

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



POMPTON LAKES WORKS PUBLIC AVAILABILITY SESSION

JULY 30, 2015



8/4/2015



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



PERMIT TRANSFER - DUPONT TO CHEMOURS

- 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



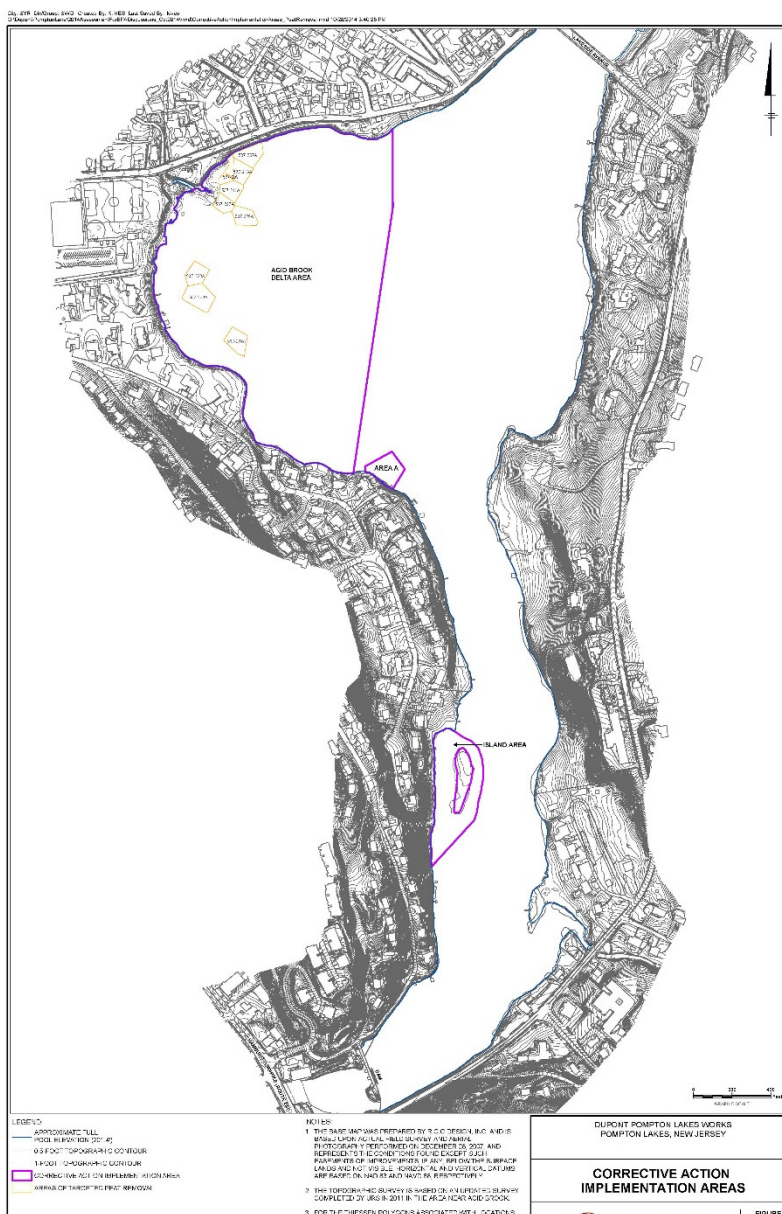
“DREDGING” PROJECT OVERVIEW

- 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



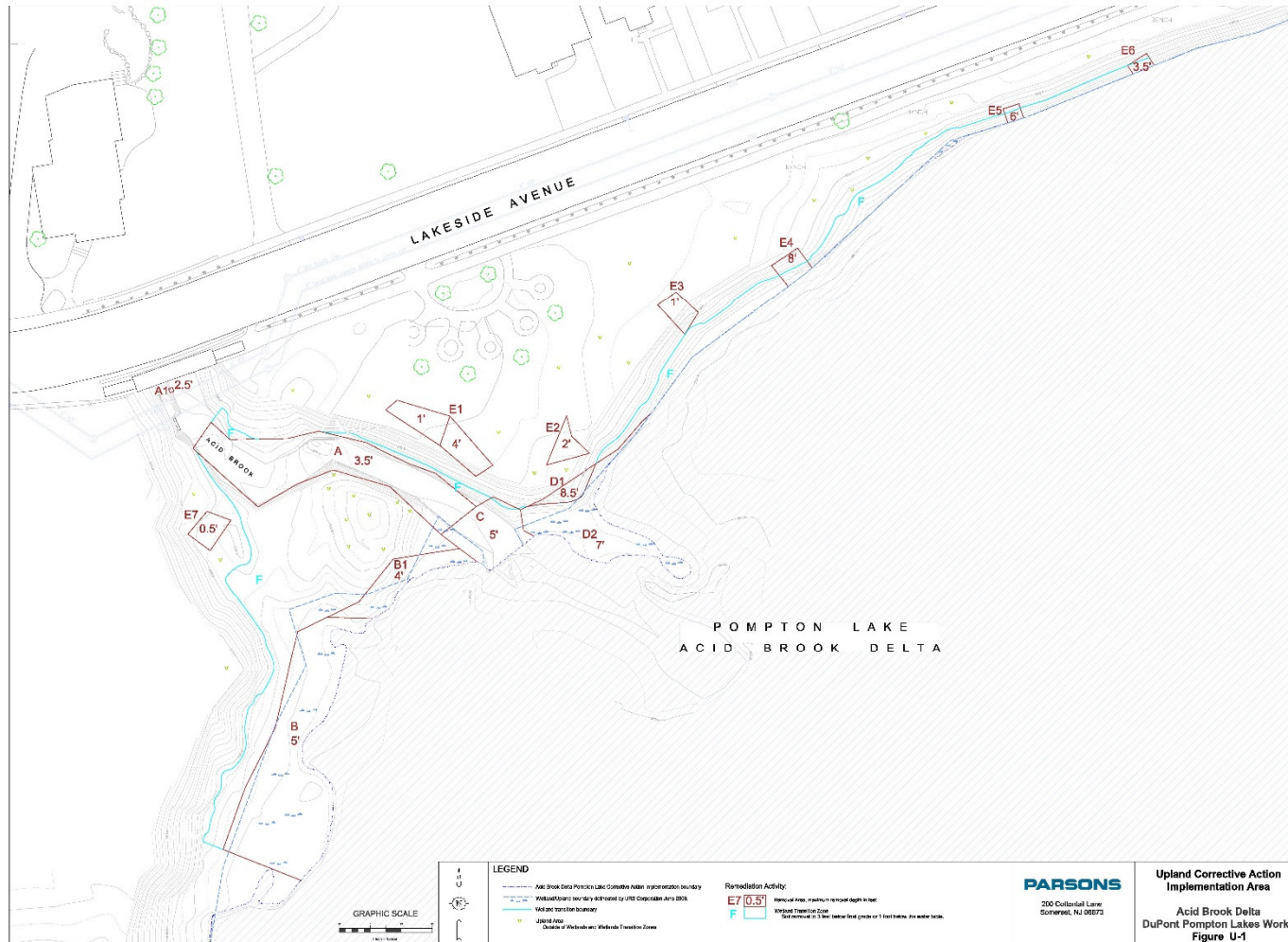
CORRECTIVE ACTION IMPLEMENTATION AREA



8/4/2015



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

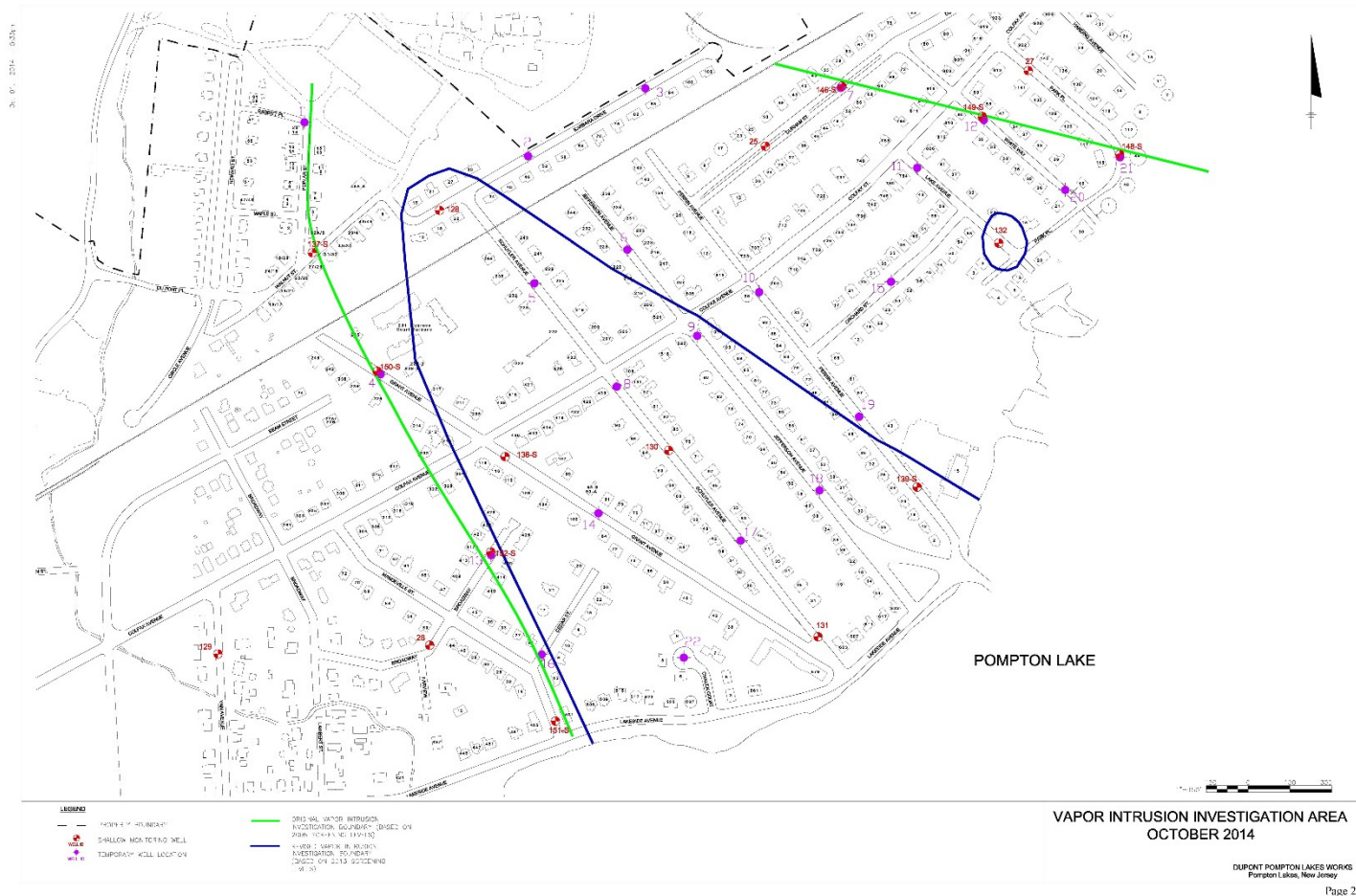


VAPOR INTRUSION INFO PACKAGES BACKGROUND

- 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 INVESTIGATION AREA - 2014





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 1st through March 31st)
- 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???