



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

July 11, 2005

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
Zausmer, Kaufman,
August & Caldwell, P.C.
31700 Middlebelt Road,
Suite 150
Farmington Hills, MI 48334

Dear Sirs:

SUBJECT: Gelman Sciences, Inc. Remedial Action
Preliminary Response to Work Plan for Well Identification, Abandonment and
Replacement of Certain Private Water Supply Wells, dated June 17, 2005

We have done a preliminary review of the above referenced work plan. We will be providing our full response in about four weeks. The purpose of this letter is mainly to highlight our concerns with various schedule related items, as the groundwater use restriction is now in place and every effort must be made to ensure that any exposure pathways are eliminated as soon as possible.

Our primary concern is with areas where the plume (above 85 parts per billion {ppb} of dioxane) is known to exist, as well as adjacent and immediately downgradient areas, as defined by the north and south boundaries of the prohibition zone (PZ), extending from Wagner Road to approximately Glendale. PLS should focus its initial well identification efforts in this area (western PZ). We also want to receive information more frequently than proposed, in addition to the full report at the end of the well identification phase of the work plan. We would also like to clarify that once the need for municipal connection and/or well abandonment are established at any given property, the process for doing so should begin.

Section I - Identification of Existing Private Drinking Water Wells Within the PZ.

This section of the work plan should be intended to identify any current or former water supply wells within the PZ that have not been abandoned.

Table 1 lists all properties PLS has located that are within the political boundaries of Scio Township or Ann Arbor Township. There are 7 wells in Table 1 with "no" in the "City Water?" column. The process for having these properties connected to the municipal water supply system, and the wells abandoned, should begin immediately. If PLS intends to provide information to show that any of these wells fit one of the exceptions outlined in the court order, PLS should provide that information to the DEQ by July 22, 2005 (on 6/17 Mike Caldwell left me a voice mail message saying PLS would submit such information on the Wagner Road wells within about a week).

There are eight properties listed in Table 1 that are known to have a connection to the city water supply, seven of which are west of Glendale. These seven properties should be included in Task 1, to determine if any wells exist that need to be abandoned.

Task 2 should start with the western PZ, as described above. The DEQ should be informed of any vulnerable properties and these properties should be surveyed, as described in Task 1, within one month of identification.

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A list of any wells identified (in addition to the "no city water" properties listed in Table 1) should be transmitted to the DEQ within two weeks of identification, at which time PLS should indicate if it intends to provide information to show that the well fits one of the exceptions outlined in the court order. PLS should then provide that information to the DEQ within one month. If PLS does not believe any of the exceptions apply, the process for having these properties connected to the municipal water supply system, and/or the wells abandoned, should begin immediately. We note that PLS has located a former water supply well at 2575 Valley, which is in the PZ, and has not been mentioned in the work plan. PLS should include this well in the first set of information to be provided to us, as described in this paragraph.

Once the western PZ tasks are complete, the remainder of the work plan can be implemented for the eastern PZ.

Section III, Connection to Municipal Water, refers to a Consent to Connection form acceptable to PLS and the DEQ. I have located a form used by the DEQ when the state pays for connection to municipal water. It also covers abandonment of the existing well. I have modified that form to reflect the current circumstances and have attached it for your review. Please let me know if this form is acceptable to PLS, and if not, provide PLS's draft for our approval.

Please contact me or Assistant Attorney General Robert Reichel by July 22, 2005, if you have any questions or do not intend to comply with any of the requests in this letter.

Sincerely,

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

SK/KJ

Attachment

cc: Ms. Mary Ann Bartlett, Pall Corp.
Mr. Robert Reichel, Department of Attorney General
Mr. Mitchell Adelman, DEQ/Gelman File
Mr. Leonard Lipinski, DEQ

**CONNECTION TO COMMUNITY WATER SUPPLY
AGREEMENT/WAIVER**

Owner Name	Daytime Telephone Number ()
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Property Address	Street/City/Zip
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Owner Address If Different From Above	Street/City/Zip	Telephone Number ()
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ALL OWNERS MUST SIGN THIS FORM

As owner(s) of the above listed property, I authorize Pall Life Sciences (PLS) and its designated contractors access to the property noted above, including the interior of the house, to install a complete connection (hook-up, service line, meter setting, plumbing connection, and property restoration) to the available water system, and work activities necessary to abandon all wells on the property.

I understand that should the authorized service connection be completed, it will be at no charge to me. I understand that I will be responsible to pay costs associated with water usage.

Signature

Date

Signature

Date

**For additional information or questions contact PLS at:
Farsad Fotouhi**

xxxxxxx

**Or you may contact the Michigan Department of
Environmental Quality at:**

**Sybil Kolon
Remediation and Redevelopment Division/DEQ
301 E. Louis Glick Hwy.
Jackson, MI 49201**

**517-780-7937
kolons@michigan.gov**

Retain a copy for your records and return the original to PLS.

This form approved by DEQ for use by PLS