



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

March 19, 2020

Sheila Holman
Assistant Secretary for the Environment
1601 Mail Service Center
Raleigh, NC 27699-1601
sheila.holman@ncdenr.gov

Re: Consent Order Implementation - Coronavirus Impacts

Dear Ms. Holman,

As you are well aware, the global coronavirus pandemic is presenting unprecedented challenges for our community, state, country, and the world at large. Chemours is committed to conducting its operations in accordance with federal and state guidelines to protect public health and safety and help slow the spread of the virus, while at the same time doing its best to meet the existing deadlines under the Consent Order as well as complying with other regulatory requirements. If Chemours or its contractors were to become unable to meet any existing Consent Order deadlines because of the response to the pandemic and the circumstances it has brought about, that would qualify as a force majeure event as defined in Consent Order paragraph 32.

As discussed during the March 18 teleconference between Chemours and DEQ, the pandemic is already having a number of impacts on the work of Chemours and its contractors in implementing the Consent Order, and the extent of potential delays are uncertain at this time. By way of example:

- Because of coronavirus concerns in the local community, Chemours will be sending letters to residents seeking their approval before entering their property for sampling, and for the time being Chemours's contractors will no longer knock on doors unannounced to conduct sampling. Chemours anticipates that this will cause delays with conducting sampling and may impact Chemours's ability to meet the 18-month sampling completion deadline in Consent Order paragraph 21.
- Chemours's contractor Pioneer, which provides sampling results pursuant to Consent Order paragraph 22, is located in Washington State and currently has several employees out sick. The spread of the coronavirus in Washington State and potential further government-imposed restrictions there may impact the ability to meet the 7-day provision of sampling results deadlines under Consent Order paragraph 22.

- The current closures at the University of South Carolina due to the coronavirus may delay Dr. Susan Richardson's work on the total organic fluorine study under Consent Order paragraph 26.

Chemours will continue to monitor the coronavirus situation closely and keep DEQ informed of potential impacts and delays and how we plan to address them. Chemours appreciates DEQ's understanding and flexibility in these circumstances and DEQ's indication on the March 18 teleconference that it will work with Chemours to extend Consent Order deadlines if needed because of the rapidly changing circumstances.

Sincerely,

A handwritten signature in black ink that reads "Brian D. Long". The signature is written in a cursive style with a large initial "B".

Brian D. Long
Plant Manager
Chemours – Fayetteville Works

Cc:

William F. Lane, DEQ
Francisco Benzoni, NC DOJ
Michael Abraczinskas, DAQ
Michael Scott, DWM
Danny Smith, DWR
David C. Shelton, Chemours
John F. Savarese, WLRK
Kemp Burdette, CFRW
Geoff Gisler, SELC