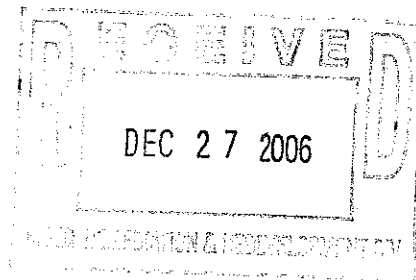


Life Sciences
600 South Wagner Road
Ann Arbor, MI 48103-9019 USA
734.665.0651 phone

December 21, 2006

Ms. Sybil Kolon
Environmental Quality Analyst
Department of Environmental Quality
Jackson State Office Building
301 E. Louis Glick Highway
Jackson, MI 49201-1556



Re: Maple Road Interim Response (MRIR)

Dear Ms. Kolon:

This letter is in response to your December 8, 2006 letter regarding the Michigan Department of Environmental Quality's (MDEQ) review of Pall Life Sciences' (PLS) Maple Road Interim Response (MRIR) Performance Monitoring Plan (dated February 3, 2006) and our July 17, 2006, Performance Review.

PLS has considered your request for three monitoring well nests on the east side of Maple Road, and the recommendation that PLS install additional upgradient monitoring nests. After reviewing the MDEQ's requests and recommendations, PLS is proposing an alternative. The main premise behind PLS' alternative approach is that existing data has not demonstrated that concentrations of 1,4-dioxane in excess of 2,800 micrograms per liter ($\mu\text{g/L}$) have reached the area of the MRIR. As such, wells positioned downgradient of this area are not necessary at this time.

It is PLS' position that operation of the MRIR is not necessary at this time to meet the conditions established by the December 17, 2004, Washtenaw County Court Decision Order regarding remediation of the Unit E contamination. At this time, PLS is operating the MRIR voluntarily, recognizing that there may be other benefits to reducing the mass of the plume.

From PLS' review of data from wells and borings in the MRIR area, it is questionable whether operation of the MRIR will ever be necessary to prevent 1,4-dioxane concentrations in excess of 2,800 $\mu\text{g/L}$ from migrating east of Maple Road. Monitoring data collected in the MRIR area have demonstrated that 1,4-dioxane concentrations have never exceeded 2,800 $\mu\text{g/L}$ at borings or monitoring well locations east of MW-72d. The highest concentration of 1,4-dioxane detected to date was 2,437 $\mu\text{g/L}$ from MW-85 (July 17, 2006). 1,4-Dioxane concentrations at MW-72d had also been fairly stable (between 3,000 and 3,500 $\mu\text{g/L}$) since April 2003. Without an increasing trend upgradient of the MRIR, there is less potential that 1,4-dioxane in the MRIR area will increase above current levels.

PLS agrees with the MDEQ that there are gaps in the current monitoring system that create uncertainties regarding the distribution of 1,4-dioxane in some important upgradient areas. It is the position of PLS that collection of data in these areas is more appropriate, at this time, than installing wells downgradient (east) of Maple Road. Such data will also be useful to better understand the capture zone of the MRIR. Based on the findings from further upgradient investigations, PLS and the MDEQ can determine whether additional downgradient wells are necessary to demonstrate compliance with the court order. If downgradient wells are necessary, the upgradient work will be valuable in selecting the most appropriate monitoring locations.

Enclosed is a map showing PLS' proposed monitoring locations. Supporting information regarding the proposed locations is provided below:

Location A – This location is being proposed to fill the gap between the MW-87 and MW-85 areas. This location will also provide water-level data that is important to further understanding the TW-19 capture zone. 1,4-Dioxane levels in groundwater sampled from the MW-87 cluster and neighboring wells, Maple Village East, and MW-85 have been below the 2,800 µg/L concentration. If 1,4-dioxane concentrations at this location are below 2,800 µg/L, it will be strong support that 1,4-dioxane in a concentration above 2,800 µg/L has not migrated south of TW-19.

Location B – This location is in or along the northern extent of the TW-19 capture zone. The purpose of this location is to fill a gap north of the Maple Village West boring. This location will also provide an indication of the levels of 1,4-dioxane that can either migrate north of the TW-19 capture and north of the hydraulic mounding associated with IW-4, or migrate east-southeast toward TW-19. If data from this boring indicates 1,4-dioxane at this location is below 2,800 µg/L, PLS will install a well (or well nest) and continue to monitor the location. If 1,4-dioxane concentrations are above 2,800 µg/L, PLS will move to Locations C and D (or another location) until the extent of the 2,800 µg/L concentration is defined.

This proposal should not be construed as a waiver of any rights PLS has to dispute or otherwise object to the MDEQ's request that PLS install the additional monitoring wells at the locations described in your December 8, 2006 correspondence.

Please contact me at your convenience to discuss this alternative proposal.

Sincerely,



Farsad Fotouhi
Corporate Vice President
Environmental Engineering

cc: Ms. Celeste Gill, AAG
Alan Wasserman, Esq.
Michael Caldwell, Esq.

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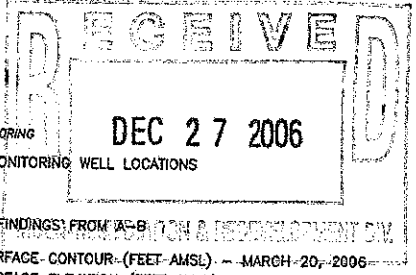
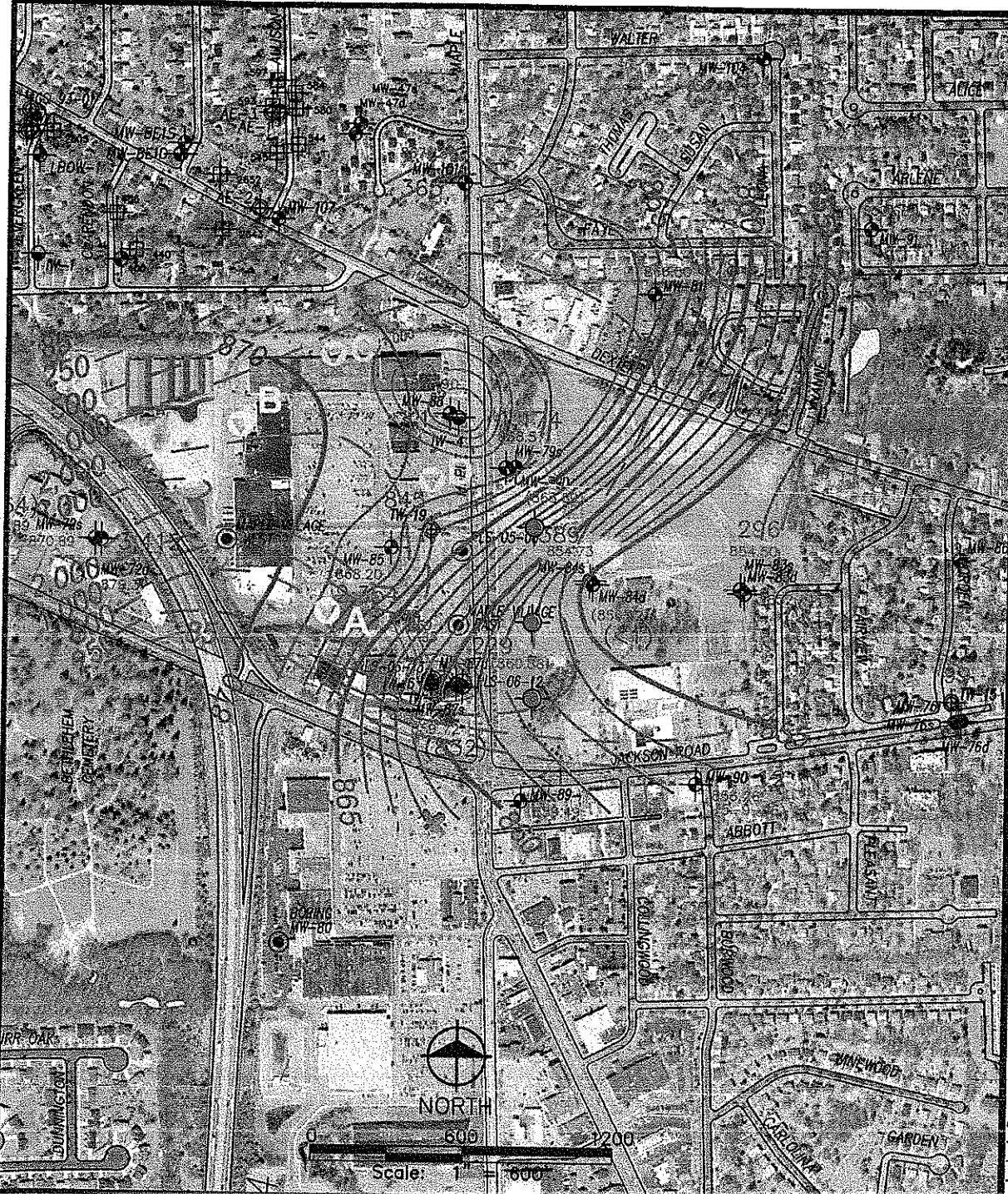
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engineers
 scientists
 architects
 constructors

Pall Life Sciences
 Scio Twp., Washtenaw County, Michigan
 Maple Road Interim Response



- LEGEND**
- - MONITOR WELL
 - ⊕ - RESIDENTIAL WELL
 - ⊖ - PURGE WELL
 - ⊙ - HYDROGEOLOGIC TEST BORING
 - ⊗ - MDEQ PROPOSED MONITORING WELL LOCATIONS
 - - A-B
 - - C-D - BASED ON FINDINGS FROM A-B

- ~ - POTENTIOMETRIC SURFACE CONTOUR - (FEET AMSL) - MARCH-20, 2006
- 870.02 - POTENTIOMETRIC SURFACE ELEVATION (FEET AMSL)
- (880.89) - DATA NOT USED
- ~ - UNIT E 1,4-DIOXANE ISOCONCENTRATION CONTOUR (ug/L) - APRIL-AUGUST 2006
- 1,437 - 1,4-DIOXANE CONCENTRATION (ug/L)
- (184) - DATA NOT USED

**PROPOSED
 BORING/MONITORING
 WELL LOCATIONS**

PROJECT NO.
 F96502
 FIGURE NO.