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To: [Watkins, Ian](#)
Cc: [Suarez, Chris](#); herschel.vinyard@arlaw.com; [Sims, Herndon](#)
Subject: Response to Warning Letter
Date: Thursday, April 10, 2025 4:39:43 PM
Attachments: [WL25-092 Response+Chemours.pdf](#)

EXTERNAL MESSAGE

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Please see our response to the warning letter. We would like to schedule a meeting to discuss.

thanks

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Titanium Technologies Florida Plant
5222 Treat Road, PO Box 753
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April 10, 2025

Mr. Ian Watkins
Florida Department of Environmental Protection
8800 Bay Meadows Way West
Jacksonville, FL 32256

Via Email : ian.watkins@FloridaDEP.gov

RE: Chemours - Trail Ridge South Release
Warning Letter No. WL25-092

Dear Mr. Watkins:

The Chemours Company FC, LLC (Chemours) received the warning letter dated March 25, 2025. Chemours takes the incidents documented in the warning letter seriously and will cooperate fully with the Department as it works to complete its investigation. Chemours provides the responses below to the incidents detailed in the letter and respectfully requests a meeting with the Department to discuss the warning letter.

The following table was provided by the Department

Table 1 Wastewater Spills – Trail Ridge South Mine

Date	SWO#	Volume	Description
2/17/2025	2025-1502	230,000 gallons	An overflow of process water occurred at cell B-01 at the Trail Ridge South plant, to an adjacent wetland. Sampling results at the point of release indicated turbidity of 45.1 NTU. An earthen berm <u>was constructed</u> to block flow, and process water was pumped to the nearby Trail Ridge facility.
9/16/2024	2024-7995	<u>1,200 gallons</u>	On Saturday September 14, 2024, at approximately 11:00 a.m., an operator noticed accumulated stormwater in a tailings pit overtopping a berm with some water to the adjacent wetland.
7/29/2024	2024-6237	<u>30,000 gallons</u>	A discharge end of pipe blew off of a pump and caused approximately 30,000 gallons of process water to discharge into a previously mined upland area and into wastewater pond 1. Water then flowed into industrial wastewater ponds 2 and 3, and then to outfall D-001.
1/31/2024	2024-997	194,195 gallons	Approximately 194,195 gallons discharged off the mine's boundary. Review indicated a "washout" by the active tailings line which caused water to flow back toward the reclamation cell. From the top soiled 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 system. Monitoring was conducted with the highest reading at 77 NTUs.
2/26/2023	2023-1701	228,000 gallons	Approximately 228,000 gallons discharge from Pond 1. The facility experienced a plant upset that exceeded the plant's containment area. Water entered a stormwater pond and adjacent ditch system. An alum system was placed at the ditch to settle out solids. No sampling was initiated with the water being contained in the ditch system.
12/26/2022	2022-10599	510,000 gallons	Discharge of approximately 510,000 gallons. Water overflowed the concrete containment and entered the stormwater pond. It is estimated that water discharged from the stormwater pond for approximately four (4) hours. Water entered the adjacent historic ditch. Monitoring revealed turbidity readings in the ditch system up to 104 NTUs and below 10 NTUs offsite.

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