INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Production Recertification Summary Audit Report

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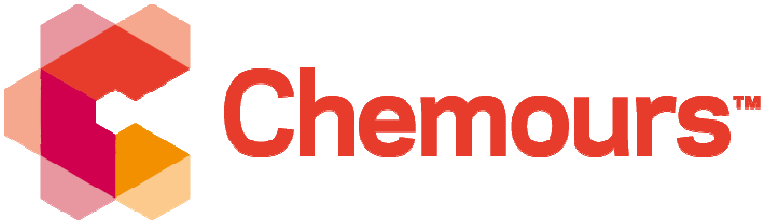

Hermosillo Facility

To The

October 2016 Cyanide Production Verification Protocol

By

Environmental Technology & Management

2323 Clear Lake City Boulevard, Suite 180-237, Houston, TX 77062-8032 (281) 480-8019

SUMMARY AUDIT REPORT

Name of Cyanide Production Facility: **Chemours, Inc. Hermosillo Facility**

Name of Facility Owner: **Chemours, Inc.**

Name of Facility Operator: **Chemours, Inc.**

Name of Responsible Manager: **Marcos Cervantes, Cyanides Business Mexico Operations Leader**

Address: **Carretera a la Colorada, Parque Industrial Dynatech Sur., Avenida Fusion Final, Ciudad Industrial, Sonora CP 89293**

City: **Hermosillo** State/Province: **Sonora** Country: **Mexico**

Telephone: **(444) 824-52-65**

Location detail and description of operations:

On February 9-10, 2017 Environmental Technology & Management conducted an audit of Chemours Hermosillo Facility's cyanide warehousing, repackaging and shipping activities against the Production Practices of the International Cyanide Management Code. Verification activities were performed at the request of Chemours, Inc., the Consignor Signatory to the Code. Chemours manufactures sodium cyanide briquettes at its production facility near Memphis, TN, filling metal Flo-bins with product or sending it to the nearby LSI facility, where it is loaded into Bag-boxes and Ecopaks. The Hermosillo Facility receives sodium cyanide in all three types of packaging via rail (box car) and truck. Once there, packaged product may be warehoused only, or trans-loaded into ISO Tanks, before being trucked to customer locations throughout northwestern Mexico. The rail transporter, Ferromex, the in-bound truck transporter, ALR, and the out-bound truck transporter, Segutal, are being re-verified for Code compliance as part of the Chemours Mexico Supply Chain. Segutal uses the facility as a dispatch terminal for its Western Mexico operations.

The Chemours (then DuPont) Hermosillo operation was commissioned in 2006 at a different location. The warehouse activities were first certified to the ICMI Cyanide Code Transportation Protocol as part of the DuPont Mexico Supply Chain audit in 2010. In 2011 operations in Hermosillo were expanded to include a Package-to-ISO Tank trans-loading system and moved to a rail yard/intermodal facility owned and operated by Intermodal Mexico (IMEX). Because of the addition of this repackaging/trans-loading operation, the Hermosillo Facility was certified to the ICMI Production Code in 2013.

The facility was specifically designed by DuPont engineers, constructed to DuPont specifications and in alignment with ICMI Cyanide Code requirements. Packaged cyanide is stored in a covered, well ventilated warehouse prior to being dispatched to customers by truck. Facility safety features include interlocks on the packaging lift mechanism and trailer securement at the warehouse loading dock. Processes to prevent release of trace sodium cyanide to the environment include a waste-water collection and evaporator system and footwear decontamination. Site security is in conformance with C-TPAT (BASC) guidelines for fence height and lighting, with guards around-the-clock.

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Chemours manages operations directly with its own leadership personnel at Hermosillo and a sister facility at San Luis Potosi (See separate report). Operators and supervisory personnel are employees of Intermodal Mexico (IMEX). Chemours has provided cyanide awareness and emergency response training to the Chemours, IMEX and Segutal (truck drivers) personnel at the facility. Chemours manages emergency response for the entire Mexico Supply Chain using the Chemours Global Emergency Response Plan and is supported by a full set of operating, maintenance and safety procedures that address all applicable requirements in the ICMI Production Protocol.

Cyanide unloading, warehousing, truck loading, and ISO Tank loading operations are covered within the scope of this report. The Hermosillo Facility audit was conducted at the same time as the rest of the Chemours Mexico Supply Chain. The other parts of the supply chain (rail and trucking carriers) are addressed in the Chemours Mexico Supply Chain certification audit report. The San Luis Potosi Facility, also audited to the ICMI Production Protocol, is addressed in a third report.

Audit Company: **Environmental Technology & Management**
Audit Team Leader: **John B. (Jack) McVaugh, PE, RCMS/EMS-LA**
E-mail: **jbkm.etm@att.net**
Names and Signatures of Other Auditors: **NA**
Date(s) of Audit: **February 9-10, 2017**

Chemours, Inc. Hermosillo		February 9-10, 2017
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SUMMARY AUDIT REPORT

Auditor's Finding

This operation is

- ☒ in full compliance
- ☐ in substantial compliance with the International Cyanide Management Production Code.
- ☐ not in compliance

Furthermore, the auditor verified that there have been no significant changes to processes, policies and procedures for the management of cyanide, no significant releases or exposures and no compliance issues over the past three years associated with this operation.

Audit Company: **Environmental Technology & Management**
Audit Team Leader: **John B. (Jack) McVaugh, PE, RCMS/EMS-LA**
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Names and Signatures of Other Auditors: **NA**
Date(s) of Audit: **February 9-10, 2017**

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Production Operations and using standard and accepted practices for health, safety and environmental audits.

Chemours, Inc. Hermosillo		Sept 1, 2017
Name of Facility	Signature of Lead Auditor	Date

Chemours, Inc. Hermosillo		February 9-10, 2017
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SUMMARY AUDIT REPORT

1. ***OPERATIONS:*** ***Design, construct and operate cyanide production facilities to prevent release of cyanide.***

Production Practice 1.1: ***Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 1.1. DuPont engineering worked with IMEX, the intermodal facility operator, to ensure quality control and quality assurance programs were implemented during construction of cyanide trans-loading and storage facilities. Documentation indicated that DuPont and IMEX personnel reviewed facility construction and provided documentation that the facility was built as proposed and approved. The Auditor confirmed that there have been no significant changes to the process or equipment within the last three years. "As-Built" drawings remain on file very well managed, readily retrievable. A Pre-Startup Safety Review was conducted by qualified persons to verify that when operated within established parameters the system will protect against cyanide exposures and releases. Plans show DuPont Engineering Standards being used, which means that materials of construction are compatible with the product and the transfer and repackaging processes used at the facility. The files include a "Hand-over" letter from a DuPont Chief Engineer, experienced in cyanide manufacture and handling, approving all aspects of the facility design and construction. Safety Interlocks are in place, but loss of power would not create a release. A power loss would only shut down any on-going transfer operations. All trans-loading and warehousing is conducted on concrete slabs minimize seepage to the subsurface. Procedures DHMO-11 Flobins to ISO Tanks and DHMO-16 Boxes & Ecopaks to ISO Tanks ensure against overfilling. Both procedures use Tally Sheets as tools in the process. Records were sampled to verify conformance to procedures over the past three years. Liquid products are not processed or stored at the facility. Therefore there are no process or storage tanks at the site. Warehouse floors have trenches around them to catch rain water in sumps. The trans-loading area is bermed with any storm water or ISO Tank exterior wash-down water collected in a sealed concrete trench and sump. The materials of construction provide a competent barrier to leakage and sumps are designed to hold the design storm event. As discussed later, trenches and sumps are inspected annually for integrity. All liquid collected in sumps is pumped to an evaporator on-site. There are no cyanide solution pipelines on site except for pipes from sumps to the evaporator, which may contain traces of cyanide. Warehouse and processing area trenches and sumps would serve as secondary containment.

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Production Practice 1.2: ***Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 1.2
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 1.2. Operating Procedures, Maintenance Procedures and Safety Procedures were reviewed. These procedures describe the standard practices necessary for safe and environmentally sound operation. Four procedures were identified dealing with contingencies during upsets in activities that could result in cyanide exposures or releases. These procedures are related to Spill Management, Brigade Management, Emergency Plan for Transportation and Emergency Plan for the Site. There have been no upsets in activities resulting in cyanide exposures or releases over the past three years. DHMS-15 Revision of Work Cycles calls for observations of work performed against procedures and makes controlled changes, i.e. changes are reviewed and signed-off by environmental and safety personnel. No significant procedural changes have taken place in the past three years. Preventive Maintenance procedures were identified and reviewed. Maintenance records on forklifts and cyanide trans-loading equipment were sampled which verified conformance with procedures over the last three years. There are no instruments for monitoring process, but personal HCN monitors are sent to the San Luis Potosi facility for calibration every 6 months, with calibration records kept. Each instrument performs a self-test daily when used to ensure it is working. Records were sampled to verify conformance with procedures over the last three years. Storm water and wash water that could possibly be contaminated with low levels of cyanide are collected in sumps which are pumped out to an on-site Water Evaporator. The trench and sump system with Water Evaporator ensure no unauthorized discharges get off the site. DHMM-04 Operation and Maintenance of the Water Evaporator covers the subject matter thoroughly, including periodic cleaning and disposition of residue. Inspection and maintenance records were sampled to verify conformance with procedures over the last three years. DHMM-04 requires any solid residue from the evaporator to be placed in the ISO Tank being filled and shipped to the mine. DHMO-17 Management of Residues covers collection and disposal of used Tyvek suits and other personal protective equipment, emptied Ecopaks, empty drums, corrugated and floor sweepings. **S**hipping and disposal manifests were sampled to verify conformance with procedures over the last three years. Packaged cyanide briquettes are stored in a well ventilated warehouse, within a secure site. The warehouse has a roof, but no walls, thus mitigating any hydrogen cyanide gas build-up. Cyanide packaging is designed to prevent water and moisture from contacting the product. Site security is in conformance with C-TPAT (BASC) guidelines for fence height and lighting, with 24/7 guards. Ecopaks, FloBins and ISO Tanks are the three types of packages dealt with, and Chemours product stewards in Memphis ensure packaging meets all international standards.

Production Practice 1.3: ***Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.***.

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The operation is ☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with Production Practice 1.3

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 1.3. There are no tanks onsite, but trenches and associated sumps provide containment for collected storm water and from rinsing the exteriors of ISO Tanks. Annual inspection for integrity of these containments is in place. A contractor drains all sumps, inspects their integrity, repairs any cracks and reseals the sump floors and walls. The evaporator and associated sump pumps, valves and piping are inspected weekly. Records verified that the container lift and forklifts were inspected daily, when used, and that the evaporator and associated sump pumps, valves and piping were inspected weekly. The frequency of these inspections is in accordance with Chemours and industry standards. The inspection records were observed to meet ICMC requirements. Deficiencies were noted on the inspection forms and corrective action was in evidence.

2. *WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.*

Production Practice 2.1: ***Develop and implement procedures to protect plant personnel from exposure to cyanide.***

The operation is ☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with Production Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 2.1. The Operating Procedures and Safety Procedures reviewed indicated that they focused on minimizing worker exposure during normal and abnormal conditions. Maintenance Procedures provide the same assurance to employees during maintenance activities. No process or operational changes have been proposed in the last 3 years. In the event of such proposed changes, the organization will be required to follow Management of Change Procedures under Chemours Corporate PSM Standard S-21A. Management of Change Procedures require review and sign-off, by environmental and safety personnel, of proposed process and operational changes and modifications for their potential impacts on worker health and safety, and incorporation of any identified protection measures. DHMS-15 Revision Work Cycles requires discussion with the worker being observed. The auditor reviewed the procedure & forms and verified that worker input was solicited. Personal HCN monitors were confirmed to have lower alarm set points at 4.7 parts per million (ppm) and higher alarm points at 10.0 ppm. Signage in the warehouse and trans-loading area, as well as procedures contained instructions on what to do if either point is detected. The auditor verified that personal HCN monitors were sent to the San Luis Potosi facility every 6 months for calibration. Records were complete from 2013 to present. Each instrument performs a self-test, daily when used, to ensure it is working. The

warehouses and trans-loading area have been identified as potentially detecting cyanide dust at more than 4.7 ppm. The auditor noted that signage was posted stating requirements for personal protective equipment (PPE) and that the requirements were being strictly observed. DHMS-16 the General Safety Procedure requires workers to utilize a private radio channel to assure communication with other personnel for assistance, help or aid when necessary and to utilize the Buddy System whenever possible. Operators at this location are IMEX employees, subject to IMEX health programs. These include audiometric tests, respirator fit tests and pulmonary fitness tests. IMEX health programs have been reviewed by Chemours and found acceptable. DHMS-16 the General Safety Procedure requires the use of Tyvek disposable coveralls and provides for decontamination of footwear before leaving the workplace. All these practices were being strictly observed on the site. Warning signs were observed around the warehouse and working areas with words and pictograms for PPE requirements. Procedures and signage in the warehouse and working areas were observed to prohibit smoking, eating, drinking and having open flames in these areas.

Production Practice 2.2: ***Develop and implement plans and procedures for rapid and effective response to cyanide exposure.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 2.2
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 2.2. Several specific documented emergency response procedures were reviewed as part of this audit. Eyewashes and safety showers are located together in key areas of the site. Two procedures cover inspections of these. All inspection tags contained all appropriate dates and were identifiable and legible. A site-wide alarm system, radios and other means of emergency notification were verified. One medical emergency kit, for use by medical professionals, is stored in the Supervisor's office thus assuring that the cyanide antidote is maintained within prescribed temperatures. A first aid kit, including gauze, oxygen tank and respirator, is located with Emergency Response equipment. Records of monthly first aid equipment inspections were reviewed and deemed complete for the past three years. Inspection records indicate that first aid and emergency equipment is available when needed, it is stored and tested according to manufacturers' recommendations, and replaced before reaching its expiration date. A set of Material Safety Data Sheets and First Aid Procedures, in Spanish, are located in several key areas of the site including the room where the first aid kit is located. There are no storage tanks or process tanks containing cyanide on-site. Piping from the sumps to the evaporator was found to be appropriately labeled, including direction of flow. Cyanide containers are appropriately marked to alert workers to their contents. DHMS-16 the General Safety Procedure contains the organization's decontamination policy, including mandatory use of Tyvek disposable coveralls and requiring decontamination of shoes. The auditor noted these requirements being observed, and was required to decontaminate his footwear. All site personnel were trained on the use of the First Aid Kit and First Aid procedures. Records show annual First Aid and Emergency Response training taking place over the past three years. The Medical Emergency Kit is available if needed by paramedics and off-site

medical personnel. DHMS-22 Medical Emergency Treatment was developed to include procedures to transport exposed workers to locally available qualified off site medical facilities, using external transportation services. Records show that Chemours Product Stewards have conducted training for local hospitals and medical professionals. The training alerted local hospitals to the potential need to treat patients for cyanide exposure, and determined that they have adequate, qualified staff, equipment and expertise to respond to cyanide exposures. The Simulation Drill Schedule for 2016 showed at least one drill per month, simulating diverse emergency scenarios and including all site personnel. Drill records and critiques were found to be complete and well maintained, and verified that corrective action was taken on any observed deficiencies and recommendations in a timely manner. Although there have been no Cyanide exposure incidents, DHMS-20 describes investigation of such incidents and review of applicable emergency plans for efficacy after an incident.

3. ***MONITORING:*** ***Ensure that process controls are protective of the environment.***

Production Practice 3.1: ***Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 3.1
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 3.1 because there are no direct or indirect discharges of waste water from this facility to surface water. Since no direct or indirect discharge could reasonably be expected to reach surface water, there is no regulatory requirement for Chemours to monitor surface water. Furthermore, Chemours has no liquid cyanide products at this site. Although there is potential for minimally contaminated storm water and ISO Tank exterior wash down water to be collected on-site, Chemours designed and operates its facility to prevent its release to the environment, including ground water. Therefore, no regulatory body has set limits on cyanide species in groundwater at the facility nor required Chemours to conduct any monitoring of ground or surface waters. For these reasons and because there have been no spills of product, Chemours is not engaged in any remedial activity to prevent degradation of ground water. Lastly, because of the nature of operations on this site, warehousing and trans-loading of sodium cyanide briquettes, there are no process emissions of hydrogen cyanide gas from this facility. For the reasons stated above, monitoring is not conducted at any frequency to characterize any medium.

4. ***TRAINING: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.***

Production Practice 4.1: ***Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 4.1
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 4.1. A Training Matrix assures that training needs are identified, including training on cyanide hazards. Records show that training has been carried out including annual refresher training over the three year cycle. Training on proper personal protective equipment (PPE) is included with training on Operating Procedures. Signage in work areas is posted as a reminder of area-specific PPE requirements. The production facility trains workers to perform their normal production tasks with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases. Examples audited include the procedure for the use of forklifts and procedures for trans-loading. Procedures are used as training materials and cover all elements of each job. A list of personnel who train and approve new employees was reviewed. Only the employees most experienced on the specific tasks to be accomplished at the site provided the training. Records confirmed that all operators receive training before working with cyanide, and never work alone when performing cyanide trans-loading procedures. The auditor verified that tests follow training on each procedure to evaluate and ensure the effectiveness of cyanide training.

Production Practice 4.2: Train employees to respond to cyanide exposures and releases.

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 4.2
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 4.2. All operators and supervisors are trained on cyanide release response procedures annually including Management of Spills and the Emergency Response Plan. All operators and supervisors are trained on worker exposure procedures annually including Management of the Emergency Medical Kit for Exposure to NaCN and HCN and the Emergency Response Plan. Emergency Drill critiques reviewed include comments on the effectiveness of training and competence in emergency response. The Emergency Response Plan requires a review of applicable emergency response procedures after each drill and revision as necessary. Revision logs indicate amendments have been made over the last cycle. Training records meeting all protocol requirements were found to be complete dating back to when the plant and warehouse were commissioned in 2011.

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5. *EMERGENCY RESPONSE:* ***Protect communities and the environment through the development of emergency response strategies and capabilities.***

Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 5.1
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 5.1. Procedures have been developed and are maintained to address potential releases of cyanide that may occur on site or may otherwise require response. Procedures have been established and maintained addressing all applicable potential release scenarios listed in the protocol. Operations on the site do not generate or utilize hydrogen cyanide, do not include dissolution processes, and do not include ponds, pipes, valves, tanks and waste treatment facilities in cyanide service. DHMS-10 Methods for Inspection and Use of Fire Extinguishers addresses emergency response involving fires. In the unlikely event of any solid product briquette spills during trans-loading, procedures described in Production Process 5.1.3 (a-d) would be used to address such events. Trans-loading equipment components are interlocked, such that a power failure or equipment failure would stop all product transfer operations, with no potential for release of product to the environment or exposure to workers. DHMS-22 Emergency Plan and Accountability of Personnel addresses evacuation and headcount for site personnel. There are no residences within a range that could be affected by anticipated emergency situations, but an informal network exists to notify surrounding industries of an emergency situation which could affect them. DHMS-04Management of the Emergency Medical kit for Exposure to NaCN and HCN and DHMS-09 Emergency Treatment for Intoxication by HCN and NaCN address cyanide antidotes and first aid measures for cyanide exposure. DHMS-05 Management of Spills and DHMS-18 Use of Barricades address control of releases at the site. DHMS-05 Management of Spills and DHMS-20 Investigation of Incidents and Accidents within the Plant address containment, assessment, mitigation and future prevention of releases.

Production Practice 5.2: Involve site personnel and stakeholders in the planning process.

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 5.2
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 5.2. Evidence reviewed indicated that Chemours, Segutal and IMEX employees, security contractors, and neighboring industries were involved

in emergency planning. An assessment of off-site impacts showed that communities could not possibly be affected. Therefore, the practice of making communities, other than the medical community, aware of risks associated with cyanide releases, has not been found necessary. Records show that Chemours conducted training for local hospitals and medical professionals during this 3-year cycle. Civil Protection and regulatory agencies such as PROFEPA regularly visit the plant to review and comment on plans affecting safety and the environment. Evidence reviewed indicated that Chemours, Segutal and IMEX employees, security contractors, and neighboring industries engage in regular consultation or communication, by participation in emergency drills and safety meetings, to assure that the Plan addresses current conditions and risks.

Production Practice 5.3: ***Designate appropriate personnel and commit necessary equipment and resources for emergency response.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 5.3
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 5.3. DHMS-08 Organization of Brigades identifies the Emergency Response Team, designates primary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Plan and specifies the duties and responsibilities of the coordinators and team members. A Training Matrix and training records verified that emergency responder training requirements were fulfilled. DHMS-01 Emergency Procedures in Transportation includes call-out procedures and 24-hour contact information for the coordinators and response team members, lists all emergency response equipment and includes procedures to inspect this equipment. DHMS-04 Management of the Emergency Medical Kit for Exposure to NaCN and HCN describes the role of outside responders and medical facilities in emergency response procedures. Records show that Chemours conducted training for local hospitals and medical professionals during this three year cycle. At that time personnel were made aware of their duties and alerted to the availability of a medical emergency kit at the site. The site's Brigade personnel are trained and equipped to respond to on-site fire and release emergencies involving cyanide, thereby precluding the need to involve outside agencies in mock drills.

Production Practice 5.4: ***Develop procedures for internal and external emergency notification and reporting.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Production Practice 5.4
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 5.4. DHMS-01 Procedure for Transportation Emergencies includes procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of an emergency, as appropriate. The Chemours Crisis Management Manual includes procedures and contact information for notifying potentially affected communities of an incident and response measures and for communication with the media.

Production Practice 5.5: ***Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 5.5

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 5.5. DHMS-01 Procedure for Transportation Emergencies and DHMS-05 Management of Spills describe specific, appropriate remediation measures, as appropriate, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris, and provision of an alternate drinking water supply. Based on time-tested procedures developed by manufacturer and Code Signatory, Chemours (formerly DuPont), these procedures describe the treatment chemicals to be used and the preparation of proper concentrations. DHMO-07 Sampling and Analysis of Water/Mud from Clean-up of Spills addresses the monitoring to identify the extent and effects of a release, defines the end point of remediation, and includes sampling methodologies, parameters and locations.DHMS-01 also prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. DHMS-05 Management of Spills and DHMO-07 Elimination of Waste address the potential need for environmental monitoring to identify the extent and effects of a release, and include sampling methodologies, parameters and possible locations.

Production Practice 5.6: ***Periodically evaluate response procedures and capabilities and revise them as needed.***

The operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Production Practice 5.6

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 5.6. Chemours requires all its production sites to review their emergency plans no less than annually and evaluate their adequacy. The auditor verified annual review over the past three year cycle, with all deficiencies and recommendations addressed in a timely fashion. Records show that four emergency drills have been conducted each year in the last cycle and four have been scheduled for 2017. The auditor verified that each drill was critiqued, with all deficiencies and recommendations addressed in a timely fashion. Drill scenarios rotated between evacuation, fire, spill and medical emergencies, including exposure to cyanide release. DHMS-20 Investigation of Accidents and Incidents in the Plant requires review and evaluation of emergency response procedures after an emergency requiring implementation of those procedures. During the past three year cycle, no emergency response procedure has been implemented.

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