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RE: Well Identification Plan Response
Michigan Department of Environmental Quality ("DEQ")
Response to July 21, 2008 Correspondence

Dear Ms. Kolon:

This is in response to the DEQ's correspondence of July 21, 2008, regarding the Well Identification Report submitted by Pall Life Sciences ("PLS") dated November 28, 2006. Attached to this correspondence are a spreadsheet and surveys that provide information regarding the locations identified in Table 1 attached to DEQ's July 21st correspondence.

The DEQ's correspondence suggests, in very strong terms, that the substantial efforts expended by both PLS and the DEQ on this project have failed to accomplish the Court's mandate of preventing unacceptable exposures to the groundwater within the Prohibition Zone. Nothing could be further from the truth.

PLS and the DEQ have been working on this project for over three years. The Court's actual mandate was satisfied soon after the Court issued its December 17, 2004 Unit E Order. The Unit E Order instructed the parties to submit an order to establish the area within which consumption or use of groundwater would be prohibited (subsequently designated as the "Prohibition Zone"). The Court required PLS to provide municipal water to any "existing private drinking water wells within" the Prohibition Zone in order to eliminate unacceptable exposures to the groundwater. (Unit E Order, p. 11.) As required by the subsequently entered May 17, 2005 Order Prohibiting Groundwater Use (the "PZ Order"), PLS submitted its June 17,

2005 Work Plan for Identification, Abandonment, and Replacement of Certain Private Water Supply Wells (the “Well ID Plan”) (emphasis added). As reflected in the name of the Well ID Plan, the purpose of this effort was to carry out the Court’s instruction to identify and then connect to the municipal water supply any properties within the Prohibition Zone that might still be using private drinking water wells.

The parties agree that the few private drinking water wells within the Prohibition Zone still in use were identified and the properties connected to municipal water soon after the PZ Order was entered. Thus, PLS and the DEQ eliminated any unacceptable drinking water exposures within the Prohibition Zone years ago.

The DEQ, however, has subsequently attempted to broaden the Court’s original mandate and the scope of the DEQ-approved Well ID Plan. The DEQ has required PLS to identify any property that may at one time have had a well and then to definitively prove that any such historic well has been properly abandoned – *despite the undisputed fact that any such property has been serviced by municipal water for decades*. PLS disputes that such a search is required, not because it is less concerned about public health than the DEQ, not because the investigation is hard and costly, and not because such a search is not required by the Court’s orders. Rather, PLS disputes this requirement because there is no reasonably possible scenario under which the residents of such properties could be subject to any unacceptable exposures.¹

Despite PLS’ oft-stated objections to the broadened scope of its investigation, PLS has, without waiving these objections, worked over the last three years to address the DEQ’s concerns. In hopes of avoiding the need to involve the Court, PLS agreed not only to continue its search for out-of-service wells, but also to properly abandon the few such wells that were discovered. The enclosed spreadsheet summarizes the latest, and final, results of PLS’ investigation of the remaining properties with regard to which questions have been raised. PLS hopes its considerable efforts will be enough to satisfy the DEQ and to avoid Court involvement. PLS is, however, prepared to present the results of its investigation to the Court if necessary. Further explanation is of these findings provided below.

Background

At the DEQ’s request, the Well ID Plan was divided into two parts and the investigation phased. Part I provided for identification of existing private drinking water wells within the

¹ The DEQ’s justification for this requirement is that old private wells may have been retained and cross-connected with the municipal water or used to supply water for non-potable uses such as irrigation. Neither of these justifications supports the DEQ’s requests for this level of investigation. Cross-connections are and always have been illegal for reasons independent of the PZ Order. It is extremely unlikely that the City of Ann Arbor would have countenanced such connections when properties were connected to City water because they can negatively affect the municipal water system. Moreover, because such connections have always been illegal it is not clear how PLS could ever ferret out these connections – if any exist – short of inspecting the plumbing of each home in Ann Arbor. Although the potential use of old wells for irrigation is possible, PLS’ search has only revealed a few such wells. Even if such additional wells exist, they do not lead to unacceptable exposures for the very reason that they are not used to supply potable water. (The highest contaminant concentrations that might migrate through the Prohibition Zone are orders of magnitude below the level that might present a direct contact hazard.)

Prohibition Zone. This was divided into three tasks: Task 1, a door to door survey of two specific neighborhoods (Westover and South Wagoner Road); Task 2, research and preparation of a chronology regarding the availability of municipal water within the Prohibition Zone; and Task 3, research and preparation of a memorandum regarding ordinances regulating connection to municipal water. The purpose of Tasks 2 and 3 was to explain the evolution of the City of Ann Arbor water supply to the DEQ to show that, from a legal and practical perspective, entire neighborhoods within the Prohibition Zone could be identified as not likely to have contained drinking water wells. The Well ID Plan provided that if other vulnerable neighborhoods within the Prohibition Zone were identified, PLS would propose a supplement to the work plan to address such neighborhoods. Part II of the Well ID Plan provided for the plugging of identified water supply wells. Part II of the Well ID Plan also provided for three tasks to be accomplished with respect to properties within the Prohibition Zone that were identified as possessing private water supply wells and that did not have a connection to the municipal water supply.

DEQ made a preliminary response to the Well ID Plan by letter dated July 11, 2005, and followed with a compilation of comments and a conditional approval dated August 12, 2005. In those documents, DEQ insisted that certain procedures be followed regarding abandonment of identified wells and dictated a sequence for accomplishing the tasks in the Work Plan. Since then, there has been a detailed exchange of information and further comments as PLS has worked with DEQ to identify locations of possible wells within the Western and Eastern PZ.

Summary of Well Identification Procedures and Results

Local laws and ordinances required homes built in the City to connect to municipal water when it was available. Consequently, the parties have agreed that houses built inside the City with municipal water present at the time of construction would not have been serviced by a private well. This circumstance existed for almost all of the Eastern PZ. The Western PZ is somewhat more likely to contain out-of-service private wells because these properties were not necessarily within the City of Ann Arbor when the homes were built.

In order to document this development pattern and to identify any areas where the potential for private wells existed, PLS obtained and supplied to the DEQ subdivision maps. These maps show the date each of the subdivisions within the Prohibition Zone was platted and indicate roughly the earliest years houses were constructed. These maps confirm that nearly all of the developed parcels in the Eastern PZ were within subdivisions that had municipal water when the subdivisions were platted and the homes built. Thus, these parcels would not have been serviced by a residential well. In the Western PZ, there were a larger number of parcels that were developed before they were annexed to the City.

PLS, with the DEQ's assistance, has identified and listed on tables exchanged by the parties each parcel in the Prohibition Zone that was developed outside a subdivision or before being annexed to the City. For instance, some properties were located in Ann Arbor Township or Scio Township at the time they were developed. Homes built on Township parcels were not legally required to connect to municipal water when built. Thus, further investigation of these

parcels was undertaken to determine whether these parcels were likely to have been serviced by a private well before being connected to municipal water.

With respect to each such property, PLS has assembled all available information and presented it to the DEQ. These sources of information have included: 1) FOIA requests to the City of Ann Arbor, Ann Arbor Township, Scio Township, Washtenaw County, and the Washtenaw County Health Department; 2) visits to these local agencies and review of additional records; 3) consultation of online records and databases; 4) review of records at local libraries; and 5) extensive conversations/interviews of staff persons from the relevant local agencies. The full nature of PLS' investigation is documented in earlier submittals. With regard to the parcels listed on the DEQ's Table 1, PLS has attempted to identify dates of construction; annexation dates; when taps to municipal water were available for the location; and, where available, billing information. PLS has used the combined information (date of construction, date of annexation, date that tap was available, and sometimes even billing information) to draw a conclusion as to whether it is likely that the location was serviced by a private well at one time.

The attached spreadsheet summarizes the results of this investigation. In those locations where available information suggests there is a reasonable possibility that a well may have been installed some time in the past, PLS has sent surveys to the address, interviewed the resident, or both, and has compiled the information. When allowed, PLS physically inspected the property. This was done in accordance with the procedures approved by DEQ. With the exception of category "L" discussed below, where such surveys and interviews have not yielded any additional information, the investigation is considered closed. The properties and PLS' conclusions as to whether further action is needed are categorized as follows:

Category "1". The records PLS has reviewed indicate that properties in this category were provided municipal water within one year of the construction date. Where taps were available at or near the time the property was developed, PLS has concluded that the house was connected to that tap. It is extremely unlikely that the developer would go to the expense and effort to install a private well when municipal water was immediately available. PLS does not believe any further investigation of these properties is warranted because it is unlikely they were ever serviced by a private water well.

Category "2". These properties are ones where the available records confirm that municipal water has been provided to the property for more than 30 years, but are not sufficient to completely eliminate the possibility that a private well existed in the distant past. PLS does not believe any further action is warranted at such properties because it is unlikely that the agreed upon survey tools would yield any useful information. Residents are unlikely to have any useful information regarding wells that may have been present this long ago. It is equally unlikely that an inspection would be able to locate wells this old. Consequently, PLS does not intend to take further action regarding this category of properties.

Category "3". PLS has surveyed a large number of properties for which the available information indicated the property may have been serviced by a private well in the last 30

years. For properties in this category, PLS received reliable information from the resident confirming that he/she was not aware of any existing wells on the property. In many instances, PLS personnel were also allowed to inspect the property to confirm the absence of wells. Consistent with the procedures approved by the DEQ, no further action regarding these properties is required.

Category “4”. These properties were annexed within one year of the date the home on each property was built. As documented in previous submissions to the DEQ, properties annexed into the City were legally required to connect to municipal water. PLS has added a field with annexation dates for many of these addresses to verify that they would have been subject to this legal requirement within one year of the construction date. No further action regarding properties in this category is required because it is unlikely that they were ever serviced by a private well.

Category “5”. PLS’ additional research regarding this category of properties has confirmed that they were included within the City limits at the time the homes were built and that municipal water was available. Specifically, houses built within the City at or near the tap date are not considered to be probable locations for wells because they would have been subject to the same legal requirements discussed above. No further action is required with regard to this category of properties because it does not appear that they would have ever been serviced by a private well.

Category “A”. One well was located as a result of a survey response from the owner of 1521 Miller. PLS has abandoned the out-of-service well despite its position that the PZ Order does not require it to do so. The well abandonment records have been provided to the DEQ.

Category “L”. There are a small number of properties (<10) where wells were known to exist and where the parties are aware that the wells were kept open even after the properties were connected to municipal water. Several of the wells at these properties were initially sampled by PLS, but are no longer as part of its groundwater monitoring program. Because there are no records confirming that these wells have been abandoned, PLS surveyed each of these properties and inspected them when allowed to do so. PLS has confirmed the absence of wells at several of these properties through these procedures (such properties are included in category “3”). There are, however, several properties where surveys were not returned or were returned by a resident who had only lived in the house a short time. PLS will send another letter to the properties in this category because a well was known to exist in the recent past and the survey tool did not provide adequate information to confirm the absence of the well. The content of the letter is discussed below.

Additional Response to DEQ Letter

DEQ COMMENT: Since the DEQ’s conditional approval of the Work Plan, additional sources of information have come to light that can be used by PLS to increase the reliability of the PZ.

This information includes the City of Ann Arbor's (City) water utility database and Washtenaw County's Map Washtenaw geographical information system that now includes all City parcels, with links to detailed building information.

PLS appreciates the DEQ pointing out the availability of this information. This information was, however, available to, and reviewed by, PLS at the time of the initial reports and various supplements. Although the City of Ann Arbor database was not directly available to PLS because of then-pending litigation, PLS obtained the relevant information via FOIA requests. PLS utilized that information with respect to properties it believed may have had unresolved questions due to the age of construction. That litigation has now been settled, and PLS was recently able to obtain tap date information from this database by telephone from the City's utilities department. The County GIS system is now available on-line, but the "detailed building information" the DEQ references was previously (and is still) available on-line through the jurisdictional web sites with tax appraisal information. This data was also consulted by PLS in compiling the various tables and supplements sent to DEQ. Therefore, there is no need to revisit this aspect of the previously completed investigation.

DEQ Comment: Other conflicting information regarding the existence of water supply wells includes the responses PLS received from the City regarding its Freedom of Information Act (FOIA) requests. PLS initially interpreted the term "tap date" to mean the date the building was connected to municipal water. Subsequent follow-up with the City by the DEQ staff found that this is the date that a service lead with shut off valve was installed at the property line, not necessarily the date water was provided to a building. The DEQ provided this information to PLS in April 2007. PLS still questions the City's explanation and indicated it would do additional research. The DEQ will consider any new information PLS can provide on this matter.

The information provided to DEQ about connection dates is not accurate. The "water utilities database" is maintained at the City Field Office (734-994-1760). PLS called this office (Linda Rathburn) and obtained information about the addresses identified with an "e" code on Table 1 of the DEQ July 21st letter. That information is set forth in the attached spreadsheet. Ms. Rathburn explained that the meter set date (which is not available in that database) is the date recorded for the last time the meter was set or updated. In some homes, particularly older homes, these dates are much later than the initial date of service because meters are periodically replaced to provide telemetry or when water lines are upgraded. Only the latest dates for the meter installation are preserved. Meter set dates might be available from the customer service department. Since these dates are not consistently related to the date of initial service, they are not of any benefit.

As the attached spreadsheet shows, in most cases, the tap date is coincident with the date of construction of the home, and it is reasonable to infer that the home was never supplied with well water as that would have been a needless and significant expense, and also contrary to City ordinance. In a very few cases, the tap date from the electronic database is significantly newer than the purported construction date. However, Ms. Rathburn indicated that the tap dates were also sometimes updated when iron mains were replaced with copper. The database sometimes

(but not always) shows when the lines were updated and the tap date updated; however, the original tap date is not preserved in the electronic database. Ms. Rathburn agreed to consult hard records to determine if the original tap date was preserved for addresses as shown in the table. She phoned Mr. Wasserman back with requested information on certain locations identified in DEQ's table, and this information is also provided. It should be noted that the written records on the questioned parcels contain the original tap dates and show that service began significantly before some of the dates identified in the database. This is consistent with Ms. Rathburn's explanation, and PLS hopes this will finally close this issue.

Notice To Occupants Where Unused Wells Cannot be Located

The DEQ's July 21, 2008 correspondence states that the "DEQ will require PLS to provide notification to specific property owners within the Prohibition Zone where wells were known to exist, but cannot be found and plugged, or where the absence of wells cannot be verified." With the exception of the few homes in the "L" category discussed above, PLS does not agree to provide additional notice. The rationale for this is as follows:

1. Every address where it is reasonably possible that a well was in use in the last 30 years has been surveyed or contacted in person by PLS. The survey cover letter, which was approved by the DEQ, includes a description of the groundwater use restrictions, the well identification process and PLS' obligation to connect residents to municipal water, as well as a copy of the PZ Order. This information was also provided to the resident in situations where PLS conducted an in-person interview. Thus, the information the DEQ wants PLS to provide has already been provided. The notice DEQ is now demanding adds no further protection with respect to those addresses.
2. The Prohibition Zone and the PZ Order have already been publicized in the local newspaper, both in the legal notice section and in numerous front page articles. They are also published and available for public inspection at the City and on numerous websites, including the Map Washtenaw website, where the Prohibition Zone appears as a default layer on the opening page.
3. Providing an additional written notice to the current address adds no additional protection beyond that already provided as described above. An occupant who does not know of a well, or is not responsive to a survey, is not any more likely to be "protected" by receiving another letter.
4. It would be inappropriate for PLS to provide residents with legal advice regarding their obligations under Part 201. Although the statute speaks for itself, it is unlikely the Court will be inclined to burden homeowners with a disclosure obligation regarding a resource restriction that is duplicative of an existing restriction that is independently imposed by a series of local ordinances.

5. PLS is unaware of any legal authority that would authorize it (or the DEQ for that matter) to require homeowners to “provide information about the existence of wells to PLS or the DEQ.”

Final Report

While PLS appreciates DEQ’s desire to have everything wrapped up in one package, it was the DEQ’s request that this project be completed in phases. The process was also necessarily an iterative one that has been documented appropriately as each task has been completed. PLS will discuss with the DEQ the most appropriate method of compiling the previously submitted documentation so that it is in one location that can be conveniently referenced. PLS, however, disagrees with the DEQ’s suggestion that this compilation is some kind of “living document.” It was important to identify properties where unacceptable exposures might occur, and PLS has committed tremendous resources to make sure any such properties were thoroughly investigated to eliminate this possibility. Although the results of this process must be documented – as they have been – there is little need for either the DEQ or local units of government to revisit this effort in the future. Going forward, the protections established by the Court are self-enforcing and effective in preventing unacceptable exposures to the groundwater.

The DEQ repeats its demand that PLS provide it with a map of the Prohibition Zone on which each of the subdivisions, “with names,” is platted. The approved Well ID Plan does not list such a map as one of PLS’ required deliverables. Nevertheless, PLS previously provided maps for the individual subdivisions and a map of the Prohibition Zone with the locations of each subdivision indicated. PLS has been able to complete its review of potentially vulnerable areas without a high-tech version of the previously provided graphic. If the DEQ does not feel that the map provided is of sufficient quality or definition, then the information PLS has already provided will enable the DEQ to prepare the desired map. PLS has previously referred the DEQ staff to several County and City websites that may be useful in this regard.

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Conclusion

PLS remains committed to fulfilling the Court's mandate of insuring that there are no private water wells still in use within the Prohibition Zone and thus no unacceptable exposures. Indeed PLS has gone well beyond that mandate and thoroughly investigated any properties where there may have been a private well at anytime in the past, even though these properties were connected to municipal water decades ago. PLS is confident that the efforts of both PLS and the DEQ will insure that the institutional control established by the Court is protective of the public health.

Very truly yours,

ZAUSMER, KAUFMAN, AUGUST,
CALDWELL & TAYLER, P.C.

/s/

Michael L. Caldwell

MLC:hr

Cc: Celeste Gill, Esq.
Lynelle Marolf, DEQ
Mitchell Adelman, DEQ
Farsad Fotouhi, PLS
Alan Wasserman, Esq.

Address	Current Owner	PLS Comments (as of 9/15/06 or other, where indicated) [DEQ information]	DEQ Code	MDEQ Additional Comments	Annexed	Tap Date	First billed for City water	Action Code	Comments (final)
Arborview 1516	Ruth V. Hartman	not included [not in subdivision]	e	confirm in city when built (1967) or verify hook-up date	1968	nothing	1/3/1967	4	Annexed to the City and billed for water within one year of construction
Arborview 1522	Robert M. & Linda L. Johnson	survey response - owner of 28 years says hooked up when built in 1935; no knowledge of wells [not in subdivision]	e	built 1935, before hook-up required		7/2/1936		5	In city limits when built, tap available within one year of construction
Arborview 1600	Roger I. & Barbara R. Wykes	not included [not in subdivision]	e	confirm in city when built (1953) or verify hook-up date		6/16/1953		5	In city limits when built, tap available within one year of construction
Arborview 1606	Harvey Michaels & Gloria Helfand	not included [not in subdivision]	e	confirm in city when built (1981) or verify hook-up date		8/26/1981		5	In city limits when built, tap available within one year of construction
Arborview 1610	Steven & K. Rhodes	not included [not in subdivision]	e	confirm in city when built (1984) or verify hook-up date		8/26/1981		5	In city limits when built, tap available within one year of construction
Arborview 1614	Dennis & Ariane Pink	not included [not in subdivision]	e	confirm in city when built (1984) or verify hook-up date		8/26/1981		5	In city limits when built, tap available within one year of construction
Arborview 2015	Sanford Brumley Jr.	per 5/19/06 report, built 1956, tap date 7/14/55 [not in subdivision]	e	confirm in city when built or verify hook-up date		7/14/1955		5	In city limits when built, tap available within one year of construction
Arborview 2101	Herbert & Muriel Frederick	built 1953, tap date 3/6/52; long term owner says connected to city water when built	e	city FOIA - meter set Oct 1982		3/6/1952		5	In city limits when built, tap available within one year of construction
Arborview 2107	Pablo & W.S. Lavallo	not included [not in subdivision]	e	confirm in city when built (1992) or verify hook-up date		10/6/1992		5	In city limits when built, tap available within one year of construction
Dexter 1500	Lori Hale	not included [not in subdivision]	e	built 1901, before hook-up required	1964	10/15/1915	1/7/1978	2	Tap available 93 years ago; annexed to city in 1964, would have been required to hook up at that time
Dexter 1610	Richard Yarmain Trustee	not included; Assessor's Plat #12	e	built 1937, before hook-up required	1964	8/30/1961	not avail (error message in database for previous owner)	2	Would have been connected to city water when annexed in 1964.
Dexter 1614	Sarah L. Lampton	not included; Assessor's Plat #12	e	built 1931, before hook-up required	1964	8/30/1961	1/18/2005	2	Would have been connected to city water when annexed in 1964.
Dexter 1616	Jonathan A. Hoard & Laura J. Williams	in 11/28/06 report; built 1929, tap date 6/29/22, no survey planned [built before Assessor's Plat #12 was platted, city web site says built 1920]	e	city FOIA - meter set Jan 1989		6/29/1922		5	In city limits when built, tap available within one year of construction
Dexter 1706	Brian & Jennifer & Kevin Zimmer	in 11/28/06 report; built 1926 & tap date 7/24/26 [built before Assessor's Plat #12 was platted]	e	city FOIA - meter set Sept 1992		7/24/1926		5	In city limits when built, tap available within one year of construction
Dexter 2008	Christopher R. Weber	not included [not in subdivision]	e	built 1935, before hook-up required		11/18/1936		5	In city limits when built, tap available within one year of construction
Dexter 2010	Sonia Duffy	not included [not in subdivision]	e	confirm in city when built (1954) or verify hook-up date	prior to 1944		5/18/1999	5	In City when built in 1954, property annexed to City prior to 1944, would have been required to connect when built

Address	Current Owner	PLS Comments (as of 9/15/06 or other, where indicated) [DEQ information]	DEQ Code	MDEQ Additional Comments	Annexed	Tap Date	First billed for City water	Action Code	Comments (final)
Dexter 2020	Mary E. Mandeville	built 1946, tap date 4/8/47; no survey planned [not in subdivision; A2 twp island, on city water]	e	city FOIA - meter set Mar 1959		4/8/1947		5	In city limits when built, tap available within one year of construction
Dexter 2102	Edwin & V. Birkle	not included [not in subdivision]	e	built 1901 when part of township	1971	6/2/1970	1/17/1996	2	Based on hard record review, tap available 70 years ago; annexed to city in 1971, would have been required to hook up at that time at the latest
Dexter 2106	Bruce Janiszewski	built 1937, tap date 1926; no survey planned [not in subdivision; A2 twp island, on city water]	e	city FOIA - meter set Oct 1978		11/22/1939		1	From hard record review: property hooked up within one year of construction. Survey left at home 9/12/08
Dexter 2200	William & Christina Levleit	built 1950, tap date 1926; no survey planned [not in subdivision; A2 twp island, on city water]	e	city FOIA - meter set Nov 1990	n/a still twp	2/1/1928	1/11/1990	2,3	Surveyed - resident of 15+ yrs unaware of any wells
Dexter 2310	Raymond Knight Jr. Family	survey also included 2320 & 2324 Dexter, same owner, says built 1966; per PLS 10/19/06 e-mail, hooked up when built	e	confirm in city when built or verify hook-up date	2002	7/3/2001	8/20/2001	1,3	Already surveyed, owner confirms hooked up when built; no knowledge of wells.
Dexter 2324	Raymond Knight Jr. Family	restaurant; owner has no knowledge of wells	e	confirm in city when built or verify hook-up date; built 1979, on city water	2002	12/13/1978	1/4/1979	1,3	Tap available and first billed for City water within one year of construction.
Dexter 2380 (actually 512 N. Maple Rd)	Chelsea Land Company Maple LLC (Rene Papo)	survey not completed "this address is a business"; The Vacuum Store [not in subdivision; 2390 Dexter on same parcel, including Fox's Towing; United Auto & Fleet Repair]	e	5 bldgs, built 1948-1958	1964	1/17/1963	1/9/1988	1	Site has been investigated by independent consultant as part of brownfield project(Phase I, II) no dw identified, and monitoring wells installed, sampled and plugged.
Ferry 3432	Andrea Duval	built 2004 & hooked up	d1	old house had well; kept open per 5/24/94 letter		3/12/2004		3	Property inspected by PLS and no well found; original structure demolished and replaced in 2004
Ferry 3445	Marcia Tyson	built 1925; survey not returned	d1	day care	2000	12/16/1986		3	Surveyed again 9/12/08 - owner of 10 years states well was removed when connected to City, not aware of who removed it. PLS staff examined property-no wells found
Glendale 312	Jeffrey S. Starman	not included [not in subdivision]	e	2 residences, built 1920 & ~1950	1989	6/12/1941	6/25/2003	3	Surveyed 9/12/08 - tenant of 5 yrs had no knowledge of wells. PLS staff inspected property - no wells found
Glendale S 402	Sarah Chamberlain	built 1953, tap date 3/22/52; no survey planned [not in subdivision]	e	city FOIA - meter set Mar 1977	2006	3/22/1952		1,3	Surveyed 9/12/08 - Owner of 23 yrs, house built approx. 1950, connected to City when built; no knowledge of wells
Glendale S 404	Michael J. & Joan Barrett Trust	built 1950; tap date 7/21/51; no survey planned [not in subdivision]	e	city FOIA - meter set Oct 1958	2006	7/2/1951		1,3	Surveyed - Owner of 42 yrs; house built 1950 and connected to City when built, no knowledge of wells
Jackson 1743	William Morgan	not included [built before Assessors Plat No. 4 was platted in 1920]	e	built 1901, before hook-up required	1964	7/17/1945	1/1/1982	2	Would have been required to hook up to City water at time of annexation 44 years ago.
Jackson 1903	Joseph Gebott & G. Dongvillo	not included [built before Assessors Plat No. 4 was platted in 1920]	e	built 1901, before hook-up required	1964	3/21/1986	1/5/1992	2	Would have been required to hook up to City water at time of annexation 44 years ago. Tap may not have been available until 1986, 22 yrs ago. Survey left at home 9/15/08.

Address	Current Owner	PLS Comments (as of 9/15/06 or other, where indicated) [DEQ information]	DEQ Code	MDEQ Additional Comments	Annexed	Tap Date	First billed for City water	Action Code	Comments (final)
Jackson 1921	Douglas Hastings	in 11/28/06 report; built 1914, tap date 5/16/79; 2/23/07 table says no response to survey [built before Assessor's Plat No. 4 was platted]	d1	city FOIA - meter set Oct 1996	1964	5/16/1979	1/10/1996	2,3	Would have been required to hook up to City water at time of annexation 44 years ago, but tap may not have been available until 1979; surveyed - owner of 53 years states no well on property (retired from City water dept.)
Jackson (vacant land - actually a cemetery)	Bethlehem Church	irrigation well; sample & request exception or amend order	c	Bethlehem Cemetery					
Jackson 3395	Tony J. Argiero Trust	city web site says built 1952; survey response - occupant of two years has no knowledge of wells; inspector could not find well	d1	kept open per 5/24/94 letter	1987	10/1/1986		3	Surveyed and inspected, no wells identified
Miller 1521	Patricia Materka	not included [not in subdivision]	e	built 1901	2003	5/26/1955	1/4/1990	A	No evidence of municipal water prior to 1990. Survey returned - well on premises not used since 1973 (when purchased by current owner). Well abandoned and log provided to MDEQ
Miller 1541	Fedele & L. Grammatico	not included [not in subdivision]	e	2 res, 1901 & 1959	1964	11/29/1951	no water	2	Tap available when annexed in 1964, would have been required to hook up at that time.
Miller 1553	David & Natalie Fulkerson	not included [not in subdivision]	e	built 1915	1982	5/8/1959	10/7/2005	2	Tap available when annexed in 1982, would have been required to hook up at that time.
Miller 1575	Crisca Bierwert	not included [not in subdivision]	e	built 1930	1979	7/6/1978	1/9/1993	2	Tap available when annexed in 1979, would have been required to hook up at that time.
Miller 1593	Gerald Nicks	not included [not in subdivision]	e	built 1930	1970	5/19/1959	1/4/1970	2	Tap available when annexed in 1970, would have been required to hook up at that time.
Miller 1605	Laura Dunbar	not included [not in subdivision]	e	built 1901	1983	10/17/1979	1/11/1979	2	Tap available when annexed in 1983, would have been required to hook up at that time.
Miller 1629	Katherine M. Babiak	not included [not in subdivision]	e	built 1901	1987	7/10/1986	1/7/1986	2	Tap available when annexed in 1987, would have been required to hook up at that time.
Miller 1645	Ellen J. Quart	built 1950; tap date 10/10/79; survey not returned as of 2/23/07	d1	city FOIA - meter set Oct 1979	2006	10/10/1979	1/10/1979	2	Not annexed until 2006, but has been on city water at least since 1979.
Newport 941	Cedric A. & Moragan H. Richner	not included [not in subdivision]	e	built 1901	1964	7/10/1985	10/3/2005	2	Old home, not annexed until 1964, no tap available until 1985, and not billed until 2005. Probably used a well within last 20 years. Survey left at home 9/15/08
Newport 1005	Sally & Randolph & Thomas Rudisill	in 11/28/06 report; built 1932, tap date 5/29/35; no survey planned	d1	city FOIA - meter set May 1990	prior to 1951	5/29/1935		1	Hooked up within one year of construction
Newport 1015		in 11/28/06 report; built 1936, tap date 5/29/35; no survey planned	e	city FOIA & water utilities, no info or account				n/a	No longer exists - part of 1005 Newport
Penncraft Ct 2000	Laszlo & Helen Slomovits	survey responses - all owners say homes were originally connected to community well (no longer in use); original owner at 2010 remembers well being filled in after hook-up [tap date 1964]	d1	attempt to locate & determine if plugged				3	Surveyed, community well taken out of service 44 years ago, original owner of 2010 says filled in. Inspector could not locate
Penncraft Ct 2003	Larry R. Berry c/o Mary Addington	no response to survey; 5/19/06 report shows built 1941, hooked to city water 1964 (same time as adjacent homes)	e	was there a separate well?				3	Surveyed, community well taken out of service 44 years ago, original owner of 2010 says filled in. Inspector could not locate

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Penncraft Ct 2005	Anne Ogren Trust	survey response - owner of 11 years reports there was a well in front of the house (in addition to community well); built 1953, hooked up 1964	d1	attempt to locate & determine if plugged				3	Surveyed, community well taken out of service 44 years ago, original owner of 2010 says filled in. Inspector could not locate
Penncraft Ct 2010	Timothy Jeris & Robyn Mierendorf	survey responses - all owners say homes were originally connected to community well (no longer in use); original owner at 2010 remembers well being filled in after hook-up [tap date 1964]						3	Surveyed, community well taken out of service 44 years ago, original owner of 2010 says filled in. Inspector could not locate
Penncraft Ct 2020	Robert W. Storer	survey responses - all owners say homes were originally connected to community well (no longer in use); original owner at 2010 remembers well being filled in after hook-up [tap date 1964]						3	Surveyed, community well taken out of service 44 years ago, original owner of 2010 says filled in. Inspector could not locate
Penncraft Ct 2021	Sandor & B. Slomovits	survey responses - all owners say homes were originally connected to community well (no longer in use); original owner at 2010 remembers well being filled in after hook-up [tap date 1964]						3	Surveyed, community well taken out of service 44 years ago, original owner of 2010 says filled in. Inspector could not locate
Pine Ridge 205	Ira E. Lax & Gari R. Stein Trust	not surveyed; Assessor's Plat #12	e	built 1939, before hook-up required		6/24/1939		1	Tap available at time of construction in 1939.
Pine Ridge 208	David & Connie Brown	not surveyed; Assessor's Plat #12	e	built 1940, before hook-up required		4/6/1940		1	Tap available at time of construction in 1940.
Pine Ridge 211	Cristin & Myron Grant	in 11/28/06 report; built 1911, tap date 4/26/84; 30 yr. owner has no knowledge of well [built before Assessor's Plat #12 was platted]	d1	city FOIA - meter set Sept 1996	1963	4/26/1984	1/9/1996	3	Already surveyed. No wells identified by owner. Annexed to the City in 1963 and has had municipal service available since at least 1984.
Pine Ridge 212	Dennis & Barbara Gala	not surveyed; Assessor's Plat #12	e	built 1940, before hook-up required		4/11/1940		1	Tap available at time of construction in 1940.
Pine Ridge 215	Gene & P. Thomas	in 11/28/06 report; built 1919, tap date 4/26/84, survey attempted 11/20/06, no one at home; 2/23/07 table says hooked up in 1923 [built before Assessor's Plat #12 was platted]	d1	city FOIA - meter set Nov 1985	1964	4/26/1984	1/11/1985	3	Already surveyed. No wells identified by owner. Annexed to the City in 1964 and has had municipal service since at least 1985.
Pine Ridge 216	Kendra Shih	in 11/28/06 report; built 1929, tap date 8/30/27, no survey planned [built before Assessor's Plat #12 was platted]	e	city FOIA - meter set Oct 1994		8/30/1927		1	Tap available prior to construction in 1929.
Pine Ridge 218	Helen M. Waldron	in 11/28/06 report; built 1925, tap date 11/2/26, no survey planned [built before Assessor's Plat #12 was platted]	e	city FOIA - meter set June 1959		11/2/1926		1	Tap available within one year of construction in 1926, house unlikely to have had a well.
Pine Ridge 300	Daniel Charles Isaksen	in 11/28/06 report; built 1926, tap date 8/8/28, no survey planned [built before Assessor's Plat #12 was platted]	d1	city FOIA - meter set Dec 1963		8/8/1928		1	Tap available at time of construction in 1928.

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Pine Ridge 301	Matthew Hull & Krisztina Fehervary	in 11/28/06 report; built 1922, tap date 4/10/25, no survey planned [built before Assessor's Plat #12 was platted]	d1	city FOIA - meter set Oct 1990		4/10/1925		1	Tap available since 1925, house built in 1922, unlikely to have also had a well.
Pine Ridge 304	Mary E. Mostaghim	in 11/28/06 report; built 1920, tap date 6/20/27, no survey planned [built before Assessor's Plat #12 was platted]	d1	city FOIA - meter set July 1977		6/20/1927		1	Tap available at time of construction in 1927.
Pine Ridge 305	Brian A. O'Donnell	in 11/28/06 report; built 1925, tap date 7/26/26, no survey planned [built before Assessor's Plat #12 was platted]	e	city FOIA - meter set June 1959		7/26/1926		1	Tap available at time of construction in 1926
Pine Ridge 311	Robert Stevenson	in 11/28/06 report; built 1924, tap date 10/7/27, no survey planned [built before Assessor's Plat #12 was platted]	d1	city FOIA - meter set Aug 1992	1964	10/7/1927	1/8/1992	1	Tap available at time of construction in 1927.
Pine Ridge 312	Eileen L. Oehler Trust	in 11/28/06 report; built 1928, tap date 1/9/29, no survey planned [built before Assessor's Plat #12 was platted]	e	city FOIA - meter set June 1959			1/9/1929	1	Tap available at time of construction in 1929
Porter 3404	Sara & Allison & Naomi Okuyama	built 1940; survey response - owner has lived there two months; has no knowledge of wells	d1	to be plugged per 5/24/94 letter	1988			L	Survey response from new owner, no knowledge of wells. Will inspect or send letter.
Porter 3415	Marianne Martin & Jo Ann Longanecker	occupant refused survey	d1		2001	1/16/1987		3	Well could not be located when PLS attempted to sample in past.
Rhea 281	Linda Berauer	built 1945; survey response - occupant has no knowledge of well but provided name of owner for more info	d1		1988	12/22/1986		L	Survey response from new tenant, no knowledge of wells. Will follow up with Owner and inspect or send letter.
Valley 2605	Amy Milligan & Kathleen Beauchamp	built 1941; survey not returned per 2/23/07 table	e		1969	9/30/1969	8/13/2002	2	Home surveyed and not returned. Tap was available in 1969 and would have required hook up at that time since it was annexed that year.
Valley 2615	Milledge & Phyllis Bullard	survey response - owner says built 1928; hooked up in 1968 but has no knowledge of wells	d1		2007	7/21/1970	1/7/1970	3	Surveyed, owner has no knowledge of wells. City service for at least 38 yrs.
Valley 2631	Annabelle Ehnis	survey response - owner of 28 years says built 1970, has no knowledge of wells	e	city web site says built 1959	1969	11/26/1968	1/11/1968	5	Surveyed, appears to have been in City when built. Service provided 1968, owner says home built in approx 1970. Possible error in City assessor database.
Valley 2645	Mary Ann Winkle	survey response - original owner says built 1970 and hooked to city when built	e	confirm in city when built or verify hook-up date	1967	12/15/1971	1/12/1990	5	In city when built and tap was available (1971).
Valley 2661	Cliff Chienping Ku & Diane Sheldon-Ku	built 1940; survey response - owner says not hooked up when built but has no knowledge of wells	d1		1969	3/7/1969	1/3/1969	2,3	Service started when annexed in 1969. Property already surveyed an owner has no knowledge of wells.
Valley 2667	Curtis N. Lee & Angela K. Guy-Lee	built 1969; survey not returned, house empty, foreclosure in process	e		1968	8/5/1968	1/1/1969	4	Hooked up and annexed within one year of construction

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Valley 2675	Christy Rishoi & Larry R. Juchartz	survey response - owner of two years says hooked up when built in 1968; no knowledge of well	e	confirm in city when built or verify hook-up date	1968	8/6/1968	1/3/1969	4	Hooked up and annexed within one year of construction
Valley 2681	Charlene Davies	built 1969; survey response - owner says no well	e	confirm in city when built or verify hook-up date	1968	8/6/1968	1/3/1969	4	Hooked up and annexed within one year of construction
Valley 2689	Betsey K. Murray	built 1969; survey response - occupant does not know if hooked up when built, has no knowledge of wells	e		1968	8/7/1968	1/4/1969	4	Hooked up and annexed within one year of construction
Valley 2695	Patricia A. Smith Trust	built 1969; occupant refused survey	e		1968	8/7/1968	1/2/1969	4	Hooked up and annexed within one year of construction
Valley 2721	Karen Zorn	built 1928; survey mailed to property owner; no response as of 2/23/07	e		1969	6/27/1968	10/11/2000	3	Required to have municipal service since annexation in 1969, since tap available at that time. Surveyed - resident not aware of any wells, allowed PLS staff to inspect property, no wells identified
Valley 2731	Richard & C. Stoll	survey response - owner since 1978 says hooked up when built in 1973, no knowledge of wells	e	confirm in city when built or verify hook-up date	1970	9/11/1970	9/29/2004	4	City site says built 1971; Annexed and hooked up within one year of construction
Valley 2741	Asim Khan	survey response - owner says built 1978, does not know if hooked up when built; has no knowledge of wells	e		1979	5/31/1978	1/6/1978	4	Annexed to the City and billed for water within one year of construction
Valley 2825	Annabella Clark & Carolyn A. Cruz & Margaret Rose Conlon	survey response - original owner says built 1951; believes hooked to city water 1970-1980, not sure if plugged	d1		1981	11/28/1978	1/12/1978	3	Surveyed, original owner has no knowledge of wells and well not located by inspector. Municipal service at least since 1978 and was annexed in 1981.
Valley 2835	David C. Conlon Trust & Margaret Rose Conlon Trust	survey response - original owner says built 1980 (same as city records) and hooked up when built	e	confirm in city when built or verify hook-up date	1980	5/13/1980	1/5/1980	4	City site says built 1980; Annexed and hooked up within one year of construction
Valley 2949	Lora J. Lopez	not included	e	confirm in city when built or verify hook-up date; built 2002, has city water	2002	nothing	6/20/2002	4	City site says built in 2002; Annexed and hooked up within one year of construction
Wagner S 137	Mark Amezcua	house built 2003 per 5/19/06 report	e	confirm was in city when built or verify hook-up date	2003	11/1/2002	8/22/2003	4	City site says built in 2003; Annexed and hooked up within one year of construction
Wagner S 215	Jason N. Lawrence	house built 1997 per 5/19/06 report	e	confirm was in city when built or verify hook-up date	2001	3/12/1997	1/3/1997	4	City sites says built in 1997; Annexed and hooked up within one year of construction
Wagner S 249	Kathleen Powell	survey response - owner of 8 years says built 1926; doesn't know if well abandoned	d1		1987	12/18/1986		L	Will inspect or follow up with letter
Wagner S 267	Priscilla Cheever	survey mailed to property owner; no response as of 2/23/07	d1		1988	12/23/1986		L	Will inspect or follow up with letter
Wagner S 359	Douglas W. & Lisa Richardson Trust	survey mailed to property owner; no response as of 2/23/07	d1		1988	1/12/1987		L	Will inspect or follow up with letter

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Wagner S 685	Option One Mortgage Corp	owner has not signed PLS contract to connect & plug well; 3/9/07 PLS suggests periodic reminders for one year, re-evaluate	d2	annual monitoring & letter				d2	Previous owner refused connection; non-detect for 20+ years. Notice sent to bank holding foreclosure deed. Will send annual monitoring results
Wagner S 697	Francis B. Schneider	owner has not signed PLS contract to connect & plug well; 3/9/07 PLS suggests periodic reminders for one year, re-evaluate	d2	annual monitoring & letter				d2	Owner has refused hook up, non-detect for 20+ years. Will send annual monitoring results
Westover 60	Robert C. Horvath	not surveyed; house built 2004 per 2/28/06 report	e	confirm in city when built or verify hook-up date		2/24/2004		5	House in City limits and tap available at time of construction in 2004.
Westover 75	Angela Rowlands	not surveyed; house built 2004 per 2/28/06 report	e	confirm in city when built or verify hook-up date		5/27/2004		5	House in City limits and tap available at time of construction in 2004.
Westover 160	Jerry L. & Jennifer McGlothlin	not surveyed; house built 2000 per 2/28/06 report	e	confirm in city when built or verify hook-up date		4/18/2000		5	House in City limits and tap available at time of construction in 2000.
Westover 211	Matthew L. Allen & Meghan S. Gerard	survey response - owner of 6 years says built 1920s; unsure if well plugged	d1	kept open per 5/24/94 letter	1988	12/19/1986		L	Will inspect or follow up with letter

FOOTNOTES

1 - well abandonment log (WAL) on file if "x"; not applicable if "NA"
2 - well not plugged or not documented to be plugged if "1"; no well or former well plugged if "0"

DEQ Comment Codes (additional explanation in DEQ

July 21 letter)
a1 - no further action; no evidence of a well
a2 - no further action; well plugged
b - DEQ approved monitoring well
c - will consider exception
d1 - well known to exist; hooked up to city water
d2 - well used for drinking water
e - potential existence of well not eliminated

PLS Comment Codes (additional explanation in PLS

October 23rd letter)
1 - no further action; appears to have been provided municipal water within one year of construction.
2 - no further action; appears to have been annexed and provided municipal water more than 20 years ago.
3 - no further action, property already surveyed and/or inspected and no further evidence of existing well.
4 - no further action, appears to have been annexed within one year of construction
5 - no further action, appears to have been in city when built (and have tap available)
d2 - well currently used for drinking water
e - potential existence of well not eliminated
A - well located and abandoned
L - well known to be in use within last 20 years and abandonment cannot be confirmed through reliable survey or inspection.