



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



STEVEN E. CHESTER  
DIRECTOR

September 9, 2005

VIA E-MAIL and U.S. 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  
Zausmer, Kaufman,  
August & Caldwell, P.C.  
31700 Middlebelt Road,  
Suite 150  
Farmington Hills, MI 48334

Dear Sirs:

SUBJECT: Gelman Sciences, Inc. Remedial Action  
Review of Available Water Quality, Well Construction, and Geologic Records for  
Six Residential Wells Along South Wagner Road, dated July 19, 2005

The Department of Environmental Quality (DEQ) has completed our review of the above referenced submittal, which was submitted by Pall Life Sciences (PLS) pursuant to the May 17, 2005 Washtenaw County Circuit Court Order Prohibiting Groundwater Use (Order). Paragraph 5(e) of the Order allows for exceptions to the prohibition of the use of "any existing water supply well that has been demonstrated, on a case-by-case basis and with the written approval of the MDEQ, to draw water from a formation that is not likely to become contaminated with 1,4-dioxane emanating from the PLS facility. Such wells shall be monitored for 1,4-dioxane by PLS at a frequency determined by the MDEQ." This exception was added to the Order at the direction of the Court, after the hearing on May 4, 2005.

With respect to PLS's submittal, the DEQ does not believe it is prudent to allow this exception for these water supply wells (597, 603, 609, 679, 685 and 697 South Wagner Road) that are the sole source of drinking water in such close proximity to the groundwater contamination, as detailed below.

Accordingly, the DEQ denies PLS's request for an exception from the Order for the six wells on South Wagner Road for the following reasons.

- PLS states in its request for these exceptions that, for the purposes of the submittal, it assumes these wells are within the Unit E aquifer. The Unit E aquifer is a formation that is already contaminated in the immediate vicinity. Therefore, because these wells are assumed to be in the same formation, the Order requires the DEQ to deny this request.
- There is no reliable information on the depth of these wells or where they are screened (the one well log provided was for 685 North Wagner, in Section 23); four of these wells have not been sampled in five years or more, so there is not 20 years of data, as PLS asserts; the geology of this area is known to be very complex and interconnected; PLS has been unable to explain the existence of the contamination at MW-65d and why it is apparently disconnected from the main body of the Unit E plume; there is no specific geological information in the immediate vicinity of where the wells are screened; if these wells are not in the Unit E aquifer, they could be screened in shallower formations where groundwater contamination is found in close proximity.

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- These wells would eventually fail and new wells would be prohibited, as provided in the Order establishing the PZ. PLS would still be obligated to provide connection to the municipal water supply at these locations at that time. In addition, the Washtenaw County Road Commission plans to widen South Wagner Road between Jackson and Liberty in the spring of 2006, and it would be most economical and least disruptive to provide the connection to the municipal water supply before this construction is completed.

While there may be circumstances where it would be reasonable to grant exceptions to the Order, particularly if the wells are not used for drinking water, this request clearly does not meet the conditions of the exception as the DEQ interprets it.

PLS should follow the guidelines for providing connection to the municipal water supply and well abandonment outlined in our letter dated August 12, 2005, in response to your June 17, 2005 submittal relating to abandonment and replacement of certain private water supply wells. Please inform us by September 23, 2005 of your intention to provide the required connections. This includes sampling and analyzing the well water prior to abandonment. Please contact me if you have any questions.

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