



The Chemours Company  
Pompton Lakes Works  
2000 Cannonball Road  
Pompton Lakes, NJ 07442

April 13, 2018

Mr. Anthony Cinque  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Remediation  
401 East State Street, 5<sup>th</sup> Floor  
P.O. Box 028  
Trenton, NJ 08625-0028

**RE: Progress Report – 1<sup>st</sup> Quarter 2018  
Pompton Lakes Works Site  
Pompton Lakes, New Jersey  
PI#007411**

Dear Mr. Cinque:

In accordance with the Administrative Consent Order for the Pompton Lakes Works Site, enclosed for your review is the 1<sup>st</sup> Quarter 2018 Progress Report covering activities during January 1, 2018 through March 31, 2018.

If you have any questions, please contact me at (973) 492-7733.

Sincerely,

A handwritten signature in cursive script that reads 'David E. Epps'.

David E. Epps, P.G.  
Project Director, Pompton Lakes Works  
Corporate Remediation Group

cc: Perry Katz – USEPA Region II  
Ed Merrill – Borough of Pompton Lakes Environmental Officer  
Kevin Boyle – Borough of Pompton Lakes Borough Administrator  
PLW Central File

Attachments (1)

1<sup>st</sup> Quarter 2018 Progress Report  
Pompton Lakes Works Site  
Pompton Lakes, New Jersey

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## 1.0 Activities Scheduled

### Onsite Soils

- Remedial Design
  - Await further discussion with USEPA and NJDEP after their full review of the response to comments package on the CMS.

### Onsite Groundwater

- Remedial Investigation
  - Address comments, if any, on the *Draft Onsite Groundwater Bedrock Investigation Work Plan* submitted on April 26, 2016.
- Remedial Design/Pilot Study
  - Conduct performance monitoring (weather permitting) and evaluate data/path forward.
- Remedial Action
  - MW-107R
    - No activities planned.
  - Groundwater Pump & Treat System:
    - Continue GWETS system operation.
    - Conduct monthly sampling of system influent and effluent.
    - Collect quarterly water level measurements from monitoring wells and piezometers.
    - Submit 4<sup>th</sup> Quarter 2017 GWETS operating/monitoring reports.

### Offsite Groundwater

- Remedial Design
  - Hydraulic surcharging pilot study
    - Assist NJDEP, as needed, on follow-up to public hearing.
- Remedial Action
  - Vapor Intrusion:
    - Continue implementation of the VIRMWP.
    - Hold status calls with NJDEP/USEPA and talk with residents, as needed.

### Groundwater Compliance Monitoring Program

- Address comments, if any, on the *2014 Annual Groundwater Report* submitted on February 27, 2015.
- Address comments, if any, on the *2015 Annual Groundwater Report* submitted on February 29, 2016.
- Submit annual groundwater report.

### Pompton Lake Delta

- Address comments, if any, on the *Draft Ramapo-Pompton River Sediment Investigation Report* submitted on July 15, 2015.
- Address comments, if any, on the *Draft Long-Term Monitoring Plan* submitted on June 2, 2016.
- Address comments, if any, on the *Final Technical Memorandum – Proposed Revised Removal Area for Uplands Area A1* submitted on August 25, 2016.

- Address comments, if any, on the *Final Technical Memorandum – Change in Dredge Conditions Plan – Acid Brook Delta* submitted on October 3, 2017.
- Continue implementation of the remedy including the following activities:
  - Continue routine inspections of the site and work areas in accordance with approved permits and safety conditions, and
  - Continue demobilization of hydraulic dredge, sediment processing, and water treatment equipment/operations if weather permits.

#### Wanaque River

- Address comments, if any, on the *Response to NJDEP Comments – Wanaque River Interim Remedial Measure Data Collection Activities Report* submitted on November 9, 2015.

## **2.0 Activities Completed**

#### Onsite Soils

- Remedial Design
  - USEPA and NJDEP were still completing their full review of the response to comments package on the CMS; no discussions were held.

#### Onsite Groundwater

- Remedial Investigation
  - Received comments on the *Draft Onsite Groundwater Bedrock Investigation Work Plan*. Currently reviewing and will initiate a response, as applicable.
- Remedial Design/Pilot Study
  - Conducted performance monitoring as part of the ISCO pilot study.
- Remedial Action
  - MW-107R
    - No activities conducted.
  - Groundwater Pump & Treat System:
    - Continued GWETS system operation.
    - Conducted monthly sampling of system influent and effluent.
    - Collected quarterly water level measurements from monitoring wells and piezometers.
    - Submitted 4<sup>th</sup> Quarter 2017 GWETS operating/monitoring reports.

#### Offsite Groundwater

- Remedial Design
  - Hydraulic surcharging pilot study
    - NJDEP did not request any assistance in response to the public meeting.
- Remedial Action
  - Vapor Intrusion:
    - Continued implementation of the VIRMWP.
    - Held status calls with NJDEP/USEPA and talked with residents, as needed.
    - Conducted Phase 2 sampling and confirmatory sampling at one property.
    - Conducted long-term monitoring at three properties.
    - Installed one vapor mitigation system and conducted post-mitigation sampling.
    - Completed annual O&M inspections at properties where access was granted.
    - Transmitted laboratory packages and EDDs to NJDEP as they were submitted to Chemours from the laboratory. Preliminary results were also transmitted to property owners as they were received.

### Groundwater Compliance Monitoring Program

- No comments have been received to date on the *2014 Annual Groundwater Report*.
- No comments have been received to date on the *2015 Annual Groundwater Report*.
- Submitted annual groundwater report.

### Pompton Lake Delta

- No comments have been received to date on the *Draft Ramapo-Pompton River Sediment Investigation Report*.
- No comments have been received to date on the *Draft Long-Term Monitoring Plan*.
- No approval has been received to date on the *Final Technical Memorandum – Proposed Revised Removal Area for Uplands Area A1*.
- No approval has been received to date on the *Final Technical Memorandum – Change in Dredge Conditions Plan – Acid Brook Delta*.
- Continued implementation of the remedy including the following activities:
  - Continued routine inspections of the site and work areas in accordance with approved permits and safety conditions,
  - Continued demobilization of hydraulic dredge, sediment processing, and water treatment equipment/operations as weather permitted, and
  - Began mobilization of equipment for placement of eco-layer material.

### Wanaque River

- No comments have been received to date on the *Response to NJDEP Comments – Wanaque River Interim Remedial Measure Data Collection Activities Report*.

### **3.0 Activities Not Completed**

- None.

### **4.0 Problems/Delays Encountered**

- None.

### **5.0 Deviations to Approved Work Plan(s)**

- None.

### **6.0 Revised Schedule**

- None.

### **7.0 Status of Permit Applications**

- None.

### **8.0 Tabulation of Data, Correspondence, and Documents**

- Tabulation of Data
  - Monthly influent and effluent results are included in operational reports.
  - Vapor intrusion analytical results are submitted when received from laboratory.
  - Data tabulated, as applicable, and included in scheduled deliverables for submittal to NJDEP/USEPA.

- Tabulation of Correspondence and Documents

<b>Submission Date</b>	<b>Deliverable Title</b>
January 31, 2018	4 <sup>th</sup> Qtr. 2017 Site-wide Progress Report / VI Progress Report
January 31, 2018	4 <sup>th</sup> Qtr. 2017 GWET Operating Summary
February 28, 2018	2017 Annual Groundwater Report
March 22, 2018	Draft Impact to Groundwater Standards Technical Report

## **9.0 Activities Scheduled for Next Reporting Period (2<sup>nd</sup> Quarter 2018)**

### Onsite Soils

- Remedial Design
  - Await further discussion with USEPA and NJDEP after their full review of the response to comments package on the CMS.

### Onsite Groundwater

- Remedial Investigation
  - Address comments on the *Draft Onsite Groundwater Bedrock Investigation Work Plan*, as applicable.
- Remedial Design/Pilot Study
  - Evaluate performance monitoring data and path forward for ISCO pilot study program.
- Remedial Action
  - MW-107R
    - Collect sample for TOC analysis.
  - Groundwater Pump & Treat System:
    - Continue GWETS system operation.
    - Conduct monthly sampling of system influent and effluent.
    - Collect quarterly water level measurements from monitoring wells and piezometers.
    - Submit 1<sup>st</sup> Quarter 2018 GWETS operating/monitoring reports.

### Offsite Groundwater

- Remedial Design
  - Hydraulic surcharging pilot study
    - Assist NJDEP, as needed, on follow-up to public hearing.
- Remedial Action
  - Vapor Intrusion:
    - Continue implementation of the VIRMWP.
    - Hold status calls with NJDEP/USEPA, as needed.
    - Talk with residents, as needed.
    - Submit 2017-2018 VI O&M Report.

### Groundwater Compliance Monitoring Program

- Address comments, if any, on the *2014 Annual Groundwater Report* submitted on February 27, 2015.
- Address comments, if any, on the *2015 Annual Groundwater Report* submitted on February 29, 2016.
- Submit biennial CEA certification.
- Conduct semi-annual groundwater sampling event.

Pompton Lake Delta

- Address comments, if any, on the *Draft Ramapo-Pompton River Sediment Investigation Report* submitted on July 15, 2015.
- Address comments, if any, on the *Draft Long-Term Monitoring Plan* submitted on June 2, 2016.
- Address comments, if any, on the *Final Technical Memorandum – Proposed Revised Removal Area for Uplands Area A1* submitted on August 25, 2016.
- Address comments, if any, on the *Final Technical Memorandum – Change in Dredge Conditions Plan – Acid Brook Delta* submitted on October 3, 2017.
- Continue implementation of the remedy including the following activities:
  - Continue routine inspections of the site and work areas in accordance with approved permits and safety conditions,
  - Complete demobilization of hydraulic dredge, sediment processing, and water treatment equipment/operations,
  - Complete mobilization of equipment for eco-layer placement, and
  - Begin placement of eco-layer material in ABD and Island Area.

Wanaque River

- Address comments, if any, on the *Response to NJDEP Comments – Wanaque River Interim Remedial Measure Data Collection Activities Report* submitted on November 9, 2015.

Schedule of Regulatory-Required Deliverables for Site

<b>Submission Timeline</b>	<b>Deliverable Type</b>
April 30, 2018	1 <sup>st</sup> Qtr. 2018 GWET Operating Summary
April 30, 2018	1 <sup>st</sup> Qtr. 2018 Site-wide Progress Report
April 30, 2018	Biennial CEA Certification
April 30, 2018	2017-2018 VI O&M Report

Schedule of Anticipated Field Activities for Site

<b>Date of Activity</b>	<b>Field Activity Description</b>
Apr/May/June 2018	System influent and effluent sampling
May 2018	Water level measurements
May 2018	Semi-annual groundwater sampling