

***INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE***

**Cyanide Production Recertification
Summary Audit Report**

of



San Luis Potosi Facility

To The

October 2016 Cyanide Production Verification Protocol

By

Environmental Technology & Management

SUMMARY AUDIT REPORT

Name of Cyanide Production Facility: **Chemours, Inc. San Luis Potosi 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: **Eje 120 #500, Zona Industrial del Potosí,**
City: **San Luis Potosi** State/Province: **San Luis Potosi CP 78090** Country: **Mexico**
Telephone: **(444) 824-52-65 & (444) 824-52-63**

Location detail and description of operations:

On February 16-17, 2017 Environmental Technology & Management conducted an audit of Chemours San Luis Potosi 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., a Consignor Signatory to the Code. Chemours manufactures sodium cyanide briquettes at its production facility near Memphis, TN, filling rail hopper cars with product for shipping directly to its Mexican facilities, or sending it to the nearby LSI facility, where it is loaded into drums, Bag-boxes and Ecopaks. The San Luis Potosi Facility receives cyanide briquettes in hopper cars and in all three types of packaging via rail (box car) and truck. Once there, packaged product is warehoused before being trucked to customer locations throughout Eastern Mexico. Product received by rail is trans-loaded into Flo-bins or ISO Tanks. The rail transporter, KCSM, 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 (See separate report). Segutal uses the facility as a dispatch terminal for its Eastern Mexico operations.

The Chemours (then DuPont) San Luis Potosi facility was commissioned in 2006 as a warehouse operation, on a site owned and operated by Suministros Industriales Potosinos, S.A. De C.V. (S.I.P.). The warehouse activities were first certified to the ICMI Cyanide Transportation Protocol as part of the DuPont Mexico Supply Chain audit in 2010. In 2011 operations in San Luis Potosi were expanded to include the trans-loading system. Because of the addition of this trans-loading operation, the San Luis Potosi 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 covered, well ventilated warehouses prior to being dispatched to customers by truck. Facility safety features include interlocks on the trans-loading equipment and trailer securement at the warehouse loading docks. Processes to prevent trace releases of sodium cyanide to the environment include a dust collector interlocked with the trans-loading operation and footwear decontamination. Site security is in conformance with C-TPAT (BASC)

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guidelines for fence height and lighting, with guards around-the-clock. All operations are performed within this secure area.

Chemours manages operations directly with its own leadership team at the San Luis Potosi facility and at a sister facility, Hermosillo (See separate report). Operators and supervisory personnel are employees of Suministros Industriales Potosinos, S.A. De C.V. (S.I.P.). Chemours has provided cyanide awareness and emergency response training to the Chemours, SIP 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 facility operating, maintenance and safety procedures that address all applicable requirements in the ICMI Production Protocol.

Cyanide unloading, warehousing, truck loading, and ISO Tank/Flo-bin loading operations are covered within the scope of this report. The San Luis Potosi Facility audit was conducted simultaneously with the Chemours Mexico Supply Chain. The transportation companies interfacing with the San Luis Potosi facility (rail and truck carriers) are addressed in the Chemours Mexico Supply Chain certification audit report. The Hermosillo 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 16-17, 2017**

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Signature of Lead Auditor

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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**
 E-mail: **jbkm.etm@att.net**
 Names and Signatures of Other Auditors: **NA**
 Date(s) of Audit: **February 16-17, 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 Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

<u>Chemours, Inc. San Luis Potosi</u>		<u>Sept. 1, 2017</u>
Name of Facility	Signature of Lead Auditor	Date

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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 Production Practice 1.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 1.1. Phase 1, the warehouse went into operation in 2006. The facility to trans-load cyanide briquettes from hopper cars to Flo-Bins and ISO Tanks, Phase 2, had a 2009 start-up. DuPont engineering worked with SIP, the warehouse 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 SIP 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 between the retractable filling boot, dust collector and conveyor belt and also between diverter valve and FloBin fill station. A loss of power would not create a release but would only shut down any on-going transfer operations. All trans-loading and warehousing is conducted on concrete slabs thereby minimizing seepage to the subsurface. Procedures DSLO-16 Hopper Car to ISO Tanks and DSLO-11 Hopper Car to FloBins ensure against overfilling. Procedures are supported by ultra-sonic level sensors in the respective boots for FloBins and ISO Tanks, and the fact that FloBins are loaded on a scale. 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 out by a contractor and is trucked away for off-site disposal. No cyanide solution pipelines are located on site.



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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. DSLS-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 to verify conformance with procedures over the last three years. The only instruments for monitoring process parameters are the level sensors in ISO Tank filling and FloBin filling line boots. A procedure for cleaning and calibration of these sensors was reviewed, along with calibration records from the last three years. While not monitors of process parameters, personal HCN monitors are calibrated every 3 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 three sumps. These are pumped out and hauled off-site by a hazardous waste hauler permitted by SEMARNAT to a waste treatment provider also permitted by SEMARNAT. Waste water shipping and disposal manifests were sampled to verify conformance with procedures over the last three years. DSLO-04 Storage, management and disposition of hazardous waste covers collection and disposal of used Tyvek disposable suits and other personal protective equipment, emptied Ecopaks, empty drums, corrugated and floor sweepings. Shipping and disposal manifests were sampled to verify conformance with procedures over the last three years.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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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. There are no pumps or valves associated with the storm water trench/sump system. Any collected storm water is pumped out of sumps by a contractor. Records verified that the conveyor belt, dust collector, retractable boot, diverter valve and forklifts are inspected at the beginning of each shift in which they are used, which is an industry standard. The inspection records for the conveyor belt, dust collector, retractable boot, diverter valve and forklifts 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 Production Practice 2.1
 not in compliance with

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. DSLS-15 Revision of 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 and procedures contained instructions on what to do if either point is detected. The auditor verified that personal HCN monitors were calibrated every 3 months. 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. DSLS-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 SIP employees, subject to SIP health programs. These include audiometric tests, respirator fit tests and pulmonary fitness tests. SIP health programs have been reviewed



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by Chemours and found acceptable. DSLS-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. Smoking is not allowed within the fence-line at the San Luis Potosi facility.

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 three key areas. Procedures DSLS-10 and DSLS-14 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 Operations Leader's office thus assuring that the cyanide antidote is maintained within prescribed temperatures. Four first aid kits including oxygen tank and respirators are located in key areas. 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 the same areas of the site where first aid kits are located. There are no storage tanks, process tanks or piping containing cyanide on-site. Cyanide containers are appropriately marked to alert workers of their contents. DSLS-16 the General Safety Procedure contains the organization's decontamination policy, including requiring the 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 Kits 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. DSLS-04 Medical Emergency Treatment was developed to include procedures to transport exposed workers to locally available qualified off site medical facilities, using external transportation. Records show that Chemours last conducted training for local hospitals and medical professionals in September and November 2016. 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 to four drills per quarter, simulating diverse emergency scenarios and including all site personnel. Drill records and



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critiques were found to be complete and well maintained, and verified that corrective action was taken on any observed deficiencies and recommendations. Although there have been no Cyanide exposure incidents, DSLS-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 there is no indirect discharge of waste water from this facility to surface water, no indirect discharge could reasonably be expected to reach surface water and 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, and there is no regulatory requirement to monitor groundwater or surface water. 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

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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 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 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. DSLS-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 below 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. DSLS-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. DSLS-04 Management of the Emergency Medical kit for Exposure to NaCN and HCN and DSLS-09 Emergency Treatment for Intoxication by HCN and NaCN address cyanide antidotes and first aid measures for cyanide exposure. DSLS-05 Management of Spills and DSLS-18 Use of Barricades address control of releases at the site. DSLS-05 Management of Spills and DSLS-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, Segural and SIP 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

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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 SIP 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. DSLS-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. DSLS-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. DSLS-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 they 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:

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Chemours is in full compliance with Production Practice 5.4. DSLS-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 Production Practice 5.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Chemours is in full compliance with Production Practice 5.5. DSLS-01 Procedure for Transportation Emergencies and DSLS-05 Management of Spills describe specific, appropriate remediation measures, 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. DSLO-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. DSLS-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. DSLS-05 Management of Spills and DSLO-07 address the potential need for environmental monitoring to identify the extent and effects of a release.


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 Production Practice 5.6
 not in compliance with

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


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timely fashion. Records showed 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. DSLS-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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