

WASTE MANAGEMENT UNIT (WMU) AND AREA OF CONCERN (AOC) CORRECTIVE ACTION STATUS TABLE
CHEMOURS – MONTAGUE
August 21, 2108

WMU/AOC	RFI COMMENTS	Done	OVERALL CA COMMENTS
1. Former PCB spill area	NA	Yes	Cleaned up to applicable cleanup criteria. Documentation and approved by DEQ. No restrictions.
2. Former HW storage area	NA	Yes	Closed per applicable cleanup criteria. 1/7/00 closure certification acceptance letter. No restrictions.
3. Former flammable HW storage area	NA	Yes	Closed per applicable cleanup criteria. 1/7/00 closure certification acceptance letter. No restrictions.
4. Former injection well	NA	Yes	Closed 1982 per applicable state proper well abandonment regulations. With respect to Parts 111 and 201, no further action required at this time (NFA).
5. Air stripper condensate area	NA	Yes	No releases. Condition of WMU indicates NFA. No restrictions.
6. Hydrogen chloride storage tanks	NA	Yes	2 tank farms, 10 tanks total. 10 soil samples, 1 duplicate. Average pH ~8.1 in neutral soil. NFA. No restrictions.
7. East railcar un/loading area	NA	Yes	2 parameters = acetaldehyde and 2-(2-butoxyethoxy) ethanol (CAS 112-34-5), aka DGME. Soil samples all non-detect (ND) at method detection limits (MDL). MDLs < residential soil criteria. MDLs < concentrations ([]s) at which soil leaching likely to result in []s > applicable groundwater (GW) criteria. No GW investigation required. NFA. No restrictions.
8. West railcar un/loading area	NA	No+	Soil meets residential criteria, only GW is of concern. GW subject to pump and treat system (P&T). Usage restriction not yet recorded on deed but required. Get cross-section of GW plume along long axis from former plant site to White Lake shoreline, which includes iso []s of 3 main parameters of concern. Final site-wide approval to address P&T performance and shutdown criteria and protocol.
9. Waste neoprene landfill	5/23/13	Yes+	Remaining issue to be addressed as part of corrective measures implementation (CMI) is 2 [Cu]s > statewide default background standards. Review write up in CA File.
10. Basin sludge area	5/23/13	Yes+	2 remaining issues: [Cl] 990,000 ug/kg > residential/nonresidential DHC of 500,000 ug/kg and the presence of rubber/fabric debris at various locations/depths within unit. Review write up in CA File.
11. Bury Pit landfill	NA	Yes+	Supplemental report 6/2/14. Residual []s < residential criteria in soil and GW samples. Competent clay layer under landfill at ~100'. Waste in place requires dig and deed restrictions.
12. Pierson Creek landfill			Following the installation of a well cluster within the GW flow path on the Lake Michigan side of Pierson Creek, east of N. Old Channel Trail, preliminary indications are that GW from Pierson Creek landfill is discharging to Pierson Creek at concentrations that would be allowable if a mixing zone (MZ) were pursued by Chemours. This preliminary MZ screening was conducted in 2015.
13. NPDES impoundments and corrosive treatment tanks	Treated wastewater (WW) to NPDES pipe. Untreated WW to impoundments via concrete, wood-lined ditch. Ditch suggested in Appendix J? Page 27 of draft report refers to Table 5, in work plan not report. Testing of soils under ditch or impoundments? S3TM -> 9 samples in impoundment area, number of samples under ditch depends on construction along its length.		GW from area captured by P&T system. May/may not be partial source of GW contamination. More information to assess. No former NPDES violations. Add outfall pipe on map from beginning to end. <i>Pipe integrity and condition of discharge area? Basis of NPDES parameters and []s? In past, pipe used as disposal sewer, and if there were any cracks, contaminants could have leaked into soil and made their way to GW. Are there monitoring wells in the western area down gradient from the soils under the pipe (other than 3 immediately west of landfill)? Video documentation of visual inspection of pipe where it is exposed and entire length of interior. Look at soil and GW conditions along entire length. Inventory all past industrial discharge points and confirm these pipes have been properly plugged or removed. Look at vent pipes for NPDES outfall near Pierson Creek.</i>

**WASTE MANAGEMENT UNIT (WMU) AND AREA OF CONCERN (AOC) CORRECTIVE ACTION STATUS TABLE
CHEMOURS – MONTAGUE**

August 21, 2108

14. Northeast landfill	Soil with no obvious waste?		Within existing P&T system capture area.
15. North Landfill	Cu? V source?		Majority within P&T system capture area.
16. CaF ₂ basin	As? More data?		<i>Analyze samples for As in addition to fluoride.</i>
17. Lime pile			<i>Leachate/GW contain elevated [Js of radon or other radium decay, possibly originating from geochemical association of radium with calcium in the sedimentary formations that were the ultimate source of the calcium carbonate calcine to produce the lime used in the calcium carbide production. Possible radiological survey? Thiocyanate – no screening level?</i>
18. Mirror Lake	pH, lime sediment thickness, volume, only surface samples?		<i>Effect of lime deposits in northern 1/3 of lake on animal and aquatic plant species?</i>

NOTES: “CA Done” means cleaned up to applicable regulations/cleanup category, either unrestricted use or with controls if not unrestricted use.

Italicized text in “Overall CA Comments” field are public comments to consider.

“+” means tasks to be completed in CMI phase of CA.

Compare all data to both residential and nonresidential criteria.

DRAFT