



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

February 1, 2022

Sushma Masemore  
Assistant Secretary  
N.C. Department of Environmental Quality  
1601 Mail Service Center  
Raleigh, NC 27699-1601  
[sushma.masemore@ncdenr.gov](mailto:sushma.masemore@ncdenr.gov)

Re: DEQ's 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" (the "November 3 Notice")

Dear Ms. Masemore,

As requested by DEQ, Chemours is submitting herewith a "Framework to Assess Table 3+ PFAS in New Hanover, Brunswick, Columbus, and Pender Counties" (the "Assessment Framework") and an "Interim Four Counties Sampling and Drinking Water Plan (New Hanover, Brunswick, Columbus, and Pender Counties)" which will include the sampling of groundwater from private wells in the four counties as requested by the well owners. Both documents were prepared by Chemours' Consultant Geosyntec Consultants of NC, PC.

Because there may be significant public interest in this response and the referenced submissions, we want to emphasize the following points:

- We understand that this letter but not necessarily the submissions may be circulated to certain interested parties in pending litigation. Those parties should be aware that the submissions are available on the Chemours website at <https://www.chemours.com/en/about-chemours/global-reach/fayetteville-works/compliance-testing>.
- For Chemours to move forward with the Assessment Framework, it is critical that it receive timely and complete responses to pending public records requests submitted in November 2021 to DEQ. As we have in the past, we ask that DEQ prioritize its responses. We are also seeking prompt responses to similar requests sent to the four counties and others in possession of relevant information.
- The Assessment Framework hypothesizes based on available information that the PFAS identified in the limited well sampling done in New Hanover County do not come from air or groundwater migration from the Facility, but rather from the migration of PFAS from the Cape Fear River to groundwater, including from "leaking potable water distribution pipes and sanitary sewers that convey water

from the Cape Fear River.” This is unlike the situation in Bladen and Cumberland Counties, nearer to the Facility, as provided for in the current off-site program under the Consent Order.<sup>1</sup> Therefore the goal of the Assessment Framework is to understand the source and pathways of PFAS found in private drinking water wells in the four counties.

- While Assessment implementation will take some time, we note that while the well data that has been shared is from New Hanover County, and that includes information that is three years old (as the Notice indicates that the sampling has been conducted by DEQ since “early 2019”), none of the data suggest exceedances of any health based drinking water levels in the eleven private drinking water wells sampled by NCDEQ.
- As set forth in the Interim Four Counties Sampling and Drinking Water Plan, Chemours will, if requested by a resident with a private well meeting certain criteria, conduct water quality testing (for PFAS and other contaminants that may be chosen for analysis), and report the results to the resident. The criteria for conducting such testing during this initial phase are that: (i) the private well is the primary source of drinking water on the property, and (ii) the private well is either within half of a mile of the Cape Fear River or within a public water service area and/or sanitary sewer networks. If the testing shows the presence of any compound listed in Attachment C to the Consent Order over 10 parts per trillion or 70 parts per trillion in the aggregate (as set forth in the Consent Order), Chemours will provide the resident with an initial supply of bottled drinking water and a voucher for obtaining additional bottled drinking water conveniently from stores. Anyone seeking testing of their well under this program will be able to contact Chemours after February 15, 2022 at (910) 678-1100.

If you have any questions or would like to discuss this matter further, please contact me at [Dawn.M.Hughes-1@chemours.com](mailto:Dawn.M.Hughes-1@chemours.com).

Sincerely,



Dawn M. Hughes  
Plant Manager  
Chemours – Fayetteville Works

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<sup>1</sup> For purposes of this submission, Chemours is not disputing that paragraph 24 of the Consent Order and related paragraphs apply to private wells in the four counties. Chemours reserves its ability to raise such a dispute depending on the results of this process.