

*Region 2 serving the people of New Jersey,  
New York, Puerto Rico and the U.S. Virgin Islands*



# POMPTON LAKES WORKS SITE 3<sup>RD</sup> PARTY CONTRACTOR PROGRAM

**JULY 22, 2015**



8/7/2015



## EPA/NJDEP PROJECT TEAM

### EPA

- Perry Katz, Project Manager
  - 212-637-4426
  - [katz.ira-perry@epa.gov](mailto:katz.ira-perry@epa.gov)
  
- Cliff Ng, Project Manager
  - 212-637-4113
  - [ng.clifford@epa.gov](mailto:ng.clifford@epa.gov)
  
- Pat Seppi, Community Involvement Coordinator
  - 646-369-0068
  - [seppi.pat@epa.gov](mailto:seppi.pat@epa.gov)



## EPA/NJDEP PROJECT TEAM

### NJDEP

- Anthony Cinque, Case Manager
  - 609-633-1416
  - [Anthony.Cinque@dep.nj.gov](mailto:Anthony.Cinque@dep.nj.gov)
  
- John Boyer, VI Technical Coordinator
  - 609-984-9751
  - [John.Boyer@dep.nj.gov](mailto:John.Boyer@dep.nj.gov)
  
- Mindy Mumford, Community Relations Manager
  - 609-777-1976
  - [Mindy.Mumford@dep.nj.gov](mailto:Mindy.Mumford@dep.nj.gov)



## CHEMOURS PROJECT TEAM

### Chemours

- David Epps, Project Manager  
973-492-7703



## BRIEF BACKGROUND

- Vapor Interim Remedial Measures Work Plan (VIRM WP) Approved in June 2008 Identified Vapor Mitigation Area & Procedures for VI Sampling/VMS Installation
- Site-specific VI Comparison Levels Determined/Approved
- VI Phase 2 Sampling Program Approved November 2009
- VI Screening Levels Updated by NJDEP in March 2013



## STATUS UPDATE - VAPOR INTRUSION PROGRAM

### Changes to Toxicity Values - Tetrachloroethene (PCE)

#### SUB-SLUB SOIL GAS

Previous ( $\mu\text{g}/\text{m}^3$ )	Current ( $\mu\text{g}/\text{m}^3$ )
16	470

#### INDOOR AIR

Previous ( $\mu\text{g}/\text{m}^3$ )	Current ( $\mu\text{g}/\text{m}^3$ )
1	9



## STATUS UPDATE - VAPOR INTRUSION PROGRAM

### Changes to Toxicity Values - Trichloroethene (TCE)

#### SUB-SLAB SOIL GAS

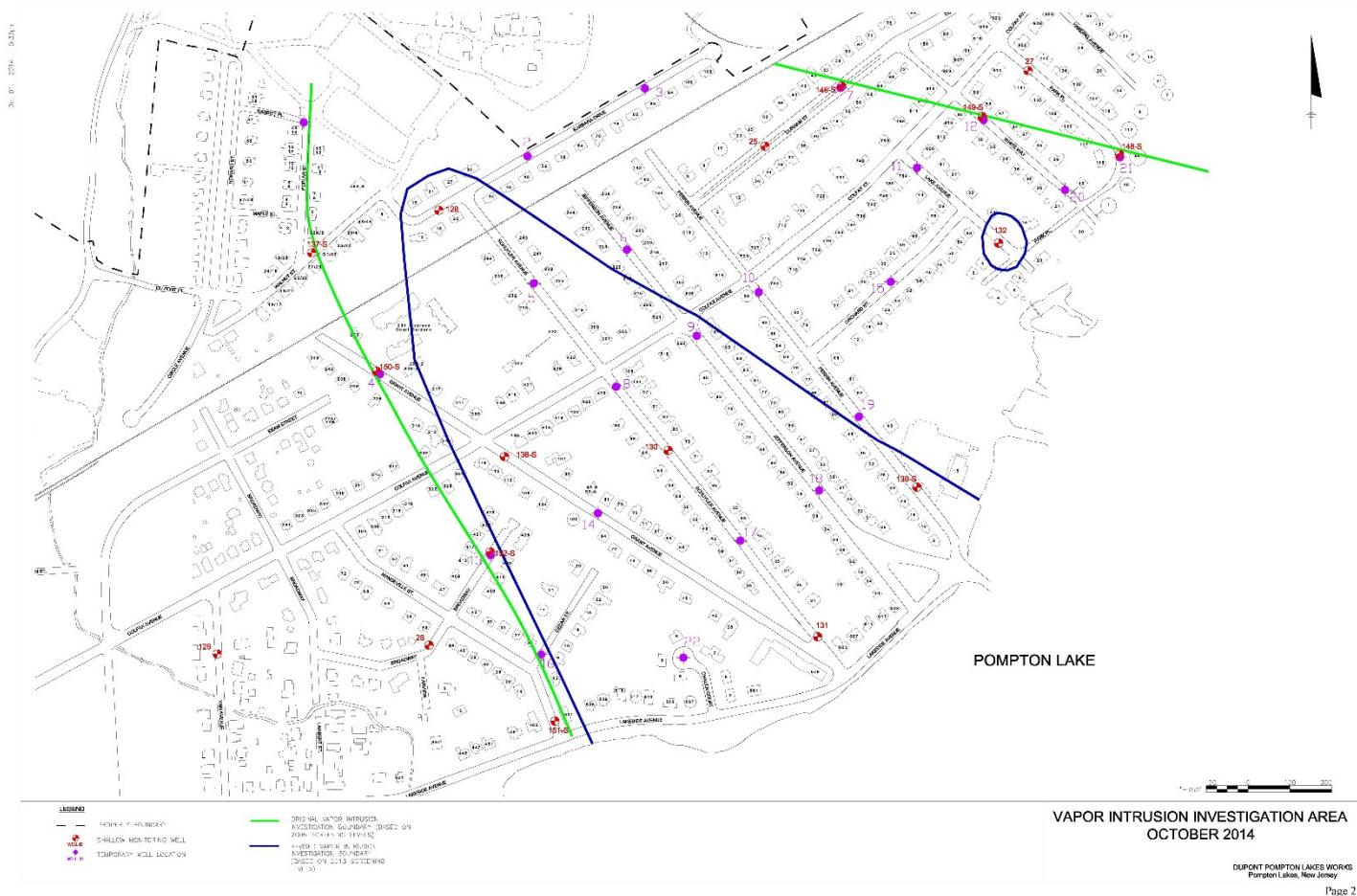
Previous ( $\mu\text{g}/\text{m}^3$ )	Current ( $\mu\text{g}/\text{m}^3$ )
11	27

#### INDOOR AIR

Previous ( $\mu\text{g}/\text{m}^3$ )	Current ( $\mu\text{g}/\text{m}^3$ )
1	2



## VAPOR INTRUSION INVESTIGATION AREA - 2014







## BRIEF BACKGROUND

- DuPont Requests Revision to 2008 VIRM WP in April 2013
- NJDEP/EPA Approve Use of Updated VISLs, But Do Not Approve Revised VIRM WP on February 6, 2014.
- EPA/NJDEP Mail VI Info Packages on July 17, 2015 to Approximately 425 Property Owners in Vapor Mitigation Area for the Purpose of:
  - Providing Summary of Data Collected from Property to Date
  - Providing Contact Info For Options re: Sampling, VMS Installation/Termination/Decommissioning/Monitoring



## VI INFORMATION PACKAGE CONTENT

- Cover Letter from NJDEP/EPA Introducing VI Info Package
- Figure Depicting Original Vapor Mitigation Area Based on Comparison Levels in 2008 & Revised Vapor Intrusion Investigation Area Based on 2013 NJDEP VI Groundwater Screening Levels
- Property Worksheet - Lists Activities Completed at the Property and Options for Installation/Termination/Decommissioning/Monitoring or Sampling Consistent with NJDEP VIG and Approved Work Plans



## VI INFORMATION PACKAGE CONTENT

- Data Tables - Relevant Data Tables for the Property as Back-up to the Property Worksheet Including Comparison to 2013 NJDEP VISLs
- Options - Detailed Explanations of Each Option Available for the Specific Property Consistent with NJDEP VIG and Approved Work Plans
- Contact Info - Contact Information for EPA/NJDEP/Chemours for Interested Parties to Ask Questions



## VI INFO PACKAGE IMPORTANT CONSIDERATIONS

- Property Owners Not Required to Take Any Action (Pick an Option) if they Choose
- Although NJDEP VISLs Have Changed, Property Owners in the Original Vapor Mitigation Area Are Still Eligible for VMS Installation With or Without Sampling Per 2008 Work Plan
- EPA/NJDEP/Chemours Encouraging Sampling Per 2008 Work Plan/Amendments and NJDEP VIG to Allow Property Owner to Make an Informed Decision About the Need for VMS Installation
- Decisions About VI Sampling/Termination/Decommissioning Rest with the Property Owner



## VI INFO PACKAGE IMPORTANT CONSIDERATIONS

- Termination of VMS
  - Decision to Collect Termination Samples Requires Review/Approval by NJDEP/EPA
  - Sampling Required to Determine if VMS Operation Can be Terminated
- If Data Supports Termination of VMS
  - Can Receive Letter from NJDEP Indicating VMS No Longer Needs to Operate
  - Can Continue to Operate VMS at Property Owner Expense
  - Can Have VMS Decommissioned at No Cost to Property Owner



## VI INFO PACKAGE IMPORTANT CONSIDERATIONS

- Decommissioning of VMS
  - Choice of the Property Owner
  - Encouraging Property Owner to Retain VMS
  - No Unilateral Decommissioning by 3<sup>rd</sup> Party Contractors
- Community Engagement
  - Thursdays 9AM till 4PM at Borough Municipal Building
  - Follow-up Mailer with FAQs
  - July 30<sup>th</sup> Info Session on Overall Environmental Clean-up
  - Dedicated VI Session Later This Summer

**EMPHASIZE OUT-REACH TO NJDEP/EPA/CHEMOURS CONTACTS!!!!**



## Termination Process

- If a Homeowner Wants to Terminate an Existing VMS, The NJDEP/EPA **MUST** First Discuss the Issues With the Homeowner and Give Approval **BEFORE** Sampling can be Conducted.
- The Technical Procedures for Conducting the Verification Sampling are Similar to Those Outlined at:

[http://www.epa.gov/region02/waste/dupont\\_pompton/selection\\_of\\_samplingcontractor.html](http://www.epa.gov/region02/waste/dupont_pompton/selection_of_samplingcontractor.html)

- The Procedures are Modified/Augmented by the Directions Contained on the Following Slides.



## Modification to Website Sampling Approach

- The “Sample Collection Procedures Scope of Work” should refer to the NJDEP Vapor Intrusion Technical Guidance, dated March 2013.
- Canisters utilized for soil gas sampling do NOT need a residual vacuum upon sample completion. The canisters can read “0” and not be rejected. However, indoor air canisters MUST have a residual vacuum.
- Permanent sampling probes for sub-slab soil gas samples are okay & can often be utilized for future monitoring or termination activities.
- The “Private Contractor Sampling Requirements” document lists the Site-Specific Sub-Slab Soil Gas Comparison Levels and Site-Specific Indoor Air Comparison Levels for the contaminants of Concern and other VOCs. These values have been replaced by the NJDEP Vapor Intrusion Screening Levels (March 2013). The one exception to the Department’s VISLs is Trichloroethene in Indoor Air ( $2 \mu\text{g}/\text{m}^3$ ).





## Conditions for Verification Sampling

- Termination sampling is only appropriate when the source of the vapors (in this case, groundwater contamination) no longer represents a threat of vapor intrusion for a specific building. Only those buildings outside the main groundwater plume OR those building within the new plume that do not have exceedances in soil gas or indoor air are eligible for Termination sampling (**GET PERMISSION FIRST**).
- Termination sampling is appropriate for certain buildings with vapor mitigation systems, as well as those in the long-term monitoring program.



## Verification Sampling Procedures

- Termination sampling consists of the concurrent collection of two sub-slab soil gas, one indoor air, and one ambient air samples.
- Two rounds of termination sampling shall be conducted with at least one of the rounds during the heating season (November 1<sup>st</sup> through March 31<sup>st</sup>). Once the initial round of termination sampling is completed, the second round cannot be collected until the data from round one has been properly validated by the NJDEP.
- Prior to sampling for system termination, shut down the mitigation system for a period of 30-45 days to allow re-development of subsurface contaminant concentrations, if present. The mitigation system should be turned back on between sampling events to maintain the protectiveness to people in the building.
- Analytical parameters for the termination samples shall include the same COCs analyzed during the verification sampling.



## Termination of Vapor Mitigation System

- Ultimately, the NJDEP/EPA shall determine if the vapor mitigation system or long-term monitoring can be officially terminated and a determination letter issued to the property owner.
- The NJDEP/EPA will encourage those homeowners where the VI pathway has been determined to be incomplete to retain the VMS since Pompton Lakes is a Tier 1 (High Potential) for Radon.
- If the homeowner insists on having the VMS removed from their building, the 3<sup>rd</sup> Party Consultants shall submit a detailed proposal with cost estimates to USEPA for approval before commencing with the construction.