



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C HEIDI GREYHER
DIRECTOR

May 15, 2017

Mr. Sathya Yalvigi
The Chemours Company FC, LLC
Corporate Remediation Group
974 Centre Road
Chestnut Run Plaza 715-218
Wilmington, DE 19805

Dear Mr. Yalvigi:

**SUBJECT: Conditional Approval of the April 2015 Sampling and Analysis Plan;
Chemours-Montague; MID 000 809 640**

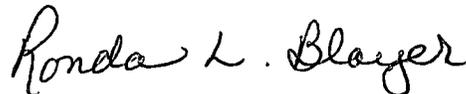
The Michigan Department of Environmental Quality (MDEQ), Waste Management and Radiological Protection Division (WMRPD) has reviewed Chemours-Montague's (Chemours) April 24, 2015, "Proposed Revision to Monitoring Program" (Plan). The Plan was received on April 24, 2015, via e-mail. Under the current monitoring program, Chemours collects 114 groundwater samples from various monitoring wells each year. AECOM, on behalf of Chemours, contracted Locus Technologies to evaluate the current monitoring program through the application of the Simplified Long-Term Monitoring Optimization (SLTMO) tool. The SLTMO tool application results suggested a reduced sampling program. Based on AECOM's assessment of the results, the quantity of groundwater samples to be collected was decreased to 40 proposed samples per year. The MDEQ evaluated AECOM's proposed well schedule for coverage both spatially and programmatically. Based upon the MDEQ's evaluation and adjustments for frequency at specific wells, the MDEQ hereby approves a groundwater monitoring schedule of 51.5 wells per year, based on certain wells going to a biennial (once every two years) frequency. Specifically:

1. The mixing zone compliance wells may have a reduced frequency of sampling, from quarterly to semi-annually.
2. Wells interior to the plume and within the capture zone may be sampled biennially, provided that the interceptor wells continue to operate as designed and the system is maintained to allow a consistent operation.
3. The monitoring program proposed by AECOM suggested eliminating four wells from the sampling program. The MDEQ concurs with eliminating two of the four wells. MW-214-060 shall be maintained as a plume definition well. MW-250-054, located near the Pierson Creek Landfill, shall remain on its current schedule until the hydrologic conditions at this waste management unit are better understood.

Please be advised that this approval does not take into account the future outcome of the investigation in the Pierson Creek area. As such, those investigative results may impact the monitoring program.

If you have any questions, please contact Mr. Dale Bridgford, Geologist Specialist, at 517-582-3050; bridgfordd@michigan.gov; or MDEQ, WMRPD, P.O. Box 30241, Lansing, Michigan 48909-7741, or you may contact me.

Sincerely,



Ronda L. Blayer
Environmental Engineering Specialist
Hazardous Waste Section
Waste Management and Radiological
Protection Division
517-284-6555

cc: Mr. Fred Sellers, MDEQ
Mr. David Slayton, MDEQ
Mr. Dale Bridgford, MDEQ
Mr. Clay Spencer, MDEQ
Corrective Action File

**Chemours Montague SAP Revision
MID 000 809 640**

Location_ID	Current_Sampling_Frequency	AECOM Recommendation	AECOM Proposed Annual	DEQ Recommendation	DEQ Annual	Comment Number
MW-214-060	Semi-Annual	Dropped	0	Annual	1	1
IW-06-140	Semi-Annual	Annual	1	Annual	1	2
IW-08-142	Semi-Annual	Annual	1	Annual	1	2
IW-07-144	Semi-Annual	Annual	1	Annual	1	2
IW-05-112	Semi-Annual	Annual	1	Annual	1	2
MW-220-060	Semi-Annual	Annual	1	Annual	1	2
MW-595-125	Semi-Annual	Annual	1	Annual	1	2
MW-OCT-001-130	Semi-Annual	Annual	1	Annual	1	2
MW-251-072	Semi-Annual	Annual	1	Annual	1	2
MW-224-060	Semi-Annual	Annual	1	Annual	1	2
MW-212-120	Semi-Annual	Annual	1	Biennial	0.5	3
MW-211-080	Semi-Annual	Annual	1	Biennial	0.5	3
MW-211-060	Semi-Annual	Annual	1	Biennial	0.5	3
MW-210-120	Semi-Annual	Annual	1	Biennial	0.5	3
MW-210-080	Semi-Annual	Annual	1	Biennial	0.5	3
MW-206-080	Semi-Annual	Annual	1	Biennial	0.5	3
MW-206-040	Semi-Annual	Annual	1	Biennial	0.5	3
MW-302-130	Semi-Annual	Annual	1	Biennial	0.5	3
MW-301-125	Semi-Annual	Annual	1	Biennial	0.5	3
MW-201-125	Semi-Annual	Annual	1	Biennial	0.5	3
MW-226-120	Semi-Annual	Annual	1	Biennial	0.5	3
MW-303-125	Semi-Annual	Annual	1	Biennial	0.5	3
MW-304-123	Semi-Annual	Annual	1	Biennial	0.5	3
MW-305-135	Semi-Annual	Annual	1	Biennial	0.5	3
MW-229-125	Semi-Annual	Annual	1	Biennial	0.5	3
MW-225-060	Semi-Annual	Dropped	0	Drop	0	2
MW-228-080	Semi-Annual	Dropped	0	Drop	0	2
MW-LSD-002-127	Quarterly	Annual	1	Semi-Annual	2	4
MW-LSD-002-080	Quarterly	Annual	1	Semi-Annual	2	4
MW-LSD-001-130	Quarterly	Annual	1	Semi-Annual	2	4
MW-LSD-001-080	Quarterly	Annual	1	Semi-Annual	2	4
MW-LSD-003-124	Quarterly	Annual	1	Semi-Annual	2	4
MW-LSD-003-080	Quarterly	Annual	1	Semi-Annual	2	4
MW-WLP-001-125	Semi-Annual	Annual	1	Semi-Annual	2	4
MW-208-020	Semi-Annual	Annual	1	Semi-Annual	2	5
MW-250-054	Semi-Annual	Annual	1	Semi-Annual	2	5
PCL-006-077	Semi-Annual	Dropped	0	Semi-Annual	2	5
MW-WLP-005-100	Quarterly	Annual	1	Semi-Annual	2	6
MW-WLP-004-105	Quarterly	Annual	1	Semi-Annual	2	4
MW-WLP-002-085	Quarterly	Annual	1	Semi-Annual	2	4
MW-WLP-002-145	Quarterly	Annual	1	Semi-Annual	2	4
MW-WLP-003-080	Quarterly	Annual	1	Semi-Annual	2	4
MW-WLP-003-120	Quarterly	Annual	1	Semi-Annual	2	4
MW-WLP-004-070	Quarterly	Annual	1	Semi-Annual	2	4
			40		51.5	

COMMENTS:	
1	This location needs to be evaluated for coverage, is there any CPT/analytical data from greater depths:
2	Agree
3	Core of Plume, MDEQ would be OK with Biennial provided all other controls remain in place (mixing zone, purge well operations remain as they are designed, etc.
4	Mixing Zone Compliance can reduce frequency to Semi-Annual
5	Due to ongoing investigation at PC, no reduction in frequency until PC is understood adequately
6	Near Mixing Zone, reduce frequency to Semi-Annual