

From: [Culpepper, Linda](#)
To: [Peterson, Kyle R](#)
Subject: FW: Post-Site Visit Sampling Plan Comments
Date: Monday, April 15, 2019 5:17:32 PM

Forwarding final direction given for Paragraph 11(b) on April 9th.

Linda

Linda Culpepper
Director, NC DEQ Division of Water Resources

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From: Grzyb, Julie
Sent: Tuesday, April 9, 2019 6:39 PM
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Subject: Post-Site Visit Sampling Plan Comments

Christel:

We would like to thank you and the rest of the team for taking the time to show us around the facility and providing explanations throughout the tour. We also appreciate the work put into Eddie's map that shows the locations of all pipes within the Chemours manufacturing area and look forward to similar maps for the rest of the site. As discussed, in order for us to provide final comments on the proposed Sampling Plan, we will need a revised Sampling Plan Map because of the inaccuracies and lack of clarity on sampling points discovered on the original map. We request that the following actions/information be addressed on the revised map and Table 3 descriptions of sampling points.

1. The map should clearly and accurately depict all sampling locations. Additionally, clearer descriptions of the sampling points should be provided (specifically, sampling points #14, #9, and #4.)
2. Sampling point #9 was unclear; however, we request that there be a sampling point prior to the Chemours discharge located at pipe A26 (as marked on Eddie's map), one of the discharge from A26, and one after the discharge from A26 but prior to the open channel going underground.
3. In addition and if possible, we would like a separate sample from the Kuraray Sentry Glass process wastewater and lab waste areas (separate from the stormwater). This additional sampling location should be marked on the map.
4. Please add a sampling point halfway between Outfall 001 prior to comingling with discharge

at points #13 and 15.

5. Please show on the map where the DuPont process wastewater samples will be taken from both DuPont facilities (i.e. at the collection sump for the WWTP). Samples should be collected from both DuPont facilities and marked as two separate samples in the Plan.

Furthermore, clarification is needed from Chemours on the following items so we can comment appropriately on the Plan:

1. Does Chemours have a device to measure the volume of flow that is discharged from the sedimentation basins be measured?
2. Does the stormwater from sampling point #3 cross under the road to the wood-lined ditch in a pipe? We were unable to locate this pipe during our visit.
3. Please clarify what is being sampled at point #4. Is this stormwater from Kuraray's Sentry Glass manufacturing area?
(We may have clarified this in our discussion, but just in case we still want to ask Chemours to clarify this in the Plan because the naming of the Kuraray manufacturing areas is slightly confusing.)
4. Clearly define sampling point #14. Will two separate NCCW samples be taken from each of the DuPont facilities or will this be one sample? Where exactly is this sample being taken?
5. For clarification, does sampling point #15 include stormwater and non-contact cooling water from Chemours' Vinyl ethers north, Vinyl ethers south, and the IXM manufacturing areas? Will this sample contain any water from DuPont?
6. Also, please specify what type of DI water treatment system is used by DuPont (i.e. reverse osmosis, ion exchange).

Please let me know if you have any questions on these comments.

Julie

Julie A Grzyb

Supervisor

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