

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

TO: Sybil Kolon, Pall Life Science (PLS) Project Manager
Remediation and Redevelopment Division
Jackson District Office

FROM: Jim Coger, Geologist
Remediation and Redevelopment Division (RRD)
Jackson District Office

DATE: March 27, 2008

SUBJECT: Review of the PLS, January 8, 2008, Plan for Modification of Purging Frequency
Western System

I have reviewed the subject PLS submittal. I do not concur with PLS's proposal to amend the purging schedule in the Ann Arbor Cleaning Supply Well (A²CSW).

As noted in the Background Section of the submittal, PLS acknowledges that the precise area of the remaining 1,4-Dioxane plume is not known. The remedial investigation activities conducted by PLS to date, also have not determined the source of the Western System 1,4-Dioxane plume. I do not concur with PLS's statement that, "Available monitoring and boring data indicate the plume is limited horizontally and vertically". There are no monitor wells located upgradient from the A²CSW that establish the vertical and horizontal extent of 1,4-dioxane mass, that currently exceeds drinking water protection criteria.

Sufficient information was not provided by PLS, in the subject submittal, to evaluate what impact the decline in regional and local potentiometric elevations may have had on contaminant distribution. As referenced above, the source of 1,4-dioxane impacting the A²CSW has not been established. Extensive additional investigation would be required east and southeast of the A²CSW, to determine if downward trends in groundwater elevations potentially impact contaminant migration via changes in flow gradients and/or velocities.

I recommend that active remediation and batch purging continue, on at least a monthly basis, until we have a technical basis for determining a different course of action.

If you have any questions or comments, please let me know.

JC/KJ

cc: Mitch Adelman, RRD