

November 3, 2010

Sybil Kolon
Senior Environmental Quality Analyst
Remediation Division
Department of Natural Resources and Environment
301 E. Louis Glick Hwy.
Jackson, MI 49201

RE: Proposal to Reduce Batch Purging from the Ann Arbor Supply Well

Dear Ms. Kolon:

Pall Life Sciences (PLS) is proposing that the batch purging from the Ann Arbor Supply Well be temporarily reduced from its current monthly frequency to a quarterly frequency. The reasons for this request are provided below.

1. There is only one well (the Ann Arbor Supply [extraction] Well) in the Western System that is near the MDNRE Drinking Water Criterion (85 ug/L). 1,4-Dioxane concentrations in all monitoring wells in the Western System have been below 85 ug/L for a considerable time. The most recent groundwater sample from the Ann Arbor Supply Well had a 1,4-dioxane concentration of 83 ug/L (September 13, 2010). 1,4-Dioxane trends in this well and MW-53i remain downward (see attached graphs). Given the current levels of 1,4-dioxane and the historic trends at this location, reducing the batch purging at this time is appropriate.
2. No matter what the frequency is, batch purging is disruptive to the neighbors. Lowering the frequency will lower the disruption. Additionally, lowering the batch purging frequency reduces the potential for a transportation-accident related to this process.
3. Recent drilling by PLS in the area of Eagle Point strongly suggests there is no relationship between 1,4-dioxane in the Western System and other plumes west of Wagner Road.
4. Batch purging appears to have been valuable in reducing 1,4-dioxane levels in groundwater sampled from the Ann Arbor Supply Well and MW-53i, although there remains a weak correlation between the purging and 1,4-dioxane trends. Changing the frequency will provide

insight into how the 1,4-dioxane trends at this location respond under new conditions, and whether the objective of reducing 1,4-dioxane concentrations can be made with less disruption to the area/neighbors.

PLS proposes to reduce purging from monthly to quarterly for one year. PLS will extract the same volume of groundwater (approximately 36,000 gallons) during these events. 1,4-Dioxane trends will be monitored in the Ann Arbor Supply Well and MW-53 during each event. If after a year from the frequency adjustment there is an indication of increasing 1,4-dioxane concentrations at either well that can be correlated to the frequency change, and 1,4-dioxane concentrations in one of the wells is above 85 ug/L, PLS will either return to a monthly frequency, or propose an alternate frequency (less than quarterly) and commit to additional monitoring. Alternatively, if after a year, there is an indication that there are decreasing 1,4-dioxane concentrations at either well that can be correlated to the frequency change, PLS will likely propose a further reduction in the batch purging frequency.

We would like to implement this proposal immediately, especially considering the fast approaching winter driving conditions. We would appreciate your feedback on this proposal at your earliest convenience.

Sincerely,



Farsad Fotouhi
Vice President
Corporate Environmental Engineering

cc: Celeste Gill, MDAG
Michael Caldwell

Trend Analysis

