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November 5, 2012

NOV -7 2012

DEQ • RD JACKSON DISTRICT OFFICE

Ms. Sybil Kolon
Michigan Department of Environmental Quality
Environmental Response Division
Jackson District Office Building
301 E. Louis Glick Highway
Jackson, Michigan 49210

Re: Qu

Quarterly Progress Report

3rd Quarter, 2012 July 1, 2012 to September 30, 2012

Dear Ms. Kolon:

Please find enclosed the Quarterly Progress Report for the period of July 1, 2012 to September 30, 2012.

Should you have any questions regarding this document, please contact me at 734-913-6130.

Sincerely,

Farsad Fotouhi

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Vice President

Corporate Environmental Engineering

cc:

Ms. Celeste R. Gill, MDAG Michael Caldwell, Esq.



3rd Quarter, 2012

(July, August, September)

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Summary of Activity

CEB = Central Environmental Building

C3 = C3 aquifer

D2 = D2 aquifer

E = E aguifer

SW = Southwest Property Area

Maple = Maple Road

Treatment Activities

07/01/12 - 07/31/12 - PW-1 (Marshy) was shut down periodically due to low water levels in the Marshy area.

07/02/12-07/03/12 - TW-18 (E) was shut down for maintenance.

07/05/12-07/06/12 - TW-5 (D2) and TW-11 (E) were shut down due to a DTE power failure.

07/05/12-07/07/12 - Evergreen (D2) extraction was shut down due to a DTE power failure and System-2A was shut down to adjust the Pond level.

07/06/12-07/09/12 - TW-18 (E) was shut down for maintenance.

07/10/12 - LB-3 (D2) was shut down due to a DTE power brown-out.

07/19/12-07/31/12 - TW-19 (E) was shut down for the relocation of the Mobile Treatment Unit.

07/22/12 - TW-5 & TW-9 (D2), TW-10 (C3), and TW-11 (E) were shut down to adjust the Pond level and System-1A was shut down for maintenance.

07/25/12 - Evergreen (D2) extraction was shut down for maintenance.

08/01/12 - 08/31/12 - PW-1 (Marshy) was shut down due to low water levels.

08/01/12 - 08/07/12 - TW-19 (E) was shut down for the relocation of the mobile treatment unit.

08/02/12 - 08/06/12 - System 1A was shut down for maintenance.

08/03/12 - 08/06/12 - TW-5 & TW-9 (D2), TW-10 (C3), and TW-11 (E) were shut down to adjust the Pond level.

08/10/12 - Evergreen (D2) extraction was down due to a DTE power outage in the area.

08/11/12 - Treatment was shut down briefly due to a DTE power outage.

08/14/12 - Treatment was shut down briefly for maintenance.

08/14/12 - 08/31/12 - TW-10 (C3) and TW-11 (E) were shut down to reduce the total extraction

flow.

08/25/12 - TW-2 (C3) and System 2A were down for maintenance.

08/30/12 - TW-19 (E) was shut down for maintenance.

09/07/12 - Treatment was shut down briefly for maintenance.

09/10/12 - TW-20 (C3) was shut down briefly for maintenance.

09/01/12 - 09/30/12 - PW-1 (Marshy) was shut down due to low water levels.

Field Activities

Additional wells were plugged in the Expanded PZ: 584 Allison, 646 Barber (2)

07/20/12	MW-135 was installed in the Expanded PZ.

07/27/12 Mobile treatment unit was relocated from Dexter Road to the main Pall facility

08/13/12 Total purge rates were reduced to 500 gpm.

Submittals/Responses

07/16/12	PLS submitted Discharge Monitoring Report (DMR) electronically to DEQ
07/17/12	PLS submitted Monthly Monitoring Report (NPDES) to DEQ PLS submitted 2nd Quarter 2012 Report to DEQ
08/02/12	PLS submitted Evaluation of a Reduction in the Batch Purge Frequency-Little Lake Area to DEQ
08/15/12	PLS submitted Discharge Monitoring Report (DMR) electronically to DEQ
08/15/12	PLS submitted Monthly Monitoring Report (NPDES) to DEQ
09/20/12	PLS submitted Discharge Monitoring Report (DMR) electronically to DEQ

Anticipated Major Activities for the Next Quarter

• Upgrade lab analysis equipment

Quarterly Performance Analysis

For the months of July, August, September 2012, over 347 pounds of 1,4-dioxane were removed and 82,741,037 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 88,235 pounds and the total volume of water discharged since May 1997 is over 6.6 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 DETAIL BY AQUIFIER

July 1 - July 31, 2012

		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	Mor To D Avers Concen
<u>C3</u>							
		TW-1		0	0.0	0.0	11-
1		TW-2 (Dolph)	1,108,518	25	0.0	0.7	77
1		TW-3	-	0	0.0	0.0	34
		TW-6 TW-10	0 200 404	0 74	0.0 0.5	0.0 16.9	45 61:
		TW-14	3,306,184	0	0.0	0.0	33
ļ		TW-20	2,156,341	48	0.6	17.5	972
ļ		MW-22	2,100,041	0.0	0.0	0.0	181
1	Sub-Totals	11133	6,571,043	147	1	35	101
					<u> </u>		
<u>Marshy</u>						~ 4	440
	a.t. m · t	PW-1	8,200	0	0.0	0.1	113
	Sub-Totals		8,200	U	V	U	.
<u>E</u>							
		TW-11	1,414,922	32	0.1	2.4	20
		TW-12	-	0	0.0	0.0	25
		TW-17		0	0.0	0.0	390
		TW-18	4,812,135	108	0.4	12.6	314
		TW-19	2,363,566	53	0.5	15.4	779
		MW-64	8,590,623	0 192	0.0	0.0 30	51
			0,090,023	192	*		
Southwe	<u>it</u>						
		Active Wells	1,417,588	32	0.2	5.8	492
		MW-10d	-	0.0	0.0	0.0	498
		MW-75	-	0	0.0 0.0	0.0 0.0	25 2
	Sub-Totals	MW-45d	1,417,588	0.0 32	0.0	6	
<u>D0</u>		Ann Arbor					
		Cleaning	-			0.000	108
	Sub-Totals	***	-			0.000	
D2			•				
		LB-1	2,462,958	55	0.4	12.4	604
		LB-3	1,625,657	36	0.2	6.9	507
		HW-S	-	0	0.0	0.0	508
		TW-5	3,521,403	79	0.7	22.1	753
		TW-9	2,630,738	59	0.6	18.2	829
		TW-21	5,603,332	126	0.2	7.1	156
	Sub-Totals	MW-11D	15,844,088	0 355	2	0.0 67	112
	ono-rouns		10,044,000	555		V/	
	<u></u>						

^{*}SW Active = TW-8, TW-22

MASS REDUCTION DETAIL BY AQUIFIER

August 1 - August 31, 2012

		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	Mor To D Aver Concen
<u>C3</u>							
		TW-1	_	0	0.0	0.0	11
]		TW-2 (Dolph)	724,188	16	0.0	0.4	71
1		TW-3	-	0	0.0	0.0	34
		TW-6	4 450 005	0	0.0	0.0	45
ł		TW-10	1,156,365	26	0.2	5.4	54
1		TW-14	2,560,413	0 57	0.0 0.6	0.0 18.3	- 33 85
		TW-20 MW-22	2,000,413	0.0	0.0	0.0	181
	Sub-Totals	MVV-22	4,440,966	99	<u>0.0</u>	24	101
	DIID-101113		4,440,000		•		
Marshy				^			
1	a t m . t	PW-1	2,177 2,177	0	0.0	0.0	89
	Sub-Totals	=	2,177	0	0	0	
E		-					
		TW-11	535,097	12	0.0	0.9	186
		TW-12	-	0	0.0	0.0	25
		TW-17		0	0.0	0.0	390
		TW-18	5,993,434	134	0.5	16.3	325
		TW-19	1,743,668	39	0.4	11.6	795
İ		MW-64	8,272,199	0 185	0.0	0.0 29	50
			0,212,188	100	1	29	
Southwe	st						
		Active Wells	1,408,199	32	0.2	5.6	474
		MW-10d	-	0.0	0.0	0.0	351
		MW-75	•	0	0.0	0.0	25
	Sub-Totals	MW-45d	1,408,199	0.0 32	0.0	0.0 6	2
	Dilo Young	=	1,400,100	02			
<u>D0</u>		Ann Arbor					
		Cleaning	-			0.000	64
	Sub-Totals		-			0.000	
<u>D2</u>							
		LB-1	2,658,303	60	0.4	12.5	561
		LB-3	1,781,496	40	0.2	6.9	463
		HW-S	-	0	0.0	0.0	508
		TW-5	2,664,245	60	0.5	16.7	750
		TW-9	1,546,687	35	0.3	10.0	776
		TW-21	3,621,074	81	0.2	4.7	160
	Cat Tar-t-	MW-11D	- 10 074 905	0	0.0	0.0	112
:	Sub-Totals	# · · · · · · · · · · · · · · · · · · ·	12,271,805	275	2	51	

^{*}SW Active = TW-8, TW-22

MASS REDUCTION DETAIL BY AQUIFIER

September 1 - September 30, 2012

		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	Mon To D Avera Concent ppl
<u>C3</u>							
		TW-1	-	0	0.0	0.0	114
		TW-2 (Dolph)	588,928	14	0.0	0.3	59
ŀ		TW-3	-	0	0.0	0.0	34
		TW-6	-	0	0.0	0.0	45
Į.		TW-10	-	0	0.0	0.0	519
		TW-14	-	0	0.0	0.0	33
ł		TW-20	2,234,800	52	0.6	17.6	945
ĺ		MW-22	-	0.0	0.0	0.0	181
	Sub-Totals		2,823,728	65	1	18	
Marshy	·						
İ		PW-1	5,272	0	0.0	0.1	1130
	Sub-Totals		5,272	0	0	0	
E		_					
		TW-11	-	0	0.0	0.0	180
		TW-12	-	0	0.0	0.0	25
		TW-17	-	0	0.0	0.0	390
		TW-18	6,609,881	153	0.6	17.4	316
		TW-19	2,161,752	50	0.5	14.7	814
		MW-64	-	0	0.0	0.0	50
			8,771,633	203	1	32	
Southwe	st	_					
	_	Active Wells	1,343,194	31	0.2	5.4	480
		MW-10d	•	0.0	0.0	0.0	346
		MW-75	-	0	0.0	0.0	25
		MW-45d	-	0.0	0.0	0.0	2
	Sub-Totals		1,343,194	31	0	5	
D0		-	• •				
	Sub-Totals	A2 Cleaning	42,000 42,000			0.029	84
	Suo-rouns	=	44,000	****		V.023	
<u>D2</u>		104	0.570.404	60	0.4	40.4	ro.
		LB-1	2,578,421	60	0.4	12.1	564
		LB-3	1,729,380	40	0.2	6.9	478
		HW-S	0.004.050	0	0.0	0.0	508 785
		TW-5	2,224,050	51	0.5	14.6	
		TW-9	1,077,634	25 56	0.2	7.2	795
		TW-21	2,400,516	56	0.1	3.4	174
	Sub-Totals	MW-11D	10,010,001	0 232	0.0 1	0.0 44	112
		-					
Overali (_	22,953,828	531	3.3	00.6	******

^{*}SW Active = TW-8, TW-22

			SS REDUCTION SU			
Α	В	С	D	E	F	G
		Mass Removed				Total Mass
	Mass Removed	from		Mass Removed		Removed from
	from Unit E	Southwest	Mass Removed from	1	Mass Removed	Units E, D2, C3,
1.4 41-				i e		D0, Southwest and Marshy
Month	Only	Only	Marshy Only	and D2 Only	from Unit DO	
Aug-00	 	0	8	366		374
Sep-00		0	9	332		341
Oct-00 Nov-00	0	5 3	9 12	583 1160		597 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 34	13	5 5	725 683		779 737
Jun-03 Jul-03	29	15 15	5	678		727
Aug-03	31		6	676		728
Sep-03	27	15 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
341 UT					<u></u>	300

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			SS REDUCTION SU			
Α	В	С	D	E	F	G
	Mass Removed	Mass Removed from		Mass Removed		Total Mass Removed from Units E, D2, C3,
	from Unit E	Southwest	Mass Removed from	from Units C3	Mass Removed	D0, Southwest and Marshy
Month	Only	Only	Marshy Only	and D2 Only	from Unit DO	
Aug-04	54	12	5	480 382		551 430
Sep-04 Oct-04	34	9	5 5	358		403
Nov-04	30	9	5	395	V. 1	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
Маг-06	148	8	3	331		490
Apr-06	125	7	3 3	291		426
May-06 Jun-06	137 119	9 5	2	402 329		551 456
Jul-06	107	8	3	310		430
Aug-06	104	8	2	307		421
Sep-06	97	9	3	300		409
Oct-06	93	9	3	327		432
Nov-06	80		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 2	260 237		339 311
Jan-08 Feb-08	65 53	7	2	203		264
Mar-08	56	6 7	2	220		285
Apr-08	54	7	2	200		263
May-08	55	7	2	206	<u> </u>	270
Jun-08	52	6	2	195		256
Jul-08	39	1	2	139		181

			SS REDUCTION SU S Removed Per Mo			
Α	В	C	D	E	F	G
		Mass Removed				Total Mass
	Mass Removed	from		Mass Removed		Removed from
	from Unit E	Southwest	Mass Removed from	from Units C3	Mass Removed	Units E, D2, C3, D0, Southwest and
Month	Only	Only	Marshy Only	and D2 Only	from Unit DO	Marshy
Aug-08	50	7	2	198	110.110.1100	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 32	8	2	206		251
Nov-09	32	7 8	1 1	167 171		208 212
Dec-09 Jan-10	34	8	1	175		212
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 17	5 5	1	138 104		164 127
Jun-11 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	1	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

	MASS REDUCTION SUMMARY Mass Removed Per Month (lb)									
Α	В	С	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 DO	Total Mass Removed from Units E, D2, C3, D0, Southwest and Marshy				
Aug-12	29	6	0.0	75	0.000	109				
Sep-12	32	5	0.1	62	0.029	100				
Total to date	5785	1031	516	58445	0	65777				

Maps