



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

July 23, 2019

Linda Culpepper
Director, Division of Water Resources
1611 Mail Service Center
Raleigh, NC 27699-1611
linda.culpepper@ncdenr.gov

Re: Consent Order Paragraph 11.b Sampling Plan -
Response to DEQ Approval Letter with Recommendations

Dear Ms. Culpepper,

Thank you for providing DEQ's approval of Chemours's wastewater and stormwater sampling plan (the "Plan") submitted pursuant to Consent Order paragraph 11.b. Your approval letter dated June 19, 2019, and sent by email on June 24, 2019, stated that the "the plan [is] acceptable provided the following recommendations are implemented." Among other recommendations, your letter stated that "the plan should evolve to include testing throughout the site in order to determine and eliminate sources," and "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."

Chemours agrees with DEQ's recommendation that the Plan be viewed dynamically, with adjustments being made, when appropriate, as more is learned from ongoing sampling, evaluation and remediation. But the Consent Order does not contemplate the complete elimination of every source of PFAS compounds at the site. Instead, as you know, paragraph 12.a of the Consent Order, for example, requires Chemours to submit "a plan demonstrating the maximum reductions in PFAS loading from the Facility...that are economically and technologically feasible, and can be achieved within a two-year period." We will continue to work closely with DEQ to report on our ongoing sampling and to modify the sampling plan as appropriate. And we will submit source reduction plans in accordance with the requirements established by the terms of the Consent Order.

If you have any questions or would like to discuss this matter further with us, we would be glad to arrange a time to speak.

Sincerely,

A handwritten signature in black ink that reads "Brian D. Long". The signature is written in a cursive style with a large, looped 'B' and a long, sweeping tail.

Brian D. Long
Plant Manager, Chemours – Fayetteville Works

Cc:

Sheila Holman, DEQ

William F. Lane, DEQ

Francisco Benzoni, NC DOJ

Michael Abraczinskas, DAQ

Michael Scott, DWM

David C. Shelton, Chemours

John F. Savarese, WLRK

Kemp Burdette, CFRW

Geoff Gisler, SELC