

WORK PLAN
EXPANDED PROHIBITION ZONE
WELL IDENTIFICATION

PREPARED ON BEHALF OF:
GELMAN SCIENCE INC.

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Project No. 806500



TABLE OF CONTENTS

SECTION	PAGE
WORK PLAN	1
ATTACHEMENT 1	
Survey Letter	
Survey	

EXPANDED PROHIBITION ZONE WELL IDENTIFICATION WORK PLAN

This Work Plan will summarize the procedures Gelman Sciences Inc. (“Gelman”) will follow in order to identify the presence of private water wells located within the area that will be included in the Prohibition Zone if the proposed expansion is approved. This Work Plan is intended to satisfy the requirements of Section V.A.2.h of the Fourth Amended and Restated Consent Judgment (“4th Amended CJ”) incorporated by reference by the Court’s June 1, 2021 “Order to Conduct Response Activities to Implement and Comply with Revised Cleanup Criteria” (the “Response Activity Order”). Gelman has already conducted an initial screening of the Expanded Area and it appears that each property within the Expanded Area is serviced by City of Ann Arbor municipal water. Gelman will perform the additional tasks described below in order to ensure that no water supply wells are in use in the expanded area:

1. Gelman has published an EGLE-approved Legal Notice of the expansion of the Prohibition Zone in a manner consistent with the procedures followed when the Prohibition Zone was established. Gelman will provide a copy of the Court’s Response Activity Order incorporating the new boundaries set forth in the 4th Amended CJ, Attachment E to the 4th Amended CJ (consisting of a list of the prohibitions on groundwater use/exceptions, and a map depicting the expanded Prohibition Zone) to the relevant municipal offices.
2. Gelman will review available governmental records/databases to confirm that each property within the Expanded Area is serviced by City of Ann Arbor municipal water and that there are no records indicating the presence of any water supply wells on any of the properties.
3. Gelman will utilize the previously agreed upon methodology to determine if properties within the Expanded Area were developed: a) within the City limits; b) at locations where City water was available; and c) at a time when connection to City water was legally required. For all such properties that meet all of these conditions, no further action will be required.
4. With regard to any properties located within the Expanded Area that were developed at a time when connection to City water was not required/available, Gelman will review available governmental records/databases to locate any well plugging/abandonment records for the properties. For properties where such records indicate that the previously installed well(s) were properly abandoned, no further action will be required.

5. With regard to properties developed when connection to City water was not required and where well abandonment records are not available, Gelman will mail the attached survey and cover letter to the property owner and (if different than the owner) the resident of the properties. Consistent with past procedures, a copy of Attachment E to the 4th Amended CJ, consisting of the list of prohibitions/exceptions and a map of the expanded Prohibition Zone will be included with the survey. The cover letter will also include Gelman's request for permission to inspect the exterior of the property for wells.
6. Subject to being granted access, Gelman will contract with a licensed well contractor to plug any wells on these properties, if applicable, unless they continue to be part of Gelman's approved monitoring plan or unless one of the exceptions listed subsection V.A.2.d of the 4th Amended CJ applies. For each property that is confirmed to be using a private drinking water well for drinking water purposes, Gelman will provide a connection to municipal water and properly abandon the old well. For each private non-drinking water well that is identified by the above-described procedures, Gelman will properly abandon the well unless one of the exceptions applies. Prior to abandoning/plugging of any well, Gelman will attempt to obtain a groundwater sample from the well for analysis, unless a recent (within 6 months) sample result from the well in question is available.
7. At the conclusion of this effort, Gelman will provide the EGLE with the following:
 - a. Plat maps identifying the subdivisions that were determined not to be vulnerable because they were developed at a time when connection to City water was legally required;
 - b. Copies of any well plugging abandonment records relied upon by Gelman to exclude otherwise, vulnerable properties from the survey requirement;
 - c. A detailed explanation of how Gelman determined which properties are vulnerable and need to be surveyed;
 - d. Proof that the survey documentation was served on the relevant owners/residents and copies of any surveys that are returned;
 - e. Copies of any written responses to the Legal Notice that Gelman receives;
 - f. The results of any samples obtained from the wells that Gelman identifies;
 - g. A spreadsheet that summarizes the disposition of the properties not included in the plat maps provided in 7.a., including the basis for not surveying any of those properties (if any);
 - h. A short narrative report summarizing the results of Gelman's investigation.

Gelman will complete the well identification work plan within 180 days of EGLE's approval of this work plan, excluding any potential connection to municipal water, which will be subject to City approvals (this contingency is extremely unlikely because Gelman's initial review has already confirmed that all properties within the Expanded Area are connected to municipal water), and will submit a report on the work within 60 days of completion of the work plan, subject to the need for any extension for unanticipated delays.

ATTACHMENT 1

SURVEY LETTER AND SURVEY

Dear Owner:

I am writing to you on behalf of Gelman Sciences Inc. ("Gelman") to ask you to complete the enclosed survey. Gelman is seeking this information in connection with changes to its groundwater cleanup program recently ordered by the Washtenaw County Circuit Court (the "Court") Judge who is supervising Gelman's cleanup efforts.

As you may know, in May 2005, the Court issued an order establishing an area within the City of Ann Arbor where it is illegal to withdraw or otherwise use the groundwater, referred to as the "Prohibition Zone". Recently, the Court approved an expansion of the Prohibition Zone as part of Court-ordered modifications to the cleanup program to address new cleanup criteria. Details on these changes are available on the web site maintained by the Michigan Department of Environment, Great Lakes and Energy ("EGLE") for the Gelman Sciences site (https://www.michigan.gov/egle/0,9429,7-135-3311_4109_9846-71595--,00.html).

A copy of the restrictions on groundwater use within the Prohibition Zone, including the expanded area is attached. Also attached is a separate figure showing the area covered by the expanded Prohibition Zone. Your property is located within the expanded Prohibition Zone. Like all of the properties in the Prohibition Zone, your property is supplied with City water drawn from a safe source. Because the Prohibition Zone is broad enough to include a significant buffer zone, the fact that your property is located within this zone does not mean that there is contaminated groundwater under your property. It does, however, mean that use of wells on your property to withdraw groundwater is, with limited exceptions, prohibited.

EGLE has asked Gelman to survey certain properties within the Prohibition Zone established by the Court's orders. We are being asked to identify any operational and non-operational groundwater wells within the newly expanded Prohibition Zone. This includes not only out-of-use drinking water wells, but also wells used for irrigation, heat pumps or other purposes. The properties like yours now being surveyed are those that may have been serviced by a private well before being connected to the City water supply. If you are unsure if a well is present on your property, Gelman requests the opportunity to inspect the exterior of your property to make the determination. It is important that any wells within the expanded Prohibition Zone be identified and properly abandoned to prevent future use.

Please return the attached survey form to Gelman in the self-addressed envelope provided. If you have any questions, please feel free to contact either Gelman or EGLE:

Dan Hamel
EGLE
301 E. Louis Glick Hwy.
Jackson, MI 49201
517-780-7937
HamelD@michigan.gov

Lawrence Gelb
Pall Life Sciences
642 S. Wagner Road
Ann Arbor, MI 48106

Thank you for your assistance with this important aspect of the cleanup project.

Lawrence Gelb

cc: resident if not the owner

Well Identification Survey
(Please complete both sides)

Property Address: _____

Property Owner Name: _____

Respondent is Owner: _____ YES _____ NO

Property Occupant Name: _____

How long have you lived here? _____

If you know, when was the house/building built? _____

If you know, was house/building hooked to city water when built? _____

Do you know of others who may have more information about wells at this address or others in the area? _____ If so, list name(s) and any contact information

To the best of your knowledge, are there any water supply wells on your property that are currently used for any of the following purposes:

- Drinking Water Supply
- Irrigation
- As part of a heat pump system
- Other

If you've checked any of the above boxes, please generally describe where each such well is located on the property and the frequency each well is used.

To the best of your knowledge, are there any water supply wells on your property that are no longer in use? _____ YES _____ NO

If so, please describe generally where each such well is located, whether it is still usable, and the last time the well was used.

For each out-of-service groundwater extraction well that is present on your property, please describe what steps, if any, were taken to abandon the well and provide copies of any documentation available, such as well abandonment logs.
