



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

ELIZABETH S. BISER
Secretary

March 2, 2022

Ms. Dawn Hughes
Plant Manager
Chemours Fayetteville Works
22828 NC Highway 87 W
Fayetteville NC 28306

RE: Notice Regarding Chemours' Obligations Under Consent Order and 15A NCAC 02L .0106 - Offsite Groundwater Assessment and Provision of Replacement Drinking Water Supplies.

Dear Ms. Hughes:

The North Carolina Department of Environmental Quality (DEQ) has reviewed the February 1, 2022 documents from Chemours in response to our November 3, 2021 Notice Regarding Chemours' Obligations Under Consent Order and 15A NCAC 02L .0106 - Offsite Groundwater Assessment and Provision of Replacement Drinking Water Supplies. DEQ's November 3rd letter stated that Chemours is responsible for contamination of groundwater wells and water supply wells in New Hanover County and potentially downstream counties affected by PFAS contamination in the Cape Fear River. Pursuant to paragraphs 19-24 of the Consent Order, Chemours is required to provide replacement drinking water supplies for affected parties. Chemours' response included a cover letter, the Interim Four Counties Sampling and Drinking Water Plan, and the Framework to Assess Table 3+ PFAS in New Hanover, Brunswick, Columbus, and Pender Counties.

Interim Four Counties Sampling and Drinking Water Plan

The Interim Four Counties Sampling and Drinking Water Plan is insufficient and must be expanded in scope and detail as described in the comments below. We consider this an interim plan that describes initial sampling to inform a more robust and comprehensive sampling plan. The priority in the Lower Cape Fear counties, as it is around the Chemours facility, is to expeditiously identify impacted drinking water by Table 3+ PFAS and to provide alternate drinking water as required by the Consent Order.

Within **30 days** of receipt of this letter, Chemours must submit a revised interim plan addressing the following comments:



North Carolina Department of Environmental Quality
217 West Jones Street | 1601 Mail Service Center | Raleigh, North Carolina 27699-1601
919.707.8600

1. Chemours must expand the eligibility criteria in Section 2.1.3 to include private wells located in the vicinity of areas of direct application or injection of river water and private wells in the vicinity of areas where existing data shows the presence of PFAS associated with the Fayetteville Works facility. In addition, it is recommended that the eligibility criteria be expanded to include private wells in the vicinity of tributaries to the Cape Fear River and in floodplains.
2. Chemours must expand sampling conducted under Step 1A to include sampling of a representative group of private wells in each county that meet the eligibility criteria in Section 2.1.3 as modified that is not limited to individuals who have requested sampling. The revised Interim Plan must provide Chemours' rationale for determining which private wells to include in the representative sampling. Such representative sampling shall be commenced within **45 days** of receipt of this letter. Representative sampling shall not be limited to 200 private wells in each county. Instead, Chemours should take a data-driven approach that aims to identify a representative population upon which to base further sampling efforts. DEQ may require expanded representative sampling if it determines that Chemours' proposal is insufficient.
3. The revised Interim Plan must provide that sampling include not only residences, but other property types where a private well is used as the primary source of drinking water, including schools and day cares, churches, mobile home parks, healthcare facilities, commercial properties, etc.
4. Chemours must directly contact the private well owners who meet the eligibility criteria in Section 2.1.3 as modified to offer testing.
5. Residents who contact Chemours to request testing must all be logged in Chemours' database of sampling requests, even if they do not qualify for testing in this first round of sampling.
6. Chemours must provide bottled water within 3 days of receipt of testing results to impacted locations with detections of Table 3+ compounds at or above 10 parts per trillion (ppt) for an individual compound or 70 ppt combined. In addition, Chemours must provide replacement drinking water supplies as required in paragraphs 19 and 20 of the Consent Order.
7. The revised Interim Plan must describe a proposed step out or other systematic approach to drinking water sampling based on the results of data collected under Steps 1A and 1B as modified. For example, if sampling near the river finds contamination, Chemours should describe an approach for conducting sampling to determine the extent of the contamination.

A revised Interim Four County Sampling and Drinking Water Plan shall be submitted to DEQ for review within 30 days of receipt of this letter.

Framework to Assess Table 3+ PFAS in New Hanover, Brunswick, Columbus, and Pender Counties

DEQ is continuing to review the Framework to Assess Table 3+ PFAS in New Hanover, Brunswick, Columbus, and Pender Counties and will provide comments at a later time.

* * *

We appreciate your attention and prompt response in this matter. If you have any questions, please feel free to contact me at (919) 707-8700.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sushma Masemore', with a stylized flourish at the end.

Sushma Masemore, P.E.
Assistant Secretary for Environment, DEQ