



Gelman Plume & 1,4-Dioxane Quarterly Update

July - September 2023

EPA Updates

A community forum hosted by Congresswoman Debbie Dingell to address the Gelman dioxane plume took place on June 28, 2023. Congresswoman Dingell invited representatives from the Environmental Protection Agency (EPA), EGLE, and the Michigan Attorney General's Office. Also present were numerous Washtenaw County, City of Ann Arbor, Scio Township and Ann Arbor Township elected officials and personnel. EPA and EGLE personnel provided updates and community members asked questions. A recording of the event is available on Congresswoman Dingell's Facebook page of recorded events: <https://www.facebook.com/RepDebbieDingell>

The EPA Superfund Branch Chief, Tim Fischer, provided updates on the EPA Superfund Site Assessment Process. Nuria Muniz, EPA National Priority Listing (NPL) Coordinator for Region 5, presented at the CARD meeting on June 6, 2023. Information from both of these meetings is presented below.

- The Site Inspection (SI) Report, for the sampling activities completed by EPA in 2022 is in progress.
- The purpose of the SI is to evaluate if a site is eligible as an NPL candidate.
- Another groundwater sampling event will occur for the wells surrounding the Gelman property. These will be incorporated into the SI Report document to build a robust administrative record to support the decision to move forward with NPL or not.
- Preliminary data indicates that the site could potentially qualify as an NPL site. However, the decision is subject to EPA headquarter and Administrator review, as well as agreement from EGLE.
- Listing a site for NPL requires a federal rulemaking process. There is a 60-day public comment period. The time between the proposed and final ruling is approximately six months to answer questions. At the end of that timeframe, the score will determine if the site can be listed.

- If the site is listed, EPA would be the lead enforcement agency on the site but would work closely with EGLE.
- If EPA is the lead enforcement agency, delineation will be the focus.
- If the site is listed, EPA would embark on a thorough feasibility study and remedial investigation to address the concerns at the site. This is typically 4-6 years before a remedy or remedies are selected.

EPA updates regarding the Gelman site can now be found on the EPA's website at: <https://www.epa.gov/mi/gelman-sciences> and the 'frequently asked questions' for the Gelman site is: <https://www.epa.gov/mi/gelman-science-frequently-asked-questions-0>



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Sentinel Well Installation

In November 2022, the city installed two sentinel monitoring wells. Sampling was completed at these wells in May and August 2023 for 1,4-dioxane using Method 522 analysis. There were no detections in either well. An aquifer analysis is also in progress to determine the hydraulic conductivity of the two aquifers.

Agency Updates

MS4 Permit

Concentrations of 1,4-dioxane have been entering the Allen Creek Drain (ACD) stormwater system. The ACD system is part of Washtenaw County's Municipal Separate Storm Sewer System (MS4). On December 15, 2022, the Washtenaw County Water Resources Commission Office sent a letter to Gelman indicating that action was required to remain in compliance with the County's MS4 permit requirements regarding outstanding issues previously noted. The letter stated that the migration of 1,4-dioxane into ACD must cease or be in compliance with applicable State and County statutes and requirements.

NPDES Permit

- EGLE is reviewing the National Pollutant Discharge Elimination System (NPDES) permit application that was submitted for Gelman's current system on April 4, 2019.
- EGLE is nearing completion of the permit review. Once the review is complete, draft comments will be provided to Gelman. After Gelman's review the proposed permit will be made available for public review and EGLE will hold a public hearing on the permit application.

EGLE / CARD

- CARD meetings were held virtually on August 1 and September 5, 2023.
- EGLE provided the following updates:
 - Chris Svoboda is the new interim Gelman EGLE project manager.
 - The 4th Amended Consent Judgement was signed on May 17, 2023.
 - As part of this, additional extraction will take place in the rose well remediation area. EGLE and Gelman personnel met regarding implementing this.
 - Two additional monitoring wells are being installed in the western plume. A western monitoring plan is currently being drafted and will be submitted to EGLE for review.
 - Gelman is revising the GSI work plan for Allen Creek to make sure it covers all required components of the 4th Amended Consent Judgement.
 - EGLE had a 30-day public comment period for Gelman's revised Eastern Area Monitoring Plan.
- Washtenaw County Health Department and EGLE completed residential well sampling this summer. A total of 202 residential wells were sampled. Samples were submitted to the EGLE laboratory for analysis using method 8260 with 0.5 parts per billion (ppb) reporting limit. Results were sent to homeowners and will be added to the EGLE database.
- Ann Arbor Township completed residential sampling in August at 16 residences. Results were non-detect for all residences sampled.
- The next scheduled meeting will be held on October 3, 2023, at 6 pm via Zoom.

Pall Groundwater Treatment Updates

Total Volume of Groundwater Treated June 2023 through August 2023

70,430,385 gallons

Mass of 1,4 Dioxane Removed

June: 85.73 pounds

July: 80.31 pounds

August: 74.19 pounds

Total: 240.23 pounds

The mass calculations were determined from the NPDES monthly discharge reports using the maximum daily influent concentration and maximum daily effluent concentrations.

The volume was calculated from the average monthly flows in the monthly discharge report.

The next Quarterly Report will be distributed in January 2024 and will include:

- EGLE and CARD Updates
- MS4 Permit
- NPDES Permitting Progress
- Sentinel Well Monitoring