

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY Jackson District Office



JENNIFER M. GRANHOLM GOVERNOR

February 4, 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, Unit E Plume Work Plan for Downgradient Groundwater Investigations dated October 7, 2004

We have reviewed the above referenced work plan. As indicated in the enclosed Interoffice Communication from Mr. Leonard Lipinski, dated February 3, 2005, the proposed work plan is generally adequate. Please incorporate Mr. Lipinski's comments in your implementation of the work plan. A few additional comments and clarifications are included below, and should also be incorporated.

The work plan states that the additional investigation will be done, if necessary, "... to demonstrate that the plume will not underflow the river". As stated in other parts of the work plan, the purpose of the additional investigation would be to determine if the plume will underflow the river. As Mr. Lipinski indicates, even if the plume does not underflow the river, the additional investigation(s) will need to determine the ultimate point of discharge of the plume into the river.

The work plan states that the borings will be drilled to "... depths sufficient to encounter bedrock". We interpret this to mean that the drilling will continue until bedrock is reached.

The work plan states that Pall Life Sciences (PLS) will discuss well installation plans with the Department of Environmental Quality (DEQ). As Mr. Lipinski indicates, it is expected that two wells will need to be placed at each location. Please keep Mr. Lipinski informed of the expected schedule for installation of wells and provide him with all of the pertinent data so that he may participate in these discussions in a timely manner.

As we have informed Mr. Fotouhi, there may be one or more wells at the former Eaton property at 315 S. First Street, which is in the vicinity of the proposed investigation. We have provided Mr. Fotouhi with the contact information for the new owner if PLS would like to obtain any information from these wells to supplement information obtained during the proposed investigation.

Task 5 of Part A is proposed to be performed to fill any data gaps using a minimum of one boring using the rotosonic drilling method. In the event that there are no data gaps to be filled, this could result in there being no rotosonic boring. The DEQ believes it is important to employ this drilling method as part of this investigation. Therefore, it may be advisable for PLS to use rotosonic drilling for one of the Part A, Task 1 borings.

Task 3 of Parts A and B list the monitoring wells from which water level data is to be collected. In addition to the monitoring wells listed, please also include MW-92.

Mr. Farsad Fotouhi Mr. Alan D. Wasserman Mr. Michael L. Caldwell

The schedule in Appendix 1 is acceptable, although it does not appear that any time has been allowed for obtaining access for the Part A, Task 1 borings and well installations. As you know, the City of Ann Arbor prefers that monitoring wells be placed on city property or in city rights-of-way. We encourage you to work with the city in this regard. Please inform us at least three days prior to beginning field work. Please contact me 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 517-780-7937

SK/KJ

Enclosure

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

Mr. Robert Reichel, Department of Attorney General

Mr. Mitchell Adelman, DEQ/Gelman File

Mr. Leonard Lipinski, DEQ

-2-