DuPont Pompton Lake Remediation Project:

CAG Project Update and RCRA Permit Modification Process

GOALS FOR TONIGHT:

- Help CAG understand the project and process for public input, selection of remedies and subsequent activities
- Help EPA understand how we can satisfy your needs

Issues To Be Addressed

- Permit process
- Objectives of the remediation
- Scope of the work
- Scheduling
- How EPA can be responsive

Why is a Permit Modification Needed?

- Original permit addressed investigation of site
- Draft Permit Modification will propose remedies
- Provides opportunity for feedback from stakeholders
- Imposes final remedies

Remediation Project Summary

- Sediments and uplands soils exceed ecological but <u>not</u> human health standards
- Remedial approach for sediment is dredging (in the wet) and restoration
- Remedial approach for upland soil is conventional excavation and restoration
- DuPont has agreed not to utilize on-site disposal as an option

Remedial Action Objectives for Pompton Lake Delta Sediment

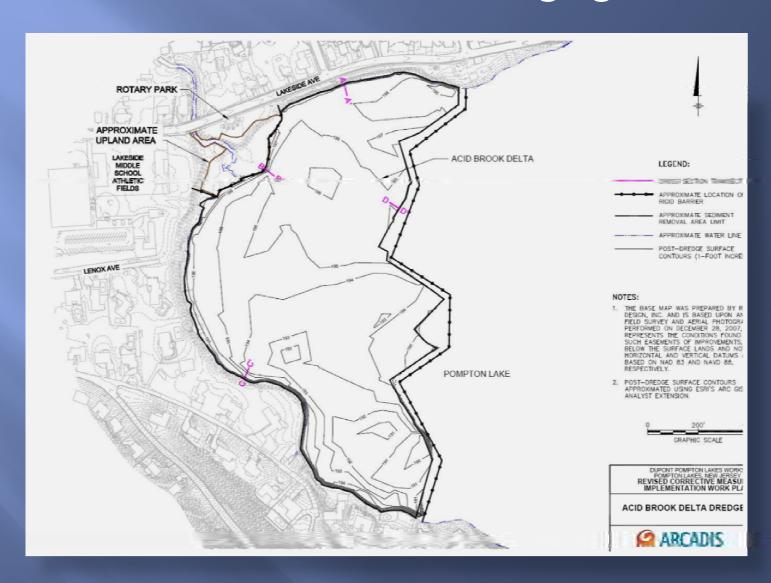
Removal of mercury-impacted sediment will:

- Reduce the potential for mercury methylation in the near-shore sediments.
- Reduce the area where organisms can be affected by exposure to elevated mercury concentrations in Lake sediments.

Current Scope of Work for Pompton Lake Delta Sediments

- Summarized in Corrective Measures
 Implementation workplan submitted in December 2010
 - Approximately 68,800 cubic yards of sediments to be removed over 26 acres
 - Rigid barriers will be installed to isolate area to be dredged to contain sediments during dredging
 - Sediments will be dredged "wet"
- Project Operations Plan to be developed by contractor
- DuPont will obtain state and local permits necessary to complete remediation

Extent of Delta Dredging



Upland Soil Remedial Action Objectives

 Removal criteria based on the lower of NJDEP Residential Direct Contact Soil Remediation Standards or ecological soil criteria

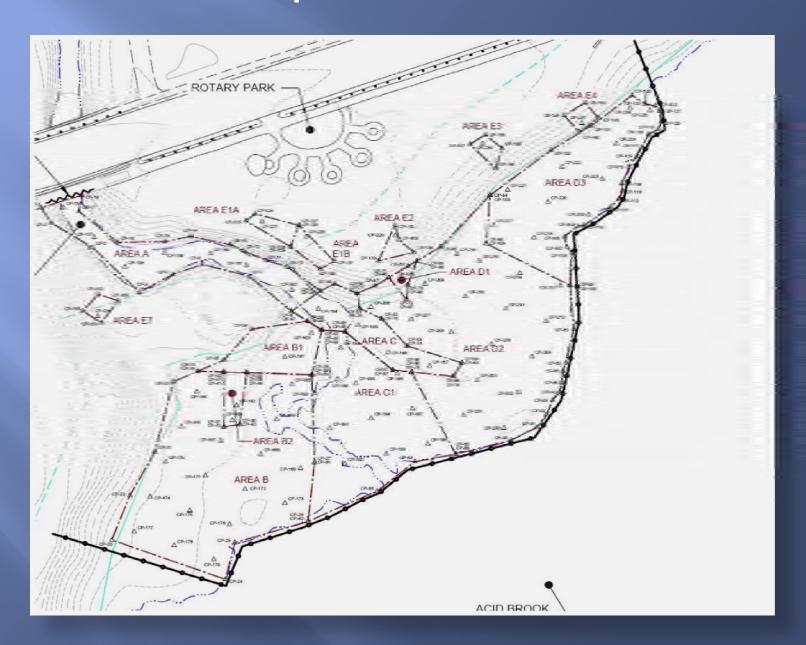
Table 2-1: Uplands RAOs and Removal Criteria

Analyte	Surface Soil Criteria (mg/kg)	Subsurface Soil Criteria (mg/kg)
Copper (Cu)	1,100	3,100
Mercury (Hg)	20.5	23
Lead (Pb)	400	400
Selenium (Se)	5.05	390
Zinc (Zn)	1,507	23,000

Current Scope of Work for Pompton Lake Upland Soil

- Summarized in Corrective Measures
 Implementation workplan submitted in December 2010
 - Approximately 7,800 cubic yards of soil removed from 17 specific areas across ~1 acre
 - Removal depths range from 0.5 to 8.5 feet
 - Excavation using conventional equipment
- DuPont required to obtain required state and local permits necessary to complete remediation

Extent of Uplands Soil Remediation



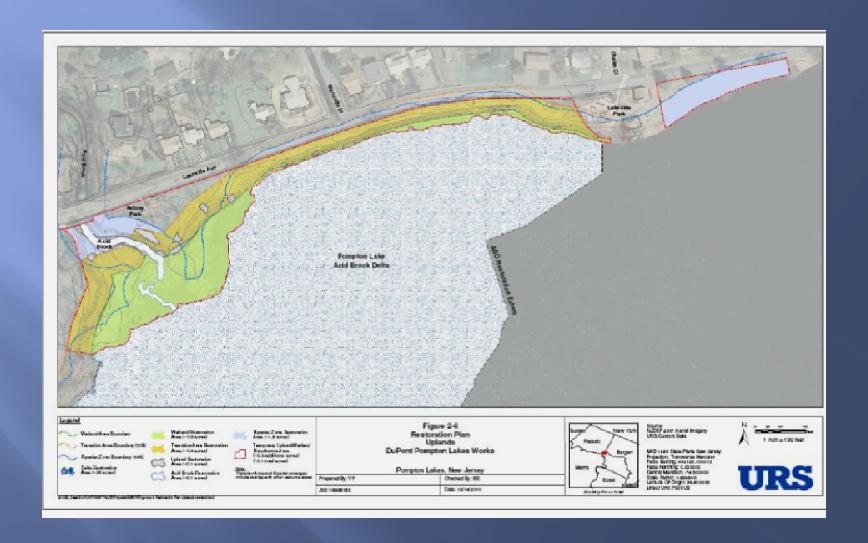
Remediation Elements to be Addressed in Project Operations Plan

- Dredging and excavation methods
- Material handling and transportation methods
- Where sediment dewatering/solidification will be completed and how
- Final disposition of sediment and soil
- Restoration details

Current Scope of Work for Restoration

- DuPont meeting with Lake Restoration Committee to identify potential restoration elements (e.g., increased public access)
- Summarized in Corrective Measures
 Implementation workplan submitted in December
 2010
 - In-kind replacement with native vegetation
 - Enhancement of aquatic habitat and wetland resources
 - Supplemental upland plantings and erosion control features

Restoration of Lake Sediment and Uplands Soil



RCRA Permit Next Steps

- March 2011: DuPont submit application for modification to RCRA Permit to complete lake remediation dredging of sediments and excavation of soil consistent with work plan
- May 2011: Public meeting/hearing to discuss status of project and proposed permit modification
- September 2011: Issuance of modification to site RCRA Permit

Project Operations Plan Next Steps

- June 2011: DuPont hires contractors
- September 2011: DuPont submits "Project Operations Plan" which includes details of dredging, containment, transport, staging, treatment, disposal, and restoration
- October-November 2011: Conduct information sessions to obtain feedback on Project Operations Plan from stakeholders
- December 2011: EPA approval of Project
 Operations Plan

How Should EPA Supplement Input Into the Permit Process?