



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

February 7, 2007

Mr. Farsad Fotouhi, Corporate Vice President
Environmental Engineering
Pall Life Sciences
600 South Wagner Road
Ann Arbor, Michigan 48103-9019

Dear Mr. Fotouhi:

SUBJECT: Compliance Evaluation Inspection
Pall Life Sciences
NPDES Permit No. MI0048453

Staff of the Department of Environmental Quality (DEQ), Water Bureau, conducted a Compliance Evaluation Inspection at the Pall Life Sciences (Pall) facility on September 20, 2006. The inspection was conducted to assess your facility's compliance with National Pollutant Discharge Elimination System (NPDES) Permit No. MI0048453. I would like to thank you and your staff for your time during the inspection.

At the time of inspection, the ozone treatment system was operating normally and the facility appeared well-operated and maintained. The system has four ozone treatment units (three in operation and one on stand-by) with a capacity to treat 1.872 million gallons per day of contaminated groundwater. The treatment system is staffed with three full-time operators, and an autodialer system notifies the operators of problems after hours. It was noted that the old ultraviolet treatment system has been completely disconnected as a backup treatment system, although the equipment is still housed onsite. Laboratory records are well-maintained, and laboratory quality assurance/quality control measures are in place. A review of discharge monitoring reports (DMRs) for the past several months indicates good compliance with NPDES effluent limitations overall. Three hydrogen peroxide violations were noted since June 2005 (i.e. June 6, 2005; April 17, 2006; and January 15, 2007) which were due to power outages/surges and subsequent problems with the sodium bisulfite feed.

Comments regarding Pall's Operation and Maintenance (O & M) Manual, originally submitted January 31, 2006, with subsequent updates throughout 2006, are also included as part of this inspection transmittal.

As a result of this inspection and file review, please address the following items:

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

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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 system.

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).
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.

O & M Manual Comments:

Pall's 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.
- Please include a copy of Method 317 in Appendix F.
- Please update the piping schematic in Appendix D to reflect changes in the Green Pond piping configuration.
- I recommend adding a section on staffing requirements and operator qualifications.

Please submit your written response to the items and comments listed above by March 12, 2007. Should you have any questions or concerns, feel free to contact me.

Sincerely,

Debora Snell
Environmental Quality Analyst
Water Bureau
517-780-7929

DS/CH
Enclosure

cc: Ms. Sybil Kolon, Remediation and Redevelopment Division, DEQ-Jackson District Office
File: Pall Life Sciences, MI0048453, Correspondence, Washtenaw County