



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

April 19, 2019

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 – 1st Quarter 2019
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 1st Quarter 2019 Progress Report covering activities during January 1, 2019 through March 31, 2019.

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
Kevin Boyle – Borough of Pompton Lakes Borough Administrator
PLW Central File

Attachments (1)

1st Quarter 2019 Progress Report
Pompton Lakes Works Site
Pompton Lakes, New Jersey

1.0 Activities Scheduled

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 4th 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:
 - Address comments, if any, on the *Revised Vapor Interim Remedial Measure Work Plan* submitted on April 7, 2017.
 - 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);
- Continue preparation of RCRA 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
 - Following the technical meeting between USEPA, NJDEP, and Chemours in November 2018, USEPA transmitted correspondence dated January 2, 2019 regarding NJDEP/USEPA's review of the Chemours response to comments letter dated August 18, 2017 on the current draft CMS. The Chemours response to comments was in response to comments previously provided by NJDEP and USEPA in correspondence dated May 31, 2017.
 - As directed in the January 2, 2019 letter, initiated preparation of a revised CMS.

Onsite Groundwater

- Remedial Investigation
 - Continued bedrock investigation program in accordance with the *Draft Onsite Groundwater Bedrock Investigation Work Plan* submitted to NJDEP and USEPA on April 26, 2016 and approved by NJDEP on August 1, 2018.
- Remedial Design/Pilot Study
 - Evaluated thermal imaging reconnaissance data and surface water sampling results.
 - Submitted response to the one NJDEP comment on the *Draft Technical Memorandum – Onsite Groundwater Design Testing Results* as well as summarized field activities conducted since submittal of the technical memorandum and proposed upcoming sampling. NJDEP had indicated in their comment letter that any USEPA comments would be forthcoming under separate cover.
- 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 4th Quarter 2018 GWETS operating/monitoring reports.

Offsite Groundwater

- Remedial Investigation
 - A verbal request was made by NJDEP in November 2018 to install one shallow and one bedrock monitoring well offsite. Due to the time of year (winter), it was concurred that this work could be completed in the spring of 2019. Began planning for NJDEP-requested installation of one shallow and one bedrock offsite monitoring well.
- Remedial Action
 - Vapor Intrusion:
 - No comments have been received on the *Revised Vapor Interim Remedial Measure Work Plan* submitted on April 7, 2017.
 - 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 three properties.
 - Conducted design testing at one property.
 - Submitted permits to the Borough of Pompton Lakes and received approval for system installation at two properties.

Groundwater Compliance Monitoring Program

- No comments have been received on the *2014 Annual Groundwater Report* submitted on February 27, 2015.
- No comments have been received on the *2015 Annual Groundwater Report* submitted on February 29, 2016.
- Submitted 2018 Annual Groundwater Monitoring Report.
- Submitted renewal application of the site water allocation permit.

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*.
- 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);
- Received approval on the Wetland Mitigation Construction Completion Report submitted in accordance with NJDEP permits.
- Continued preparation of RCRA Completion Report.

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
January 24, 2019	4 th Qtr. 2019 Site-wide Progress Report
January 24, 2019	4 th Qtr. 2019 GWET Operating Summary
February 28, 2019	<i>2018 Annual Groundwater Report</i>
February 28, 2019	Water Allocation Renewal Permit Application
March 27, 2019	Response to Comments – NJDEP Review of <i>Draft Technical Memorandum – Onsite Groundwater Design Testing Results</i>

9.0 Activities Scheduled for Next Reporting Period (2nd Quarter 2019)

Onsite Soils

- Remedial Design
 - Submit Revised CMS.

Onsite Groundwater

- Remedial Investigation
 - Complete bedrock investigation program (well installation).
- Remedial Design/Pilot Study
 - No activities planned. Surface water sampling and collection of water levels to be completed during base flow conditions during summer and will be dependent on weather conditions.
- Remedial Action
 - MW-107R
 - Collect groundwater sample for total organic carbon 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 1st Quarter 2019 GWETS operating/monitoring reports.

Offsite Groundwater

- Remedial Investigation
 - As verbally requested by NJDEP, install one shallow and one bedrock offsite monitoring well.

- Remedial Action
 - Vapor Intrusion:
 - Address comments, if any, on the *Revised Vapor Interim Remedial Measure Work Plan* submitted on April 7, 2017.
 - Continue implementation of the VIRMWP.
 - Hold status calls with NJDEP/USEPA, as needed.
 - Talk with residents, as needed.
 - Submit 2018-2019 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.
- Address comments, if any, on the *2018 Annual Groundwater Report* submitted on February 28, 2019.
- 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.
- Conduct lake restoration activities consisting of:
 - Ongoing inspections of the restoration areas,
 - Address any areas requiring re-planting/re-seeding,
 - Repair any damaged fencing around restoration areas due to winter damage, and
 - Install piezometers for measurement of surface water during spring 2019 in accordance with NJDEP permits.
- Submit RCRA 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.
- Submit Draft CMS.

Schedule of Anticipated Deliverables for Site

Submission Timeline	Deliverable Type
April 30, 2019	1 st Qtr. 2019 GWET Operating Summary
April 30, 2019	1 st Qtr. 2019 Site-wide Progress Report
April 30, 2019	Revised Onsite Soils CMS
April 2019	2018-2019 VI O&M Report
April/May 2019	Draft Wanaque River CMS
Within Q2 2019	RCRA Completion Report

Schedule of Anticipated Field Activities for Site

Date of Activity	Field Activity Description
Apr/May/June 2019	System influent and effluent sampling
April/May 2019	Offsite well installation
April/May 2019	Lake piezometer installation
May 2019	Water level measurements
May 2019	Semi-annual groundwater sampling event
June 2019	107R groundwater sample collection (for TOC)