



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

VIA ELECTRONIC AND US MAIL

October 26, 2005

Mr. Farsad Fotouhi
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Pall Life Sciences, Inc.
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Mr. Alan D. Wasserman
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Mr. Michael L. Caldwell
Zausmer, Kaufman,
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31700 Middlebelt Road,
Suite 150
Farmington Hills, MI 48334

Dear Sirs:

SUBJECT: Gelman Sciences, Inc. (GSI) Remedial Action
Unit E Monitoring Plan - DEQ Proposed Resolution of Dispute Pursuant to
Section XVI of Consent Judgment in Response to a letter from
Mr. Michael Caldwell dated August 12, 2005

This letter serves as the Department of Environmental Quality's (DEQ) response to Mr. Caldwell's letter dated August 12, 2005. In that letter, Pall Life Sciences (PLS) invoked the dispute resolution process in Section XVI of the Consent Judgment, regarding the DEQ's July 12, 2005 letter requesting a monitoring plan for the Unit E Aquifer. The parties have mutually agreed to extend the time to voluntarily resolve this dispute until October 26, 2005.

In an attempt to resolve this dispute voluntarily, the DEQ and Pall Life Sciences (PLS) discussed this matter during a conference call on September 21, 2005. The DEQ sent PLS electronic mail, dated October 7, 2005, proposing four monitoring well (MW) locations to monitor the Unit E plume in relation to the Prohibition Zone. Meetings that had been planned to discuss this and other issues have been canceled due to schedule conflicts. In response to a DEQ request, PLS responded to our suggested MW locations by electronic mail dated October 17, 2005, stating that PLS was willing to install only two of the four MWs requested by the DEQ.

A subsequent meeting scheduled for October 24, 2005 was also canceled. The DEQ had intended to explain our reasons for requesting each of the four wells at that meeting. The DEQ's technical staff has carefully reviewed the four requested locations and our position remains that MWs are needed at each of these locations to monitor the Unit E plume to ensure that it does not migrate outside of the Prohibition Zone.

The DEQ's resolution of the dispute is for PLS to install monitoring wells at the locations listed below, using approved vertical profiling methods. Depending on the lithology and water quality results from vertical profiling, one or more of these locations may need to be nested clusters with MWs at more than one depth. These locations are approximate and subject to further discussion and consideration of the existing conditions in these developed areas. We are willing to visit the area with PLS staff to determine the best location for MWs in these areas, considering topography and the existing infrastructure. PLS has agreed to install MWs at locations #2 and #4.

1. On the south side of Valley Drive near the intersection of Clarendon Street;
2. Near the northwest corner of the intersection of Dexter Road and North Maple Road;
3. Near the intersection of Leona Drive and Susan Drive;
4. Near the intersection of Abbott Avenue and Glendale Drive.

Monitoring wells at these locations are required for several general and specific reasons. As stated in our letter of July 12, 2005, "... additional monitoring wells need to be installed this year along the north and south flanks of the Unit E plume, to ensure that the plume is not migrating beyond the north and south boundaries of the Prohibition Zone." PLS contends that the downgradient investigation will be adequate to track the plume. We do not agree. We have limited information about the lithology in the areas north and south of PLS's depiction of the current location of the plume and in the downgradient areas, where investigation has not yet begun because of prolonged delays due to problems with access.

The downgradient investigation will help us determine if the plume will continue to migrate in a general easterly direction, as we expect. However, that investigation is more than a mile downgradient of the current known leading edge of the Unit E plume. It is not possible for such an investigation to ensure that there are no migration pathways that would allow some of the contamination to migrate to the north or south of the Prohibition Zone. In fact, according to PLS's own depiction of the northern edge of the Unit E plume, it is within 280 feet of the southern border of the Prohibition Zone on Valley Drive, from Pinewood Street to Dexter Road, a distance of over 1,500 feet.

PLS contends that a MW is not needed at location #1 because of monitoring at MW-400 Clarendon and IW-1. We do not agree for the following reasons: 1) in order to be protective of public health, the Unit E plume has to be monitored inside of the Prohibition Zone, to ensure the plume will be detected before it migrates beyond the Prohibition Zone Boundary; 2) MW-400 Clarendon was not vertically profiled when it was installed, and the adjacent residential well (the depth of which is not known) had 192 parts per billion (ppb) of 1,4-dioxane in January 2005; IW-1 has not been sampled since June 2002 and is no longer on a regular sampling schedule; 3) the MW that PLS has agreed to install at location #2 is about 1,500 feet to the east and will not be adequate to monitor the plume at location #1. We anticipate that a nested cluster of MWs will be needed at this location.

PLS contends that a MW is not needed at location #3 because MW-91 was installed for this purpose. Although location #3 is relatively close to MW-91 (about 700 feet), we have requested it because of a significant change in geology along a line that occurs near Maple Road (which we have discussed with you in the past). As you know, there is a major difference in the water quality and groundwater elevation from MWs on either side of this line, as shown by the data from MW-81 (276 ppb in April 2005, groundwater elevation of 866.05 feet) and MW-91 (has always been non-detect, groundwater elevation of 852.45 feet). The distance between these two wells is about 1,000 feet. These differences are exhibited by other MWs on either side of the apparent change in geology, and suggest that there may be a more northeasterly flow of groundwater on the upgradient side of this line. A MW is required at this location to better determine groundwater flow direction and contaminant distribution in this area.

Mr. Farsad Fotouhi
Mr. Alan D. Wasserman
Mr. Michael L. Caldwell

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October 26, 2005

Please provide us with a map showing the proposed locations, for our approval, and notify us at least three days before drilling is scheduled.

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, Department of Attorney General
Mr. Mitchell Adelman, DEQ/Gelman File
Mr. Leonard Lipinski, DEQ
Mr. James Coger, DEQ