UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RCRA HSWA PERMIT
E.I. DUPONT DE NEMOURS & COMPANY INCORPORATED
POMPTON LAKES, NEW JERSEY FACILITY
EPA I.D. NUMBER NJD002173946

COMPLIANCE SCHEDULE

SECTION A. SITE-WIDE SOILS REMEDIATION

ACTION AREA/DELIVERABLES EPA ACTIONS	Due Date/Milestone (Calendar Days)	COMMENTS
Eastern Manufacturing Area RFI Submittal for approval of the Eastern Manufacturing Area Soils RCRA Facility Investigation (RFI) Report. Eastern Manufacturing Area locations: North Plant: 1 - 46, 123 - 138, 152 - 161, 163, 187, 191 (75 total)/ Mid plant: 47 - 82, 104, 105, 116, 139 - 144, 162, 164 - 176, 188 - 190 (62 total)/ South plant: 83 - 103, 106, 120 - 122, 177 - 181, 183 - 185 (33 total)/ Area Wide: 118, 182, and 186 Notes: The site locations above correspond to designations by EPA and New Jersey DEP, as follows: #1-151 EPA: Solid Waste Management Units (SWMUs) NJDEP: Areas of Concern (AOCs) #152-202 EPA: Newly-identified SWMUs NJDEP: AOCs. The RFI is referred to by NJDEP as Remedial Investigation Report (RIR).	June 30, 2010	The RFI Report is required by Module III-E.3(a) of the Permit. The schedule contained herein is established by EPA pursuant to Module III-E.10(c) of the Permit. EPA and NJDEP will coordinate review of the Report. Revisions to the Report may be required pursuant to Module III-E.3(b) of the Permit; if so, the date for submittal of the revised Report will be specified by EPA.

Western Manufacturing Area RFI Submittal for approval of the Western Manufacturing Area Soils RFI Report. Western Manufacturing Area locations: 107 - 115, 119, 145 - 151, 192 – 202 Notes: The site locations above correspond to designations by EPA and New Jersey DEP, as follows: #1-151 EPA: Solid Waste Management Units (SWMUs) NJDEP: Areas of Concern (AOCs) #152-202 EPA: Newly identified SWMUs NJDEP: AOCs. The RFI is referred to by NJDEP as Remedial Investigation Report (RIR).	June 30, 2010	The RFI Report is required by Module III-E.3(a) of the Permit. The schedule contained herein is established by EPA pursuant to Module III-E.10(c) of the Permit. EPA and NJDEP will coordinate review of the Report. Revisions to the Report may be required pursuant to Module III-E.3(b) of the Permit; if so, the date for the submittal of the revised Report will be specified by EPA.
Northern Manufacturing Area RFI Submittal for approval of the Northern Manufacturing Area Soils RFI Report Northern Manufacturing Area locations: 117 and 119. Notes: The site locations above correspond to designations by EPA and New Jersey DEP, as follows: #1-151 EPA: Solid Waste Management Units (SWMUs) NJDEP: Areas of Concern (AOCs) #152-202 EPA: Newly identified SWMUs NJDEP: AOCs. The RFI is referred to by NJDEP as Remedial Investigation Report (RIR).	June 30, 2010	The RFI Report is required by Module III-E 3(a) of the Permit. The schedule contained herein is established by EPA pursuant to Module III-E.10(c) of the Permit. EPA and NJDEP will coordinate review of the Report. Revisions to the Report may be required pursuant to Module III-E.3(b) of the Permit; if so, the date for the submittal of the revised Report will be specified by EPA.

<u>EPA Actions</u> EPA approval of RFI Reports for Eastern, Western and Northern Manufacturing Areas.	EPA approval of RFI Reports as soon as practicable after submission(s).	EPA approval of RFI Reports submitted pursuant to Module III.-E.3(a) and, if necessary, E.3(b) of the Permit.
Facility Mailing List Notification Permittee to notify facility mailing list of completion and availability of RFI Report.	Within 30 days after EPA approval of RFI Report.	Notification by Permittee of facility mailing list required by Module III-E.3(c) of the Permit.
Corrective Measures Study (CMS) Final Report Submittal for approval the Corrective Measures Study (CMS) Final Report for the Eastern, Western and Northern Manufacturing Areas. <u>Note</u>: The CMS Final Report is referred to by NJDEP as the Soils Remedial Action Selection Report (RASR).	Submittal required by 90 days after EPA approval of the RFI Reports for the Eastern, Western and Northern Manufacturing Areas.	CMS Final Report is required by Module III- E.7(a) and 7(b) of the Permit. EPA and NJDEP will coordinate review. Revisions to the CMS Final Report or additional evaluation may be required pursuant to Module III-E.7(c) and/or 7(d) of the Permit; if so, the date for submittal of a revised Report will be specified by EPA.

EPA Actions EPA approval of the CMS Final Report submissions and selection of proposed remedies for the Eastern, Western and Northern Manufacturing Areas; preparation of proposed Permit Modification; public comment period on proposed Permit Modification; Responsiveness Summary; final decision on proposed Permit modification.	EPA actions commence as soon as practicable after CMS submissions.	EPA actions pursuant to Module III-E.8 and E.9 of the Permit
Soils Corrective Measures Implementation (CMI) Work Plan Submittal for EPA approval of the Soils Corrective Measures Implementation (CMI) Work Plan, including an implementation schedule, for the Eastern, Western and Northern Manufacturing Areas. Note: The CMI Work Plan is referred to by NJDEP as the Soils Remedial Action Work Plan (RAWP)	270 days after EPA approval of CMS Report, unless Permittee provides justification acceptable to EPA for longer period. (As of March 29, 2010, Permittee estimated 365 days required).	Permit Modification for the selection of soils remedies will include requirements for the CMI Work Plan, including an implementation schedule. EPA and NJDEP will coordinate review. Revisions to the Work Plan and implementation schedule may be required; if so, the date for submittal of a revised Work Plan and implementation schedule will be specified by EPA.

EPA Actions EPA approval of CMI Work Plans, including implementation schedule, for the Eastern, Western and Northern Manufacturing Areas.	EPA approvals of CMI Work Plan, including implementation schedule as soon as practicable after submissions	EPA approvals pursuant to Module III- E.9(a) of the Permit or as specified in the Permit following its Modification.
Implement EPA Approved Soils Corrective Measures (CMI) Work Plans Complete final soils remediation for the Eastern, Western and Northern Manufacturing Areas in accordance with the CMI Work Plan and implementation schedule, as approved by EPA. Note: The CMI is referred to by NJDEP as Soils Remedial Action Implementation.	Start work upon receipt of EPA approval of CMI Work Plan and implementation schedule. As of March 29, 2010, Permittee estimated approximately three (3) years to complete soils remediation work.	Implementation of the remedies selected pursuant to Module III- E.(9) of the Permit and any applicable requirements of the Permit following its Modification.

Implement Site Restoration for the Eastern, Western and Northern Manufacturing Areas : Completion of site restoration for the Eastern, Western and Northern Manufacturing Areas in accordance with CMI Work Plans and implementation schedules, as approved by EPA.	As of March 29, 2010, Permittee estimated 365 days to complete site restoration for the Eastern, Western and Northern Manufacturing areas, following completion of soils remediation.	Implementation of the remedies selected pursuant to Module III- E.(9) of the Permit and any applicable requirements of the Permit following its Modification.
Submittal of the Site-wide Soils CMI Report The site-wide soils CMI Report to include all work performed in the Eastern, Western and Northern Manufacturing Areas. Note: The Site-wide Soils CMI Report is referred to by NJDEP as the Site-wide Soils Remedial Action Report (RAR).	As of March 29, 2010, Permittee estimated submission of the CMI Report 180 days after completion of site restoration.	Report on implementation of the remedies selected pursuant to Module III-E.(9) of the Permit and any applicable requirements of the Permit following its Modification. EPA and NJDEP to coordinate review of the Report. Revisions to the Report may be required; if so, the date for submittal of the revised Report will be specified by EPA.

SECTION B. POMPTON LAKE DELTA

ACTION AREA/DELIVERABLES EPA ACTIONS	Due Date/Milestone (Calendar Days)	COMMENTS
Pompton Lake Delta Remediation The Pompton Lake Delta area requires remediation because of migration of contamination from the DuPont facility. Submittal for approval of the Corrective Measure Implementation (CMI) Work Plan, including an implementation schedule for the work. Notes: (1) A RCRA Facility Investigation (RFI) and a Corrective Measures Study (CMS) Final Report have previously been submitted to NJDEP and EPA. (2) The RFI is referred to by NJDEP as a Remedial Investigation Report (RIR); the CMS Final Report is referred to by NJDEP as the Soils Remedial Action Selection Report (RASR). (3) The CMI Work Plan is referred to by NJDEP as the Remedial Action Work Plan (RAWP).	June 30, 2010	The Pompton Lake Delta contamination and need for remediation have been identified pursuant to Module III-D. of the Permit. The CMI Work Plan, including an implementation schedule, to be incorporated in a proposed Permit Modification. EPA and NJDEP will coordinate review. Revisions to the CMI Work Plan and its implementation schedule may be required; if so, a date for submittal of the revised CMI Work Plan and its implementation schedule will be specified by EPA.

EPA ACTIONS EPA approval of previous RFI Report and CMS Final Report submissions and selection of proposed remedy for the Pompton Lake Delta; EPA approval of CMI Work Plan and implementation schedule; preparation of proposed Permit Modification; public comment period on proposed Permit Modification; Responsiveness Summary; final decision on proposed Permit Modification.	EPA actions commence as soon as practicable after CMI Work Plan submittal.	EPA actions pursuant to Module III-E.(8) and E.(9) of the Permit.
Implement Remediation of Pompton Lake Delta Permittee to complete additional design studies; prepare and obtain necessary state and local permits; implement site preparation, including establishing sediment handling areas and trucking routes; perform required removal work.	Permittee to start work on receipt of EPA notification after Permit Modification approval. As of March 29, 2010, Permittee estimated approximately 3 years and 9 months to complete Pompton Lake remedial work, including time required for design work and obtaining necessary state and local permits.	Implementation of the remedies selected pursuant to Module III-E.(8) and E.(9) of the Permit and any applicable requirements of the Permit following its modification.

Demobilization/Restoration Activities; Submittal of the Pompton Lake Delta CMI Report The CMI Report to include all work performed in the Pompton Lake Delta area. Note: The CMI report is referred to by NJDEP as the Remedial Action Report.	As of March 29, 2010, Permittee estimated approximately 18 months required to complete site restoration and demobilization and submit CMI Report.	A CMI Report for the Pompton Lake Delta is required by Module III-E.(9) of the Permit and any applicable requirements of the Permit following its modification. EPA and NJDEP to coordinate review. Revisions to the CMI Report may be required; if so, the date for submittal of the revised Report will be specified by EPA.

SECTION C. WANAQUE RIVER

Wanaque River RFI The Wanaque River requires further investigation because of migration of contamination from the DuPont facility. Submittal for EPA approval of a RCRA facility investigation (RFI) Report for the Wanaque River. Note: The RFI Report is referred to by NJDEP as the Remedial Investigation Report (RIR).	July 31, 2010	The elements of the RFI Report are described in Module III-E.3(a) of the Permit. EPA and NJDEP to coordinate review. Revisions to the RFI Report may be required pursuant to Module III-E.3(b) of the Permit; if so, the date for submittal of the revised Report will be specified by EPA.
Facility Mailing List Notification Permittee to notify facility mailing list of completion and availability of the RFI Report.	Within 30 days after EPA approval of the RFI Report.	Notification of facility mailing list required by Module III-E.3(c) of the Permit.
Wanaque River – Additional Studies And Actions Future studies and actions may be required for the Wanaque River, based on the results of the RFI.	To be determined	A CMS Plan and/or CMS Report may be required pursuant to Module III-E.(5)- E.(7) of the Permit; if corrective measures are required, EPA and Permittee will proceed pursuant to Module III E.(8) and E.(9) of the Permit.

SECTION D. INTERIM MEASURES --- GROUND WATER REMEDIATION

Interim Measures **Ground Water Remediation** Permittee to carry out a Pilot Study of ground water remediation, including field characterization, to evaluate techniques for treating the ground water contamination from the DuPont facility.		
Field Characterization/Pilot Study concept design Work Plan submitted for approval to EPA.	Completed and submitted to EPA.	The Pilot Study is being carried out pursuant to Module III-B.6(b) and Module III-E.4 of the Permit. EPA and NJDEP have coordinated review. Revisions to the Field Characterization/Pilot Study concept design Work Plan Characterization Study are underway by Permittee.
Submittal for EPA approval of a revised Field Characterization/Pilot Study concept design Work Plan.	By May 1, 2010	The Field Characterization/Pilot Study concept design Work Plan is required pursuant to Module III-B.6(b) and Module III-E.4 of the Permit.
EPA Action EPA approval of the revised Field Characterization Pilot Study concept design Work Plan, including the IRM Field Characterization Study.	As soon as practicable after submittal of the revised Field Characterization/Pilot Study concept design Work Plan.	EPA approval of the revised Field Characterization/Pilot Study concept design Work Plan pursuant to Module III-B.6(b) and Module III-E.4 of the Permit.

Field Characterization Implementation; Final Pilot Study Work Plan Submittal Implement Field Characterization Study, including data evaluation. Submittal for EPA approval a Final Pilot Study Work Plan.	By November 10, 2010. By November 10, 2010.	EPA and NJDEP to coordinate review. EPA and NJDEP to coordinate review. Revisions to the Final Pilot Study Work Plan may be required; if so, the date for submittal of a revised Final Pilot Study Work Plan will be specified by EPA.
<u>EPA Action</u> EPA approval of Final Pilot Study Work Plan.	As soon as practicable after submittal of the Final Pilot Study Work Plan or revised Final Pilot Study Work Plan.	EPA approval of the Final Pilot Study Work Plan or revised Final Pilot Study Work Plan pursuant to Module III-B.6(b) and Module III-E.4 of the Permit.
Pilot Study Implementation; Final Report Permittee to conduct Pilot Study and prepare Pilot Study Report.	As of March 29, 2010, Permittee estimated approximately 18 months to complete Pilot Study implementation and complete Pilot Study Report.	Implementation of The Pilot Study and preparation of the Pilot Study Report to be carried out pursuant to Module III B.6(b) and Module III-E.4 of the Permit.

SECTION E. INTERIM MEASURES --- VAPOR INTRUSION MITIGATION

Vapor Intrusion Investigative Report Vapor intrusion of hazardous chlorinated volatile organic compounds resulted from a plume of contaminated ground water that has migrated from the DuPont facility, and impacted or potentially impacted residences located above the plume. Vapor Intrusion Investigative Report submitted to EPA.	June 30, 2010	The Vapor Intrusion Investigative Report is required by Module III B.6(b) and Module III-E.4 of the Permit. EPA and NJDEP to coordinate review. Revisions to the Report may be required; if so, a date for submittal of the revised Report will be specified by EPA.
Vapor Intrusion Report The IRM Report to contain data on remediation system installations for the residences impacted by vapor intrusion, and other relevant information and recommendations. Vapor Intrusion Interim Remedial Measures (IRM) Report submitted to EPA.	Permittee to submit IRM Report by December 31, 2010	The Vapor IRM Report is required pursuant to Module III B.6(b) and Module III-E.4 of the Permit. EPA and NJDEP to coordinate review. Revisions to the Report may be required; if so, a date for submittal of the revised Report will be specified by EPA.

Vapor System Installations In Affected Residences As of April 15, 2010, 439 affected residences have been identified.		
Vapor System Installation Complete	176 as of April 15, 2010	
Timetable requirements for Vapor System installations in additional residences for which DuPont is managing the installation process.	98 additional affected residences* to have vapor systems installed by December 1, 2010. (* less any residences which deny access or cancel DuPont management of the design/installation process).	Vapor system installations required as interim remedial measures pursuant to Module III-B.(6)(b) and Module III-E.4 of the Permit.

Progress Reports On Vapor System Installations Permittee to submit monthly Progress Reports on Vapor System Installations in affected residences.	By the 10th day of each month.	Progress Reports required pursuant to Module III-B.(6)(b) and Module III-E.4 of the Permit.
Progress Reports on Additional Delineation of Expanded Impact Area Permittee is required to conduct additional delineation of the expanded impact area boundary (pursuant to the approved Deep Soil Gas Sampling Work Plan, which is part of the vapor intrusion investigation), where access to homes to conduct sub-slab sampling has been denied.	By the 10th day of each month.	Progress Reports required pursuant to Module III-B.(6)(b) and Module III-E.4 of the Permit.
On-going Vapor System Activity for Additional Residences. Vapor System activities for 165 affected residences for which owners have not agreed to participate, or declined to have DuPont manage the Vapor System design/installation process or have not responded. Outreach and technical assistance will continue on an on-going basis. (Annual notification will be provided to any residents who refuse systems or do not respond.)	Scheduling of system design/installation for the165 residences to be determined on a case-by-case basis.	Interim Measures for vapor mitigation systems required pursuant to Module III-B.6(b) and Module III-E.4 of the Permit.