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INTERIM SEEP REMEDIATION SYSTEM PLAN

Chemours Fayetteville Works

Prepared for

The Chemours Company FC, LLC 22828 NC Highway 87

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USGS United States Geological Survey

1. INTRODUCTION

1.1 Background

Geosyntec Consultants of NC, PC (Geosyntec) has prepared this Interim Seep Remediation System Plan ("Interim Plan") on behalf of The Chemours Company FC, LLC (Chemours) to provide a design basis for the flow-through cells that are to be installed as the interim seep remediation system at four groundwater seeps at the Chemours Fayetteville Works Site (Figure 1; the Site). Pursuant to requirements of Paragraph 2 of the Addendum to Consent Order Paragraph 12 (CO Addendum), these interim systems shall intercept dry weather flow of Seeps A, B, C and D and achieve a minimum per- and polyfluoroalkyl substances (PFAS) removal efficiency of 80 percent (%) of the intercepted flow at each seep. This will be assessed on a monthly average basis using the indicator parameters hexafluoropropylene oxide dimer (HFPO-DA, i.e. GenX), perfluoromethoxypropyl carboxylic acid (PMPA), and perfluoro-2-methoxyaceticacid (PFMOAA).

This Interim Plan has been prepared to provide: (i) a design basis that documents the anticipated effectiveness and implementation of the proposed remedy; (ii) an operation and maintenance plan that details how the systems will be managed and monitored after construction; and (iii) a sampling plan that will evaluate the performance of the systems at achieving the PFAS removal goal.

1.2 Seep Characterization

The following sections discuss critical data inputs to the design: (i) Seep flow rates; (ii) Seep PFAS concentrations; and (iii) Seep water quality. This section focuses on the sources of these data inputs, and their role in design; design details are discussed in Section 2.

1.2.1 Flow Rate

The flow rates at each seep have been measured in various stages beginning in January 2019. Flumes have been installed at the terminus of each seep, as close as practical to the confluence of the Cape Fear River, as shown in Figure 2. For the larger seeps, notably A and B, several additional flumes have been installed at various tributaries that feed the main channel, and at various locations along the main channel itself. To determine the dry weather base flow at each seep, the dataset has been reduced to remove inundation events (when the Cape Fear River elevation rises and fills the seep channel, submerging

the flume), unreliable data¹, and wet weather events². The evaluation methodology and results are detailed in Appendix A. The summary table below presents the statistical results for each seep, including 25th percentile (considered seasonal low flow), the median (i.e. the $50th$ percentile flow) and $95th$ percentile of dry weather flow (considered seasonal high flow). The $95th$ percentile value will be used as the design basis flow rate, which is used in the design to estimate the usage rate of treatment media, size the media beds accordingly to a reasonable changeout frequency, and account for hydraulic head loss through the system.

1.2.2 PFAS Loading Rate

The flume locations discussed above have been routinely sampled for Table 3+ compounds. The following table summarizes the median concentrations of the three indicator compounds for each seep terminal location, based on sample data from February 2019 to April 2020. These values have been used in conjunction with the design basis flow rate and isotherm column studies to estimate the potential adsorbent utilization rate (AUR) at each location.

¹ Unreliable data include times when the data logger may have been moved by inundation events from the stilling well in the flume and periods of potential low bias potentially caused by seep flow being diverted around the flume rather than passing through the flume.

 2 Flow measurements within 24 hours after a rain event are considered wet weather flow.

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Notes: February 2019 through April 2020 data period. The number of samples varies by seep and by compound, ranging from 7 (for Seep D, all compounds) up to 10 (for Seep A, PMPA and PFMOAA).

1.2.3 Water Quality

During routine sampling of the seeps, water quality parameters were also measured in the field using calibrated water quality instruments, or in the case of dissolved iron, with additional laboratory analysis. The table below summarizes the most recent water quality data available for each seep. These data are utilized for selecting compatible materials for the remedy construction, evaluating the potential adverse effects of naturally occurring dissolved metals, and selecting design components that may mitigate these effects.

Notes:

Analytical laboratory data for Total Dissolved Iron from February 2019 represent the average across all Seep measurement locations.

All other field measurement parameters (reported as the average of a two-day sampling period in April 2-3, 2020) were collected from the furthest downstream location to the Cape Fear River.

NM = not measured (an updated sampling event for all of the above is planned for third quarter 2020)

NTU = nephelometric turbidity units

 $mg/L =$ milligrams per liter

2. DESIGN AND PLACEMENT PLAN

2.1 Interim Seep Remediation System Approach

The first interim seep remediation system, a flow-through cell, will be installed at Seep C (herein referred to as "the System"), and results from construction and operation will inform the design and installation of interim seep remediation systems at the remaining seeps (i.e., A, B, and D). This Interim Plan provides design details specific to the System, but narrative discussion of design and operation herein applies to all the flow-through cells, which will be sized to fit each seep based on the flow rates and morphology of the seep channel (see topographic maps in Figures 3A-3D). The 30% design drawings (Appendix B) and hydraulic and structural calculations (Appendix C) have been developed specifically for the Seep C installation, and are subject to changes based on final design, and from permitting input provided by the appropriate regulatory agencies.

As detailed in Sections 2.8 and 6, final designs for Seeps A, B, and D are anticipated to be submitted to United States Army Corps of Engineers (USACE) and North Carolina Department of Environmental Quality (NCDEQ) for permitting purposes by October 2020.

2.2 System Overview

The flow-through cells have been designed to achieve the following objectives, which are based upon Paragraph 2(a) in the CO Addendum:

- Intercept and hydraulically transmit base flow (during dry weather flow, i.e. groundwater) through the treatment media;
- Remove at least 80% of PFAS indicator compounds from intercepted base flow on a monthly average basis;
- Minimize base flow bypassing the flow-through cells;
- Maintain operation during higher flows (i.e., safely bypass stormwater flow without damaging the flow-through cells); and
- Minimize downtime due to clogging or fouling.

These objectives will be met by impounding seep flow³, which will generate sufficient hydraulic head (approximately six feet) to allow the base flow to enter the flow-through cell and then percolate downward through granular activated carbon (GAC) beds in series and treat the PFAS impacts via adsorption. Treated water will be returned to the stream

³ An earthen dam is shown in the design drawings. Sheet piling is also being evaluated as a means to impound flow.

channel, and the GAC media will be periodically replaced. A spillway and weir will allow for safe bypass and flow measurement of additional flow volume from storm events (Drawing C-02). The System's general flow control process is as follows:

- Impounded water will flow from the impoundment basin through a rectangular opening into an inlet chamber where the seep flow will pass through a 4-ft thick gravel layer into the influent stilling basin (ISB). Flow control valves on inlet manifolds will allow for distribution to one of two GAC filter beds (depending on the lead/lag duty cycle) operating in series for improved treatment efficiency and reliability.
- Water will flow via gravity through the lead GAC filter bed and percolate into underdrains at the bottom of the bed, which will collect the water into a common manifold within an intermediate transfer basin. Water will then flow over another weir from the transfer basin into the lag GAC filter bed, again flowing via gravity to the bottom. As before, water will percolate into underdrains, collect into a similar manifold in the transfer basin, and then discharge into an effluent stilling basin.
- Water will flow over a weir from the effluent stilling basin into the discharge basin, where it will exit the System into the downstream seep channel (Drawings C-03 and C-04). A fiberglass grating platform will be installed over the System to provide operator access to flow control valves, weirs, and measurement/sampling points (Drawing C-05).

A Process Flow Diagram (PFD) that presents the overall System operation and operational modes is provided in Drawing D-01. Four operational modes exist: (i) Filter Bed-1 as lead and Filter Bed-2 as lag; (ii) Filter Bed-2 as lead and Filter Bed-1 as lag; (iii) only Filter Bed-1 operating (changeout of Filter Bed-2 GAC); and (iv) only Filter Bed-2 operating (changeout of Filter Bed-1 GAC).

The major components of the System, and a brief description of their design and function, are provided below.

- Impoundment Basin: The impoundment basin's function is to provide sufficient hydraulic head for the System to overcome head losses through the GAC media. It will be constructed with either earthen berms or sheet piling; a riprap armored slope will be installed on the front and back faces with either method.
- Inlet Channel: Impounded water enters the System through a rectangular inlet channel that can be shut/opened using a removable weir plate. During normal System operations, the weir plate will be removed permitting impounded water to enter the Inlet Chamber to be processed through the System. If non-routine

System maintenance is required, the weir plate will be installed and the elevation of impounded water will rise until it reaches the elevation of the Bypass Spillway (see below), facilitating seep flow bypass of the System.

- Inlet Chamber: The Inlet Chamber pools impounded water atop a gravel layer through which System flow is funneled into the ISB. The head differential between the Inlet Chamber and the ISB provides the driving force for flow through the Gravel Layer.
- Gravel Layer: A Gravel Layer, comprised of #5 stone, will be installed between the Inlet Chamber and the Influent Stilling Basin. The Gravel Layer will act as a "roughing filter" to minimize particulate loading to the GAC filter beds. Further, the gravel media provides additional surface area for iron and manganese to precipitate if the chemical equilibrium of dissolved species shifts towards conditions favorable for precipitation. The gravel layer will provide a robust filter media to protect the GAC filter beds.
- Influent Stilling Basin: Flow passing through the Gravel Layer collects in the ISB and will be diverted into the lead GAC filter bed through flow control devices (FCDs). The status of the FCDs (i.e., open or closed) for the different System operation modes is provided in Drawing D-01. The ISB will be equipped with a vertical flow baffle which will direct flow from the #5 stone layer into the primary ISB compartment that supplies flow to the FCDs.
- GAC Filter Beds: GAC filter beds will treat PFAS present in the System influent via adsorption. They will contain GAC media covered by a geotextile and underlain by a #5 stone draining layer. An underdrain collection system constructed of 6" perforated PVC pipe will be installed within the #5 stone draining layers; the underdrain collection systems will facilitate conveyance of water from the stone draining layers to the transfer basin manifolds. GAC was selected over ion exchange resin for several reasons, most notably due to the smaller particle size and lower hydraulic conductivity of the resin, which would pose hydraulic head losses that would not be practical to overcome.
- Transfer Basin: A transfer basin, situated between the two GAC filter beds, will allow for operation of the GAC filter beds in series. The transfer basin is a rectangular chamber that will accumulate seep flow that has passed through the lead GAC filter bed and divert it to the top of the lag GAC filter bed. The installation of two manifolds and two overflow weirs will provide the ability to reverse the flow path when the lead and lag filter bed positions are switched (i.e., when the GAC in the lead bed is spent and changed out, and the lag bed is placed in the lead position). As shown in the Design Drawings, each GAC filter bed is

connected to the transfer basin via two flow control features: 1) its underdrain collection system and its dedicated manifold which is equipped with two FCDs; and, 2) a dedicated overflow weir. For the manifold plumbed to filter bed in the lead position, the FCDs will be set such that water collected from the underdrain system will be diverted into the transfer basin chamber. The overflow weir between the lead filter bed and the transfer basin will be closed whereas the overflow weir between the lag bed and the transfer basin will be open. The water that accumulates in the transfer basin will be diverted into the lag filter bed via the open overflow weir. Water collected from the underdrain system of the lag filter bed will be diverted to the effluent stilling basin by the manifold plumbed to the lag filter bed. The heights of the overflow weirs will be set to maintain saturated GAC conditions in the lead filter bed.

- Effluent Stilling Basin: The effluent stilling basin will consolidate treated effluent from the lag GAC filter bed prior to discharge. It utilizes a weir to maintain sufficient water elevation in the lag GAC filter bed so they do not go dry during low flow events. The effluent stilling basin will transfer effluent to a common discharge basin.
- Discharge Basin: A common discharge basin will receive treated effluent from the effluent stilling basin and discharge treated effluent from the System, through an outlet pipe to the natural seep channel.
- Platform: A fiberglass grate platform will be installed over the full flow-through cell as a safety measure, with handrails on all sides except for the maintenance platform. The grating will include ports and/or access doors to allow for operator access to the flow control elements and sampling/measurement equipment, and for vacuum trucks to replace the GAC media.
- Maintenance Platform: The maintenance platform will serve as an area where support vehicles and personnel can be staged to support the maintenance and inspection of the System (e.g. GAC changeouts).
- Bypass Spillway: The bypass spillway will allow for a controlled release of excess flows, which exceed the design capacity of the System (e.g. during large rainfall events). The bypass spillway conveys flows around the System and to the downstream stream bed. A rectangular weir will be incorporated into the spillway to allow for flow measurement.
- Effluent Slope: The effluent slope's function is to provide structural stability to the System. It will be constructed with an earthen, riprap armored slope.

2.3 Hydraulics

The System has been designed to manage a range of seasonally variable flow, as measured with the Seep C flume over the previous 18 months. The System will impound and regulate inflow of the Seep C discharge, and in doing so, generate sufficient hydraulic head to overcome losses associated with the operational components outlined in this section (e.g. GAC media, piping, etc.).

The System will be installed such that the Inlet Channel crest is installed at 40.85 feet mean sea level (ft MSL). This will result in the creation of an impoundment basin with the same elevation. During routine operation, the System is designed to convey a minimum of 76 gpm through the ISB and into the System's GAC filter bed. When Seep C flows increase and the elevation of the impoundment basin is approximately 0.5 ft above the Inlet Channel crest, at an elevation of 41.35 ft MSL, water will begin to flow through the bypass spillway, so as not to overwhelm the System's ability to transmit flow.

The flow rate that results in this spillway elevation can be adjusted by manipulating the FCDs in the filter beds (e.g., closing or throttling valves and creating more backpressure). To maintain the longevity of the GAC, the maximum flow through the system will be maintained at the seasonal high base flow value to the extent possible. The extents of the impoundment basin under normal operating conditions (between 40.85 and 41.35 ft MSL) are provided on Drawing C-02, and indicate that there should be no ponding upstream of the roadway near Seep C.

Head loss calculations, provided in Appendix C, consider various operational scenarios depending on seasonal flow rate, and changes to the integrity (cleanliness) of the GAC media. In total, eight scenarios were modeled, with a range of four flow rates (between 30 and 76 gpm) and two conductivity values for the GAC media (clean, unfouled Calgon F400, and fouled media where hydraulic conductivity is reduced by a factor of 4). Contributions to head loss include filtering through the gravel layer separating the inlet chamber and the ISB, geotextile layers, and GAC media; and restrictions through manifold piping, most notably the ISB distribution manifold to the filter beds. The calculations demonstrate that in the worst-case scenario (maximum base flow through fouled GAC media), the filter beds will function hydraulically.

2.4 Treatment Efficiency

The System was designed to have a GAC filter bed of sufficient dimensions to allow for an empty bed contact time (EBCT) of between 30 to 60 minutes, assuming the design flow rate of 76 gpm. A flow of 76 gpm through the 10 ft x 10 ft x 3 ft GAC filter bed results in an estimated EBCT of approximately 30 minutes, as presented in Appendix C. The EBCT at the median flow rate of 42 gpm results in an estimated EBCT of approximately 53 minutes.

Results from adsorption isotherm studies were used to estimate sorption rates to the GAC, the carbon utilization rate, and the GAC changeout frequency. The isotherm study results and relevant calculations are provided in Appendix C. At the median flow rate of 42 gpm, it is estimated that approximately 30,000 pounds (lbs) per year of GAC will be required for Seep C, corresponding to a GAC changeout frequency of approximately 91 days.

Treatment efficiency and breakthrough will be monitored through routine influent, midpoint, and effluent sampling, as described in Section 3.4. The rate of breakthrough and carbon utilization will be monitored to evaluate if the design needs to be modified for the remaining seeps.

2.5 Geotechnical and Structural

Calculations were performed to estimate potential settlement of the structures in the seep channel, the potential buoyant effects during a flooding condition, and to design the thickness and reinforcement requirements for the concrete slab and walls. Calculations are provided in Appendix C.

Settlement: To evaluate the engineering parameters of the foundation soils at the interim remedial seep channel locations, a Cone Penetrometer Testing (CPT) sounding was advanced July 28-29, 2020 at each seep location to a minimum depth of 40 feet. CPT is a direct push technology that allows for continuous data collection (every 2 inches) for tip resistance, sleeve friction, and dynamic pore pressure.

At this time of this report, the CPT data were not available for evaluation, therefore assumed engineering parameters were used in the calculations. Using conservative assumptions, a maximum of 8 inches of uniform settlement could develop during construction. This analysis will be updated once the CPT data is fully evaluated; it is anticipated that the expected settlement will be within design tolerances.

Uplift: During normal operation, the filter beds will have sufficient downward force to provide more than adequate factor of safety based on appropriate safety factors in USACE Engineering Manual 1110-2-2100 (USACE, 2005). Even in an extreme flooding event with the exterior walls fully submerged, the System components (water, GAC, stone, and concrete) will provide sufficient force to overcome buoyant uplift.

Concrete: Load calculations were performed based on potential critical points in the filter beds, for example when a filter bed is drained of GAC and water, while adjoining basins are full of water. Slabs and walls will be constructed of 8" thick concrete, cured to a compressive strength of 4,000 pounds per square inch (psi), with rebar reinforcement as shown in the calculation drawings⁴.

2.6 Resiliency

This section describes how the System has been designed to overcome various adverse conditions that may be encountered during construction and operation:

Underflow: During the course of the geotechnical/civil design for each of the seep locations, underflow will be addressed. The type of underflow prevention method will be dependent on the expected flow rate, the type of impoundment selected, and the subsurface stratigraphy at each individual seep location. The results of the analysis and calculations will be incorporated in the design.

Scouring from High Flow Events: The System is designed to manage the $95th$ percentile flow rate at Seep C. As shown in Appendix A, the dry weather base flow varies both diurnally and seasonally. In addition, wet weather will cause stormwater to enter the seep channel, with flow rate depending on antecedent dry conditions and rainfall intensity. The spillway will allow for flow that exceeds the design basis to safely bypass the filter bed System. Also, riprap will be installed on both slopes to reduce surface water velocities that may be encountered during heavy rain events.

Integrity of GAC media: GAC installed within each GAC filter bed will be bounded by a layer of geotextile. The geotextile installed between the GAC and #5 stone will reduce GAC from settling into the drainage layer and assist in reducing #5 stone loss during GAC changeout. The geotextile installed on top of the GAC will provide initial filtration and protection. Both geotextiles will be secured to the walls of the GAC filter beds.

River Flooding: The Cape Fear River's water level is subject to seasonal variation and dam releases upriver from the Site. For Seep C, a Cape Fear River surface elevation of 38 ft msl or higher is considered the threshold where river inundation begins. This elevation threshold is where river levels can materially affect the operation of the flow through cell. The hydraulic head of water flowing through the flow through cell during low river stages is controlled by the rectangular weir separating the effluent stilling basin and the discharge basin with an elevation of approximately 38 ft msl. Cape Fear River surface levels below this elevation will not affect gradients or flow through the flowthrough cell. River levels above the elevation will reduce the gradient through the flowthrough cell and may potentially reduce flow rates through the system. Based on available data from 2007 to present, the river has been above the Seep C inundation threshold of

⁴ Calculations are provided for cast-in-place concrete structures. Precast concrete structures may be utilized for some or all seep locations to expedite construction schedule in the field.

38 ft msl only about 4% of the time with an average duration above 38 ft msl of approximately 5 days.

When Cape Fear River surface levels rise to or above 40.85 ft msl, the same elevation as the inlet weir, gradients and flow directions in the flow-through cells may potentially be reversed. When Cape Fear River surface elevations rise to or above 41.35 ft msl or greater, the same elevation as the bypass spillway, the Cape Fear River will inundate the impoundment basin and limited flow or no flow will occur through the flow-through cell as the bypass spillway presents less resistance to flow. When the river recedes, any impounded water will then flow through the filter beds as during normal operation provided no damage occurred to the flow-through cell.

The flow-through cell perimeter wall elevation is 42.35 ft msl. Based on available data from 2007 to present, the Cape Fear River has only exceeded this elevation about 1.4% of the time during extreme weather events. Structural calculations (discussed in Section 2.5) were performed to demonstrate that even in this extreme event with the flow-through cell fully under water, there is sufficient downward force to prevent flotation. Additionally, saturated GAC (covered by a geotextile) will have a density greater than water and will remain in place.

Iron Fouling: Based on available water quality data and observations of iron oxidation within the current seep channel, iron fouling is a potential concern for long-term integrity of the GAC media. To mitigate this risk, the riprap armored slope on the influent side of the filter beds was developed to provide oxidation sites for the dissolved iron in the water. Periodic maintenance or replacement of the rip rap may be required. The gravel layer that separates the System inlet chamber and the ISB provides additional surface area for iron and manganese to precipitate, providing additional protection of the GAC filter beds. The gravel layer will provide filtering capabilities which will be resilient to clogging due to the media's high conductivity.

Additionally, the GAC filter beds were sized to require GAC changeouts every few months. It is not anticipated that this is a sufficient timeframe for significant fouling of the media to occur. This relationship between EBCT, changeout frequency, and the extent of iron fouling will be a critical component to monitor during System operation, and the GAC loading/changeout frequency of the remaining flow-through cells may be adjusted upward or downward depending on observations at Seep C.

Debris/Clogging: The System is located in a wooded area; therefore, debris from the tree canopy may fall into the impoundment basin or treatment area. To reduce the introduction of debris from the impoundment basin into the treatment area, a skimming baffle may be installed to keep large, floating debris from entering the ISB. Additionally, to reduce the risk of falling debris entering the treatment area, a deployable protective cover (e.g. allweather tarp) may be used to provide cover and intercept falling debris.

2.7 System Monitoring

The System design includes features to allow for the monitoring of System flow rates, local precipitation, and System performance, as summarized below.

Flow Rates: A pressure transducer will be installed within the Inlet Chamber, which will provide a measurement of the water level in the impoundment; this can be used to measure flow rate through the flow through cell, as well as through the bypass (bypass flows begin when the impoundment height is >0.5 ft above the inlet weir). Flow rates through the bypass spillway can also be recorded during inspection events with the rectangular weir in the spillway that adjoins the flow through cell.

A pressure transducer will also be installed in the Effluent Stilling Basin, to provide a confirmatory measure of flow through the structure, as well as a measurement of head loss through the System.

Transducers can log data at a set frequency (e.g., every 15 minutes) and be downloaded during routine weekly inspections.

Impoundment Height: A United States Geological Survey (USGS) staff gage will be installed within the impoundment for visual measurement of impoundment height.

Precipitation: Precipitation will be monitored by using the existing USGS weather monitoring station at the W.O. Huske Dam (gauge 02105500).

Performance Monitoring: The System's treatment efficacy will be monitored using a combination of dedicated autosamplers and grab samples collected by OM&M personnel. Details of the performance monitoring methods are provided in Section 4.1.

Should other System components need to be monitored in the future, methods and techniques will be developed on a case-by-case basis.

2.8 Permits

The following permits will be required to install the System:

Clean Water Act Section 404 Permit and 401 Certification under USACE and NCDEQ has been determined by those agencies to be required due to wetland and streambed impacts. An onsite agency review meeting was held June 30, 2020 to discuss the flow through cell concept, ongoing design improvements, and anticipated schedules. Per USACE communication from July 29, 2020, an Individual Permit (IP) may be required due to exceeding 300 linear feet of stream disturbances (cumulative for all four seeps); an IP typically requires a public comment period. The stream disturbance for Seep C is less than this threshold, and it has not yet been determined by the agencies whether a

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submittal for Seep C alone would qualify for an IP or a general Nationwide Permit. Subject to this determination, an IP for the Seep C System was submitted August 13, 2020. A modification to this IP is anticipated to be submitted by October 2020 for the remaining seeps.

A Land Disturbance Permit under NCDEQ will be required to permit construction⁵. Erosion and sediment control (E&SC) plans will be prepared in compliance with the latest 2013 updates to the Erosion and Sediment Control Planning and Design Manual and submitted to Bladen County representatives for review. A permit application for Seep C was submitted August 27, 2020.

A No-Rise certification will be required due to the emplacement of fill within the Non-Encroachment Area (NEA) of the floodplain. There is no regulated floodway at the eastern boundary of the Site, as Bladen County did not appear to participate in the National Flood Insurance Program that is managed by the Federal Emergency Management Agency. In communications over the course of August 2020 with County and Regional floodplain administrators within the North Carolina Department of Public Safety (NCDPS), it was confirmed that the proposed flow through cell locations are within the NEA. Hydraulic analyses will be prepared to evaluate if the proposed fill will result in any increase in the flood levels during the occurrence of the base flood. This evaluation is planned to be submitted to Bladen County and NCDPS by mid-September 2020. The analyses will include all four seeps (with conservative assumptions about flowthrough cell sizing) to prepare a comprehensive application.

⁵ Note that work will also be conducted in accordance with the Soil and Material Waste Management Plan prepared by Chemours on July 3, 2020 for work conducted in non-manufacturing areas of the Site.

3. OPERATION AND MAINTENANCE PLAN

3.1 Overview

This section provides information on the System commissioning, routine inspections and operation, and maintenance. This work will be conducted to evaluate how the System is operating as compared to design parameters, so that potential optimizations can be completed. Performance monitoring is discussed in Section 4.

3.2 Commissioning and Startup

The System commissioning will be initiated upon completion of construction and will evaluate whether the System has been constructed as designed and operates as designed. The System commissioning will include: (i) inspecting each component of the System for construction defects; (ii) confirming that all valves are operational; (iii) the construction contractor certifying concrete water tightness; and (iv) introducing potable water to evaluate the piping distribution network and flow paths. It is estimated that approximately 15,000-20,000 gallons of potable water (roughly a half-day test at the design flow rate) will be used to evaluate that the piping distribution network operates correctly and adequately distributes influent into the leading GAC filter bed, and correctly diverts flow through the System. This will also prime the GAC filter beds for Seep C flow.

System startup will commence upon completion of the commissioning. The temporary seep bypass that will have been installed during construction will be removed to allow flow to enter the impoundment basin. Startup testing and monitoring will include:

- time required to fill the impoundment basin;
- horizontal and vertical extents of the impoundment basin;
- distribution of influent over the GAC filter beds;
- scouring or development of preferential pathways through the GAC filter beds;
- time to fill various System components;
- time to discharge; and
- influent flow rate.

Once the System is operating as designed, geochemical parameters will be measured and grab water samples will be collected from the inlet weir (influent), transfer basin (partially treated effluent), and discharge basin (effluent) to evaluate the initial operating conditions.

It is anticipated that System startup may take one to two days to complete. The commissioning and startup will be documented by OM&M personnel.

3.3 Inspections and Maintenance

Per the CO Addendum, inspections will occur on a weekly basis (minimum) and include regular inspections after rain events of 0.5 inches or greater within a 24-hour period. An Inspection Form will be filled out by OM&M personnel during each inspection. The routine inspections will include, but are not limited to:

- documenting the System duty cycle (i.e., lead/lag orientation of the GAC filter beds);
- measuring operational parameters, notably the influent and bypass (if any) flow rate and impoundment basin height;
- documenting any potential observed issues, such as sediment accumulation in the impoundment basin, structural problems, GAC fouling, and debris that is impairing flow through the System;
- inspecting the autosamplers (see Section 4.1 for details); and
- photographing the conditions observed, including any bypass flow.

Precipitation will be monitored remotely by using the existing USGS weather monitoring station at the W.O. Huske Dam (gauge 02105500). This station is approximately 1,200 feet from Seep C and records precipitation data every 15 minutes.

Routine preventative maintenance will be performed as needed during the inspections, and will include:

- removing debris (e.g., tree limbs) blocking the inlet weir or other feature
- cleaning and maintaining pressure transducers;
- cleaning and maintaining the autosamplers;
- general good housekeeping activities.

Some non-routine issues may be identified during inspections that cannot be managed by the operator, and will require coordination of equipment, materials, and other personnel. These could include:

- cleaning/clearing/maintaining/replacing of the System's protective cover and the geotextiles installed over the inlet basin #5 stone and GAC filter beds;
- repairing or replacing any flow through cell elements that are damaged;
- managing any accumulated sediment that settles upstream of the weir, and in the impoundment basin; and
- cleaning/clearing valves, notably the inlet manifold diaphragm valves.

Note that many of these maintenance activities could be scheduled to occur at the same time as GAC changeouts, to take advantage of equipment mobilization and limit downtime.

Some non-routine repairs may require an adjustment to the operating protocol. For example, if a storm damages one of the GAC filter beds, the System may have to temporarily operate with only a single GAC filter bed; or if significant storm damage requires the inlet weir to be closed, all seep flow will temporarily bypass through the spillway. If this occurs, Chemours will follow the reporting requirements in Section 5.

3.4 GAC Changeouts

As discussed in Section 2.4, GAC changeout frequencies were estimated using isotherm adsorption data, and the calculations are provided in Appendix C. It is estimated that the Seep C changeout frequency for one GAC filter bed will range between approximately 50 and 91 days (76 and 42 gpm, respectively). GAC changeouts will be conducted based on results from the System's influent, midpoint, and effluent performance monitoring data. Once initial PFAS indicator compound breakthrough has been observed, the sampling frequency may increase; the changeout will be scheduled for when the effluent from the lead GAC filter bed reaches approximately 30% of the influent concentration. By scheduling the changeout at this point, the actual changeout will occur before the midpoint concentration is 50% of the influent concentration. During the changeout operation, flow will be directed into the lag filter bed only, which will ultimately become the lead bed; after the GAC has been replaced in the lead filter bed, it will be put in service as the lag filter bed. The exact timing will be evaluated during the initial operation and is subject to optimization. Spent GAC will be removed with a vacuum truck that is staged at the maintenance platform.

3.5 Interim Remediation System Optimization

During System operation, results from the routine OM&M events (inspections, maintenance, and operation and performance monitoring) and non-routine inspections will be used to evaluate the System's operational efficacy. These evaluations will be used to inform potential optimizations to the System as well as the design and installation of the interim remedial systems to be installed at Seeps A, B, and D. The operational components and elements that will be monitored and evaluated may include:

- the construction of the System in an active seep channel and floodplain, and the bypass of the active seep's flow during construction;
- sediment accumulation and management within the impoundment basin and within the System;
- influent distribution from the ISB to the GAC filter beds;

- the mechanics and frequency of GAC changeouts;
- the mechanics for diverting and changing the effluent flow paths; and
- how the System manages increased seep flow rates during storms and elevated Cape Fear River stages.

Any proposed optimization to the Seep C System will be included as part of the bimonthly (once every two months) report discussed in Section 5.

4. SAMPLING AND EFFECTIVENESS PLAN

4.1 Operational and Performance Monitoring

Operational and performance monitoring of the System will be completed on a regular basis to evaluate:

- PFAS removal efficiency;
- breakthrough of PFAS compounds between GAC filter beds, using grab samples on an as needed basis;
- water quality parameters specified in the CO Addendum;
- potential effects of 0.5-inch rain events on PFAS concentrations; and
- flow measurements, via pressure transducers in the flow-through cell (which provide influent flow into the System and through the spillway). Flow rates through the bypass spillway can also be recorded during inspection events with the rectangular weir in the spillway that adjoins the flow through cell.

The operational and performance sampling plan is detailed in Table 1. Composite samples will be collected using portable, battery-powered autosamplers (e.g. ISCO sampler) consistent with other Site assessments. Sample aliquots will be collected in a common container where they will mix and be composited together. At the end of the sampling period, the OM&M personnel will fill laboratory-supplied sample containers from the common container within the autosampler. The autosamplers will be inspected during each inspection and maintenance event to evaluate if they are properly collecting samples and have suitable battery power remaining. Sampling will be conducted in accordance with the PFAS Quality Assurance Project Plan (AECOM, 2018). Any adjustments made to address potential deficiencies (e.g. low battery power, etc.) will be documented on the Inspection Form.

4.2 Effectiveness

System effectiveness defined by the percentage removal of the combined concentrations of the three indicator parameters (HFPO-DA, PFMOAA and PMPA) shall be determined on a monthly average basis for each flow-through cell system at each seep using composite influent and effluent samples as described in Table 1 and above in Section 4.1. Proposed influent and effluent autosampler locations are noted in Drawing C-03 of Appendix B.

The system effectiveness calculation uses volume weighted concentrations of the influent and effluent samples to calculate the percentage of mass removal. Volume weighted concentrations were developed in the event that either the influent and effluent autosamplers have different compositing durations or that the two composite sampling

periods in the month have different durations (e.g. 14 days and 10 days). Both circumstances could arise due to a potential equipment malfunction or severe weather event. Weighting by volume provides a representative assessment of mass present in both the influent and effluent over time; samples corresponding to greater flow volumes will have a proportionately higher weight. However, it is anticipated that during normal operation of the system, the compositing durations will be the same and the effectiveness will be calculated using Equation 1 below:

Equation 1: System Effectiveness

$$
System Effectiveness = \left(1 - \frac{c_{eff}}{c_{inf}}\right) \times 100\%
$$

= $\left(1 - \frac{\sum_{m=1}^{M} \sum_{i=1}^{i=3} c_{eff,m,i} \times w_m}{\sum_{n=1}^{N} \sum_{i=1}^{i=3} c_{inf,n,i} \times w_n}\right) \times 100\%$
= $\left(1 - \frac{\sum_{m=1}^{M} \sum_{i=1}^{i=3} c_{eff,m,i} \times \frac{V_m}{\sum_{m=1}^{M} V_m}}{\sum_{n=1}^{N} \sum_{i=1}^{i=3} c_{inf,n,i} \times \frac{V_n}{\sum_{n=1}^{N} V_n}}\right) \times 100\%$

where,

 c_{eff} is the volume weighted effluent concentration for a given month;

 c_{inf} = is the volume weighted influent concentration for a given month;

- m = represents an individual effluent composite sample time interval during a given month;
- $M =$ is the total number of effluent composite sample time intervals during a given months (typically two, 14-day long composite samples);
- $n =$ represents an individual influent composite sample time interval during a given month;
- $N =$ is the total number of influent composite sample time intervals during a given month (typically two, 14-day long composite samples);
- $i =$ represents the three indicator parameters HFPO-DA, PMPA, and PFMOAA.

- $c_{eff,m,i}$ = is the measured concentration of the three indicator parameters for each monthly effluent composite samples⁶;
- c_{inf} _{ni} = is the measured concentration of the three indicator parameters for each monthly influent composite samples⁶;
- w_m = is the effluent concentration volumetric weighting factor calculated for and applied individually to each effluent composite sample concentration;

 V_m = is the volume of water entering (and exiting) the flow-through cell system during the effluent composite sample collection period^{7,8};

- w_n = is the influent concentration volumetric weighting factor calculated for and applied individually to each influent composite sample concentration; and
- V_n = is the volume of water entering (and exiting) the flow-through cell system during the influent composite sample collection period^{7,8};

⁶ Non-detect influent and effluent sample results will be assigned a value of zero for the calculation and the values from duplicate samples will be averaged together.

 7 A time length of 24 hours will be used to calculate influent and effluent volumes for effluent samples collected with composite sample durations less than 24 hours

⁸ While not anticipated, sample durations of less than 24-hours may occur due to events such as the Cape Fear River inundating the flow-through cell.

5. DOCUMENTATION, REPORTING AND MODIFICATION

Interim Effectiveness Demonstration: For each seep System, an effectiveness report will be submitted within four months of startup that summarizes the construction, provides as-built drawings, and evaluates whether the System has consistently intercepted base flow and removes target PFAS indicator compounds at an efficiency of at least 80%, on a monthly average basis for each of the second and third full calendar months of operation.

Modification: If necessary, after six months of operation of the interim seep remediation systems at Seeps A through D, Chemours may submit a proposed modification to the Operation and Maintenance Plan and the Sampling and Effectiveness Plan.

OM&M Reports: Each routine OM&M event (inspection, maintenance, or performance monitoring) will be documented by the OM&M personnel conducting the OM&M event. Customized Inspection Forms and Sampling Logs will be developed to document the routine OM&M events and will be completed during each event. Non-routine inspection or maintenance events will be recorded as well.

Reports will be provided to NCDEQ and Cape Fear River Watch every two months with available analytical results, and operational data (e.g. flow, GAC consumption, PFAS treatment efficiency). The monthly reports will be submitted within 30 days of the end of the reporting month (i.e. the January/February 2021 monthly report will be submitted by 30 March 2021). A detailed reporting schedule is provided in Section 6.

Upset Conditions: In the case of an upset or other condition impeding the operation of the System, Chemours will notify NCDEQ, Cape Fear River Watch, and downstream drinking water utilities in writing within 24 hours of knowledge of such conditions.

6. SCHEDULE

6.1 Design, Permit and Construction Schedule

The anticipated flow-through cell design, permit, and construction schedule is as follows, with CO Addendum milestones noted. Best estimates are presented with the currently available information, and are subject to uncertainty based on permitting review periods (some of which may include public comment periods), extreme weather (i.e., Atlantic hurricane season), and potential work restrictions and supply chain disruptions as a result of the COVID-19 pandemic.

- August 13, 2020: Submittal of 401/404 IP for the Seep C interim remediation system *(completed)*
- August 27, 2020: Submittal of Seep C Land Disturbance permit to NCDEQ
- Mid-September 2020: Submittal of No-Rise Certification to Bladen County and Regional NCDPS Floodplain Management
- Mid- to Late-September 2020: Anticipated approvals from NCDEQ and USACE (note that this is subject to agency review timelines and potentially public comment periods, and difficult to reliably predict). Should permit approvals extend beyond this date, it is anticipated that Seep C construction completion could be delayed.
- Late September 2020: Construction setup at Seep C interim remediation system
- Mid-October 2020: Submittal of Seeps A, B, and D designs as modification to 401/404 IP
- November 16, 2020: Complete construction of Seep C interim remediation system *(CO Addendum Milestone*)
- Mid-December 2020: Submittal of Land Disturbance Permit to NCDEQ for Seeps A, B and D
- Late December 2020: Anticipated approvals from NCDEQ and USACE for Seeps A, B, and D (note that this is subject to agency review timelines and potentially public comment periods, and difficult to reliably predict). Should permit approvals extend beyond this date, it is anticipated that Seep A construction completion could be delayed.
- February 22, 2021: Complete construction of Seep A flow through cell *(CO Addendum Milestone*
- March 15, 2021: Complete construction of Seep B flow through cell *(CO Addendum Milestone*
- April 5, 2021: Complete construction of Seep D flow through cell *(CO Addendum Milestone*

6.2 Reporting Schedule

The anticipated reporting schedule through 2021 is as follows:

- Mid-October 2020: Submittal of final designs for Seeps A, B, and D to NCDEQ and USACE
- February 26, 2021: O&M Report #1
- March 16, 2021: Interim Effectiveness Report for Seep C
- April 30, 2021: O&M Report #2
- June 22, 2021: Interim Effectiveness Report for Seep A
- June 30, 2021: O&M Report #3
- July 15, 2021: Interim Effectiveness Report for Seep B
- August 5, 2021: Interim Effectiveness Report for Seep D
- August 31, 2021: O&M Report #4
- October 5, 2021: Potential submittal of Modification to Operation and Maintenance Plan and Sampling and Effectiveness Plan
- October 29, 2021: O&M Report #5
- December 31, 2021: O&M Report #6

The reporting schedule from 2022 until completion will consist of O&M Reports submitted once every two months.

7. REFERENCES

- AECOM, 2018. Poly and Perfluoroalkyl Substance Quality Assurance Project Plan. August 2018.
- Geosyntec, 2019a. Seeps and Creeks Investigation Report. Chemours Fayetteville Works. 26 August 2019.
- Geosyntec, 2019b. Cape Fear River PFAS Loading Reduction Plan. Chemours Fayetteville Works. 26 August 2019.
- Geosyntec, 2019c. Cape Fear River PFAS Loading Reduction Plan Supplemental Information Report. Chemours Fayetteville Works. 4 November 2019.
- Geosyntec, 2019d. Corrective Action Plan. Chemours Fayetteville Works. 31 December 2019.
- United States Army Corps of Engineers, 2005. Stability Analysis of Concrete Structures. Engineer Manual 1110-2-2100. 1 December 2005.

TABLES

TABLE 1 SAMPLING PLAN Chemours Fayetteville Works, North Carolina

Notes:

1. Autosamplers in Inlet Chamber (influent) and Effluent Stilling Basin (effluent). Composite samples will be analyzed by TestAmerica laboratories for Table 3+ PFAS (see defined list below) and total suspended solids. The samples will also be measured in the field with a calibrated water quality meter for turbidity, dissolved oxygen, pH, conductivity, and temperature.

2. Grab samples will be submitted to the onsite laboratory, with an anticipated detection limit of approximately 100 nanograms per liter for the target indicator compounds. This resolution will be sufficient for purposes of breakthrough monitoring. The lowest concentration value for any indicator compound at any seep is PMPA at Seep D (8,700 ng/L in April 2020). 20% of this lowest value (indicating an 80% removal) would be 1,740 ng/L, thus the resolution of the onsite laboratory is sufficient.

3. As detailed in the Design Drawings, the impoundment elevation will be measured with a transducer in the Inlet Chamber, which will provide flow rate measurements through the flow through cell and the bypass spillway (if elevated 0.5ft above the inlet weir). A transducer in the Effluent Stilling Basin will also measure influent flow rate, as well as head loss through the media. Bypass flow rate in the rectangular weir can also be recorded in the field during inspections.

4. After six months of operation of the interim seep remediation systems at Seeps A through D, Chemours may submit a proposed modification to the Operation and Maintenance Plan and the Sampling and Effectiveness Plan. Such modification could include adjustments to the frequency of sampling listed in this table.

List of 20 Table 3+ Parameters:

FIGURES

ePlane North Carolina FIPS 3200 Feet; Units in Foot US

³

Legend

* - Flow measurement was taken at W.O. Huske Dam - USGS

- Gauge Site No. 02105500 1. Flow at Old Outfall 002, Seep A, Seep B, Seep C, and Seep D locations were measured using flumes.
- 2. Flow at Willis Creek and Georgia Branch Creek were measured using flow velocity method.
- 3. Results of estimated flow at these locations are provided in Table 9 with supplemental flow measurement data included in Appendix E.
- 4. The outline of Cape Fear River is approximate and is based on open data from ArcGIS Online and North Carolina Department of Environmental Quality Online GIS.
- 5. Basemap sources: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community.

2

Raleigh

consultants

August 2020

River ft NAVD88 - feet North American Vertical Datum 1988.

Notes:

- 1. River Stage contours are derived from Lidar scans performed on December 1, 2019 and December 19, 2019 by Spectral Data Consultants, Inc.
- 2. Seep locations identified visually as reported in Geosyntec, 2019. Seeps and Creeks Investigation Report. Chemours Fayetteville Works. 26 August 2019.
- 3. The outline of Cape Fear River is approximate and is based on open data from ArcGIS Online and North Carolina Department of Environmental Quality Online
- GIS (MajorHydro shapefile). 4. Basemap source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community.

Legend

 $\frac{1}{\sqrt{2}}$

Topography Contours (ft NAVD88)

5 Foot Interval

--------- 1 Foot Interval

Observed Seep

Nearby Tributary

Site Boundary

- 5 Foot Interval
- 1 Foot Interval
- **Observed Seep**
- Nearby Tributary
	- Site Boundary

Notes:

ft NAVD88 - feet North American Vertical Datum 1988.

- 1. River Stage contours are derived from Lidar scans performed on December 1, 2019 and December 19, 2019 by Spectral Data Consultants, Inc.
- 2. Seep locations identified visually as reported in Geosyntec, 2019. Seeps and Creeks Investigation Report. Chemours Fayetteville Works. 26 August 2019.
- 3. The outline of Cape Fear River is approximate and is based on open data from ArcGIS Online and North Carolina Department of Environmental Quality Online GIS (MajorHydro shapefile). 4. Basemap source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics,
- CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community.

Legend

Topography Contours (ft NAVD88)

Notes:

ft NAVD88 - feet North American Vertical Datum 1988.

- 1. River Stage contours are derived from Lidar scans performed on December 1, 2019 and December 19, 2019 by Spectral Data Consultants, Inc.
- 2. Seep locations identified visually as reported in Geosyntec, 2019. Seeps and Creeks Investigation Report. Chemours Fayetteville Works. 26 August 2019.
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- GIS (MajorHydro shapefile). 4. Basemap source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community.

Legend

Topography Contours (ft NAVD88)

5 Foot Interval

 $--- - 1$ Foot Interval

 \blacksquare \blacksquare Observed Seep

Nearby Tributary

Site Boundary

Notes:

ft NAVD88 - feet North American Vertical Datum 1988.

- 1. River Stage contours are derived from Lidar scans performed on December 1, 2019 and December 19, 2019 by Spectral Data Consultants, Inc.
- 2. Seep locations identified visually as reported in Geosyntec, 2019. Seeps and Creeks Investigation Report. Chemours Fayetteville Works. 26 August 2019.
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- CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community.

Legend

Topography Contours (ft NAVD88)

5 Foot Interval

 $--- - 1$ Foot Interval

 \blacksquare \blacksquare Observed Seep

Nearby Tributary

Site Boundary

APPENDIX A Seeps A, B, C and D Dry Weather Flow Evaluation

Geosyntec Consultants of NC, P.C. NC License No.: C-3500 and C-295

APPENDIX A

SEEPS A, B, C AND D DRY WEATHER FLOW EVALUATION

INTRODUCTION AND BACKGROUND

There are four onsite groundwater seeps A, B, C and D (Figure 1 of the main text) that emanate on the bluff face from the facility and discharge into the Cape Fear River. As required in the Addendum to Consent Order Paragraph 12, Chemours must install flow through cells at these four seeps and intercept base flow during dry weather. Chemours had previously installed flumes at the terminus of each seep, as close as practical to the confluence of the Cape Fear River (Figure 2 of the main text). For the larger seeps, notably A and B, several additional flumes were also installed at various tributaries that feed the main channel, and at various locations along the main channel itself. This appendix describes how the data collected from these flumes were evaluated to estimate the dry weather flow (i.e., base flow) and the wet weather flow.

The remainder of this appendix is organized as follows:

- **Data Collection** describes how seep flow data were collected;
- **Methodology** describes how seep flow data were organized and assessed;
- **Results** describes the results of the assessment; and
- **Attachments** tables and figures showing data assessed and results.

DATA COLLECTION

Flow rates of water through a flume are estimated by recording the depth of water in the flume and converting this depth into a flow rate using a conversion formula based on the known geometry of the flume. The depths of water in the flumes were measured using a level logger (Solinst 3001 LT F30/M10) which recorded water elevation measurements on either fifteen- or thirty-minute intervals. The data from the loggers were periodically downloaded, adjusted for barometric pressure, and then used to calculate the depth of water in each flume. The depth data were then used to estimate the flow rates through the flumes.

Flumes at each of the seeps were periodically maintained and/or repaired to correct for observed bypass around the flume, which would result in low bias measurements. Maintenance activities included resetting sandbags and water diversion structures to direct waterflow from the seep through the flume. At other times, the flumes were inundated by elevated Cape Fear River water levels, leading to the flumes being unable to measure flows in the seeps.

METHODOLOGY

Dry weather flow rates were estimated using the following steps listed below and described in the following sub-sections:

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- 1. Organize Data;
- 2. Remove Unreliable Data;
- 3. Determine Weather Conditions for Usable Data; and
- 4. Calculate Flow Rate Statistics.

Organize Data

Data for each flume were organized to have the data set contain flow readings on 30-minute intervals. Interval lengths were kept constant across the analysis for each flume to reduce potential bias when calculating statistics¹.

Flow rate data were then paired with the corresponding precipitation data for that date and time. Precipitation data were taken from the onsite meteorological station and supplemented with precipitation data from the United States Geological Survey (USGS) monitoring station at the W.O. Huske Dam if there were no onsite precipitation data available.

Remove Unreliable Data

Unreliable data were removed from the data set from each flume. Unreliable data included data when (a) field records indicated the flume was not operational, (b) the flume was inundated by elevated Cape Fear River water levels, and (c) when the flume data exhibited a low bias. Field records were provided by Parsons of NC (Parsons) to determine when the flume was not operational.

Cape Fear River inundation events were identified by plotting the flow rate for each flume against the Cape Fear River water elevation. These plots are shown in Figures A-1 to A-6. Typically the Cape Fear River and the calculated flume flow rates are not correlated with each other. However, when the river inundates a flume, it causes the level logger in the flume to report an increased depth reading, and consequently higher flows will be calculated; often these flows are much greater than the range capacity of the flume. Inundation events were removed from the data sets.

Low bias data were identified as periods where the flume measurements were lower than typical for other periods and maintenance records indicated the status of the flume was unknown. Field observations have shown that water will flow around the flume if there is damage or erosion to the structures funneling water to the flumes, indicating that overtime flumes are potentially prone to develop a low bias.

The flow data for each flume, both the usable and the unreliable data, along with the amount of rain in the prior 24-hours for each interval are plotted in Figures A-7 to A-13.

¹ Constant interval periods for summary statistics are important since if there were periods with shorter intervals, there would be more intervals for this time period, leading to it being over-represented in the statistical assessment. The converse is true for periods with longer intervals.

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Determine Weather Conditions of Usable Data

With the data organized, and unreliable data removed (i.e. the data conditioned), the weather conditions for each 30-minute interval was determined based on the following criteria:

- Dry any interval for which there was no precipitation during the given interval and during the prior 24-hours;
- \bullet Wet any interval for which there is precipitation during the given interval or during the prior 24-hours;

Calculate Flow Rate Statistics

With weather conditions specified for the usable data sets, flow rate statistics for each weather type were calculated.

RESULTS

A statistical summary of the $95th$, $50th$, and $25th$ percentile flow rates for each weather condition for each flume is provided in Table A-1. The dry weather data have a consistently lower flow rate than the wet weather data. The dry weather data were all within the measurement ranges of the respective flumes. The Seep with the highest estimated base flow was Seep B, with a combined dry weather 95th percentile flow of 226 gallons per minute. The lowest flow was for Seep C, with a dry weather 95th percentile flow of 76 gallons per minute.

ATTACHMENTS

Tables

Table A-1: Seep Flow Rate Statistics Summary

Figures

- Figure A-2: Seep B, Flume B-2: Flow Data vs Cape Fear River Gage Height
- Figure A-3: Seep B, Flume B-TR1: Flow Data vs Cape Fear River Gage Height
- Figure A-4: Seep B, Flume B-TR2: Flow Data vs Cape Fear River Gage Height
- Figure A-5: Seep C: Flow Data vs Cape Fear River Gage Height
- Figure A-6: Seep D: Flow Data vs Cape Fear River Gage Height
- Figure A-7: Seep A1, Flume A-1: Flow Data
- Figure A-8: Seep B, Flume B-2: Flow Data
- Figure A-9: Seep B, Flume B-TR1: Flow Data
- Figure A-10: Seep B, Flume B-TR2: Flow Data
- Figure A-11: Seep B, Combined: Flow Data
- Figure A-12: Seep C: Flow Data
- Figure A-13: Seep D: Flow Data

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TABLES

TABLE A-1

SEEP FLOW RATE STATISITCS SUMMARY Chemours Fayetteville Works, North Carolina

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FIGURES

APPENDIX B 30% Design Drawings

THE CHEMOURS COMPANY

FAYETTEVILLE WORKS PROJECT

SEEP C INTERIM REMEDIATION SYSTEM

FAYETTEVILLE, BLADEN AND CUMBERLAND COUNTIES

STATE OF NORTH CAROLINA

AUGUST 2020

ATRIUM AT BLUE RIDGE
2501 BLUE RIDGE ROAD, SUITE 430 ATRIUM AT BLUE RI
2501 BLUE RIDGE R
RALEIGH, NC 27607

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APPENDIX C-1 Hydraulic Calculations

Summary of Dry Weather Seep Flow Data Chemours, Fayetteville Works, North Carolina

Notes:

1. Results for Seeps A, B, and C based on dry weather flow from 1/5/2019 through 5/17/2020.

2. Results for Seep D based on dry weather flow from 4/25/2020 to 5/17/2020.

Table 2.0 Series Calculated System Head Losses Through the Inlet Chamber and Influent Stilling Basin Chemours, Fayetteville Works, North Carolina

Sheet Title

Table 2.1.C Calculated System Head Losses Through the Inlet Chamber and Influent Stilling Basin SEEP-C-1 Chemours, Fayetteville Works, North Carolina

Table 2.1.C Calculated System Head Losses Through the Inlet Chamber and Influent Stilling Basin SEEP-C-1 Chemours, Fayetteville Works, North Carolina

Table 2.2.C Calculated System Head Losses Through Piping in the Inlet Chamber and Influent Stilling Basin SEEP-C-1 Chemours, Fayetteville Works, North Carolina

Table 2.2.C Calculated System Head Losses Through Piping in the Inlet Chamber and Influent Stilling Basin SEEP-C-1 Chemours, Fayetteville Works, North Carolina

Table 3.0 Series Calculated System Head Losses Through the Lead Filter Basin Chemours, Fayetteville Works, North Carolina

- Sheet Title
3.1.C SEEF 3.1.C SEEP-C-1: Calculated System Head Losses Through the Lead Filter Basin
3.2.C SEEP-C-1: Calculated System Head Losses Through Through Piping in the
- 3.2.C SEEP-C-1: Calculated System Head Losses Through Through Piping in the Filter Beds

Table 4.0 Series Calculated System Head Losses Through the Lag Filter Basin Chemours, Fayetteville Works, North Carolina

Sheet Title 4.1.C SEEP-C-1: Calculated System Head Losses Through the Lag Filter Basin

Table 5.0 Series Calculated System Head Losses Through the Discharge Basin Chemours, Fayetteville Works, North Carolina

Sheet Title

-
- 5.1.C SEEP-C-1: Calculated System Head Losses Through the Discharge Basin
5.2.C SEEP-C-1: Calculated System Head Losses Through Through Piping in th SEEP-C-1: Calculated System Head Losses Through Through Piping in the Discharge Basin

Table 5.1.C Calculated System Head Losses Through the Discharge Basin SEEP-C-1 Chemours, Fayetteville Works, North Carolina

Design Objective

Available head for transfer through discharge

Satisfy design constraints? The Constraints of the Constraints of the Pass Pass Pass Pass Pass

Available head for transfer through discharge (ft) 4.03 4.04 4.05 Height of water in effluent stilling basin minus anticipated head losses through discharge piping network. Available head should be greater than 0 ft.

Isotherm Studies Performed by Others

Notes:

1. @ 97.5 µg/L, the AUR for PFMOAA is likely within the 0.117 to 0.140 range, given that the isotherms for these two estimates were based on concentrations of 85 and 750 µg/L, respectively. The value is likely closer to the 0.117 value given that 97.5 μ g/L is closer to the 85 μ g/L isotherm conditions; assume 0.125 g/L.

2. @ 23 µg/L, the AUR for PMPA is likely within the 0.123 to 0.215 range given that the isotherms for these two estimates were based on concentrations of 40 and 5.4 µg/L, respectively; assume 0.169 g/L (midrange).

3. IS-01 (Perched Zone) corresponds to isotherm pilot study performed by others.

4. IS-04 through IS-07 (Upper OOF2) corresponds to a dual-test isotherm pilot study performed by others.

Isotherm Studies Performed by Others

Notes:

1. @ 180 µg/L, the AUR for PFMOAA is likely in the middle of the 0.14 to 0.165 range, given that the isotherms for these two estimates were based on concentrations of 85 and 750 µg/L, respectively; assume 0.156 g/L.

2. @ 36 µg/L, the AUR for PMPA is likely closer to the 0.132 value than the 0.253 given that the isotherms for these two estimates were based on concentrations of 40 and 5.4 µg/L, respectively; assume 0.14 g/L.

3. IS-01 (Perched Zone) corresponds to isotherm pilot study performed by others.

4. IS-04 through IS-07 (Upper OOF2) corresponds to a dual-test isotherm pilot study performed by others.

Isotherm Studies Performed by Others

Notes:

1. @ 200 µg/L, the AUR for PFMOAA is likely in the middle of the 0.144 to 0.170 range, given that the isotherms for these two estimates were based on concentrations of 85 and 750 µg/L, respectively; assume 0.157 g/L.

2. @ 14 µg/L, the AUR for PMPA is likely in the middle of the 0.114 to 0.180 range, but closer to 0.180 given that the isotherms for these two estimates were based on concentrations of 40 and 5.4 µg/L, respectively; assume 0.163 g/L.

3. IS-01 (Perched Zone) corresponds to isotherm pilot study performed by others.

4. IS-04 through IS-07 (Upper OOF2) corresponds to a dual-test isotherm pilot study performed by others.

Isotherm Studies Performed by Others

Notes:

1. @ 100 µg/L, the AUR for PFMOAA is likely within the 0.118 to 0.141 range, given that the isotherms for these two estimates were based on concentrations of 85 and 750 µg/L, respectively. The value is likely closer to the 0.118 value given that 100 µg/L is close to the 85 µg/L isotherm conditions; assume 0.125 g/L.

2. @ 8.7 µg/L, the AUR for PMPA is likely in the middle of the 0.105 to 0.151 range, but closer to 0.151 given that the isotherms for these two estimates were based on concentrations of 40 and 5.4 µg/L, respectively; assume 0.15 g/L.

3. IS-01 (Perched Zone) corresponds to isotherm pilot study performed by others.

4. IS-04 through IS-07 (Upper OOF2) corresponds to a dual-test isotherm pilot study performed by others.

APPENDIX C-2 Structural Calculations

APPENDIX C STRUCTURAL CALCULATIONS UPLIFT ‐ SEEP C Chemours Fayetteville Works, North Carolina

STEP 1: CALCULATE UPLIFT FORCE water weight (pcf) 62.4

STEP 2: CALCULATE DOWNWARD FORCE

149,684 total concrete (lbs.)

APPENDIX C STRUCTURAL CALCULATIONS UPLIFT ‐ SEEP C Chemours Fayetteville Works, North Carolina

98,504 total wet content when all chambers are full (lbs.)

TOTAL DOWNWARD FORCE

ESTIMATED FACTOR OF SAFETY (DOWNWARD / UPLIFT)¹ 1.35

Note:

1) FSrequired = 1.3 (USACE EM 1110‐2‐2100, 2005)

2) Uplift calculations are performed considering a worst-case flood event with the flow-through cell fully submerged in water.

3) The factor of safety would be under acceptable USACE limits if the flow‐through cells were emptied/drained of dry and wet contents in a submergence event, i.e., changeouts and maintenance events should be performed during dry weather.

BASIN DESIGNATION

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DESIGN CALCULATIONS

The most critical loading case for the design of the reinforced retaining wall is the exterior wall of basin DB adjacent to the riprap armored slope. For this loading case, the full unsupported height of the wall is loaded by the riprap on the exterior and only 1 foot of water on the interior resists the loading. The design calculations below are performed for this loading case and conservatively used for the reinforced concrete design for the remainder of the basin walls.

Load Calculations

For the load calculations the following assumptions are made:

- The riprap on the exterior is assumed to have a flat slope (i.e., slope effects are not considered in the calculation of the lateral earth pressure diagrams)

- The riprap on the exterior of the wall is fully saturated to represent a flood condition

- The wall is assumed to be in an at-rest condition (i.e., minimal deflection)
- The wall acts as a cantilever (i.e., base is fixed and top is free)

- The critical load combination is 1.2D + 1.6L, where D represents the dead load and L represents the live load. The riprap on the exterior of the wall is a dead load and the water saturating the riprap on the exterior and in the basin is a live load

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Horizontal pressure diagrams and resulting shear force and bending moment diagrams are shown below

3

The ultimate factored shear force and bending moment occur at the base of the wall and are calculated as below

Initially assume 8-inch thick concrete wall with #4 reinforcement with 12-inch center-to-center spacing on both faces in both vertical and horizontal directions

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The area of flexural steel required (0.388 sq. in.) is greater than the area of steel provided by #4 reinforcement spaced at 12 inches (0.196 sq. in.). Therefore, change vertical reinfrocement to #6 reinforcement with 12-inch center-to-center spacing.

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Area of Flexural Steel Required
\nto Resist Bending Moment
\nto Resist Bending Moment
\n
$$
A_{s,reqd} := \frac{M_u \cdot 12}{\phi_b \cdot f_y \cdot \left(d_{wall} - \frac{a}{2}\right)} = 0.411 \frac{in.^2}{ft}
$$
\nThe area of flexural steel required (0.411 sq. in.) is less than the area of steel provided by
\n#6 reinforcement spaced at 12 inches (0.442 sq. in.)
\nShear Design
\nReduction Factor for Bending
\n
$$
\phi_v := 0.75
$$
\n
$$
\phi_v := 0.75
$$
\n
$$
\phi_v := 1
$$
\n(ACI 318-14 21.2.1)
\nChapter Concrete Factor
\n
$$
\lambda := 1
$$
\n(ACI 318-14 22.5.5.1)
\n
$$
V_c := 2 \cdot \lambda \cdot \sqrt{f_c} \cdot (b \cdot 12) \cdot d_{wall} = 8538.1
$$
\n
$$
U_c := 2 \cdot \lambda \cdot \sqrt{f_c} \cdot (b \cdot 12) \cdot d_{wall} = 8538.1
$$
\n(ACI 318-14 22.5.5.1)

Because $\phi_{v} \cdot V_{c}$ is greater than V_{u} , no transverse reinforcement is required for shear

Reinforcement Detailing

 $(for$

Note: The reinforcement ratios required for shrinkage and temperature reinforcement (0.0018) are less than the reinforcement ratios above. Shrinkage and temperature reinforcement are satisfied.

Development Length

Modification Factor for Casting Position *Ψt*≔ 1 (ACI 318-14 25.4.2.4)

Straight Development Length for #6 Reinforcement with Spacing Greater Than 2d_b and
Cover Greater Than d_b (ACI 318-14 25.4.2.2) Cover Greater Than d_b

for #6 Reinforcement
\nfor #4 Reinforcement
\nfor #4 Reinforcement
\n
$$
l_{d.6} := \left(\frac{f_y \cdot \Psi_t \cdot \Psi_e}{25 \cdot \lambda \cdot \sqrt{f_c}}\right) \cdot 0.75 = 42.7 \quad in.
$$
\n
$$
l_{d.4} := \left(\frac{f_y \cdot \Psi_t \cdot \Psi_e}{25 \cdot \lambda \cdot \sqrt{f_c}}\right) \cdot 0.5 = 28.5 \quad in.
$$

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Reduction Factor for Bending $\phi_b := 0.9$ (ACI 318-14 21.2.1)

 $\#6$ 6 \cdot 0.75 = 4.5 *in.*

 $#6$ $12 \cdot 0.75 = 9$ *in.*

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 $\text{Inside Bend Diameter}$ #4 $6 \cdot 0.5 = 3$ *in.*

Straight Extension $#4$ $12 \cdot 0.5 = 6$ *in.*

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PRELIMINARY DETAILS

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ABER

 α

et Pin

ISB Flow

Baffle

 $\overline{1}$

B

0" Transfer Bar
Manifold Pinin

INFLUENT STILLING
BASIN (ISB)

 $\overline{\mathbf{u}}$

ESB

DB

DESIGN INPUTS

Assume the foundation soils are sands with clays or stiff clays

CRITICAL SECTIONS

Variations in materials and water levels within adjacent basins causes shear forces and bending moments on the slab. Critical sections were identified based on largest differences between materials and water levels in adjacent basins. Three critical sections were evaluated to identify the ultimate factored shear forces and bending moments.

The critical load combination is assumed to be 1.2D + 1.6L where D represents the dead load and L represents the live load. The concrete, gravel, and carbon are considered as dead loads while the water is considered as a live load.

Section A-A'

For Section A-A', the critical loading represents conditions during the change out of FB-2 where the spent carbon is removed. The maximum water level in FB-1 is considered.

$\widetilde{\mathcal{L}}$ อ เ RUCTURAL CALCULATIONS **REINFORCED CONCRETE SLAB CALCULATIONS Chemours Fayetteville Works, North Carolina**

Distributed Loads

Section B-B'

For Section B-B', the critical loading represents conditions through the Inlet Chamber, ISB, ESB, and DB. The maximum water levels in the Inlet Chamber and ISB and the minimum water level in the DB are considered. The partial concrete wall separating the Inlet Chamber and ISB is not considered as the loads are transfered to the perimeter walls of the basin.

Section C-C'

 $16' - 0''$ **Inlet Chamber** ← $-4'-0'' \longrightarrow$ $FB-1$ Water $10' - 0''$ $3'-6''$ ۻٓ Saturated ŕ. Gravel $4' - 0''$ Saturated Gravel $1' - 0'$

For Section C-C', the critical loading represents conditions during the change out of FB-1 where the spent carbon is removed. The maximum water level in the Inlet Chamber is considered.

Reinforced Concrete Walls and Slab (8"-thick typical)

Distributed Loads

The ultimate factored shear force and bending moment occur along Section C-C' within the slab below FB-1.

Slab Design

Initially assume #4 reinforcement with 12-inch center-to-center spacing on both faces in both directions

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Note: The reinforcement ratios required for shrinkage and temperature reinforcement (0.0018) equal the reinforcement ratios above. Shrinkage and temperature reinforcement are satisfied.

 $A_{s,min,v} < A_{s,ns}$ and $A_{s,min,v} < A_{s,ew}$

Development Length

Straight Development Length for #6 Reinforcement with Spacing Greater Than 2d_b and Cover Greater Than d_b (ACI 318-14 25.4.2.2)

REINFORCED CONCRETE SLAB CALCULATIONS Chemours Fayetteville Works, North Carolina

for #4 Reinforcement
\n
$$
l_{d,4} := \left(\frac{f_y \cdot \Psi_t \cdot \Psi_e}{25 \cdot \lambda \cdot \sqrt{f_c}}\right) \cdot 0.5 = 28.5 \quad in.
$$
\n
$$
Splice Length
$$

Tension Lap Splice Length for Class A Splice (ACI 318-14 25.5.2.1)

for #4 Reinforcement $l_{st,4} := l_{d,4} = 28.5$ *in.* greater than 12 in.

Spacing of Reinforcement

Maximum Spacing of Longitudinal Reinforcement (ACI 318-14 8.7.2.2)

$$
s_{max} := \min\left(2 \cdot t_{slab} \cdot 12, 18\right) = 16 \quad in.
$$

Spacing of 12 inches for both directions of reinforcement is less than 16 inches

Hook Details for 90-Degree Hooks (ACI 318-14 25.3.1)

PRELIMINARY DETAILS

Plan View (NOT TO SCALE)

#4 @ 12" BOTH **FACES EACH** DIRECTION (TYP)
Section View (NOT TO SCALE)

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