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FW: Chemours NPDES permit review Fayetteville, NC
To: CMS.OEX@epamail.epa.gov

From: (b) (6) mailto:(b) (6)
Sent: Tuesday, June 20, 2017 10:38 AM
To: Pruitt, Scott <Pruitt.Scott@epa.gov>
Subject: Chemours NPDES permit review Fayetteville, NC

I am writing to ask that you become personally engaged in the NPDES permit review currently underway with Chemours for its facility in Fayetteville, NC. Chemours has discharged a toxic substance called "GenX" into the Cape Fear River and has done so since about 1980. But that information had not been publicly disclosed by Chemours until recently discovered and reported by third parties.

The Cape Fear River in southeast North Carolina is the primary drinking water source for several municipal water treatment companies in this area. Water treating utilities do not have the ability to remove GenX so it ends up in the public drinking water supply in this area.

Toxicological studies have suggested that GenX be listed as a suspected human carcinogen.

Chemours and its prior owner duPont have a poor track record producing certain toxic substances. GenX was developed by duPont/Chemours to replace C8. Over many decades, duPont contaminated drinking water in communities surrounding sites at which it manufactured C8. duPont withheld toxicological information that showed C8 to be a human carcinogen and ultimately settled related litigation. It ceased C8 manufacture, developed GenX as a replacement and then spun off the associated operations and all of the legacy liabilities into a new company called Chemours.

Because GenX is a "new" substance, Chemours are able to operate at the site in Fayetteville, NC with very limited discharge controls or limits. The consent decree issued in 2009 expressly indicates that all GenX is to be kept from being discharged into waterways. However, the NPDES permit currently under review does not effectively limit GenX discharges. Apparently, there are some controls in place for the primary GenX manufacturing process. However, there is another process, from which GenX is produced as a "co-product" which does not appear to have any controls or restrictions on discharge of GenX into the Cape Fear River. Chemours have admitted that they have released GenX into the Cape Fear River from this process since 1980. But because there are no discharge limits established in the permit, Chemours proudly states that "we are 100% in compliance with our permits, 100% of the time."

The NPDES permit for this facility has recently expired and is currently under review. Why is Chemours allowed to discharge these toxic materials into the Cape Fear River at all? Why do its operating permits allow this with no requirement for containment, measurement, monitoring and reporting of discharges of this toxic substance? This makes no sense and needs to be corrected.

The EPA should immediately exercise its authority to cause a shutdown of GenX production (or co-production) at the Fayetteville site until proper controls are in place to protect public drinking water sources. Furthermore, the NPDES permit, currently under review, needs to be substantially amended to incorporate proper controls, monitoring & reporting requirements.

I know there are many political forces underway to defang the EPA. But for God's sake, how can the EPA almost seem to foster the discharge of these toxic materials into public waterways and drinking water sources? Please help us to get this issue corrected.

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