

# SOUTHERN ENVIRONMENTAL LAW CENTER

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April 29, 2019

Sheila Holman  
Assistant Secretary for the Environment  
N.C. Department of Environmental Quality  
1601 Mail Service Center  
Raleigh, N.C. 27699-1601  
sheila.holman@ncdenr.gov

Re: Chemours' Proposed Work Plan for Toxicity Studies Pursuant to Consent Order Paragraph 14.

Dear Asst. Secretary Holman:

We have reviewed Chemours' proposed work plan for the toxicity studies pursuant to paragraph 14 of the consent order and provide the following comments on behalf of Cape Fear River Watch.

- Chemours has estimated that it will take approximately 1 year to produce 10-15 kg of each compound, but has not provided a basis for that conclusion. *See* Work Plan at 5 (Dose Selection). Chemours must support that assumption.
- Chemours has proposed using dose levels of 0.1 mg/kg/day and 1 mg/kg/day. Work Plan at 5 (Dose Selection). The higher dose does reflect the higher levels of contamination that residents of southeastern North Carolina have been exposed to over the last several decades. Additional testing with higher doses that reflect likely historical exposure rates should be conducted.
- Under the work plan, no further action would be taken if effects are not observed at a 1 mg/kg/day dose. Work Plan at 5 (Dose Selection). Given the historical levels of exposure and the reality that people are rarely exposed to a single PFAS at a time, demonstrating no observable effect at 1 mg/kg/day is not sufficient.
- Chemours estimates that the first tests will begin in July 2020. Work Plan at 6 (Work Plan and Schedule). It is our understanding that Nafion Byproduct 2 is available commercially and, therefore, delay is unnecessary.

Thank you for your consideration of these comments.

Sincerely,



Geoffrey R. Gisler

Sheila Holman

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GRG/rgd

Cc (via email):

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Bill Lane, DEQ

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