



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

February 26, 2015

Mr. Thomas E. Stilley, P.E.
Project Director
DuPont Corporate Remediation Group
3700 Sandpiper Road, Suite A-123
Virginia Beach, Virginia 23456

Dear Mr. Stilley:

SUBJECT: Corrective Action for Pierson Creek Landfill; DuPont-Montague (DuPont);
MID 000 809 640

This letter is in follow up to the January 27, 2015, conference call between the Michigan Department of Environmental Quality (MDEQ), Office of Waste Management and Radiological Protection (OWMRP), DuPont, and DuPont's consultant in which we discussed the MDEQ's review of the May 24, 2014, "Remedial Investigation Report Addendum No. 2 - Pierson Creek Landfill Area" (Report).

As noted during the call, with the exception of soil boring 2013SBPC-01 and MW-250-60, the logs for the soil borings and wells associated with Pierson Creek Landfill lacked detail. In an attempt to use the assets available, DuPont agreed with the MDEQ's suggestion to gamma log the existing wells in order to gain some additional insight into the lithology in the area. However, due to the use of bentonite in the grouting of the wells, there was significant shielding that attenuated the lithologic information in the gamma log. The 2013 gamma logging activities did not yield that anticipated detail.

Lacking sufficient geological detail to aid in determining whether all of the impacted groundwater discharges to Pierson Creek, or if a portion of the impacted groundwater underflows the Creek and discharges to Lake Michigan, the regional sink, further investigation is warranted. The first phase of the subsequent investigation is to determine if there is any evidence of the impacted groundwater west of Pierson Creek. Utilizing the PCL-5 series wells and the two boring locations identified on the enclosed map, these locations should provide adequate coverage to demonstrate whether the impacted groundwater extends past Pierson Creek. Use of either of the following two approaches would be acceptable in making this determination:

1. Conduct vertical aquifer sampling from the water table to the base of the aquifer on a five-foot interval. If the analytical results indicate Pierson Creek Landfill constituents, then wells will need to be installed.
2. Install a multiple screened well, with screens at tenfoot intervals. The concept is shown on the second enclosures. If there are detections of Pierson Creek Landfill constituents, the wells will be in place for future monitoring.

A written report regarding the investigation and its results shall be submitted to the OWMRP within 60 days of completion of the associated field work. The results of this investigation will dictate what, if any, additional investigations will be necessary with respect to Pierson Creek Landfill.

If you have any questions, please contact Mr. Dale Bridgford, Senior Geologist, Hazardous Waste Section, at 517-284-6556, bridgfordd@michigan.gov; or MDEQ, OWMRP, P.O. Box 30241, Lansing, Michigan 48909-7741; or you may contact me.

Sincerely,



Ronda L. Blayer
Environmental Engineering Specialist
Office of Waste Management and
Radiological Protection
517-284-6555

Enclosures

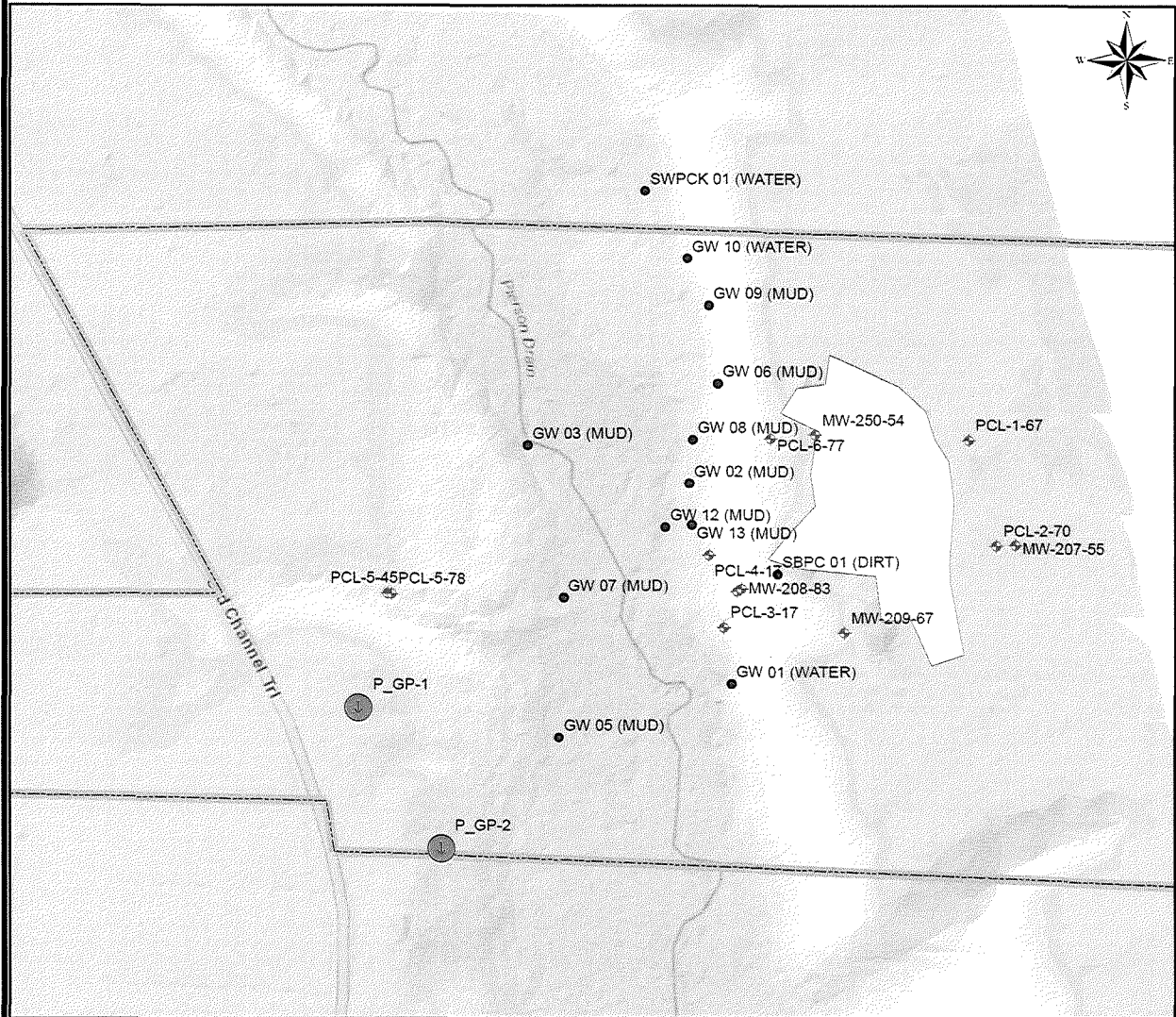
cc/enc: Mr. Sathya Yalvigi, The Chemours Company FC, LLC

Mr. Jack Schinderle, MDEQ

Mr. Dale Bridgford/Mr. Clay Spencer, MDEQ

Corrective Action File

DuPont - Pierson Creek Landfill Investigation

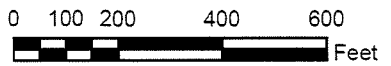



Legend

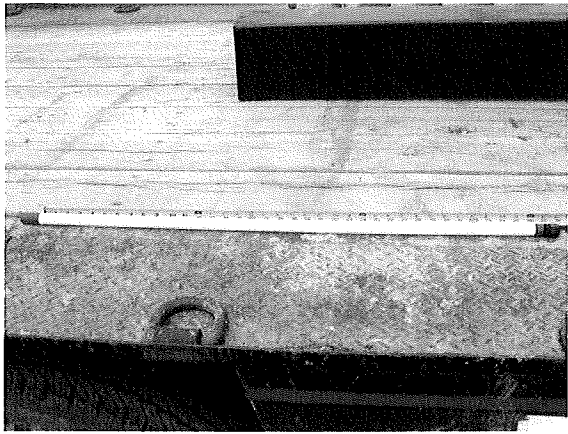
- ⊕ CPT Boring Location
 - ⊙ Domestic Wells
 - ⊕ Interceptor Wells
 - ⊕ MZ Compliance Wells
 - ⊕ Monitor Wells
 - ⊕ Piezometer
 - ⊕ Other CPT Borings
 - ⊕ Prop GP/Well
 - ⊕ Staff Gauge
 - ⊕ Survey Control
- Data percentage: 10.5

Elevation

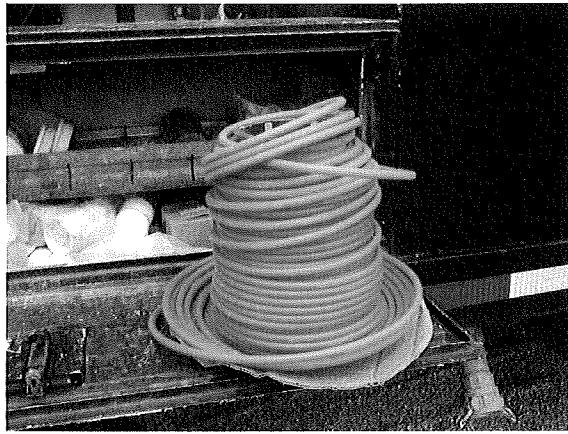
- 900 - 2000
- 800 - 900
- 675 - 800
- 650 - 675
- 645 - 650
- 640 - 645
- 635 - 640
- 630 - 635
- 625 - 630
- 620 - 625
- 615 - 620
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- 595 - 600
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- 575 - 580
- 515.613 - 575



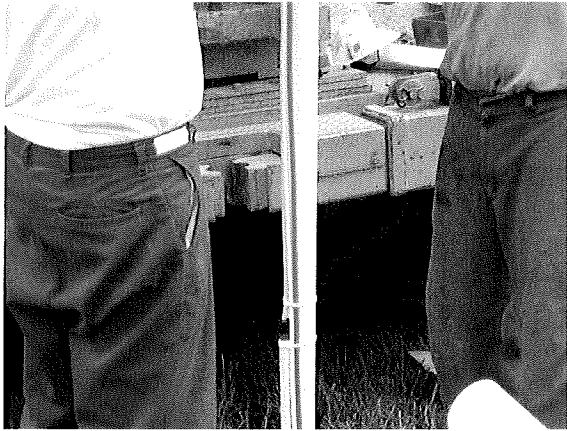

Office of Waste Management and Radiological Protection
Hazardous Waste Section
Permit & Corrective Action Unit
 Map Drawn 02/10/2015 by DRB



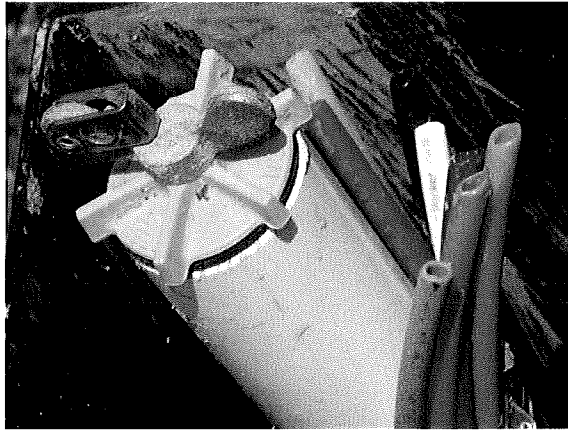
Three Foot Screen; ½ inch ID



Color-Coded Tubing



Screens and tubing zip-tied,
2 inch screen at base



Finished wellhead; color designates depth