



ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

May 30, 2018

Ms. Christel Compton
Program Manager
The Chemours Company FC, LLC
22828 NC Highway 87 W
Fayetteville, NC 28306

RE: Onsite Characterization of Groundwater

Dear Ms. Compton:

The N.C. Division of Waste Management (DWM) has received a response letter from Chemours dated April 9, 2018, which states:

“Beyond the question of PFAS inputs to the cooling water channel, the Additional Site Investigation Report (which was updated and resubmitted to the DWM on March 29, 2018), contains figures showing groundwater sampling results for PFAS in the perched water zone at the highest concentrations in onsite groundwater in the immediate vicinity of the cooling water channel. This data suggested to us at the time of receipt that the cooling water channel could be a source of PFAS to the perched zone, as stated in the Focused Feasibility Study. In the subsequent weeks following the submission of the Feasibility Study, Chemours’ ongoing analysis of data suggests that a terracotta sewer pipe that formerly carried process wastewater from the Fluoropolymers/Nafion™ area to the site wastewater treatment plant, where it mixed with process water from Kuraray SentryGlas®, Butacite®, and the power plant before ultimately discharging to the WWTP, may be an additional source of PFAS to the perched zone, thus suggesting that the cooling water ditch may not be as significant of a source as originally hypothesized. The terracotta sewer pipe from the Fluoropolymers/Nafion™ area was cut and capped in November 2017 and is therefore no longer a source of target PFAS to the Perched Zone. Chemours is conducting further sampling, including soil samples along the pipe route, to better understand the contribution of the terracotta pipe to PFAS levels in the perched zone. Chemours will provide the data to NC DEQ as it becomes available.”

Based on this letter and additional information shared during the March 23rd site visit, DWM is requesting additional information about the terra cotta pipe in order to better understand contamination and contamination sources at the Fayetteville Works site.

Please provide DWM with the following information by June 29, 2018:

1. A detailed map of the terra cotta pipe that formerly carried industrial wastewater to Outfall 001 and former and current Outfall 002. The map or maps should identify where the pipe was cut and capped in November 2017. Additionally, clarify the material used to construct each pipe or segment of pipe that was used to convey industrial wastewater.

2. A camera inspection and/or smoke test of the entire length of the terra cotta pipe to determine the condition of the pipe, with the results provided to DEQ.
3. All documentation relating to the terra cotta pipe, including but not limited to date of installation, detailed historical use of the pipe, maintenance records, the type of process wastewaters and their characteristics discharged through the pipe, documented volume of wastewater discharged, and historic data related to releases or potential releases from the pipe. Please identify when Chemours first became aware that the pipe may be a source of PFAS to the perched zone.
4. The description provided for SWMU #6 – Process Sewer System, in the December 1996 RCRA Facility Assessment (RFA) Report, includes a statement “...Plant personnel and site sewer maps indicate that the pipes are constructed of vitrified clay or steel...”. The February 1998 Confirmatory Sampling (CS) Workplan states “... personnel and site sewer maps indicate that the pipes are constructed of reinforced concrete, vitrified clay, and steel...”. In addition to the terracotta (vitrified clay) pipe that carried process wastes from the Nafion area to the WWTP, Chemours should determine if there are additional terracotta (vitrified clay) or reinforced concrete pipes that currently or historically carried process wastes from other areas of the plant to the WWTP, sumps, or outfalls. If additional terracotta or concrete pipes are found that carried process wastes, these pipes should also be investigated for releases of PFAS.
5. An updated flow diagram showing where the wastewater is collected now and how it gets to a storage tank/rail car for disposal.
6. An analysis showing the rate at which water leaks from (a) the sedimentation ponds, (b) the Nafion ditch and (c) the terra cotta pipe to the Perched Zone.
7. An estimate of the total volume of the Perched Zone.
8. Conduct and report on an additional round of sampling for the groundwater wells in the area of the Perched Zone for the same compounds reported in the March 29, 2018 Revised Additional Site Assessment Report.
9. Prepare a work plan for the next round of onsite groundwater sampling at all onsite wells for the same compounds reported in the March 29, 2018 Revised Additional Site Assessment Report.
10. As a part of the Perched Zone sampling report identified in item 8 above, submit a work plan for additional wells to be added to fully characterize the impacts of the terra cotta pipe on the Perched Zone.

Please let me know if you would like to discuss these issues further or require any clarification.

Sincerely,



Bud McCarty, Head
Facilities Management Branch
Hazardous Waste Section
Division of Waste Management, NCDEQ

EC: US EPA Region 4
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