



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

May 6, 2019

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

Re: Request for Approval Pursuant to Consent Order Paragraph 26

Dear Ms. Holman,

Paragraph 26 of the Consent Order states: “Chemours shall fund development by a third party contractor(s) of a sampling and analytical methodology for the measurement of Total Organic Fluorine in its process air emissions and process wastewater. Chemours’ contractor(s) shall (i) be approved by DEQ, (ii) submit quarterly reports to DEQ, and (iii) submit the completed methodology to DEQ for review by December 31, 2020.”

Chemours is hereby seeking DEQ’s approval of the third party Chemours proposes to retain for developing the Total Organic Fluorine (TOF) methodology under Paragraph 26. Chemours proposes to retain Dr. Susan D. Richardson, the Arthur Sease Williams Professor of Chemistry in the Department of Chemistry and Biochemistry at the University of South Carolina. Dr. Richardson’s CV, as well as her detailed proposal for developing the TOF methodology, are enclosed. Further information about Dr. Richardson and links to her publications are available online, at https://sc.edu/study/colleges_schools/artsandsciences/our-people/faculty-staff/richardson_susan.php.

Dr. Richardson is well known and well regarded in the field of analytical environmental chemistry. Her laboratory at the University of South Carolina has approximately ten graduate students to support her research efforts, as well as all of the sophisticated instrumentation that will be needed to perform the requisite scientific analyses. Prior to joining the University of South Carolina, Dr. Richardson worked for nearly 25 years as a Research Chemist at U.S. EPA’s National Exposure Research Laboratory in Athens, Georgia.

Also enclosed is an accompanying sampling plan prepared by Chemours’ consultant, Geosyntec Consultants of NC, P.C. (“Geosyntec”). The sampling plan sets forth how samples for the development of the TOF methodology will be collected during air and process wastewater sampling events at Fayetteville Works performed pursuant to other Consent Order provisions, and how those samples will be provided to Dr. Richardson for her analyses.

To protect the intellectual property and proprietary interests of Dr. Richardson and the University of South Carolina, Chemours will not be further distributing this submission or posting it on Chemours’ website. Chemours respectfully requests that DEQ and Cape Fear River

Watch, and their respective counsel, likewise maintain the confidentiality of this submission. After work is underway, Chemours will post the quarterly reports on its website.

Please confirm that Dr. Richardson's proposal and the accompanying sampling plan prepared by Geosyntec are acceptable to DEQ, so that this work may timely proceed. We would also appreciate receiving your confirmation that you will maintain this submission as confidential. If you have any questions or need further information, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Brian D. Long". The signature is written in a cursive style with a large initial "B".

Brian D. Long
Plant Manager
Chemours – Fayetteville Works

Enclosures

CV of Dr. Susan D. Richardson

Dr. Susan D. Richardson, Proposal for Development of a Total Organic Fluorine Method for the Analysis of Process Wastewater Streams and Air from Fayetteville Works (NC)

Geosyntec Consultants of NC, P.C., Consent Order Paragraph 26 Total Organic Fluorine Method Development Sample Collection Plan

Cc:

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