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

October 3, 2016

Ms. Jehan Halim
New Jersey Department of Environmental Protection
Division of Water Quailty
401 East State Street
P.O. Box 420
Trenton, New Jersey 08625-0420

RE: **Treatment Works Approval 16-0162**
The Chemours Company FC, LLC
Pompton Lake Study Area Corrective Measures
Pompton Lakes Borough, Passaic County

Dear Ms. Halim:

This letter is to request confirmation that a permit modification is not required for the Treatment Works Approval (TWA) No. 16-0162 at The Chemours Company FC, LLC (Chemours) Pompton Lake Study Area Uplands Water Treatment Plant.

Due to variance in the influent water, modifications to the water treatment plant at the PLSA project are necessary to remove soluble mercury, copper and Total Organic Carbon (TOC) prior the discharge. The treatment plant designer and operator, Sevenson Environmental Services, Inc. (Sevenson), has conducted additional treatability studies to address these constituents and concluded that chemical addition to the existing treatment plant will be necessary prior to filtration.

Proposed Modifications

The original, approved Upland water treatment plant (see Attachment 1 for the process flow diagram) uses filtration to remove solids prior to discharge. The modifications proposed for the remediation project discharge include increased filtration and chemical addition that will be necessary for the remediation project discharge to meet regulatory limits established by the applicable permit(s). The modified Upland water treatment process flow diagram is included in Attachment 2.

As per N.J.A.C. 7:14A-22.4(a)7, chemical addition does not require modification of the TWA permit when the purpose is for improving treatment plant performance. A request of approval for the chemical addition was submitted to the NJDEP Bureau of Surface Water Monitoring as part of the Category BGR – General Remediation Clean-up Permit Authorization (NJPDES Permit No. NJG0251534) for the project.

Chemical addition will be initiated inline prior to the 20,000 gallon tanks contained in the approved TWA permit. The tank will be isolated when full and solids present will be allowed to settle and removed. Note that this mode of operation of the tanks with solids removal was previously described in the Uplands portion of the Operation and Maintenance Manual submitted with the original TWA application.

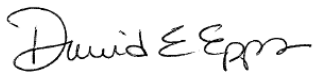
Water from the tank will be pumped through the filtration step consisting of the two approved bag filters (operating in series as compared to parallel in original drawing) flowing from 1-micron bags through 0.5-micron bags. Sevenson will add a 0.35-micron cartridge filter downstream of the two bag filters, for even finer filtration of solids prior to discharge. Conversion of the filters within parallel and addition of a cartridge filter is minor in nature and does not significantly change the layout or operation of the treatment system. The addition of a cartridge filter to the filtration step does not change the calculation on the Form DWR-175 already submitted with the original TWA application.

As shown on Attachment 2, two effluent holding tanks are being used to accumulate water from the remediation project. These tanks will allow for the evaluation of the discharge against permitted effluent limits prior to discharge. The effluent holding tanks are not part of the overall treatment process. This storage was included in the approved permit (see optional 75,000 gallon storage tank on Attachment 1) and will be operated using three 20,000 gallon storage tanks (1 influent storage tank and 2 effluent holding tanks).

Based on the information presented above and in accordance with the applicable regulations, we are requesting confirmation that the process system described above is consistent with the existing TWA permit and as such modification of the approved permit is not needed. We would appreciate an expeditious determination so that we may proceed as proposed, as the remediation project is ongoing and water is currently being stored onsite to ensure that the appropriate effluent limitation are meet prior to discharge.

Please contact me at (973) 492-7703 or Alicia Lyding at (973) 492-7702 if you should have any questions regarding this package.

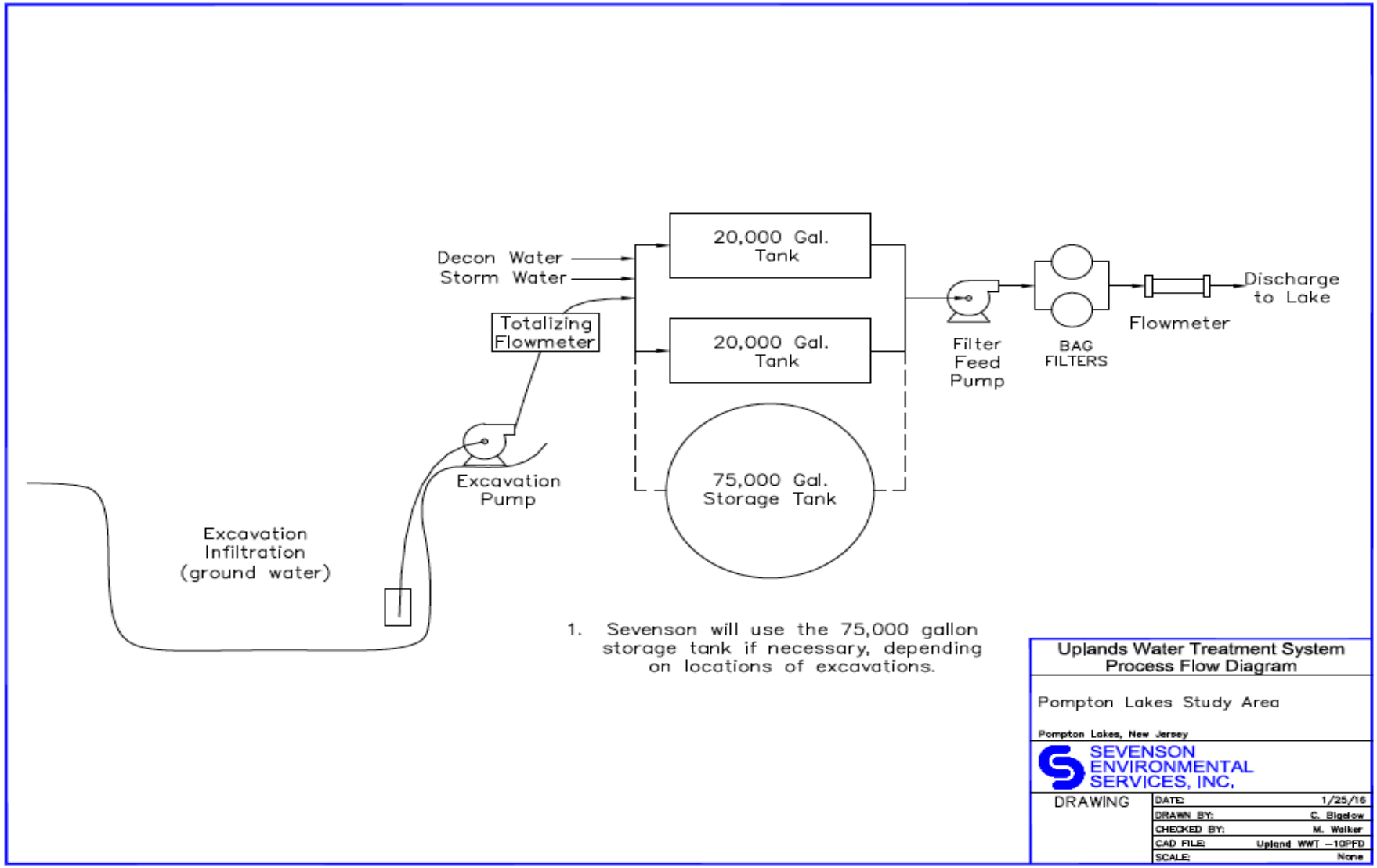
Sincerely,



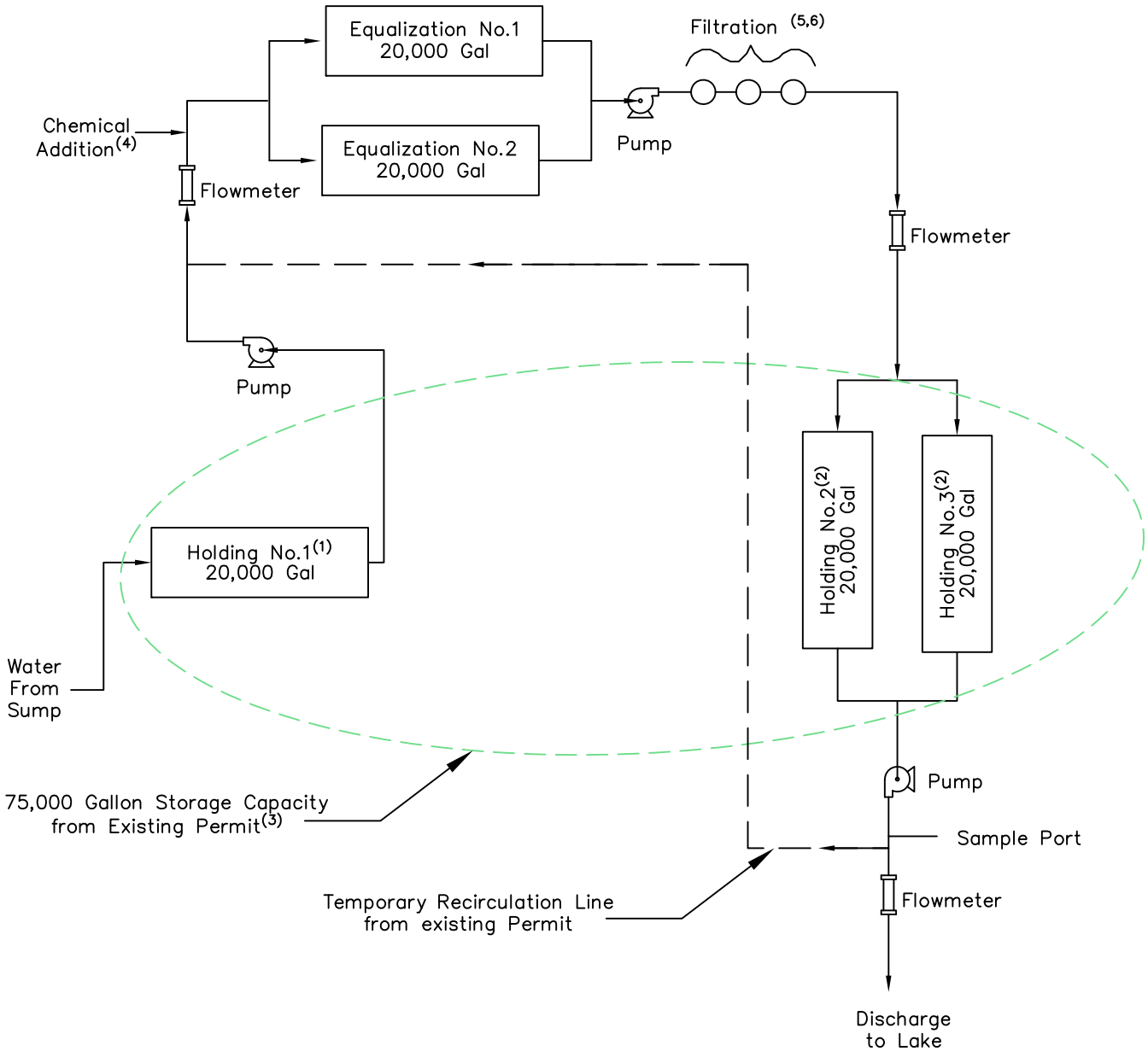
David E. Epps, P.G.
Project Director, Pompton Lakes Works
Corporate Remediation Group

Cc: PLW Central file
Alicia Lyding, HDR
Anthony Cinque, NJDEP
John Maselli, NJDEP
Perry Katz, USEPA

Attachment 1 – Original, Approved Uplands Water Treatment Plant Process Flow Diagram



Attachment 2 – Proposed Modified Uplands Water Treatment Plant Process Flow Diagram



Notes:

1. Holding Tank No. 1 will be used to accumulate water (both process and rain)
2. Holding Tanks No.2 and No.3 will be used to accumulate treated water for sampling prior to discharge and are not part of the overall treatment process
3. The overall storage (holding capacity) has not changed as the 75,000 gallon tank in approved permit has been replaced with three 20,000 gallon tanks.
4. Chemical addition is addressed per regulation in BGR Permit
5. Filtration includes bags approved in existing permit with additional cartridge filter
6. Scoring on Form DWR-175 does not change for process shown above

Uplands Water Treatment System
Process Flow Diagram

Pompton Lakes Study Area

Pompton Lakes, New Jersey

SEVENSON ENVIRONMENTAL SERVICES, INC.

DRAWING 10B

DATE:	9/29/16
DRAWN BY:	
CHECKED BY:	M.J. Crystal
CAD FILE:	Upland WWT–10B
SCALE:	None