



QUARTERLY
UPDATE

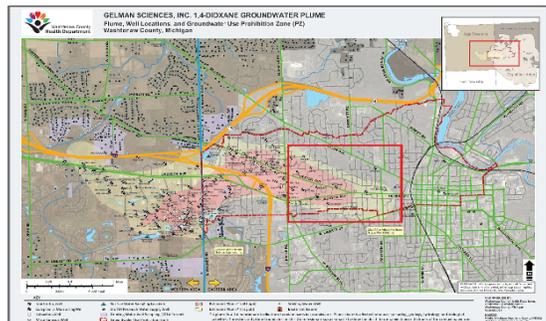
GELMAN PLUME *and*
1,4-Dioxane

Settlement Update

- Since the spring of 2017, a proposed fourth amendment to and restatement of the Consent Judgment has been under negotiation between Gelman, EGLE, the City of Ann Arbor, Washtenaw County and its Health Department, Scio Township and the Huron River Watershed Council (the intervenors).
- October 20, 2020 – During the Ann Arbor City Council Meeting City Council voted 7-4 to reject the settlement.
- By December 2020 – The intervenors have all voted in support of seeking EPA cleanup. The Governor was sent a letter formally requesting she ask EPA to intervene.
- A hearing was held on March 22 and Judge Connors denied Gelman’s motion to cancel upcoming hearings regarding the potential new cleanup protocol. Evidentiary hearings are scheduled for May 3rd - 5th for Gelman and the intervenors.
- A Community Information Session Meeting with EPA and EGLE was held on March 18.
 - o EPA personnel outlined the typical process and timelines for a Superfund site and indicated the historical information from the Gelman site could result in the lower end of typical timeline.
 - o Although the EPA Superfund process would not normally list a site already under state oversight, EPA personnel indicated the Gelman site is still a possibility.
 - o A request from the Governor is needed for EPA to proceed formally with determining if the Gelman site qualifies for the National Priorities List. The intervenors have already requested the Governor proceed with her formal request to EPA.
 - o The EPA confirmed actions through the State Court can continue in parallel with the 1,4-Dioxane Update Superfund process.
 - o The EPA has a ‘frequently asked questions’ for the Gelman site:
<https://www.epa.gov/mi/gelman-science-frequently-asked-questions-0>

Wet Basement Testing for 1,4-Dioxane Update

In September 2020, the City provided details of the wet basement testing for 1,4-dioxane in a presentation that served as the project kickoff. There were no basements sampled in the first quarter of 2021 and additional program details can be found on the City of Ann Arbor’s website:
<https://www.a2gov.org/departments/water-treatment/Pages/1,4-Dioxane-Wet-Basement-Testing-.aspx>



Agency Updates

MS4 PERMIT

- Concentrations of 1,4-dioxane entering the Allen Creek Drain stormwater system have increased since 2017 surrounding West Park area. One location in particular has increased from 4.4 ppb in 2017 to 49 ppb in sampling completed during the fall of 2020.
- Based on the increased concentrations of 1,4-dioxane into the Allen Creek Drain stormwater system, the WCWRC sent Gelman a 'corrective action required' notice to resolve this illicit discharge into the Allen Creek Drain. The Allen Creek Drain is part of the WCWRC MS4 permit.
- A meeting was coordinated between EGLE, WCWRC and Gelman representatives. Additional sampling in the Allen Creek Drain and in the shallow groundwater adjacent to the Drain was requested of Gelman. An update will be provided at the April 6th CARD meeting.

EGLE¹ / CARD

- A quarterly CARD meeting was held on March 2, 2021 virtually through Zoom. Additional personnel from EGLE were present for the quarterly meeting. Congresswoman Debbie Dingell also attended a portion of the meeting to announce a Gelman Community Information Session meeting on March 18, 2021 where EGLE and EPA personnel answer questions from local officials and the local communities.
- EGLE is continuing their review of the monitoring well trend analysis and are targeting the April CARD meeting for discussion.
- Compliance well replacement in the ScioView development are needed but EGLE is waiting on determination of the Fourth Consent Judgment to act.
- The next scheduled meeting is a CARD monthly meeting and will be held on April 6, 2021 at 6PM via zoom.

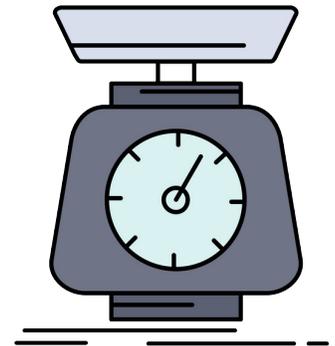
¹ Michigan Department of Environment, Great Lakes, and Energy

² National Pollutant Discharge Elimination System

Pall Groundwater Treatment Updates

Total Volume of Groundwater Treated January and February 2021

41,056,980 gallons



Mass of 1,4 Dioxane Removed

January: 62.56 lbs

February: 59.84 lbs

Total: 122.41 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.

NPDES² PERMIT

- EGLE is currently reviewing the NPDES permit application that was submitted on April 4, 2019.
- EGLE has 180 days after determining completeness of application to issue or deny. There has been no significant update on this.
- Public notice period is for 30 days and a public hearing can be requested.
- If a public hearing occurs it will add time to the schedule.
- At the 11/5/2019 CARD meeting a representative for State of Michigan's Permitting section addressed that the state is experiencing a severe backlog reviewing NPDES permits. Responsible parties are obligated to comply despite permit expiring in October 2019.

Next Quarterly Report Due July 2021

- Basement Sampling Update
- CARD Updates
- NPDES Permitting Progress
- Settlement Update