

June 18, 2019

Linda Culpepper Interim Director, Division of Water Resources 1611 Mail Service Center Raleigh, NC 27699-1611 linda.culpepper@ncdenr.gov

Re: Laboratory Analyses for MTP, MMF, DFSA, and PPF Acid

Dear Ms. Culpepper,

I am writing to follow up on our June 10 letter and June 12 conference call with DEQ in regard to the four PFAS compounds shown below:

Acronym	Name	Molecular Formula	CASN	Chemical Structure
MTP	Perfluoro-2- methoxypropanoic acid	CH3-O- CF2-CF2- COOH	93449- 21-9	H ₃ C O F F OH O
MMF	Difluoromalonic acid	HOOC- CF2- COOH	1514- 85-8	H O H
DFSA	Difluoro-sulfo- acetic acid	HOOC- CF2- SO3H	422-67-3	HO OH OH
PPF Acid	Perfluoropropionic acid	CF3-CF2- COOH	422-64- 0	F F OH

As we noted in our letter and discussed on our conference call, the laboratory analytical methods for these four compounds are new and not refined (and previously did not exist), and the resulting data quantifications are not accurate. Our external testing laboratories, Eurofins Lancaster Laboratories ("Lancaster") and TestAmerica, have prepared summaries of the technical issues they have encountered, and these summaries are enclosed.

Accordingly, to prevent the collection and dissemination of inaccurate and misleading data, we have instructed Lancaster and TestAmerica to stop analyzing and reporting for these four compounds under their current laboratory analytical methods (referred to as "Table 3+"). We will continue to work with these labs on analytical method development and finding an appropriate testing methodology for these four compounds, and we will keep you apprised of our progress.

Please let me know if you have any questions.

Sincerely,

Brian D. Long Plant Manager

Chemours – Fayetteville Works

Brin O Lay

Enclosures

Lancaster Technical Summary
TestAmerica Technical Summary

Cc:

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