

**From:** [Holman, Sheila](#)  
**To:** [Peterson, Kyle R](#)  
**Subject:** Fw: [External] RE: Chemours - Sampling Plan - dated 12-28-2018 CO 11(b)  
**Date:** Friday, March 29, 2019 12:29:00 PM  
**Attachments:** [image001.png](#)

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**From:** Geoff Gisler <[ggisler@selcnc.org](mailto:ggisler@selcnc.org)>  
**Sent:** Friday, March 29, 2019 12:23 PM  
**To:** 'Compton, Christel E'; Grzyb, Julie  
**Cc:** Lane, Bill F; Benzoni, Francisco; Abraczinskas, Michael; Scott, Michael; Culpepper, Linda; Long, Brian D; Shelton, Dave; [jfsavarese@wlrk.com](mailto:jfsavarese@wlrk.com); [kemp@cfrw.us](mailto:kemp@cfrw.us); [kemp@cfrw.org](mailto:kemp@cfrw.org); Joel M.; Holman, Sheila; Kelly Moser; Jean Zhuang  
**Subject:** [External] RE: Chemours - Sampling Plan - dated 12-28-2018 CO 11(b)

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Christel,  
I submit the following comments and questions on behalf of Cape Fear River Watch.

Figures 1 and 2 only show the “known drains and ditches.” Chemours should analyze the site for other areas that receive process and non-process wastewater flow and stormwater flow during rain events. Only then can Chemours adequately characterize all process and non-process wastewater and stormwater streams from each of the facility’s manufacturing areas. On page 5 of the plan, it states that “Locations 4, 7, 10, 12, 13, and 15 are a combination of stormwater and treated process and non-process water.” However, we were informed during the site visit that not all of the locations contain all three types of water (combination, process, and non-process water). Looking at the sampling locations, it appears that locations 4, 7, 10, and possibly 13 and 15, should not contain process wastewater. Please clarify exactly what

types of water are at each location.

At the very least, Chemours should sample at the intake and discharge for each of the manufacturing areas at the facility. It is not entirely clear that is being done within this sampling plan.

The sampling plan should also include a sampling location at Chemours' intake location for the Cape Fear River. Sample location 1 is not representative of actual background concentrations in the Cape Fear River.

The sampling plan should include more sampling locations along the cooling water channel, particularly the areas that historically carried process wastewater in order for the sampling to be representative of potential contamination throughout that channel.

Slide 31 of Chemours' January 31, 2019 Conceptual Site Model Updates and Old Outfall 002 Presentation demonstrated that there are extremely high levels of contamination in the southeast corner of the DuPont manufacturing area. The sampling plan should include more sampling points in that area of the facility to determine the source of that contamination.

The sampling plan does not include a sampling point in the open channel to Outfall 002 anywhere from location 7 to location 20. There should be more sampling points along this channel (i.e., after it receives discharges from the WWTP, from the cooling water channel, and from DuPont's ditches).

Flow should be analyzed as well to determine mass loading of PFAS from each stream.

How does DuPont's process wastewater reach the wastewater treatment plant?

How does Kuraray's process wastewater reach the wastewater treatment plant? Through the wood-lined channel?

Why is there non-process wastewater at location 4? Is there non-process wastewater in areas of the site outside of the cooling water channel as depicted in Figure 2?

Thank you,

Geoff

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**From:** Compton, Christel E [mailto:CHRISTEL.E.COMPTON@chemours.com]  
**Sent:** Tuesday, March 19, 2019 5:41 PM  
**To:** Grzyb, Julie  
**Cc:** Lane, Bill F; Benzoni, Francisco; Abraczinskas, Michael; Scott, Michael; Culpepper, Linda; Long, Brian D; Shelton, Dave; jfsavarese@wlrk.com; kemp@cfwr.us; Geoff Gisler; kemp@cfwr.org; Joel M.; Holman, Sheila  
**Subject:** RE: Chemours - Sampling Plan - dated 12-28-2018 CO 11(b)

Thank you, Julie –

I am in receipt of your comments and will ensure they are addressed in the plan.

Thank you –  
Christel

Christel Compton  
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**From:** Grzyb, Julie [mailto:julie.grzyb@ncdenr.gov]  
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**Cc:** Lane, Bill F <Bill.Lane@ncdenr.gov>; Benzoni, Francisco <fbenzoni@ncdoj.gov>; Abraczinskas, Michael <michael.abraczinskas@ncdenr.gov>; Scott, Michael <michael.scott@ncdenr.gov>; Culpepper, Linda <linda.culpepper@ncdenr.gov>; Long, Brian D <Brian.D.Long@chemours.com>; Shelton, Dave <DAVID.C.SHELTON@chemours.com>; jfsavarese@wlrk.com; kemp@cfwr.us; ggisler@selcnc.org; kemp@cfwr.org; Joel M. <Joel.Gross@arnoldporter.com>; Holman, Sheila <sheila.holman@ncdenr.gov>  
**Subject:** Chemours - Sampling Plan - dated 12-28-2018 CO 11(b)

External email. Confirm links and attachments before opening.

**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 29<sup>th</sup> 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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