

#### Submissions to the State of North Carolina and Cape Fear River Watch

The following table identifies submissions made by Chemours pursuant to the Consent Order and Addendum (COA) for the period of January 1, 2024 through the end of the first quarter on March 31, 2024.

Section	Title	Submitted Date
11	October – December 2023 P11 Data Submittal	3/14/2024
12 - COA 1b	PFAS Mass Loading Assessment Report Q4 2023	03/28/2024
12 - COA 2c	CFR Long-Term Remedy Performance Monitoring Report 4 Oct-Dec 2023	03/28/2024
12 - COA 2c	Roadbed Excess Admixture Barrier Wall Soil LEAF Study Report	03/15/2024
12 - COA 3b	2023 Annual Wetland Monitoring Report Year 1	01/31/2024
12 - COA 3b	PFAS Outfall 004 NPDES Permit River Transect Monitoring Report 2023	01/30/2024
12 - COA 3a	Temporary Perched Zone Groundwater Report October through December 2023	02/12/2024
16	Annual Onsite and Offsite Groundwater Monitoring Report Q4 2023	03/28/2024
21	Consent Order Paragraph 21 Extension Request & Approval	01/05/2024
28	4Q2023 Quarterly Progress Report	01/29/2024

¹ Consent Order submissions by Chemours from lodging of the Proposed Consent Order in November 2018 through March 31, 2019 were presented in the 2019 ¹st quarter report, April 1, 2019 through June 30, 2019 in the 2019 ²nd quarter report, July 1, 2019 through September 30, 2019 in the 2019 ³nd quarter report, October 1, 2019 through December 31, 2019 in the 2019 ⁴th quarter report, January 1, 2020 through March 31, 2020 in the 2020 ¹st quarter report, April 1, 2020 through June 30, 2020 in the 2020 ²nd quarter report, July 1, 2020 through September 30, 2020, in the 2020 ³nd quarter report, October 1, 2020 through December 31, 2020 in the 2021 ⁴th quarter report, January 1, 2021 through March 31, 2021 in the 2021 ¹st quarter report, April 1, 2021 through June 30, 2021 in the 2021 ²nd quarter report, July 1, 2021 through September 30, 2021 in the 2021 ³nd quarter report, July 1, 2021 through June 30, 2022 in the 2022 ²nd quarter report, July 1, 2022 through March 31, 2022 in the 2022 ²nd quarter report, July 1, 2022 through September 30, 2022 in the 2022 ³nd quarter report, October 1, 2022 through December 31, 2022 in the 2022 ²nd quarter report, July 1, 2023 through March 31, 2023 in the 2023 ¹st quarter report, April 1, 2023 through March 31, 2023 in the 2023 ²nd quarter report, July 1, 2023 through September 30, 2023 in the 2023 ²nd quarter report, July 1, 2023 through September 30, 2023 in the 2023 ²nd quarter report, July 1, 2023 through September 30, 2023 in the 2023 ²nd quarter report, July 1, 2023 through September 30, 2023 in the 2023 ²nd quarter report, July 1, 2023 through September 31 in the 2023 ⁴nd quarter report.



2024 First Quarter Residential Sampling Summary

Item	Cumberland County (East of River)	Cumberland County (West of River)	Bladen County (East of River)	Bladen County (West of River)	Robeson County	Sampson County	Hoke County	Total
Total Number of Residences Sampled	53	31	11	1	6	42	0	144
Residences Exceeding GAC Criteria (GenX >= 10 ng/L)	2	3	0	0	0	0	0	5
Residences Exceeding RO Criteria (∑PFAS >= 70 ng/L)	2	3	0	0	1	0	0	6
Residences Exceeding RO Criteria (PFAS >= 10 ng/L)	19	5	0	0	2	4	0	30
Residences Drinking Water Well Detections (Results < 10 ng/L)	15	10	1	1	2	12	0	41
Residences Drinking Water Well Non- Detections	15	10	10	0	1	26	0	62



## **Replacement Drinking Water Actions**

(Replacement drinking water actions from November 2018<sup>2</sup> - March 31, 2024)

### Fayetteville Counties Area

Summary	Number of Residences on Bottled Water	Residences Connected to Public Water by Chemours	Residences with GAC Systems Online	Residences with RO Installed	Outreach Letters Interactions	Outreach Call Team Interactions
Total	2,445	291	769	3,246	210,893	89,646
GAC	Residences Eligible for GAC	Residences Declined GAC	Residences with GAC Systems Online	Number of GAC Systems Decommissioned		
1Q 2024	12	0	95	0		
Total	2,074	1	771	10		
RO	Residences Eligible for RO (including shared well residences)	Residences Declined RO	Residences with RO Installed		•	
1Q 2024	39	2	41			
Total	5,696	105	3,227			

Note: Number of residences on bottled water is all residences currently on bottled water services; eligible residences for GAC and RO includes any location eligible and installed.

<sup>&</sup>lt;sup>2</sup> The date the proposed Consent Order was lodged.



#### **Consent Order Progress Details**

This section summarizes the activities that have been undertaken by Chemours pursuant to the Consent Order Compliance Measures and Addendum for the period from January 1, 2024 through the end of the first quarter on March 31, 2024.

#### Section 7 Control Technology Improvements

The thermal oxidizer (see photo) continues to control process emissions at an average PFAS destruction efficiency exceeding 99.99%.

# Section 10 No Discharge of Process Wastewater from Chemours' Manufacturing Areas

Chemours does not discharge its process wastewater and instead collects and ships its process wastewater offsite for disposal or recycles treated water internally within several manufacturing processes.



# Section 11 Characterization of PFAS in Process and Non-Process Wastewater and Stormwater at the Facility

During the first quarter of 2024, two bi-monthly sampling events were conducted. The first bi-monthly sampling event was conducted on January 9 and 10 (January 2024 event). The second bi-monthly sampling event was conducted on March 6 and 7 (March 2024 event). Samples were collected from 28 locations during both the January 2024 and March 2024 events. Data collected from October—December 2023 were submitted on March 14, 2024.

The PPA Stormwater and Soil Sampling Work Plan was also conducted in the first quarter of 2024. The sampling event occurred on February 12 and 13, 2024. Fifteen (15) stormwater samples were collected on February 12, 2024, and 13 soil samples were collected for leachate analysis on February 13, 2024. Analytical results from the work plan are currently being evaluated.

# Section 12 Accelerated Reduction of PFAS Contamination in the Cape Fear River and Downstream Water Intakes, and Addendum to Consent Order Paragraph 12

Chemours continued operation of the treatment system for the Old Outfall (Outfall 003) pursuant to Consent Order Paragraph 12(e) and a NPDES permit issued by NCDEQ. Chemours's Addendum implementation activities during the first quarter of 2024 included:

#### Consent Order Addendum Paragraph 1

On March 28, 2024, Chemours submitted to NCDEQ and Cape Fear River Watch the Cape Fear River PFAS Mass Loading Assessment – Fourth Quarter 2023 Report pursuant to Consent Order Addendum Paragraph 1(b). The report describes sampling activities and mass loading results for the Cape Fear River and PFAS loading pathways from the fourth quarter of 2023. This submission was also made as part of the quarterly reporting of mass loading sampling outlined in the Corrective Action Plan (Paragraph 16). In January 2024, Chemours conducted quarterly mass loading sampling required by Consent Order Addendum Paragraph 1.



#### Consent Order Addendum Paragraph 2

During the first quarter of 2024, Chemours operated and maintained the four flow-through cells, i.e., the interim remediation systems, at Seeps A-D. On March 28, 2024, Chemours submitted the CFR Long-Term Remedy Performance Monitoring Report #4, which includes, in addition to the long-term remedy components, description of the operations and maintenance activities at the flow-through cells over the quarterly reporting period of October-December 2023.

#### Consent Order Addendum Paragraph 3

Performance details for the COA paragraph 3a perched zone groundwater pumping system from the fourth quarter of 2023 were reported on February 12, 2024 ("Temporary Perched Zone Groundwater Pumping – October 2023 through December 2023 Results"). The first quarter 2024 report will be submitted by June 30, 2024.

Details relating to COA paragraph 3b. are being reported as described above for paragraph 2. On March 28, 2024, Chemours submitted the CFR Long-Term Remedy Performance Monitoring Report #4, which includes performance details relating to the long-term remedy components over the quarterly reporting period of October-December 2023. The report for first quarter of 2024 will be submitted by June 30, 2024.

On January 31, 2024, Chemours submitted the 2023 Annual Wetland Monitoring Report Year 1 pursuant to COA Paragraph 3b. The report includes wetland and stream monitoring data collected during the first annual post-impact monitoring assessments conducted in May and September 2023. Additional stream surveying will be conducted in Q2 2024.

On January 30, 2024, Chemours submitted the Cape Fear River PFAS Outfall 004 NPDES Permit River Transect Monitoring – 2023 Report pursuant to COA Paragraph 3b. The report provides monthly monitoring results for the river transects along the Cape Fear River collected between January and December 2023. This submission was made as part of the annual reporting of PFAS concentrations outlined in Permit NC0090042. In March 2024, Chemours conducted quarterly 004 NPDES river transect sampling. The data will be submitted in as DMRs in April 2024 and will be reported in the 2024 annual report.

#### Consent Order Addendum Paragraph 4

Consistent with the Stormwater Sampling Plan, Chemours conducted three sampling events in January 2024, two sampling events in February 2024, and four sampling events in March 2024. The stormwater treatment system removed greater than 99% of PFAS and consistently captured stormwater runoff from precipitation events up to the 1-inch, 24-hour design during the first quarter of 2024. A quarterly bypass sample was collected on March 6, 2024 when rainfall exceeded 1" in 24 hours.

#### Section 14 Toxicity Studies

Provided updated, detailed schedule outlining the expected reporting dates for all the ceriodaphnia (acute and chronic) and fish acute studies. Provided the dates for the sediment range finder studies. There will be a joint technical meeting including Eurofins, Chemours, and DEQ to review the range finder results once they are



available for all five substances. The final sediment range finder in life phase will be completed at the end of May.

The first 28-day rodent study will begin in early June. Dose levels for the remaining studies will be set in conjunction with DEQ and Charles River Laboratories following the delivery of proposed doses from Chemours to DEQ and after DEQ has sufficient time to review the proposed dose levels. The protocols for the 90-day studies will be reviewed following the initiation of the 28-day studies.

#### Section 16 Groundwater Remediation

On March 28, 2024, Chemours submitted to NCDEQ and Cape Fear River Watch the Cape Fear River PFAS Mass Loading Assessment – Fourth Quarter 2023 Report pursuant to Consent Order Addendum Paragraph 1(b). This submission was also made as part of quarterly reporting of mass loading sampling outlined in the Corrective Action Plan (Paragraph 16). Ongoing groundwater remediation activities are being conducted pursuant to Consent Order Addendum Paragraph 3 and are described earlier in this document under that paragraph. On March 28, 2024 Chemours submitted the Annual Onsite and Offsite Groundwater Monitoring Report which reported on onsite and offsite groundwater data collected in July and August 2023. This report also included an evaluation of the onsite monitoring well network, based on four years of annual monitoring, to develop an optimized groundwater sampling program that provides comparable understanding of groundwater in source areas beneath the Site and the extent of PFAS in groundwater. The next annual groundwater monitoring event will be conducted in Q3 2024.

# Sections 19 and 20 Provision of Public Water Supplies, Whole Building Filtration Systems, and Reverse Osmosis Drinking Water Systems

As shown in the summary tables above, Chemours continues to make significant progress in implementing the Consent Order requirements of Paragraphs 19 and 20. RO acceptance rates and installations have maintained a steady pace. O&M activities for installed GAC systems continue uninterrupted. Bottled water services continue uninterrupted for 2,445 homes. Chemours is working on installation of water meters, where available, so that eligible residences can be connected to a public water system.

Based on property owners' preferences for permanent replacement drinking water, Chemours continues the installation of mitigation systems or connections to public water systems to those eligible residences and properties.

#### Section 21 Private Well Testing

As of March 31, 2024, approximately 20,487 residences have been identified within the current study area, of which 13,076 have been sampled and 3,569 additional residences have received at least one initial sample offer letter. Results of sampling that occurred throughout the first quarter of 2024 (144 residences) are presented at the beginning of this progress report. Current Step-out and Infill distance intervals range from 2.5 miles to 27.5 miles from the Site. Chemours continues to collect samples from private drinking water wells, confirm residences/tenants/owners' names, phone numbers, and addresses, and determine public water connections.

#### Section 22 Provision of Sampling Results

Chemours provided (and continues to provide) sampling results to NCDEQ and residents as required under the Consent Order. Chemours has provided sampling results to NCDEQ by sending a courtesy email notification and by uploading sampling results to the state EQUIS database. Chemours has also provided final lab reports to



NCDEQ. Chemours has provided sampling results to residents by including preliminary results with water filtration system initial offer letters and sending the final lab reports to residents within the following 30 days. Chemours has also provided non-detect sampling results to residents.

#### Section 23 Interim Replacement of Private Drinking Water Supplies

All residences eligible to receive the interim replacement drinking water supplies have received the supplies (i.e., bottled water or voucher card for bottled water). As of March 31, 2024, there are 2,445 residences receiving bottled water services.

#### Section 24 Drinking Water Compliance Plan

As discussed above, the off-site replacement drinking water program continues. The Drinking Water Compliance Plan (DWCP) is currently under review and some of the protocols are being revised based on discussions with NCDEQ.

Chemours met with DEQ on February 21, 2024, to discuss the status of delineation program and the overall drinking water mitigation. The meeting also discussed potential revisions to current DWCP that are currently under further discussion.

Chemours has identified potential additional residences for public water connections. Chemours is working with counties and water providers to facilitate and make public water connections where feasibility has been determined.

#### Section 28 Reporting

Chemours submitted the Consent Order 4<sup>th</sup> quarter 2023 progress report on January 29, 2024.

#### Sections 29 and 30 Public Information

Chemours has continued to post its Consent Order submissions at <a href="https://www.chemours.com/en/about-chemours/global-reach/fayetteville-works/compliance-testing">https://www.chemours.com/en/about-chemours/global-reach/fayetteville-works/compliance-testing</a>.



### **Four Counties Sampling Program**

In accordance with the "Framework to Assess Table 3+ PFAS in New Hanover, Brunswick, Columbus, and Pender Counties" (Assessment Framework), Chemours continues to assess Table 3+ compounds. Access/encroachment agreements with private property owners and the NC Department of Transportation and NCDEQ well permits have been obtained. Installation of 15 temporary monitoring wells and 15 permanent monitoring wells and collection of associated soil samples, was conducted between January 3, 2024 and March 1, 2024. Monitoring wells were developed and groundwater samples were collected from 34 of 37 wells between January 17, 2024 and March 31, 2024. Groundwater sampling of the remaining three wells is planned to be conducted early in the second quarter of 2024. Chemours continued to conduct residential sampling during the first quarter.

#### Interim Sampling and Drinking Water Plan for Four Counties

Based on the revised Interim Plan dated June 1, 2022, representative sampling activities continued in the first quarter which included eligible private wells identified through community outreach via letters across the four counties, proximity to Consent Order exceedances, and requests received via the call line or web form. A sixth quarterly follow-up mailing via certified mail was sent to unresponsive owners/residents across the four counties in February 2024. Three monthly reports (for December 2023, January 2024, and February 2024) were submitted to NCDEQ during the first quarter which documented the progress of this private well program. As of January 12, 2024, well information and sampling offer letters were mailed to 14,100 additional properties that were identified in the expanded sampling eligibility criteria established in November 2023.

As of March 31, 2024, there are 32,627 addresses that have been screened for sampling eligibility, and 10,789 met the eligibility criteria. Of these 10,789 eligible locations, 8,218 have been scheduled for sampling and 7,269 have been sampled. Of the 7,149 samples with analytical results, 5,569 showed no exceedances of Consent Order Attachment C criteria and 1,580 samples had exceedances of the Consent Order criteria. Including these 1,580 sampled private wells and the 254 shared well users, there were 1,834 properties that were above the CO criteria. Chemours and its contractors have started the installation of mitigation systems or connection to public water systems to those properties that are eligible based on the sampling results. As of March 31, 2024, bottled water was being provided to 882 residents/owners that qualified, 782 RO systems had been installed, 125 GAC systems had been installed, 5 combinations of both RO and GAC systems had been installed, and 71 public water connections had been completed. These counts of bottled water recipients, system installations, and public water connections include qualifying shared well users. No further action was required for properties that were vacant, empty lots, connected to public water, or declined bottled water, including four of the NCDEQ resampling locations.



### Cumulative Residential Sampling Summary as of First Quarter 2024

Item	New Hanover County	Brunswick County	Pender County	Columbus County	Total
Total Number of Residences Sampled	3,551	874	2,599	245	7,269
Total Number of Residences with Sample Results	3,530	846	2,564	209	7,149
Residences Exceeding GAC Criteria (GenX >= 10 ng/L)	130	69	8	0	207
Residences Exceeding RO Criteria (∑PFAS >= 70 ng/L or PFAS >= 10 ng/L)	706	167	493	7	1,373
Residences with Drinking Water Well Detections (Results <10 ng/L)	919	127	260	4	1,310
Residences with no Drinking Water Well Detections (All Attachment C PFAS Non- Detect)	1,775	483	1,803	198	4,259

#### **Notes:**

Values in this table do not include shared well users.

### Four Counties Interim Replacement Drinking Water Actions

Replacement drinking water actions from February 15, 2022, the start date of the Chemours Call Line in the Four Counties Area, through March 31, 2024.

Metric	Total	New Hanover	Brunswick	Pender	Columbus
Total Number of Private Wells Above the CO Criteria Including Shared Well Users	1,834	996	240	591	7
Number of Sampled Private Wells Above the CO Criteria	1,580	836	236	501	7
Number of Shared Private Well Users Above the CO Criteria	254	160	4	90	0
Number of Locations Currently Being Provided Interim Replacement Drinking Water <sup>1</sup>	882	443	116	318	5

#### **Notes:**

<sup>1 –</sup> Number of Locations Provided Interim Replacement Drinking Water includes shared wells. The remaining eligible properties have had an RO or GAC system installed or have been connected to public water.



## Four Counties Area Permanent Replacement Drinking Water

		Totals By County				
Metric	Total	New Hanover	Brunswick	Pender	Columbus	
RO						
Total Number of Properties Sent an Offer Letter	1,510	823	169	511	7	
Total Number of Responses to RO Offers	1,140	604	129	405	2	
Total Number of Properties with RO Systems Installed	782	474	83	223	2	
Total Number of Properties Connected to Public Water	67	5	7	55	0	
GAC						
Total Number of Properties Sent an Offer Letter	247	168	70	9	0	
Total Number of Responses to GAC Offers	219	149	61	9	0	
Total Number of Properties with GAC System Installed	125	84	39	2	0	
Total Number of Properties with RO and GAC Systems Installed	5	4	0	1	0	
Total Number of Properties Connected to Public Water	4	0	3	1	0	