



The Chemours Company FC LLC  
Titanium Technologies Florida Plant  
5222 Treat Road, PO Box 753  
Starke FL 32091

February 5, 2024

Mr. Chris Suarez  
Mining and Mitigation Program  
2600 Blair Stone Road, MS 3577  
Tallahassee, FL 32399-2400

Via Email: [chris.suarez@floridaDEP.gov](mailto:chris.suarez@floridaDEP.gov)  
[Herndon.sims@floridaDEP.gov](mailto:Herndon.sims@floridaDEP.gov)

RE: The Chemours Company FC LLC  
Trail Ridge South Release  
Incident No. 2024-0997

Dear Mr. Suarez and Mr. Sims:

The following provides additional information pertaining to the discharge of water from the Trail Ridge South facility on January 31, 2024.

Chemours initially notified the following entities of the release on January 31, 2024:

- State Warning Point – ID 2024-0997
- Public Notice of Pollution - 22971
- Department of Environmental Protection – Mining and Mitigation Program and Industrial Wastewater Section

#### Summary of Incident

As discussed with our original notification, cells are in various phases of mining activity (clearing, mining, tailing and reclamation). Reclamation is ongoing in the northwest corner of the mining boundary. A portion of the reclamation cell remains bermed (northern perimeter and portion of western perimeter). Topsoil was being returned in the southern portion of the reclamation cell. At 6:20 am, operators noticed water on the topsoiled area and also water flowing over the northwest berm. Operators immediately constructed a berm to contain the water from the topsoiled area and built up the northwest corner of the remaining berm. Supervision was notified and the operations were shut down. Review of the area for source of water indicated a "washout" by the active tailings line which caused water to flow back toward the reclamation cell. From the topsoiled area, water left the site at an historic fire break and water from the northwest corner of the reclamation cell entered the adjacent offsite wetland. The water did not contain humate and there was not any breach of the reclamation cell structure. There was no deposition of sediment in the wetland.

#### Immediate actions taken upon discovery

- Area bermed
- Operations shut down

- Supervision and Environmental notified
- Rain pump in cell started to reduce water levels
- Environmental Assessment of release area
- Silt fence repair

Refer to Exhibit A which provides a graphic of the area where water was released and the sampling locations. Additionally Exhibit B provides photo representation of the reclamation cell, Area 1 and Area 2 sampling locations, and perimeter sampling locations.

#### Estimate of volume of water released

Upon the Department's request for volume released, a worst case scenario was provided to the Department on February 1, 2024. This estimate was based on pipe flow calculations over time. The operational area was inspected at 3:00 am indicated no issues and from the 6:20 am discovery of the water release from the site. Calculation:

Average Flow:	4,182	gpm
Total Minutes:	200	min
<b>Total Volume:</b>	<b>836,323</b>	<b>gal</b>

As discussed in our February 1 email, additional survey data was being conducted as some water was retained onsite within the northwest corner berm (Exhibit B).

- Total tailing pipe volume during event = **836,323 gal**
- Total volume contained within mine boundary = **642,128 gal**
- **Total volume released = 194,195 gal**

#### Environmental Review

Water went offsite in two (2) areas; referred to as Area 1 (northwest corner of reclamation cell) and Area 2 (topsoiled portion of reclamation cell).

##### Area 1

Area 1 is located along the northern and portion of the western boundary of the reclamation cell. This is a mixed forested wetland system. There was little to no flow within the area around the reclamation cell at the time of review. Water had accumulated within and around the hummocks in the wetland. Water depths were approximately 3-6 inches throughout the area reviewed. Observations within the wetland showed some areas of "cloudy" water and areas of clear water.

Water samples taken on the morning of January 31, were at the point of entry and within the surrounding area (Sample Location Map) between 8:30 am and 11:00 am. Samples taken in Area



1 include Sample 2, 3, 4 and 5. Sample 1 had no flow at the time of sampling and the nephelometric turbidity unit (NTU) was 57. The highest NTU was 77 at Sample location 3.

Four perimeter sample locations were identified, Samples 9, 10, 11 and 12, to monitor upstream flow from the wetland. Samples 9 and 10 were in the flow path. Samples 11 and 12 were south of the flow pattern.

Water samples were taken at the Sample 1 location in the PM on January 31 and on February 1, though there was no flow. The location dried so no additional samples were taken. Sample locations 2, 3, 4, 5 were not sampled after the initial sample as the majority of the water had soaked into the ground and there was either no water or very little ponded water.

Samples continued to be taken two times per day from January 31, 2024 – February 4, 2024 at the perimeter locations; Sample 9 and 10. One sample was taken February 5, 2024.

#### Area 2

The water that flowed over the topsoil returned area exited the site within a fire break that borders the wetland. Three samples were taken at this point (Samples 6, 7 and 8). No additional samples were taken as the water was evaporating and soaking into the ground.

**Table 1: Sampling Data (NTU)**

Sample Location		Area 1					Area 2			Perimeter			
		1	2	3	4	5	6	7	8	9	10	11	12
	1/31/2024 AM	57.1	22.6	76.9	25.6	53.3	46.2	70.0	31.7	7.5	8.0	4.7	5.8
	1/31/2024 PM	52.7	NS	NS	NS	NS	NS	NS	NS	5.7	5.8	NS	NS
	2/1/2024 AM	55.7	NS	NS	NS	NS	NS	NS	NS	7.6	7.6	NS	NS
	2/1/2024 PM	Dry	NS	NS	NS	NS	NS	NS	NS	7.6	13.4	NS	NS
	2/2/2024 AM	Dry	NS	NS	NS	NS	NS	NS	NS	5.8	15.0	NS	NS
	2/2/2024 PM	Dry	NS	NS	NS	NS	NS	NS	NS	7.3	14.5	NS	NS
	2/3/2024 AM	Dry	NS	NS	NS	NS	NS	NS	NS	6.4	11.8	NS	NS
	2/3/2024 PM	Dry	NS	NS	NS	NS	NS	NS	NS	5.4	7.6	NS	NS
	2/4/2024 AM	RW	NS	NS	NS	NS	NS	NS	NS	5.7	6.2	NS	NS
	2/4/2023 PM	RW	NS	NS	NS	NS	NS	NS	NS	6.1	7.0	NS	NS
	2/5/2024 AM	RW	NS	NS	NS	NS	NS	NS	NS	7.2	6.5	NS	NS
NS	No Sample												
RW	Rainwater												

#### Summary

A release of water from the active mining area over a reclamation cell occurred on January 31, 2024. The volume of release was estimated at approximately 194,195 gallons. The highest turbidity reading was 77 NTU within the Area 1 location immediately after the release. There was little to no flow in Area 1 subsequent to the initial event, so samples were not taken at locations 2, 3, 4 and 5. Water flow over the topsoiled area (Area 2) water exited within a fire break adjacent to a wetland. Sampling was conducted immediately after the event with the highest reading about 60 feet from the topsoiled area,

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measuring a 70.0 NTU. By the PM sampling event the water within Area 2 had soaked into the ground, so no additional sampling was conducted.

The perimeter sampling locations 9 and 10 were sampled through the morning of February 5, 2024. Turbidity within location 10 experienced an increase to 13.4 NTU on February 1, 2024 during the pm sampling event. This station increased to a 15 NTU on the morning of February 2, 2024 and decreased on subsequent sampling events. As indicated previously, there was no sediment deposition within the offsite wetlands.

Should you have any questions regarding the attached, please do not hesitate to contact me at us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Connie Henderson", written in black ink.

Connie Henderson  
Environmental Manager



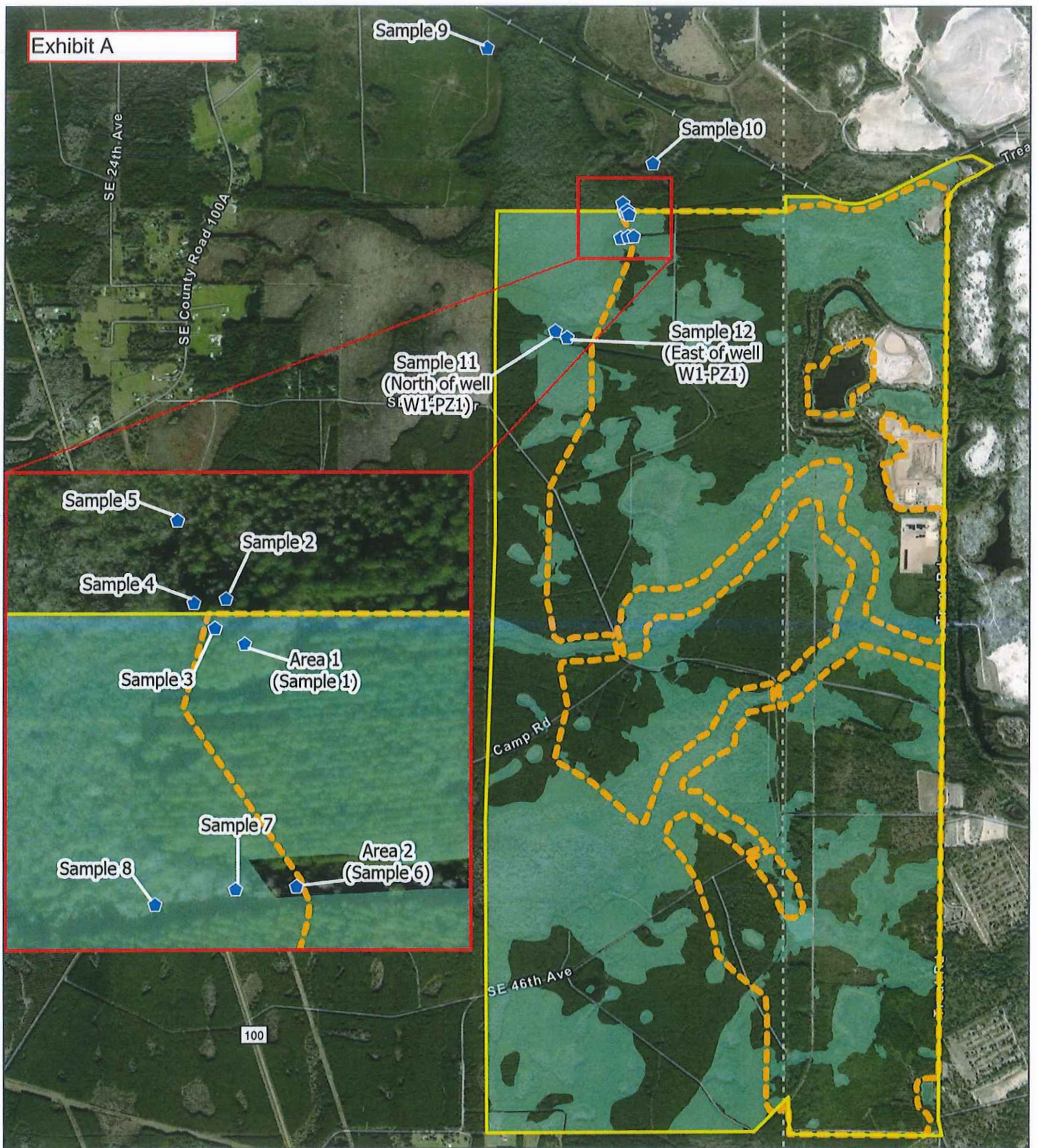


Exhibit A

Sample 9

Sample 10

Sample 11  
(North of well  
W1-PZ1)

Sample 12  
(East of well  
W1-PZ1)

Sample 5

Sample 2

Sample 4

Sample 3

Area 1  
(Sample 1)

Sample 7

Area 2  
(Sample 6)

Sample 8

Camp Rd

SE 46th Ave

100

## Legend

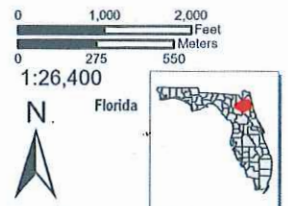
- Property Boundary
- Limit of Disturbance
- Wetlands
- ◆ Trail Ridge Sample Locations

**Sample Location Map**  
**86890 Trail Ridge South General Assistance**

**The Chemours Company, FC, LLC**  
**(82.0506411°W, 29.8901015°N)**

\*\*Received @ DEP-MMP 2/5/24\*\*

Date: February 2024  
Base map provided by ESRI. Property boundaries based PDF provided by the client. Locations collected by GPS.



**SWCA**  
ENVIRONMENTAL CONSULTANTS



**Exhibit B – Photo-documentation**

**Northwest corner Reclamation cell  
(January 31, 2024)**



**Northwest Corner Reclamation cell – Where water entered wetland  
(January 31, 2024)**



Representation of Wetland  
Sample 5 (January 31, 2024)



Northwest corner Reclamation Cell  
Representation of wetland (February 1, 2024)

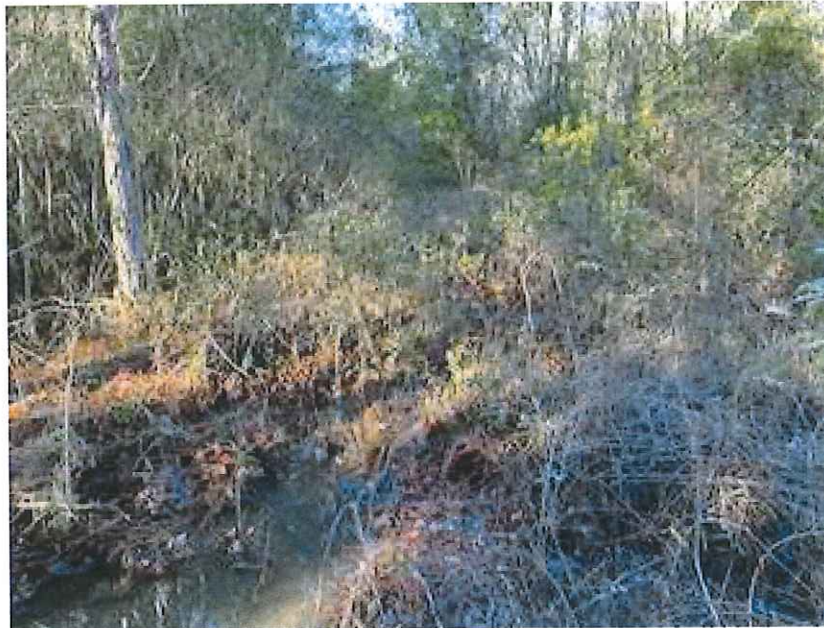




Area 2  
Water on Topsoil return area (January 31, 2024)



Firebreak  
(January 31, 2024)





Perimeter Sample Location 9 (January 31, 2024)



Perimeter Sample Location 10 (January 31, 2024)



Silt Fence Repaired (January 31, 2024)

