

Chemours' Comment

Please note:

- SWO# 2025-1502 – the release was on February 16, 2025, not February 17, 2025.
- SWO# 2023-1701 – Pond 1 is stormwater Pond 1 associated with the Plant facility, not to be confused with IWW Pond 1.

During the inspection, Department personnel noted the following:

1. Sediment deposition was observed into an adjacent wetland. Specific Condition 9 of the Environmental Resource Permit MMR\_137482-018 (ERP) requires that best management practices for turbidity and erosion control shall be implemented and maintained to prevent siltation and turbid discharges outside of the disturbance area. The ERP does not authorize dredging or filling of wetlands or other surface waters outside the approved area of disturbance.

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 enter the undisturbed wetlands. Accordingly, we would like to discuss with the Department the above comment.

2. Improperly installed silt fencing was observed outside the area of discharge, indicating the best management practices are not being maintained as required by Specific Condition 9 of the ERP.

Chemours' Comment – No comment.

3. The stormwater treatment system should be managed such that a 15-year, 24-hour storm event can be contained with appropriate freeboard as required by Specific Condition 10 of the ERP. The berms observed onsite did not appear to be constructed as required by Specific Condition 10 of the ERP.

Chemours' Comment – No comment.

Chemours respectfully requests a meeting with the Department to discuss the warning letter. Should you have any questions regarding the responses above, please do not hesitate to contact me.

Sincerely,



Connie Henderson  
Environnemental Manager

CC: Chris Suarez  
Herschel Vinyard