



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

June 10, 2020

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

Re: Consent Order - Updates to Laboratory Analytical Test Methods

Dear Ms. Holman,

Pursuant to the Consent Order, Chemours previously submitted to DEQ two laboratory analytical test methods for PFAS compounds in water at Fayetteville Works—namely, the Modified Method 537 and Table 3 Plus Method. TestAmerica and Lancaster Laboratories (third-party laboratories approved by DEQ) have used these methods for analysis of PFAS in aqueous samples collected by Chemours pursuant to the Consent Order. At DEQ's direction, Chemours has been working with both of these laboratories to make refinements to the analytical test methods. As a result of this work, both laboratories recently issued an updated Table 3 Plus Method as well as a new Table 6 Method for certain compounds previously analyzed using the Table 3 Plus Method, and they are now using these methods for their analyses, as explained further below.

Redacted versions of the updated Table 3 Plus Method and Table 6 Method from TestAmerica and Lancaster Laboratories are enclosed. Because the unredacted versions of the methods contain proprietary and confidential business information, we will send them under separate cover directly to you and they will not be posted on Chemours's website or otherwise made publicly available. Also enclosed here is a technical memorandum from TestAmerica regarding the revisions made in the updated Table 3 Plus Method. Among other refinements, the updated Table 3 Plus Method has added PFHpA as a target analyte (this compound was previously analyzed using Modified Method 537).

At this time, the Table 6 Method is only finalized and being used for two compounds—PEPA and PMPA. These two compounds were previously analyzed using the Table 3 Plus Method, and the Table 6 Method now provides a lower detection limit. Chemours, TestAmerica, and Lancaster Laboratories are in the process of performing additional experiments to finalize the Table 6 Method for the four remaining compounds listed therein—DFSA, MMF, MTP, and PPF Acid. Once the analysis from these experiments is completed, Chemours will inform DEQ and either note that the Table 6 Method as enclosed here is final for all listed compounds or provide an updated Table 6 Method if there are any changes resulting from the experiments.

If you have any questions, please contact me at [Brian.D.Long@chemours.com](mailto:Brian.D.Long@chemours.com).

Sincerely,

A handwritten signature in black ink that reads "Brian D. Long". The signature is written in a cursive style with a large initial "B" and a stylized "L".

Brian D. Long  
Plant Manager  
Chemours – Fayetteville Works

Enclosures

Updated Table 3 Plus Method (redacted), TestAmerica

Updated Table 3 Plus Method (redacted), Lancaster Laboratories

Table 6 Method (redacted), TestAmerica

Table 6 Method (redacted), Lancaster Laboratories

Technical Memorandum Regarding Updated Table 3 Plus Method Revisions, TestAmerica

Cc:

William F. Lane, DEQ

Francisco Benzoni, NC DOJ

Michael Abraczinskas, DAQ

Michael Scott, DWM

Danny Smith, DWR

David C. Shelton, Chemours

John F. Savarese, WLRK

Kemp Burdette, CFRW

Geoff Gisler, SELC