



Dupont Pompton Lakes Works Site Cleanup Newsletter

JUNE 2015

Welcome to the latest edition of the U.S. Environmental Protection Agency's (EPA) DuPont Pompton Lakes Works Newsletter. EPA issues this communication to keep the community informed of the cleanup activities related to the DuPont Pompton Lakes Works Site.

Acid Brook Delta & Lake Cleanup Update:

EPA issued a draft permit modification on November 2, 2014 for the Acid Brook Delta and Pompton Lake (described as the Pompton Lake Study Area in the draft permit modification). The study area is defined as Pompton Lake from the Lakeside Avenue Bridge to the Pompton Dam including the Acid Brook Delta as well as the Upland Soil Areas of Acid Brook.

EPA held an information session at the Carnevale Center on November 12, 2014 and presented the components of the draft permit modification. On December 8, 2014, EPA held a public hearing at the Carnevale Center where approximately 22 individuals representing themselves and/or local interest groups expressed their concerns.

A public comment period for interested parties to provide written comments was held. The original public comment period was from November 3, 2014 until December 18, 2014, but was extended until February 3, 2015 at the request of two interest groups.

In summary, the proposed environmental cleanup for the Pompton Lake Study Area includes:

- Dredging of mercury impacted sediment from the Acid Brook Delta. This area encompasses approximately 36 acres.

Reminder: Weekly EPA "Open Hours"
Pompton Lakes Municipal Building
Thursdays, 10 a.m. – 4 p.m.

- Removal of mercury impacted sediment that was identified outside the Acid Brook Delta between the Lakeside Avenue Bridge and the Pompton Dam. Two specific areas were identified and delineated as needing corrective action. One area is designated "Area A" and covers approximately 0.5 acres and the second area is designated the "Island Area" and covers about 2.5 acres.
- Implementation of a Long-Term Monitoring Program to establish baseline conditions and conduct long-term monitoring of the Pompton Lake Study Area. The long-term monitoring program work plan will be designed to measure key indicators of the overall condition of the study area over an initial five year monitoring period.

Additional Resources:

EPA Pompton Lakes website: www.epa.gov/region2/waste/dupont_pompton

New Jersey Department of Environmental Protection: www.state.nj.us/dep/srp/community/sites/dupont_pompton_lakes



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- Design and performance of an updated Ecological Risk Assessment, if determined to be needed. The performance of an Ecological Risk Assessment, if done, will be based on the evaluation of the empirical data collected as part of the implementation of the long-term monitoring program as well as relevant historical data, and would utilize updated risk data, bioaccumulation factors, and relevant collected site-specific information.
- Design and implementation of a revised Upland Soil Areas Remediation and Restoration Plan which ensures the potential pathways for ecological receptors to mercury contaminated soil are addressed.



EPA evaluated and prepared responses to written comments submitted by approximately 71 individuals, three public interest groups, the United States Fish and Wildlife Service and DuPont. EPA's responses to the written comments were compiled in a document called a Responsiveness Summary.

EPA issued the permit modification, including the Responsiveness Summary on May 20, 2015. Following the required 30-day period during which an appeal to the permit could have been filed (no appeals were filed), the permit modification became effective on June 22, 2015.

Within 90 days of the June 22nd effective date, or by such other date approved by EPA, the Permittee shall submit to EPA and New Jersey Department of Environmental Protection (NJDEP) for their review and approval by EPA, a Corrective Measures Implementation Work Plan, including a Project Operations Plan, Health & Safety Plan and Quality Assurance Project Plan with respect to the dredging/removal operation. The EPA approved work plan will incorporate any modifications resulting from EPA and NJDEP reviews.

Upon EPA approval of the updated work plan, the Permittee shall implement the approved work plan in accordance with its schedule and the provisions of the Permit Modification.

EPA has committed to the Pompton Lakes community that as part of its on-going community engagement process, EPA will review with, and obtain input from interested parties, on documents and work plans submitted prior to their final review/approval by EPA. These documents are related, but not limited to project implementation areas such as air monitoring, traffic control, noise control, and health and safety.

Field implementation of the corrective measures is anticipated to begin in late 2015.

Additional Resources:

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Vapor Intrusion Program Update:

In mid-July, the EPA will mail correspondence to residents and property owners whose homes are located in the vapor mitigation area (above the contaminated shallow groundwater plume) to provide a comprehensive update on the vapor intrusion program. More than 400 residence-specific information packages have been prepared by EPA, the NJDEP and DuPont for distribution.

The information package will include:

1. Guidance sheet – summary of information in the mailing
2. Map – depiction of the original vapor intrusion investigation boundary based on the 2008 groundwater vapor intrusion screening levels and the revised boundary based on the 2013 NJDEP screening levels
3. Property worksheet – list of activities that have been completed at your property under the NJDEP and EPA approved work plans
4. Data tables – relevant data for your property
5. Option details – detailed explanation of the testing and/or mitigation options available for your property
6. Contact information – who to contact at the EPA, NJDEP and DuPont to further discuss your options under the vapor intrusion program being implemented by DuPont with oversight by NJDEP and EPA.

A summary of the options available regarding sampling, vapor mitigation system installation, vapor mitigation system termination and long-term monitoring for the property will be provided in the information package sent to homeowners in the vapor mitigation area. These options are consistent with DuPont's current vapor intrusion program and/or NJDEP's Vapor Intrusion Guidance. This will allow the property owner to make their own informed decision regarding participation in the vapor intrusion program.

EPA and NJDEP understand that the information package may appear complicated and therefore, encourage residents who receive it (or anyone with questions about the vapor intrusion program) to reach out to the contacts provided in this newsletter or the information package.

Although the Vapor Intrusion Screening Levels have changed, there have been no changes to DuPont's 2008 Vapor Interim Remedial Measures Work Plan that allows for a vapor mitigation system to be installed at any property located in the vapor mitigation area (i.e. above shallow groundwater contamination) associated with the DuPont Pompton Lakes Works site.

It is important to emphasize three points regarding the vapor intrusion program. First, while the current vapor intrusion program allows for a vapor mitigation system to be installed at any property located above the shallow groundwater contamination associated with the DuPont Pompton Lakes Works site, NJDEP and EPA encourage that sampling be performed in order for you to make the most informed decision about the need for a vapor mitigation system.

Additional Resources:

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New Jersey Department of Environmental Protection: www.state.nj.us/dep/srp/community/sites/dupont_pompton_lakes



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Second, the ability of the homeowner to receive a letter of no further action at your property from NJDEP with respect to vapor intrusion would be based on sampling in accordance with the NJDEP VI Guidance and third, you should understand that decisions made about vapor mitigation system installation or termination go through the process of review and approval/disapproval by NJDEP and EPA.

DuPont Spin-off of Chemours:

The Chemours Company

In December 2014, DuPont announced plans to spin off a portion of its chemicals business into a new entity named The Chemours Company. Along with the announcement, Chemours filed an initial Form 10 registration statement with the U.S. Securities and Exchange Commission which included business, market and financial information. According to its Form 10 filing, Chemours will be a provider of performance chemicals. Chemours chemical products are used in a variety of industrial processes.

Permit Modification & Permit Transfer

On May 20, 2015, the EPA issued the permit modification, including the Responsiveness Summary, which contained EPA responses to comments received during the public comment period. The permit modification addressed the Acid Brook Delta and Pompton Lake Study Area (described as the Pompton Lake Study Area in the permit modification). The required 30 day period during which a formal appeal could be filed with

EPA's Environmental Appeals Board ended on June 22, 2015 with no appeals filed. The permit is final and DuPont has begun to initiate its requirements (further described below).

EPA is processing a request for transfer of the facility's Resource Conservation and Recovery Act (RCRA) permit from DuPont to The Chemours Company FC LLC, to be effective as of July 1, 2015 after the Chemours Company becomes an independent company. The Chemours Company FC LLC will own and operate the Pompton Lakes facility.

Cleanup Cost Estimate & Financial Assurance

With the proposed permit modification final, the Permittee is required to provide financial assurance for the approved corrective measures included in the final permit modification, and for continued implementation of interim measures by July 22, 2015. Financial assurance for the cleanup work will be based on a cost estimate for the required work, including post remediation care requirements, and will identify and implement the method the Permittee selects to provide the assurance.

New Jersey also requires financial assurance for corrective measures at the DuPont Pompton Lakes facility under their existing Administrative Consent Order ("ACO"). New Jersey has added Chemours to their ACO, specifying its obligation to provide financial assurance for the corrective work at the Pompton Lakes facility. In connection with its financial filing with New Jersey, DuPont reported that as of April 1, 2014 it had expended \$218,717,018 on remedial measures and investigative activities at the Pompton Lakes site.

Additional Resources:

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Community Outreach:

The NJDEP and EPA are available to the community to answer any questions regarding the changes to the NJDEP Vapor Intrusion Screening Levels, other aspects of the vapor intrusion program, or the other components of the environmental cleanup. Once the information packages are distributed, EPA, NJDEP and DuPont plan to be available to individuals or groups to discuss the content of the information packages and answer any questions.

In addition to the newsletter, the EPA holds regular public information sessions and provides weekly "Open Hours" in the Pompton Lakes Municipal Building (Thursdays from 10 a.m. till 4 p.m.) where people can drop by, ask questions and get information in person. If residents prefer not to come to the Municipal Building, EPA personnel are willing to meet at other locations.

The NJDEP and EPA will continue to provide oversight of DuPont's vapor intrusion program to ensure protection of public health and the environment in the Pompton Lakes community. Vapor mitigation systems have been installed in 330 homes to date. The EPA and NJDEP continue to encourage all homeowners with homes above the "vapor mitigation area" (the contaminated shallow groundwater plume) to test their homes to determine the need for the installation of a vapor mitigation system. If you would like DuPont to install the vapor mitigation system, please contact David Epps, DuPont Project Director, at 973-492-7703. If you would like a third party contractor to install the system, please call Pat Seppi, the EPA's Community Involvement Coordinator, at 646-369-0068.

Site Background:

From 1902-1994, DuPont manufactured explosives on a 570-acre site located at 2000 Cannonball Road in Pompton Lakes and Wanaque, New Jersey. Past operations and waste management practices have contaminated surface water, soil, sediment and groundwater both on- and off-site. The primary soil and sediment contaminants are lead, mercury and copper. Primary groundwater contaminants are volatile organic compounds (VOCs) which can cause vapor intrusion in areas where the shallow groundwater VOC plume extends beneath homes.

The DuPont Pompton Lakes Works site is regulated under the federal Resource Conservation and Recovery Act (RCRA).

For More Information, Please Contact:
Pat Seppi, Community Involvement
Coordinator
U.S. EPA
(646) 369-0068
seppi.pat@epa.gov

Additional Resources:

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