



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

March 1, 2019

Sheila Holman
Assistant Secretary for the Environment
1601 Mail Service Center
Raleigh, NC 27699-1601
sheila.holman@ncdenr.gov

Re: Request for Laboratory Approval Pursuant to Consent Order Paragraph 14

Dear Ms. Holman,

Paragraph 14 of the Consent Order states: “Within thirty (30) days of entry of this Consent Order, Chemours shall submit a plan and proposed schedule for review and approval by DEQ for funding and facilitating the conducting of an initial set of toxicity studies by a qualified third party approved by DEQ relating to both toxicity assays informative to human health and aquatic life sufficient to aid in development of surface water and groundwater regulatory standards for up to five PFAS as determined by DEQ.”

Chemours is hereby seeking DEQ’s approval of the third parties Chemours proposes to retain for conducting the toxicity studies under Paragraph 14, so that the necessary work can proceed on schedule.

For the human health (mammalian) toxicity studies, Chemours proposes to retain Charles River Laboratories (<https://www.criver.com>). Charles River Laboratories has over 40 years of experience in designing rodent toxicity studies to meet chemical developmental and regulatory requirements in the United States, Europe, and Japan, with a focus on quality, safety, efficacy, and timeliness.

For the aquatic life (ecological) toxicity studies, Chemours proposes to retain EAG Laboratories (<https://www.eag.com>). EAG Laboratories has an extensive team of chemists, biologists, and toxicologists in the United States, Europe, and Asia that have evaluated the environmental impact of thousands of chemicals, including those in pesticides, pharmaceuticals, and industrial and consumer products. EAG Laboratories has also helped develop test methods that shape current regulatory guidelines around the world.

Please confirm that Charles River Laboratories and EAG Laboratories are acceptable to DEQ for conducting the toxicity studies under Paragraph 14. If you have any questions or need further information, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Brian D. Long". The signature is written in a cursive style with a horizontal line underneath it.

Brian D. Long
Plant Manager
Chemours – Fayetteville Works

Cc:

William F. Lane, DEQ
Francisco Benzoni, NC DOJ
Michael Abraczinskas, DAQ
Michael Scott, DWM
Linda Culpepper, DWR
David C. Shelton, Chemours
John F. Savarese, WLRK
Kemp Burdette, CFRW
Geoff Gisler, SELC