



NEW HANOVER COUNTY

HEALTH & HUMAN SERVICES

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February 18, 2022

Elizabeth S. Biser, Secretary
North Carolina Department of Environmental Quality
1601 Mail Service Center
Raleigh, NC 27699-1601

Dear Secretary Biser,

Regarding the recently delivered Chemours Interim Four Counties Sampling and Drinking Water Plan (New Hanover, Brunswick, Columbus, and Pender Counties), dated February 1, 2022, please consider the below input and requests from my public health vantage when considering the adequacy of Chemours' plan for New Hanover County.

Generally, the scope and timing of the Chemours plan falls well short of a robust plan to protect our residents and visitors' health and well-being, in particular compared to the scope and timing of actions in the counties adjacent to the Chemours Fayetteville Works plant.

The limited scope of the proposed plan does not meet the goal set out in the other affected counties and in concert with the consent order, which is to find the full extent of the contamination wherever the data leads in a stepwise methodology. This comprehensive stepwise approach is the only way to assure protection of the health of all our residents going forward. Chemours proposes to sample only "up to 200" drinking water wells based on "features of interest" such as within ½ mile of the Cape Fear River versus following the established methodology used in other counties of testing around known locations where Chemours chemicals have already been found in drinking water wells.

New Hanover County has approximately 20,000 wells that have been permitted by our Public Health Department, and Chemours' plan offers to sample less than .1% of those wells – which is a disservice to our residents who deserve to know and understand any potential impacts to their drinking water and their health.

Further, their plan indicates they will only test "private wells". Section 2.1.3 of their plan appears to include only residential wells. This leaves out many drinking water wells on commercial properties, schools, nursing homes, daycares, and others that also must benefit from these interventions to protect our public's health.

The proposed plan also falls short on Chemours obligation to engage New Hanover County residents to inform and educate them about the availability of testing. They rely on limited communications and expect community residents to contact Chemours to request testing vs. the methodology used to date in other counties where properties with wells are engaged directly due to their being within proximity to a well known to have PFAS present.

With respect to the timing of this plan, our residents have been exposed to these harmful chemicals at unknown and possibly very high levels, for decades, yet Chemours proposes to wait another six months after the plan approval to begin sampling and testing well water in New Hanover County. This is an insult and a blatant disregard for the health and welfare of our residents and visitors. Sampling should begin within two months, as happened for the other counties where sampling began within approximately two months after the discovery of PFAS in groundwater near the plant.

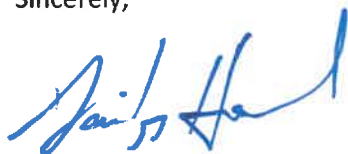
The plan should also include a clear recognition and commitment to mitigate drinking water to meet all future EPA health goals for PFAS in drinking water. We believe this is imperative, as we anticipate science around health impacts from PFAS will evolve over time resulting in updated health goals and our residents should benefit from the most up-to-date information to protect their health.

In closing, the main reason this contamination requires action and mitigation is to protect public health, inclusive of our natural environment we all deserve to enjoy and benefit from without concern of harmful chemicals in our ground and surface waters. While research is continuing, EPA currently indicates harmful health risks from PFAS exposure based on peer-reviewed scientific studies showing that exposure to certain levels of PFAS may lead to reproductive effects such as decreased fertility or increased high blood pressure in pregnant women; developmental effects or delays in children including low birth weight, accelerated puberty, bone variations, or behavioral changes; increased risk of some cancers including prostate, kidney, and testicular cancers; reduced ability of the body's immune system to fight infections including reduced vaccine response; interference with the body's natural hormones; increased cholesterol levels and/or risk of obesity. We respectfully ask for clear recognition of these health risks as the imperative to move quickly and decisively to remediate said risks, and that all due urgency be applied in requiring Chemours to alleviate this risk to our collective health and well-being.

I also request that a primary contact be established at NCDEQ for New Hanover County's involvement in this plan and the Consent Order, so that a consistent line of communication can be established for questions and needs that arise throughout this process. I, as New Hanover County's Public Health Director, will serve as the county's primary contact to help ensure the public's health is kept at the forefront.

Thank you for your consideration of these requests and concerns as you evaluate Chemours' plan for our community.

Sincerely,



David Howard, MPH

New Hanover County Public Health Director