

February 21, 2007

Ms. Debora Snell
Surface Water Quality Division
Michigan Department of Environmental Quality
Jackson District Office
301 Louis Glick Highway
Jackson, Michigan 49201-1556

RECEIVED

FEB 22 2007

MDEQ - RRD
JACKSON DISTRICT OFFICE

Re: Compliance Evaluation Inspection
National Pollutant Discharge Elimination System (NPDES)
Permit No. MI0048453

Dear Ms. Snell:

Pall Life Sciences (PLS) is in receipt of your letter of February 7, 2007 and provides the responses below. Portions of your comments are included in bold to facilitate review.

MDEQ: 1. As noted above, hydrogen peroxide violations occurred on June 6, 2005, April 17, 2006, and January 15, 2007. Each of these events was discovered on a Monday morning and each event involved a power outage/surge, which in turn caused a problem with the sodium bisulfite feed. This issue was previously brought to your attention in DEQ correspondence dated September 7, 2005. Based on the information submitted in response to these exceedances, it appears the alarm/autodialer system was unable to notify the operator of the power outage and/or faulty valve and the problem was not discovered until Monday morning. Please determine what measures can be put in place to prevent this problem from recurring and provide a timeframe for completion of any necessary modifications to the recurring and provide a timeframe for completion of any necessary modifications to the system.

PLS Response: The issue on June 6, 2005 was actually a broken valve caused by the power surge, not the fluctuation of the sodium bisulfite feed. Fluctuation in the bisulfite pump is caused by DTE power surges, which would upset the processor and/or the sensitive calibration of the pump.

In general, a flow sensor is located just above the pump. This monitors the flow pumped through the bisulfite system. Variations in this flow are constantly monitored electronically through the sensor. If the flow exceeds the lower or upper limit of the set points, the flow will cease and the system will shut down. Minor fluctuations within the parameters of the set points will not cause a shut down or alarm. The pump vendor has been contacted to see if there is a way to remedy this situation. Unfortunately, the nature of the operation of pumps (pulsating) precludes any concrete solutions to this problem. However, PLS will attempt to tighten the sensitivity range of the flow sensor to see if this will assist, without causing unnecessary shutdowns.

MDEQ: 2. A review of DMRs indicates that the April 17, 2006, hydrogen peroxide violation was not reported on the April 2006 DMR (see enclosed documentation). Please submit an amended April 2006 electronic monthly DMR and an amended daily outfall table (Table No. 19).

PLS Response: The amended April 2006 DMR was submitted electronically on February 20, 2007 and an updated Table No. 19 is attached to this response.

MDEQ: 3. Since February 2006, Pall has been submitting monthly DMRs electronically, with daily outfall data submitted in hard copy form via standard mail. Pall is encouraged to submit daily outfall data electronically as well. By doing so, this will help ensure a complete discharge record in the DMR database and also helps prevent data entry errors.

PLS Response: PLS will change its reporting format to meet the new MDEQ request.

MDEQ: Pall O & M Manual is good overall. I have just a few minor comments. Please address the following in your next O & M Manual edition:

Please be sure to update references to Green Pond in Procedure Nos. 19 and 22 (Appendix C). Also update your Water Quality Manager email address in Procedure No. 22.

PLS Response: PLS will make these changes in the next edition.

Please include a copy of Method 317 in Appendix F.

PLS Response: PLS will include this in the next edition.

Please update the piping schematic in Appendix D to reflect the changes in the Green Pond piping configuration.

PLS Response: PLS had already made these changes.

I recommend adding a section on staffing requirements and operator qualifications.

PLS Response: PLS is unsure if this is required with other O & M Plans prepared in the State. As you know, our operators are all state certified.

Sincerely,



Farsad Fotouhi
Vice President
Corporate Environmental Engineering

cc: Ms. Sybil Kolon, MDEQ