The Chemours Company FC, LLC
910-678-1213
22828 NC Hwy 87 W
Fayetteville, NC 28306-7332

VIA EMAIL December 11, 2017

Mr. A. Trent Allen
NC DEQ Division of Water Resources
225 Green Street
Suite 714
Fayetteville, NC 28301

RE: Notice of Potential Leak of HFPO Dimer Acid
NPDES Permit No. NC0003573
Chemours Company-Fayetteville Works
Bladen County

Dear Mr. Allen:

The Chemours Company FC, LLC ("Chemours") hereby notifies the Department of Environmental Quality ("DEQ") of a very small potential leak of HFPO Dimer Acid from secondary containment at the Fayetteville Works on or around December 9, 2017. As explained further below, Chemours is making this report (i) even though the incident did not result in the exceedance of any applicable reportable quantity, (ii) even though reporting is not required by any applicable permit or regulation, but (iii) in the interests of cooperation and transparency given DEQ's ongoing focus on the handling of HFPO Dimer Acid at the Fayetteville Works. In that regard, Chemours conservatively estimates that the total mass of the potential leak of HFPO Dimer Acid was less than 0.00000036 pounds and certainly less than 0.000033 pounds.

Please find below a summary of the incident, the remedial steps undertaken, and an explanation of the estimated quantity of the leak. Please note that Chemours continues to investigate this incident and will supplement or revise this notice as necessary. Chemours also recommends that DEQ and Chemours discuss further reasonable parameters around reporting leaks of HFPO Dimer Acid and its chemical precursors given the absence of any applicable regulatory or permit requirements on reporting such leaks.

Summary of Leak

Prior to September 15, 2017, effluent from the Fayetteville Works' Cell Lab was sent to the Wastewater Treatment Plant ("WWTP"). As explained previously to DEQ, on September 15th, Chemours ceased sending the Cell Lab effluent to the WWTP and instead began to segregate it for offsite disposal.

The Cell Lab effluent is segregated by diverting the effluent to one of two 550 gallon totes located outdoors and surrounded by secondary containment with estimated capacity of 1,436 gallons. It has generally taken approximately 3 days to fill one of these totes, at which time the facility has directed any additional effluent to the second tote and has had a third party contractor vacuum out the contents of the first tote.

It appears that the fill rate for these totes was accelerated in recent days due to both the use of these totes to collect additional streams (e.g., lab sinks and certain non-contact cooling water) in order to comply with DEQ's November 16th notice and a significant rain event on Friday, December 8th. As a result, although the facility first began filling the second tote on the afternoon of Friday, December 8th, around midnight Friday (December 8th) and into Saturday (December 9th), which was far less than three days after the filling of the second tote had begun, facility personnel observed that one of the totes was overflowing and there was water in the secondary containment. In response, the facility ceased the flow of Cell Lab effluent to the totes. Around 8am on Saturday (December 9th), facility personnel observed what they described as a small leak in the secondary containment resulting in water leaving secondary containment.

Summary of Remedial Steps Undertaken

When the leak was found, facility personnel put a small piece of plastic tubing into the hole and this stopped the leak. The site contacted the third party contractor to vacuum out the contents of the secondary containment and the totes. The third party contractor arrived at approximately 8:20am and had completed removing the contents around approximately 8:30am. Once the containment area was pumped out, facility personnel went back and glued the plastic tube into place.

While that was occurring, facility personnel checked the pH of the leak (pH of approximately 13) and of the water in the nearby storm water ditch (pH of approximately 7). Thereafter, facility personnel removed rocks and soil in an area about 4 feet wide and 12 feet long to a depth of approximately 4-6 inches in the area outside of secondary containment where they believed the leaked material had flowed. They did not stop digging until they obtained a neutral pH reading. In doing so, they did not have to dig all the way to the nearby storm water ditch, as the pH became neutral before getting to the ditch. Therefore, the facility personnel concluded that the leaked material did not reach the ditch. Personnel also collected samples in the storm water ditch on either side of the secondary containment and these samples are being analyzed for HFPO Dimer Acid. Chemours will provide DEQ the analytical results once they are available.

Chemours is today replacing the secondary containment. The Cell Lab will remain down (*i.e.*, will not produce effluent) while Chemours continues to investigate this incident, replaces the secondary containment, and implements solutions to prevent a recurrence. One preventative measure Chemours will implement is to direct the vacuuming of a filled tote promptly upon its becoming full.

Estimate of Amount of HFPO Dimer Acid in the Leak

Chemours does not have data measuring the volume of either the Cell Lab effluent or the leak or quantifying the concentrations of HFPO Dimer Acid therein. However, Chemours can estimate that any amount of HFPO Dimer Acid contained in the leak would have been infinitesimally small. Based on visual observation, facility personnel estimated the total volume of leaked material at no more than 50 pounds. That material consisted of Cell Lab effluent mixed with rainwater. The Cell Lab effluent would have contained 30% sodium hydroxide, and some small amount of HFPO Dimer Acid. Previously, the highest concentration of HFPO Dimer Acid measured in the Cell Lab effluent had been 7,200 ppt. The concentration in the leaked material was almost certainly substantially less than that, in part because of the mixture with rain water, but even if the entire 50 pounds contained 7,200 ppt of HFPO Dimer Acid, the mass of HFPO Dimer Acid leaked would have been approximately 0.00000036 pounds. Even if one assumed (contrary to visual observations of the leak) that an entire 550 gallon tote containing 7,200 ppt of HFPO Dimer Acid leaked out of secondary containment, the mass of HFPO Dimer Acid leaked would have been approximately 0.000033 pounds.

As noted, Chemours took aggressive action to capture and contain the leaked material so it would not reach the nearby storm water ditch. Moreover, even if leaked material had reached the ditch, the topography of the site is such that all of the material may not have reached Outfall 002.

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Chemours continues to investigate this incident and will supplement or revise this notice as necessary. In addition, Chemours promptly will provide DEQ the results of the storm water ditch sample described above and will continue to provide DEQ the results of Chemours' recurring Outfall 002 sampling. Please note that, due to the rain event occurring at the time of this leak, it may be difficult to estimate the extent (if any) that this leak influenced the forthcoming Outfall 002 sample results, as opposed to the fluctuations in Outfall 002 sample results Chemours has observed (and shared with DEQ) during rain events.

If you have any questions or request additional information, please contact me at christel.e.compton@chemours.com or (910) 678-1213.

Sincerely,

Christel Compton
Program Manager

CC (via email):

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