



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

October 18, 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 – 3rd 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 3rd Quarter 2017 Progress Report covering activities during July 1, 2017 through September 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 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 (2)

3rd Quarter 2017 Progress Report
Pompton Lakes Works Site
Pompton Lakes, New Jersey

1.0 Activities Scheduled

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* submitted on February 27, 2015.
- Address comments, if any, on the *2015 Annual Groundwater Report* 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* submitted on August 3, 2016.

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.
- 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* submitted on November 9, 2015.

2.0 Activities Completed

Onsite Soils

- Remedial Design
 - Submitted response to USEPA/NJDEP comments to the CMS on August 18, 2017. Met with USEPA and NJDEP on September 12, 2017 to discuss comments and responses.

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 2nd round of injections and sampled groundwater for presence/absence of persulfate.
- 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 2nd Quarter 2016 GWETS operating/monitoring reports.

Offsite Groundwater

- Remedial Design
 - Hydraulic surcharging pilot study
 - Assisted NJDEP, as requested, for the public meeting held on September 26, 2017.
- Remedial Action
 - Vapor Intrusion:
 - Continued implementation of the VIRMWP.
 - Held status calls with NJDEP/USEPA, as needed.

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*.
- 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*.

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*.
- Submitted *Draft Technical Memorandum – Change in Dredge Conditions Plan – Acid Brook Delta*. Received comments from USEPA and submitted a response to comments as well as subsequent clarifications to those responses.
- Continued implementation of remedy:
 - Continued routine inspections of the site and work areas in accordance with approved permits and safety conditions,
 - Continued hydraulic dredging,
 - Continued dewatering/filter press operation,
 - Continued water treatment, compliance sampling, and discharge,
 - Continued transport and disposal of dewatered sediments (cake),
 - Continued shoreline clearing and grubbing, and
 - Conducted overall site maintenance and housekeeping.

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

Submission Date	Deliverable Title
July 21, 2017	2 nd Qtr. 2017 Site-wide Progress Report / VI Progress Report
July 21, 2017	2 nd Qtr. 2017 GWET Operating Summary
August 18, 2017	Request for Extension – Revised Onsite Soils CMS (included response to USEPA/NJDEP comments)
September 14, 2017	Draft Technical Memorandum Change in Dredge Conditions Plan – Acid Brook Delta

9.0 Activities Scheduled for Next Reporting Period (4th Quarter 2017)

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
 - Evaluate conditions for groundwater sampling following 2nd round of injections. 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 3rd 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, 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.

- Address comments, if any, on the *Response to NJDEP Correspondence dated 2 June 2016 – Comments on 2016 Classification Exception Area – Biennial Certification* submitted on August 3, 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.
- Address comments, if any, on the *Final Technical Memorandum – Proposed Revised Removal Area for Uplands Area A1* submitted on August 25, 2016.
- Submit *Final Technical Memorandum – Change in Dredge Conditions Plan – Acid Brook Delta*.
- 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 hydraulic dredging,
 - Complete dewatering/filter press operation,
 - Complete water treatment, compliance sampling, and discharge,
 - Complete transport and disposal of dewatered sediments (cake),
 - Complete shoreline clearing and grubbing,
 - Conduct overall site maintenance and housekeeping,
 - Begin demobilization of hydraulic dredge, sediment processing, and water treatment equipment/operations, and
 - Based on weather conditions, assess viability of initiating eco-layer placement.

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

Submission Timeline	Deliverable Type
October 3, 2017	Final Technical Memorandum Change in Dredge Conditions Plan – Acid Brook Delta
October 31, 2017	3 rd Qtr. 2017 GWET Operating Summary
October 31, 2017	3 rd Qtr. 2017 Site-wide Progress Report / VI Progress Report

Schedule of Anticipated Field Activities for Site

Date of Activity	Field Activity Description
Oct/Nov/Dec 2017	System influent and effluent sampling
November 2017	Semi-annual groundwater sampling
November 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

- No work was completed during the reporting period.

System Design Visits/Drawings and Approval Process

- Design visits were conducted at three properties.
- One design drawing was completed and approved by the property owner.

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 2nd Quarter 2017 Status Report for the VI program was submitted on July 21, 2017.
- Remedial Measure Reports for two properties were submitted on July 7, 2017.
- The termination sampling package for one property was submitted on September 11, 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 (4th 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.