## STATE OF MICHIGAN



## DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT

REBECCA A. HUMPHRIES

LANSING

June 7, 2010

Mr. Farsad Fotouhi, Corporate Vice President Environmental Engineering Pall Corporation 600 South Wagner Road Ann Arbor, Michigan 48103

Dear Mr. Fotouhi:

SUBJECT: Compliance Evaluation Inspection (CEI)

NPDES Permit No. MI0048453

Pall Life Sciences Inc

On May 19, 2010, staff of the Department of Natural Resources and Environment (DNRE), Water Bureau conducted a Compliance Evaluation Inspection at the Pall Life Sciences (PLS) facility located at 600 South Wagner Road, Ann Arbor, Michigan. The purpose of the inspection was to evaluate the facility's compliance with National Pollutant Discharge Elimination System (NPDES) Permit No. MI0048453. I would like to thank you and your staff for your time and assistance during the inspection which included a site inspection, an interview, and records review.

At the time of inspection, the ozone treatment system was operating normally and the facility appeared well operated and maintained. The system has four ozone treatment units (three in operation and one for emergency back-up) with a capacity to treat 1.872 million gallons per day of contaminated groundwater. The treatment system is staffed with three full-time operators. There is also one full-time laboratory staff and one full-time sampling staff. An autodialer system notifies the operators of problems after hours. The operation and maintenance of the treatment system appears excellent. Bulk chemical storage for hydrogen peroxide and sodium bisulfite has adequate secondary containment with controls in place to help ensure safety when transferring chemicals from tanker trucks to the bulk tanks. Treated wastewater is discharged to the green pump house where composite and grab samples are collected by the operators. The operators analyze grab samples for hydrogen peroxide and pH using approved methods. Composite samples for 1.4-Dioxane and Bromate are analyzed in the laboratory. Upon inspection, the effluent at the unnamed tributary of Honey Creek appeared normal (i.e. slightly turbid due to the iron content of the groundwater). A review of discharge monitoring reports for the past twelve months indicates excellent compliance with NPDES effluent limitations. No violations were reported during this time period.

PLS' NPDES Permit was recently reissued and takes effect October 1, 2010. You are reminded that the new permit no longer contains Storm Water Pollution Prevention Plan language. The new permit also no longer requires sampling for chronic toxicity or oxalic acid. All other requirements essentially remain the same.

Mr. Farsad Fotouhi, Corporate Vice President Page 2 of 2 June 7, 2010

As a result of this inspection, PLS was found to be in compliance with the terms and conditions of its NPDES Permit. We appreciate your efforts to maintain compliance.

No written response to this inspection summary is necessary. If you have any questions or comments regarding this letter, please contact me at the number below; SnellD@Michigan.gov; or DNRE, 301 East Louis Glick Highway, Jackson, Michigan 49201-1556.

Sincerely,

Debora Snell, Environmental Quality Analyst

Jackson District Office

Delson Snell

Water Bureau 517-780-7929

DS/CH

cc: Ms. Sybil Kolon, Remediation and Redevelopment Division, DNRE-Jackson District Office File: Pall Life Sciences, MI0048453, Correspondence, Washtenaw County



JUN 7 2010

MDEQ - RRD JACKSON DISTRICT OFFICE