where the materials used to clean up those spills were disposed of.

23. Describe the cleaning and maintenance of the equipment and machinery involved in your operations, including but not limited to:

    a. the types of materials used to clean and maintain this equipment/machinery,
    b. the monthly or annual quantity of each such material used,
    c. the disposition of those materials used in cleaning equipment, and
    d. where the materials are/were disposed of.

24. For the period predating and following the construction and operation of the wastewater treatment plant, describe how each type of waste generated at the Tannery Site was accumulated prior to disposal, recycling, sale or off-site transport, including:

    a. the type of container in which each type of waste was placed and/ or stored; and
    b. where each type of waste was accumulated or stored.

25. Was there ever a spill, leak, release or discharge of hazardous materials, hazardous substances, pollutants or contaminants into any subsurface disposal system or floor drain inside or under the building(s) at the Tannery Site? If the answer to the preceding question is anything but an unqualified "no," identify:

    a. where the disposal system or floor drains were located;
    b. when the disposal system or floor drains were installed;
    c. whether the disposal system or floor drains were connected to pipes;
    d. where such pipes were located and emptied;
    e. when such pipes were installed;
    f. how and when such pipes were replaced, or repaired; and
    g. whether such pipes ever leaked or in any way released hazardous substances, pollutants or contaminants into the environment.

26. Did any leaks, spills, pumping, dumping, pouring, injecting, emptying, disposing or releases of hazardous materials, hazardous substances, pollutants or contaminants occur on the Tannery Site when such materials were being:

    a. delivered by a vendor;
    b. stored;
    c. treated; or
    d. transferred to an agent or contractor for disposal.

Include with your response copies of any documents that you have that provide information regarding such releases, and persons' names and last known addresses who may have knowledge of such information.

27. Provide any release reports that you have made pursuant to Section 103(a) of CERCLA and Section 304 of the Emergency Planning and Community Right-to-Know Act (EPCRA) to any local, state or federal agency for releases of hazardous materials, hazardous substances, pollutants or contaminants at the Tannery Site.

28. Was a state or federal Clean Air Act installation or operation permit issued for any area or source at the Tannery Site? If so, please provide a copy of the most recent one.

29. Identify:

    a. any air pollution controls attached to each process at the Tannery Site, including the date the control started operating; common name of the equipment; the size of the equipment (for example CFM of a baghouse); the control efficiency; and the manufacturer of the equipment; and
    b. all points in the Tannery Site's production process that potentially created air emissions of Scotchgard™, or water proofing, or stain resistant, or other PFAS-containing coatings, and the specific air pollution control associated with them, if any.

30. Provide copies of the following air reports, pertaining to operations of the Tannery Site, for the last ten years the Tannery Site was in operation:

    a. excess emissions reports;
    b. emissions inventory reports;
    c. variances from permit limits or regulatory requirements, or permit exemptions issued by a regulatory agency; and
    d. any other reports submitted for air pollution compliance purposes.

31. Identify all individuals who had responsibility for Respondent's environmental matters at the Tannery Site, e.g., responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, and for each such individual, provide his/her:

    a. job title;
    b. duties;
    c. period he/she performed those duties;
    d. his/her supervisor(s);
    e. his/her current position or the date of resignation; and
    f. the nature of the information he/she possesses or possessed regarding Respondent's waste management practices at the Tannery Site.

32. Describe the containers used to take each type of waste from the Tannery Site operation, including but not limited to:

    a. the type of container (e.g. 55-gallon drum, roll-off box, etc.);
    b. the colors of the containers or other identifying feature such as any distinctive stripes or other markings on them;
    c. any labels or writing on those containers (including the content of those labels);
    d. whether those containers were new or used; and
    e. if those containers had previously been used, a description of that prior use.

33. For each type of waste from the Tannery Site, describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling, and provide a copy of such contracts and other documents reflecting such agreements or arrangements.

34. Identify all entities and individuals who picked up waste from the Tannery Site or who otherwise transported the waste away from Respondent's operations at the Tannery Site. Include any individuals who were Respondent's employees and the names of any entities who were agents or contractors, and provide any documents that provide information regarding the dates, volumes, the nature of the materials and any location for disposal or treatment of those materials that were arranged for or transported for disposal from the Tannery Site.

35. Apart from the Tannery Site buildings' demolition in 2009-2010, has soil ever been excavated and stored at or removed from the Site? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:

    a. amount of soil excavated;
    b. the location of excavation;
    c. manner and place storage of excavated soil;
    d. dates of soil excavation;
    e. identities of persons or entities who excavated soil;
    f. reasons for soil excavation;
    g. all results of analysis of samples of soils excavated;
    h. whether soils contained hazardous substances, pollutants or contaminants; and
    i. results of analysis of post-excavation samples taken from area that was excavated.

C. <u>Questions Regarding Other Rockford, Michigan Operations and Waste Practices</u>

36. For any facilities in addition to the Tannery Site are also located in Rockford or Kent County, Michigan, describe any manufacturing, processing, and product finishing activities at each such facility, but do not include in your response any locations used solely for office, clerical and other business administrative activities, or for storage of finished products pending sale.

37. Did any manufacturing, processing or finishing activities at such facility or facilities

identified in your response to the proceeding request involve the generation, treatment, accumulation or storage pending disposal, of wastes that contained or may have contained Scotchgard™, or water proofing, or stain resistant or other PFAS-containing coatings?

38. If your answer to the preceding question is affirmative, then identify:

    a. when and where in the process the Scotchgard™, or water proofing, or stain resistant or other PFAS-containing coatings were applied;
    b. a description of all the waste streams, whether or not they included Scotchgard™, or water proofing, or stain resistant or other PFAS-containing coatings;
    c. how such waste streams were treated, stored, accumulated and disposed of;
    d. if disposed of off-site, where such disposal occurred; and
    e. whether disposal ever occurred at the same locations at which Respondent disposed of, or arranged for the disposal of, wastes from the Tannery Site.

39. Provide copies of the most recent state or federal Clean Air Act installation or operation permits issued for any area or source at any facility owned and/or operated by Respondent in the vicinity of Rockford, Michigan. In addition, identify:

    a. any air pollution controls attached to each process at each facility for which a Clean Air Act permit was issued, including the date the control started operating; common name of the equipment; the size of the equipment (for example CFM of a baghouse); the control efficiency; and the manufacturer of the equipment; and
    b. all points in production process at each facility for which a Clean Air Act permit was issued that potentially created air emissions of Scotchgard™, or water proofing, or stain resistant, or other PFAS-containing coatings, and the specific air pollution control associated with them, if any.

D. <u>Questions Regarding the House Street Site</u>

40. Describe the nature of your activities or business at the House Street Site, with respect to, processing, storing, treating, disposing, or otherwise handling hazardous substances, pollutants or contaminants.

41. State the dates during which you owned, operated, and/or leased the House Street Site, and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g., deeds, leases, etc.).

42. Provide information about the House Street Site, including but not limited to the following:

    a. Property boundaries, including a written legal description;
    b. Location of underground utilities (telephone, electrical, sewer, water main, etc.);
    c. Surface structures (e.g., buildings, tanks, etc.);
    d. Ground water wells, including drilling logs;

e. Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s), and other underground structures; and where, when and how such systems are emptied;
f. any and all additions, demolitions, or changes of any kind on, under, or about the Site, to its physical structures, or to the property itself (e.g., excavation work); and any planned additions, demolitions, or other changes to the House Street Site; and
g. All maps and drawings of the Site in your possession.

43. Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on the House Street Site. For each such solid waste unit identified, provide the following information:

    a. The unit's boundaries and the location of all known solid waste units whether currently in operation or not;
    b. The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;
    c. The dates that the unit was in use;
    d. The purpose and past usage (e.g., storage, spill containment, etc.);
    e. The quantity and types of materials (hazardous substances, pollutants, contaminants and/or any other chemicals) located in each unit;
    f. Any data resulting from sampling of the materials in the unit; and
    g. The construction (materials, composition), volume, size, dates of cleaning, and condition of each unit.
    h. If the unit is no longer in use, how was such unit closed and what actions if any were taken to prevent or address potential or actual releases of waste constituents from the unit.
    i. If any media were sampled during closure, provide all data collected relating to materials in that unit.
    j. If material was ever removed from a unit, what is the disposition of that material? Was it transported or moved to a different unit at the House Street Site or to a unit at another location?

44. Identify the House Street Site's current owner and that entity's or individual's relationship to Respondent, if any.

45. Provide any information indicating in any way that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the House Street Site during the period prior to which Respondent owned, operated and/or leased the House Street Site.

    a. If an actual release occurred, please describe any and all response activities initiated to address the release.

46. Provide any information indicating in any way that hazardous substances, pollutants or contaminants were placed at the House Street Site following the date upon which

Respondent, its agents or contractors ceased placing or disposing wastes at the House Street Site.

47. Provide copies of all local, state, and federal permits ever granted for waste treatment, storage or disposal at the House Street Site or any part thereof (e.g., RCRA permits, NPDES permits, etc.).

48. Did the House Street Site ever have "interim status" under RCRA?

49. Did the Respondent ever file a notification of hazardous waste activity regarding the House Street Site under RCRA? If so, provide a copy of such notification.

E. Questions Regarding Wolverine Disposal Sites other than the House Street Site

50. In addition to the House Street Site, identify all locations, by address and owner, where Respondent disposed of wastes that contained Scotchgard™ or other PFAS-related compounds, regardless of date. Include in your answer the results of any analyses you or your contractors or agents performed or arranged to have performed on groundwater, drinking water, surface water, soils and sediments at all such locations.

F. Questions Regarding Respondent's Current Response Actions in Rockford, Michigan

51. Provide all reports, information, sample analysis, laboratory results, or data related to soil, sediment, sludges, water (ground and surface), drinking water, air quality and geology/hydrogeology prepared by you or at your direction regarding the House Street Site. Include all documents containing analysis or interpretation of such data, and any past and current aerial photographs of the House Street Site.

52. Provide a copy of all workplans prepared by you or at your direction that identify sampling and analytical procedures to be observed or employed by your contractors, including laboratories, for sampling of any medium (soil, groundwater, etc.) taken or to be taken at or in the vicinity of Rockford, Michigan.

53. Provide a copy of all figures or maps prepared by you or at your direction that show the locations for samples collected or to be collected at the House Street Site and areas in the vicinity of Rockford, Michigan by you or your contractors. Additionally, explain how these sampling locations have been selected.

54. Provide a copy of all figures or maps prepared by you or at your direction that show the locations or addresses at which owners or tenants or property in the vicinity of Rockford, Michigan have been provided bottled water, or have had water filters installed, or have received any other form of alternate drinking water.

55. Identify the constituents for which you have performed or arranged for the performance of sample analysis for samples taken from the House Street Site and sampling locations in its vicinity in each of the following media:

a. Drinking water
b. Groundwater
c. Surface water
d. Soil
e. Sediments
f. Sludges

56. Describe any community engagement activities you have conducted regarding contamination at in the vicinity of Rockford, Michigan. Provide copies of documents or correspondence provided to residents regarding contamination at the House Street Site and/or PFAS drinking water contamination in the vicinity of Rockford, Michigan.

57. Identify any areas or specific locations in addition to the House Street Site and its vicinity at which you or your contractors are sampling and testing residential drinking water. Include a map in your response that shows these areas, and indicate in your response how these areas or locations were or are being selected (e.g., whether they are adjacent to or near other waste disposal areas, are in the vicinity of air deposition fall out, etc.).

58. Identify all public water systems as defined in 40 CFR § 141.2 (community water systems, non-community water systems, etc.) in the vicinity of the House Street Site, the Tannery Site, other manufacturing facilities, or other locations in Kent County, Michigan that you have sampled for Scotchgard™ or other PFAS-related compounds. Indicate in your response:

    a. which ones were tested and the results of sampling analysis;
    b. whether any public water systems declined to allow such sampling.

59. Indicate whether the laboratory or laboratories conducting the analyses on water samples is (are) using EPA Method 537 or a modified version thereof. If the latter, indicate what modifications have been made to EPA Method 537, and identify how these changes affect data quality.

60. Indicate whether you are performing or arranging for performance of re-testing or confirmation sampling for residential well water where analytical results show PFAS-related compounds, singly or in combination, in concentrations at or near 70 parts per trillion (ppt) and, if so, the concentration that is being used for determining whether to collect re-testing or confirmation samples.

61. With respect to water filters you or entities or persons acting at your direction have installed in residences or public water supplies identify:

    a. The filters' designer, and whether that person or entity has a professional engineer's license issued by the State of Michigan;
    b. The identities of persons or entities that are installing the filters, and whether they have engineer's license issued by the State of Michigan or other qualifications;

c. The methods by which the persons or entities installing the filters do this work, including whether there is sampling before and after installation and if so, the analytical parameters, evaluation of water pressure, water flow in piping, gathering information about water usage;
d. Whether anything is provided or installed in addition to the filter (e.g., treatment media such as chlorine);
e. Whether residences given filters are given contact information to report issues or pose questions;
f. Any releases or other documents residence occupants are given to review and/or sign; and
g. A description of how such filters are to be maintained, and who performs such maintenance.

bcc: Jaqueline Clark, ORC (C-14J)
Thomas Williams, ORC (C-14J)
Gillian Asque, ORC (C-14J)
Jennifer Wilson, (WG-15J)
Kimberly Harris, (WG-15J)
Erin Newman, (AT-18J)
Bryan Gangwisch, (LR-17J)
Nuria Muniz, (SR-6J)
Erica Aultz, (SR-6J)
Michael Berkoff, (SR-6J)
Valerie Mullins, (SE-5J)
Carolyn Bohlen, (SE-5J)
John Maritote, (SE-5J)
Lillie Young, (SE-5J)
Records Center, (SRC-7J)

Site Name: WOLVERINE WORLDWIDE, INC.
Site I.D. Number: Pending
Site Status*: Active