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To: Gelman Information
Date: 10/28/2005 2:57:12 PM
Subject: Fwd: Transmission Pipeline Update

The purpose of this note is to provide an update to our first note on this topic, dated 10/24/05 (attached for reference).

Pall Life Sciences (PLS) resumed extraction from three Evergreen extraction wells (LB-1, LB-2 and AE-3) on 10/24/05. As of 10/25, 190 gallons per minute (gpm) were being extracted and only 36 gpm of that amount was being transferred to the treatment system; the remainder is believed to be leaking back into the contaminated aquifer, in the vicinity of Jackson Road.

We recognize that this is an imperfect solution, at best. Although it is intended to be temporary, it is likely that it will continue for at least a few months. We know this may affect the migration of the plume; however, we believe it is preferable to turning off the Evergreen extraction wells and allowing the leading edge of the plume to migrate beyond its current location, into areas that are not contaminated. We are considering the need for additional monitoring to determine the effect this leak is having on the aquifer.

The factors that mitigate the potential harmful effects of the pipeline leak are:

- the leak is within the Prohibition Zone restricting the use of groundwater; therefore, there is no immediate threat of exposure through drinking water;
- the groundwater in this area is known to be migrating toward the Evergreen extraction wells, toward which most or all of this contamination is likely to migrate;
- the north horizontal wells continue to operate, which will help to offset some of the leakage from the pipeline.

It has been suggested that the pipeline leak is a violation of the NPDES permit. We have discussed this with Water Bureau staff and the DEQ does not agree that this is the case. The permit authorizes discharge from the groundwater remediation treatment facility; it does not regulate the contaminated water before it gets to the treatment system. The leaking pipeline has not had any negative effect on the treatment system, the Honey Creek tributary or groundwater in proximity to the tributary. The DEQ has no basis to assert that any violations of the permit are occurring.

We will be meeting with PLS next week to discuss this situation. We will be discussing what can be done to monitor and minimize the potential negative effects of the pipeline leak and to identify and implement an alternate method of transporting the contaminated groundwater from the Evergreen extraction wells for treatment and discharge at another location, as well as an accelerated schedule for doing so.

We will continue to update you about this situation. Please contact me if you have any questions.

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