

White Lake Environmental Network

UPDATE ON CORRECTIVE ACTION AT THE CHEMOURS-MONTAGUE FACILITY

November 12, 2015



Corrective Action Process

- **Assessment of release history and conditions - (RFA)**
- **Investigation of waste management units (WMUs) and areas of concern (AOCs) - RFI**
- **Evaluation of corrective measures - CMS**
- **Implementation of corrective measures for desired land use utilizing environmental protection standards authorized by the U.S. Environmental Protection Agency - CMI**

WMUs/AOCs – Corrective Action Done

- Former PCB spill area
- Former hazardous waste storage area
- Former flammable hazardous waste storage area
- Former injection well
- Air stripper condensate area
- Hydrogen chloride storage tanks
- East railcar un/loading area
- West railcar un/loading area*
- Waste neoprene landfill
- Basin sludge storage area
- Bury pit landfill

WMUs/AOCs – In Progress

- **Pierson Creek landfill**
- **NPDES impoundments and corrosive treatment tanks**
- **Northeast landfill**
- **North landfill**
- **Calcium fluoride basin**
- **Lime pile**
- **Mirror Lake**

Pierson Creek (PC) Landfill (PCL)

- 11/9/15 – Results of 10/2015 PCL investigations received by DEQ
- 10/28/15 – RAT meeting on PCL-related work; conduct 1 additional boring/sampling location between PGP-1 and incomplete attempt at PGP-2. Facility advised of recommendation.
- 10/5/15 – Additional PCL-related work begins; CPT-01 with 8 samples from 66.5'-105'
- 9/10/15 – CA750 achieved via preliminary mixing zone for PCL
 - 7/2015 – DEQ advised PCL-related work planned for 7/2015 delayed; no start date available
- 6/1/15 – Modified PC area CPT groundwater sampling program approved, 2 sampling locations
- 5/19/15 – Proposed PC area CPT groundwater sampling program letter received, begin 7/2015
- 2/26/15 – DEQ letter regarding need for additional sampling associated with PCL sent
- 11/19/14 – RAT meeting on PCL work
- 10/30/14 – Completed review of 2014 RI Report
- 8/12/14 – WLPAC letter regarding questions on PCL submitted
- 7/30/14 – Call on 2014 RFI report submitted
- 5/27/14 – RFI Report - Addendum No. 2 supplemental investigation – PCL area submitted
- 9/24/13 – CA725 completed
- 7/15/13 – Supplemental investigation work plan, including PCL-related work, approved
 - 7/2/12 – Draft RFI report for 2010-2011 investigations submitted
 - 3/1/12 – Call on 2010-2011 investigations covering work in prioritization document
- 10/2010 – 9 monitoring wells near PC sampled
- 11/17/06 – Prioritization of WMUs and AOCs document submitted

Pierson Creek (PC) Landfill (PCL)

2/26/15 - DEQ letter regarding need for additional sampling associated with PCL sent.

Intervening conference call with DuPont to discuss investigation strategy

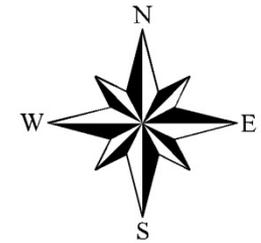
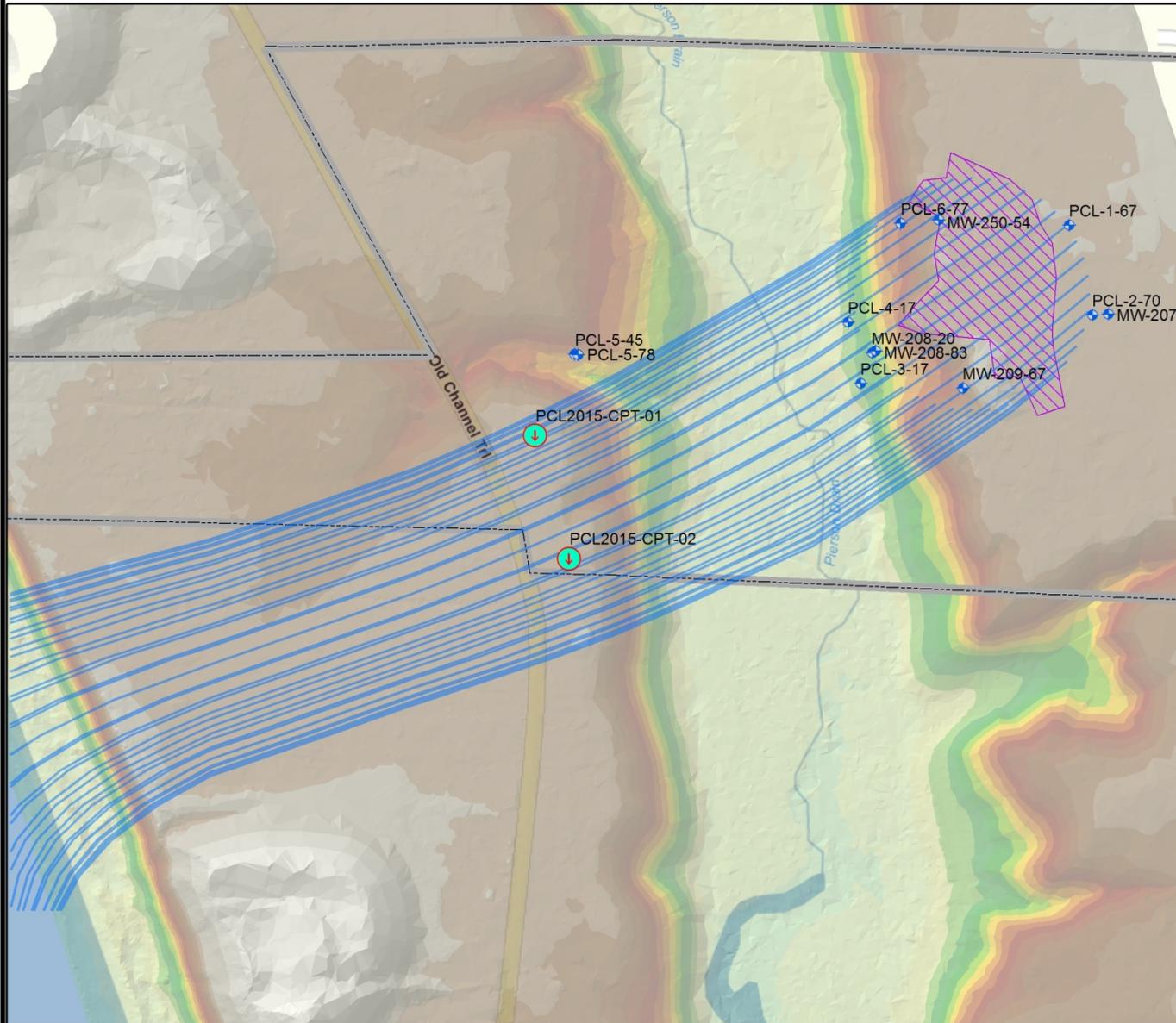
Investigate west of PC to determine if impacted groundwater fully discharges to the creek

If there is no evidence of the plume west of PC, further delineate plume extent (vertical and horizontal) at the base of the slope on east side of PC.

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6/1/15 - Modified PC area CPT groundwater sampling program approved, 2 sampling locations

Chemours Pierson Creek Landfill



Legend

- Monitor Wells
- 2015 CPT Borings
- Very Generalized GW Flow Path
- 1978 Landfill Outline



OWMRP Office of Waste Management and Radiological Protection
Hazardous Waste Section
Permit & Corrective Action Unit
Map Drawn 11/12/2015 by DRB

Future Work

- Wrap up PCL investigation and complete CMS/CMI
- Establish and enter into an enforceable document, consent order or long-term agreement
- Complete corrective action process for remaining six WMUs/AOCs
- Continue to make pertinent documents available to public via DEQ website: http://www.michigan.gov/deq/0,4561,7-135-3312_4118_4240-241452--,00.html
- Conduct public participation on site-wide CMI approach prior to final decision

DEQ

Office of Waste Management and Radiological Protection

Contacts:

Ronda Blayer

blayerr@michigan.gov

517-284-6555

Dale Bridgford

bridgfordd@michigan.gov

517-284-6556

Clay Spencer

spencerc@michigan.gov

517-284-6572