



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

March 22, 2019

Michael Abraczinskas
Director, Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641
michael.abraczinskas@ncdenr.gov

Re: Monthly Emissions Report Pursuant to Consent Order Paragraph 8

Dear Mr. Abraczinskas,

Pursuant to Paragraph 8.d of the Consent Order, please find enclosed the monthly emissions report for GenX Compounds from Fayetteville Works. The report was prepared with support from our consultant, ERM NC, Inc. (“ERM”). Please note that the spreadsheet file underlying the report contains confidential business information of Chemours. Accordingly, I will send that spreadsheet file under separate cover directly to you, and the spreadsheet file will not be further distributed or posted on Chemours’ website.¹

The enclosed report accounts for the preliminary results received just this week of stack testing conducted between February 26 and March 1 while the Vinyl Ethers North (“VEN”) facility was running a PPVE campaign. Pursuant to the Consent Order, we will submit the final report for this stack testing by April 15, and we will account for the final results in our next monthly emissions report due by April 21.

The preliminary VEN PPVE stack testing results show an average efficiency in controlling emissions of GenX Compounds of over 97% for the VEN carbon adsorber unit, with seven of the eight runs at over 99% efficiency. However, the preliminary results also show that the emissions measured at the stack in this round of testing were higher than those measured at the carbon unit outlet, indicating the presence of additional GenX Compounds emissions sources entering the stack after the carbon unit.

We have quickly identified three possible sources for these additional GenX Compounds emissions to the stack (the permeator vent, analyzer room, and possible leaks between the VEN building and HFPO building) and have taken immediate action to address them. Specifically, we re-routed the permeator vent from the stack to the waste gas scrubber, so that emissions from the permeator will now be controlled by both scrubbers and by the carbon unit. Second, we turned off the DAF GC analyzer, and, third, we have sealed up small penetrations between the VEN and HFPO buildings. As we have already notified DAQ, we will be conducting stack testing again

¹ Please also note that we are making this submission today out of an abundance of caution and in the interest of transparency, as we interpret the Consent Order not to require the first monthly emissions report until next month, on April 21. We understand that you may have a different view, but we do appreciate your agreement yesterday that we could have one extra day for this submission.

this upcoming Monday and Tuesday, March 25 and 26, to verify the efficacy of these actions, and we will provide those results to you when available.

The enclosed monthly emissions report shows the estimated GenX Compounds emissions through February and the projected emissions for the rest of the year, and identifies the assumptions that underlie the estimates. These assumptions include that the stack testing we are doing next week will demonstrate the efficacy of our immediate actions to reduce further the VEN stack emissions, and that additional actions planned for reduction of emissions in the Vinyl Ethers South (“VES”) facility for interim control of both process and indoor air emissions there, before the thermal oxidizer is installed by the end of this year, will be completed by the end of this June. Based on these assumptions, ERM’s calculations show that the facility will meet the Consent Order’s 82% and 92% requirements for plant-wide interim reductions of emissions of GenX Compounds. Should these assumptions change, we will take other actions as necessary to maintain compliance.

If you have any questions or would like to discuss further, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Long".

Brian D. Long
Plant Manager
Chemours – Fayetteville Works

Enclosure

Cc:

Sheila Holman, DEQ

William F. Lane, DEQ

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Michael Scott, DWM

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