POMPTON LAKES WORKS
PUBLIC AVAILABILITY SESSION

JULY 30, 2015
AGENDA

- Permit Transfer Status/Financial Assurance
- Pompton Lake Study Area (Acid Brook Delta/Upland Soil Areas)
- Vapor Intrusion Info Package
- Groundwater Clean-up
- On-site Soils Clean-up
- Questions
DuPont Announces Plan to Spin-off Chemical Businesses Into Chemours - Included SEC Filing

EPA Received a Request for the Transfer of the RCRA Permit From DuPont to Chemours

Chemours Owns/Operates Pompton Lakes Facility As Of July 1, 2015

EPA Processing the Request For Permit Transfer

Permit Transfer is Considered a Class I Modification
PERMIT TRANSFER - FINANCIAL ASSURANCE

- Financial Assurance Required for the Approved Corrective Measures in Final Permit Modification (Acid Brook Delta/Uplands)

- Also Required for Continued Implementation of Interim Measures (e.g. Vapor Intrusion/Groundwater)

- Chemours Provided $52M Financial Assurance In the Form of Surety Bonds Which are Being Reviewed by EPA

- Financial Assurance Documentation Being Reviewed by EPA

- DuPont Remains Responsible for Financial Assurance Until Chemours Demonstrates to EPA that it has the Required Financial Assurance
FINANCIAL ASSURANCE INFORMATION

- Pompton Lakes Study Area (Acid Brook Delta/Area A/Island Area/Uplands Soil Areas) - $42,860,000
  - Removal of Contaminated Soil/Sediment, Restoration of Lake & Uplands Soil Areas, Monitoring

- Vapor Intrusion - $4,236,000
  - Installation/O&M/Decommissioning of Vapor Mitigation Systems (VMS), Phase II Sampling Program, Reporting

- Groundwater IRM - $5,165,000
  - O&M of Existing Groundwater Extraction/Treatment System, Off-site Groundwater IRM/Pilot Studies (e.g. Bioremediation Pilot/Hydraulic Surcharging/ISCO)

- Total estimated project cost $52,261,000
“DREDGING” PERMIT CHRONOLOGY

- Proposed Permit Modification Issued November 2, 2014
- Public Information Session Held November 12, 2014
- Public Hearing Held December 8, 2014
- Public Comment Period November 3, 2014 - February 3, 2015
- 70+ Commenters Addressed in EPA’s Responsiveness Summary
- Permit Modification Became Effective June 22, 2015
“DREDGING” PROJECT OVERVIEW

- Pompton Lake Study Area
  - Acid Brook Delta (ABD) Sediments - Approx. 36 Acres
  - Pompton Lake Sediments - Lakeside Ave. Bridge to Pompton Dam
    - Area A - Approx. 0.5 Acres
    - Island Area - Approx. 2.5 Acres

- ABD Upland Soil Areas
  - Upland Soil Areas Outside Wetland/Wetland Transition Zone
  - Areas Within Wetland/Wetland Transition Zone
ABD UPLAND SOIL REMOVAL AREAS
“DREDGING” PLANNING DOCUMENTS

- Corrective Measures Implementation Work Plan (CMI WP)
  - Addresses the Following in ABD:
    - Dredging/Removal Methods
    - Materials Handling/Transportation
    - Disposal of Sediment
    - Restoration Details
    - Health & Safety Plan/Quality Assurance Plan/Reporting

- Remediation & Restoration Plan for ABD Upland Soil Areas
  - Part of CMI WP
  - Addresses Same Considerations as ABD, Above
  - Will Detail Restoration of ABD Upland Soil Areas Including Wetland/Wetland Transition Zone
NEAR-TERM SCHEDULE

- Effective Date of Final Permit: June 22, 2015

- Summer/Fall 2015: Chemours Prepares Work Plans For EPA & NJDEP Approval/Secures Fed, State, Local Permits/Procures Contractor

- Submittal of Corrective Action Implementation Work Plan: Mid-September

- Fall 2015: Initiate Work (e.g. Fencing)

- Spring 2016: Initiate Uplands Soil Areas Work With Dredging to Follow

- Potential Schedule Constraints Include: Permit Approval/Contractor Procurement
COMMUNITY ENGAGEMENT ACTIVITIES - DREDGING

- On-going EPA Availability at Municipal Building on Thursdays to Answer Questions Regarding Pompton Lakes Study Area Clean-up

- Summer/Fall 2015: Outreach to Local Officials, Stakeholder Groups, CAGs and Other Interested Parties to Solicit Feedback About Dredging

- Fall/Winter 2015: Meetings With Aforementioned Parties to Review Draft Technical Submittals and Obtain Additional Input

- Newsletters/Email Updates

- Spring 2016: Target Time to Initiate Fieldwork
VAPOR INTRUSION INFO PACKAGES
BACKGROUND

- Vapor Interim Remedial Measures Work Plan (VIRM WP) Approved in June 2008 Identified Vapor Mitigation Area & Procedures for VI Sampling/VMS Installation

- VI Comparison Levels Determined/Approved

- VI Phase 2 Program Approved November 2009

- VI Screening Levels Updated by NJDEP in March 2013
VAPOR INTRUSION INFO PACKAGES

BACKGROUND

- DuPont Requests Revision to 2008 Vapor Interim Remedial Measures Work Plan (VIRM WP) in April 2013

- NJDEP/EPA Approve Use of Updated Vapor Intrusion Screening Levels (VISLs), but do not Approve Revised VIRM WP in February 2014

- EPA/NJDEP Mail VI Info Packages on July 17, 2015 to Approximately 425 Property Owners in Vapor Mitigation Area
VI INFORMATION PACKAGE CONTENT

• Cover Letter from NJDEP/EPA Introducing VI Info Package

• Figure Depicting Original Vapor Mitigation Area & Revised Vapor Intrusion Investigation Area

• Property Worksheet - Activities Completed at the Property and Options
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

• Contact Info - Emails/Phone Numbers for EPA/NJDEP/Chemours for Interested Parties to Ask Questions
VI INFO PACKAGE
IMPORTANT CONSIDERATIONS

• Property Owners Not Required to Take Any Action (i.e. Pick an Option) if they Choose

• Property Owners in the Original Vapor Mitigation Area Are Still Eligible for VMS Installation With/Without Sampling Per 2008 VIRM WP

• EPA/NJDEP Encouraging Sampling 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
Termination Sampling

- Termination Sampling - Two Rounds With at Least one Round During Heating Season (November 1\textsuperscript{st} through March 31\textsuperscript{st})

- Prior to Termination Sampling - VMS Shut Down For 30-45 days to Allow Redevelopment of Subsurface Contaminant Concentrations, if Present

- Need to be Mindful of Timeline for Termination Sampling
VI INFO PACKAGE

IMPORTANT CONSIDERATIONS

• Termination of VMS
  • Decision to Collect Termination Samples Requires Review/Approval by NJDEP/EPA

• 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 Keep VMS but Not Operate
  • Can Have VMS Removed at No Cost to Property Owner
VI INFO PACKAGE

IMPORTANT CONSIDERATIONS

• Removal of VMS
  ➢ Choice of the Property Owner
  ➢ Encouraging Property Owner to Retain VMS For Radon Control
  ➢ No Unilateral Removal of VMS by Chemours

• Community Engagement
  ➢ Thursdays 10AM till 4PM at Borough Municipal Building
  ➢ Follow-up Mailer with FAQs
  ➢ July 30th Info Session on Overall Environmental Clean-up
  ➢ Dedicated VI Session Later This Summer
HYDRAULIC SURCHARGING PILOT STUDY

- Surveying/Geophysical Work Completed
- Geotechnical Borings to be Performed in August
- Design to be Submitted to Railroad and Then EPA/NJDEP in October/November
- Chemours Submittal of the Final Design (with Railroad’s Approval) and Permit-by-Rule (PBR) Application to EPA/NJDEP Expected December 2015
- When PBR Package Approved by NJDEP, Public Notice Issued and Opportunity for Public Hearing, if Requested Available
IN-SITU CHEMICAL OXIDATION (ISCO) PILOT STUDY

- Pilot Study Evaluating Another Technology to Address Groundwater
- ISCO Work Plan Submitted Was Reviewed/Commented by EPA/NJDEP
- Chemours Responding to EPA/NJDEP Comments on Work Plan and Procuring a Contractor to Perform Pilot Study
- Work Plan/Operations Plan Submittal Expected September/October
- Permit-by-Rule Application Submittal Expected in November Upon Work Plan Approval, Public Hearing may be Requested
ON-SITE SOILS CORRECTIVE MEASURES STUDY (CMS)

- Finalizing EPA/NJDEP CMS Comments to be Transmitted to Chemours in August/September
- Chemours to Revise CMS Based on NJDEP/EPA Comments
- Once Reviewed by EPA/NJDEP, CMS Will be Presented to Community Via Public Information Session
- Draft Permit Modification Will be Prepared With a Public Hearing/Public Comment
QUESTIONS???