

From: [Culpepper, Linda](#)
To: [Martin, Allen D](#)
Cc: [Johnson, Chris](#); [Peterson, Kyle R](#)
Subject: FW: [External] RE: Paragraph 11a review -- RE: Responses to Comments on Paragraphs 11.a and 11.b Submissions
Date: Saturday, June 1, 2019 3:58:43 PM
Attachments: [image001.png](#)
[Eurofins EPA537Mod SOP.pdf](#)
[TestAmerica EPA537Mod SOP.pdf](#)

Allen – realized I had not forwarded info. received Thurs. on Method SOPS.

Linda

Linda Culpepper
Director, NC DEQ Division of Water Resources

Email: linda.culpepper@ncdenr.gov
Phone: 919-707-9014

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From: Garon, Kevin P <Kevin.Garon@chemours.com>
Sent: Thursday, May 30, 2019 3:46 PM
To: Culpepper, Linda <linda.culpepper@ncdenr.gov>; Long, Brian D <Brian.D.Long@chemours.com>
Cc: Holman, Sheila <sheila.holman@ncdenr.gov>; Lane, Bill F <Bill.Lane@ncdenr.gov>; Benzoni, Francisco <fbenzoni@ncdoj.gov>; Abraczinskas, Michael <michael.abraczinskas@ncdenr.gov>; Scott, Michael <michael.scott@ncdenr.gov>; Shelton, Dave <DAVID.C.SHELTON@chemours.com>; JFSavarese@WLRK.com; kemp@cfrw.us; ggisler@selcnc.org; Compton, Christel E <CHRISTEL.E.COMPTON@chemours.com>; Gross, Joel M. <Joel.Gross@arnoldporter.com>; Tom Santoro <Thomas.Santoro@arnoldporter.com>; Allison Rumsey <Allison.Rumsey@arnoldporter.com>; Grzyb, Julie <julie.grzyb@ncdenr.gov>
Subject: [External] RE: Paragraph 11a review -- RE: Responses to Comments on Paragraphs 11.a and 11.b Submissions

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Dear Ms. Culpepper,

Please find attached the revised SOPs for Method 537 v1.1 Mod from Eurofins and TestAmerica. We are providing these SOPs on behalf of the laboratories. These attachments should satisfy the remaining request noted in the second bullet in the May 24th response to you.

Respectfully submitted,
Kevin

From: Garon, Kevin P

Sent: Friday, May 24, 2019 2:01 PM

To: 'Culpepper, Linda' <linda.culpepper@ncdenr.gov>; Long, Brian D <Brian.D.Long@chemours.com>

Cc: Holman, Sheila <sheila.holman@ncdenr.gov>; Lane, Bill F <Bill.Lane@ncdenr.gov>; Benzoni, Francisco <fbenzoni@ncdoj.gov>; Abraczinskas, Michael <michael.abraczinskas@ncdenr.gov>; Scott, Michael <michael.scott@ncdenr.gov>; Shelton, Dave <DAVID.C.SHELTON@chemours.com>; JFSavarese@WLRK.com; kemp@cfwr.us; ggisler@selcnc.org; Compton, Christel E <CHRISTEL.E.COMPTON@chemours.com>; Gross, Joel M. <Joel.Gross@arnoldporter.com>; Tom Santoro <Thomas.Santoro@arnoldporter.com>; Allison Rumsey <Allison.Rumsey@arnoldporter.com>; Grzyb, Julie <julie.grzyb@ncdenr.gov>

Subject: Paragraph 11a review -- RE: Responses to Comments on Paragraphs 11.a and 11.b Submissions

Dear Ms. Culpepper,

Thank you for your comments on the Chemours Response to Comments on Paragraphs 11.a and 11.b.. Below are Chemours' responses in [blue text](#) to your comments. Please feel free to call Brian Long, Plant Manager at (910) 678-1415, or me at 704-560-6435 if you have questions.

- Experiments on stabilities tests are indicated as being planned – what is the anticipated timing for the results?
[Chemours is planning to begin stability testing on Table 3+ standards within the next 2-3 months. To assess stability, one set of duplicate standards will be stored at room temperature and a second set of duplicate standards will be stored under refrigeration \(approximately 4 to 6°C\). Standards will be analyzed once a month for up to one year. The results of the experiment will be available 1-2 months after the last analysis with interim updates provided based on data availability.](#)
- There's an indication in T3-3 that revised SOPs from both Test America and Eurofins laboratories will be provided in the near future – what is the anticipated timing?
[The revised SOPs for Table 3+ were provided to NCDEQ via email on May 6th by Brian Long along with the revised workplan for Paragraph 11\(b\) Characterization Plan and the table of Responses to Comments. The revised SOPs for Method 537 v1.1 Mod will be provided in the next couple weeks following final revisions and review.](#)
- Regarding synthesized compounds, DEQ requests them to be submitted to NCDEQ and EPA R4/ORD as they are developed, rather than upon request.
[Chemours will provide synthesized compounds to NCDEQ and EPA R4/ORD as they are developed. Please provide us a contact and shipping location as to where you would like these materials sent.](#)
- In addition DEQ requests Q-TOF-MS data files and chromatograms to be submitted to NCDEQ with all results, rather than upon request.
[Chemours will provide Q-TOF-MS data files and chromatograms to NCDEQ as they are available.](#)

Respectfully submitted,
Kevin

From: Culpepper, Linda [<mailto:linda.culpepper@ncdenr.gov>]

Sent: Monday, May 13, 2019 12:05 AM

To: Long, Brian D <Brian.D.Long@chemours.com>

Cc: Holman, Sheila <sheila.holman@ncdenr.gov>; Lane, Bill F <Bill.Lane@ncdenr.gov>; Benzoni, Francisco <fbenzoni@ncdoj.gov>; Abraczinskas, Michael <michael.abraczinskas@ncdenr.gov>; Scott, Michael <michael.scott@ncdenr.gov>; Shelton, Dave <DAVID.C.SHELTON@chemours.com>; JFSavarese@WLRK.com; kemp@cfw.us; ggisler@selcnc.org; Compton, Christel E <CHRISTEL.E.COMPTON@chemours.com>; Gross, Joel M. <Joel.Gross@arnoldporter.com>; Tom Santoro <Thomas.Santoro@arnoldporter.com>; Allison Rumsey <Allison.Rumsey@arnoldporter.com>; Garon, Kevin P <Kevin.Garon@chemours.com>; Grzyb, Julie <julie.grzyb@ncdenr.gov>

Subject: ⚠ Paragraph 11a review -- RE: [External] Responses to Comments on Paragraphs 11.a and 11.b Submissions

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Brian – thank you for the response to the comments to Paragraph 11a components. Many areas have been addressed by incorporating the suggested changes.

We do have a few follow up questions on the submittal:

- Experiments on stabilities tests are indicated as being planned – what is the anticipated timing for the results?
- There’s an indication in T3-3 that revised SOPs from both Test America and Eurofins laboratories will be provided in the near future – what is the anticipated timing?

I have asked EPA R4 and ORD to follow up on whether use of spiked field samples should be required, and will forward information on that topic and any other remaining items from EPA upon receipt.

Regarding synthesized compounds, DEQ requests them to be submitted to NCDEQ and EPA R4/ORD as they are developed, rather than upon request.

In addition DEQ requests Q-TOF-MS data files and chromatograms to be submitted to NCDEQ with all results, rather than upon request.

Linda

Linda Culpepper
Director, NC DEQ Division of Water Resources

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From: Long, Brian D <Brian.D.Long@chemours.com>
Sent: Monday, May 6, 2019 1:42 PM
To: Culpepper, Linda <linda.culpepper@ncdenr.gov>
Cc: Holman, Sheila <sheila.holman@ncdenr.gov>; Lane, Bill F <Bill.Lane@ncdenr.gov>; Benzoni, Francisco <fbenzoni@ncdoj.gov>; Abraczinskas, Michael <michael.abraczinskas@ncdenr.gov>; Scott, Michael <michael.scott@ncdenr.gov>; Shelton, Dave <DAVID.C.SHELTON@chemours.com>; JFSavarese@WLRK.com; kemp@cfwr.us; ggisler@selcnc.org; Compton, Christel E <CHRISTEL.E.COMPTON@chemours.com>; Gross, Joel M. <Joel.Gross@arnoldporter.com>; Tom Santoro <Thomas.Santoro@arnoldporter.com>; Allison Rumsey <Allison.Rumsey@arnoldporter.com>; Garon, Kevin P <Kevin.Garon@chemours.com>
Subject: [External] Responses to Comments on Paragraphs 11.a and 11.b Submissions

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Dear Ms. Culpepper,

Please see the attached responses to comments on Paragraphs 11 (a) and 11(b) submissions.

Sincerely,



Brian D. Long
Plant Manager – Fayetteville Works, Chemours™ Fluoroproducts

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Fayetteville, NC 28306



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