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

January 30, 2019

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

Re: Submission Pursuant to Proposed Consent Order Paragraph 11.a

Dear Ms. Culpepper,

Paragraph 11.a of the proposed Consent Order states:

> By January 31, 2019, Chemours shall (a) provide DWR with all known analytical test methods and lab standards for all PFAS in all process and non-process wastewater and stormwater at the Facility, including but not limited to all process and non-process wastewater and stormwater discharged through Outfall 002, and (b) submit a plan and schedule for conducting non-targeted analysis of all process and non-process wastewater and stormwater streams to identify any additional PFAS and developing test methods and lab standards for such compounds. Chemours shall commence implementation of such plan within thirty (30) days of approval by DEQ.

Although the proposed Consent Order has not yet been entered by the Court, Chemours is continuing to proceed on the schedule set forth in the proposed Consent Order with respect to these requirements. We are also providing notice as set forth in the proposed Consent Order.

With respect to the requirements set forth in paragraph 11.a(a) of the proposed Consent Order, Chemours is hereby providing DWR with the enclosed documents entitled "Polyfluorinated Alkyl Substances (PFAS) in Aqueous Samples by Method 537 Version 1.1 Modified Using LC/MS/MS" ("Modified Method 537") and "Determination of Table 3 Plus Compounds by LC/MS/MS" ("Table 3 Plus Method").

The enclosed Modified Method 537 was prepared by the Eurofins third-party laboratory, and it describes the analytical test method currently used for certain PFAS compounds (as specified therein) based on US EPA's September 2009 Method 537. The

lab standards for each of the Modified Method 537 compounds are commercially available and may be purchased online.

The enclosed Table 3 Plus Method, in turn, was prepared by Chemours, and it describes the analytical test method currently used for certain additional PFAS compounds (as specified therein). The Table 3 Plus Method is currently in draft form, as Chemours continues to refine and optimize this method. Chemours has shared this method and the associated lab standards for each compound with its external testing laboratories. The lab standards are in the form of a 0.1% (by weight) solution in water for each compound, and Chemours can ship these standards solutions to DEQ promptly upon request.

The enclosed Modified Method 537 and Table 3 Plus Method comprise the two current analytical test methods for currently known PFAS compounds in process and non-process wastewater and stormwater at Fayetteville Works. As you are aware, sampling at the facility has detected the presence of some, but not all, of the PFAS compounds covered by these two methods.

With respect to the requirements set forth in paragraph 11.a(b) of the proposed Consent Order, Chemours is hereby submitting to DWR for its approval the enclosed "PFAS Non-Targeted Analysis and Methods Development Plan" for process and non-process wastewater and stormwater streams at Fayetteville Works.

Please let me know if you have any questions. Pursuant to the proposed Consent Order, we will await further action with respect to the non-targeted analysis plan until we receive DWR's approval.

Sincerely,

Brian D. Long
Plant Manager
Chemours – Fayetteville Works

Enclosures

Polyfluorinated Alkyl Substances (PFAS) in Aqueous Samples by Method 537 Version 1.1 Modified Using LC/MS/MS

Determination of Table 3 Plus Compounds by LC/MS/MS

PFAS Non-Targeted Analysis and Methods Development Plan

Cc:

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William F. Lane, DEQ
Francisco Benzoni, NC DOJ
Michael Abraczinskas, DAQ
Michael Scott, DWM
David C. Shelton, Chemours
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