

Division of Air Quality

December 11, 2020

MEMORANDUM

To: Heather Carter, Fayetteville Regional Supervisor

From: Gary L. Saunders, Stationary Source Compliance Branch 

Subject: The Chemours Company – Fayetteville Works  
Fayetteville, Bladen County, North Carolina  
Facility ID. No. 0900009, Permit No. 03735T48  
Performance Testing for HFPO Dimer Acid (GenX) Conducted on September 2, 2020 at the Polymer Processing Aid (PPA) Carbon Bed Adsorber by Ramboll (formerly O'Brien and Gere Engineers, Inc.)  
Tracking No. 2020-311ST

## Summary of HFPO Dimer Acid Test Program

### Sources Tested

During September 2, 2020, emissions testing was conducted on the Polymer Processing Aid (PPA) area. HFPO Dimer Acid Fluoride (HFPO DAF) produced in the VEN process is used to produce HFPO dimer acid (also known as GenX). There are a number of products that may be produced at PPA depending upon the raw materials and the final product needs. Process gases pass through the PPA scrubber which is a pH controlled packed bed scrubber. Chemours has added a carbon bed adsorber following the scrubber for additional control of GenX. Fugitive emissions from enclosed areas of the PPA process (i.e., room air) are also vented through the PPA carbon bed adsorber though it does not pass through the scrubber prior to the adsorber. Testing was conducted at the inlet to the carbon bed and at the stack to determine the overall reduction efficiency to GenX emissions due to the addition of the carbon bed adsorber.

### Sampling Method

Testing was conducted using a modified EPA Method 0010 found in the SW-846 compendium of *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*. This sampling train is a variation of the EPA Reference Method 5 found in 40 CFR 60, Appendix A. The Method 0010 train extracts a sample isokinetically from the gas stream, passes the sample through a temperature-controlled filter, through a temperature-controlled condenser and into a series of XAD-2 resin "traps" and impingers to capture and collect the materials that passed through the filter. The test method is designed to capture certain particulate and condensable materials for later recovery and analysis.

After sample recovery, the samples were sent to Chemours' contractor, Eurofins Test America's laboratory in Denver, Colorado. GenX was extracted from the resin traps. This summary of results only addresses the results provided by Eurofins (Test America) for Chemours. Laboratory analysis and quantification was performed using a liquid chromatography column and a dual mass spectrometer (LC/MS/MS).

## Test Results

The reported GenX test results reflect corrected emission rates accounting for dilution and spike recovery values.

### PPA Area Test Results

GenX emissions testing of the PPA carbon bed inlet and the PPA Area Stack (for carbon bed outlet results) was conducted on September 2, 2020. Three runs were conducted to characterize the emissions reduction by the carbon bed during the various steps in the PPA process. The per run emission rate and average for three runs is displayed in the table below. Inlet and outlet volumetric flow rates were within the normal variation that we expect between independent measurements.

As noted in the test report, the values reported in the Table do not include the analytical data for the XAD-2 Breakthrough Resin Trap as the data indicated that sample contamination had occurred. The XAD-2 resin values were considerable higher than those obtained from the impinger condensate values.

**Table 1. PPA Carbon Bed Adsorber Test Results, September 2, 2020**

	<b>Inlet</b>	<b>Outlet</b>	<b>Removal Efficiency</b>
	<b>lb/hr</b>	<b>Lb/hr</b>	<b>%</b>
<b>Run 1</b>	7.30E-03	2.73E-04	96.26
<b>Run 2</b>	5.92E-03	8.79E-05	98.52
<b>Run 3</b>	4.96E-03	4.37E-04	91.19
<b>Average</b>	6.06E-03	2.66E-04	95.61

## Summary and Conclusions

NC DAQ personnel did not observe this test due to COVID-19 safety concerns. Based upon the review of the test report, NC DAQ concludes that the testing was conducted in accordance to the modified testing protocol submitted by Chemours and that the analytical results appear representative of the stack conditions and process operations during the testing.

Cc: Central Files – Bladen County  
IBEAM Documents - 0900009