STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

April 17, 2014

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 Mr. Fotouhi and Mr. Caldwell:

SUBJECT: Gelman Sciences, Inc. Remedial Action
Conceptual Site Model, MW-103, January 30, 2014

The Department of Environmental Quality (DEQ) has completed its review of the above referenced Conceptual Site Model (CSM) from Pall Life Sciences, Inc. (PLS), which was submitted in response to the DEQ's request in a letter dated October 21, 2013. The DEQ granted PLS's request for an extension of time to submit the CSM until the end of January 2014. Please see the enclosed Interoffice Communication from Mr. Jim Coger, dated April 17, 2014, for detailed comments on the CSM.

As discussed in the enclosed Interoffice Communication, 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, PLS should be prepared to address the possibility that concentrations will increase in the future.

The CSM suggests that the plume (groundwater contamination greater than 85 ppb) near MW-103s will not migrate beyond the nearby southern PZ boundary and that the MW-112 well cluster is adequate to monitor for that possibility. As discussed in Mr. Coger's Interoffice Communication, the DEQ does not agree that the MW-112 well cluster is adequate to monitor the plume at the southern PZ boundary in the event that concentrations at MW-103s exceed 85 ppb.

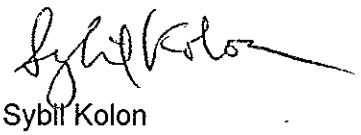
As discussed in our October 21, 2013, letter, PLS must notify the DEQ within five business days of obtaining the results of any sample from MW-103s that exceeds 85 ppb of 1,4-dioxane. The DEQ will then arrange with PLS to collect a split sample from MW-103s at the next monthly sampling event. The DEQ will also notify PLS within five business days of receiving results of any sample from MW-103s that exceeds 85 ppb of 1,4-dioxane.

If 1,4-dioxane above 85 ppb is detected by any laboratory for two consecutive months, PLS must prepare and submit a contingency plan to the DEQ within 60 days of receiving the result from the second consecutive monthly sample above 85 ppb. The contingency plan must outline how PLS proposes to address the possible migration of 1,4-dioxane outside of the PZ to ensure protection of public health and safety. Any contingency plan that includes monitoring the existing PZ boundary in the absence of any active response actions to prevent expansion of groundwater contamination above 85 ppb outside of the PZ must include additional monitoring wells. If concentrations continue to increase, appropriate response activities, subject to DEQ review and approval, must be implemented.

The DEQ believes it is appropriate to address any disagreements or disputes regarding content at the time the contingency plan is submitted (within 60 days of receiving the second consecutive monthly sample above 85 ppb).

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
Jackson District Office

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