



December 14, 2021

Michael S. Regan, Administrator
Environmental Protection Agency
Mail Code 1101A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Administrator Regan:

As representatives of City of Wilmington, New Hanover County, and Cape Fear Public Utility Authority (CFPUA) in North Carolina, we are writing on behalf of our residents and customers in support of a petition requesting that the Environmental Protection Agency (EPA) require Chemours to fund health and environmental effects testing on certain PFAS compounds tied to Chemours' operations at its plant near Fayetteville, North Carolina.

The petition from Center for Environmental Health, Cape Fear River Watch, Clean Cape Fear, Democracy Green, the NC Black Alliance, and Toxic Free NC was originally submitted October 14, 2020. Although it was denied by EPA in January 2021, your agency indicated in a September 16, 2021, letter that EPA will reconsider the petition and provide a response within 90 days.

Our community learned in 2017 that Chemours and its predecessor DuPont have for 40 years been releasing GenX and other PFAS from their plant into the environment, including into the Cape Fear River, the primary source of drinking water for more than 200,000 people in New Hanover County alone.

Today, more than four years of actions by state regulators to force Chemours to reduce its PFAS releases and mitigate the damages they have caused, Chemours' PFAS continues to be detected in the Cape Fear River. Moreover, the N.C. Department of Environmental Quality on November 3, 2021, determined that Chemours also is responsible for PFAS in New Hanover County groundwater.

So far, residents of Wilmington and New Hanover County have been left to shoulder burdens posed by Chemours' pollution. CFPUA, which provides drinking water to the vast majority of our residents, has nearly completed construction of new Granular Activated Carbon filters to treat Chemours' PFAS, a project whose \$43 million costs are being borne by CFPUA ratepayers.

Thanks to recent work by the EPA to assess the toxicity of GenX – one of Chemours' best-known PFAS pollutants – we know this compound appears to pose more serious health risks than Chemours' has previously contended. Therefore, it makes sense to assess the other pollutants Chemours has and is releasing to provide as clear a picture as possible of their health risks, individually and in combination.

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We have long contended that the responsibility for addressing these burdens lies solely with Chemours. The petition under consideration proposes a path toward resolving the health and environmental uncertainties. Regardless of how this task is accomplished, we believe it is crucial to fill these data gaps and that EPA properly should require Chemours to fund independent work to gather the information needed to fill them.

We urge you to support the request in the October 2020 petition: Compel Chemours to take on the burden of assessing the risks its pollution presents to our residents and the environment.

Sincerely,



Mayor Saffo
City of Wilmington



Chair Olson-Boseman
New Hanover County



Wesley P. Corder
Chairman, CFPUA