



NORTH CAROLINA  
Environmental Quality

ROY COOPER  
Governor

MICHAEL S. REGAN  
Secretary

LINDA CULPEPPER  
Director

June 19, 2019

Mr. Brian D. Long, Plant Manager  
Chemours – Fayetteville Works  
22828 NC Highway 87 W  
Fayetteville, NC 28306

Dear Mr. Long,

The Division has reviewed Chemours responses to Comments on Paragraph 11.b submitted on May 6, 2019. The revisions addressed our concerns and the Division finds the plan acceptable provided the following recommendations are implemented.

1. When Chemours refines the appropriate testing methodology for DFSA, MTP, MMF, and PPF Acid, if detections of these parameters continue to appear in Outfall 002, the sampling plan should be adjusted to collect several samples throughout the plant site in order to assess and locate possible sources. In fact, with the discovery of new compounds in the wastewaters the plan should evolve to include testing throughout the site in order to determine and eliminate sources.
2. NPDES permitting is concerned that Chemours show progress towards eliminating all PFAS compounds being discharged from non-contact cooling water, boiler blowdown, and stormwater on the site. With that end result as a goal, Chemours should continually adjust or increase sampling locations until each significant source of PFAS compounds is identified and corrective actions are taken to eliminate the source. The PFAS compounds referred to in this case are those added to the intake waters after use or passage through the plant site. Such a plan to assess and eliminate contamination from non-process wastewater discharges will also be needed in a renewed NPDES Permit.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Culpepper".

Linda Culpepper, Director  
Division of Water Resources, NCDEQ

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



North Carolina Department of Environmental Quality | Division of Water Resources  
512 North Salisbury Street | 1617 Mail Service Center | Raleigh, North Carolina 27699-1617  
919.707.9000