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January 9, 2018

Daniel Hamel
Michigan Department of Environmental Quality
Environmental Response Division
Jackson District Office Building
301 E. Louis Glick Highway
Jackson, Michigan 49210

Re: **Quarterly Progress Report**
4th Quarter, 2017
October 1, 2017 to December 31, 2017

Dear Mr. Hamel:

Please find enclosed the Quarterly Progress Report for the period of October 1, 2017 to December 31, 2017.

Should you have any questions regarding this document, please contact me at 386-562-0176.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Gelb", followed by a horizontal line.

Lawrence J. Gelb
Sr. Director Global EHS



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JACKSON DISTRICT OFFICE

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4th Quarter, 2017

(October, November, December)

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Summary of Activity

CEB = Central Environmental Building
C3 = C3 aquifer
D2 = D2 aquifer
E = E aquifer
SW = Southwest Property Area
Maple = Maple Road

Treatment Activities

10/01/17 - 10/10/17 - PW-1 (Marshy) was shut down for low flow.

10/03/17 - Treatment was shut down briefly for maintenance.

10/04/17 - TW-2 (C3) was shut down briefly due to a DTE Energy power loss in the area.

10/10/17 - 10/11/17 - TW-21 (D2), TW-20 (C3), TW-18 (E) were shut down to adjust the Pond level during maintenance on System 1A.

10/11/17 - 10/12/17 - LB-4 (D2) and TW-19 & TW-23 (E) were shut down due to a DTE Energy power loss in the area.

10/11/17 - 10/19/17 - TW-10 and TW-14 (C3) were turned on periodically to adjust the Pond level.

10/11/17 - 10/24/17 - TW-17 (E) was turned on periodically to adjust the Pond level.

10/12/17 - System 2A was shut down briefly for maintenance.

10/16/17 - TW-1 and TW-3 (C3) were turned on briefly for sampling.

10/16/17 - 10/17/17 - System 1A was shut down for maintenance.

10/17/17 - System 2A was shut down briefly for maintenance.

10/17-17 - 10/19/17 - TW-18 (E) was shut down for rehabilitation.

10/18/17 - TW-9 (D2) was turned on briefly for sampling.

10/20/17 - 10/30/17 - TW-20 (C3), PW-1 (Marshy), and SW extraction were shut down for a site investigation.

11/04/17 – LB-4 (D2), TW-19 & TW-23 (E) were shut down briefly due to a DTE Energy power loss in the area.

11/21/17 - TW-21 & LB-4 (D2), TW-20 (C3), PW-1 (Marshy), Southwest, and TW-18, TW-19, and TW-23 (E), and Treatment were shut down for maintenance.

11/22/17 – LB-4 (D2), TW-19 and TW-23 (E) were shut down briefly for maintenance.

12/4/17-12/8/17 - Extraction and Treatment were shut down for maintenance.

12/12/17 - TW-9 (D2) and TW-14 (C3) were turned on briefly to adjust the Pond level.

12/12/17-12/13/17 - TW-17 (E) was turned on briefly to adjust the Pond level. TW-19 and TW-23 (E) were shut down due to a DTE Energy power loss in the area.

12/31/17 - System 1A was shut down briefly for maintenance.

Field Activities

Upgrades to communications, wiring, plumbing and airlines.

Submittals/Responses

10/12/17	PLS submitted Discharge Monitoring Report (DMR) to DEQ
10/16/17	PLS submitted Monthly Monitoring Report (NPDES) to DEQ
10/19/17	PLS submitted 3 rd Quarter 2017 Report to DEQ
11/13/17	PLS submitted Discharge Monitoring Report (DMR) to DEQ; PLS submitted Monthly Monitoring Report (NPDES) to DEQ
12/12/17	PLS submitted Monthly Monitoring Report (NPDES) to DEQ PLS submitted Discharge Monitoring Report (DMR) to DEQ;

Anticipated Major Activities for the Next Quarter

- Complete Amendment to Consent Judgment
- Work with MDEQ to update the Monitoring Plan
- Replacement of two chemical tanks

Quarterly Performance Analysis

For the months of October, November, December 2017, over 200 pounds of 1,4-dioxane were removed and 61,745,486 gallons of water were extracted from the contaminated aquifers, treated and discharged. The total mass of 1,4-dioxane removed since May 1997 is over 93,775 pounds and the total volume of water discharged since May 1997 is over 8.1 billion gallons.

In general, the performance of the operation was as expected, purging and treating contaminated groundwater to the existing allowable capacities.

Mass Reduction

MASS REDUCTION SUMMARY
Mass Removed Per Month (lb)

A	B	C	D	E	F	G
Month	Mass Removed from Unit E Only	Mass Removed from Southwest Only	Mass Removed from Marshy Only	Mass Removed from Units C3 and D2 Only	Mass Removed from Unit D0	Total Mass Removed from Units E, D2, C3, D0, Southwest and Marshy
Aug-00	0	0	8	366		374
Sep-00	0	0	9	332		341
Oct-00	0	5	9	583		597
Nov-00	0	3	12	1160		1175
Dec-00	0	0	10	1040		1050
Jan-01	0	0	7	816		823
Feb-01	0	0	7	1056		1063
Mar-01	0	0	11	1379		1390
Apr-01	0	0	9	1140		1149
May-01	0	1	8	990		999
Jun-01	0	2	8	933		943
Jul-01	0	2	10	1121		1133
Aug-01	0	2	13	1018		1033
Sep-01	0	1	9	909		919
Oct-01	0	5	8	896		909
Nov-01	0	4	5	827		836
Dec-01	0	6	4	768		778
Jan-02	0	6	5	753		764
Feb-02	0	4	6	691		701
Mar-02	0	7	7	663		677
Apr-02	0	6	7	682		695
May-02	100	9	7	898		1014
Jun-02	94	9	6	889		998
Jul-02	56	10	7	640		713
Aug-02	53	8	6	745		812
Sep-02	51	8	6	860		925
Oct-02	33	6	4	603		646
Nov-02	57	8	5	880		950
Dec-02	48	9	5	842		904
Jan-03	45	8	6	839		898
Feb-03	37	6	6	767		816
Mar-03	44	8	7	763		822
Apr-03	39	8	3	716		766
May-03	36	13	5	725		779
Jun-03	34	15	5	683		737
Jul-03	29	15	5	678		727
Aug-03	31	15	6	676		728
Sep-03	27	16	5	644		692
Oct-03	34	17	5	701		757
Nov-03	26	12	5	663		706
Dec-03	29	14	6	635		684
Jan-04	28	15	6	667		716
Feb-04	8	11	5	485		509
Mar-04	23	14	7	573		617
Apr-04	27	15	6	537		585
May-04	16	10	5	439		470
Jun-04	21	11	5	499		536
Jul-04	36	12	5	506		559

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Aug-04	54	12	5	480		551
Sep-04	34	9	5	382		430
Oct-04	30	10	5	358		403
Nov-04	30	9	5	395		439
Dec-04	33	11	5	442		491
Jan-05	29	11	4	404		448
Feb-05	26	9	4	390		429
Mar-05	27	9	4	409		450
Apr-05	33	4	3	396		436
May-05	27	8	2	364		401
Jun-05	31	9	3	361		404
Jul-05	31	8	1	279		319
Aug-05	12	6	2	275		295
Sep-05	13	8	2	327		350
Oct-05	16	6	3	297		322
Nov-05	13	7	4	291		315
Dec-05	12	8	4	325		349
Jan-06	115	7	3	308		433
Feb-06	144	7	3	290		444
Mar-06	148	8	3	331		490
Apr-06	125	7	3	291		426
May-06	137	9	3	402		551
Jun-06	119	5	2	329		456
Jul-06	107	8	3	310		427
Aug-06	104	8	2	307		421
Sep-06	97	9	3	300		409
Oct-06	93	9	3	327		432
Nov-06	80	7	2	268		357
Dec-06	68	6	2	238		314
Jan-07	91	8	2	305		406
Feb-07	84	8	2	284		378
Mar-07	91	8	3	306		408
Apr-07	84	8	2	280		374
May-07	82	8	2	288		380
Jun-07	81	8	2	279		370
Jul-07	66	8	2	256		332
Aug-07	73	8	2	270		353
Sep-07	77	8	2	247		334
Oct-07	73	8	2	244		327
Nov-07	68	8	2	263		341
Dec-07	69	8	2	260		339
Jan-08	65	7	2	237		311
Feb-08	53	6	2	203		264
Mar-08	56	7	2	220		285
Apr-08	54	7	2	200		263
May-08	55	7	2	206		270
Jun-08	52	6	2	195		256
Jul-08	39	1	2	139		181

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Aug-08	50	7	2	198		256
Sep-08	43	5	2	177		227
Oct-08	45	5	2	187		239
Nov-08	45	7	2	197		251
Dec-08	45	5	2	187		239
Jan-09	39	8	2	124		173
Feb-09	34	8	2	122		164
Mar-09	35	8	2	122		166
Apr-09	32	6	1	119		158
May-09	45	7	2	201		254
Jun-09	39	5	1	157		202
Jul-09	38	5	1	152		196
Aug-09	39	7	2	202		250
Sep-09	36	6	2	223		267
Oct-09	36	8	2	206		251
Nov-09	32	7	1	167		208
Dec-09	32	8	1	171		212
Jan-10	34	8	1	175		219
Feb-10	30	7	1	161		198
Mar-10	33	7	1	173		214
Apr-10	33	7	1	175		216
May-10	33	7	1	176		217
Jun-10	29	6	1	130		165
Jul-10	20	7	1	171		200
Aug-10	23	7	1	188		220
Sep-10	21	6	1	148		177
Oct-10	24	7	2	185		218
Nov-10	18	6	2	151		176
Dec-10	26	6	2	164		198
Jan-11	25	6	2	163		195
Feb-11	25	7	2	165		198
Mar-11	27	8	2	174		209
Apr-11	22	6	1	143		171
May-11	20	5	1	138		164
Jun-11	17	5	1	104		127
Jul-11	15	4	1	92		112
Aug-11	14	2	1	80		97
Sep-11	16	6	1	98		121
Oct-11	17	6	1	113		137
Nov-11	33	6	1	105		145
Dec-11	45	6	1	98		150
Jan-12	46	6	1	103		156
Feb-12	40	5	1	89		135
Mar-12	43	5	1	94	0.017	142
Apr-12	47	6	1	105	0.000	159
May-12	47	6	1	100	0.000	154
Jun-12	42	6	0.3	99	0.029	148
Jul-12	30	6	0.1	102	0.000	138

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Aug-12	29	6	0.0	75	0.000	109
Sep-12	32	5	0.1	62	0.029	100
Oct-12	27	5	0.0	57	0.000	88
Nov-12	33	4	0.0	62	0.000	99
Dec-12	31	3	0.0	52	0.020	86
Jan-13	46	3	0.0	54	0.000	103
Feb-13	46	3	0.0	47	0.000	95
Mar-13	53	3	0.0	53	0.029	109
Apr-13	46	5	0.1	61	0.000	113
May-13	57	8	1.0	60	0.000	126
Jun-13	43	7	0.7	52	0.029	102
Jul-13	57	9	0.9	61	0.000	128
Aug-13	48	7	0.8	63	0.000	120
Sep-13	46	7	0.6	60	0.023	113
Oct-13	46	7	0.8	61	0.000	115
Nov-13	52	7	0.7	57	0.000	117
Dec-13	57	8	1.0	72	0.026	138
Jan-14	47	8	0.7	66	0.000	122
Feb-14	37	7	0.4	48	0.000	92
Mar-14	42	6	0.5	58	0.025	107
Apr-14	44	6	0.4	58	0.000	108
May-14	46	6	0.4	61	0.000	113
Jun-14	38	5	0.3	34	0.019	77
Jul-14	41	4	0.3	32	0.000	78
Aug-14	42	4	0.4	33	0.000	79
Sep-14	39	3	0.3	33	0.020	76
Oct-14	42	3	0.3	33	0.000	79
Nov-14	46	3	0.3	33	0.000	82
Dec-14	50	3	0.3	37	0.000	90
Jan-15	45	2	0.3	32	0.016	80
Feb-15	41	2	0.3	28	0.000	72
Mar-15	46	2	0.5	29	0.027	77
Apr-15	49	2	0.4	29	0.000	80
May-15	47	3	0.3	29	0.000	79
Jun-15	42	5	0.3	33	0.019	81
Jul-15	38	6	0.4	30	0.000	74
Aug-15	44	7	0.7	34	0.000	86
Sep-15	42	7	1.2	33	0.013	82
Oct-15	46	6	1.0	34	0.000	88
Nov-15	46	6	1.3	35	0.000	88
Dec-15	44	5	1.1	35	0.018	85
Jan-16	46	4	1.1	33	0.000	84
Feb-16	43	4	0.8	27	0.000	74
Mar-16	41	6	0.6	33	0.016	80
Apr-16	41	7	0.1	33	0.000	82
May-16	45	7	0.0	36	0.000	87
Jun-16	44	7	0.1	34	0.018	85
Jul-16	44	7	0.4	36	0.000	88

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Aug-16	42	7	0.1	34	0.000	83
Sep-16	38	5	0.9	32	0.021	77
Oct-16	40	5	0.9	31	0.000	77
Nov-16	41	6	0.1	33	0.000	79
Dec-16	43	6	0.2	33	0.017	82
Jan-17	44	6	0.8	36	0.000	87
Feb-17	36	5	0.6	29	0.000	71
Mar-17	39	5	0.6	33	0.017	78
Apr-17	34	5	0.3	31	0.000	70
May-17	32	5	0.5	27	0.000	64
Jun-17	31	4	0.3	26	0.018	61
Jul-17	32	5	0.1	36	0.000	73
Aug-17	29	6	0.0	37	0.000	71
Sep-17	31	5	0.0	27	0.033	63
Oct-17	36	4	0.2	28	0.000	67
Nov-17	34	5	0.7	28	0.000	68
Dec-17	32	5	0.8	28	0.020	65
Total to date	8430	1354	546	60985	0.519	71315

MASS REDUCTION DETAIL BY AQUIFIER

October 1 - October 31, 2017

	Extraction Well	Month To Date Gallons Extracted	Month To Date Average Daily Flow Rate GPM	Month To Date Average Daily Pounds Removed	Month To Date Pounds Removed	Month To Date Average Concentration ppb
C3						
	TW-1	622	0	0.00	0.00	80
	TW-2 (Dolph)	894,044	20	0.02	0.68	91
	TW-10	85,704	2	0.01	0.24	334
	TW-14	301,249	7	0.00	0.07	32
	TW-20	867,842	19	0.20	6.3	870
	Sub-Totals	2,149,461	48	0.2	7	
Marshy						
	PW-1	32,850	1	0.006	0.2	690
	Sub-Totals	32,850	1	0.01	0.2	
E						
	TW-17	580,696	13	0.08	2.4	400
	TW-18	6,348,457	142	0.45	13.8	261
	TW-19	1,352,697	30	0.3	8.0	711
	TW-23	2,968,889	67	0.4	11.4	461
	Sub-Totals	11,250,739	252	1	36	
Southwest						
	Active Wells	607,456	14	0.1	3.6	702
	Sub-Totals	607,456	14	0.1	4	
D2						
	LB-4	4,314,324	97	0.5	16.5	458
	TW-9	899	0	0.0	0.0	680
	TW-21	2,645,644	59	0.1	4.1	190
	Sub-Totals	6,960,867	156	0.7	21	
Overall Totals		21,001,373	470	2.2	67.3	

*SW Active = TW-8, TW-22

MASS REDUCTION DETAIL BY AQUIFIER

November 1 - November 30, 2017

	Extraction Well	Month To Date Gallons Extracted	Month To Date Average Daily Flow Rate GPM	Month To Date Average Daily Pounds Removed	Month To Date Pounds Removed	Month To Date Average Concentration ppb
C3						
	TW-2 (Dolph)	811,436	19	0.0	0.7	98
	TW-20	1,278,951	30	0.3	8.8	820
	Sub-Totals	2,090,387	48	0	9	
Marshy						
	PW-1	101,288	2	0.0	0.7	807
	Sub-Totals	101,288	2	0	1	
E						
	TW-18	6,742,209	156	0.5	14.6	260
	TW-19	1,305,276	30	0.3	7.6	702
	TW-23	2,931,352	68	0.4	12.1	493
	Sub-Totals	10,978,837	254	1	34	
Southwest						
	Active Wells	882,480	20	0.2	5.0	685
	Sub-Totals	882,480	20	0	5	
D2						
	LB-4	4,256,070	99	0.5	14.9	418
	TW-21	2,556,401	59	0.1	3.9	190
	Sub-Totals	6,812,471	158	1	19	
Overall Totals		20,865,463	483	2.3	68.3	

*SW Active = TW-8, TW-22

MASS REDUCTION DETAIL BY AQUIFIER

December 1 - December 31, 2017

	Extraction Well	Month To Date Gallons Extracted	Month To Date Average Daily Flow Rate GPM	Month To Date Average Daily Pounds Removed	Month To Date Pounds Removed	Month To Date Average Concentration ppb
C3						
	TW-2 (Dolph)	537,240	12	0.0	0.5	107
	TW-14	349	0	0.0	0.0	27
	TW-20	1,162,251	26	0.3	8.1	830
	<i>Sub-Totals</i>	1,699,840	38	0	9	
Marshy						
	PW-1	107,096	2	0.0	0.8	864
	<i>Sub-Totals</i>	107,096	2	0	1	
E						
	TW-17	34,213	1	0.0	0.1	500
	TW-18	6,242,225	140	0.5	14.4	274
	TW-19	1,183,521	27	0.2	7.0	705
	TW-23	2,633,242	59	0.3	10.3	473
	<i>Sub-Totals</i>	10,093,201	226	1	32	
Southwest						
	Active Wells	831,695	19	0.2	4.8	689
	<i>Sub-Totals</i>	831,695	19	0	5	
D0						
	Ann Arbor Cleaning	28,000			0.0196	84
	<i>Sub-Totals</i>	28,000			0.0196	
D2						
	LB-4	3,873,220	86.8	0.5	15.5	471
	TW-9	369	0	0.0	0.0	790
	TW-21	2,395,741	54	0.1	3.8	197
	<i>Sub-Totals</i>	6,269,330	140	1	19	
Overall Totals		19,001,162	426	2.1	65.3	

*SW Active = TW-8, TW-22