

**Public Comments Received by DEQ for the SAB GenX Report During the Extended Comment Period (8/20/2018 through 10/13/2018)**

There were a total of 21 comment submissions by 11 submitters (9 private citizens, 1 consultant, 1 NGO)

<i>Comment Category</i>		<i>Comment</i>		
<i>No.</i>	<i>Comment Category</i>	<i>Comment Date</i>	<i>Identifier</i>	<i>Comment Text or Summary</i>
1	<b>Why write the report?</b>	<b>8/30/2018</b>	<b>1.a.</b>	"Is it really necessary to write a 27-page report to say, that the solution is to shut Chemours down. Then, write a 27 page report on how to BEGIN to repair the damage done and have Chemours fund it. Time is what we don't have. Why are you wasting it?...This is affecting...children and babies unborn including yours. Even if your [sic] lucky to not live in an affected area, you don't know where your children will travel or reside, or where the wind will blow. Please do the right thing. You know what it is. Follow your heart. Love our earth and humanity."

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		9/6/2018	2.a.	"The only acceptable water and air standard for GenX is zero."
		9/7/2018	2.b.	Comment agrees with James [sic] DeWitt, Department of Pharmacology and Toxicology, ECU: "The weight of evidence support the lower value rather than the higher - 0.1 over 1.0 - based on the number of corroborating studies." Please delete the 140 ppt and put the standard at 0.1.
		9/27/2018	2.c.	Chemours should supply water until problems resolved, enforced by DEQ.
		9/28/2018	2.d.	Addressed SAB to be more specific as to what GenX health goal is to be used for; says DEQ and Chemours misused 140 ppt health goal. SAB should advise EMC and DEQ "that any regulation of PFAS must apply to the entire class of compounds." Reminded SAB of its duties.
		10/1/2018	2.e.	Compel Chemours to supply water to all affected homes in the area. (3 commentors in 1 email)
2	GenX regulatory standards	9/27/2018	2.f.	"The GenX health goal of 140 ppt cannot be used as the protective standard for those living around, and downstream of, Chemours' facility. First, the SAB must be more explicit about what the GenX health goal should and should not be used for. The report states that the 140 ppt level 'is not a boundary line between a "safe" and "dangerous" level of [GenX],' and that it is instead 'the concentration of GenX in drinking water at which no adverse non-cancer health effects would be anticipated over an entire lifetime of exposure.' According to the SAB's report, therefore, the 140 ppt health goal is insufficient to protect people who have ben exposed to levels of GenX much higher than 140 ppt throughout their lifetime."
		9/27/2018	2.g.	"Yet DEQ and Chemours have both misued the 140 ppt health goal. In DEQ's June 11, 2018 proposed order in <i>N.C. Dept. of Environmental Quality v. Chemours</i> in Bladen County Superior Court, DEQ suggests that Chemours should establish permanent water supplies only for households with wells contaminated 'in exceedance of a health goal established by DHHS.' In Chemours' plans for cleaning up its on-site contamination, the company states that its goal 'is to ensure concentrations in the Cape Fear River do not exceed 140 ppt of [GenX] downstream of the river water intake.' But the communities that have been exposed to GenX and other PFAS in thousands of parts per trillion for decades cannot be protected by a health goal that (1) only consideres exposure to one out of dozens, if not hundres, of PFAS, and (2) does not account for prior exposure to expremely high levels of GenX. The SAB should explicitly warn DEQ against using and DEQ must not use - the GenX 140 ppt health goal as the level to protect communities that have already been exposed to Chemours' highly toxic pollution for decades. Rather, a health goal that accounts for prior long-term exposure to high levels of multiple PFAS must apply to those communities."

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		9/8/2018	3.a.	Requests that DEQ use the PQL in the Court Order and use it to determine who receives bottled water until a solution is provided.
		9/9/2018	3.b.	Repeat of 9/8/2018 by different person comments to a different DEQ staff
		9/9/2018	3.c.	Repeat of 9/8/2018 by different person comments to a different DEQ staff
		9/18/2018	3.d.	"Use the Practical Quantitation Limit for any PFAS as determining requirement for who is provided municipal water as soon as possible, but also bottled water until it is ran."
		9/22/2018	3.e.	"Please use the PQL Practical Quantitative (sic) Llimit. There is no possible proof the 140ppt number is safe."
		9/27/2018	3.f.	"PQL should be 0.1 ppt"
3	Use PQL as regulatory standard and value for alternative water supplies	9/28/2018	3.g.	2 emails sent; one original that was copied/pasted into 3.i. and 3.j. and 2nd was original re-sent to many personnel @ DEQ and newscasters, as well as members of the neighborhood
		10/3/2018	3.h.	"It is our constitutional right to have pure water, not to mention God given..."
		10/1/2018	3.i.	asking DEQ to enforce PQL for all PFAS (3 commentors in 1 email)
		10/1/2018	3.j.	"Please enforce the laws of our state 15A NCAC 21.0202 and the Hardison Amendment § 150B-19.3 (a)(5) Court Order subsection." (3 commentors in 1 email) Final paragraph reads: "I have attended every session DEQ and others held. I have read quite a lot about impacts worldwide on not just GENX but many PFAS contaminates. I believe I kept an open mind and I can see no number is acceptable. Ad the current groundwater laws 15A NCAC 2L .0202 already provide a far better number being the PQL limit. DEQ must use that for any PFAS detected, not doing so is negligent and places all of us in jeopardy. Please put human health and safety first, be scientifically and morally on the safe saide, and do not take a chance with human lives. We need you to use the legal mechanisms already in place and use 15A NCAC 2L .0202(c) to protect our families."
		10/12/2018	3.k.	
		10/12/2018	3.l.	Several members of the community forwarded/agreed with original email sent the same day (comment 3.k.)
		10/12/2018	3.m.	Another citizen concurred with comment 3.k.

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4	<b>Additive PFAS exposure &amp;/or effects</b>	9/8/2018	4.a.	"140 ng/L for GenX is irrelevant for most when you have multiple chemicals in the well, so standard at should be taken into account of the additive nature of the chemicals and for groundwater it should be less than 1 Part per trillion."
		9/21/2018	4.b.	No one has addressed the other chemicals we have been exposed to nor the reaction of said chemicals with Gen X.
		9/27/2018	4.c.	"PFAS must be regulated as a class. The SAB should advise the Environmental Management Commission and DEQ that any regulation of PFAS must apply to the entire class of compounds. The SAB has taken nearly a full year to assess the health goal for GenX, which is only one compound within a family of over 3,000 PFAS on the global market. A regulatory process which addresses one PFAS at a time will not effectively protect the health of the public and the environment. The duties of the SAB include: 'advising] the [Environmental Management Commission, 'recommend[ing] the necessity and/or urgency for controlling the releases' of PFAS, and 'act[ing] as consultants regarding the DEQ's determinations to regulate releases of contaminants.' The SAB should be explicit about the protective limits of the GenX health goal for impacted communities, and advise the Environmental Management Commission and DEQ on how to feasibly regulate the thousands of existing PFAS."

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5	<b>GAC filtration insufficient &amp; Hot water heater source concerns</b>	9/18/2018	5.a.	Not sufficient in and of itself to deal with PFAS present in water; "something is eating up the metal in my plumbing systems. It is doing same in many in our area." Follow NC Administrative Code in reference to groundwater; use the PQL for any PFAS as determining requirement for who is provided municipal water, and also bottled water. Include remediation in fixing water lines and appliances.
		9/22/2018	5.b.	"...hot water heaters... please use some common sense to realize these chemicals are in our pipes and hot water heaters. It does not take a scientist to realize the build-up over years. With these chemicals destroying our water, they have surely destroyed our pipes and humans."
		9/27/2018	5.c	GAC systems unreliable, letting too many chemicals through.
6	<b>Other non-drinking water exposure routes</b>	9/21/2018	6.a	Everyone knows that contaminants can be absorbed through a cut in the skin, ingestion (vegetables, fruits, berries), and openings within the body through bathing and washing in contaminants.
		9/27/2018	6.b	Higher contamination levels under trees after rainfall; now that floodwaters have receded, contamination moved to groundwater.
		9/27/2018	6.c	"Communities around and downstream of Chemours' Fayetteville Works Facility (1) have had GenX in their drinking water for four decades at levels far higher than 140 ppt, (2) have had dozens of other perfluoroalkyl and polyfluoroalkyl substances (PFAS) in their drinking water at high levels, and (3) have been exposed to PFAS through their air, soil, fish, vegetables, and even honey. When DEQ began investigating the facility in June 2016 GenX levels at Chemours' outfall into the Cape Fear River reached levels of up to 39,000 ppt, and GenX levels in the finished drinking water from the Cape Fear Public Utility Authority's Sweeney Water Treatment Plant reached levels of up to 1,100 ppt. Since then, DEQ has found GenX in private drinking water wells at levels as high as 4,000 ppt - 28 times the state's health goal of 140 ppt. GenX and other PFAS have been released in high concentrations from the Fayetteville Works Facility into the Cape Fear River since 1980. Not only have communities been exposed to GenX at extremely high levels, they have lived with dozens of other PFAS in their air, water, and soil. From September to December of 2017, DEQ found at least 33 different PFAS in private drinking water wells, some at concentrations of 299 ppt and 209 ppt. As the SAB's report states, PFAS has also been found in fish and sediment around the facility, and in garden crops in similarly PFAS-contaminated sites."
7	<b>Miscellaneous</b>	10/12/2018	7.a.	"We have relocated to the Calabash area from up north in January. Due to the situation with GenX, it is a decision I fully regret."