



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

October 19, 2018

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 – 3rd Quarter 2018
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 3rd Quarter 2018 Progress Report covering activities during July 1, 2018 through September 30, 2018.

If you have any questions, please contact me at (973) 492-7733.

Sincerely,

A handwritten signature in black ink that reads "David E. Epps". The signature is written in a cursive, flowing style.

David E. Epps, P.G.
Project Director, Pompton Lakes Works
Corporate Remediation Group

cc: Perry Katz – USEPA Region II
Ed Merrill – Borough of Pompton Lakes Environmental Officer
Kevin Boyle – Borough of Pompton Lakes Borough Administrator
PLW Central File

Attachments (1)

3rd Quarter 2018 Progress Report
Pompton Lakes Works Site
Pompton Lakes, New Jersey

1.0 Activities Scheduled

Onsite Soils

- Remedial Design
 - Await further discussion with USEPA and NJDEP after their full review of the response to comments package on the CMS.

Onsite Groundwater

- Remedial Investigation
 - Address comments, if any, on the *Response to Comments - Draft Onsite Groundwater Bedrock Investigation Work Plan* submitted on June 6, 2018.
- Remedial Design/Pilot Study
 - Submit technical memorandum with results of ISCO design testing program and proposed path forward.
- 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 2nd Quarter 2018 GWETS operating/monitoring reports.

Offsite Groundwater

- Remedial Design
 - Hydraulic surcharging pilot study
 - Assist NJDEP, as needed, on follow-up to public hearing.
- Remedial Action
 - Vapor Intrusion:
 - Continue implementation of the VIRMWP.
 - Hold status calls with NJDEP/USEPA, as needed.
 - Talk with residents, as needed.
 - Address comments, if any, on the *2017~2018 VI O&M Report* submitted on April 13, 2018.

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 CEA – Biennial Certification* submitted on April 30, 2018.

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.
- Address comments, if any, on the *Final Technical Memorandum – Proposed Revised Removal Area for Uplands Area A1* submitted on August 25, 2016.
- Address comments, if any, on the *Final Technical Memorandum – Change in Dredge Conditions Plan – Acid Brook Delta* submitted on October 3, 2017.
- Continue implementation of the remedy including the following activities:
 - Continue routine inspections of the site and work areas in accordance with approved permits and safety conditions,
 - Complete placement of eco-layer material in ABD and Island Area.
 - Complete restoration activities at Island Area, Uplands, Acid Brook, and along ABD shoreline.
 - Continue demobilization of equipment from project site.

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
 - USEPA and NJDEP were still completing their full review of the response to comments package on the CMS; no discussions were held.

Onsite Groundwater

- Remedial Investigation
 - Received approval on the *Response to Comments - Draft Onsite Groundwater Bedrock Investigation Work Plan*.
- Remedial Design/Pilot Study
 - Submitted technical memorandum with results of ISCO design testing program and proposed path forward.
- Remedial Action
 - MW-107R
 - No activities planned or conducted.
 - 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 2nd Quarter 2018 GWETS operating/monitoring reports.

Offsite Groundwater

- Remedial Design
 - Hydraulic surcharging pilot study
 - NJDEP did not request any assistance in response to the public meeting.

- Remedial Action
 - Vapor Intrusion:
 - Continued implementation of the VIRMWP.
 - Held status calls with NJDEP/USEPA and talked with residents, as needed.
 - Received approval on the *2017-2018 VI O&M Report*.
 - Completed design drawing for one property and obtained property owner approval.
 - Submitted Remedial Measure Report for one property.

Groundwater Compliance Monitoring Program

- No comments have been received to date on the *2014 Annual Groundwater Report*.
- No comments have been received to date on the *2015 Annual Groundwater Report*.
- Received comments on the *2018 CEA – Biennial Certification* and provided revisions to the CEA package to NJDEP/USEPA. Subsequently, received approval of the revised package.
- Received approval for the NJPDES Discharge to Groundwater Permit renewal request.

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*.
- Approval was received on the *Final Technical Memorandum – Proposed Revised Removal Area for Uplands Area A1*.
- Approval was received on the *Final Technical Memorandum – Change in Dredge Conditions Plan – Acid Brook Delta*.
- Continued implementation of the remedy including the following activities:
 - Continued routine inspections of the site and work areas in accordance with approved permits and safety conditions.
 - Completed placement of eco-layer material in ABD and Island Area.
 - Completed restoration activities at Island Area, Uplands, Acid Brook, and along ABD shoreline. Activities remaining include piezometer and live stake installation during fourth quarter as well as ongoing inspections of the restoration areas.
 - Completed demobilization of equipment from project site.

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
July 17, 2018	2 nd Qtr. 2018 Site-wide Progress Report
July 17, 2018	2 nd Qtr. 2018 GWET Operating Summary
August 28, 2018	2018 CEA Biennial Certification – Response to Comments
August 30, 2018	Draft Tech Memo – Onsite Groundwater Design Testing Results

9.0 Activities Scheduled for Next Reporting Period (4th Quarter 2018)

Onsite Soils

- Remedial Design
 - Await further discussion with USEPA and NJDEP after their full review of the response to comments package on the CMS.

Onsite Groundwater

- Remedial Investigation
 - Begin preparations to initiate the bedrock investigation program.
- Remedial Design/Pilot Study
 - Address comments, if any, on the Draft Technical Memorandum – Onsite Groundwater Design Testing Results submitted on August 30, 2018.
- 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 3rd Quarter 2018 GWETS operating/monitoring reports.

Offsite Groundwater

- Remedial Design
 - Hydraulic surcharging pilot study
 - Assist NJDEP, as needed, on follow-up to public hearing.

- Remedial Action
 - Vapor Intrusion:
 - 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.
- Conduct semi-annual 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:
 - Piezometer installation for measurement of surface water during Spring 2019 (in accordance with NJDEP permits);
 - Live stake installation; and
 - Ongoing inspections of the restoration areas.
- Begin preparation of 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.

Schedule of Regulatory-Required Deliverables for Site

Submission Timeline	Deliverable Type
October 31, 2018	3 rd Qtr. 2018 GWET Operating Summary
October 31, 2018	3 rd Qtr. 2018 Site-wide Progress Report

Schedule of Anticipated Field Activities for Site

Date of Activity	Field Activity Description
Oct/Nov/Dec 2018	System influent and effluent sampling
November 2018	Water level measurements
November 2018	Semi-annual groundwater sampling event