



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

March 22, 2004

VIA ELECTRONIC AND US MAIL

Mr. Farsad Fotouhi
Environmental Manager
Pall Life Sciences, Inc.
600 South Wagner Road
Ann Arbor, MI 48103-9019

Mr. Alan D. Wasserman
Williams Acosta, PLLC
2430 First National Bank Building
Detroit, MI 48226-3535

Mr. Michael L. Caldwell
Fink, Zausmer & Kaufman
31700 Middlebelt Road, Suite 150
Farmington Hills, MI 48334

Dear Sirs:

SUBJECT: Gelman Sciences, Inc. (GSI) Remedial Action
Work Plan for the Installation of Two Extraction Wells
Unit E Aquifer, February 24, 2004

We have received and reviewed the above referenced work plan. The schedule for the first task, installation of wells, was to begin on March 15, 2004. On Monday, March 8, I sent Mr. Fotouhi electronic mail to set up a conference call to discuss the work plan. On March 9, having received no response, I left Mr. Fotouhi a voice mail message indicating that our comments on the work plan could impact Pall Life Sciences' (PLS) mobilization plans. Mr. Fotouhi then responded by electronic mail, setting up a time to discuss the work plan on Thursday, March 11. On March 10, Mr. Fotouhi sent me electronic mail to inform us that drilling for the first boring had begun on Tuesday, March 9.

The Department of Environmental Quality (DEQ) makes every effort to respond to your submittals in a timely manner to allow response actions at the site to proceed as quickly as possible. We often make comments that PLS incorporates into its work. As part of our authority to oversee response actions at the site, the DEQ must have the opportunity to comment on and observe these response actions. We understand that PLS was attempting to make the most efficient use of its contractors in moving up the implementation schedule. However, as is clear from the sequence of communications outlined above, PLS did not inform the DEQ of its intentions at the time that decisions regarding this work had been made. We trust that PLS understands our position and will provide us with adequate notification in the future.

During our discussion with Mr. Fotouhi and Mr. James Brode on March 11, we were informed that the first boring was nearly completed at that time, and only low levels of 1,4-dioxane had been detected in the Unit E aquifer during vertical aquifer sampling. Therefore, PLS will not install an extraction well at that location. Further drilling to identify suitable extraction locations has been put on hold while work proceeds on installation of the *In-situ* testing at the Maple Village Shopping Center.

As we informed Mr. Fotouhi during our telephone call on March 11, we believe that extraction locations closer to Wagner Road would be more useful. Extraction wells at this location would be more likely to capture the entire width of the plume at this location, and would have a longer useful life because of the larger mass of contamination upgradient of that location.

We recognize there is a need to balance the length of time to get access off of the PLS property compared to installation of extraction wells and pipelines on PLS property. Mr. Fotouhi agreed to investigate the possibility of obtaining access for installation of extraction wells near Wagner Road.

The work plan states that these extraction wells are intended to reduce the mass of 1,4-dioxane in the Unit E aquifer. When we suggested this work, we also recommended that the extraction wells be located to cut off further migration of contamination to the east, if possible. There is no indication in the work plan that this was considered. As PLS considers the relocation of one or both of the extraction wells, we request that consideration be given to cutting off further migration of contamination. In addition, the extraction wells should be sized to allow for extraction of a volume of water that could achieve that goal in the future, even if there is not adequate treatment capacity at this time.

Consideration should also be given to monitoring the effectiveness of the extraction, once it is implemented, on the Unit E aquifer, as well as any effects on the shallower Unit C³ and Unit D² aquifers.

Please respond to the issues raised in this letter by April 5, including the results of your attempts to secure access near Wagner Road and your evaluation of the feasibility of cutting off the migration of contamination using two extraction wells on PLS property and/or near Wagner Road. PLS should notify the DEQ of its proposed changes to the work plan due to the results of the first boring, as soon as that has been determined. In addition, PLS should notify the DEQ as soon as a date for field work has been agreed to with your contractor.

A report on the work performed should be submitted within 30 days of completion of the work. This report should also explain the rationale for determining extraction rates from these wells, any adjustments to extraction from other extraction wells in the area, and how the effectiveness of the additional extraction will be determined. We recognize that adjustments to the initial extraction rates are likely, and request that you keep us informed as significant changes are made.

Please contact me if you have questions or would like to discuss these matters in more detail.

Sincerely,

Sybil Kolon
Environmental Quality Analyst
Gelman Sciences Project Coordinator
Remediation and Redevelopment Division
517-780-7937

SK/KJ

cc: Ms. Mary Ann Bartlett, Pall Corp.
Mr. Robert Reichel, DAG
Mr. Mitchell Adelman, DEQ/GSI File
Mr. Leonard Lipinski, DEQ