

Blue Ridge Environmental Defense League

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VIA Email

Secretary Elizabeth Biser

North Carolina Department of Environmental Quality

217 West Jones Street

Raleigh, North Carolina 27603

June 6, 2022

Dear Secretary Biser:

I write on behalf of Blue Ridge Environmental Defense league (BREDL) to express our concern regarding the Total Organic Fluorine (TOF) method report that Chemours submitted to the Division of Air Quality (DAQ). The Chemours facility has caused massive pollution in the Cape Fear region and the pollution is ongoing. Thousands of people have been impacted.

Upon review of the TOF method report, we are sharing comments and questions below:

- A “thermal oxidizer” is a fancy name for an incinerator. Industry agrees.
- Available data does not show that thermal technologies can safely destroy perfluorinated compounds.
- When perfluorinated compounds are burned-they create other substances like fluorinated dioxins, furans, PCBs, and hydrochloric acid. Hydrochloric acid is highly toxic, corrosive, and can damage the incinerator.

- According to the report- **only 2% of what is being emitted from the thermal oxidizer is known.** When chlorinated chemicals are burned, other substances are formed. There are no standards for most of these—which means they cannot be measured. See chart from page 41 of the report:

Table 16. Total Organic Fluorine Results Compared to Target LC-MS/MS Analysis for Air Samples*

Sample ID	Volume Received (mL)	Total Organic Fluorine (µg/L)	LC-MS/MS Results for HFPO-DA (µg/L)	Unknown Organic Fluorine (%)
140-24648-1	8	580 ± 1.7	15.4	98
140-24648-2	8	430 ± 1.6	573	15
140-24648-3	7	230 ± 0.9	46.0	87
140-24648-4	8	230 ± 2.1	1.13	> 99
140-24648-5	8	160 ± 0.6	5.39	98
140-24648-6	8	280 ± 1.3	911	> 106
140-24648-7	8	120 ± 1.2	58.3	69
140-24648-8	8	190 ± 2.4	2.86	99
140-24649-1	7	150 ± 1.3	0.667	> 99
140-24649-2	8	900 ± 1.1	0.193	> 99
140-24649-3	7	170 ± 0.7	0.0239	> 99
140-24649-4	8	110 ± 3.2	0.0009	> 99
140-24649-5	9	50 ± 1.7	1.04	> 99
140-24649-6	8	100 ± 1.7	0.158	> 99
140-24649-7	8	140 ± 2.4	0.0286	> 99
140-24649-8	8	90 ± 0.9	0.0014	> 99

*Air samples were provided as methanol extracts and were received at the University of South Carolina on December 2, 2021; results represent a mean of duplicates.

- How will DAQ determine what is being emitted?

The efficiency of the Chemours thermal oxidizer and accuracy of the reported emissions are uncertain. The report shows that something akin to “dark matter” is likely being emitted—we know it exists; but exactly what it *is* has not been determined. The communities around the facility continue to be affected by the sins of the past—and those sins are still being uncovered. State and federal agencies have enabled this by inaction.

Transferring a pollutant from one medium to another is a virtual shell game. It is incumbent on the Department of Environmental Quality to take steps to ensure that public health is protected. The public deserves to know *exactly* what is coming out of the thermal oxidizer’s stacks, especially considering allegations that the company intentionally misled the Department about discharges into waterways and that it has violated its air permit. Anything less is unacceptable.

Sincerely,



Therese Vick

North Carolina Healthy, Sustainable Communities Campaign Coordinator