



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



STEVEN E. CHESTER  
DIRECTOR

July 17, 2006

VIA ELECTRONIC & 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  
Well Identification Report dated May 19, 2006

We have reviewed the above referenced submittal and our comments are provided below.

Proposed PZ Boundary

We are not convinced that the area proposed by Pall Life Sciences (PLS) for expansion of the Prohibition Zone (PZ) will provide an adequate buffer area. The information cited in the report is very preliminary and cannot be relied upon to determine the new PZ boundary. We believe the proposed expansion of the PZ shown in the figure enclosed with our April 18, 2006 letter is reasonable; however, the proposed expansion shown in Figure 1 of the report should be adequate in the short term. We intend to respond to this issue in more detail after we review the capture zone analysis that PLS intends to submit on July 17, 2006, and the additional data that has or will be collected this month.

Wagner Road Wells

We received a copy of the Abandoned Well Plugging Records for the wells at 597, 609, and 679 South Wagner Road on July 14, 2006, confirming that these wells have been plugged. The well at 603 South Wagner Road must also be plugged and the well plugging record provided in the next report. The last item in the table on page 6 of the report indicates that the homes at 685 and 697 South Wagner Road share a well. This does not correspond to information previously submitted. PLS had indicated in its February 28, 2006 report that the owner of each property was reviewing a contract for replacement of water. Please inform us of the status of PLS's effort to comply with the requirements of the May 17, 2005 Court Order (Order). If PLS and the property owners are not able to reach an agreement by November 1, 2006 on the terms under which PLS will provide a connection to the city water supply, PLS should seek involvement from the court to resolve this matter.

Task 2

The map provided to show the locations of the subdivisions (Figure 2) is helpful, but not detailed enough. The map needs to clearly show which existing parcels within the PZ are, or are not, covered by the subdivision plats reviewed. This figure should be revised using the PZ map that shows individual parcels with an overlay of the subdivision plats. Our review indicates that at least three areas, in addition to the homes on Penncraft Court, are not covered by the subdivision plats provided. Two of these appear to be Assessor's Plats No. 4 and No. 12. Another area along Newport Road does not appear to be part of a subdivision or plat. The homes in these areas must also be reviewed to determine if any of these homes need to be

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added to the survey. Please also provide an explanation in your next report of the basis for including subdivisions only to the west of the purple highlighted line on Figure 2.

#### Comments on Specific Addresses

Based on the information provided to date, we agree with the addresses listed on Tables 3 and 4, with the possible addition of addresses in the three areas discussed above. We note that PLS has provided well plugging records for three addresses listed in Table 3: 3409 Ferry, 205 South Wagner Road, and 351 South Wagner Road.

Please provide an update on the status and schedule for connecting 2340 Dexter to the city water supply and plugging the well. We note that a sample taken in June was non-detect for 1,4-dioxane. This well should be sampled again in September if this address has not yet been connected to the city water supply.

We agree to the exception request pursuant to paragraph 5(a) of the Order for the well at 3365 Jackson Road, with the understanding that this well is only accessible for water monitoring purposes. This well has been used for monitoring since 1988.

PLS has indicated it will submit use surveys for wells at 2801, 3050, and 3480 Jackson Road. Since your report, agreement has been reached to take the well at 3050 Jackson Road out of service, and that process is expected to be complete within a week. If PLS wants to use the well at 3050 Jackson Road as a monitoring location, we are willing to consider a request for an exception pursuant to paragraph 5(a) of the Order. In any case, this well should be sampled for 1,4-dioxane at least once before it is plugged.

We are also willing to consider requests for exceptions pursuant to paragraph 5(e) of the Order for the irrigation wells at 2801 Jackson Road and 960 Newport. Recent analytical data showing these wells to be non-detect for 1,4-dioxane will be required as part of the demonstration that these wells qualify for the exception.

Regarding the irrigation well at 3480 Jackson Road, we have informed PLS in letters dated January 10, 2006 and April 18, 2006, that this well must be plugged. Five samples taken from this well from July 2005 through January 2006 have each shown 1,4-dioxane at three parts per billion. We do not believe this well qualifies for an exception under the Order. PLS must take immediate steps to plug this well or initiate the dispute resolution process under the Consent Judgment. Until this issue is resolved, PLS must sample this well quarterly while it is in use, beginning within two weeks of your receipt of this letter.

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