



Ann Arbor Water

Quarterly Update August – December 2024

EPA Updates

The Environmental Protection Agency (EPA) is still considering public comments on their proposal to include the Gelman site on the Superfund National Priorities List (NPL). The EPA will spend the next few months reviewing and responding to each comment. If, after the formal comment period, the site still qualifies for cleanup under Superfund, it is officially 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.

General EPA updates regarding the Gelman site can now be found on the EPA's [website](#) as well as [frequently asked questions](#).

Agency Updates

EGLE - NPDES PERMIT

- The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Water Resources Division (WRD) reissued the Gelman Sciences discharge permit (Permit No. MI0048453) on September 30, 2024.

Coalition for Action on Remediation of Dioxane (CARD)

- CARD meetings were held virtually on September 3, 2024, October 1, 2024, and December 3, 2024. The August and November meetings were canceled.
- EGLE update
 - EGLE completed their 2024 annual surface water quality sampling, and results will be publicly available within the next few weeks.
 - EGLE received Gelman's draft Eastern Area Groundwater Surface Water Interface (GSI) work plan on September 12, 2024. While the plan is only intended to address the GSI pathway through the Allen Creek, EGLE expects the downgradient investigation to come in a later submittal. EGLE will review the draft and is expected to provide a response by the end of the year or early 2025. However, Gelman will begin collecting data immediately.

- EGLE provided official approval of a Western Area GSI work plan on July 18, 2024 at the request of Gelman. Gelman has indicated that they have performed work associated with the workplan.
- The next scheduled meeting will be held on Tuesday January 7, 2025, at 6 PM 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.

EGLE Water Resources Division has drafted a framework for a possible permit and is in the process of scheduling a meeting with Gelman representatives to review permit conditions. The permit is intended to address the illicit discharge by requiring an eventual elimination of the discharge into the drain.

Pall Groundwater Treatment Update

Total volume of groundwater treated July through November 2024:

126,530,942 gallons

Mass of 1,4 Dioxane Removed:

July: 89.87 lbs

August: 82.87 lbs

September: 78.42 lbs

October: 88.88 lbs

November: 79.49 lbs

Total: 419.53 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 March 2025

- EPA Updates
- EGLE and CARD Updates
- MS4 Permit
- NPDES Permitting Progress