



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



April 26, 2006

VIA E-MAIL & US MAIL

Mr. Farsad Fotouhi
Environmental Manager
Pall Life Sciences, Inc.
600 South Wagner Road
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Mr. Alan D. Wasserman
Williams Acosta, PLLC
2430 First National Bank
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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
Interim Response Work Plan, Western System, dated January 27, 2006

We have completed our review of the above referenced submittal. We had mutually agreed that the Department of Environmental Quality (DEQ) would delay its response to the submittal to allow Pall Life Sciences (PLS) and the DEQ to discuss the submittal in more detail. These discussions took place at a meeting on April 4, 2006 and during a telephone conference call on April 12, 2006.

As indicated in the attached Interoffice Communication from Mr. Jim Coger, dated April 26, 2006, the DEQ does not agree that the extent of contamination has been adequately defined. The adequacy of the proposed interim response cannot be evaluated before the two monitoring wells discussed by Mr. Coger are installed.

The DEQ had requested two monitoring wells to define the extent of contamination in our letter dated April 4, 2005. After our recent discussions, we have adjusted the location of the monitoring well previously proposed on the north edge of the Sunward Cohousing parking lot. A third location may be needed to better understand the contamination at 5005 Jackson Road.

PLS does not list the water supply well at 5005 Jackson Road in its discussion under "Site Specific Conditions". This well provides a potential exposure pathway and has the highest concentration of 1,4-dioxane of any water supply wells currently in use in the Gelman Sciences Inc. site area. Until the extent of contamination is defined, it is not possible to say that this, or other water supply wells in the area, will remain below the generic residential cleanup criterion of 85 parts per billion, as stated in the work plan. As long as drinking water wells remain in use in this area, drinking water is a potential exposure pathway that must be addressed by any remedy proposed.

We also believe it would be useful to know the concentration of 1,4-dioxane in the Ann Arbor Cleaning Supply (A2CS) well during purging. Previous samples have only been collected when the well was not being purged. Because MW-53i is about ten feet north of the A2CS, and is screened at the same depth, we believe sampling of this well at the same time could provide useful information.

Mr. Farsad Fotouhi
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-2-

April 26, 2006

As we requested in an e-mail dated April 12, 2006, three samples should be collected from the purge well during the next scheduled batch purging, if this has not yet been done: 1) when purging begins, 2) when about half of the volume has been purged, and 3) at the end of purging. Three samples should also be collected from MW-53i, immediately after each of the three samples has been collected from the A2CS well. Static water levels from these two wells should be collected at the same frequency as the water quality samples. The regular monthly sampling of these wells should continue.

Monthly batch purging from the extraction well should continue until an alternative remedy or interim response is agreed to.

We have scheduled a telephone conference call for 9:00 a.m. on Thursday, May 4, 2006, to discuss this letter and PLS's response to it.

Sincerely,

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

SK/KJ

Attachment

cc/att: Mr. Robert Reichel, Department of Attorney General
Ms. Celeste Gill, Department of Attorney General
Mr. Mitchell Adelman, DEQ/Gelman File
Mr. James Cogger, DEQ