



Gelman Plume & 1,4-Dioxane Quarterly Update

September 2023 - January 2024

EPA Updates

On December 12, 2023, Michigan Governor Gretchen Whitmer signed a letter of concurrence transferring clean-up management of the Gelman Sciences contaminated groundwater plume from Michigan Environment, Great Lakes, and Energy (EGLE) to the U.S. Environmental Protection Agency (EPA). Groundwater under more than three square miles of Ann Arbor and Scio Township is contaminated with industrial solvent 1,4-dioxane resulting from discharges from Gelman's manufacturing operations from the 1960s through the 1980s. The site has been [managed by EGLE](#) since the discovery of the contamination in 1985. Local officials and advocates asked that the site be included on the National Priorities List (Superfund) to bring more resources to bear on site monitoring and remediation.

In October 2023, the EPA published the [Final Site Inspection Report](#), which found 1,4-dioxane concentrations in monitoring wells exceeding three times the background concentrations and attributable to the Gelman Site. With the State of Michigan concurrence letter in-hand, the EPA's next step in the [listing process](#) will be to develop a Hazard Ranking System (HRS) Package, which is a robust data review and documentation of the scoring system used to assess the relative potential of sites that pose a threat to human health or the environment. Sites that score at or above an established level qualify for cleanup under the Superfund Program and are proposed for listing on the National Priorities List (NPL), a list of the most serious sites identified for long-term cleanup. With the completed HRS Package, the EPA will reveal the final HRS score for the Gelman site along with all the supporting documentation used to develop the score. The EPA will then publish the package and engage in a 60-day public comment period, after which it will

provide public responses to all comments. If, after the formal comment period, the site still qualifies for cleanup under Superfund, it is formally listed on the NPL.

After listing, further studies will ensue to determine the nature and extent of the contamination and to help identify potential treatment options.

EPA updates regarding the Gelman site are available online <https://www.epa.gov/mi/gelman-sciences> and frequently asked questions <https://www.epa.gov/mi/gelman-science-frequently-asked-questions-0>

Stateside Public Radio Interview: Gelman Plume

Listen to City of Ann Arbor's Public Services Administrator Brian Steglitz who was interviewed on the January 18 on Michigan Public Radio Stateside program. He and Professor Bill Schuster, Chair of the Department of Civil and Environmental Engineering at Wayne State, discussed the ongoing, toxic "Gelman Plume" underneath Ann Arbor. They shared its history, what's being done to clean it up, the importance of being placed on the Federal superfund list and how action must take place before the underground plume reaches the Huron River (Ann Arbor's main water source). Listen to the entire program [here](#).

Agency Updates

EGLE - NPDES PERMIT

- EGLE has produced a draft National Pollutant Discharge Elimination System (NPDES) permit for the application that was submitted for Gelman's current system on April 4, 2019.
- EGLE is accepting comments on the draft permit until February 23, 2024. The documents can be reviewed at [Public Notice - Documents - MiEnviro Portal \(michigan.gov\)](#)

EGLE / CARD

- CARD meetings were held virtually on October 3, November 7, December 5, 2023 and February 6, 2024.
- EGLE provided the following updates:
 - Two additional monitoring wells are being installed in the western plume.
 - EGLE is currently reviewing the Western Area GSI Work Plan.
 - EGLE is reviewing the work plan for downgradient and Allen Creek Drain GSI Investigations.
 - EGLE responded to Gelman's revised Eastern Area Monitoring Plan and is expecting a revised version of the plan soon.
- Washtenaw County Health Department will be determining residential well sampling locations in the coming weeks. Samples will be submitted to the EGLE laboratory for analysis using method 8260 with 0.5 parts per billion (ppb) reporting limit. Results will be sent to homeowners and will be added to the EGLE database.

- The next scheduled meeting will be held on Tuesday March 5, 2024, at 6 p.m. via Zoom.

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.

Pall Groundwater Treatment Updates

Total Volume of Groundwater Treated between September 2023 through December 2023:

105,858,640 gallons

Mass of 1,4 Dioxane Removed:

September: 85.02 lbs

October: 89.09 lbs

November: 85.20 lbs

December: 88.28 lbs

Total: 347.58 lbs

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.

Next Quarterly Report Due April 2024

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