

STATE OF NORTH CAROLINA  
BRUNSWICK COUNTY

IN THE GENERAL COURT OF JUSTICE  
FILED SUPERIOR COURT DIVISION  
23-CVS- 918

2023 JUN -7 P 2:37

VILLAGE OF BALD HEAD ISLAND,  
Plaintiff,

BRUNSWICK CO., C.S.C.

By \_\_\_\_\_

vs.

**COMPLAINT**

3M COMPANY (f/k/a Minnesota Mining and  
Manufacturing, Co.; ANGUS FIRE;  
AGC CHEMICAL AMERICAS, INC.; AGC  
INC. F/K/A ASAHI GLASS CO.;  
ARCHROMA MANAGEMENT LLC;  
ARCHROMA US, INC.; ARKEMA INC.;  
BASF CORPORATION; BUCKEYE FIRE  
PROTECTION CO.; CARRIER GLOBAL  
CORPORATION; CHEMDESIGN  
PRODUCTS, INC.; CHEMGUARD;  
CHEMICALS INC.; CHUBB FIRE, LTD.;  
CLARIANT CORP.; CORTEVA, INC.;  
DEEPWATER CHEMICALS, INC.; DOE  
DEFENDANTS, JOHN 1-49; DUPONT DE  
NEMOURS, INC.; DYNAX CORP.; E.I. DU  
PONT DE NEMOURS & COMPANY;  
KIDDE-FENWAL, INC.; KIDDE PLC INC.;  
NATIONAL FOAM, INC.; NATION FORD  
CHEMICAL COMPANY; RAYTHEON  
TECHNOLOGIES CORPORATION F/K/A  
UNITED TECHNOLOGIES  
CORPORATION; THE ANSUL COMPANY;  
THE CHEMOURS COMPANY; THE  
CHEMOURS COMPANY FC, LLC; TYCO  
FIRE PRODUCTS, LP; AND UTC FIRE &  
SECURITY AMERICAS CORPORATION,

Defendants.

**COMPLAINT**

Plaintiff Village of Bald Head Island, North Carolina (hereafter "Village" or "Plaintiff"),  
by and through its undersigned counsel, brings this action against Defendants 3M Company,

E. I. DuPont De Nemours and Company, The Chemours Company, The Chemours Company, FC, LLC, Chemguard, Inc., Tyco Fire Products, LP, Ansul Company, Kidde-Fenwal, Inc., National Foam Inc., Angus Fire Armour Corporation, Buckeye Fire Equipment Company, AGC Chemical Americas, Inc., AGC Inc. f/k/a Asahi Glass Co., Archroma Management LLC, Archroma US, Inc. Arkema Inc., BASF Corporation, Carrier Global Corporation, ChemDesign Products, Inc., Chemicals Inc., Chubb Fire, LTD., Clariant Corp., Corteva, Inc., Deepwater Chemicals, Inc., DuPont De Nemours, Inc., Dynax Corp., Kidde PLC Inc., Nation Ford Chemical Company, Raytheon Technologies Corporation f/k/a United Technologies Corporation, UTC Fire & Security Americas Corporation, and John Doe Defendants 1-49 (collectively, “Defendants”). Plaintiff, based on information, belief and investigation of Counsel, alleges as follows:

#### **I. SUMMARY OF THE CASE**

1. Plaintiff brings this action against Defendants to recover the considerable costs and damages that it has incurred, or may incur, as a result of the presence of toxic compounds, identified as per- and polyfluoroalkyl substances (“PFAS”), in Plaintiff’s public water supply.

2. Plaintiff draws water from 16 groundwater wells to provide drinking water to residential, commercial, business, and municipal customers. In addition, Plaintiff buys water from Brunswick County, as needed.

3. Plaintiff’s water supply is currently contaminated with highly toxic PFAS compounds, including perfluorooctanoic acid (“PFOA”) and perfluorooctane sulfonate (“PFOS”). PFOA and PFOS have long been manufactured as components for aqueous film-forming foam (“AFFF”)—a product used to control and extinguish aviation, marine, fuel, and other shallow spill fires.