

From: [Holman, Sheila](#)
To: [Peterson, Kyle R](#)
Subject: FW: Chemours - Sampling Plan - dated 12-28-2018 CO 11(b)
Date: Tuesday, March 19, 2019 5:44:50 PM

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From: Grzyb, Julie
Sent: Tuesday, March 19, 2019 5:38 PM
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Subject: Chemours - Sampling Plan - dated 12-28-2018 CO 11(b)

To: Christel Compton, Program Manager, The Chemours Company- Fayetteville Works
From : Julie Grzyb, Supervisor, NPDES Complex Permitting
Subject: Chemours' Sampling Plan submitted per Consent Order Requirement 11(b)
Date: 3/19/2019

The Division of Water Resources, NPDES Complex Permitting has reviewed the sampling plan submitted by Chemours on Dec. 31, 2018 as part of the CO and we have the following comments:

- 1) **The influent to the Wastewater Treatment Plant should be included as one of the sampling locations.**
- 2) **The effluent from whichever sedimentation basin is discharging (only one basin is in use at a time) should be included as one of the sampling locations.**
- 3) **Page 6 : Process Wastewater**

Process wastewater samples will be collected as grab samples from the Chemours Monomers IXM Area, Chemours PPA Area, Kuraray and DuPont (Locations 16 to 19). The project team is working with Chemours, Kuraray and DuPont facility staff to identify and access the appropriate sampling points **for the combined process wastewater** from each of these areas.

Discrete process wastewater samples should be collected from Kuraray and DuPont.

- 4) All PFAS reported as a result of the 537.1 test method shall be reported in the results including PFOS and PFOA (i.e. Table 1 seems incomplete only one compound is listed for Method 537).
- 5) Page 8: Equipment, Trip and Field Blanks.

Equipment blanks will be collected at a frequency of one per day during the Initial Characterization, then their frequency and the need for other blanks will be re-evaluated for Ongoing Sampling.

Because contamination can be random as well as systemic, analysis of all three types of blanks, not just if there is a value above the PQL for Equipment Blank should be required.

- 6) On the first page,
 - a. it should say “requirements specified in Paragraph 11(b)” (rather than “Paragraph 11” since there are additional requirements and plans due under Paragraph 11);
 - b. off-site disposal is for all Chemours process wastewater (not just process wastewater containing GenX);
 - c. Chemours uses “emissions” to refer to both air and water; should it be “discharges” for water?

NPDES recommends that Chemours proceed with the Sampling Plan provided sampling points identified in comments number 1, 2, and 3 are added and all PFAS compounds analyzed using the modified 537.1 test method are reported including PFOS and PFOA. Item number 5 should be addressed as standard QA QC procedures.

The Division has a site visit planned on March 29th and reserves final approval of the sampling plan until comments that may result from that visit can be stated and addressed. Items listed in number 6 can be addressed with any additional comments and revisions resulting from the site visit.

Please let me know if you would like to discuss any of these items in more detail.

Julie A Grzyb

Supervisor

NPDES Complex Permitting

NC DEQ / Division of Water Resources / Water Quality Permitting

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