

- b. Does that assertion not imply that since impacts to wetlands onsite are unavoidable also onsite wetlands are connected by existing flow ways to downstream wetland systems and on to the Santa Fe River Basin, that mining will affect the Santa Fe River Basin?
- c. Given that the Santa Fe River system is an Outstanding Florida Water, how can such unavoidable harm be permitted under the requirement to prove no harm to an Outstanding Florida Water?

2. Radium exceedance and lack of reporting

- a. What will USACE specifically require of CHEMOURS to prevent radium exceedances and lack of reporting such as documented by FDEP in 2018? See FDEP Warning Letter No. WL18-40 to CHEMOURS on March 23, 2018. A copy is attached. Here are a few excerpts: “Radium and hardness samples were not properly preserved.” “Deficiency: Chain of Custody documents were available and reviewed. Based on the review Radium and Hardness samples were not being properly preserved with HN03.” “Observation: The facility is under a consent order (CO 16-1402) for Radium 226+228 and Gross Alpha exceedances, should be “report only” (interim limit) upon effective date of CO.”

3. Repeated unauthorized discharge of process water by Chemours

- a. What has USACE done to determine that CHEMOURS has adequate plans to prevent the kinds of unauthorized discharges of process water that it has had in the past?
 - i. Specifically, what plan from CHEMOURS has USACE determined will prevent unauthorized discharges such as CHEMOURS had from its wastewater ponds in each of the years 2022, 2023, 2024, and 2025, of more than 100,000 gallons per year? See the letter from the Florida Department of Environmental Protection (FDEP) to CHEMOURS of March 25, 2025, Re: Warning Letter No. WL25-092, Florida Mine – Trail Ridge South, Facility ID No. FL0A00014, Environmental Resource Permit MMR_137482-018, Unauthorized discharge, SWO# 2025-1502, Clay and Bradford Counties. A copy is attached.
 - ii. What verification will USACE require of CHEMOURS that any such unauthorized discharges do not affect wetlands or streams downstream? For example, what additional water quality samples will USACE require CHEMOURS to take outside its state-permitted footprint to verify assertions such as this one, “Chemours’ Response — Chemours’ correspondence to the Department on February 20, 2025, indicated that sedimentation remained within the permitted footprint of the ERP and did not