Sincerely,

Lawrence E. Culleen

Lawrence E. Culleen
+1 202.942.5477 Direct
Lawrence.Culleen@arnoldporter.com

January 4, 2021

Yvette T. Collazo Reyes
Director, Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
WJC Building - Mail Code 7401
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Recent TSCA Section 21 Petition

Dear Ms. Collazo:

We are submitting this correspondence and the enclosed materials on behalf of our client, The Chemours Company ("Chemours"). The enclosures provide additional information which we consider to be relevant and of assistance to the U.S. Environmental Protection Agency ("EPA" and "the Agency") as the Agency is preparing its response to a recently-received Petition submitted by a coalition of six organizations pursuant to Section 21 of the Toxic Substances Control Act ("TSCA"). The Petitioners are requesting EPA undertake a rulemaking or issue administrative orders under TSCA Section 4 to require Chemours to undertake certain health and environmental effects testing of 54 per- and polyfluoroalkyl substances allegedly produced at Chemours' Fayetteville Works facility. On the basis of the information provided, and for the many reasons set forth in detail in the enclosed materials, Chemours recommends the Agency deny the Petition.

Thank you for your timely consideration of this submission. If you have any questions, feel free to contact me directly.

Sincerely,

Lawrence E. Culleen

Enclosure

cc: Rick Keigwin, U.S. Environmental Protection Agency
Mark Hartman, U.S. Environmental Protection Agency
Tala R. Henry, U.S. Environmental Protection Agency
David S. Turk, U.S. Environmental Protection Agency
Daniel R. Ruedy, U.S. Environmental Protection Agency