

**Executive Summary
Gelman Sciences, Inc. Unit E Aquifer
Groundwater Contamination
Decision Document**

Site Name and Location:

Gelman Sciences, Inc.
Scio Township
Washtenaw County
Site ID #: 81000018

Purpose:

This document is prepared in accordance with Section 20120d of Part 201 (Environmental Remediation) of the Natural Resources and Environmental Protection Act (NREPA) to provide a summary of the decision regarding cleanup of the Unit E aquifer groundwater contamination plume (Unit E Plume) plume, along with the reasons for the Department of Environmental Quality (DEQ) selecting a remedial action for the Unit E Plume at the Gelman Sciences, Incorporated site of environmental contamination (Gelman site.) This document is also prepared in response to the status conference in Washtenaw County Circuit Court on February 25, 2004, wherein the court ordered Pall Life Sciences, Inc. (PLS) to submit their comprehensive feasibility study (FS) by June 1, 2004, and the DEQ to respond to the FS by September 1, 2004. This document supplements previous remedial decisions for other contaminated groundwater units that are embodied in the October 1992 Consent Judgment (File No. 88-34734-CE), and subsequent Remediation and Enforcement Order dated July 17, 2000.

Basis:

The decision outlined in this document is based upon the Administrative Record developed by the DEQ.

Summary:

The Gelman site is comprised of the PLS plant property located on Wagner Road just south of Jackson Road in Scio Township, and extends eastward and north-eastward into the City of Ann Arbor, and westward and north-westward in Scio Township. From 1966, to 1986, PLS used 1,4-dioxane in the manufacture of medical filters. Various methods of disposal and waste handling during this period resulted in widespread groundwater contamination. Three major aquifers were identified and designated as the Unit C₃ (includes the Core Area), Unit D₀ (includes the Western System), and Unit D₂ (includes the Evergreen System) aquifers. PLS began groundwater remediation efforts to address these aquifers in 1997. In May of 2001 the deeper, Unit E Aquifer, was also discovered to be contaminated. Since the contamination in the Unit E aquifer was discovered, 30 monitoring wells have been installed to determine the nature and extent of contamination. In May 2003, PLS and DEQ agreed that PLS should develop a FS to systematically evaluate remedial alternatives for the Unit E Plume.

The June 2004, FS examined remedial alternatives for addressing the entire Unit E Plume, and proposed PLS's remedial alternative. The DEQ reviewed PLS's FS and

preliminarily concluded that PLS's proposed alternative could not be approved as presented. On July 7, 2004, the DEQ preliminarily identified a remedial alternative consistent with Part 201, and solicited public comment.

Upon considering public comments received during the public comment period, the DEQ makes the following decision regarding the Unit E plume:

In order to address the elements required for remedial actions under Part 201, the DEQ has determined that extracting and treating contaminated groundwater in the vicinity of Wagner Road and Maple Road, coupled with capture of the "leading edge" of contamination is necessary to comply with Part 201, and the Consent Judgment. The performance objectives for the groundwater extraction in the vicinity of Maple Road, the vicinity of Wagner Road, and for the leading edge are that, once initiated, a hydraulic barrier should be created to halt the further migration of concentrations of 1,4-dioxane above 85 ppb in the downgradient or easterly direction.

The DEQ believes there may an opportunity for PLS to satisfy the conditions set forth on pages 15 and 16 of the attached detailed Decision Document, and that, if those conditions can be satisfied, capturing the leading edge of the plume would not be necessary to satisfy Part 201 criteria. PLS has indicated to the DEQ that it may be able to satisfy those conditions within one year. Thus the DEQ has outlined in this Decision Document parallel pathways PLS can take to explore their ability to satisfy the necessary conditions that would allow the leading edge of the Unit E Plume to lawfully migrate untreated, while concurrently moving forward with the necessary steps to expeditiously perform interim response actions and enable timely treatment at the leading edge, if that is necessary.

Statutory Determinations:

This DEQ Decision is protective of public health, safety, and welfare, and the environment. The Decision provides for removal of hazardous substances from the Unit E Plume until Generic Residential Cleanup Criteria protective for drinking water are met. Alternatively, this Decision provides for complying with other provisions of Part 201 and the Consent Judgment.

Andrew W. Hogarth, Chief
Remediation and Redevelopment Division

Date

Attachment