



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

July 15, 2021

Mr. Gary Saunders
NCDEQ, Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

Re: Emissions Calculation Methodology for HFPO-DA
Chemours Company
Facility ID 0900009
Permit No. 03735T48

Dear Mr. Saunders –

In response to the NC Division of Air Quality's (DAQ) June 29, 2021 letter and our June 24, 2021 technical meeting regarding the Site-wide emissions calculation methodology for HFPO-DA, Chemours is submitting the updated emissions calculations. Chemours understands that, even though the previous calculation using an averaging method was approved by DAQ (March 15, 2021 letter covering calendar year 2020), the revised test-to-test method is more frequently used as an industry standard and with DAQ.

Per the June 29, 2021 letter, the submitted calculations reflect the revised calculation methodology change retroactive to January 2020 for calendar year 2020 and for purposes of the 12-month rolling calculation that started in December 2020.

In our discussion June 24, 2021, we also discussed alternatives for the Enhanced LDAR calculation methodology for fugitive emissions, which emissions are included in the 12-month rolling calculation. DAQ suggested that we describe an alternate enhanced LDAR method and submit to DAQ for approval. Chemours is actively working on this and will submit an alternate method under a separate cover.

After DAQ reviews the submitted calculations, Chemours requests a meeting with DAQ, including Director Abraczinskas and Deputy Director Pjetraj, to discuss the revised methodologies as well as actions taken by Chemours specific to the VE-North Indoor Air Emissions captured by a Carbon Adsorber. This discussion would include a schedule for compliance with the 12-month rolling calculation based on the revised emission calculation methodologies.

Please direct any questions to christel.e.compton@chemours.com or call me at 910-678-1213.

Sincerely –

A handwritten signature in black ink that reads "Christel Compton". The signature is written in a cursive, flowing style.

Christel Compton
Environmental Manager, Fayetteville Works

Attachment

cc. Dawn Hughes, Chemours (e-copy)
Mike Abraczinskas, DAQ (e-copy)
Michael Pjetraj, DAQ (e-copy)
Heather Carter, DAQ (e-copy)
Christy Richardson, ERM (e-copy)

Chemours - Fayetteville Works GenX Emissions Summary

12-Month Rolling Emissions

(Per Permit Condition 2.2.D.1)

Month	Notes	Equipment / Fugitive Emissions (lbs)	Accidental Release Emissions (lbs)	Thermal Oxidizer Emissions (lbs)	Other Process Emissions (lbs)	Monthly Facility-Wide Emissions (lbs)	12-Month Rolling Sum of Facility-Wide Emissions (lbs)
January 2020	Actual	1.287	0.010	0.003	0.080	1.380	--
February 2020	Actual	0.498	0.000	0.001	0.157	0.656	--
March 2020	Actual	1.465	0.035	0.006	0.048	1.554	--
April 2020	Actual	1.086	0.000	0.004	0.136	1.226	--
May 2020	Actual	1.280	0.391	0.004	0.086	1.761	--
June 2020	Actual	1.626	0.084	0.007	0.037	1.754	--
July 2020	Actual	1.292	0.009	0.004	0.106	1.411	--
August 2020	Actual	0.309	0.000	0.001	0.018	0.328	--
September 2020	Actual	2.054	0.002	0.002	0.063	2.121	--
October 2020	Actual	0.000	0.000	0.000	0.020	0.020	--
November 2020	Actual	1.388	0.136	0.006	0.234	1.764	--
December 2020	Actual	1.152	0.029	0.007	0.200	1.389	15.366
January 2021	Actual	2.277	0.000	0.002	0.357	2.636	16.622
February 2021	Actual	1.220	0.122	0.005	0.309	1.656	17.622
March 2021	Actual	12.426	0.098	0.006	0.107	12.637	28.705
April 2021	Actual	2.299	0.000	0.002	0.102	2.403	29.881
May 2021	Actual	2.657	0.191	0.006	0.193	3.048	31.167
June 2021	Actual	2.287	0.195	0.007	0.122	2.611	32.024
Annual Emissions Limitation						23.027	