



The Chemours Company
Pompton Lakes Works
2000 Cannonball Road
Pompton Lakes, NJ 07442

September 30, 2016

SENT VIA EMAIL PDF

Mr. Brian Salvo
New Jersey Department of Environmental Protection
Bureau of Surface Water Permitting
401 East State Street
P.O. Box 420
Trenton, New Jersey 08625-0420

**RE: Request for Approval of Chemical Addition for
Category BGR – General Remediation Clean-up Permit Authorization
NJPDES Permit No. NJG0251534
The Chemours Company FC, LLC
Pompton Lake Study Area Corrective Measures
Pompton Lakes Borough, Passaic County**

Dear Mr. Salvo:

The Chemours Company FC, LLC (Chemours) is submitting this request for approval of the use of chemical addition agents as part of the Pompton Lakes Study Area (PLSA) water treatment system under the New Jersey Pollutant Discharge Elimination System (NJPDES) Discharge to Surface Water permit, Category BGR – General Remediation Clean-up Permit Authorization (NJPDES Permit No. NJG0251534).

This request for approval of chemical addition is to improve treatment system performance. Due to variance in the influent water, chemical additions to the water treatment plant at the PLSA project are necessary to remove soluble mercury, copper and Total Organic Carbon (TOC) prior the discharge. The treatment plant designer and operator, Severson Environmental Services, Inc. (Severson), has conducted additional treatability studies to address these constituents and concluded that chemical addition to the existing treatment plant will be necessary prior to filtration.

Proposed Chemical Addition

Based upon the results of the treatability studies the below Table 1 summarizes the proposed chemicals to be used in the treatment process, and the estimated mass of each chemical. The Safety Data Sheets for each proposed chemical are attached to this letter.

Table 1: Summary of Proposed Chemical Addition at Chemours Pompton Lakes Uplands Water Treatment Plant


Chemical	Purpose	Form	Projected Dosage, mg/L	Estimated Usage, Lbs/Day¹
Ferric Sulfate (KEMIRA PIX-312)	Precipitation of heavy metals Precipitation of dissolved organic carbon	50% solution by weight	100-200 mg/L	6.7
Sodium Sulfide	Precipitation of trace heavy metals	10% solution by weight	1-2 mg/L	0.07
Powdered Activated Carbon (PAC)	Removal of dissolved organic carbon	Dry	100 mg/L	3.3
Polymer	Flocculation of solids to facilitate removal by settling and filtration	30% neat solution by weight	5-10 mg/L	0.2

Food-grade chemicals will be used to minimize the presence of toxic metals or organics in the chemicals. Dry powdered activated carbon (PAC) may also be added to ensure that the necessary TOC removals are achieved. Note that the PAC will be removed from the bottom of the Equalization Tank and through the downstream bag filters, prior to discharge to Pompton Lake.

The proposed polymer (Dixie 757) is the same polymer that was discussed in the initial Request for Authorization (RFA) for this project as part of the filter press dewatering in the hydraulic dredging phase of the project.

We would appreciate an expeditious review of this request as the remediation project is ongoing and water is currently being stored onsite to ensure that the appropriate effluent limitation are met prior to discharge. The volume of water that can be stored onsite is limited and thus approval of this package by Friday October 7, 2016 would be greatly appreciated. Please contact me at (973) 492-7703 or Alicia Lyding at (973) 492-7702 if you should have any questions regarding this package.

Sincerely,



David E. Epps, P.G.
Project Director, Pompton Lakes Works
Corporate Remediation Group

¹ Mass used at an estimated daily flow of 4,000 gals/day at maximum estimated dosage

Cc: PLW Central file
Alicia Lyding, HDR
Anthony Cinque, NJDEP
Perry Katz, USEPA