



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

July 21, 2017

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

**RE: Progress Report – 2nd Quarter 2017
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 2nd Quarter 2017 Progress Report covering activities during April 1, 2017 through June 30, 2017. A vapor intrusion program summary for the reporting period is also provided as part of this quarterly progress report.

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

Sincerely,

A handwritten signature in black ink 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 (2)

2nd Quarter 2017 Progress Report
Pompton Lakes Works Site
Pompton Lakes, New Jersey

1.0 Activities Scheduled

Onsite Soils

- Remedial Design
 - Develop schedule for submitting revised CMS once use of alternative remediation standards is addressed by USEPA.

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
 - Complete evaluation of ISCO design testing program results and discuss path forward with NJDEP and USEPA.
- Remedial Action
 - MW-107R
 - Conduct annual sampling at MW-107R for total organic carbon and transmit results in 2nd Qtr. 2017 Site Progress Report (due July 31, 2017).
 - 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 1st Quarter 2017 GWETS operating/monitoring reports.

Offsite Groundwater

- Remedial Design
 - Hydraulic surcharging pilot study
 - Assist NJDEP, as needed, on public hearing if requested by public.
- Remedial Action
 - Vapor Intrusion:
 - Continue implementation of the VIRMWP.
 - Hold status calls with NJDEP/USEPA, as needed.

Groundwater Compliance Monitoring Program

- Conduct semi-annual sampling event.
- Address comments, if any, on the *2014 Annual Groundwater Report* which was submitted on February 27, 2015.
- Address comments, if any, on the *2015 Annual Groundwater Report* which was submitted on February 29, 2016.
- Address comments, if any, on the *Response to NJDEP Correspondence dated 2 June 2016 – Comments on 2016 Classification Exception Area – Biennial Certification* which was submitted on August 3, 2016.
- Address comments, if any, on the *2016 Annual Groundwater Report* which was submitted on February 28, 2017.

Pompton Lake Delta

- Address comments, if any, on the *Draft Ramapo-Pompton River Sediment Investigation Report* which was 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.
- Continue implementation of the remedy including the following activities (weather-dependent):
 - Continue routine inspections of the site and work areas in accordance with approved permits and safety conditions,
 - Complete eco-layer placement in Lake Area A,
 - Complete installation of high energy supply to site for sediment processing equipment associated with hydraulic dredging,
 - Complete site reconfiguration for hydraulic dredging process,
 - Complete installation of hydraulic dredging sediment processing and water treatment system,
 - Mobilize hydraulic dredges and install dredge line,
 - Complete installation of turbidity curtain and conduct fish relocation,
 - Complete dewatering and water treatment system testing, and
 - Begin hydraulic dredging, processing, and offsite disposal of sediment in the Acid Brook Delta Area.

Wanaque River

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

2.0 Activities Completed

Onsite Soils

- Remedial Design
 - Received comments on the CMS from NJDEP/USEPA dated May 31, 2017. Initiated review of the comments.

Onsite Groundwater

- Remedial Investigation
 - No comments have been received to date on the *Draft Onsite Groundwater Bedrock Investigation Work Plan*.
- Remedial Design/Pilot Study
 - Completed evaluation of ISCO design testing program results and notified NJDEP and USEPA of future plan including a second round of injections and sampling.

- Remedial Action
 - MW-107R
 - Conduct annual sampling at MW-107R on June 1, 2017. The total organic carbon concentration was 1,080 mg/L.
 - 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 1st Quarter 2016 GWETS operating/monitoring reports.

Offsite Groundwater

- Remedial Design
 - Hydraulic surcharging pilot study
 - NJDEP did not hold a public hearing yet.
- Remedial Action
 - Vapor Intrusion:
 - Continued implementation of the VIRMWP.
 - Held status calls with NJDEP/USEPA, as needed.

Groundwater Compliance Monitoring Program

- Conducted semi-annual sampling event.
- No comments have been received to date on the *2014 Annual Groundwater Report* which was submitted on February 27, 2015.
- No comments have been received to date on the *2015 Annual Groundwater Report* which was submitted on February 29, 2016.
- No approval has been received to date on the *Response to NJDEP Correspondence dated 2 June 2016 – Comments on 2016 Classification Exception Area – Biennial Certification* which was submitted on August 3, 2016.
- Approval of the *2016 Annual Groundwater Report* was received from NJDEP dated April 10, 2017.

Pompton Lake Delta

- No comments have been received to date on the *Draft Ramapo-Pompton River Sediment Investigation Report* which was submitted on July 15, 2015.
- No comments have been received to date on the *Draft Long-Term Monitoring Plan* submitted on June 2, 2016.
- No approval has been received to date on the *Final Technical Memorandum – Proposed Revised Removal Area for Uplands Area A1* submitted on August 25, 2016.
- Continued implementation of remedy:
 - Continued routine inspections of the site and work areas in accordance with approved permits and safety conditions,
 - Completed eco-layer placement in Lake Area A,
 - Completed installation of high energy supply to site for sediment processing equipment associated with hydraulic dredging,
 - Completed site reconfiguration for hydraulic dredging process,
 - Completed installation of hydraulic dredging sediment processing and water treatment system,
 - Mobilized hydraulic dredges and installed dredge line,
 - Completed installation of turbidity curtain and conducted fish relocation,

- Conducted pre-dredge bathymetric survey,
- Met with residents along shoreline to discuss work that will be occurring;
- Completed dewatering and water treatment system leak and batch testing,
- Began shoreline clearing and grubbing,
- Began shoreline excavation (drag to dredge area); and
- Began hydraulic dredging, processing, and offsite disposal of sediment in the Acid Brook Delta Area.

Wanaque River

- No comments have been received to date on the *Response to NJDEP Comments – Wanaque River Interim Remedial Measure Data Collection Activities Report* which was submitted on November 9, 2015.

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 to NJDEP when received from laboratory.
 - Data tabulated, as applicable, and included in scheduled deliverables for submittal to NJDEP/USEPA.
- Tabulation of Correspondence and Documents

Submission Date	Deliverable Title
April 27, 2017	1 st Qtr. 2017 Site-wide Progress Report / VI Progress Report
April 27, 2017	1 st Qtr. 2017 GWET Operating Summary
May 15, 2017	Response to Comments – Qtr. Groundwater Extraction & Treatment Operating Summary

9.0 Activities Scheduled for Next Reporting Period (3rd Quarter 2017)

Onsite Soils

- Remedial Design
 - Complete review of CMS comments from USEPA and discuss path forward for revisions.

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
 - Complete 2nd round of injections and sampling. Evaluate data and discuss path forward with NJDEP and USEPA.
- 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 2nd Quarter 2017 GWETS operating/monitoring reports.

Offsite Groundwater

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

Groundwater Compliance Monitoring Program

- Address comments, if any, on the *2014 Annual Groundwater Report* which was submitted on February 27, 2015.
- Address comments, if any, on the *2015 Annual Groundwater Report* which was submitted on February 29, 2016.
- Address comments, if any, on the *Response to NJDEP Correspondence dated 2 June 2016 – Comments on 2016 Classification Exception Area – Biennial Certification* which was submitted on August 3, 2016.

Pompton Lake Delta

- Address comments, if any, on the *Draft Ramapo-Pompton River Sediment Investigation Report* which was 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.

- Continue implementation of the remedy including the following activities (weather-dependent):
 - Continue routine inspections of the site and work areas in accordance with approved permits and safety conditions,
 - Continue hydraulic dredging,
 - Continue dewatering/filter press operation,
 - Continue water treatment, compliance sampling, and discharge,
 - Continue transport and disposal of dewatered sediments (cake),
 - Continue shoreline clearing and grubbing, and
 - Conduct overall site maintenance and housekeeping.

Wanaque River

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

Schedule of Regulatory-Required Deliverables for Site

Submission Timeline	Deliverable Type
July 31, 2017	2 nd Qtr. 2017 GWET Operating Summary
July 31, 2017	2 nd Qtr. 2017 Site-wide Progress Report / VI Progress Report

Schedule of Anticipated Field Activities for Site

Date of Activity	Field Activity Description
July/Aug/Sept 2017	System influent and effluent sampling
July/August 2017	ISCO injection and groundwater sampling
August 2017	Water level measurements

1.0 ACTIVITIES COMPLETED

Expanded Investigation Area (EIA)/Vapor Mitigation Area (VMA) Status

- There are currently a total of 76 properties identified as part of the EIA, broken down as follows:
 - Original EIA properties – 32
 - Properties changed from EIA to VMA based on sub-slab results – 10
 - Properties added to EIA based on adjacent sub-slab results – 10
 - 200-foot Buffer/CEA #4 boundary Expanded EIA locations – 39
 - Additional properties added by NJDEP – 2
 - Additional properties added by USEPA - 3
- There are currently a total of 422 residential properties (includes those properties changed from EIA to VMA based on sub-slab results) and 1 industrial property identified as part of the VMA (423 total properties). Two properties previously in the VMA underwent termination sampling and were approved for termination by NJDEP/USEPA. The systems were relinquished to the property owners and, as such, are not included in the total count of 422 properties. There are an additional 13 empty lots (no structures) in the VMA (also not included in total count).

Work Plan Implementation

Sampling

- Termination sampling (sub-slab soil gas, indoor/outdoor air) was completed at one property.

System Design Visits/Drawings and Approval Process

- No work was completed during the reporting period.

System Installation

- No work was completed during the reporting period.

System Operation & Maintenance

- Annual O&M inspections were completed at properties where access was granted.

Communications

- Talked with residents during the course of the reporting period, at their request, to discuss the vapor program and any questions/concerns they had about sampling, design, and system installation.
- Calls were held with NJDEP and USEPA, as needed, to update the project team on the status of activities and any issues requiring discussion/approval.

Submittals

- The 1st Quarter 2017 Status Report for the VI program was submitted on April 27, 2017.
- Laboratory packages and required electronic data deliverables were transmitted to NJDEP as they were submitted to Chemours from the laboratory (TestAmerica). Four data packages (14 total samples) were submitted during the reporting period.
- Results were mailed to property owners as they were received by Chemours from the laboratory. Five letters were transmitted during the reporting period.
- Submitted the *2016-2017 Operation & Maintenance Report* on April 27, 2017. Received approval of the document from NJDEP on June 16, 2017.
- Submitted the *Revised Vapor Interim Remedial Measure Work Plan* on April 7, 2017.

2.0 PROBLEMS/DELAYS ENCOUNTERED AND RECOMMENDED SOLUTIONS

- There continues to be a number of property owners located in both the EIA and VMA that have been non-responsive. These owners have been contacted on numerous occasions via telephone as well as dropping postcards off at their homes. Work continues in conjunction with NJDEP and USEPA in contacting these owners.

3.0 DEVIATIONS TO APPROVED WORK PLAN(S)

- No deviations noted during the reporting period.

ACTIVITIES SCHEDULED FOR NEXT REPORTING PERIOD (3rd QTR 2017)

EIA/VMA Status

- Continue to track status of work conducted in EIA and VMA.

Work Plan Implementation

- Continue implementation of vapor intrusion field program which includes sampling, design testing, installation of sub-slab depressurization systems, post-mitigation indoor air sampling, termination sampling, reporting, and operation & maintenance visits.

Communications

- Provide NJDEP and USEPA with status updates regarding the vapor intrusion program.

Submittals

- Transmit analytical data/results to NJDEP and property owners as sampling is completed and reported by the laboratory.
- Submit two Remedial Measure Reports for post-mitigation samples collected during 1st Quarter 2017.