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734.665.0651 phone

January 14, 2013

Ms. Sybil Kolon
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, 2012

October 1, 2012 to December 31, 2012

Dear Ms. Kolon:

Please find enclosed the Quarterly Progress Report for the period of October 1, 2012 to December 31, 2012.

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

Sincerely,

Javan Lotouhi

Farsad Fotouhi Vice President Corporate Environmental Engineering

cc: Ms. Celeste R. Gill, MDAG Michael Caldwell, Esq. RECEIVED

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DEQ • RD JACKSON DISTRICT OFFICE



4th Quarter, 2012

(October, November, December)

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Summary of activity during this quarter

Submittals/Responses

Anticipated activities for the next quarter

Quarterly Performance Analysis

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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

10/01/12-10/31/12 - Marshy extraction was down most of the month due to low water levels.

10/02/12 - System 2A was shut down briefly for maintenance.

10/03/12-10/05/12 - TW-19 (E) was shut down for maintenance.

10/17/12 - System 1A was shut down briefly for maintenance.

10/18/12-10/19/12 - Extraction & Treatment were shut down due to DTE power failures.

10/20/12-10/23/12 - TW-19 (E) was shut down as result of damage from the DTE power failure.

10/29/12 - System 2A was shut down briefly for maintenance.

10/29/12-10/30/12 - Evergreen extraction (D2) and TW-19 (E) was shut down due to multiple DTE power failures (Hurricane Sandy).

11/01/12 – 11/30/12 - Marshy extraction was down most of the month due to low water levels.

11/05/12 - HW-S (D2), TW-1, TW-10, and TW-14 (C3), TW-1, TW-10, and TW-14 (E) were turned on briefly for sampling.

11/29/12 - Evergreen extraction (D2) was shut down for maintenance.

11/29/12 - TW-19 (E) was shut down briefly for maintenance.

12/01/12-12/31/12 - Marshy extraction was all month due to low water levels.

12/06/12 – System-2A was shut down for maintenance.

12/09/12 - TW-2, TW-20 (C3), TW-18, TW-19 (E) and SW extraction and treatment were shut down due to a DTE power outage in the area

12/10/12 - TW-2, TW-20 (C3), LB-1, LB-2, TW-5, TW-9, TW-21 (D2), TW-18, TW-19 (E) and SW extraction and treatment were shut down due to a DTE power outage in the area.

12/11/12 - TW-2, TW-20 (C3), and SW extraction and treatment were shut down due to a DTE power outage in the area.

12/19/12 - System-2A was shut down for maintenance.

12/24/12-12/26/12 – TW-21 (D2), TW-2 (C3) and TW-18 & TW-19 (E) were shut down for maintenance. TW-10 (C3) was started and System-2A was shut down to maintain the Pond level.

12/26/12 - System-1A was shut down briefly for maintenance.

Field Activities

Additional wells were plugged in the Expanded PZ: 2720 Valley & 420 Parkwood

10/5/12 MW-1 Replacement installed

Submittals/Responses

10/05/12	PLS re-submitted August Discharge Monitoring Report (DMR) electronically to DEQ PLS submitted Monthly Monitoring Report (NPDES) to DEQ (August)
10/22/12	PLS submitted partial Discharge Monitoring Report (DMR) electronically to DEQ (September)
11/05/12	PLS submitted completed Discharge Monitoring Report (DMR) electronically to DEQ (September) PLS submitted Monthly Monitoring Report (NPDES) to DEQ PLS submitted 3rd Quarter 2012 Report to DEQ
11/20/12	PLS submitted Discharge Monitoring Report (DMR) electronically to DEQ
11/21/12	PLS submitted Monthly Monitoring Report (NPDES) to DEQ
12/14/12	PLS submitted Discharge Monitoring Report (DMR) electronically to DEQ
12/17/12	PLS submitted Monthly Monitoring Report (NPDES) to DEQ

Anticipated Major Activities for the Next Quarter

- Increase sampling from quarterly to monthly for MW-103s, MW-76s, MW-112i, and MW-84s
- Increase purge rate at TW-19 to 100 gpm (currently 50 gpm)

Quarterly Performance Analysis

For the months of October, August, December 2012, over 273 pounds of 1,4-dioxane were removed and 69,601,106 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 88,500 pounds and the total volume of water discharged since May 1997 is over 6.7 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

October 1 - October 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 Avera Concen
<u>C3</u>							
		TW-1	•	0	0.0	0.0	114
ļ.		TW-2 (Dolph)	585,079	13	0.0	0.4	74
		TW-3	-	0	0.0	0.0	34
ĺ		TW-6	-	0	0.0	0.0	45
		TW-10	-	0	0.0	0.0	519
]		TW-14		0	0.0	0.0	33
]		TW-20	2,191,880	49	0.5	16.6	906
i	~ 1 1	MW-22		0.0	0.0	0.0	185
	Sub-Totals		2,776,959	62	1	17	
Marshy							
	•	PW-1	222	0	0.0	0.0	130
	Sub-Totals		222	0	0	0	
E							
Ē		TW-11	_	0	0.0	0.0	180
		TW-12	_	ŏ	0.0	0.0	25
		TW-17	_	ő	0.0	0.0	390
		TW-18	7.024.556	157	0.5	15.7	267
		TW-19	1,703,118	38	0.4	11.1	782
		MW-64	1,700,710	0	0.0	0.0	50
			8,727,674	196	1	27	
					1 1111111111111111111111111111111111111		
Southwe	<u>st</u>	A attion that all a	4 000 045	00	0.4	4.5	400
		Active Wells	1,289,645	29	0.1	4.5	420
		MW-10d	-	0.0	0.0	0.0	464
		MW-75	-	0	0.0	0.0	132
	Sub-Totals	MW-45d	1,289,645	0.0 29	0.0	0.0 5	256
			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		 		
<u>D0</u>					***		
	Sub-Totals	A2 Cleaning	-			0.000	62
						0.000	
<u>D2</u>				_		711	
		LB-1	2,570,665	58	0.3	10.2	475
		LB-3	1,723,490	39	0.2	5.9	413
		HW-S	•	0	0.0	0.0	508
		TW-5	2,272,802	51	0.5	14.9	786
		TW-9	1,089,636	24	0.2	5.6	613
		TW-21	2,735,379	61	0.1	3.5	157
	0.1.00 . 1	MW-11D	40.004.070	0	0.0	0.0	123
	Sub-Totals		10,391,972	233	1	40	
Overall T	Cotale	-	23,186,472	519	2,8	90 2	

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

MASS REDUCTION DETAIL BY AQUIFIER

November 1 - November 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	Mont To Da Avera Concente ppb
<u>C3</u>							
1		TW-1	212	0	0.0	0.0	104
1		TW-2 (Dolph)	554,872	13	0.0	0.1	28
		TW-3	-	0	0.0	0.0	11
		TW-6	•	0	0.0	0.0	44
		TW-10	1,585	0	0.0	0.0	328
		TW-14	2,603	0	0.0	0.0	21
		TW-20	2,154,110	50	0.6	16.5	918
		MW-22		0.0	0.0	0.0	2000
	Sub-Totals		2,713,382	63	1	17	
Marshy	,						
1	•	PW-1	28	0	0.0	0.0	1248
	Sub-Totals		28	0	0	0	
<u>E</u>							
j=		TW-11	-	0	0.0	0.0	720
1		TW-12	-	0	0.0	0.0	22
		TW-17	1,848	0	0.0	0.0	416
		TW-18	6,874,682	159	0.6	17.0	296
		TW-19	2,167,167	50	0.5	15.7	867
1		MW-64	-	0	0.0	0.0	54
İ			9,043,697	209	1	33	
Southwe	est						
	_	Active Wells	1,162,006	27	0.1	4.4	457
		MW-10d	•	0.0	0.0	0.0	752
l		MW-75	-	0	0.0	0.0	500
		MW-45d	-	0.0	0.0	0.0	985
	Sub-Totals		1,162,006	27	0	4	
<u>D0</u>							
}		Ann Arbor Cleaning				0.000	72
	Sub-Totals	Oleanity	-			0.000	12
D2							
<u>174</u>		LB-1	2,562,512	59	0.4	12.3	575
1		LB-3	1,726,378	40	0.2	6.5	454
		HW-S	1,187	0	0.0	0.0	614
		TW-5	2,288,056	53	0.6	16.7	877
		TW-9	1,079,863	25	0.2	6.4	715
		TW-21	2,583,881	60	0.1	3.5	168
		MW-11D	_	0	0.0	0.0	160
	Sub-Totals		10,241,877	237	2	46	
							

*SW Active = TW-8, TW-22

MASS REDUCTION DETAIL BY AQUIFIER

December 1 - December 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	Mon To D Avera Concent ppt
<u>C3</u>				_			
		TW-1	040.440	0	0.0	0.0	10:
		TW-2 (Dolph)	613,110	14	0.0	0.3	68
1		TW-3 TW-6	-	0 0	0.0	0.0	8
		TW-10	150,372	3	0.0 0.0	0.0 0.4	43 30
1		TW-14	100,312	0	0.0	0.4	19
1		TW-20	1,732,530	39	0.4	13.3	920
ŀ		MW-22	1,702,000	0.0	0.0	0.0	200
	Sub-Totals		2,496,012	56	0	14	
Marshy		PW-1	_	0	0.0	0.0	124
	Sub-Totals		_	Ō	0	0	
<u> </u>							
E		TW-11	•	0	0.0	0.0	800
Į		TW-12	-	0	0.0	0.0	21
		TW-17	-	0	0.0	0.0	420
		TW-18	6,655,783	149	0.5	16.4	294
		TW-19	2,036,408	46	0.5	14.4	845
		MW-64	-	0	0.0	0.0	54
			8,692,191	195	1	31	
Southwe	st						
	_	Active Wells	1,063,891	24	0.1	3.1	350
		MW-10d	-	0.0	0.0	0.0	752
		MW-75	•	0	0.0	0.0	500
		MW-45d	-	0.0	0.0	0.0	985
	Sub-Totals		1,063,891	24	0	3	
<u>D0</u>							
		Ann Arbor	40.000			0.000	E^
	Sub-Totals	Cleaning	42,000 42,000			0.020	56
	-		•			•	
<u>D2</u>		LB-1	2,598,706	58	0.3	9.1	419
		LB-3	1,755,780	39	0.2	6.8	461
		HW-S	-	ő	0.0	0.0	630
		TW-5	2,274,492	51	0.4	12.7	666
		TW-9	1,091,453	24	0.2	6.0	657
		TW-21	2,529,385	57	0.1	3.3	163
		MW-11D		0	0.0	0.0	160
	Sub-Totals		10,249,816	230	1	38	
	*						
	<u> Cotals</u>	-	22,501,910	504	2.8	0.5.7	******

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

	MASS REDUCTION SUMMARY Mass Removed Per Month (lb)									
A	В	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 DO	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 37	8	6	839		898				
Feb-03	44	6 8	<u>6</u> 7	767 763		816 822				
Mar-03 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				

	MASS REDUCTION SUMMARY Mass Removed Per Month (lb)									
Α	В	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 DO	Total Mass Removed from Units E, D2, C3, D0, Southwest and Marshy				
Aug-04	54	12	5	480	A region of the graph medical system is a few and the system of the	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 93	9	3	300		409 432				
Oct-06 Nov-06		7	2	327 268		432 357				
Dec-06	80 68	6	2	238		314				
Jan-07	91	8		305		406				
Feb-07	84	8	2 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				

	MASS REDUCTION SUMMARY Mass Removed Per Month (lb)									
Α	В	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 DO	Total Mass Removed from Units E, D2, C3, D0, Southwest and Marshy				
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 5	1	89 94	0.047	135				
Mar-12	43		1		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	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 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		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				
Total to date	5875	1043	516	58616	0	66050				