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

May 18, 2022

Sushma Masemore, P.E.
Deputy Assistant Secretary for Environment & State Energy Director
1601 Mail Service Center
Raleigh, NC 27699-1601
sushma.masemore@ncdenr.gov

Re: **Revised EPA Method 537Mod for Site-Related PFAS, Chemours Fayetteville Works, Fayetteville, NC**

Dear Ms. Masemore,

Chemours is writing to inform NCDEQ of expanded capabilities with analytical method EPA Method 537Mod at its commercial laboratories Eurofins TestAmerica-Sacramento (Sacramento, CA; SAC) and Eurofins Lancaster Laboratories Environmental (Lancaster, PA; LANC). EPA Method 537Mod has been revised by the laboratories to include polyfluoroalkyl substances (PFAS) from the Table 3+ analyte list (see Enclosure 1 for a list of the Table 3+ analytes with SAC reporting limits). This version of EPA Method 537Mod has been named EPA Method 537Mod Max (often shortened to 537MM).

Chemours plans to use 537MM at its discretion for the analysis of samples related to Fayetteville Works, including private well samples. In support of this, Chemours is including the following documentation with this letter:

- Standard Operating Procedures (SOPs) for 537MM for both SAC (Enclosure 2) and LANC (Enclosure 3). Note that both redacted and unredacted versions of the SOPs are provided. The unredacted versions are for NCDEQ's use only;
- A report detailing the analysis of 30 samples by both 537MM and Method Table 3+ at both SAC and LANC demonstrates analytically equivalent performance for Table 3+ analytes between the Table 3+ and 537MM analytical methods (Enclosure 4); and
- A memo detailing the results of a matrix interference study conducted on Cape Fear River water with 537MM which demonstrates the acceptable quality of the analyses with regards to matrix interference for Table 3+ analytes by 537MM (Enclosure 5).

Of note, 537MM retains the 17 Table 3+ compounds for which reliable analytical capabilities are available by the T3+ Method as well as the 3 diprotic compounds which experience significant matrix issues. In addition, 537MM provides the ability to analyze for PFPrA (formerly referred to as PPF Acid) and MTP, but with the note that unlike the standard 17 Table 3+ PFAS results, PFPrA and MTP results demonstrate additional analytical variability due to the compounds' early elution from the liquid chromatograph column. Additionally, 537MM provides

reporting limits for PMPA and PEPA below 10 nanograms per liter (ng/L) consistent with the replacement drinking water criteria in Consent Order paragraph 20.

If you have any questions, please contact me at Dawn.M.Hughes-1@chemours.com.

Sincerely,

Dawn M. Hughes
Plant Manager
Chemours – Fayetteville Works

Enclosures

1: Table 3+ Analytes and Reporting Limits of 537MM at SAC
2: SOP: Per- and Polyfluorinated Alkyl Substances (PFAS) in Water, Soils. Sediments and Tissues
3: SOP: Client specific-Polyfluorinated Alkyl Substances (PFAS) in Aqueous Samples Using Isotope Dilution and LC/MS/MS
4: Method Table 3+/Table 6 vs. EPA Method 537Mod Max Analytical Method Comparison
5: Matrix Interference During PFAS Analysis via Method 537 Mod Max

Cc:

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