



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

January 24, 2019

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 – 4<sup>th</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 4<sup>th</sup> Quarter 2018 Progress Report covering activities during October 1, 2018 through December 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  
Kevin Boyle – Borough of Pompton Lakes Borough Administrator  
PLW Central File

Attachments (1)

4<sup>th</sup> Quarter 2018 Progress Report  
Pompton Lakes Works Site  
Pompton Lakes, New Jersey

---

## 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
  - Begin preparations to initiate the bedrock investigation program.
- Remedial Design/Pilot Study
  - Address comments, if any, on the Draft Technical Memorandum – Onsite Groundwater Design Testing Results submitted on August 30, 2018.
- 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 3<sup>rd</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.

### 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.
- Conduct semi-annual 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.
- Conduct lake restoration activities consisting of:
  - Piezometer installation for measurement of surface water during Spring 2019 (in accordance with NJDEP permits);
  - Live stake installation; and
  - Ongoing inspections of the restoration areas.
- Begin preparation of completion report.

### 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
  - Met with USEPA and NJDEP on November 14, 2018 to discuss their review of the response to comments package on the CMS.

### Onsite Groundwater

- Remedial Investigation
  - Initiated the bedrock investigation program.
- Remedial Design/Pilot Study
  - Received correspondence from NJDEP dated October 16, 2018 regarding their review of the Draft Technical Memorandum – Onsite Groundwater Design Testing Results submitted on August 30, 2018.
  - Conducted field activities consisting of thermal imaging reconnaissance survey and surface water sampling.
- Remedial Action
  - MW-107R
    - No activities planned.
  - 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 3<sup>rd</sup> Quarter 2018 GWETS operating/monitoring reports.

### Offsite Groundwater

- Remedial Design
  - Hydraulic surcharging pilot study
    - Received correspondence from NJDEP dated November 27, 2018 stating that the discharge to groundwater permit-by-rule application has been denied.
- Remedial Action
  - Vapor Intrusion:
    - Continued implementation of the VIRMWP.
    - Held status calls with NJDEP/USEPA and talked with residents, as needed.

- Conducted long-term monitoring (sampling of indoor/outdoor air) at two properties.
- Laboratory package of long-term monitoring results submitted to NJDEP on December 21, 2018.
- Preliminary data results for long-term monitoring submitted to two property owners on December 21, 2018.

#### 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*.
- Conducted the semi-annual sampling event.

#### 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*.
- Conducted lake restoration activities consisting of:
  - Live stake installation and ongoing inspections of the restoration areas.
  - Attempted piezometer installation (for measurement of surface water during spring 2019 in accordance with NJDEP permits). However, conditions were too wet to safely and technically execute the work.
- Submitted the Wetland Mitigation Construction Completion Report in accordance with NJDEP permits.

#### 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>
October 19, 2018	3 <sup>rd</sup> Qtr. 2018 Site-wide Progress Report
October 19, 2018	3 <sup>rd</sup> Qtr. 2018 GWET Operating Summary
December 26, 2018	Wetland Mitigation Construction Completion Report

## **9.0 Activities Scheduled for Next Reporting Period (1<sup>st</sup> Quarter 2019)**

### Onsite Soils

- Remedial Design
  - Receive comment letter from USEPA regarding the current draft CMS.

### Onsite Groundwater

- Remedial Investigation
  - Continue the bedrock investigation program.
- Remedial Design/Pilot Study
  - Evaluate thermal imaging reconnaissance data and surface water sampling results.
  - Submit response to the one NJDEP comment on the Draft Technical Memorandum – Onsite Groundwater Design Testing Results as well as summarize the results of field activities conducted since submittal of the technical memorandum.
- 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 2018 GWETS operating/monitoring reports.

### Offsite Groundwater

- Remedial Investigation
  - Begin planning for NJDEP-requested installation of one shallow and one bedrock offsite monitoring well.
- Remedial Action
  - Vapor Intrusion:
    - Continue implementation of the VIRMWP.
    - Hold status calls with NJDEP/USEPA, as needed.
    - 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 2018 Annual Groundwater Monitoring Report by February 28, 2019.
- Submit renewal application of the site water allocation permit.

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.
- Conduct lake restoration activities consisting of:
  - Ongoing inspections of the restoration areas, and
  - Continue monitoring site conditions for piezometer installation (measurement of surface water during Spring 2019 in accordance with NJDEP permits);
- Submit RCRA Completion Report by March 31, 2019.

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>
January 31, 2019	4 <sup>th</sup> Qtr. 2018 GWET Operating Summary
January 31, 2019	4 <sup>th</sup> Qtr. 2018 Site-wide Progress Report
February 28, 2019	2018 Annual Groundwater Monitoring Report
February 28, 2019	Water Allocation Permit Renewal Application
March 31, 2019	RCRA Completion Report
March 31, 2019	Acid Brook Monitoring Plan

Schedule of Anticipated Field Activities for Site

<b>Date of Activity</b>	<b>Field Activity Description</b>
Jan/Feb/Mar 2019	System influent and effluent sampling
February 2018	Water level measurements