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December 1, 2010

Mr. Frank Faranca
New Jersey Department of Environmental Protection
Division of Responsible Party Site Remediation
401 East State Street
P.O. Box 028
Trenton, New Jersey 08625-0028

Mr. Clifford Ng
U.S. Environmental Protection Agency
Region 2
290 Broadway
Floor 22
New York, New York 10007-1866

**RE: Vapor Interim Remedial Measure Work Plan Addendum
DuPont Pompton Lakes Works PI#007411
Pompton Lakes, New Jersey**

Dear Mr. Faranca and Mr. Ng:

It is our understanding that specific members of the Pompton Lakes community are requesting that the list of compounds being analyzed for in sub-slab samples be expanded to match the analytical list for indoor air samples being collected under the *Vapor Interim Remedial Measure Work Plan (VIRMWP)* approved by the New Jersey Department of Environmental Protection (NJDEP) and U.S. Environmental Protection Agency (USEPA) in 2008. Currently, sub-slab samples are analyzed for those compounds which have been identified in the offsite groundwater plume that are related to the former manufacturing operations at the DuPont Pompton Lakes Works facility. The purpose of this letter is to propose an addendum which would formally document the change in procedures to the approved VIRMWP.

Groundwater investigation and monitoring began at the site in the early 1980's. A Comprehensive Groundwater Monitoring Program (CGMP) was developed and in 1995 and subsequently approved by NJDEP. This program was developed based on an extensive review of data collected from 126 monitoring wells located onsite and offsite over a long time period. The analysis performed as part of the CGMP determined that the primary constituents of concern (COCs) in groundwater, both onsite and offsite, consist of the following chlorinated volatile organic compounds (VOCs):

- Tetrachloroethene (PCE)
- Trichloroethene (TCE)
- cis-1,2-Dichloroethene (cis-1,2-DCE)
- trans-1,2-Dichloroethene (trans-1,2-DCE)

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- 1,1-Dichloroethene (1,1-DCE)
- 1,1,1-Trichloroethane (1,1,1-TCA)
- 1,1-Dichloroethane (1,1-DCA)
- 1,2-Dichloroethane (1,2-DCA)
- Vinyl chloride (VC)
- Carbon tetrachloride

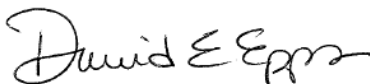
In May 2009, samples were collected from representative monitoring wells located onsite and offsite to evaluate VOC concentrations in groundwater and confirm that the current COC list was still representative for monitoring concentrations in the plume area over time. The full list of volatile organic constituents was analyzed as part of this event. NJDEP performed oversight of sampling activities and collected split samples at select locations.

An evaluation of the results between the samples collected by DuPont and NJDEP indicated that concentrations were generally consistent with each other and were consistent with previous groundwater data submitted and approved by NJDEP for the site. Based on this data it can be concluded that the list of 10 COC's is also representative for assessing sub-slab concentrations beneath structures in the offsite groundwater plume area and evaluating the potential for vapor intrusion at these structures.

In response to requests from select community members, DuPont is proposing to amend the current work plan such that sub-slab samples collected moving forward will be analyzed for the same VOC list as described in the work plan for indoor air samples (i.e., full list of VOCs totaling 61 compounds), if requested by the property owner. However, in accordance with the approved VIRMWP, DuPont is responsible for the investigation and remediation of only those compounds associated with its former manufacturing facility as listed above and verified by the groundwater sampling programs conducted at the site.

If the addendum is acceptable, DuPont requires that NJDEP and USEPA provide written approval of the scope change and confirmation of DuPont's investigation and remediation obligations for only those compounds associated with the former manufacturing operations at the Pompton Lakes Works facility as listed in the approved VIRMWP.

Sincerely,



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

cc: PLW Central File