UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MAY 0 3 2018

Mr. Andrew Hartten
Principal Project Manager-Corporate Remediation
The Chemours Company
1007 Market Street, #3094
Wilmington, DE 19899

Re: Request for sampling; GenX in water supplies

Dear Mr. Hartten:

In a January 11, 2018 letter (enclosed), the U.S. Environmental Protection Agency (EPA) Regions 3 and 5 requested that Chemours test fourteen public and private water supplies in West Virginia and Ohio for the compound GenX, which has been used at the Chemours Washington Works facility located in Parkersburg, West Virginia for the manufacture of Teflon. The water supplies were selected due to the high concentrations of the compound PFOA which were detected in the course of routine monitoring required under a series of Safe Drinking Water Act Orders issued by EPA. PFOA had been used in the Teflon manufacturing process prior to the use of GenX in 2013.

The results of the GenX monitoring indicate the presence of GenX in the raw (untreated) water in nine of the fourteen water supplies that Chemours tested. The raw water concentrations ranged from non-detectible to 81 parts per trillion (ppt). These results indicate that GenX is present in the ground water in communities near the Washington Works facility. GenX was non-detectible when collected after carbon filtration treatment, which is in place at each of the fourteen water supplies. Moreover, the presence of GenX in the Ohio water supplies suggests the compound is being dispersed into the air through the facility smokestack in a similar manner to the historic dispersion of PFOA.

After consulting with the West Virginia Department of Health and Human Resources (WVDHHR) and the Ohio Environmental Protection Agency (OH EPA), the agencies agreed that it is necessary to more fully characterize the presence and exposure of GenX in the communities near the Washington Works facility. We therefore request that Chemours continue to monitor, on a quarterly basis, twelve of the fourteen public and private water supplies selected for GenX sampling in the January 11, 2018 letter. (You notified us that two residences in the original group sampled have since been connected to public water and no longer receive quarterly monitoring.) In addition, we request that Chemours also sample for GenX at an additional nine private water supplies and two additional public water supplies to more fully characterize the extent of exposure to GenX via air deposition and subsequent groundwater contamination. Finally, you informed us that Chemours is currently testing for GenX, on a biweekly basis, in each of the three public water supply wells which serve the Washington

Works facility. We request that Chemours provide those biweekly sampling results to EPA and the WVDHHR on an ongoing basis within one week of receipt of the results from the laboratory.

The updated list of water supplies to be sampled quarterly for GenX is provided in the enclosed table. Each of the selected water supplies is currently being treated with granulated activated carbon for PFOA removal. As before, Chemours should collect samples from both the raw (untreated) and the finished (treated) water and analyze them for GenX. Please conduct GenX testing in the next round of regularly scheduled monitoring for the identified drinking water systems.

Thank you for your cooperation in this matter. All data can be sent, as before, to Mr. Reinhart, EPA Region 3, and Ms. Wilson, EPA Region 5. Along with providing these results to EPA, results should also be sent to the following persons at WVDHHR and the Ohio EPA:

Meredith Vance
West Virginia Bureau for Public Health
Office of Environmental Health Services
Environmental Engineering Division
350 Capitol Street, Room 313
Charleston, WV 25301-3713

Beth Messer
Drinking Water Assistant Chief
Lazarus Government Center
Ohio EPA - DDAGW
50 W. Town St., Suite 700
Columbus, OH 43216-1049

If you have any questions, please contact Roger Reinhart at 215-814-5462 or Jennifer Wilson at 312-353-3115.

Sincerely,

Catharine McManus, Acting Director
Water Protection Division

Enclosures

Cc: Bradley Aulick, The Chemours Company
Meredith Vance, West Virginia Bureau for Public Health
Patrick Murphy, WVDHHR
Beth Messer, Ohio EPA

GenX Sampling Locations near Chemours Washington Works facility – Washington, WV

Requested to be completed within the 2nd Quarter (April – June) of 2018

Ohio Sampling Locations

Ohio Public Water Systems	
PWS ID	**Name of Water System**
OH8400012	Belpre Public Works
OH8400212	Little Hocking Water Association
OH5300612	Tuppers Plains-Chester Water District

Ohio Private Drinking Water Wells
Chemours Location Number
372
608
60
493
596
772
753
748
546
148

West Virginia Sampling Locations

West Virginia Public Water Systems	
PWS ID	**Name of Water System**
WV3305404	Lubeck Public Service District
WV9954007	Chemours Washington Works
WV3305411	Vienna Public Water Service District

West Virginia Private Drinking Water Wells
Chemours Location Number
601
429
355
670
653
706
610*

*It's understood that this is a summer residence and isn't visited on a quarterly basis. Please collect samples at the next appropriate time.

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JAN 11 2018

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Principal Project Manager-Corporate Remediation
The Chemours Company
1007 Market Street, #3094
Wilmington, DE 19899

Re: Request for sampling; GenX in water supplies

Dear Mr. Hartten:

The Environmental Protection Agency (EPA) Regions 3 and 5 have issued a series of Safe Drinking Water Act Orders in 2002, 2006 and 2009 to E.I. du Pont de Nemours and Company (DuPont) concerning the contamination of numerous public and private drinking water supplies with Perfluorooctanoic acid (PFOA), in the vicinity of the Washington Works facility located in Parkersburg, West Virginia. PFOA is a processing aid used in the manufacture of Teflon. PFOA had been released from the facility and leached into the ground water serving the water supplies in areas of West Virginia and Ohio. In February of 2015, The Chemours Company (Chemours) was formed as a wholly-owned subsidiary of DuPont. It is EPA's understanding that, at that time, Chemours took over ownership and operation of the Washington Works facility. Shortly thereafter, in July of 2015, Chemours became an independent publicly-traded company. In January of 2017, EPA, DuPont and Chemours amended a 2009 Safe Drinking Water Action Section 1431 Consent Order with DuPont to, among other things, add Chemours as a respondent and require both DuPont and Chemours to preliminarily provide temporary alternative drinking water to users of drinking water systems contaminated with PFOA concentrations exceeding 70 parts per trillion (ppt), and subsequently to treat and monitor those affected drinking water systems.

According to DuPont and Chemours, in 2013, DuPont discontinued the use and discharge of PFOA at the Washington Works facility. EPA understands that DuPont and Chemours replaced PFOA with the compound GenX, which is manufactured at the Chemours facility in Fayetteville, North Carolina. Over the past few years, the compound GenX has been identified by EPA and the North Carolina Department of Environmental Quality in the Cape Fear River, several water supplies downstream from that facility, and in groundwater wells at and around the Fayetteville facility. Chemours is currently providing bottled water to residential well owners in the vicinity of the Fayetteville facility whose drinking water samples showed levels of GenX above North Carolina's health goal of 140 ppt. EPA is concerned that drinking water wells in the vicinity of the Washington Works facility may similarly be contaminated by GenX. This concern is based in part upon the fact that

GenX has been detected in three on-site production wells and one on-site drinking water well, at the Washington Works facility.

EPA requests that Chemours sample a select group of public and private drinking water supplies for GenX in the vicinity of the Washington Works facility. The water supplies on the enclosed list were chosen by EPA based upon their historically high concentrations of PFOA. It is likely that these same wells would be impacted by GenX based upon the common methods of dispersal. Each of the selected water supplies is currently being treated with granulated activated carbon for PFOA removal. Chemours should collect GenX samples from both the raw (untreated) and the finished (treated) water in order to determine whether GenX is present, and if so, in what concentrations, as well as to determine the GAC treatment system's ability to remove GenX. Please initiate GenX testing in the next round of regularly scheduled monitoring for the identified drinking water systems, but no later than March 31, 2018. Thank you for your cooperation in this matter. If you have any questions, please contact Roger Reinhart or Jennifer Wilson at 215-814-5462 and 312-353-3115, respectively.

Sincerely,

Kate McManus, Acting Director
Water Protection Division

Enclosure

Cc: Bradley Aulick, Esq. The Chemours Company