

## DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99  
 DEQ adapted to Word 8/07  
 Revised 8/19/13

**RCRA Corrective Action Environmental Indicator (EI) RCRAInfo Code (CA750)**  
**Migration of Contaminated Groundwater Under Control**



**Facility Name:** Chemours – Montague (f.k.a.: DuPont Montague Works)  
**Facility Address:** 6270 Wilkes Road, Montague, Michigan  
**Facility Site ID #:** MID 000 809 640

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Waste Management Units (WMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?
- If yes - check here and continue with #2 below.
- If no - reevaluate existing data, or
- If data are not available, skip to #8 and enter "IN" (more information needed) status code.

**BACKGROUND****Definition of Environmental Indicators (for the RCRA Corrective Action)**

EIs are measures being used by the RCRA Corrective Action Program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EIs developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for nonhuman (ecological) receptors is intended to be developed in the future.

**Definition of "Migration of Contaminated Groundwater Under Control" EI**

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA Corrective Action at or from the identified facility [i.e., site-wide]).

**Relationship of EI to Final Remedies**

While final remedies remain the long-term objective of the RCRA Corrective Action Program, the EIs are near-term objectives that are currently being used as program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated groundwater and contaminants within groundwater (e.g., nonaqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

**Duration/Applicability of EI Determinations**

EI determination status codes should remain in the RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

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2. Is **groundwater** known or reasonably suspected to be "**contaminated**"<sup>1</sup> above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?
- If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
- If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."
- If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

**Site Background**

This EI evaluation has been prepared for the DuPont Montague facility (the site), which is a former chemical manufacturing facility located in Muskegon County, Michigan. This site is subject to corrective action under Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and its administrative rules. To date, E.I. du Pont de Nemours and Company (DuPont) has been conducting corrective action at the facility on a voluntary basis. With the Michigan Department of Environmental Quality (MDEQ), Office of Waste Management and Radiological Protection, providing oversight as necessary, DuPont has been using the environmental protection standards and relevant processes approved under Part 111 to meet their corrective action obligations.

The site is approximately two miles southwest of the city of Montague. The plant property consists of approximately 1,330 acres and is bounded by forested, agricultural, residential, and former industrial properties. The property to the east is owned by Occidental Chemical Company (Oxychem). The former operating part of the facility is located about one mile north of White Lake and 1.5 miles east of Lake Michigan.

DuPont purchased the Montague property in the 1940s. In 1955, DuPont built the Montague facility, and it became fully operational in 1956. Initially, the DuPont Montague facility produced acetylene and neoprene. Later, various formulations of Freon® (chlorofluorocarbons or CFCs) were manufactured at the site, and the acetylene and neoprene facilities were demolished.

In 1996, the DuPont Montague facility ceased all operations; in 1998, the manufacturing facility was demolished. The only structures that remain support the site's groundwater pump-and-treat system. The pump-and-treat system first began operations in the 1960s. Enhancements to the pump-and-treat system were completed in August 2008.

**Known and Potential Source Areas**

Historical investigations conducted at the site identified a release of volatile organic compounds (VOCs) to site groundwater. Two sources of VOCs have been identified within the Former Manufacturing Area: the former National Pollutant Discharge and Elimination System (NPDES) surface impoundments and the former Railcar Unloading Area West. The three primary VOCs in the groundwater plume are carbon tetrachloride, tetrachloroethylene (PCE), and 1,1,2-trichlorotrifluoroethane (CFC-113). As noted above, a pump-and-treat system is in place at the site, which currently captures groundwater downgradient of the Former Manufacturing Area.

Outside of the Former Manufacturing Area, potential sources of VOCs to site groundwater include the Northeast Landfill and the Pierson Creek Landfill. The Northeast Landfill is within the capture zone of the

pump-and-treat system. Because of its distance from the interceptor wells, groundwater flow in the vicinity of the Pierson Creek Landfill is outside the extent of the capture zone. Current groundwater monitoring data collected at the landfill indicates that the extent of the release to groundwater is limited to directly adjacent to the landfill in the upper aquifer (URS, 2012b).

#### **Data Set for EI Evaluation**

Groundwater quality at the facility is monitored under the supervision of MDEQ. Historically, routine groundwater monitoring (quarterly or semi-annual) has been conducted at the site since 1990 in relation to site landfills. Historical groundwater data has also been collected in relation to the site's groundwater pump-and-treat system.

Compliance monitoring wells associated with the enhanced pump-and-treat system were installed in the fourth quarter of 2009 and have been monitored on a quarterly basis since that time. Compliance monitoring includes the sampling of 13 locations. Groundwater from the locations is analyzed for 14 site-specific VOCs using USEPA SW846 Method 8260B.

In addition to the quarterly monitoring, a site-wide semi-annual sampling event is currently conducted and reported to MDEQ in the spring and fall of each year. Forty-one monitoring wells are included in the semi-annual sampling program. Groundwater from the locations is analyzed for 14 site-specific VOCs using USEPA SW846 Method 8260B (URS, 2012a).

Groundwater sampling has also been conducted at the site as part of voluntary remedial investigations (RIs). During the 2010/2011 RI, groundwater was sampled from 15 monitoring well locations and analyzed for site-specific VOCs, SVOCs, furans or metals, depending on the location. Results from the RI are detailed in the *DRAFT 2010/2011 Remedial Investigation Report* (RI Report - URS, 2012b), which was submitted to the MDEQ in June 2012.

Consistent with the start of compliance monitoring at the site in 2009, data collected between December 2009 and May 2012 was utilized for this EI evaluation. The data set includes groundwater data collected during compliance monitoring, semi-annual monitoring and remedial investigations.

#### **Screening Levels Used to Evaluate Site Data**

Groundwater is not used for drinking water on-site and occurs at depths [greater than 15 feet below ground surface (bgs)] where direct contact during intrusive activities is unlikely to occur. Groundwater is also not used for drinking water downgradient of the site (between William Road on the west and Lake Shore Drive to the east) due to pump-and-treat activities currently in operation capturing Former Manufacturing Area groundwater and the municipal water connections recently installed to area residents (by DuPont and Oxychem). However, as a conservative measure, constituents detected in on-site groundwater were compared to Generic Cleanup Criteria for Non-Residential Drinking Water Criteria (MDEQ No. 2) as defined in R 299.5746 and R 299.5748 of the administrative rules promulgated pursuant to Part 201, Environmental Remediation, of Act 451.

#### **Constituents of Potential Concern (COPCs) in Groundwater**

The constituents detected in site-wide groundwater were compared to the screening criteria (MDEQ No. 2). The following six VOCs were detected above screening criteria: benzene, carbon tetrachloride, cis-1,2-dichloroethene, PCE, toluene and trichloroethene (TCE).

Of these, PCE was most frequently detected above screening criteria. The maximum detected concentration of PCE was observed in monitoring well MWWLP-01-125, which is immediately next to interceptor well IW-7 associated with the site groundwater pump-and-treat system. Benzene and toluene exceedances were limited to one monitoring well location (MW-224-60), which is located downgradient of the Northeast Landfill. Exceedances were observed during one monitoring event (May 2010).

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Concentrations were less than screening criteria prior to and since the monitoring event. Groundwater downgradient of this unit is captured by the existing pump-and-treat system.

**References Cited in this EI:**

DuPont CRG. 2006. *Prioritization of Waste Management Units and Areas of Concern at the DuPont Montague Site, Montague Michigan*. November 2006.

URS, 2012a. *Second Half Semi-Annual 2011 Groundwater Monitoring Results*. DuPont Montague Works. March 5, 2012.

URS, 2012b. *DRAFT 2010/2011 Remedial Investigation Report*. DuPont Montague Site. June 2012.

URS, 2012c. *Response to Information Request Regarding Mixing Zone Reauthorization; MID 000 809 640 DuPont Montague Works*. April 19, 2012.

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater" as defined by the monitoring locations designated at the time of this determination)?

- If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"<sup>2</sup>.
- If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"<sup>2</sup>) – skip to #8 and enter "NO" status code, after providing an explanation.
- If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Interceptor pumping wells have been in use at the site to address groundwater constituents associated with the lime pile (since 1963) and the former Railcar Unloading Area West (since 1982). In October 2006, DuPont submitted a formal request to MDEQ to implement the enhanced groundwater pump-and-treat system; this request was approved in June 2007. Construction activities associated with the enhanced groundwater pump-and-treat system were completed in August 2008, and the newly installed pump-and-treat system started operation on August 21, 2008.

The purpose of the pump-and-treat system is to achieve downgradient capture of site-related VOCs exceeding Michigan Final Acute Values (FAVs). The FAVs are considered protective of aquatic life in White Lake. The current groundwater extraction system consists of four groundwater interceptor wells (IW-01, IW-05, IW-06, and IW-07). Groundwater is extracted at a rate of approximately 680 gallons per minute and is treated by an air stripper system. Granular activated carbon units are used to capture VOCs from the air stripper system, and the carbon units are periodically steam regenerated to recover VOCs (URS, 2012b).

In support of the enhanced pump-and-treat system, cone penetrometer test (CPT) groundwater sampling was conducted at DuPont Montague's White Lake Property in September 2009. This work defined the edges of extent for CFC-113, PCE, and carbon tetrachloride adjacent to White Lake. Based on the CPT study, locations for the pump-and-treat system compliance wells were selected. Compliance monitoring wells were installed in November 2009 and quarterly monitoring of the locations has been conducted since December 2009.

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Concentration trends in site monitoring well locations have been detailed in the Semi-Annual Groundwater Monitoring Reports prepared for the site. Historical VOC data for 33 monitoring well locations are provided in the reports. Data tabulated for each location includes not only semi-annual data collected during more recent events, but also historical data (collected since 1990), depending on the location. As supported by tables, maps and trend charts presented in the reports, constituent concentrations overall have remained stable or are decreasing (URS, 2012a).

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

- If yes - continue after identifying potentially affected surface water bodies.
- If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
- If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Groundwater from the Former Manufacturing Area flows predominantly south/southeast toward White Lake. The groundwater velocity is approximately 2 feet per day (feet/day). The vertical groundwater gradient in the eastern two-thirds of the site is slightly downward from the site towards White Lake. Near White Lake, which acts as a discharge point, the vertical gradient is upward (DuPont CRG, 2006).

Groundwater containing site-related constituents that exceed FAV criteria are being captured by the four site groundwater interceptor wells. The capture zone is a result of the hydraulic influence from the interceptor wells. Measured groundwater elevations, supplemented by groundwater flow modeling, are used to determine the capture zone of the system. The boundary of the estimated FAV plume is within the modeled capture zone (URS, 2012b).

That portion of the plume not within the system's capture zone (just beyond the edges of the dotted purple line) vents to White Lake in two areas. These two areas are monitored by the Lake Shore Drive (LSD) monitoring wells and the White Lake Property (WLP) monitoring wells. Property along the LSD well segments (eastern side of the capture zone) is privately owned, residential property. The WLP well segments are on property owned by DuPont (western side of the capture zone) (URS, 2012c).

West of the Former Manufacturing Area, adjacent to Pierson Creek, groundwater flow is to the west-southwest due to the influence of the Pierson Creek valley. Because of its distance from the interceptor wells, groundwater flow in the vicinity of the Pierson Creek Landfill follows its natural pattern, discharging to Pierson Creek. There are numerous shallow, spring-fed tributaries that discharge along the foot of the hillside at Pierson Creek, and an upward vertical hydraulic gradient exists in paired monitoring well clusters near the creek (URS, 2012b).

Pierson Creek is a small creek fed by numerous tributaries. At the northern site boundary, the creek drains a rural, agricultural area extending approximately 5 miles north of the site. South of the site, the creek flows southwest and empties into Sadony Bayou approximately 0.5 mile downstream. The Creek ultimately drains into White Lake approximately 1 mile south of the site near the White Lake outlet to Lake Michigan.

Consistent with all surface waters of the state, White Lake is designated for the following uses by the State of Michigan: agricultural; navigation; industrial water supply; recreational (e.g., swimming and boating); fish consumption; aquatic life propagation and maintenance; wildlife; and as a coldwater fishery.

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5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions [e.g., the nature, and number, of discharging contaminants, or environmental setting], that significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?
- If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: (1) the maximum known or reasonably suspected concentration<sup>3</sup> of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and (2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
- If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: (1) the maximum known or reasonably suspected concentration<sup>3</sup> of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and (2) for any contaminants discharging into surface water in concentrations<sup>3</sup> greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.
- If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

For the purpose of this evaluation, the significance of groundwater discharge has been evaluated by the potential receiving water body: White Lake or Pierson Creek.

**White Lake**

In addition to the proposed modifications of the system, DuPont requested that MDEQ grant a Mixing Zone Determination for groundwater containing site-related VOCs flowing towards White Lake not captured by the pump-and-treat system. MDEQ provided DuPont acceptable concentration limits for discharges to White Lake for the constituents identified in the request. In MDEQ's August 2007 approval letter, MDEQ provided "recommended mixing-zone-based GSI values." The mixing-zone-based groundwater-to-surface water interface (GSI) criteria consisted of two values: acute and chronic.

Acute GSI criteria are calculated as maximum concentrations that are not to be exceeded at any of the GSI monitoring points to prevent potential impact to aquatic life. Dilution is not considered with acute criteria. Chronic mixing-zone-based GSI criteria are calculated based on dilution of the maximum discharge flow of venting groundwater and the allocated low flow value of the receiving surface water. When GSI values are developed, they are protective of aquatic life, human health, or wildlife.

MDEQ provided clarification to the assessment of the White Lake Mixing Zone (WLMZ) in a comment letter dated February 1, 2011 (Mixing Zone Implementation). In the February 1, 2011 letter, MDEQ outlined a three step process. In the first step, results from each of the compliance monitoring wells are compared to the acute mixing zone-based criteria. No single well can exceed the acute value. In the second step, results from each of the compliance monitoring wells are compared to the chronic mixing zone-based criteria. If the concentrations in all of the compliance monitoring wells are below the chronic

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criteria concentrations, then the mixing zone would be in compliance. If one or more of the compliance wells exceeded the chronic criteria concentrations, then the concentrations could be evaluated statistically or using chronic mass loading limits.

Groundwater samples collected from five well pairs in the mixing zone represent the quality of groundwater that is reaching the WLMZ: MWWLP-02, MWWLP-03, MWLSD-01, MWLSD-02, and MWLSD-03. Groundwater sample data was compared to the mixing zone-based GSI values. Generic GSI values (March 2011 version) were also considered as a point of comparison for other VOCs monitored in site groundwater. As noted in MDEQ's August 2007 approval letter, other analytes included in the mixing-zone request were not deemed a concern by MDEQ for the GSI pathway.

Acute GSI criteria are not exceeded in any well. Chronic mixing-zone based GSI criteria were exceeded in one compliance well location (MWWLP-03-80) for one COPC (carbon tetrachloride). Carbon tetrachloride has not been detected in any other compliance monitoring well pairs. During the most recent monitoring event in May 2012, carbon tetrachloride was detected at a concentration of 170 micrograms per liter (ug/L). The chronic mixing-zone based GSI criterion is 45 ug/L.

Consistent with the three-step process, mass flux for carbon tetrachloride to the WLMZ was then calculated for comparison to chronic mass loading limits for the WLMZ. These mass loading limits were developed by MDEQ specifically for the WLMZ, and were provided to DuPont in the February 1, 2011, comment letter. Mass flux calculations were made. The site remains in compliance with the chronic mass loading criteria for carbon tetrachloride. The mass flux calculated for carbon tetrachloride (0.020 pounds per day [lb/day]) did not exceed the chronic mass loading criteria (0.020 lbs/day). As a result, groundwater discharge to surface water is not considered significant.

In the event that either the acute GSI criteria or the chronic mass loading limits are exceeded, the *Mixing Zone Compliance Monitoring and Contingency Plan*, dated September 11, 2007 outlines generic activities to be implemented should the compliance groundwater monitoring program indicate that the required capture is no longer being attained by the enhanced pump-and-treat system. Section 3.1 of the contingency plan describes adjusting the pump and treat systems extraction rates within the system operating limits (described in section 3.3 of the contingency plan). Any adjustments considered for the extraction system rates would be first modeled using the site's groundwater flow model to determine the predicted aquifer response. When a resolution has been determined, those changes would be implemented and MDEQ would be notified in writing of the adjustments and its predicted impact on groundwater flow. This contingency plan provides the basis for addressing the potential for future groundwater discharges that might be otherwise be considered significant. If the mixing zone monitoring confirms a potentially significant groundwater discharge, the contingency plan will be followed to adjust the system or develop an alternative action.

### **Pierson Creek**

To evaluate groundwater migration pathways to Pierson Creek, constituents detected in groundwater from the following monitoring wells associated with Pierson Creek Landfill were compared to generic GSI criteria (MDEQ No. 3): MW-208-20, MW-208-83, MW-209-67, MW-250-54, PCL-03-17, PCL-04-17, PCL-05-45, PCL-05-78, and PCL-06-77.

PCE and CFC 113 were detected in MW-250-54 above GSI criteria. Monitoring well MW-250-54 is located downgradient of the landfill directly adjacent to its northwestern boundary. None of the VOCs were detected in locations downgradient of the landfill (PCL-06-77) and adjacent to Pierson Creek (PCL-03-17 and PCL-04-17). In addition, no exceedances were observed in monitoring wells screened in the deeper aquifer (such as MW208-83) or in monitoring wells installed west of Pierson Creek (such as PCL-05-45 and PCL-05-78). This lack of constituents in the deeper aquifer is consistent with the upward hydraulic gradient in the vicinity of Pierson Creek (URS, 2012b).

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Potentially complete groundwater discharge from the landfill to Pierson Creek is evaluated further in Item 6 below.

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented<sup>4</sup>)?
- If yes - continue after either: (1) identifying the final remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR (2) providing or referencing an interim-assessment, appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and ecosystems, until such time when a full assessment and final remedy decision can be made. Factors that should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.
- If no - (the discharge of "contaminated" groundwater cannot be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.
- If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):

On July 27, 2015, OWMRP submitted a preliminary mixing zone request to Water Resources Division for mixing zone numbers at Pierson Creek. OWMRP provided the highest known concentrations observed for water that could still be within the flow system, assuming discharge to Pierson Creek. WRD indicated that it was not likely to exceed water quality standards at Pierson Creek based upon the information provided. Within the request, the OWMRP also requested WRD generate the mixing zone criteria assuming higher concentrations have yet to be encountered. Chemours is scheduling additional investigation to verify that all impacted waters are discharging to Pierson Creek, and if that is borne out, then a more accurate profile of the plume configuration discharging to Pierson Creek will be conducted in a near future investigation. Based upon all current data, the groundwater is discharging to Pierson Creek within acceptable limits.

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7. Will groundwater **monitoring**/measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"
- If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of



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groundwater contamination."

- If no - enter "NO" status code in #8.
- If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

Quarterly compliance and semiannual groundwater monitoring will continue under the current schedule. This will provide verification that contaminated groundwater has remained within the dimensions of the "existing area of contaminated groundwater."

Additional investigation of potential groundwater discharge at the Pierson Creek area is also planned.

8. Check the appropriate RCRAInfo status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), obtain supervisor signature and date on the EI determination below, and attach appropriate supporting documentation, as well as a map of the facility.
- YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Chemours - Montague facility, EPA ID # MID 000 809 640, located at 6270 Wilkes Road, Montague, Michigan. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." This determination will be reevaluated when the agency/state becomes aware of significant changes at the facility.
- NO - Unacceptable migration of contaminated groundwater is observed or expected.
- IN - More information is needed to make a determination.

Completed by:  Date: September 9, 2015

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Locations where references may be found:

Hazardous Waste Section facility files at:  
Office of Waste Management and Radiological Protection  
Michigan Department of Environmental Quality  
525 West Allegan Street  
Lansing, Michigan 48933

White Lake Community Library  
3900 White Lake Drive  
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Facility Name: Chemours - Montague  
EPA ID #: MID 000 809 640  
City/State: Montague, Michigan

MIGRATION OF CONTAMINATED GROUNDWATER  
UNDER CONTROL (CA 750)

