STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

October 21, 2013

VIA E-MAIL and U.S. MAIL

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

Mr. Michael L. Caldwell
Zausmer, Kaufman, August & Caldwell, P.C.
31700 Middlebelt Road
Suite 150
Farmington Hills, Michigan 48334-2301

Dear Sirs:

SUBJECT: Gelman Sciences, Inc. Remedial Action
Analysis of 1,4-Dioxane Trends at MW-103, May 22, 2013

The Department of Environmental Quality (DEQ) has completed its review of the above referenced report from Pall Life Sciences, Inc. (PLS), which was submitted in response to the DEQ's request at the February 20, 2013, meeting with PLS. Please see the enclosed Interoffice Communication from Mr. Jim Coger, dated October 17, 2013, for detailed comments on the report.

As discussed in the enclosed Interoffice Communication and at the February and July 2013 meetings between the DEQ and PLS, the DEQ continues to have concerns regarding the ability of the existing monitoring well network to determine if the existing Prohibition Zone (PZ) boundary south of MW-103s is protective, due to concentrations of 1,4-dioxane that have been found in MW-103s. Although MW-103s has been below 85 parts per billion (ppb) since April of 2013, it is possible concentrations will increase in the future. Therefore, some further action is warranted to ensure protection of public health and safety.

To assist PLS and the DEQ in monitoring changes in the groundwater contamination in this area, the sampling frequency of the following monitoring wells must be increased to monthly: MW-76s, MW-76i, MW-103s, MW-112s and MW-112i. This is an increase in frequency of sampling for most of these monitoring wells.

The DEQ will also require PLS to submit its conceptual site model (CSM) for the MW-103 vicinity by December 20, 2013. If PLS's CSM determines that the concentration of 1,4-dioxane in MW-103s will likely exceed 85 ppb in the near future, PLS must prepare and submit a contingency plan by February 17, 2014. The contingency plan must outline how PLS proposes to address the possible migration of 1,4-dioxane outside of the PZ.

PLS must notify the DEQ within five business days of obtaining the results of any sample from MW-103s that exceeds 85 ppb of 1,4-dioxane. The DEQ will arrange with PLS to collect a split sample from MW-103s at the next monthly sampling event. If the results of one of the split samples detects 1,4-dioxane above 85 ppb, PLS must prepare and submit a contingency plan to the DEQ within 60 days of receiving the results if it has not already begun preparation of a contingency plan as discussed above.

Please note the requirement to notify the DEQ of a sampling result from MW-103s that exceeds 85 ppb of 1,4-dioxane will continue if the initial split sample results are both less than 85 ppb of 1,4-dioxane. In addition, the requirement to submit a contingency plan will be triggered when 1,4-dioxane above 85 ppb is detected in MW-103s for two consecutive months of sampling, even if future results decrease.

Should you require further information, please contact me at 517-780-7937; kolons@michigan.gov; or the DEQ Jackson District Office, 301 East Louis Glick Highway, Jackson, Michigan 49201.

Sincerely,

Sybil Kolon
Senior Environmental Quality Analyst
Gelman Sciences Project Coordinator
Remediation and Redevelopment Division

SK/JA

Enclosure
cc: Ms. Celeste Gill, Department of Attorney General
Mr. Mitchell Adelman, DEQ/Gelman File
Mr. Jim Coger, DEQ