



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

January 31, 2018

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 – 4th 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 4th Quarter 2017 Progress Report covering activities during October 1, 2017 through December 31, 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". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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)

4th Quarter 2017 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
 - 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.

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
 - No comments have been received to date on the *Draft Onsite Groundwater Bedrock Investigation Work Plan*.
- Remedial Design/Pilot Study
 - Performance sampling was conducted. Evaluated data and provided an update to NJDEP and USEPA on the path forward.
- 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 3rd 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, 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*.
- Conducted 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*.
- No approval has been received to date on the *Final Technical Memorandum – Proposed Revised Removal Area for Uplands Area A1*.
- Submitted *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,
 - Completed hydraulic dredging,
 - Completed dewatering/filter press operation,
 - Completed water treatment, compliance sampling, and discharge associated with dredging operations,
 - Completed transport and disposal of dewatered sediments (cake),
 - Completed shoreline clearing and grubbing,
 - Conducted overall site maintenance and housekeeping, and
 - Began demobilization of hydraulic dredge, sediment processing, and water treatment equipment/operations which included the disposal of sediment residuals and treatment of water generated during deconning of equipment.

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
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October 3, 2017	Final Technical Memorandum Change in Dredge Conditions Plan – Acid Brook Delta
October 18, 2017	3 rd Qtr. 2017 Site-wide Progress Report / VI Progress Report
October 18, 2017	3 rd Qtr. 2017 GWET Operating Summary

9.0 Activities Scheduled for Next Reporting Period (1st 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, 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 4th 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.
- 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,
 - 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.

Schedule of Regulatory-Required Deliverables for Site

Submission Timeline	Deliverable Type
January 31, 2018	4 th Qtr. 2017 GWET Operating Summary
January 31, 2018	4 th Qtr. 2017 Site-wide Progress Report / VI Progress Report
February 28, 2018	2017 Annual Groundwater Report

Schedule of Anticipated Field Activities for Site

Date of Activity	Field Activity Description
Jan/Feb/Mar 2018	System influent and effluent sampling
February 2018	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 421 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 (422 total properties). Three 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 property count. There are an additional 13 empty lots (no structures) in the VMA (also not included in total count).

Work Plan Implementation

Sampling

- Phase 2 sampling was conducted at two properties.

System Design Visits/Drawings and Approval Process

- One design visit was conducted.
- One design drawing was completed and approved by the property owner.
- One permit application was submitted to the Borough of Pompton Lakes for approval.

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 3rd Quarter 2017 Status Report for the VI program was submitted on October 18, 2017.
- Laboratory packages and required electronic data deliverables were transmitted to NJDEP as they were submitted to Chemours from the laboratory (TestAmerica). One data package (5 samples) was submitted during the reporting period.
- The Addendum to June 2008 Vapor Interim Remedial Measure Work Plan was submitted on December 12, 2017 requesting the use of the USEPA TO-15 laboratory method moving forward for analysis of samples.

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 (1st QTR 2018)

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.