



May 6, 2019

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

Re: Responses to Comments on Paragraphs 11.a and 11.b Submissions

Dear Ms. Culpepper,

On December 30, 2018 and January 30, 2019, Chemours made submissions to you pursuant to paragraphs 11.b and 11.a of the Consent Order, respectively. Between late March and late April 2019, Chemours received multiple sets of comments on these submissions from DEQ, Cape Fear River Watch, and U.S. EPA and participated in multiple calls with the commenters to discuss their various comments. Chemours has worked with its consultant Geosyntec Consultants of NC P.C. (Geosyntec), as well as with the Eurofins and TestAmerica third-party laboratories, to address expeditiously and comprehensively all of the comments it received.

Accordingly, in response to all comments received, please find enclosed here: 1) a detailed Responses to Comments document prepared by Geosyntec; 2) an Updated PFAS Characterization Sampling Plan prepared by Geosyntec; and 3) updated laboratory SOPs from Eurofins and TestAmerica for Table 3 PFAS compounds.

Please let me know if you have any questions. We would very much appreciate receiving your approval of these documents as soon as possible so that we may timely proceed with our important work under the Consent Order.

Sincerely,

Brian D. Long Plant Manager

Chemours – Fayetteville Works

Brion O Lay

Enclosures

Geosyntec, Responses to Comments
Geosyntec, Updated PFAS Characterization Sampling Plan
Eurofins, Table 3 Compounds SOP
TestAmerica, Table 3 Compounds SOP

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