



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

January 28, 2019

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

Re: Request for Approval of Notification Letters Regarding Alternative Drinking Water

Dear Ms. Holman,

Paragraphs 19, 20, 22, and 23 of the Proposed Consent Order call for actions by Chemours regarding the provision of temporary and alternative drinking water that require notification to certain residents. Although the Consent Order has not been entered by the Court, and DEQ is still reviewing public comments, we are seeking your approval of these draft notification letters at this time so that we are prepared to meet the Consent Order's deadlines. These letters, which will not be sent until the Consent Order is entered, are based upon the proposed Consent Order language and will be revised as necessary once the Consent Order is final. However, we do not expect that those revisions will materially change these obligations.

- Pursuant to Paragraph 19, Chemours must provide whole building filtration systems or under sink reverse osmosis units on every kitchen and bathroom sink to “any party (i.e., household, business, school, or public building) with a private drinking water well that has been found through testing validated by DEQ to be contaminated by concentrations of GenX compounds in exceedance of 140 ng/L, or any applicable health advisory, whichever is lower” unless provision of public water connections to such party is not cost prohibitive. We refer to these parties as “Paragraph 19 Parties.”
- Pursuant to Paragraph 20, if well sampling results indicate combined quantifiable concentrations of PFAS in exceedance of 70 ng/L or quantifiable concentrations of any individual PFAS in exceedance of 10 ng/L, the household will qualify for up to three under the sink reverse osmosis units. We refer to these parties as “Paragraph 20 Parties”
- Pursuant to Paragraph 22 of the Consent Order, Chemours must provide sampling results to parties whose wells were tested prior to the lodging of the Consent Order and who have not yet received those results.
- Pursuant to Paragraph 23, Chemours must offer temporary replacement water supplies within three days of becoming aware that a household qualifies for replacement of private drinking water pursuant to paragraph 19 or 20. For those who would be entitled to temporary water supplies based on tests done prior to

entry of the Consent Order, DEQ has agreed that the supplies should be provided as soon as practicable, but not more than 30 days after entry of the Order.

- We will send you separately a letter seeking your concurrence in our analysis as to which Paragraph 19 Parties would be eligible for public water connection (“Eligible Paragraph 19 Parties”), and which of those parties would not be eligible because the costs would be prohibitive (“Non-Eligible Paragraph 19 Parties”).

Attached for DEQ’s approval, please find four letters notifying different groups of parties of Chemours’s obligations under Paragraphs 19, 20, 22, and 23 (the A and B designations indicate who is represented by counsel):

- Letters 1A and 1B notify Paragraph 20 Parties, who had previously been apprised of their test results, that they qualify for up to three reverse osmosis units, and temporary water supplies pending the installation of those units. These letters will be hand-delivered with an initial delivery of bottled water shortly after entry of the Consent Order.
- Letters 2A and 2B notify Paragraph 20 Parties, who had not previously been apprised of their test results, of their Table 3 sampling results and that they qualify for up to three reverse osmosis units, and temporary water supplies pending the installation of those units. These letters will be hand-delivered with an initial delivery of bottled water shortly after entry of the Consent Order.
- Letters 3A and 3B Non- Eligible Paragraph 19 parties, all of whom were offered GAC treatment systems prior to entry of the Consent Order, that they continue to be eligible for a GAC system and that they could also choose to have RO units installed on each of their kitchen and bathroom sinks. Letters 3A and 3B also notify these homeowners of the continued availability of temporary water supplies and of the new Table 3 sampling results for wells tested prior to the lodging of the Consent Order. These letters will be mailed shortly after entry of the Consent Order, assuming DEQ has approved the eligibility determinations for public water connections.
- Letter 3C notifies Eligible Paragraph 19 Parties whose residence already has a water main installed next to their home that they are entitled to public water, as it is not cost-prohibitive, and that Chemours will pay monthly water fees up to \$75/month. Letter 3C also notifies these Parties that if they prefer, they are eligible for a GAC system or RO unit installed on each of their kitchen and bathroom sinks. These letters will be mailed within shortly after entry of the Consent Order.
- Letter 4 notifies homeowners of new Table 3 sampling results for wells tested prior to the lodging of the Consent Order that do not indicate the presence of any



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

PFAS. These homeowners are not eligible for drinking water treatment systems or replacement water under the terms of the Consent Order. These letters will be sent within a week after entry of the Consent Order.

As noted above, Chemours will be sending by separate letter to you its analysis of the feasibility of connection to public water. Residences entitled to such connections, i.e. Eligible Paragraph 19 Parties, will be sent a letter outlining their options. We will share the proposed text of that letter with the feasibility analysis, because the cost levels will depend on how many Eligible Paragraph 19 Parties choose the option of public water connections.

We would appreciate your approval of these letters as soon as possible as Chemours is working to meet its obligations under the Consent Order.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Brian D. Long'.

Brian D. Long
Plant Manager
Chemours – Fayetteville Works