



April 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, we 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.

The enclosed monthly emissions report shows the estimated GenX Compounds emissions through March and the projected emissions for the rest of the year, and identifies the assumptions that underlie the estimates. Further, the report accounts for the results of recent stack testing, conducted between February 26 and March 1 and between March 25 and 26 while the Vinyl Ethers North ("VEN") facility was running a PPVE campaign. We submitted the final reports for the February 26 - March 1 stack testing last Monday, April 15, and the final report for the March 25 - 26 stack testing, from Weston Solutions, Inc. ("Weston"), is enclosed.

As we noted in our submission of the monthly emissions report last month, the February 26 - March 1 stack testing indicated the presence of additional GenX Compounds emissions sources entering the stack after the carbon unit, and we quickly identified three possible sources (the permeator vent, analyzer room, and possible leaks between the VEN building and HFPO building) and took 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 are now controlled by both scrubbers and by the carbon unit. Second, we turned off the DAF GC analyzer, and, third, we sealed up small penetrations between the VEN and HFPO buildings. The results of the March 25-26 stack testing verify the efficacy of these actions, as they show minimal difference between the emissions exiting the carbon unit and the emissions exiting the stack.

Based on these recent stack testing results and the identified assumptions, ERM's calculations continue to 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,

Brian D. Long Plant Manager

Chemours – Fayetteville Works

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## **Enclosures**

April 2019 Monthly Emissions Report

Fluoromonomers Manufacturing Process Vinyl Ethers North Carbon Bed Removal Efficiency and Division Stack Test Report, Test Dates: 25 and 26 March 2019

## Cc:

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