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

VIA EMAIL

January 15, 2018

Mr. 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 Trent Allen:

The Chemours Company FC, LLC ("Chemours") hereby notifies the Department of Environmental Quality ("DEQ") of a spill that was contained on the asphalt/concrete at the Fayetteville Works on January 14, 2018 that may have involved a small quantity of HFPO Dimer Acid. 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 HFPO Dimer Acid that may have been included in the water spilled was approximately 0.000226 pounds to the asphalt/concrete.

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 or spills that involve (or may involve) HFPO Dimer Acid and its chemical precursors given the absence of any applicable regulatory or permit guidance on reporting such leaks.

Summary of Leak

On January 14, 2018, a tank trailer was being loaded with waste water from the Diversion Tank, which is outside of the loading area. The trailer was smaller than the typical trailer loaded at our facility. It appears that the trailer size was 5,500-gallons versus the nominal 7,000-gallon trailer that is generally used. The calculation used by the Central Control Room ("CCR") is for 7,000-gallon trailers. Therefore, the amount of wastewater sent through the flow meter to the trailer was an amount that may have been in excess of the appropriate level for the truck size (with a margin for error). Wastewater was observed coming out of the overflow piping and there was a spill of approximately 10 gallons of process wastewater (pH 10) onto an asphalt/concrete surface. No material reached the soil/rocks.

Summary of Remedial Steps Undertaken

Within a minute of the spill, the Incident Commander placed the containment pool, that is normally kept under the loading hose, under the overflow pipe. The area was vacuumed up by an on-site consultant and spill x was used to get up residual material off the asphalt/concrete. The area was then rinsed again with the contractor vacuuming up the rinsate, reducing the possible effect of residual material reaching public waters.

Additional actions taken include:

- Enhancing loading protocols to help ensure the load amount is tailored for different trailer sizes;
- Placing a container under the trailer overflow pipe; and
- Implementing steps to ensure personnel loading the trailers verify the size of the trailer and communicate that to the CCR before loading begins. The CCR will then set the flow meter based on the permissible load for that size trailer.

Estimate of Amount of HFPO Dimer Acid in the Leak

Based on visual observation, facility personnel estimated the total volume of spilled material onto the concrete at no more than 10 gallons (83.4 pounds). Because the wastewater could have contained wastewater from any and all of the processes, the highest value ever measured back in July 2017 in the Nafion® Composite Sampler was used to calculate the potential amount of HFPO Dimer Acid that may have been included in the spilled water. Using that calculation methodology, the mass of HFPO Dimer Acid that may have been included in the water that spilled to the asphalt/concrete would have been approximately 0.000226 pounds.

As noted, Chemours took prompt and aggressive action to capture and contain the spilled material, reducing the chance that any HFPO Dimer Acid present in the spilled water would reach public waters.

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Chemours continues to investigate this incident and will supplement or revise this notice as necessary. In addition, Chemours continues to provide DEQ the results of Chemours' recurring Outfall 002 sampling. Please note that, during the next rain event, it may be difficult to estimate the extent (if any) that this spill may influence the forthcoming Outfall 002 sample results, as opposed to the fluctuations in Outfall 002 sample results Chemours has observed (and shared with DEQ) during other 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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