

The Chemours Company Fayetteville Works 22828 NC Highway 87 W Fayetteville, NC 28306

March 25, 2022

Sushma Masemore, P.E. Deputy Assistant Secretary for Environment & State Energy Director 1601 Mail Service Center Raleigh, NC 27699-1601 sushma.masemore@ncdenr.gov

## Re: Submission of Barrier Wall and Groundwater Extraction System 90% Design Report, Chemours Fayetteville Works, Fayetteville, NC

Dear Ms. Masemore,

Chemours is submitting the Barrier Wall and Groundwater Extraction System 90% Design Report. This report has been prepared pursuant to Paragraph 3.b in the Addendum to Consent Order Paragraph 12 entered by the Bladen County Superior Court on October 12, 2020, which is incorporated into the terms of the Consent Order entered February 25, 2019 between Chemours and the North Carolina Department of Environmental Quality (DEQ) with the Cape Fear River Watch (CFRW). The report was prepared by Chemours's consultants, Geosyntec Consultants of NC, P.C. and GEOServices, LLC.

The core elements of the design presented in this report were previously included in the 60% Design Report submitted August 13, 2021, which was approved by DEQ. The 90% Design Report contains additional and more detailed design parameters and minor modifications based on additional data and DEQ comments. The core elements remain a barrier wall over 6,000 feet in length (with the same contours as in the 60% Design Report), hydraulic containment of groundwater and seeps behind the wall and to the north of the wall along Willis Creek, and the installation of a water treatment plant to treat groundwater and Seep water as required in the Consent Order Addendum.

Additional items included in this report include a Barrier Wall Construction Quality Assurance Plan and a Remedy Performance Monitoring Plan (PMP). These plans were requested by DEQ in comments on the 60% Design Report. Chemours submitted these plans to DEQ in January, 2022. On February 15, 2022 DEQ provided additional comments on these plans. Chemours submitted a Response to Comments on these plans on March 17, 2022 and, as part of today's submission of the 90% Design Report, is incorporating changes to both plans as proposed in the Response to Comments from March 17, 2022 with one exception. Chemours had proposed that river transect sampling identified by DEQ be included in the PMP in conjunction with other sampling to show performance of the barrier wall and extraction system remedy. However, as DEQ has included a river transect sampling requirement in the draft NPDES permit for the water treatment system, such sampling has been removed from the PMP.

## If you have any questions, please contact me at Dawn.M.Hughes-1@Chemours.com.

Sincerely,

Dan M. Hefen

Dawn M. Hughes Plant Manager Chemours – Fayetteville Works

Enclosure

Barrier Wall and Groundwater Extraction System 90% Design Report

Cc:

Sushma Masemore, DEQ William F. Lane, DEQ Francisco Benzoni, NC DOJ Michael Abraczinskas, DAQ Michael Scott, DWM Richard Rogers, DWR Julie Grzyb, DWR Sergei Chernikov, DWR David C. Shelton, Chemours John F. Savarese, WLRK Kemp Burdette, CFRW Geoff Gisler, SELC Todd Coomes, Chemours Kevin Garon, Chemours Christel Compton, Chemours Joel Gross, Arnold & Porter Thomas Santoro, Arnold & Porter Alyssa Wright, DEQ Holly Ingram, DEQ