

1. Chemours

- DEQ needs to require Chemours to aggressively address onsite groundwater - and stop any discharge into the Cape Fear River via groundwater [they claim the onsite groundwater pollution doesn't affect anyone so they can leave it]
- DEQ should re-assess the availability of connecting private well owners to public water supplies in light of recent testing and proposals in [Cumberland County](#) combined with the low success rate of filter installation.
- DEQ needs to require Chemours deal with unregulated air emissions including any fugitive emissions of other PFAS not run through the thermal oxidizer
- DEQ needs to require Chemours address all pathways of exposure for folks living around the Fayetteville works plant with a thorough cleanup even if they're on replacement water.
- It is unacceptable for Chemours to rely on purported ecological and health impact studies when (1) there has been a history of high contamination levels, (2) there are other significant sources of PFAS, (3) many of the PFAS have not been extensively studied and (4) the combination that folks downstream are exposed to has never been studied. They need to keep their contamination on site and clean it up.

2. This is bigger than just Chemours.

- The health of NC residents isn't threatened just by Chemours but by multiple sources of PFAS. Downstream communities need swift and protective action from state legislators and NCDEQ.
- DEQ needs to:
 1. Ban the discharge of PFAS as a class of toxic pollutants at the Industrial User level and the Publicly Owned Treatment Works.
 2. Require ongoing monitoring, disclosure, and limitations of PFAS in permits for all effluent, biosolids, and leachate.

3. There is no safe level of exposure for folks in the Cape Fear watershed.

Given that nearly everyone in the basin has been exposed to high levels of PFAS for years, there is no 'safe' level of exposure going forward. The traditional regulatory approach – setting a discharge limit based on lab studies that estimate a concentration that is safe for a lifetime exposure – won't work here, because so many people have already been exposed at far higher concentrations for such a long time. 'Health values' or 'Health guidelines' won't be protective in this context. DEQ needs to use its existing authorities to stop the discharges of PFAS throughout the watershed.

4. Vulnerable Communities

Currently, the burden of safety is on the individual homeowner to protect themselves and their family by installing and maintaining Reverse Osmosis water filters, which costs hundreds of dollars or purchasing bottled water - costly to them and the environment. . This leaves a vulnerable part of the population at risk. Downstream drinking water utilities have a responsibility to provide safe water to their customers, yet they have little funding to do so. PFAS contamination must be stopped at the source, rather than at the drinking water treatment level.