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**From:** Kolon, Sybil (DEQ)  
**Sent:** Tuesday, January 06, 2009 10:19 AM  
**To:** Farsad\_Fotouhi@pall.com  
**Cc:** jwbrode@ftch.com; Cogger, Jim (DEQ); Mandle, Richard; Adelman, Mitch (DEQ); Gill, Celeste (AG); Beyer, Laurel; Caldwell, Michael  
**Subject:** Re: PLS-08-07 Update

Farsad,  
Mitch, Jim Cogger and I are available for a technical call from 2-2:30 this afternoon. We will be in our conference room G. The phone number is 517-780-7970. Let us know if you will call us or if you want us to call you.

For your information, I am including a link to our letter dated Oct. 31, 2007 ([http://www.michigan.gov/documents/deq/deq-rrd-GS-GSIWagnerResponse10-2007\\_216269\\_7.pdf](http://www.michigan.gov/documents/deq/deq-rrd-GS-GSIWagnerResponse10-2007_216269_7.pdf)) and the memo of same date from Jim Cogger ([http://www.michigan.gov/documents/deq/deq-rrd-GS-GSIWRIRCommentsMemo\\_216267\\_7.pdf](http://www.michigan.gov/documents/deq/deq-rrd-GS-GSIWRIRCommentsMemo_216267_7.pdf)), in which we requested a monitor well (nested based on vertical profile results) in the Nancy Drive area.

PLS subsequently installed MW-118 on Ferry near Wagner. That did not address our concerns with defining the extent further west. Our subsequent requests for a well in the Nancy Drive area may have focused on our concern with the source of the Dupont Circle area, but did not negate the need for defining the northern extent of groundwater contamination south of Jackson Road and west of Wagner.

Please confirm your availability for a call at 2 PM and who will call whom.  
Sybil

Sybil Kolon  
Jackson District Office  
Remediation and Redevelopment Division  
Department of Environmental Quality  
301 E. Louis Glick Hwy.  
Jackson, MI 49201  
phone: 517-780-7937  
fax: 517-780-7855  
e-mail: [kolons@michigan.gov](mailto:kolons@michigan.gov)

>>> <Farsad\_Fotouhi@pall.com> 1/5/2009 2:33 PM >>>  
Sybil,

We would like to schedule a time to discuss this request. We are available tomorrow at 2:00, and Friday at 9:00.

We are not in agreement with your request to install a set of wells at this location at this time. The reasons you give for installing three wells are clearly not consistent with your original goal of drilling at this location (which is provided below for your reference). As stated in your letter, it was MDEQs position that "inadequate data have been presented to conclude that contamination in the Nancy Drive area is not the source of contamination in the Dupont area". At the time your letter was prepared, PLS strongly believed that MDEQs hypothesis was not supported by empirical data, including water quality from MW-118 and water level and quality data which have clearly shown that groundwater flow from the TW-11 is to the east. Nevertheless, PLS agreed to collect more data in the Nancy Drive area and in the area northwest of Dupont (MW-121s/d) to test MDEQ hypothesis. With these new data, we now believe that we have unequivocally ruled out MDEQs hypothesis that the source of the Dupont area contamination is the area along Nancy Drive. As such, installing wells at the location to address this issue would be an unnecessary diversion of resources. With this recent work, we have also further defined the extent of the plumes to

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the north, confirming our previous interpretations of the plume boundaries in this area.

The MDEQ is now suggesting the installation of three wells at the Nancy Drive boring for purposes other than originally communicated, including monitoring a plume that may not even be associated with the PLS site. PLS disagrees that positioning well(s) in this location will even address your reasons for installing them. We can discuss this issue further during our discussion.

June 23, 2008 MDEQ Letter from Sybil Kolon to PLS

"It is more appropriate to consider water quality data from the TW-11 boring (about 375 feet southwest of GSI-98-01) to evaluate the possibility that a plume could be migrating from the area near the south end of Nancy Drive toward the Dupont area. First, high concentrations of 1,4-dioxane (3,100 ppb) were found during the boring of TW-11 in December 2001, at a depth similar to the well at 465 Dupont Circle. As noted by Mr. Coger, Figure 8 of the Dupont Report indicates groundwater flow in the TW-11 area is from the southwest to the northeast, in the direction of the Dupont area. The only boring between TW-11 and MW-118, a distance of 1,800 feet, is GSI-98-01, where PLS has indicated that attempts to collect water quality data were unsuccessful. There is no basis for PLS to assert that the information gathered during the drilling of MW-118 demonstrates that there is no groundwater contamination migrating from the area around Nancy Drive toward the Dupont area. Inadequate data have been presented to conclude that contamination in the Nancy Drive area is not the source of contamination in the Dupont area."

Thank you.

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Farsad Fotouhi  
Pall Corporation  
Office (734) 913-6130  
farsad\_fotouhi@pall.com

"Sybil Kolon"  
<kolons@michigan.gov>  
To  
Farsad Fotouhi/AnnArbor/Pall@Pall  
01/05/2009 10:38 AM cc  
"Adelman, Mitchell"  
<ADELMANM@michigan.gov>, "Caldwell,  
Michael" <mcaldwell@zkac.com>,  
"Coger, James"  
<COGERJ@michigan.gov>, "Gill,  
Celeste" <GillCR@michigan.gov>,  
jwbrode@ftch.com, Laurel  
Beyer/AnnArbor/Pall@Pall, "Mandle,  
Richard" <MANDLER@michigan.gov>,  
mnaud@ci.ann-arbor.mi.us  
Subject  
Re: PLS-08-07 Update

10/12/2009

Farsad,  
Mitch, Jim and I have discussed the need for a monitoring well cluster at the Nancy Drive boring location and have gotten input from Rick Mandle. A monitoring well cluster is required at this location for several reasons:

- to define and monitor the northern extent of groundwater contamination throughout the water bearing units in this area
- to evaluate what impact the long term purging (TW-11, South Horizontal Well) has had on vertical and horizontal gradients
- to assess what happens with groundwater flow direction when deep and shallow purging is reduced or stopped

We believe a cluster of three monitoring wells are needed at about 40 and 80 feet, and in the sand and gravel unit encountered between 172-195 feet. Please give me a call if you would like to discuss. Jim is here today, I will be leaving at 2 PM. We are also available tomorrow.  
Sybil

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