

18 January 2022

Matt King, PE, Industrial Permitting Manager
Louisville Metro Air Pollution Control District (APCD)
701 West Ormsby Street
Louisville, KY 40203

RE: Draft Permit C-0062-0032-21-V for Chemours Louisville Works

Dear Mr. King,

Thank you for the opportunity to participate in APCD's review of the subject application.

The Louisville Climate Action Network (LCAN) includes 48 organizations—26 other non-profit organizations, 11 for-profit businesses, seven congregations and religious groups and four educational institutions—plus over 1,000 individuals, all committed to cutting carbon pollution through voluntary efforts and better public policies.

LCAN is eager to see Chemours' overdue elimination of its super-potent HFC-23 greenhouse-gas (GHG) emissions as soon as possible. However, ...

... given Rubbertown's many decades of environmental health injustices to its workers and neighbors, we also wanted to understand any ramifications on Chemours' volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions, e.g., the potential to emit (PTE) limits. To ensure we provided our membership with reliable information, we hired Dr. Ranajit "Ron" Sahu, Ph.D., an expert in air pollution engineering, to assist us with reviewing Chemours permit application and APCD's draft permit. His final assessment report is attached, and is appended with his *curriculum vitae*.

We expected to be challenged by complicated stoichiometry, mass balances and data tables. Instead, we were dumbfounded by the following troubling deficiencies:

1. **Transparency** is the basis of accountability, yet we could not check numerous assertions in Chemours' application due to undefined, unattributed and/or unreliable assumptions used in its calculations and models. LCAN was founded by educators, who require students to show their sources in term papers, science-project reports, etc. We believe APCD should hold its permittees to analogous standards.
2. **Verification** requirements seemingly are missing.

As detailed in Dr. Sahu’s report, verification should be encoded in the permit to answer the following key questions:

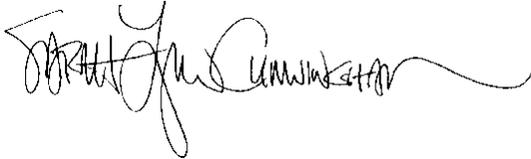
- a. Do the process modifications necessary to collect and separate Chemours’ flue gases—the HFC-23 greenhouse gas (GHG), a volatile organic carbon (VOC) compound and three hazardous air pollutants (HAPs)—justify treating the facility as an “area source”?
- b. Does the project lower all the health burdens Chemours places on Louisville?

The permit also should require Chemours to do whatever it takes to achieve both results if post-modification testing fails to verify *both* results. Further, Chemours should not be regulated as an “area source” unless and until it verifies its eligibility for reduced accountability responsibilities.

After all, Chemours (then DuPont) broke its 2015 promise to eliminate its HFC-23 emissions by 2018. DuPont has a long history of polluting Louisville and West Virginia. And while we believe the current Chemours plant manager is honorable, she could be reassigned elsewhere. Commitments based solely on trust are unacceptable and inappropriate.

In short, LCAAN asks Chemours and APCD to review our consultant’s report and address its concerns with transparency and verification requirements.

Cooperatively,

A handwritten signature in black ink, appearing to read "Sarah Lynn Cunningham", with a long, sweeping flourish extending to the right.

Sarah Lynn Cunningham, PE,
Executive Director