## JENNIFER M. GRANHOLM GOVERNOR

## STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

JACKSON DISTRICT OFFICE



April 5, 2005

Mr. Farsad Fotouhi Environmental Manager Pall Life Sciences, Inc. 600 South Wagner Road Ann Arbor, MI 48103-9019 Mr. Alan D. Wasserman Williams Acosta, PLLC 2430 First National Bank Building Detroit, MI 48226-3535 Mr. Michael L. Caldwell Zausmer, Kaufman, August & Caldwell, P.C. 31700 Middlebelt Road, Suite 150 Farmington Hills, MI 48334

Dear Sirs:

SUBJECT: Gelman Sciences, Inc. Remedial Action - Western System Status Report, Jan. 17, 2005

We delayed our response to the above referenced submittal until we had received an updated potentiometric surface contour map (March 8, 2005) and to allow us to discuss our concerns with you during a meeting on March 21, 2005.

As we discussed, we do not believe the two borings (BHMW-92 and MW-93) completed as part of this investigation adequately define the extent of contamination. In addition, the report recommends continued monitoring and continued batch extraction as the only response activities. The report also states that current trends show that the 1,4-dioxane concentrations will be below 85 parts per billion (ppb) by January 2006. The Department of Environmental Quality (DEQ) has not recently evaluated these trends; however, the DEQ has not agreed with previous trends presented by Pall Life Sciences (PLS) for the Western System.

In addition, we do not know if the highest concentrations of 1,4-dioxane in the Western System have been identified. Therefore, even if the trend PLS has calculated is correct, it is accurate only for the location of the Ann Arbor Cleaning Supply Well. As stated in the enclosed Interoffice Communication from Mr. Leonard Lipinski, dated April 4, 2005, we are requesting two additional monitoring wells to help define the extent of contamination. Depending on the results from these monitoring wells, it is possible that additional monitoring wells will be needed in the future.

As you know, the Opinion and Remediation Enforcement Order issued by the Washtenaw County Circuit Court on July 17, 2000, required that this area meet the generic residential cleanup criterion of 85 ppb for 1,4-dioxane in groundwater by July 2005. Based on PLS's analysis that the contamination will exceed this criterion until January 2006, we presume that PLS will be prepared to address any questions the Court may have regarding its deadline.

Please inform us of your intentions to install the requested monitoring wells by April 20, 2005 and notify us at least three days prior to beginning field work. Please contact me at 517-780-7937, if you have any questions or would like to discuss these issues in more detail.

Sincerely,

Sybil Kolon
Environmental Quality Analyst
Gelman Sciences Project Coordinator
Remediation and Redevelopment Division

SK/KJ Enclosure

cc/enc: Ms. Mary Ann Bartlett, Pall Corp.

Mr. Robert Reichel, DAG

Mr. Mitchell Adelman, DEQ/Gelman File

Mr. Leonard Lipinski, DEQ