



141 Township Avenue, Suite 304 Ridgeland, MS 39157 / P 662.840.5945 / trinityconsultants.com

October 17, 2025

Mrs. Carrie Barefoot, P.E.
Manager, 401/Stormwater Branch
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225

Re: Large Construction Notice of Intent and Storm Water Pollution Prevention Plan
Chemours Company FC LLC, Delisle Plant (Chemours)
7685 Kiln Delisle Road
Pass Christian, Mississippi (Harrison County)

Dear Mrs. Barefoot:

Chemours Company FC LLC, Delisle Plant (Chemours) retained the services of Trinity Consultants, Inc. (Trinity) to develop the Large Construction Notice of Intent (LCNOI) and Storm Water Pollution Prevention Plan (SWPPP) for the above-referenced facility. Chemours plans to clear, grub, grade, and construct a laydown area to assist with the construction of PCC within the existing Chemours site located at 7685 Kiln Delisle Road in Pass Christian, Harrison County, Mississippi. The laydown yard will be located approximately 0.25 miles northeast of the current Chemours property. The LCNOI and SWPPP for this project are attached.

If you have any questions concerning the LCNOI or SWPPP, please feel free to contact me at (662) 840-5945.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Deignan", written in a cursive style.

Jennifer Deignan
Consultant

Attachment I: Large Construction Notice of Intent (LCNOI)

Attachment II: Stormwater Pollution Prevention Plan (SWPPP)

HEADQUARTERS

12700 Park Central Dr, Ste 600, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

ATTACHMENT I
LARGE CONSTRUCTION NOTICE OF INTENT (LCNOI)

AI: 1832

MSR109702

Rec'd via email:
10/22/2025



MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY

LARGE CONSTRUCTION NOTICE OF INTENT (LCNOI) FOR COVERAGE UNDER THE LARGE CONSTRUCTION STORM WATER GENERAL NPDES PERMIT

INSTRUCTIONS

The Large Construction Notice of Intent (LCNOI) is for coverage under the Large Construction General Permit for land disturbing activities of five (5) acres or greater; or for land disturbing activities, which are part of a larger common plan of development or sale that are initially less than five (5) acres but will ultimately disturb five (5) or more acres. Applicant must be the owner or operator. For construction activities, the operator is typically the prime contractor. The owner(s) of the property and the prime contractor associated with regulated construction activity on the property have joint and severable responsibility for compliance with the Large Construction Storm Water General Permit MSR10.

If the company seeking coverage is a corporation, a limited liability company, a partnership, or a business trust, attach proof of its registration with the Mississippi Secretary of State and/or its Certificate of Good Standing. This registration or Certificate of Good Standing must be dated within twelve (12) months of the date of the submittal of this coverage form. Coverage will be issued in the company name as it is registered with the Mississippi Secretary of State.

Completed LCNOIs should be filed at least thirty (30) days prior to the commencement of construction. Discharge of storm water from large construction activities without written notification of coverage is a violation of state law.

Submittals with this LCNOI must include:

- A site-specific Storm Water Pollution Prevention Plan (SWPPP) developed in accordance with ACT5 of the General Permit
- A detailed site-specific scaled drawing showing the property layout and the features outlined in ACT5 of the General Permit
- A United States Geological Survey (USGS) quadrangle map or photocopy, extending at least one-half mile beyond the facility property boundaries with the site location and outfalls outlined or highlighted. The name of the quadrangle map must be shown on all copies. Quadrangle maps can be obtained from the MDEQ, Office of Geology at 601-961-5523.

Additional submittals may include the following, if applicable:

- Appropriate Section 404 documentation from U.S. Army Corps of Engineers
- Appropriate documentation concerning future disposal of sanitary sewage and sewage collection system construction
- Appropriate documentation from the MDEQ Office of Land & Water concerning dam construction and low flow requirements
- Approval from County Utility Authority in Hancock, Harrison, Jackson, Pearl River and Stone Counties
- Antidegradation report for disturbance within Waters of the State

ALL QUESTIONS MUST BE ANSWERED (Answer "NA" if the question is not applicable)

APPLICANT IS THE: ☒ OWNER ☐ PRIME CONTRACTOR

OWNER CONTACT INFORMATION

OWNER CONTACT PERSON: Robert Mills
OWNER COMPANY LEGAL NAME: Chemours Company FC LLC, Delisle Plant
OWNER STREET OR P.O. BOX: 7685 Kiln Delisle Road
OWNER CITY: Pass Christian STATE: Mississippi ZIP: 39571
OWNER PHONE #: () (228) 255-2264 OWNER EMAIL: robert.mills@chemours.com

PREPARER CONTACT INFORMATION

IF NOI WAS PREPARED BY SOMEONE OTHER THAN THE APPLICANT

CONTACT PERSON: Jennifer Deignan
COMPANY LEGAL NAME: Trinity Consultants, Inc.
STREET OR P.O. BOX: 141 Township Avenue Ste 304
CITY: Ridgeland STATE: Mississippi ZIP: 39157
PHONE # () (662) 840-5945 EMAIL: jennifer.deignan@trinityconsultants.com

PRIME CONTRACTOR CONTACT INFORMATION

PRIME CONTRACTOR CONTACT PERSON: TBD
PRIME CONTRACTOR COMPANY LEGAL NAME:
PRIME CONTRACTOR STREET OR P.O. BOX:
PRIME CONTRACTOR CITY: STATE: ZIP:
PRIME CONTRACTOR PHONE #: () PRIME CONTRACTOR EMAIL:

FACILITY SITE INFORMATION

FACILITY SITE NAME: Chemours Company FC LLC, Delisle Plant
FACILITY SITE ADDRESS (If the physical address is not available, please indicate the nearest named road. For linear projects indicate the beginning of the project and identify all counties the project traverses.)
STREET: Kiln Delisle Road
CITY: Pass Christian STATE: Mississippi COUNTY: Harrison ZIP: 39571
FACILITY SITE TRIBAL LAND ID (N/A If not applicable): N/A
LATITUDE: 30 degrees 23 minutes 19 seconds LONGITUDE: 89 degrees 18 minutes 26 seconds
LAT & LONG DATA SOURCE (GPS (Please GPS Project Entrance/Start Point) or Map Interpolation): Google Earth
TOTAL ACREAGE THAT WILL BE DISTURBED ¹: +/- 52.3

IS THIS PART OF A LARGER COMMON PLAN OF DEVELOPMENT? YES ☒ NO ☐

IF YES, NAME OF LARGER COMMON PLAN OF DEVELOPMENT: Construction of PCC GulfChem (not issued yet)
 AND PERMIT COVERAGE NUMBER: MSR109648

ESTIMATED CONSTRUCTION PROJECT START DATE: 01/01/2026
 YYYY-MM-DD

ESTIMATED CONSTRUCTION PROJECT END DATE: 06/30/2026
 YYYY-MM-DD

DESCRIPTION OF CONSTRUCTION ACTIVITY: Clearing, grubbing, grading, deposition of gravel for laydown area

PROPOSED DESCRIPTION OF PROPERTY USE AFTER CONSTRUCTION HAS BEEN COMPLETED:
Laydown area for construction of nearby chlorine manufacturing facility.

SIC Code: 2816 NAICS Code 352130

NEAREST NAMED RECEIVING STREAM: Saint Louis Bay

IS RECEIVING STREAM ON MISSISSIPPI'S 303(d) LIST OF IMPAIRED WATER BODIES? (The 303(d) list of impaired waters and TMDL stream segments may be found on MDEQ's web site: http://www.deq.state.ms.us/MDEQ.nsf/page/TWB_Total_Maximum_Daily_Load_Section) YES ☐ NO ☒

HAS A TMDL BEEN ESTABLISHED FOR THE RECEIVING STREAM SEGMENT? YES ☒ NO ☐

FOR WHICH POLLUTANT: Pathogens, Fecal Coliform

ARE THERE RECREATIONAL STREAMS, PRIVATE/PUBLIC PONDS OR LAKES WITHIN ½ MILE DOWNSTREAM OF PROJECT BOUNDARY THAT MAY BE IMPACTED BY THE CONSTRUCTION ACTIVITY? YES ☒ NO ☐

EXISTING DATA DESCRIBING THE SOIL (for linear projects please describe in SWPPP):
Poarch fine sandy loam (PoB), Saucier fine sandy loam (SfB) in areas not already developed.

WILL FLOCCULANTS BE USED TO TREAT TURBIDITY IN STORM WATER? YES ☐ NO ☒

IF YES, INDICATE THE TYPE OF FLOCCULANT. ☐ ANIONIC POLYACRYLAMIDE (PAM)
☐ OTHER _____

IF YES, DOES THE SWPPP DESCRIBE THE METHOD OF INTRODUCTION, THE LOCATION OF INTRODUCTION AND THE LOCATION OF WHERE FLOCCULATED MATERIAL WILL SETTLE?

IS A SDS SHEET INCLUDED FOR THE FLOCCULATE? YES ☐ NO ☐

WILL THERE BE A 50 FT BUFFER BETWEEN THE PROJECT DISTURBANCE AND THE WATERS OF THE STATE? YES ☒ NO ☐

IF NOT, PROVIDE EQUIVALENT CONTROL MEASURES IN THE SWPPP.

¹ Acreage for subdivision development includes areas disturbed by construction of roads, utilities and drainage. Additionally, a housesite of at least 10,000 ft² per lot (entire lot, if smaller) shall be included in calculating acreage disturbed.

DOCUMENTATION OF COMPLIANCE WITH OTHER REGULATIONS/REQUIREMENTS
COVERAGE UNDER THIS PERMIT WILL NOT BE GRANTED UNTIL ALL OTHER REQUIRED
MDEQ PERMITS AND APPROVALS ARE SATISFACTORILY ADDRESSED

IS LCNOI FOR A FACILITY THAT WILL REQUIRE OTHER PERMITS?

YES ☐ NO ☒

IF YES, CHECK ALL THAT APPLY: ☐ AIR ☐ HAZARDOUS WASTE ☐ PRETREATMENT
☐ WATER STATE OPERATING ☐ INDIVIDUAL NPDES ☐ OTHER: _____

IS THE PROJECT REROUTING, FILLING OR CROSSING A WATER CONVEYANCE OF ANY KIND? (If yes, contact the U.S. Army Corps of Engineers' Regulatory Branch for permitting requirements.) YES ☐ NO ☒

IF THE PROJECT REQUIRES A CORPS OF ENGINEER SECTION 404 PERMIT, PROVIDE APPROPRIATE DOCUMENTATION THAT:

- The project has been approved by individual permit, or
- The work will be covered by a nationwide permit and NO NOTIFICATION to the Corps is required, or
- The work will be covered by a nationwide or general permit and NOTIFICATION to the Corps is required

IS THE PROJECT REROUTING, FILLING OR CROSSING A STATE WATER CONVEYANCE OF ANY KIND? (If yes, please provide an antidegradation report.) YES ☐ NO ☒

IS A LAKE REQUIRING THE CONSTRUCTION OF A DAM BEING PROPOSED? (If yes, provide appropriate approval documentation from MDEQ Office of Land and Water, Dam Safety.) YES ☐ NO ☒

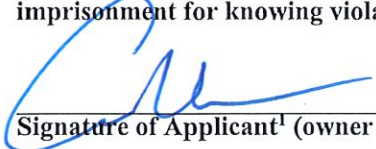
IF THE PROJECT IS A SUBDIVISION OR A COMMERCIAL DEVELOPMENT, HOW WILL SANITARY SEWAGE BE DISPOSED? Check one of the following and attach the pertinent documents.

- ☐ Existing Municipal or Commercial System. Please attach plans and specifications for the collection system and the associated "Information Regarding Proposed Wastewater Projects" form or approval from County Utility Authority in Hancock, Harrison, Jackson, Pearl River and Stone Counties. If the plans and specifications can not be provided at the time of LCNOI submittal, MDEQ will accept written acknowledgement from official(s) responsible for wastewater collection and treatment that the flows generated from the proposed project can and will be transported and treated properly. The letter must include the estimated flow.
- ☐ Collection and Treatment System will be Constructed. Please attach a copy of the cover of the NPDES discharge permit from MDEQ or indicate the date the application was submitted to MDEQ (Date: _____.)
- ☐ Individual Onsite Wastewater Disposal Systems for Subdivisions Less than 35 Lots. Please attach a copy of the Letter of General Acceptance from the Mississippi State Department of Health or certification from a registered professional engineer that the platted lots should support individual onsite wastewater disposal systems.
- ☐ Individual Onsite Wastewater Disposal Systems for Subdivisions Greater than 35 Lots. A determination of the feasibility of installing a central sewage collection and treatment system must be made by MDEQ. A copy of the response from MDEQ concerning the feasibility study must be attached. If a central collection and wastewater system is not feasible, then please attach a copy of the Letter of General Acceptance from the State Department of Health or certification from a registered professional engineer that the platted lots should support individual onsite wastewater disposal systems.

INDICATE ANY LOCAL STORM WATER ORDINANCE (I.E. MS4) WITH WHICH THE PROJECT MUST COMPLY:

Harrison County MS4

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


Signature of Applicant¹ (owner or prime contractor)

10/21/25
Date Signed

Glenn Needham

Printed Name¹

Plant Manager

Title

¹This application shall be signed as follows:

- For a corporation, by a responsible corporate officer.
- For a partnership, by a general partner.
- For a sole proprietorship, by the proprietor.

For a municipal, state or other public facility, by principal executive officer, mayor, or ranking elected official

Please submit the LCNOI form to:

Chief, Environmental Permits Division
MS Department of Environmental Quality, Office of Pollution Control
P.O. Box 2261
Jackson, Mississippi 39225

Electronically:

<https://www.mdeq.ms.gov/construction-stormwater/>

Revised 3/23/22

ATTACHMENT II

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

LARGE CONSTRUCTION STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

Chemours Company FC LLC, Delisle Plant



**7685 Kiln Delisle Road
Pass Christian, Mississippi 39571**

Prepared By:

TRINITY CONSULTANTS, INC.
141 Township Avenue
Suite 304
Ridgeland, MS 39157

October 2025

Project 252501.0045

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FIGURES:

FIGURE 1 – Site Location Map

FIGURE 2 – Aerial Map

FIGURE 3 – Scaled Site Map

APPENDICES:

APPENDIX A – Implementation Guidelines For Storm Water and Erosion Controls

APPENDIX B – Storm Water and Erosion Controls Change Form

APPENDIX C – Site Inspection and Certification Form

APPENDIX D – Employee Training Log

APPENDIX E – MS Secretary of State Certificate of Good Standing

APPENDIX F – Large Construction Storm Water General Permit

APPENDIX G – Wetland Delineation

RECORD OF REVISIONS

Revision Date	Reason for Revision	Revised Pages, Tables, Figures, or Appendices	Person(s) Responsible For Revisions
10/17/2025	Developed SWPPP to comply with Mississippi Large Construction Storm Water General Permit	Entire document.	Morgan Hodges (Trinity) Jennifer Deignan (Trinity)

1.0 LARGE CONSTRUCTION STORM WATER POLLUTION PREVENTION PLAN (SWPPP) CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Signature

Glenn Needham

Name (Printed)

Chemours Company FC LLC

Company

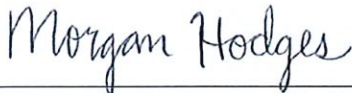
10/21/25

Date

Plant Manager

Title

The Large Construction Storm Water Pollution Prevention Plan (SWPPP) was prepared in accordance with sound engineering practices and identifies potential sources of pollution, which may reasonably be expected to affect the quality of storm water discharges associated with industrial activity from the facility. The SWPPP describes and ensures the implementation of best management practices, which will reduce pollutants in storm water discharges and assure compliance with the terms and conditions of the Large Construction Storm Water General Permit. The information presented herein constitutes a true and accurate representation of the information, findings, and observations made during the site investigation and preparation of the plan.



Morgan Hodges, P.E.
Senior Consultant
Trinity Consultants, Inc.

State of Mississippi
Registration No. 36488



10/17/2025

Date

2.0 SWPPP OVERVIEW

2.1 Introduction

The Large Construction General Permit requires that construction activities disturbing more than five (5) acres develop a Large Construction Storm Water Pollution Prevention Plan (SWPPP). The Construction SWPPP is used to identify practices and controls that will be utilized to prevent erosion of disturbed soils and to manage potentially contaminated storm water runoff from the construction site.

Chemours Company FC LLC, The Delisle Plant (Chemours) plans to construct a laydown area to assist in the construction of PCC GulfChem Corporation (PCC) located at 7685 Kiln DeLisle Road in Pass Christian, Harrison County, Mississippi. The laydown area will be constructed approximately 0.25 miles northeast of the PCC construction site boundary, and is necessary due to construction restraints from building PCC on Chemours property. Construction activities include clearing, grubbing, grading, excavation, and installation of gravel resulting in the disturbance of more than five acres of total land area, and is considered to be engaging in "industrial activity" under 40 CFR 122.26(b)(14)(x) with the potential to discharge storm water associated with industrial activities. Therefore, the facility is subject to the requirements to obtain an NPDES permit and prepare a Large Construction Storm Water Pollution Prevention Plan (SWPPP).

Chemours has prepared this SWPPP for construction activities located northeast of Kiln Delisle Road, Pass Christian, Mississippi. This SWPPP was developed and will be implemented in accordance with the requirements of the Mississippi Department of Environmental Quality (MDEQ) Large Construction Storm Water General Permit under the NPDES Wastewater Program. The SWPPP follows the guidelines presented in the MDEQ SWPPP Guidance Manual for Construction Activities.

The SWPPP identifies potential sources of pollution that may affect the quality of storm water discharges associated with construction activity, evaluates the risk of storm water discharges from these sources, and presents the management practices that will be used at the facility for minimization of pollutants in storm water discharges. All reports and certifications required by the Large Construction Storm Water General Permit will be signed by a responsible corporate officer or duly authorized representative who has responsibility for the overall facility operations or overall responsibility for environmental matters. The SWPPP will be retained onsite at all times and made available upon request to an authorized representative of the MDEQ and/or United States Environmental Protection Agency (EPA). The SWPPP will be amended whenever there is a change in construction, operation, maintenance, or footprint of the facility that may affect the discharge of storm water.

2.2 General Information

Site Name:		Chemours Company FC LLC, Delisle Plant			
Mailing and Physical Address:		7685 Kiln DeLisle Road, Pass Christian, Mississippi 39571			
Location (GPS):		Latitude:	30° 23' 19" N	Longitude:	89° 18' 26" W
Site Response Contact:		Robert Mills, Environmental Leader			
Office:	(228) 255-2264	Cell:	(228) 860-4785	Email:	robert.mills@chemours.com

Closest Water Body and Route of Entry:	Sheet flow to the south and east on WDU 24, sheet flow east on WDU 25, and sheet flow south on the man camp area where the water will ultimately drain south to Saint Louis Bay.		
Is the receiving stream identified on the Section 303(d) List of Impaired Water Bodies?	No	Has a TMDL been completed for the receiving stream?	Yes – Pathogens (2000) and Fecal Coliform (2000)
Discharge to Municipal Separate Storm Sewer System (MS4)?	Yes	If yes, name MS4:	Harrison County

2.3 SWPPP Objectives

The EPA published regulations in November 1990 under the National Pollutant Discharge Elimination System (NPDES) program with the objective of controlling water pollution associated with storm water discharges. The goal of the storm water program was to improve water quality by reducing the number of pollutants contained in storm water runoff. Construction operations subject to the requirement of a NPDES storm water discharge permit must prepare and implement a SWPPP. Construction projects disturbing more than five (5) acres of land must obtain a large construction storm water general permit. In addition, MDEQ has published a SWPPP Guidance Manual for Construction Activities that specifies methods for temporarily and permanently controlling sediment erosion for construction activities. MDEQ addresses storm water management through the implementation of site-specific SWPPP to address pollutants and sources associated with storm water runoff. The MDEQ requires structural and nonstructural best management practices (BMPs) to manage and reduce pollutants carried in storm water. The objectives of the Construction SWPPP are as follows:

- Identify potential sources of pollution and associated risk, which may affect the quality of storm water discharges;
- Allow on-site managers to make field decisions as to the viability and number of controls to be implemented.
- Establish procedures to amend the SWPPP whenever there is a change in construction, operation, or maintenance which may potentially affect the discharge of pollutants to state waters; or if the SWPPP proves to be ineffective in controlling storm water pollutants.
- Establish procedures to inspect and maintain erosion and sediment controls and other protective measures.

2.4 SWPPP Elements

In order to meet the requirements of the Large Construction Storm Water General Permit, the subsequent sections of the SWPPP contain the following elements:

- **Section 3.0: Project Information** – Describes project and site characteristics.
- **Section 4.0: Erosion and Sediment Controls** – Describes controls for construction activities as well as the procedures for implementing such controls.
- **Section 5.0: Control Implementation and Inspections** – Explains sedimentation and erosion controls during on-going construction activities and the sequence in which construction activities occur.
- **Figures:** Includes Site Location Map, Aerial Map, Scaled Site Map with site control measures, BMPs, outfall locations, etc.

- **Appendices:** Provides documents and tools to assist with implementing and managing the SWPPP.

2.5 Allowable Non-Storm Water Discharges

The Mississippi Large Construction Storm Water General Permit contains provisions for allowable non-storm water discharges. Listed below are non-storm water discharges allowed by the permit:

- Discharges from actual fire-fighting activities;
- Fire hydrant flushing;
- Water used to control dust;
- Waters used to wash vehicles, wheel wash water and other wash water where detergents, soaps, or solvents are not used (11 Miss. Admin. Code Pt. 6, Ch.1);
- Potable water sources including uncontaminated waterline flushing;
- Routine external building washdown which does not use detergents, soaps, or solvents;
- Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used; directing pavement washwaters directly into any surface water, storm drain inlet, or storm water conveyance, unless the conveyance is connected to a sediment basin, sediment trap, or other effective control is prohibited;
- Uncontaminated air conditioning or compressor condensate;
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials such as solvents or contaminated ground water;
- Uncontaminated excavation dewatering; and
- Landscape irrigation.

2.6 Prohibited Non-Storm Water Discharges

The Mississippi Large Construction Storm Water General Permit contains provisions for prohibited non-storm water discharges. The non-storm water discharges prohibited by the Permit are listed below:

- Wastewater from washout of concrete (unless managed by an appropriate control);
- Wastewater from washout and cleanout of stucco, paint, form release oils, curing compounds and other construction materials;
- Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance;
- Soaps or solvents used in vehicle and equipment washing;
- Wastewater from sanitary facilities, including portable toilets; and
- Dewatering activities, including discharges from dewatering of trenches and excavations unless managed by BMPs.

3.0 PROJECT INFORMATION

3.1 Project Description

Chemours plans to construct a laydown area to assist in construction of PCC GulfChem Corporation (PCC) located at 7685 Kiln DeLisle Road in Pass Christian, Harrison County, Mississippi. Development will involve clearing, grubbing, grading, and installation of gravel for the construction of a laydown area approximately 0.25 miles northeast of the PCC construction area. The total area disturbed will be approximately 52.3 acres. A delineation was performed for the area showing the presence of an ephemeral stream and palustrine forested wetlands within the proposed disturbed acreage of WDU 24 and WDU 25 areas. The delineation was submitted to the Corps for an Approved Jurisdictional Determination, with the expectation that the impacted area is non-jurisdictional. The delineation can be found in **Appendix G – Wetland Delineation**.

Construction activities will occur in a few separate areas within the site: WDU 24 (approximately 13.8 acres) and WDU 25 (approximately 16 acres), the man camp on the east portion of the property (approximately 22 acres), and the road connecting the two areas (<0.5 acres). The 22-acre man camp is located 0.25 miles east of the WDU and WDU 25 areas and had previously been cleared for use in Hurricane Katrina cleanup. The existing road would be used for access between the man camp area and WDU 24 and WDU 25. Total expected disturbance would be +/- 52.3 acres.

3.2 Site Drainage

The proposed site topography currently slopes to the southeast on WDU 24 and 25. The man camp area is relatively flat, as it has been previously cleared and developed for response teams to camp after Hurricane Katrina. Storm water on WDU 24 drains in the southeastern and southern direction through sheet flow onto WDU 25. Storm water flows via sheet flow from the west to the east toward a ditch on WDU 25 and exits through SW001. Storm water on the existing man camp flows to the south and exits via sheet flow. Flow from all construction activities will ultimately travel south, draining to Saint Louis Bay. Topographical and aerial maps of the site are provided as **Figure 1 – Site Location Map** and **Figure 2 – Aerial Map**, respectively. **Figure 3 – Scaled Site Map** contains a drawing with site specific details including storm water flows, outfall locations, and erosion and sediment controls.

Saint Louis Bay is the receiving stream for this project, which is in the Coastal Streams Basin and has Total Maximum Daily Load (TMDL) limits established for Pathogens (2000) and Fecal Coliform (2000). Sources of pathogens and fecal coliform could potentially include human and animal waste, poor sanitation practices, or runoff from nearby pastures that could be potentially conveyed offsite through stormwater runoff. This project will not involve construction activities that would add the potential for human waste, nor will any portable toilets be onsite. While animal waste may be present within the soil during construction, the sediment basin, silt fencing, and distance from the receiving stream should adequately minimize negative impacts; therefore, this construction project is not expected to impact the established TMDLs.

4.0 EROSION AND SEDIMENT CONTROLS

4.1 Control Methods

The Storm Water Guidance Manual for Construction Activities lists the following control procedures that must be observed at the construction site:

- Control storm water volume and velocity within the site to minimize soil erosion at outlets and to minimize downstream channel and stream bank erosion;
- Minimize the amount of soil exposed during construction activity;
- Minimize the disturbance of slopes;
- Minimize sediment discharges from the site;
- Provide and maintain natural buffers around surface waters, direct storm water to vegetated areas to increase sediment removal and maximize storm water infiltration;
- Minimize soil compaction and, unless infeasible, preserve topsoil;
- Transport runoff down slopes through lined channels or piping;
- Minimize the amount of cut and fill;
- Minimize off-site vehicle tracking of sediment; and
- Implement best management practices to mitigate adverse impacts from storm water runoff.

The control procedures and practices have been incorporated as needed for the site and the type of development. This is a relatively flat site, and the primary method of controls are expected to be slight grading (approximately 2% slope), silt fencing, double silt fencing of buffer zones, check dams, and erosion logs.

4.2 Vegetative Practices and Stabilization Measures

Vegetative practices will be implemented to preserve existing vegetation, as much as feasible, and initiate vegetative stabilization measures after land disturbing activities. The use of temporary and permanent seeding, buffer zones, topsoil preservation, and appropriate use of heavy equipment are all practicable forms of such vegetative practices. Soil stabilization and/or vegetative stabilization measures must be initiated whenever any clearing, grading, excavating or other land disturbing activities have temporarily or permanently ceased on any portion of the site and will not resume for a period of fourteen (14) days or more. The appropriate temporary or permanent vegetative practices will be initiated immediately but no later than the next workday.

- **Temporary Stabilization:** Construction activities leaving an exposed surface fourteen (14) days or more should be planted with fast growing annual grasses. Alternative to seeding, temporary non-vegetative stabilization measures may be considered. These measures may be, but are not limited to: erosion control blankets, mulching, or geotextiles.
- **Permanent Seeding:** Completed areas or areas where no further construction work is expected, except where structural controls are implemented, will utilize perennial grasses to stabilize the soil. These areas should be seeded and covered with soil reinforcing mats or ditch

liners, as appropriate. Decisions may be made to sod some areas where immediate permanent vegetation is needed.

- **Buffer Zones:** A maintained minimum 150-foot buffer zone is recommended between land disturbing activities and perennial water bodies. In this case, no federally jurisdictional waters are within the project boundary. At least 50-foot undisturbed natural buffer and silt fencing will be implemented between the project boundary and jurisdictional waters.
- **Topsoil:** A minimum depth of two (2) inches of stockpiled topsoil will be distributed on 3:1 slopes and four (4) inches on flatter slopes. The use of original topsoil will aid in re-vegetation of the disturbed area.
- **Heavy Equipment:** The areas to be re-vegetated will be avoided by heavy equipment. If compaction cannot be avoided, the top four (4) inches of the soil bed will be tilled and fertilized, if necessary, prior to re-vegetation.

Vegetative practices that will be utilized for this project include the temporary and permanent seeding of exposed areas as required. Buffer zones will be used around storm water drainages and ditches and along the property boundaries where possible. Topsoil removed from the site will be stockpiled on the site for use in post closure activities. To reduce compaction in the area of construction, heavy equipment will make every effort to avoid the areas to be re-vegetated.

4.3 Structural Practices

Structural practices will be used to divert flows from exposed soils, store or slow flows, or otherwise limit runoff from exposed areas. Such practices can include, but are not limited to, the use of silt fences, erosion logs, rock check dams, and outlet controls, construction entrance/exit, perimeter controls, and project phasing. The following practices are planned and expected:

- **Silt Fences:** May be utilized to capture sediment down gradient from construction or disturbed areas created by sheet flow. For sites with relatively gentle slopes, these types of controls will constitute most of the erosion controls utilized. Frequent monitoring of controls must be performed. Sediment must be removed when the accumulation is more than one-half (1/2) the height of the control height. These barriers may be utilized in drainage ways with low flow volume, and the barriers must be inspected after each rain event and repairs made as appropriate. These types of control are not intended for steep slopes.
- **Sediment Basin:** Sediment Basins are required for a drainage point at the boundary of land disturbing activity that serves an area with ten (10) or more disturbed acres at one time. Basins must be designed to provide at least 3,600 cubic feet of storage per acre drained until final stabilization of the site. Additionally, basins must be installed before initial site grading and utilize outlet structures that withdraw water from the surface. This project will have one sediment basin draining 22.8 acres with approximately 117,000 cubic foot capacity.
- **Construction Entrances/Exits:** Traffic exiting the project area will be restricted to designated entrance/exit points with appropriate stabilization techniques. Vehicles will have sediment removed before exiting onto paved roads. The construction entrances/exits will be cleared of sediment buildup daily to minimize sediments leaving the project site.
- **Perimeter Controls:** Natural areas will be maintained and supplemented with silt fence or a double layer of silt fence around the project perimeter.

- **Project Phasing:** Schedule or sequence construction activities so as to concentrate work in certain areas so as to minimize the amount of soil that is exposed at one time. This project will not require the entire 52.3 acres to be disturbed at one time; therefore, meeting the 50-acre phasing requirement in ACT 5, T-8(H) of the general permit.

Structural practices that will be utilized for this project include construction entrance, sediment basin, wattles, silt fencing throughout the project site. The existing entry roads are graveled and will operate as construction entrance and exit to reduce erosion and assist with housekeeping efforts on the local/state access road. Construction traffic leaving the site will do so through the construction exit located on the western portion of the site. Site grading and minimum slope grading will produce sheet flow with minimum runoff and erosion potential. The Scaled Site Map in **Figure 3** provides locations and design details for these BMPs.

4.4 Post-Construction Control Measures

Post-construction control measures will be installed to control pollutants in storm water after construction is complete. These controls could include, but are not limited to, on-site attenuation using gravel for the laydown area. Where needed, velocity dissipation devices may be along the outfall channel to provide for a non-erosive flow. For this project, the primary means of post-construction control of storm water runoff will be final grading and design of a site drainage system to ensure water velocity is reduced and routed to existing storm water drainage systems leaving the property.

4.5 Good Housekeeping

Housekeeping should be designed to keep pollutants from entering storm water. All equipment used for site activities will be routinely inspected. Waste receptacles will be provided, and their exact location will be determined in the field. Portable sanitary facilities and fuel storage containers may be utilized during site activities and will be inspected. Their exact locations will be determined in the field as well. The contractor will remove mud/soil daily from pavement and the construction entrances/exits, as necessary, to minimize the tracking of mud onto paved roadways from construction areas. Chemicals will not be used during construction activities or after construction has ceased; thus, there will be no chemical storage on-site. Vehicle maintenance will be conducted offsite. Silt fences will be installed around the perimeter of the project including between the project boundary and any paved/graveled road to prevent sediments being deposited onto roadways. Inspections of good housekeeping measures will be monitored in conjunction with the weekly inspections and corrective actions will be documented.

5.0 CONTROL IMPLEMENTATION AND INSPECTIONS

5.1 Implementation of Controls

Before construction activities begin, any necessary erosion, sedimentation, and storm water controls will be planned and implemented. During the construction project, the need for different or additional erosion and sedimentation controls may arise due to a failure of a control or a change in construction activities. The site operator is responsible for implementing all necessary erosion and sedimentation controls to minimize the impact of receiving waters.

Erosion and storm water controls will be implemented as needed during the course of the project. Implementation of the controls will proceed according to the Implementation Guidelines for Storm Water and Erosion Controls provided in Appendix A. Prior to the commencement of construction activities, the controls will be installed following the general guidelines. The exact controls installed, and the guidelines are subject to modification during the project by the site manager. Changes to the proposed controls will be indicated on the Storm Water and Erosion Control Change Form found in Appendix B. In addition to the Change Form, changes will be clearly marked, dated, and initialed on Figure 3 – Scaled Site Map. Minor changes will include alternate locations of controls or use of an alternate type of control that will provide equal or improved sediment control. Any major changes, such as a decision to utilize a different type of control for major portions of the project, will require an amendment to this plan.

Erosion controls must be installed even if they may be located in the way of subsequent activities, such as utility installation, grading or other construction activities. Controls must be temporarily removed, if necessary for subsequent access, and immediately replaced. Removed controls may not be left in a non-functioning state while other construction activities are completed.

5.2 Training Requirements

Effective management of storm water pollution will require site personnel responsible for implementing and/or complying with the SWPPP to be familiar with conditions that may cause pollution. Furthermore, day-to-day use of BMPs by employees is essential for the success of the SWPPP. The designated site personnel responsible for ensuring the implementation of the guidelines established in the Large Construction Storm Water General Permit and the SWPPP will be properly trained to include the following elements:

- Housekeeping and pollution prevention requirements;
- Spill prevention and response procedures;
- Identification and elimination of non-allowable, non-storm water discharge;
- Installation, maintenance and inspection of erosion and sediment controls for any construction activities;
- Installation, maintenance, and inspection BMPs;
- Procedures for conducting monthly inspections and any required monitoring;
- Recordkeeping, reporting, and record retention requirements;
- Release reporting and non-compliance notification and reporting requirements; and
- Standard requirements of the Large Storm Water General Permit.

Training is required to be conducted before commencement of activities and training documentation is provided in the Employee Training Log Form in Appendix D. Newly hired employees will be trained in the responsibilities of storm water management prior to performing such duties. Chemours is not required to provide or document formal training for subcontractors or other outside service providers but must ensure that such personnel understand any requirements that may be affected by the work they are subcontracted to perform. Regular feedback regarding the implementation and maintenance of the SWPPP is encouraged from all site personnel. The personnel responsible for the site will evaluate the effectiveness of the training program and make improvements as necessary to promote employee awareness.

5.3 Non-Numeric Limitations

Storm water discharges shall be free from:

- Debris, oil, scum, and other floating materials other than in trace amounts;
- Eroded soils and other materials that will settle to form objectionable deposits in receiving waters;
- Suspended solids, turbidity and color at levels inconsistent with the receiving waters; and
- Chemicals in concentrations that would cause violation of State Water Quality Criteria in the receiving waters.

5.4 Inspection Requirements

Inspection of the entire site, all erosion controls, and other plan requirements shall be performed during land disturbing activities. Inspections shall be performed:

- At least once per week with a minimum of four (4) inspections per month;
- Immediately before anticipated storm events;
- After rainfall events that produce a discharge; and
- As often as is necessary to ensure that appropriate erosion and sediment controls have been properly constructed and maintained and determine if additional or alternative control measures are required. (Unauthorized changes, erosion, and control failures will be noted on the inspection forms).

5.5 Documentation of Inspections

All inspections must be documented on the Large Construction General Permit Inspection and Certification Form located in Appendix C. Documentation of all inspections must be kept with the plan on-site. Inspections must continue until such time that planned construction activities have been completed, land disturbing activities have ceased and disturbed areas have been stabilized with no significant erosion occurring. Inspection records will be maintained for a period of at least three (3) years from the date construction was completed.

5.6 Non-Compliance Reporting

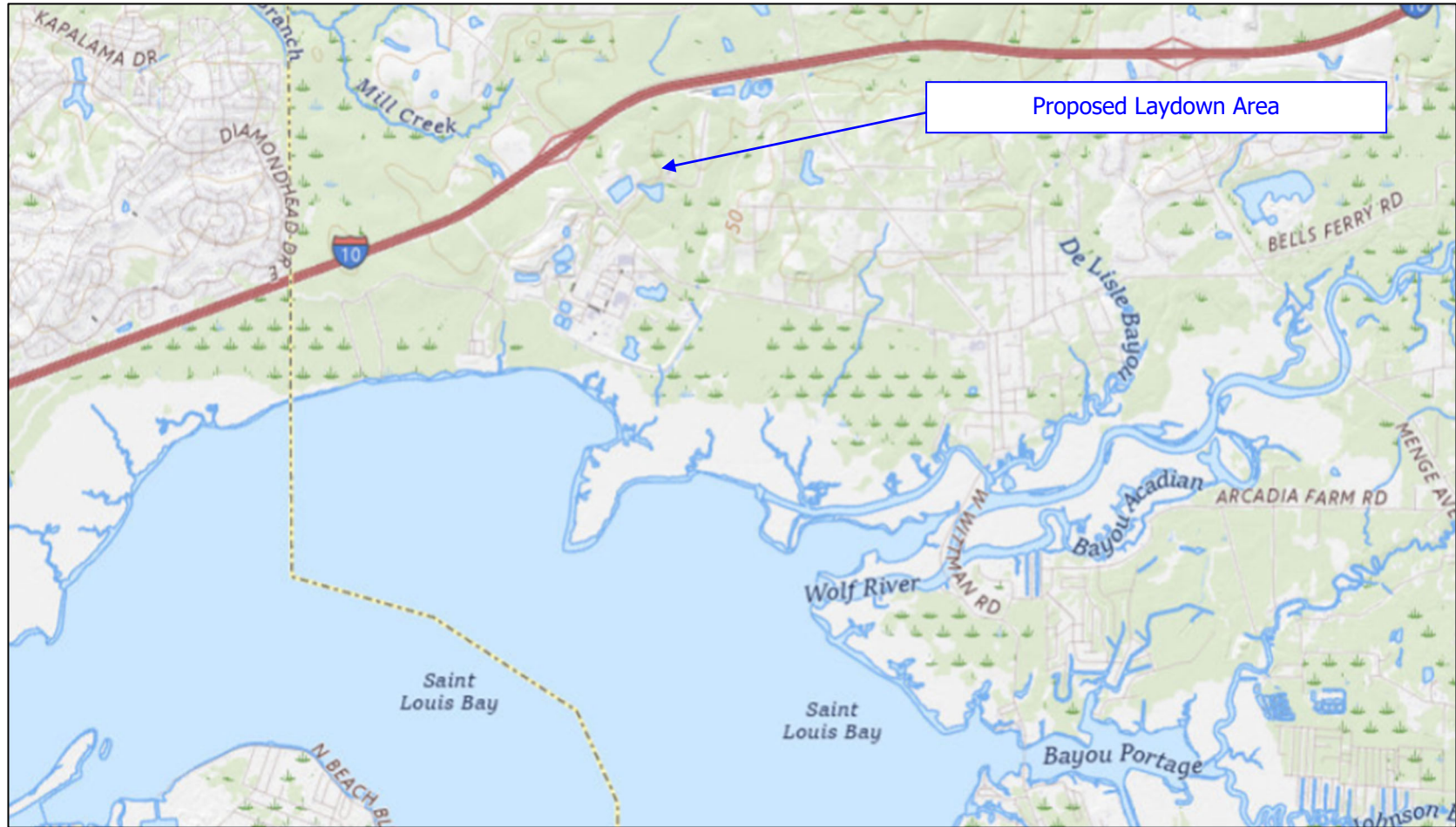
Anticipated Noncompliance: The owner or operator shall give at least ten (10) days advance notice, if possible, before any planned noncompliance with plan requirements.

Unanticipated Noncompliance: The owner or operator shall notify MDEQ orally within 24 hours from the time they become aware of unanticipated noncompliance. A written report shall be provided to MDEQ within five (5) working days of the time the site operator becomes aware of the circumstances. The report shall describe the cause, the exact dates and times, steps taken or planned to reduce, eliminate, or prevent recurrence and, if the noncompliance has not ceased, the anticipated time for correction

Mailing Address:	Physical Address:
MDEQ Chief, Environmental Compliance & Enforcement Division P.O. Box 2261 Jackson, MS 39225-2261	MDEQ Chief, Environmental Compliance & Enforcement Division 515 East Amite Street Jackson, MS 39201
Phone:	(601) 961-5171

FIGURES

FIGURE 1 – SITE LOCATION MAP



Source:
Nationalmap.gov

Legend:
N/A

Drawn By/Checked By: JAD

Date: 10/17/2025

Chemours Company FC LLC, Delisle Plant
Laydown Area
7685 Kiln Delisle Road
Pass Christian, Mississippi 39571

Figure 1: Site Location Map

Trinity
Consultants



FIGURE 2 – AERIAL MAP



Source:
Google Earth Pro

Legend:
N/A

Drawn By/Checked By: JAD

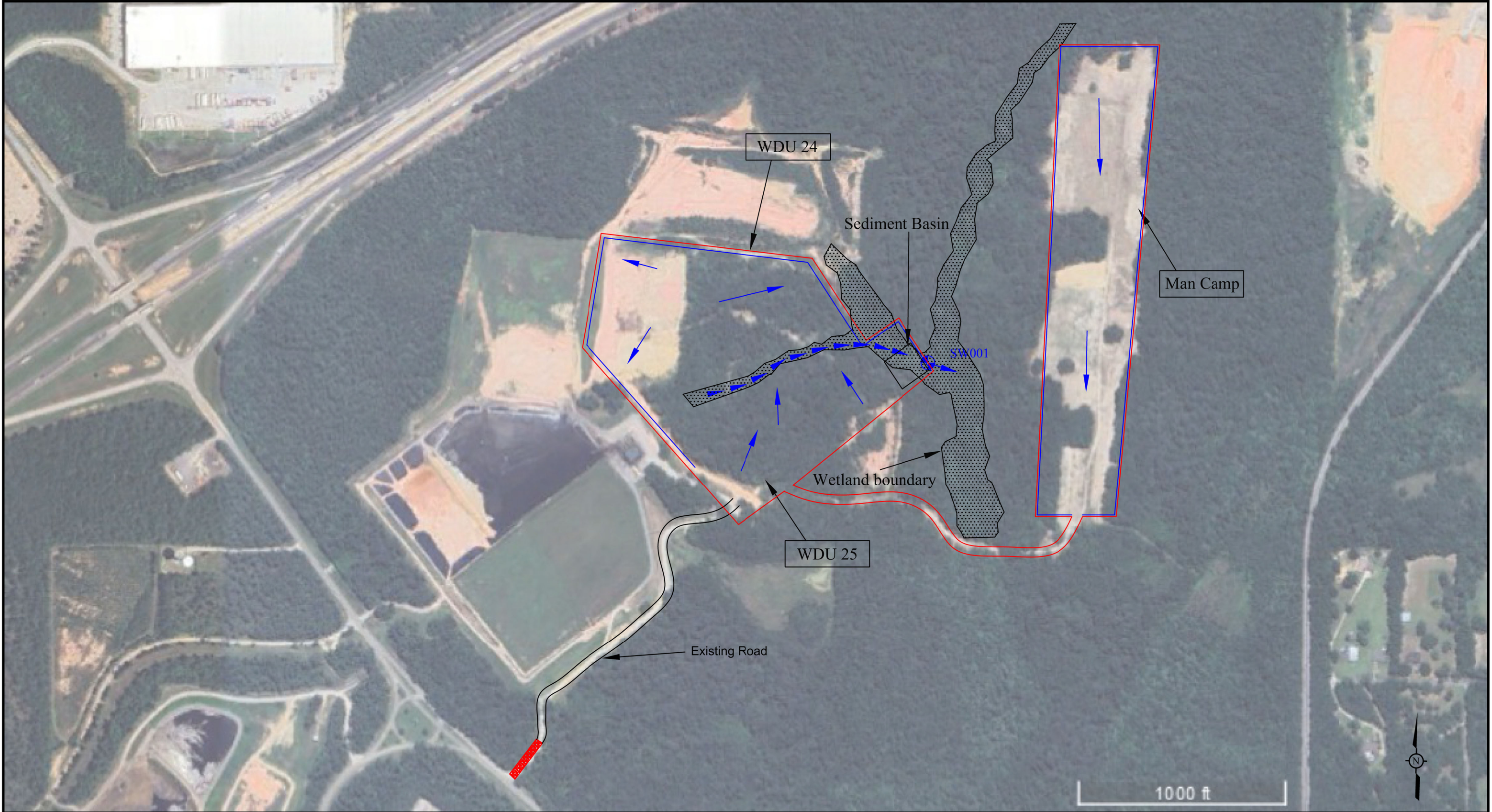
Date: 10/17/2025

Chemours Company FC LLC, Delisle Plant
7685 Kiln Delisle Road
Pass Christian, Mississippi 39571

Figure 2: Aerial Map



FIGURE 3 –SCALED SITE MAP



141 Township Avenue Ste 304
Ridgeland MS 39157
(662) 840-5945

Chemours Company FC LLC, Delisle Plant
7685 Kiln Delisle Road
Pass Christian, MS 39751

Scaled Site Specific Map

Figure 3

Legend:

Limits of Disturbance ———
Silt Fencing ———
Construction Entrance 

Storm Water Flow Direction 
Wetlands 

Scale: See Map

Drawn By: JAD

Date: 10/16/2025

APPENDIX A – IMPLEMENTATION GUIDELINES FOR STORM WATER AND EROSION CONTROLS

IMPLEMENTATION GUIDELINES FOR STORM WATER AND EROSION CONTROLS

Storm water and erosion controls will be installed according to construction plans and based on need as construction progresses. The following sequence of installation is planned and is typical for a project of this nature. Controls will be installed prior to construction activities and are shown in the Site Diagrams provided in Figure 3 – Scaled Site Map. Decisions to make changes in individual controls will be made on-site by the site contact and will be indicated on the Change Form (Appendix B) and on the attached figure(s), as necessary. However, any decisions for major or significant control changes or to change the sequence of installation of controls may require a change to this plan.

Sequence of Construction

Phase I:

1. The owner/contractor shall maintain one (1) copy of the stamped plans and coverage letter on-site at all times. These documents shall be stored in the job trailer or within a weather-tight job box, mounted at a convenient and accessible location.
2. The owner/contractor shall stage materials and equipment in the temporary owner/contractor lay down and staging. The owner/contractor may utilize a different location as desired, at the approval of the site contract. Equipment and refueling stations shall be located by the owner/contractor and shown on the plans. All refueling stations shall be in accordance with all applicable local, state, and federal regulations.
3. The owner/contractor shall determine and mark the limits of disturbance.
4. The owner/contractor shall install perimeter silt fence, sediment basin, wattles, and construction entrance best management practices (BMPs) as indicated on the drawings, performing clearing and grubbing only as necessary for installation. The owner/contractor is solely responsible for the prevention of sediment transport from the site during construction activities. If at any point during construction, sediment is transported from the site or impacts downstream properties, the owner/contractor shall be responsible for the restoration of conditions due to the impacts. If the owner/contractor identifies areas of the site where additional BMPs may be necessary due to incremental grading activities, the engineer shall be notified for review and approval.
5. The owner/contractor shall inspect and maintain all BMPs throughout construction, until notified in writing by the engineer that a BMP can be removed. Inspections shall be at least weekly for a minimum of 4 inspections per month and as often as necessary to ensure that appropriate erosion and sediment controls have been constructed and maintained to determine if additional or alternative control measures are required.
6. Begin rough grading activities. The owner/contractor shall stage grading in a manner which will maintain positive drainage to the installed BMPs throughout construction activities.
7. The owner/contractor is responsible throughout construction activities for the maintenance and establishment of all permanent and temporary vegetation.
8. All topsoil shall be stored on-site for reuse in the designated topsoil stockpile area. The owner/contractor may designate other topsoil stockpile areas at their discretion, however, reinforced double row silt fence must be provided and maintained around the perimeter of all stockpiles. These stockpiles shall be detailed on the drawings, and approved by the engineer.
9. The owner/contractor shall verify all BMPs referenced in Phase I have been installed and are performing as expected prior to proceeding with Phase II.

Phase II:

10. Inspect and maintain all BMPs installed in Phase I, remove sediment deposits as necessary prior to proceeding with Phase II activities. Inspections shall be at least weekly for a minimum of 4 inspections per month and as often as necessary to ensure that appropriate erosion and sediment controls have been constructed and maintained and to determine if additional or alternative control measures are required.
11. Continue rough grading activities. The owner/contractor shall stage grading in a manner which will maintain positive drainage to the installed BMPs throughout construction activities.
12. Any areas where grading activities cease for a period of 14 days or longer shall be seeded for the establishment of temporary vegetation.
13. The owner/contractor shall grade within the limits of the site contained by diversion swales. The diversion swales shall be maintained in a clear, flowable condition at all times throughout the grading activities.
14. The owner/contractor shall be responsible for the protection and maintenance of all slopes throughout construction activities, which may require multiple BMPs (tracking, stair step grading, slope grooving, temporary grassing, pipe slope drains, etc.) until final grades have been achieved. Surface runoff shall be directed away from the face of all slopes to the greatest extent possible. Utilize BMPs mentioned above to protect slope faces. The cut and fill slope faces shall receive a minimum thickness of 4" of topsoil and shall then be seeded for the establishment of permanent vegetation lined with as soon as desired grades are achieved.
15. Begin installation of the storm drainage system as grades allow. Depending on the owner/contractor's desired installation sequence, it may be necessary to core temporary drainage holes through the sides of storm drain structures in areas where the structures extend above adjacent grades. If such conditions are necessary, the owner/contractor shall provide inlet protection around the cored holes until grades are raised to allow surface drainage through the top of the structure. All cored holes shall be filled with non-shrink grout upon completion. The owner/contractor shall immediately install inlet protection BMPs to each structure receiving surface flow.
16. The owner/contractor shall continue grading activities, maintaining positive drainage to storm drainage structures protected by inlet protection, and also away from slope faces.
17. Begin fine grading activities within the building plateau area for building and equipment pads and along access roads and driveways.
18. Begin placement of gravel aggregate stone base course.
19. The owner/contractor shall remove all deposited sediment from the sediment controls and spread within the topsoil stockpile area. If necessary, the owner/contractor shall clear remaining topsoil from a portion of the area to allow placement of the sediment and respread topsoil over the moisture conditioned sediment.
20. Begin closure of the topsoil stockpile area by verifying a minimum thickness of 4" of topsoil and seeding for permanent vegetation to all remaining areas achieving final grades. Any remaining topsoil not utilized can be left in place or distributed and spread across landscape areas.
21. Once all disturbed areas have achieved a minimum uniform permanent vegetative density of at least 70% in all locations of the site not covered with pavement, the owner/contractor shall contact the engineer. The engineer shall prepare and submit the notice of termination (NOT)

and certification letter.

22. Upon approval, the NPDES permit coverage shall cease and no further land disturbance or site work shall be permitted.

APPENDIX B – STORM WATER AND EROSION CONTROLS CHANGE FORM

STORM WATER AND EROSION CONTROLS CHANGE FORM

[illegible]

APPENDIX C – SITE INSPECTION AND CERTIFICATION FORM

**LARGE CONSTRUCTION GENERAL PERMIT
SITE INSPECTION AND CERTIFICATION FORM
COVERAGE NUMBER (MSR10 ____)**



INSTRUCTIONS

Results of construction storm water inspections required by ACT6 of this permit shall be recorded on this report form and kept with the Storm Water Pollution Prevention Plan (SWPPP) in accordance with the inspection documentation provisions of ACT9 of the this permit. Inspections shall be performed at least weekly for a minimum of four inspections per month. The coverage number must be listed at the top of all Inspection and Certification Forms.

COVERAGE RECIPIENT INFORMATION

OWNER/PRIME CONTRATOR NAME: _____
PROJECT NAME: _____
PROJECT STREET ADDRESS: _____
PROJECT CITY: _____ PROJECT COUNTY: _____
OWNER/PRIME CONTRACTOR MAILING ADDRESS: _____
MAILING CITY: _____ STATE: _____ ZIP: _____
CONTACT PERSON: _____ CONTACT PHONE NUMBER: (____) _____
EMAIL ADDRESS: _____

INSPECTION DOCUMENTATION

DATE (mo/day/yr)	TIME (hr:min AM/PM)	ANY DEFICIENCIES? (CHECK IF YES)	INSPECTOR(S)
		☐	
		☐	
		☐	
		☐	
		☐	
		☐	

Deficiencies Noted During any Inspection (give date(s); attach additional sheets if necessary): _____

Corrective Action Taken or Planned (give date(s); attach additional sheets if necessary): _____

Based upon this inspection, which I or personnel under my direct supervision conducted, I certify that all erosion and sediment controls have been implemented and maintained, except for those deficiencies noted above, in accordance with the Storm Water Pollution Prevention Plan (SWPPP) and sound engineering practices as required by the above referenced permit. I further certify that the LCNOI and SWPPP information is up to date.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Authorized Signature _____

Date _____

Printed Name _____

Title _____

APPENDIX D – EMPLOYEE TRAINING LOG

MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY

Facility Name:		Physical Address:	
Coverage Number:		Training Date:	
Training Topic:			
Training Description:			
Employee Name (printed)	Employee Signature	Worker ID Number	Initial/Refresher
"I certify under penalty of law that this report is true, accurate, and complete, to the best of my knowledge and belief."			
Trainer Name (printed)	Trainer Signature	Date	

APPENDIX E – MS SECRETARY OF STATE CERTIFICATE OF GOOD STANDING



Michael Watson

SECRETARY OF STATE

This is not an official certificate of good standing.

Name History

Name	Name Type
The Chemours Company FC LLC	Legal

Business Information

Business Type:	Limited Liability Company
Business ID:	1043349
Status:	Good Standing
Effective Date:	06/23/2014
State of Incorporation:	DE
Principal Office Address:	1007 Market Street Wilmington, DE 19801

Registered Agent

Name
C T CORPORATION SYSTEM 645 LAKELAND EAST DRIVE, Suite 101 FLOWOOD, MS 39232

Officers & Directors

Name	Title
Denise Dignam 1007 Market Street Wilmington, DE 19801	Manager
Shane W. Hostetter 1007 Market Street Wilmington, DE 19801	Manager
Gerardo Familiar Calderon 1007 Market Street Wilmington, DE 19801	Manager

APPENDIX F – LARGE CONSTRUCTION STORM WATER GENERAL PERMIT

APPENDIX G – WETLAND DELINEATION

Jurisdictional Waters and Wetlands Determination Report Chemours Waste Management Units Units 24 and 25

Prepared for
**The Chemours Company FC, LLC
7685 Kiln DeLisle Road
Pass Christian, MS 39571**

By
**BMI Environmental Services, LLC
216 Boggs Circle
Long Beach, Mississippi 39560**

Project 03110-WMU 24-25

September 2025

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1.0 Introduction and Overview

BMI Environmental Services, LLC (BMI) was tasked by the Chemours DeLisle Plant to complete a Wetlands and Waters of the US (WOUS) determination for the proposed two **Waste Management Units (WMU) at the Chemours DeLisle Titanium Dioxide Plant in the Community of DeLisle, Harrison County, Mississippi**. Initial use of the area will be a laydown area for a large construction project at the main Chemours DeLisle Plant. Construction on the WMUs are currently forecasted in the next few years when the units will be needed in the future.

The purpose of Chemours' waste management units are to effectively handle, treat, and dispose of waste generated during their manufacturing processes in a way that minimizes environmental impact and ensures regulatory compliance. The total study area is approximately **65 acres**, and the geographic location is Section 33, Township 7 South, Range 13 West, Harrison County This Wetland and WOUS Delineation Report summarizes the results of on-site delineations conducted June 2025 through August 2025.

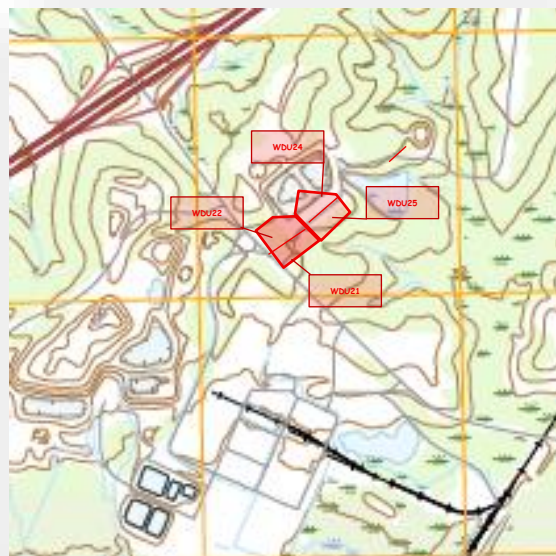


Figure 1: Waste Units project site.
(Source USGS Dedeaux Quadrangle-2021)

1.1 Project Description

Chemours proposes to construct two additional WMUs (proposed WMUs 24 and 25) northeast of the current WMUs (WMU 21 and 22). Additional WMUs are proposed to meet the future growth and to provide safe and efficient WMUs. Initial use of the area will be a laydown area for a large construction project at the main Chemours DeLisle Plant. Final plans call for the construction of WMU 24 which is set to be 13,80 AC+ and WMU25 which is estimated to be 15.7 AC+.

1.2 Purpose

The purpose of this study is to identify and describe on-site wetlands and WOUS that occur within the Study Area. Specific tasks performed for this study included: 1) reviewing background resource data/mapping, 2) conducting assessments and characterizing potential wetlands and WOUS, 3), mapping wetlands and WOUS, and 4) referencing the hydrology, vegetation, soils, and/or stream and other WOUS characteristics of the site.

This report describes the results of the wetland and WOUS assessment and is intended to provide the information necessary to identify jurisdictional areas, and regulatory requirements pertaining repairs or maintenance activities necessary to continue the operation of this important feature.

1.3 Wetland and WOUS Determination Methods

The Wetland and WOUS methodology for this project follows the procedures outlined in Part IV of the 1987 U.S. Corps of Engineers Wetlands Delineation Manual dated 1987 and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region Version 2.0 dated November 2010. Additionally the methods for determination of wetlands and WOUS were evaluated according to the United States Army Corps of Engineers (USACE) and United States Environmental Protection Agency (USEPA) guidance in the Revised Definition of ‘Waters of the United States,’ 88 FR 3004 (January 18, 2023) (“2023 Rule”), to conform to the 2023 Supreme Court decision in *Sackett v. EPA*, 598 U.S., 143 S. Ct. 1322 (2023) (“*Sackett*”). Additionally, the methods for this wetland determination includes the most recent March 12, 2025 implementation of the EPA and Department of Army memorandum to field personnel concerning the **proper implementation of a “continuous surface connection” consistent with *Sackett*** across **both currently operative regulatory regimes**.* The EPA and the Department of the Army will apply this guidance when determining if a wetland has a “continuous surface connection” to a requisite jurisdictional water under the Clean Water Act.”

The Specific tasks performed for this study include: 1) reviewing background resource data mapping, 2) reviewing the USFWS National Wetland Inventory information (NWI) aerial photographs aerial, 3) analysis of the NWI descriptions of the wetland areas within the study area, and 4) reporting wetlands and WOUS conditions based on hydrology, vegetation, soils and other necessary characteristics of the entire project area.

2.0 Environmental Setting and Site Conditions

2.1 Environmental Setting

The existing Waste Management Units (WMU 21 and WMU22) and the proposed additional WMUs (WMU24 and WMU 25) are located east of ***the Chemours Delisle Titanium Dioxide Plant*** and east of Kiln Delisle Road. This area is within the ecological region described as the East Gulf Coastal Plain (EGCP) ecoregion. The EGCP includes portions of Georgia, Florida, Alabama, Mississippi, and Louisiana, and stretches from southwest Georgia across the Florida Panhandle and west to southeastern Louisiana (The Nature Conservancy, 2001). This ecoregion is physically characterized by subtle topography, a warm to hot, humid maritime climate, and soils derived primarily from unconsolidated sands, silts, and clays transported to the ecoregion by the weathering of the Appalachian Mountains. Prevailing southerly winds provide moisture for high humidity and potential discomfort from May through September. Freezing temperatures present almost every winter. Normal precipitation ranges from about 50 to 65 inches across the state from north to south. Locally violent and destructive thunderstorms are a threat on an average of about 60 days each year. Pine woodlands are dominant over most of the landscape, on both upland and wetland sites. These pinelands (sandhills, pine flatwoods, and savannas) support a tremendous diversity of plant and animal species; most of them specialized to these systems.

Aerial photographs, information provided by plant management personnel, and site observations indicate that the study area has been modified in various portions of the study area provide staging uses, temporary equipment storage and temporary office and temporary worker housing to provide facilities after Hurricane Katrina.

2.2 Topography

The project site is located within the U.S. Geological Survey (USGS) topographic survey for the Dedeaux, Mississippi quadrangle. Two distinct physiographic divisions are represented in Harrison County. The Chemours Delisle Plant is located in a level strip of Coastal Lowlands called the Gulf Coast Flatwoods. The northern part of Harrison County, which is known as the “Southern Lower Coastal Plain”, is an older region dominated by pine flatwoods on weathered upland soils and rolling hills. The elevations on the study area range from 41 feet in the southern portion of the site to 61 feet in the northern portion of the site. Topographic maps indicate that the site slopes from northeast to southwest.

2.3 Soils

The study area contains 13 soil types of varying textures, permeability, depth to limiting layers, and varying depths to the seasonal water table (See Table 1).

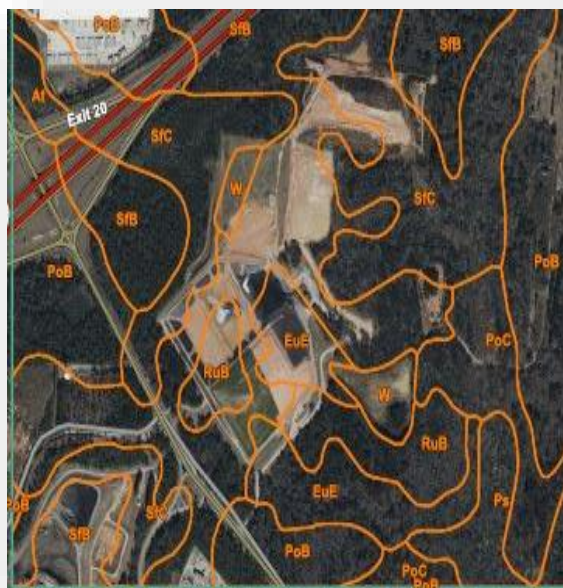


Figure 2 NRCS Soil Map showing soil classifications

Table 1: Soil Types

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
At	Atmore silt loam, 0 to 2 percent slopes	6.7	0.9%
EuE	Wadley and Poarch soils, 8 to 17 percent slopes	30.9	4.0%
HIA	Harleston fine sandy loam, 0 to 2 percent slopes	4.2	0.5%
HIB	Harleston fine sandy loam, 2 to 5 percent slopes	3.0	0.4%
Pm	Plummer loamy sand	18.2	2.3%
PoB	Poarch fine sandy loam, 2 to 5 percent slopes	245.3	31.5%
PoC	Poarch fine sandy loam, 5 to 12 percent slopes	102.4	13.2%
Ps	Ponzer and Smithton soils	78.0	10.0%
RuB	Ruston fine sandy loam, 2 to 5 percent slopes	24.9	3.2%
RuC	Ruston fine sandy loam, 5 to 8 percent slopes	8.6	1.1%
SfB	Saucier fine sandy loam, 2 to 5 percent slopes	137.0	17.6%
SfC	Saucier fine sandy loam, 5 to 8 percent slopes	94.4	12.1%
SnB	Saucier-Susquehanna complex, 2 to 5 percent slopes	14.1	1.8%

Of the 13 soil types listed in the study area, 11 soil types have Hydric Ratings that range from 92 to 2, and two soils (Poarch and Ruston) are not considered Hydric soils. (See Table 2).

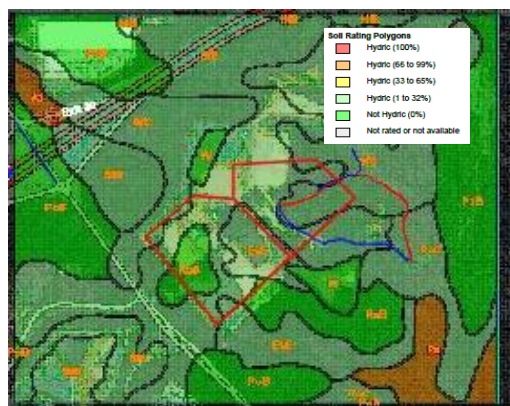


Figure 3: Soil Survey Map showing hydric soils:
Source USDA Web Soil Survey

Soil profiles were examined throughout the site using a handheld auger and hydric soils were confirmed to exist at various areas of the site. Typical hydric soil indicators observed were low chroma (chroma 2 or less) in the matrix from the soil surface to a depth of at least 20", and redoximorphic features within the upper 6" of the profile.

2.4 Hydrology

The project area is located within the Saint Louis Bay Watershed Basin 12-Digit Hydrologic Unit Code (031700091306). This watershed basin covers approximately 19,470 acres and includes the Bay of St. Louis (See Figure 4). Annual precipitation in this part of Harrison County ranges from 45.7 to 80.4 inches and the average annual precipitation is 62.3 inches. Rainfall patterns are typical of the Gulf Coastal Plain with sporadic, heavy afternoon showers. Surface hydrology characteristics Wetlands Inventory are also described by the USFWS National wetlands Inventory (NWI) Mapper (See Appendix A).

Table 2 Hydric Soil Ratings

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
At	Atmore silt loam, 0 to 2 percent slopes	85	4.6	0.9%
EuE	Wadley and Poarch soils, 8 to 17 percent slopes	7	30.9	6.2%
HIB	Harleston fine sandy loam, 2 to 5 percent slopes	11	3.9	0.8%
PoB	Poarch fine sandy loam, 2 to 5 percent slopes	0	105.2	21.3%
PoC	Poarch fine sandy loam, 5 to 12 percent slopes	7	28.0	5.7%
Ps	Ponzer and Smithton soils	92	16.0	3.2%
RuB	Ruston fine sandy loam, 2 to 5 percent slopes	0	24.9	5.0%
SfB	Saucier fine sandy loam, 2 to 5 percent slopes	5	159.9	32.3%
SfC	Saucier fine sandy loam, 5 to 8 percent slopes	2	111.8	22.6%
W	Water	0	9.3	1.9%
Totals for Area of Interest			494.5	100.0%



Figure 4 Bay Watershed Page 5 Basin 12-Digit Hydrologic Unit Code (031700091306)

The upper reaches of the study area consists of Freshwater Forested Shrub habitat and Broad-leaved Deciduous wood angiosperms, Broad Leaved Evergreens. The water regime classification for the upper wetland areas of the study area are described as Seasonally Saturated palustrine non tidal wetlands. This classification typically indicates that the substrate is saturated at or near the surface for extended period during growing season, but unsaturated conditions exist by the end of the season. Surface is typically absent but may occur for a few days after heavy rain and upland runoff.

Riverine systems are also identified on the NWI mapper. Based on field observations, the riverine systems are best described as ephemeral streams. No flow or standing water was observed within the streams during June and August 2025 onsite reconnaissance.

The predominant landforms onsite include convex hillslopes with approximately 2-5% slopes and concave drainageways with slopes ranging from 0-2%. Field indicators of wetland hydrology were observed within onsite wetlands. The indicators observed include oxidized rhizospheres, water-stained leaves, drift patterns, crayfish burrows. FAC-Neutral tests were positive at wetland determination data points DPW-1, DPW-2 and DPW-3.

2.5 Vegetation

The dominant plant communities within the study area include hardwood forested uplands and bayhead swamp. The forested uplands are dominated by water oak (*Quercus nigra*), live oak (*Quercus virginiana*), and black cherry (*Prunus serotina*) in the canopy, Chinese privet (*Ligustrum sinense*), and yaupon (*Ilex vomitoria*) in the mid-story and due to dense overstory have a sparse herbaceous layer dominated by seedlings. The bayhead swamp community is dominated by sweetbay (*Magnolia virginiana*) and swamp tupelo (*Nyssa biflora*) in the canopy, Chinese privet, yaupon, and titi (*Cyrilla racemiflora*) in the mid-story, and netted chainfern (*Woodwardia areolata*), Chinese tallow tree (*Triadica sebifera*), and Chinese privet (*Ligustrum sinense*) in the herbaceous layer. (

3.0 Determination Results

The study area was evaluated and characterized to develop information for jurisdictional determinations. Online resources including NRCS hydric soil maps, USFWS National Wetland Inventory maps, historical aerial photos, USGS topographic maps, and LYDAR 5' contour data were reviewed prior to field reconnaissance to identify potential wetlands and other waters for further investigation.

Field assessment determination results are based on field data collected in June and August 2025 which includes observed upper soil profiles sampled with soil pits and auger pits, identification of vascular plants, and observation of field indicators of wetland hydrology.

3.1 Traditionally Navigable Waters

Traditionally Navigable Waters (TNW) are all tidal waters and waters that have been, could be, or are used in interstate or foreign commerce. TNWs are jurisdictional and any tributary that continually flows directly or indirectly at least seasonally into a TNW is also jurisdictional. There are no TNWs within the project area and no wetlands or other waters within the project area which flow directly or indirectly into TNWs.

3.2 Relatively Permanent Waters

Relatively Permanent Waters (RPW)s are tributaries that flow year-round or have continuous flow at least seasonally, and that flow directly or indirectly into a TNW. There are no RPWs within the project area.

3.3 Non-relatively Permanent Waters

Non-RPWs are tributaries that do not flow continuously for at least 3 months of the year. This includes ephemeral tributaries or streams which only flow for a short period of time such as immediately following a rain event. Three ephemeral streams were identified within the project area during this investigation. Two of these streams are 1st order and one is 2nd order, receiving flow from the two onsite 1st order streams. These streams do not meet the Sackett ruling definition of WOTUS. However, since the project area occurs in Mississippi pre-2015 guidance regarding jurisdiction of these streams should be followed to determine if there is a Significant Nexus...

3.4 Wetlands

A wetland that does not exhibit “a continuous surface connection” to WOUS or is not directly connected to a TNW or RPW is not considered a jurisdictional wetland. The wetlands in the Rain Basin are not directly connected to TNW’s or RPW’s nor do the wetlands within the Rain Basin meet the “physical-connection requirement” that the adjacent wetland physically abuts or touches WOTUS.

4.0 Summary and Conclusions

A comprehensive study of the project area was completed in June and September, 2025 and approximately 453,020 square feet (10.4 acres) of forested wetlands were identified during this study. These wetlands occur within concave drainageways which are dominated by hardwoods and can be described as bayhead swamps. Three ephemeral streams were also identified within the project area wetlands. These streams were dry at the time of the survey. The streams flow south into three culverts situated under a dirt/gravel service road. The service road serves direct surface connections to downgradient forested wetlands and streams. Based on review of historical aerial photography, the service road was installed prior to January 1997.

Ephemeral streams, which are non-RPWs, were historically determined to be jurisdictional under Section 404 of the Clean Water Act only if a Significant Nexus to a TNW could be established. This means of asserting jurisdiction by Significant Nexus was overturned by a 2023 Supreme Court ruling in the case Sackett vs. EPA from which a new definition of Waters of the United States (WOTUS) was published by the United States Environmental Protection Agency (EPA) on August 29, 2023. The court ruled that a waterbody or water conveyance is jurisdictional only if it has a continuous surface connection to another WOTUS and further concluded that only RPWs are jurisdictional and not waters that are dry most of the time (i.e. ephemeral waters). However, due to ongoing litigation 27 states including Mississippi are required to follow the pre-2015 definition of WOTUS. In Mississippi jurisdiction of ephemeral tributaries and their adjacent wetlands is determined on a case by case basis by the USACE.

Based on the potential for onsite wetlands and streams to be non-jurisdictional it is our recommendation that the owner formally request a jurisdictional determination by the USACE Mobile District Regulatory Office.

5.0 References

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<https://www.epa.gov/national-aquatic-resource-surveys/ecoregions-used-national-aquatic-resource-surveys#CPL>

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Appendix A
Study Area and USFWS NWI Maps

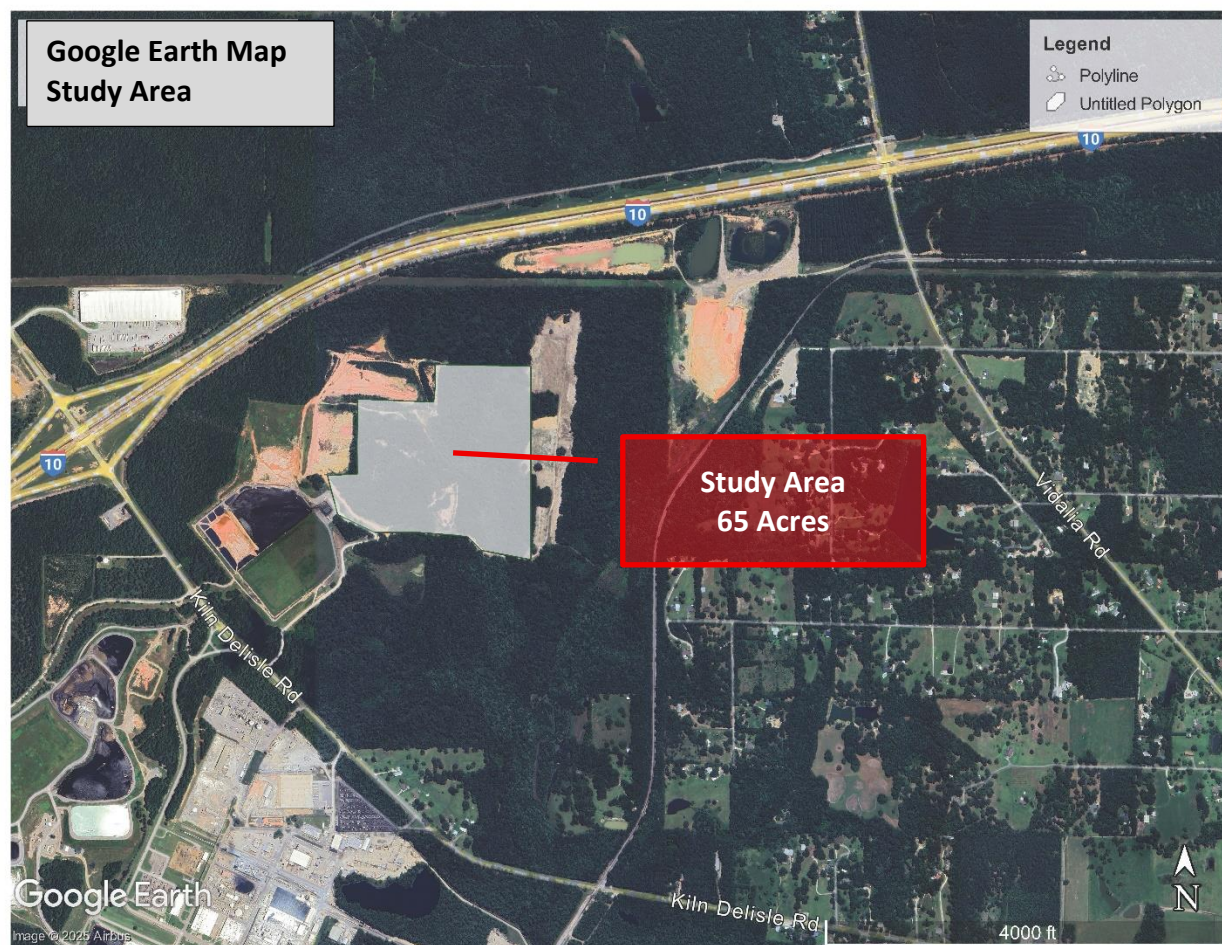


Figure 5 Study Area for WMU

Upper Wetland Site
NWI Map and Description



**This is a 25.06 acre Freshwater Forested/
Shrub Wetland habitat is classified as a PFO1/3B.**

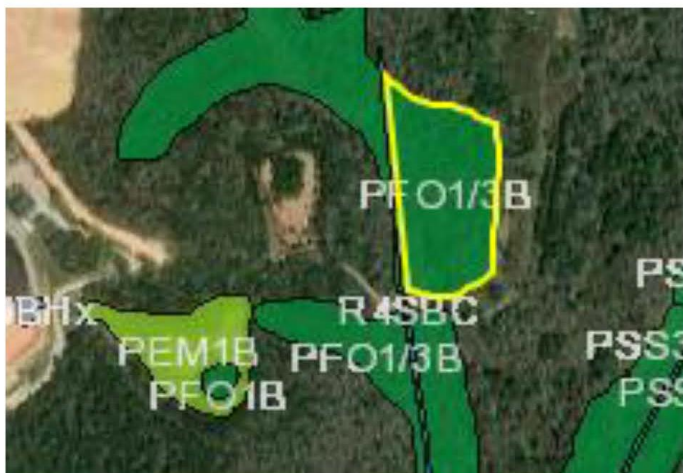
System **Palustrine (P)** : The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-

Subclass **Broad-Leaved Deciduous (1)** : Woody angiosperms (trees or shrubs) with relatively wide, flat leaves that are shed during the cold or dry season; e.g., black ash (*Fraxinus nigra*).

Split Subclass **Broad-Leaved Evergreen (3)** : Woody angiosperms (trees or shrubs) with relatively wide, flat leaves that generally remain green and are usually persistent for a year or more; e.g. red mangrove (*Rhizophora mangle*).

Water Regime **Seasonally Saturated (B)** : The substrate is saturated at or near the surface for extended periods during the growing season, but unsaturated conditions prevail by the end of the season in most years. Surface water is typically absent, but may occur for a few days after heavy rain and upland runoff.

Middle Wetland Site NWI Map and Description



**This is a 7.74 acre Freshwater Forested/Shrub Wetland
Habitat is classified as a PFO1/3B.**

System **Palustrine (P)** : The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.

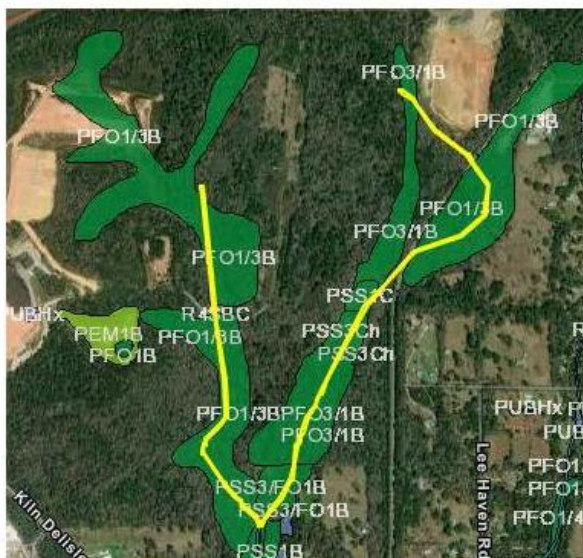
Class **Forested (FO)** : Characterized by woody vegetation that is 6 m tall or taller.

Subclass **Broad-Leaved Deciduous (1)** : Woody angiosperms (trees or shrubs) with relatively wide, flat leaves that are shed during the cold or dry season; e.g., black ash (*Fraxinus nigra*).

Split Subclass **Broad-Leaved Evergreen (3)** : Woody angiosperms (trees or shrubs) with relatively wide, flat leaves that generally remain green and are usually persistent for a year or more; e.g., red mangrove (*Rhizophora mangle*).

Water Regime **Seasonally Saturated (B)** : The substrate is saturated at or near the surface for extended periods during the growing season, but unsaturated conditions prevail by the end of the season in most years. Surface water is typically absent, but may occur for a few days after heavy rain and upland runoff.

Riverine Classified Habitat NWI Map and Description



This 3.71 acre Riverine habitat is classified as a R4SBC

System Riverine (R) : The Riverine System includes all wetlands and deepwater habitats contained within a channel, with two exceptions: (1) wetlands dominated by trees, shrubs, persistent emergents, emergent mosses, or lichens, and (2) habitats with water containing ocean-derived salts of 0.5 ppt or greater. A channel is an open conduit either naturally or artificially created which periodically or continuously contains moving water, or which forms a connecting link between two bodies of standing water.

Subsystem Intermittent (4) : This Subsystem includes channels that contain flowing water only part of the year. When the water is not flowing, it may remain in isolated pools or surface water may be absent.

Subsystem of the Riverine System and all channels of the Estuarine System or of the Tidal Subsystem of the Riverine System that are completely dewatered at low tide.

Water Regime Seasonally Flooded (C) : Surface water is present for extended periods especially early in the growing season, but is absent by the end of the growing season in most years. The water table after flooding ceases is variable, extending from saturated to the surface to a water table well below the ground surface.

Appendix B
Wetland Field Data Sheets

B-1

U.S. Army Corps of Engineers WETLAND DETERMINATION DATA SHEET – Atlantic and Gulf Coastal Plain Region See ERDC/EL TR-10-20; the proponent agency is CECW-CO-R	OMB Control #: 0710-0024, Exp: 9/30/2027 Requirement Control Symbol EXEMPT: (Authority: AR 335-15, paragraph 5-2a)
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Project/Site: Waste Management Units 24 and 25 City/County: De Lisle/Harrison Sampling Date: 8/6/2025
Applicant/Owner: Chemours State: MS Sampling Point: DPU-1
Investigator(s): Larry Lewis, Jason Saucier Section, Township, Range: Section 33, Township 7 South, Range 13 West
Landform (hillside, terrace, etc.): hillslope Local relief (concave, convex, none): convex Slope (%): 2
Subregion (LRR or MLRA): LRR T, MLRA 152A Lat: 30.396302 Long: -89.299960 Datum: WGS84
Soil Map Unit Name: Poarch fine sandy loam, 2-5% slopes NWI classification: none
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No (If no, explain in Remarks.)
Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <u> </u> No <u>X</u>	Is the Sampled Area within a Wetland? Yes <u> </u> No <u>X</u>
Hydric Soil Present? Yes <u> </u> No <u>X</u>	
Wetland Hydrology Present? Yes <u> </u> No <u>X</u>	
Remarks: Sample point located in northeast area of the property near the former "man camp".	

HYDROLOGY

Wetland Hydrology Indicators:		Secondary Indicators (minimum of two required)	
Primary Indicators (minimum of one is required; check all that apply)			
<u> </u> Surface Water (A1)	<u> </u> Aquatic Fauna (B13)	<u> </u> Surface Soil Cracks (B6)	
<u> </u> High Water Table (A2)	<u> </u> Marl Deposits (B15) (LRR U)	<u> </u> Sparsely Vegetated Concave Surface (B8)	
<u> </u> Saturation (A3)	<u> </u> Hydrogen Sulfide Odor (C1)	<u> </u> Drainage Patterns (B10)	
<u> </u> Water Marks (B1)	<u> </u> Oxidized Rhizospheres on Living Roots (C3)	<u> </u> Moss Trim Lines (B16)	
<u> </u> Sediment Deposits (B2)	<u> </u> Presence of Reduced Iron (C4)	<u> </u> Dry-Season Water Table (C2)	
<u> </u> Drift Deposits (B3)	<u> </u> Recent Iron Reduction in Tilled Soils (C6)	<u> </u> Crayfish Burrows (C8)	
<u> </u> Algal Mat or Crust (B4)	<u> </u> Thin Muck Surface (C7)	<u> </u> Saturation Visible on Aerial Imagery (C9)	
<u> </u> Iron Deposits (B5)	<u> </u> Other (Explain in Remarks)	<u> </u> Geomorphic Position (D2)	
<u> </u> Inundation Visible on Aerial Imagery (B7)		<u> </u> Shallow Aquitard (D3)	
<u> </u> Water-Stained Leaves (B9)		<u> </u> FAC-Neutral Test (D5)	
		<u> </u> Sphagnum Moss (D8) (LRR T, U)	
Field Observations:			
Surface Water Present? Yes <u> </u> No <u>X</u>	Depth (inches): <u> </u>	Wetland Hydrology Present? Yes <u> </u> No <u>X</u>	
Water Table Present? Yes <u> </u> No <u>X</u>	Depth (inches): <u> </u>		
Saturation Present? Yes <u> </u> No <u>X</u>	Depth (inches): <u> </u>		
(includes capillary fringe)			
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:			
Remarks: FAC-Neutral is negative, 0:3.			

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: DPU-1

Tree Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Quercus virginiana</i>	20	Yes	FACU
2. <i>Quercus nigra</i>	10	Yes	FAC
3.			
4.			
5.			
6.			
7.			
8.			
30 = Total Cover			
50% of total cover: 15		20% of total cover: 6	
Sapling/Shrub Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Ligustrum sinense</i>	70	Yes	FAC
2.			
3.			
4.			
5.			
6.			
7.			
8.			
70 = Total Cover			
50% of total cover: 35		20% of total cover: 14	
Herb Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Ligustrum sinense</i>	2	No	FAC
2. <i>Senna obtusifolia</i>	1	No	FACU
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
3 = Total Cover			
50% of total cover: 2		20% of total cover: 1	
Woody Vine Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Pueraria montana</i>	10	Yes	FACU
2.			
3.			
4.			
5.			
10 = Total Cover			
50% of total cover: 5		20% of total cover: 2	

Remarks: (If observed, list morphological adaptations below.)

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 2 (A)

Total Number of Dominant Species Across All Strata: 4 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 50.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species 0	x 1 = 0
FACW species 0	x 2 = 0
FAC species 82	x 3 = 246
FACU species 31	x 4 = 124
UPL species 0	x 5 = 0
Column Totals: 113 (A)	370 (B)
Prevalence Index = B/A = 3.27	

Hydrophytic Vegetation Indicators:

1 - Rapid Test for Hydrophytic Vegetation

2 - Dominance Test is >50%

3 - Prevalence Index is ≤3.0¹

Problematic Hydrophytic Vegetation¹ (Explain)

¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody Vine – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes ☐ No ☒

Sampling Point: DPU-1

Atlantic and Gulf Coastal Plain – Version 2.0

U.S. Army Corps of Engineers		OMB Control #: 0710-0024, Exp: 9/30/2027 Requirement Control Symbol EXEMPT: (Authority: AR 335-15, paragraph 5-2a)	
WETLAND DETERMINATION DATA SHEET – Atlantic and Gulf Coastal Plain Region See ERDC/EL TR-10-20; the proponent agency is CECW-CO-R			
Project/Site: <u>Waste Management Units 24 and 25</u>		City/County: <u>De Lisle/Harrison</u>	
Applicant/Owner: <u>Chemours</u>		State: <u>MS</u> Sampling Point: <u>DPU-2</u>	
Investigator(s): <u>Larry Lewis, Jason Saucier</u>		Section, Township, Range: <u>Section 33, Township 7 South, Range 13 West</u>	
Landform (hillside, terrace, etc.): <u>hillslope</u>		Local relief (concave, convex, none): <u>convex</u> Slope (%): <u>2</u>	
Subregion (LRR or MLRA): <u>LRR T, MLRA 152A</u>		Lat: <u>30.392518</u> Long: <u>-89.300675</u> Datum: <u>WGS84</u>	
Soil Map Unit Name: <u>Poarch fine sandy loam, 5-12% slopes</u>		NW1 classification: <u>none</u>	
Are climatic / hydrologic conditions on the site typical for this time of year? Yes <u>X</u> No <u> </u> (If no, explain in Remarks.)			
Are Vegetation <u> </u> , Soil <u> </u> , or Hydrology <u> </u> significantly disturbed? Are "Normal Circumstances" present? Yes <u>X</u> No <u> </u>			
Are Vegetation <u> </u> , Soil <u> </u> , or Hydrology <u> </u> naturally problematic? (If needed, explain any answers in Remarks.)			
SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.			
Hydrophytic Vegetation Present? Yes <u>X</u> No <u> </u>		Is the Sampled Area within a Wetland? Yes <u> </u> No <u>X</u>	
Hydric Soil Present? Yes <u> </u> No <u>X</u>			
Wetland Hydrology Present? Yes <u> </u> No <u>X</u>			
Remarks: Sample point located near an access road in the south-central area of the property.			
HYDROLOGY			
Wetland Hydrology Indicators:		Secondary Indicators (minimum of two required)	
<u>Primary Indicators (minimum of one is required; check all that apply)</u>		<u>Surface Soil Cracks (B6)</u>	
<u> </u> Surface Water (A1)		<u> </u> Sparsely Vegetated Concave Surface (B8)	
<u> </u> High Water Table (A2)		<u> </u> Drainage Patterns (B10)	
<u> </u> Saturation (A3)		<u> </u> Moss Trim Lines (B16)	
<u> </u> Water Marks (B1)		<u> </u> Dry-Season Water Table (C2)	
<u> </u> Sediment Deposits (B2)		<u> </u> Crayfish Burrows (C8)	
<u> </u> Drift Deposits (B3)		<u> </u> Saturation Visible on Aerial Imagery (C9)	
<u> </u> Algal Mat or Crust (B4)		<u> </u> Geomorphic Position (D2)	
<u> </u> Iron Deposits (B5)		<u> </u> Shallow Aquitard (D3)	
<u> </u> Inundation Visible on Aerial Imagery (B7)		<u> </u> FAC-Neutral Test (D5)	
<u> </u> Water-Stained Leaves (B9)		<u> </u> Sphagnum Moss (D8) (LRR T, U)	
Field Observations:			
Surface Water Present? Yes <u> </u> No <u>X</u> Depth (inches): <u> </u>			
Water Table Present? Yes <u> </u> No <u>X</u> Depth (inches): <u> </u>			
Saturation Present? Yes <u> </u> No <u>X</u> Depth (inches): <u> </u>			
(includes capillary fringe)		Wetland Hydrology Present? Yes <u> </u> No <u>X</u>	
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:			
Remarks: FAC-Neutral negative, 0:2.			

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: DPU-2

Tree Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Quercus virginiana</i>	60	Yes	FACU
2. <i>Prunus serotina</i>	20	Yes	FACU
3. <i>Quercus nigra</i>	15	No	FAC
4.			
5.			
6.			
7.			
8.			
	95	=Total Cover	
50% of total cover:	48	20% of total cover:	19
Sapling/Shrub Stratum (Plot size: 30' radius)			
1. <i>Ligustrum sinense</i>	40	Yes	FAC
2. <i>Ilex vomitoria</i>	30	Yes	FAC
3. <i>Sambucus nigra</i>	1	No	FACW
4.			
5.			
6.			
7.			
8.			
	71	=Total Cover	
50% of total cover:	36	20% of total cover:	15
Herb Stratum (Plot size: 30' radius)			
1. <i>Ilex vomitoria</i>	5	Yes	FAC
2. <i>Lygodium japonicum</i>	2	Yes	FAC
3. <i>Triadica sebifera</i>	1	No	FAC
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
	8	=Total Cover	
50% of total cover:	4	20% of total cover:	2
Woody Vine Stratum (Plot size: 30' radius)			
1. <i>Vitis rotundifolia</i>	5	Yes	FAC
2. <i>Smilax sp.</i>	1	No	
3. <i>Toxicodendron radicans</i>	1	No	FAC
4.			
5.			
	7	=Total Cover	
50% of total cover:	4	20% of total cover:	2

Remarks: (If observed, list morphological adaptations below.)

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 5 (A)

Total Number of Dominant Species Across All Strata: 7 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 71.4% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species 0	x 1 = 0
FACW species 1	x 2 = 2
FAC species 99	x 3 = 297
FACU species 80	x 4 = 320
UPL species 0	x 5 = 0
Column Totals: 180 (A)	619 (B)
Prevalence Index = B/A = 3.44	

Hydrophytic Vegetation Indicators:

1 - Rapid Test for Hydrophytic Vegetation

X 2 - Dominance Test is >50%

3 - Prevalence Index is ≤3.0¹

Problematic Hydrophytic Vegetation¹ (Explain)

¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody Vine – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes X No

B-6

U.S. Army Corps of Engineers		OMB Control #: 0710-0024, Exp: 9/30/2027 Requirement Control Symbol EXEMPT: (Authority: AR 335-15, paragraph 5-2a)	
WETLAND DETERMINATION DATA SHEET – Atlantic and Gulf Coastal Plain Region See ERDC/EL TR-10-20; the proponent agency is CECW-CO-R			
Project/Site: <u>Waste Management Units 24 and 25</u>		City/County: <u>De Lisle/Harrison</u>	
Applicant/Owner: <u>Chemours</u>		State: <u>MS</u>	
Investigator(s): <u>Larry Lewis, Jason Saucier</u>		Section, Township, Range: <u>Section 33, Township 7 South, Range 13 West</u>	
Landform (hillside, terrace, etc.): <u>wet drain</u>		Local relief (concave, convex, none): <u>concave</u>	
Subregion (LRR or MLRA): <u>LRR T, MLRA 152A</u>		Slope (%): <u>5</u>	
Soil Map Unit Name: <u>Saucier fine sandy loam, 5-8% slopes</u>		Datum: <u>WGS84</u>	
Lat: <u>30.394635</u>		Long: <u>-89.301927</u>	
NW1 classification: <u>PFO1/3/B</u>			
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)			
Are Vegetation ☐ , Soil ☒ , or Hydrology ☐ significantly disturbed? Yes ☐ No ☒			
Are "Normal Circumstances" present? Yes ☐ No ☒			
Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)			
SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.			
Hydrophytic Vegetation Present? Yes ☒ No ☐		Is the Sampled Area within a Wetland? Yes ☒ No ☐	
Hydric Soil Present? Yes ☒ No ☐			
Wetland Hydrology Present? Yes ☒ No ☐			
Remarks: Sample point located within western wetland drain in the west-central area of the property. Previous sediment observed within soil profile from 0-6" below the surface.			
HYDROLOGY			
Wetland Hydrology Indicators:		Secondary Indicators (minimum of two required)	
<u>Primary Indicators (minimum of one is required; check all that apply)</u>		<u>Surface Soil Cracks (B6)</u>	
☐ Surface Water (A1)		☐ Sparsely Vegetated Concave Surface (B8)	
☐ High Water Table (A2)		☐ Drainage Patterns (B10)	
☐ Saturation (A3)		☐ Moss Trim Lines (B16)	
☒ Water Marks (B1)		☐ Dry-Season Water Table (C2)	
☐ Sediment Deposits (B2)		☒ Crayfish Burrows (C8)	
☒ Drift Deposits (B3)		☐ Saturation Visible on Aerial Imagery (C9)	
☐ Algal Mat or Crust (B4)		☐ Geomorphic Position (D2)	
☐ Iron Deposits (B5)		☐ Shallow Aquitard (D3)	
☐ Inundation Visible on Aerial Imagery (B7)		☒ FAC-Neutral Test (D5)	
☐ Water-Stained Leaves (B9)		☐ Sphagnum Moss (D8) (LRR T, U)	
Field Observations:			
Surface Water Present? Yes ☐ No ☒ Depth (inches):			
Water Table Present? Yes ☐ No ☒ Depth (inches):			
Saturation Present? Yes ☐ No ☒ Depth (inches):			
(includes capillary fringe)		Wetland Hydrology Present? Yes ☒ No ☐	
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:			
Remarks: FAC-Neutral positive, 5:0. Buttressed tree trunks observed.			

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: DPW-1

Tree Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Nyssa biflora</i>	60	Yes	OBL
2. <i>Magnolia virginiana</i>	30	Yes	FACW
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
90 = Total Cover			
50% of total cover: 45		20% of total cover: 18	
Sapling/Shrub Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Cyrilla racemiflora</i>	20	Yes	FACW
2. <i>Triadica sebifera</i>	5	No	FAC
3. <i>Ligustrum sinense</i>	5	No	FAC
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
30 = Total Cover			
50% of total cover: 15		20% of total cover: 6	
Herb Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <i>Triadica sebifera</i>	2	Yes	FAC
2. <i>Woodwardia areolata</i>	1	Yes	OBL
3. <i>Iris virginica</i>	1	Yes	OBL
4. unidentified sedge	1	Yes	
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
12. _____	_____	_____	_____
5 = Total Cover			
50% of total cover: 3		20% of total cover: 1	
Woody Vine Stratum (Plot size: 30' radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. none	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
= Total Cover			
50% of total cover: _____		20% of total cover: _____	

Remarks: (If observed, list morphological adaptations below.)

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 6 (A)

Total Number of Dominant Species Across All Strata: 7 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 85.7% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species 62	x 1 = 62
FACW species 50	x 2 = 100
FAC species 12	x 3 = 36
FACU species 0	x 4 = 0
UPL species 0	x 5 = 0
Column Totals: 124 (A)	198 (B)

Prevalence Index = B/A = 1.60

Hydrophytic Vegetation Indicators:

1 - Rapid Test for Hydrophytic Vegetation

X 2 - Dominance Test is >50%

X 3 - Prevalence Index is >3.0¹

Problematic Hydrophytic Vegetation¹ (Explain)

¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody Vine – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes X No

SOIL								Sampling Point: DPW-1
Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-6	10YR 5/4	90	7.5R 4/8	10	C	PL	Sandy	sediment
6-15	10YR 4/2	95	7.5R 4/6	5	C	PL	Loamy/Clayey	oxidized rhizospheres
15-20	10YR 4/1	90	7.5R 4/6	10	C	PL	Loamy/Clayey	oxidized rhizospheres
¹ Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.						² Location: PL=Pore Lining, M=Matrix.		
Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.) ☐ Histosol (A1) ☐ Thin Dark Surface (S9) (LRR S, T, U) ☐ Histic Epipedon (A2) ☐ Barrier Islands 1 cm Muck (S12) ☐ Black Histic (A3) (MLRA 153B, 153D) ☐ Hydrogen Sulfide (A4) ☐ Loamy Mucky Mineral (F1) (LRR O) ☐ Stratified Layers (A5) ☐ Loamy Gleyed Matrix (F2) ☐ Organic Bodies (A6) (LRR P, T, U) ☒ Depleted Matrix (F3) ☐ 5 cm Mucky Mineral (A7) (LRR P, T, U) ☐ Redox Dark Surface (F6) ☐ Muck Presence (A8) (LRR U) ☐ Depleted Dark Surface (F7) ☐ 1 cm Muck (A9) (LRR P, T) ☐ Redox Depressions (F8) ☐ Depleted Below Dark Surface (A11) ☐ Marl (F10) (LRR U) ☐ Thick Dark Surface (A12) ☐ Depleted Ochric (F11) (MLRA 151) ☐ Coast Prairie Redox (A16) (MLRA 150A) ☐ Iron-Manganese Masses (F12) (LRR O, P, T) ☐ Iron Monosulfide (A18) ☐ Umbric Surface (F13) (LRR P, T, U) ☐ Sandy Mucky Mineral (S1) (LRR O, S) ☐ Delta Ochric (F17) (MLRA 151) ☐ Sandy Gleyed Matrix (S4) ☐ Reduced Vertic (F18) (MLRA 150A, 150B) ☐ Sandy Redox (S5) ☐ Piedmont Floodplain Soils (F19) (MLRA 149A) ☐ Stripped Matrix (S6) ☐ Anomalous Bright Floodplain Soils (F20) ☐ Dark Surface (S7) (LRR P, S, T, U) (MLRA 149A, 153C, 153D) ☐ Polyvalue Below Surface (S8) ☐ Very Shallow Dark Surface (F22) ☐ (LRR S, T, U) (MLRA 138, 152A in FL, 154) Indicators for Problematic Hydric Soils³: ☐ 1 cm Muck (A9) (LRR O) ☐ 2 cm Muck (A10) (LRR S) ☐ Coast Prairie Redox (A16) (MLRA 149A) ☐ Reduced Vertic (F18) ☐ (outside MLRA 150A, 150B) ☐ Piedmont Floodplain Soils (F19) (LRR P, T) ☐ Anomalous Bright Floodplain Soils (F20) ☐ (MLRA 153B) ☐ Red Parent Material (F21) ☐ Very Shallow Dark Surface (F22) ☐ (outside MLRA 138, 152A in FL, 154) ☐ Other (Explain in Remarks)								
Restrictive Layer (if observed): Type: _____ Depth (inches): _____							Hydric Soil Present? Yes ☒ No ☐	
Remarks:								

U.S. Army Corps of Engineers		OMB Control #: 0710-0024, Exp: 9/30/2027 Requirement Control Symbol EXEMPT: (Authority: AR 335-15, paragraph 5-2a)	
WETLAND DETERMINATION DATA SHEET – Atlantic and Gulf Coastal Plain Region See ERDC/EL TR-10-20; the proponent agency is CECW-CO-R			
Project/Site: Waste Management Units 24 and 25		City/County: De Lisle/Harrison	
Applicant/Owner: Chemours		State: MS	
Investigator(s): Larry Lewis, Jason Saucier		Sampling Date: 8/6/2025	
Landform (hillside, terrace, etc.): wet drain		Section, Township, Range: Section 33, Township 7 South, Range 13 West	
Subregion (LRR or MLRA): LRR T, MLRA 152A		Slope (%): 2	
Soil Map Unit Name: Saucier fine sandy loam, 5-8% slopes		Local relief (concave, convex, none): concave	
Lat: 30.396338		Long: -89.299976	
Datum: WGS84		NW1 classification: PFO1/3B	
Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)			
Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐			
Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)			
SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.			
Hydrophytic Vegetation Present? Yes ☒ No ☐		Is the Sampled Area within a Wetland? Yes ☒ No ☐	
Hydric Soil Present? Yes ☒ No ☐			
Wetland Hydrology Present? Yes ☒ No ☐			
Remarks: Sample point located in northeast area of the property near the former "man camp".			
HYDROLOGY			
Wetland Hydrology Indicators:		Secondary Indicators (minimum of two required)	
Primary Indicators (minimum of one is required; check all that apply)			
☐ Surface Water (A1)		☐ Surface Soil Cracks (B6)	
☐ High Water Table (A2)		☐ Sparsely Vegetated Concave Surface (B8)	
☐ Saturation (A3)		☐ Drainage Patterns (B10)	
☐ Water Marks (B1)		☐ Moss Trim Lines (B16)	
☐ Sediment Deposits (B2)		☐ Dry-Season Water Table (C2)	
☒ Drift Deposits (B3)		☒ Crayfish Burrows (C8)	
☐ Algal Mat or Crust (B4)		☐ Saturation Visible on Aerial Imagery (C9)	
☐ Iron Deposits (B5)		☐ Geomorphic Position (D2)	
☐ Inundation Visible on Aerial Imagery (B7)		☐ Shallow Aquitard (D3)	
☒ Water-Stained Leaves (B9)		☒ FAC-Neutral Test (D5)	
☐ Aquatic Fauna (B13)		☐ Sphagnum Moss (D8) (LRR T, U)	
☐ Marl Deposits (B15) (LRR U)			
☐ Hydrogen Sulfide Odor (C1)			
☐ Oxidized Rhizospheres on Living Roots (C3)			
☐ Presence of Reduced Iron (C4)			
☐ Recent Iron Reduction in Tilled Soils (C6)			
☐ Thin Muck Surface (C7)			
☐ Other (Explain in Remarks)			
Field Observations:			
Surface Water Present? Yes ☐ No ☒ Depth (inches):			
Water Table Present? Yes ☐ No ☒ Depth (inches):			
Saturation Present? Yes ☐ No ☒ Depth (inches):			
(includes capillary fringe)		Wetland Hydrology Present? Yes ☒ No ☐	
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:			
Remarks: FAC-Neutral is positive, 4:0.			

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: DPW-2

Tree Stratum (Plot size: <u>30'</u> radius)	Absolute % Cover	Dominant Species?	Indicator Status
1. <u>Nyssa biflora</u>	<u>40</u>	<u>Yes</u>	<u>OBL</u>
2. <u>Magnolia virginiana</u>	<u>40</u>	<u>Yes</u>	<u>FACW</u>
3. <u>Acer rubrum</u>	<u>5</u>	<u>No</u>	<u>FAC</u>
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
	<u>85</u> =Total Cover		
50% of total cover: <u>43</u>		20% of total cover: <u>17</u>	
Sapling/Shrub Stratum (Plot size: <u>30'</u> radius)			
1. <u>Ligustrum sinense</u>	<u>15</u>	<u>Yes</u>	<u>FAC</u>
2. <u>Acer rubrum</u>	<u>5</u>	<u>Yes</u>	<u>FAC</u>
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
	<u>20</u> =Total Cover		
50% of total cover: <u>10</u>		20% of total cover: <u>4</u>	
Herb Stratum (Plot size: <u>30'</u> radius)			
1. <u>Ligustrum sinense</u>	<u>5</u>	<u>Yes</u>	<u>FAC</u>
2. <u>Woodwardia areolata</u>	<u>5</u>	<u>Yes</u>	<u>OBL</u>
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
12. _____	_____	_____	_____
	<u>10</u> =Total Cover		
50% of total cover: <u>5</u>		20% of total cover: <u>2</u>	
Woody Vine Stratum (Plot size: <u>30'</u> radius)			
1. <u>Vitis rotundifolia</u>	<u>5</u>	<u>Yes</u>	<u>FAC</u>
2. <u>Smilax laurifolia</u>	<u>2</u>	<u>Yes</u>	<u>FACW</u>
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
	<u>7</u> =Total Cover		
50% of total cover: <u>4</u>		20% of total cover: <u>2</u>	

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 8 (A)

Total Number of Dominant Species Across All Strata: 8 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>45</u>	x 1 = <u>45</u>
FACW species <u>42</u>	x 2 = <u>84</u>
FAC species <u>35</u>	x 3 = <u>105</u>
FACU species <u>0</u>	x 4 = <u>0</u>
UPL species <u>0</u>	x 5 = <u>0</u>
Column Totals: <u>122</u> (A)	<u>234</u> (B)

Prevalence Index = B/A = 1.92

Hydrophytic Vegetation Indicators:

1 - Rapid Test for Hydrophytic Vegetation

☒ 2 - Dominance Test is >50%

☒ 3 - Prevalence Index is ≤3.0¹

 Problematic Hydrophytic Vegetation¹ (Explain)

¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody Vine – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes ☒ No ☐

Remarks: (If observed, list morphological adaptations below.)

SOIL

Sampling Point: DPW-2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-2	10YR 3/2	98	7.5R 3/4	2	C	PL	Sandy	oxidized rhizospheres
2-12	10YR 4/2	90	7.5R 3/4	10	C	PL	Sandy	oxidized rhizospheres
12-20	10YR 4/2	90	7.5R 3/4	10	C	PL	Loamy/Clayey	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

☐ Histosol (A1)	☐ Thin Dark Surface (S9) (LRR S, T, U)
☐ Histic Epipedon (A2)	☐ Barrier Islands 1 cm Muck (S12)
☐ Black Histic (A3)	☐ (MLRA 153B, 153D)
☐ Hydrogen Sulfide (A4)	☐ Loamy Mucky Mineral (F1) (LRR O)
☐ Stratified Layers (A5)	☐ Loamy Gleyed Matrix (F2)
☐ Organic Bodies (A6) (LRR P, T, U)	☐ Depleted Matrix (F3)
☐ 5 cm Mucky Mineral (A7) (LRR P, T, U)	☐ Redox Dark Surface (F6)
☐ Muck Presence (A8) (LRR U)	☐ Depleted Dark Surface (F7)
☐ 1 cm Muck (A9) (LRR P, T)	☐ Redox Depressions (F8)
☐ Depleted Below Dark Surface (A11)	☐ Marl (F10) (LRR U)
☐ Thick Dark Surface (A12)	☐ Depleted Ochric (F11) (MLRA 151)
☐ Coast Prairie Redox (A16) (MLRA 150A)	☐ Iron-Manganese Masses (F12) (LRR O, P, T)
☐ Iron Monosulfide (A18)	☐ Umbric Surface (F13) (LRR P, T, U)
☐ Sandy Mucky Mineral (S1) (LRR O, S)	☐ Delta Ochric (F17) (MLRA 151)
☐ Sandy Gleyed Matrix (S4)	☐ Reduced Vertic (F18) (MLRA 150A, 150B)
☒ Sandy Redox (S5)	☐ Piedmont Floodplain Soils (F19) (MLRA 149A)
☐ Stripped Matrix (S6)	☐ Anomalous Bright Floodplain Soils (F20)
☐ Dark Surface (S7) (LRR P, S, T, U)	☐ (MLRA 149A, 153C, 153D)
☐ Polyvalue Below Surface (S8)	☐ Very Shallow Dark Surface (F22)
☐ (LRR S, T, U)	☐ (MLRA 138, 152A in FL, 154)

Indicators for Problematic Hydric Soils³:

☐ 1 cm Muck (A9) (LRR O)
☐ 2 cm Muck (A10) (LRR S)
☐ Coast Prairie Redox (A16) (MLRA 149A)
☐ Reduced Vertic (F18)
☐ (outside MLRA 150A, 150B)
☐ Piedmont Floodplain Soils (F19) (LRR P, T)
☐ Anomalous Bright Floodplain Soils (F20)
☐ (MLRA 153B)
☐ Red Parent Material (F21)
☐ Very Shallow Dark Surface (F22)
☐ (outside MLRA 138, 152A in FL, 154)
☐ Other (Explain in Remarks)

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____
Depth (inches): _____

Hydric Soil Present? Yes ☒ No ☐

Remarks:

U.S. Army Corps of Engineers WETLAND DETERMINATION DATA SHEET – Atlantic and Gulf Coastal Plain Region See ERDC/EL TR-10-20; the proponent agency is CECW-CO-R	OMB Control #: 0710-0024, Exp: 9/30/2027 Requirement Control Symbol EXEMPT: (Authority: AR 335-15, paragraph 5-2a)
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Project/Site: Waste Management Units 24 and 25 City/County: De Lisle/Harrison Sampling Date: 8/6/25
Applicant/Owner: Chemours State: MS Sampling Point: DPW-3
Investigator(s): Larry Lewis, Jason Saucier Section, Township, Range: Section 33, Township 7 South, Range 13 West
Landform (hillside, terrace, etc.): wet drain Local relief (concave, convex, none): concave Slope (%): 5
Subregion (LRR or MLRA): LRR T, MLRA 152A Lat: 30.394082 Long: -89.303228 Datum: WGS84
Soil Map Unit Name: Saucier fine sandy loam, 5-8% slopes NWI classification: PFO1/3B

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No (If no, explain in Remarks.)
Are Vegetation , Soil X, or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No X
Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <u>X</u> No <u> </u>	Is the Sampled Area within a Wetland? Yes <u>X</u> No <u> </u>
Hydric Soil Present? Yes <u>X</u> No <u> </u>	
Wetland Hydrology Present? Yes <u>X</u> No <u> </u>	

Remarks:

Sample point located in southwest area of the property. Previous sediment observed within the upper 2" of soil profile.

HYDROLOGY

Wetland Hydrology Indicators: <u>Primary Indicators (minimum of one is required; check all that apply)</u> <u> </u> Surface Water (A1) <u> </u> Aquatic Fauna (B13) <u> </u> High Water Table (A2) <u> </u> Marl Deposits (B15) (LRR U) <u> </u> Saturation (A3) <u> </u> Hydrogen Sulfide Odor (C1) <u> </u> Water Marks (B1) <u>X</u> Oxidized Rhizospheres on Living Roots (C3) <u> </u> Sediment Deposits (B2) <u> </u> Presence of Reduced Iron (C4) <u>X</u> Drift Deposits (B3) <u> </u> Recent Iron Reduction in Tilled Soils (C6) <u> </u> Algal Mat or Crust (B4) <u> </u> Thin Muck Surface (C7) <u> </u> Iron Deposits (B5) <u> </u> Other (Explain in Remarks) <u> </u> Inundation Visible on Aerial Imagery (B7) <u>X</u> Water-Stained Leaves (B9)	<u>Secondary Indicators (minimum of two required)</u> <u> </u> Surface Soil Cracks (B6) <u> </u> Sparsely Vegetated Concave Surface (B8) <u> </u> Drainage Patterns (B10) <u> </u> Moss Trim Lines (B16) <u> </u> Dry-Season Water Table (C2) <u> </u> Crayfish Burrows (C8) <u> </u> Saturation Visible on Aerial Imagery (C9) <u> </u> Geomorphic Position (D2) <u> </u> Shallow Aquitard (D3) <u>X</u> FAC-Neutral Test (D5) <u> </u> Sphagnum Moss (D8) (LRR T, U)
---	--

Field Observations: Surface Water Present? Yes <u> </u> No <u>X</u> Depth (inches): <u> </u> Water Table Present? Yes <u> </u> No <u>X</u> Depth (inches): <u>15</u> Saturation Present? Yes <u> </u> No <u>X</u> Depth (inches): <u> </u> (includes capillary fringe)	Wetland Hydrology Present? Yes <u>X</u> No <u> </u>
--	---

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

FAC-Neutral is positive, 5:0. Buttressed tree trunks observed.

VEGETATION (Four Strata) – Use scientific names of plants.

Sampling Point: DPW-3

Tree Stratum (Plot size: <u>20' radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. <u>Nyssa biflora</u>	<u>40</u>	<u>Yes</u>	<u>OBL</u>
2. <u>Magnolia virginiana</u>	<u>40</u>	<u>Yes</u>	<u>FACW</u>
3. <u>Ilex opaca</u>	<u>5</u>	<u>No</u>	<u>FAC</u>
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
	<u>85</u> =Total Cover		
50% of total cover: <u>43</u>		20% of total cover: <u>17</u>	
Sapling/Shrub Stratum (Plot size: <u>20' radius</u>)			
1. <u>Magnolia virginiana</u>	<u>20</u>	<u>Yes</u>	<u>FACW</u>
2. <u>Ilex vomitoria</u>	<u>15</u>	<u>Yes</u>	<u>FAC</u>
3. <u>Quercus nigra</u>	<u>10</u>	<u>No</u>	<u>FAC</u>
4. <u>Morella cerifera</u>	<u>5</u>	<u>No</u>	<u>FAC</u>
5. <u>Cyrilla racemiflora</u>	<u>2</u>	<u>No</u>	<u>FACW</u>
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
	<u>52</u> =Total Cover		
50% of total cover: <u>26</u>		20% of total cover: <u>11</u>	
Herb Stratum (Plot size: <u>20' radius</u>)			
1. <u>Woodwardia areolata</u>	<u>10</u>	<u>Yes</u>	<u>OBL</u>
2. <u>Ligustrum sinense</u>	<u>2</u>	<u>No</u>	<u>FAC</u>
3. <u>Ilex opaca</u>	<u>1</u>	<u>No</u>	<u>FAC</u>
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
12. _____	_____	_____	_____
	<u>13</u> =Total Cover		
50% of total cover: <u>7</u>		20% of total cover: <u>3</u>	
Woody Vine Stratum (Plot size: <u>20' radius</u>)			
1. <u>Vitis rotundifolia</u>	<u>2</u>	<u>Yes</u>	<u>FAC</u>
2. <u>Smilax laurifolia</u>	<u>2</u>	<u>Yes</u>	<u>FACW</u>
3. <u>Toxicodendron radicans</u>	<u>2</u>	<u>Yes</u>	<u>FAC</u>
4. _____	_____	_____	_____
5. _____	_____	_____	_____
	<u>6</u> =Total Cover		
50% of total cover: <u>3</u>		20% of total cover: <u>2</u>	

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 8 (A)

Total Number of Dominant Species Across All Strata: 8 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>50</u>	x 1 = <u>50</u>
FACW species <u>64</u>	x 2 = <u>128</u>
FAC species <u>42</u>	x 3 = <u>126</u>
FACU species <u>0</u>	x 4 = <u>0</u>
UPL species <u>0</u>	x 5 = <u>0</u>
Column Totals: <u>156</u> (A)	<u>304</u> (B)
Prevalence Index = B/A = <u>1.95</u>	

Hydrophytic Vegetation Indicators:

1 - Rapid Test for Hydrophytic Vegetation

☒ 2 - Dominance Test is >50%

☒ 3 - Prevalence Index is ≤3.0¹

_____ Problematic Hydrophytic Vegetation¹ (Explain)

¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

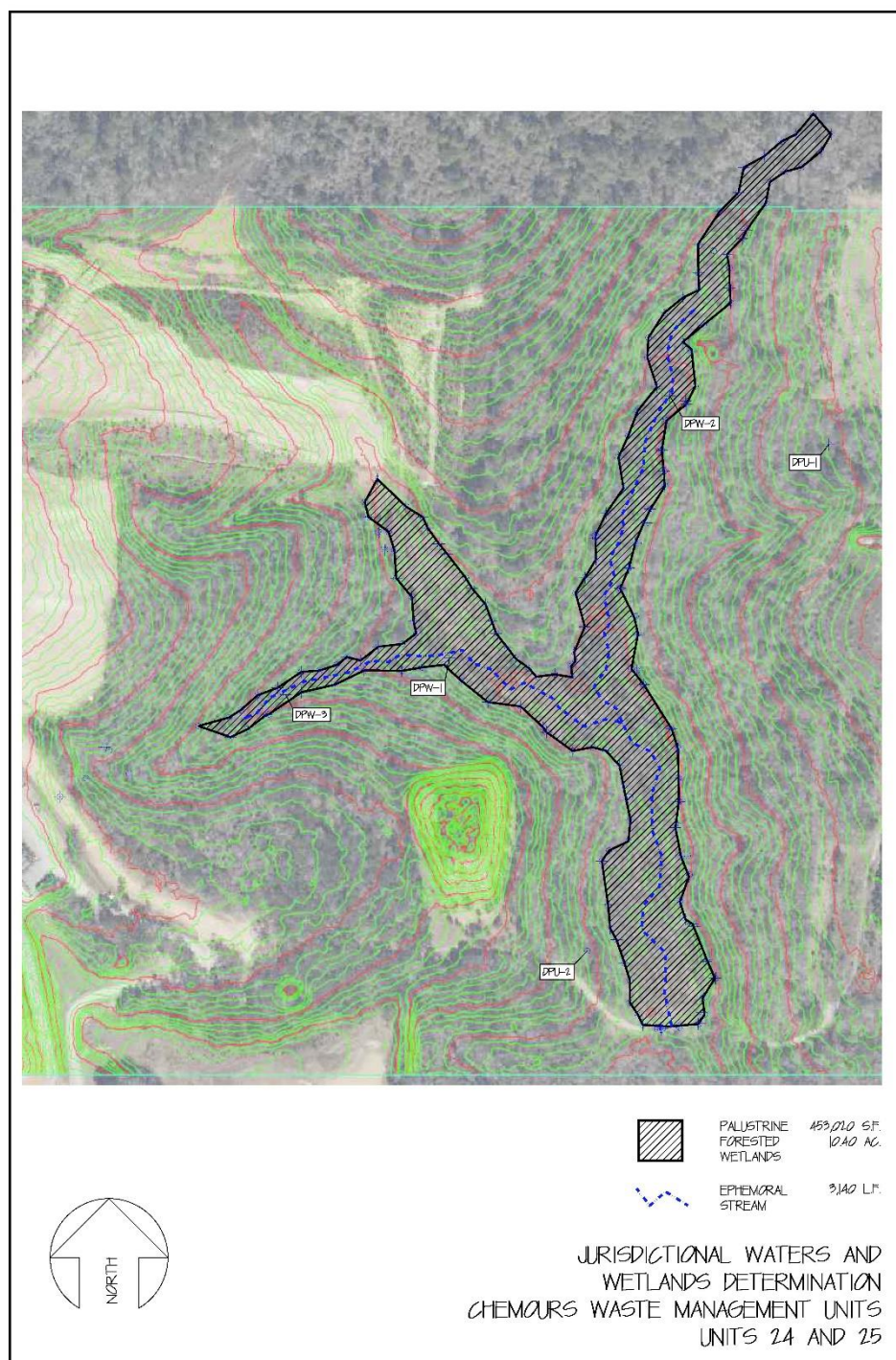
Woody Vine – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes ☒ No ☐

Remarks: (If observed, list morphological adaptations below.)

U.S. Army Corps of Engineers		OMB Control #: 0710-0024, Exp: 9/30/2027 Requirement Control Symbol EXEMPT: (Authority: AR 335-15, paragraph 5-2a)	
WETLAND DETERMINATION DATA SHEET – Atlantic and Gulf Coastal Plain Region See ERDC/EL TR-10-20; the proponent agency is CECW-CO-R			
Project/Site: <u>Waste Management Units 24 and 25</u>		City/County: <u>De Lisle/Harrison</u>	
Applicant/Owner: <u>Chemours</u>		State: <u>MS</u>	
Investigator(s): <u>Larry Lewis, Jason Saucier</u>		Section, Township, Range: <u>Section 33, Township 7 South, Range 13 West</u>	
Landform (hillside, terrace, etc.): <u>wet drain</u>		Local relief (concave, convex, none): <u>concave</u>	
Subregion (LRR or MLRA): <u>LRR T, MLRA 152A</u>		Slope (%): <u>5</u>	
Soil Map Unit Name: <u>Saucier fine sandy loam, 5-8% slopes</u>		Lat: <u>30.394082</u>	
		Long: <u>-89.303228</u>	
		Datum: <u>WGS84</u>	
		NW1 classification: <u>PFO1/3B</u>	
Are climatic / hydrologic conditions on the site typical for this time of year? Yes <u>X</u> No <u> </u> (If no, explain in Remarks.)			
Are Vegetation <u> </u> , Soil <u>X</u> , or Hydrology <u> </u> significantly disturbed? Are "Normal Circumstances" present? Yes <u> </u> No <u>X</u>			
Are Vegetation <u> </u> , Soil <u> </u> , or Hydrology <u> </u> naturally problematic? (If needed, explain any answers in Remarks.)			
SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.			
Hydrophytic Vegetation Present? Yes <u>X</u> No <u> </u>		Is the Sampled Area within a Wetland? Yes <u>X</u> No <u> </u>	
Hydric Soil Present? Yes <u>X</u> No <u> </u>			
Wetland Hydrology Present? Yes <u>X</u> No <u> </u>			
Remarks: Sample point located in southwest area of the property. Previous sediment observed within the upper 2" of soil profile.			
HYDROLOGY			
Wetland Hydrology Indicators:		Secondary Indicators (minimum of two required)	
Primary Indicators (minimum of one is required; check all that apply)			
<u> </u> Surface Water (A1)		<u> </u> Surface Soil Cracks (B6)	
<u> </u> High Water Table (A2)		<u> </u> Sparsely Vegetated Concave Surface (B8)	
<u> </u> Saturation (A3)		<u> </u> Drainage Patterns (B10)	
<u> </u> Water Marks (B1)		<u> </u> Moss Trim Lines (B16)	
<u> </u> Sediment Deposits (B2)		<u> </u> Dry-Season Water Table (C2)	
<u>X</u> Drift Deposits (B3)		<u> </u> Crayfish Burrows (C8)	
<u> </u> Algal Mat or Crust (B4)		<u> </u> Saturation Visible on Aerial Imagery (C9)	
<u> </u> Iron Deposits (B5)		<u> </u> Geomorphic Position (D2)	
<u> </u> Inundation Visible on Aerial Imagery (B7)		<u> </u> Shallow Aquitard (D3)	
<u>X</u> Water-Stained Leaves (B9)		<u>X</u> FAC-Neutral Test (D5)	
		<u> </u> Sphagnum Moss (D8) (LRR T, U)	
Field Observations:			
Surface Water Present? Yes <u> </u> No <u>X</u>		Depth (inches): <u> </u>	
Water Table Present? Yes <u> </u> No <u>X</u>		Depth (inches): <u>15</u>	
Saturation Present? Yes <u> </u> No <u>X</u>		Depth (inches): <u> </u>	
(includes capillary fringe)		Wetland Hydrology Present? Yes <u>X</u> No <u> </u>	
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:			
Remarks: FAC-Neutral is positive, 5:0. Buttressed tree trunks observed.			

Appendix C Wetland Study Area and Findings



Appendix D
APPROVED JURISDICTIONAL
DETERMINATION FORM U.S. Army
Corps of Engineers

APPROVED JURISDICTIONAL DETERMINATION FORM
U.S. Army Corps of Engineers

This form should be completed by following the instructions provided in Section IV of the JD Form Instructional Guidebook.

SECTION I: BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR APPROVED JURISDICTIONAL DETERMINATION (JD): September 12, 2025

B. DISTRICT OFFICE, FILE NAME, AND NUMBER: Mobile District

C. PROJECT LOCATION AND BACKGROUND INFORMATION:

State: Mississippi County/parish/borough: Harrison City: Pass Christian
Center coordinates of site (lat/long in degree decimal format): Lat. 30.394631° **N**, Long. 89.300611° **W**.
Universal Transverse Mercator:

Name of nearest waterbody: St. Louis Bay

Name of nearest Traditional Navigable Water (TNW) into which the aquatic resource flows: St. Louis Bay

Name of watershed or Hydrologic Unit Code (HUC): 12-031700090603

☒ Check if map/diagram of review area and/or potential jurisdictional areas is/are available upon request.

☐ Check if other sites (e.g., offsite mitigation sites, disposal sites, etc...) are associated with this action and are recorded on a different JD form.

D. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):

☐ Office (Desk) Determination. Date:

☐ Field Determination. Date(s):

SECTION II: SUMMARY OF FINDINGS

A. RHA SECTION 10 DETERMINATION OF JURISDICTION.

There **Are no** "navigable waters of the U.S." within Rivers and Harbors Act (RHA) jurisdiction (as defined by 33 CFR part 329) in the review area. [Required]

☐ Waters subject to the ebb and flow of the tide.

☐ Waters are presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce.

Explain: .

B. CWA SECTION 404 DETERMINATION OF JURISDICTION.

There **are and are not** "waters of the U.S." within Clean Water Act (CWA) jurisdiction (as defined by 33 CFR part 328) in the review area. [Required]

1. Waters of the U.S.

a. Indicate presence of waters of U.S. in review area (check all that apply):¹

- ☐ TNWs, including territorial seas
- ☐ Wetlands adjacent to TNWs
- ☐ Relatively permanent waters² (RPWs) that flow directly or indirectly into TNWs
- ☒ Non-RPWs that flow directly or indirectly into TNWs
- ☐ Wetlands directly abutting RPWs that flow directly or indirectly into TNWs
- ☐ Wetlands adjacent to but not directly abutting RPWs that flow directly or indirectly into TNWs
- ☐ Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs
- ☐ Impoundments of jurisdictional waters
- ☐ Isolated (interstate or intrastate) waters, including isolated wetlands

b. Identify (estimate) size of waters of the U.S. in the review area:

Non-wetland waters: linear feet: width (ft) and/or acres.

Wetlands: acres.

c. Limits (boundaries) of jurisdiction based on: 1987 Delineation Manual

Elevation of established OHWM (if known): .

2. Non-regulated waters/wetlands (check if applicable):³

- ☒ Potentially jurisdictional waters and/or wetlands were assessed within the review area and determined to be not jurisdictional.
Explain: **One palustrine wetland polygon and three ephemeral stream segments were identified during a September 2025 wetland delineation. The wetland area abuts the onsite streams which flow into three culverts situated under a dirt/gravel service road along the southern limit of the delineation area. The culverts drain south into an ephemeral stream which continues to flow south. The road and culverts sever direct/continuous surface connection between onsite wetlands and ephemeral streams and any downstream RPW or TNW. Onsite streams were observed during June and**

¹ Boxes checked below shall be supported by completing the appropriate sections in Section III below.

² For purposes of this form, an RPW is defined as a tributary that is not a TNW and that typically flows year-round or has continuous flow at least "seasonally" (e.g., typically 3 months).

³ Supporting documentation is presented in Section III.F.

SECTION III: CWA ANALYSIS

A. TNWs AND WETLANDS ADJACENT TO TNWs

The agencies will assert jurisdiction over TNWs and wetlands adjacent to TNWs. If the aquatic resource is a TNW, complete Section III.A.1 and Section III.D.1. only; if the aquatic resource is a wetland adjacent to a TNW, complete Sections III.A.1 and 2 and Section III.D.1.; otherwise, see Section III.B below.

1. TNW

Identify TNW: N/A.

Summarize rationale supporting determination: .

2. Wetland adjacent to TNW

Summarize rationale supporting conclusion that wetland is “adjacent”: N/A.

B. CHARACTERISTICS OF TRIBUTARY (THAT IS NOT A TNW) AND ITS ADJACENT WETLANDS (IF ANY):

This section summarizes information regarding characteristics of the tributary and its adjacent wetlands, if any, and it helps determine whether or not the standards for jurisdiction established under *Rapanos* have been met.

The agencies will assert jurisdiction over non-navigable tributaries of TNWs where the tributaries are “relatively permanent waters” (RPWs), i.e. tributaries that typically flow year-round or have continuous flow at least seasonally (e.g., typically 3 months). A wetland that directly abuts an RPW is also jurisdictional. If the aquatic resource is not a TNW, but has year-round (perennial) flow, skip to Section III.D.2. If the aquatic resource is a wetland directly abutting a tributary with perennial flow, skip to Section III.D.4.

A wetland that is adjacent to but that does not directly abut an RPW requires a significant nexus evaluation. Corps districts and EPA regions will include in the record any available information that documents the existence of a significant nexus between a relatively permanent tributary that is not perennial (and its adjacent wetlands if any) and a traditional navigable water, even though a significant nexus finding is not required as a matter of law.

If the waterbody⁴ is not an RPW, or a wetland directly abutting an RPW, a JD will require additional data to determine if the waterbody has a significant nexus with a TNW. If the tributary has adjacent wetlands, the significant nexus evaluation must consider the tributary in combination with all of its adjacent wetlands. This significant nexus evaluation that combines, for analytical purposes, the tributary and all of its adjacent wetlands is used whether the review area identified in the JD request is the tributary, or its adjacent wetlands, or both. If the JD covers a tributary with adjacent wetlands, complete Section III.B.1 for the tributary, Section III.B.2 for any onsite wetlands, and Section III.B.3 for all wetlands adjacent to that tributary, both onsite and offsite. The determination whether a significant nexus exists is determined in Section III.C below.

1. Characteristics of non-TNWs that flow directly or indirectly into TNW

(i) General Area Conditions:

Watershed size: 15,229.88 **acres**

Drainage area: ~300 **acres**

Average annual rainfall: 62.36 inches

Average annual snowfall: 0 inches

(ii) Physical Characteristics:

(a) Relationship with TNW:

☐ Tributary flows directly into TNW.

☒ Tributary flows through **3** tributaries before entering TNW.

Project waters are **2-5** river miles from TNW.

Project waters are **1 (or less)** river miles from RPW.

Project waters are **2-5** aerial (straight) miles from TNW.

Project waters are **1 (or less)** aerial (straight) miles from RPW.

Project waters cross or serve as state boundaries. Explain: No.

Identify flow route to TNW⁵: Two 1st order streams and one 2nd order ephemeral streams exist onsite. The 2nd order stream drain into three culverts located under a service road. The culverts drain into an ephemeral stream south of the

⁴ Note that the Instructional Guidebook contains additional information regarding swales, ditches, washes, and erosional features generally and in the arid West.

⁵ Flow route can be described by identifying, e.g., tributary a, which flows through the review area, to flow into tributary b, which then flows into TNW.

survey area which discharges into a series of tributaries and through culverts under public roads and levies within the Chemours industrial facility. Based on review of arials it appears that some segments of these tributaries have been relocated and channelized for drainage purposes. They eventually flow into an unnamed bayou of the St. Louis Bay. Tributary stream order, if known: 1st and 2nd order.

(b) General Tributary Characteristics (check all that apply):

Tributary is: ☒ Natural
☐ Artificial (man-made). Explain: .
☐ Manipulated (man-altered). Explain: .

Tributary properties with respect to top of bank (estimate):

Average width: 3 feet
Average depth: >1 feet
Average side slopes: **3:1**.

Primary tributary substrate composition (check all that apply):

☐ Silts ☒ Sands ☐ Concrete
☐ Cobbles ☐ Gravel ☒ Muck
☐ Bedrock ☐ Vegetation. Type/% cover:
☐ Other. Explain: .

Tributary condition/stability [e.g., highly eroding, sloughing banks]. Explain: Stable.

Presence of run/riffle/pool complexes. Explain: No, the tributary was dry and not flowing at the time of site reconnaissance.

Tributary geometry: **Meandering**

Tributary gradient (approximate average slope): 1 %

(c) Flow:

Tributary provides for: **Ephemeral flow**

Estimate average number of flow events in review area/year: **20 (or greater)**

Describe flow regime: Flow occurs during and immediately following rain events.

Other information on duration and volume: unknown.

Surface flow is: **Confined**. Characteristics: .

Subsurface flow: **Unknown**. Explain findings: .

☐ Dye (or other) test performed: .

Tributary has (check all that apply):

☒ Bed and banks
☐ OHWM⁶ (check all indicators that apply):
☐ clear, natural line impressed on the bank ☐ the presence of litter and debris
☐ changes in the character of soil ☐ destruction of terrestrial vegetation
☐ shelving ☐ the presence of wrack line
☐ vegetation matted down, bent, or absent ☐ sediment sorting
☐ leaf litter disturbed or washed away ☐ scour
☐ sediment deposition ☐ multiple observed or predicted flow events
☐ water staining ☐ abrupt change in plant community
☐ other (list):
☐ Discontinuous OHWM.⁷ Explain: .

If factors other than the OHWM were used to determine lateral extent of CWA jurisdiction (check all that apply):

☒ High Tide Line indicated by: ☐ Mean High Water Mark indicated by:
☐ oil or scum line along shore objects ☐ survey to available datum;
☐ fine shell or debris deposits (foreshore) ☐ physical markings;
☐ physical markings/characteristics ☐ vegetation lines/changes in vegetation types.
☐ tidal gauges
☐ other (list):

(iii) **Chemical Characteristics:**

⁶A natural or man-made discontinuity in the OHWM does not necessarily sever jurisdiction (e.g., where the stream temporarily flows underground, or where the OHWM has been removed by development or agricultural practices). Where there is a break in the OHWM that is unrelated to the waterbody's flow regime (e.g., flow over a rock outcrop or through a culvert), the agencies will look for indicators of flow above and below the break.

⁷Ibid.

Characterize tributary (e.g., water color is clear, discolored, oily film; water quality; general watershed characteristics, etc.).

Explain: water was not present in the tributary at the time of site reconnaissance. The watershed includes previously disturbed forested areas (household rubbish observed), forestry mowed areas, and low-density residential development.

Identify specific pollutants, if known: unknown.

(iv) **Biological Characteristics. Channel supports (check all that apply):**

- ☐ Riparian corridor. Characteristics (type, average width): .
- ☒ Wetland fringe. Characteristics: palustrine wetlands were observed within the subject property along the tributary.
- ☐ Habitat for:
 - ☐ Federally Listed species. Explain findings: .
 - ☐ Fish/spawn areas. Explain findings: .
 - ☐ Other environmentally-sensitive species. Explain findings: .
 - ☐ Aquatic/wildlife diversity. Explain findings: .

2. **Characteristics of wetlands adjacent to non-TNW that flow directly or indirectly into TNW**

(i) **Physical Characteristics:**

(a) General Wetland Characteristics:

Properties:

Wetland size: 1.21 acres

Wetland type. Explain: palustrine.

Wetland quality. Explain: medium; WRAP score of ~67% was determined for wetlands.

Project wetlands cross or serve as state boundaries. Explain: .

(b) General Flow Relationship with Non-TNW:

Flow is: **Ephemeral flow**. Explain: .

Surface flow is: **Not present**

Characteristics: No surface water was observed at the time of site reconnaissance. Surface flow into non-TNW could occur during and following rain events.

Subsurface flow: **Unknown**. Explain findings: .

☐ Dye (or other) test performed: .

(c) Wetland Adjacency Determination with Non-TNW:

☒ Directly abutting

☒ Not directly abutting

☐ Discrete wetland hydrologic connection. Explain: One wetland - Wetland 2 - abuts the Non-TNW and two wetlands - Wetland Areas 3 and 4 - do not abut the non-TNW and are separated by natural uplands.

☐ Ecological connection. Explain: .

☐ Separated by berm/barrier. Explain: .

(d) Proximity (Relationship) to TNW

Project wetlands are **2-5** river miles from TNW.

Project waters are **2-5** aerial (straight) miles from TNW.

Flow is from: **No Flow**.

Estimate approximate location of wetland as within the **20 - 50-year** floodplain.

(ii) **Chemical Characteristics:**

Characterize wetland system (e.g., water color is clear, brown, oil film on surface; water quality; general watershed characteristics; etc.). Explain: water was not present at the time of site reconnaissance. The watershed includes previously disturbed forested areas (household rubbish observed), forestry mowed areas, and low-density residential development.

Identify specific pollutants, if known: unknown.

(iii) **Biological Characteristics. Wetland supports (check all that apply):**

- ☐ Riparian buffer. Characteristics (type, average width): .
- ☐ Vegetation type/percent cover. Explain: .
- ☐ Habitat for:
 - ☐ Federally Listed species. Explain findings: .
 - ☐ Fish/spawn areas. Explain findings: .
 - ☐ Other environmentally-sensitive species. Explain findings: .
 - ☐ Aquatic/wildlife diversity. Explain findings: .

3. **Characteristics of all wetlands adjacent to the tributary (if any)**

All wetland(s) being considered in the cumulative analysis: **3**

Approximately (1.21) acres in total are being considered in the cumulative analysis.

For each wetland, specify the following:

<u>Directly abuts? (Y/N)</u>	<u>Size (in acres)</u>	<u>Directly abuts? (Y/N)</u>	<u>Size (in acres)</u>
Y	0.93	N	0.18
N	0.096		

Summarize overall biological, chemical and physical functions being performed: Wetland Area 2 abuts the ephemeral stream. Wetland Areas 3 and 4 do not abut the stream and are separated from Wetland Area 2 and each other by uplands.

C. SIGNIFICANT NEXUS DETERMINATION

A significant nexus analysis will assess the flow characteristics and functions of the tributary itself and the functions performed by any wetlands adjacent to the tributary to determine if they significantly affect the chemical, physical, and biological integrity of a TNW. For each of the following situations, a significant nexus exists if the tributary, in combination with all of its adjacent wetlands, has more than a speculative or insubstantial effect on the chemical, physical and/or biological integrity of a TNW. Considerations when evaluating significant nexus include, but are not limited to the volume, duration, and frequency of the flow of water in the tributary and its proximity to a TNW, and the functions performed by the tributary and all its adjacent wetlands. It is not appropriate to determine significant nexus based solely on any specific threshold of distance (e.g. between a tributary and its adjacent wetland or between a tributary and the TNW). Similarly, the fact an adjacent wetland lies within or outside of a floodplain is not solely determinative of significant nexus.

Draw connections between the features documented and the effects on the TNW, as identified in the *Rapanos* Guidance and discussed in the Instructional Guidebook. Factors to consider include, for example:

- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to carry pollutants or flood waters to TNWs, or to reduce the amount of pollutants or flood waters reaching a TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), provide habitat and lifecycle support functions for fish and other species, such as feeding, nesting, spawning, or rearing young for species that are present in the TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to transfer nutrients and organic carbon that support downstream foodwebs?
- Does the tributary, in combination with its adjacent wetlands (if any), have other relationships to the physical, chemical, or biological integrity of the TNW?

Note: the above list of considerations is not inclusive and other functions observed or known to occur should be documented below:

1. **Significant nexus findings for non-RPW that has no adjacent wetlands and flows directly or indirectly into TNWs.** Explain findings of presence or absence of significant nexus below, based on the tributary itself, then go to Section III.D: .
2. **Significant nexus findings for non-RPW and its adjacent wetlands, where the non-RPW flows directly or indirectly into TNWs.** Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D: The onsite wetlands and ephemeral stream are located upgradient of a previously developed healthcare facility. Any previous wetlands and stream channel on the healthcare facility which would have previously connected these wetlands and stream to a downstream TNW have been filled and converted to non-wetlands. The facility has subsurface stormwater drainage system which collects any runoff from the stream during rain events and discharges the runoff to Canal Number One. Based on the lack of surface connection with a TNW the onsite wetlands and stream therefore do not appear to provide habitat or lifecycle support function.
3. **Significant nexus findings for wetlands adjacent to an RPW but that do not directly abut the RPW.** Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D: .

D. DETERMINATIONS OF JURISDICTIONAL FINDINGS. THE SUBJECT WATERS/WETLANDS ARE (CHECK ALL THAT APPLY):

1. **TNWs and Adjacent Wetlands.** Check all that apply and provide size estimates in review area:
 - ☐ TNWs: linear feet width (ft), Or, acres.
 - ☐ Wetlands adjacent to TNWs: acres.
2. **RPWs that flow directly or indirectly into TNWs.**
 - ☐ Tributaries of TNWs where tributaries typically flow year-round are jurisdictional. Provide data and rationale indicating that tributary is perennial: .

- ☐ Tributaries of TNW where tributaries have continuous flow “seasonally” (e.g., typically three months each year) are jurisdictional. Data supporting this conclusion is provided at Section III.B. Provide rationale indicating that tributary flows seasonally: .

Provide estimates for jurisdictional waters in the review area (check all that apply):

- ☐ Tributary waters: linear feet width (ft).
☐ Other non-wetland waters: acres.
Identify type(s) of waters: .

3. Non-RPWs⁸ that flow directly or indirectly into TNWs.

- ☐ Waterbody that is not a TNW or an RPW, but flows directly or indirectly into a TNW, and it has a significant nexus with a TNW is jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional waters within the review area (check all that apply):

- ☐ Tributary waters: linear feet width (ft).
☐ Other non-wetland waters: acres.
Identify type(s) of waters: .

4. Wetlands directly abutting an RPW that flow directly or indirectly into TNWs.

- ☐ Wetlands directly abut RPW and thus are jurisdictional as adjacent wetlands.
☐ Wetlands directly abutting an RPW where tributaries typically flow year-round. Provide data and rationale indicating that tributary is perennial in Section III.D.2, above. Provide rationale indicating that wetland is directly abutting an RPW: .
☐ Wetlands directly abutting an RPW where tributaries typically flow “seasonally.” Provide data indicating that tributary is seasonal in Section III.B and rationale in Section III.D.2, above. Provide rationale indicating that wetland is directly abutting an RPW: .

Provide acreage estimates for jurisdictional wetlands in the review area: acres.

5. Wetlands adjacent to but not directly abutting an RPW that flow directly or indirectly into TNWs.

- ☐ Wetlands that do not directly abut an RPW, but when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide acreage estimates for jurisdictional wetlands in the review area: acres.

6. Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs.

- ☐ Wetlands adjacent to such waters, and have when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional wetlands in the review area: acres.

7. Impoundments of jurisdictional waters.⁹

As a general rule, the impoundment of a jurisdictional tributary remains jurisdictional.

- ☐ Demonstrate that impoundment was created from “waters of the U.S.,” or
☐ Demonstrate that water meets the criteria for one of the categories presented above (1-6), or
☐ Demonstrate that water is isolated with a nexus to commerce (see E below).

E. ISOLATED [INTERSTATE OR INTRA-STATE] WATERS, INCLUDING ISOLATED WETLANDS, THE USE, DEGRADATION OR DESTRUCTION OF WHICH COULD AFFECT INTERSTATE COMMERCE, INCLUDING ANY SUCH WATERS (CHECK ALL THAT APPLY):¹⁰

- ☐ which are or could be used by interstate or foreign travelers for recreational or other purposes.

⁸See Footnote # 3.

⁹ To complete the analysis refer to the key in Section III.D.6 of the Instructional Guidebook.

¹⁰ Prior to asserting or declining CWA jurisdiction based solely on this category, Corps Districts will elevate the action to Corps and EPA HQ for review consistent with the process described in the Corps/EPA Memorandum Regarding CWA Act Jurisdiction Following Rapanos.

- ☐ from which fish or shellfish are or could be taken and sold in interstate or foreign commerce.
- ☐ which are or could be used for industrial purposes by industries in interstate commerce.
- ☐ Interstate isolated waters. Explain: .
- ☐ Other factors. Explain: .

Identify water body and summarize rationale supporting determination: .

Provide estimates for jurisdictional waters in the review area (check all that apply):

- ☐ Tributary waters: linear feet width (ft).
- ☐ Other non-wetland waters: acres.
- Identify type(s) of waters: .
- ☐ Wetlands: acres.

F. NON-JURISDICTIONAL WATERS, INCLUDING WETLANDS (CHECK ALL THAT APPLY):

- ☐ If potential wetlands were assessed within the review area, these areas did not meet the criteria in the 1987 Corps of Engineers Wetland Delineation Manual and/or appropriate Regional Supplements.
- ☐ Review area included isolated waters with no substantial nexus to interstate (or foreign) commerce.
 - ☐ Prior to the Jan 2001 Supreme Court decision in “*SWANCC*,” the review area would have been regulated based solely on the “Migratory Bird Rule” (MBR).
- ☒ Waters do not meet the “Significant Nexus” standard, where such a finding is required for jurisdiction. Explain: .
- ☐ Other: (explain, if not covered above): .

Provide acreage estimates for non-jurisdictional waters in the review area, where the sole potential basis of jurisdiction is the MBR factors (i.e., presence of migratory birds, presence of endangered species, use of water for irrigated agriculture), using best professional judgment (check all that apply):

- ☐ Non-wetland waters (i.e., rivers, streams): linear feet width (ft).
- ☐ Lakes/ponds: acres.
- ☐ Other non-wetland waters: acres. List type of aquatic resource: .
- ☐ Wetlands: acres.

Provide acreage estimates for non-jurisdictional waters in the review area that do not meet the “Significant Nexus” standard, where such a finding is required for jurisdiction (check all that apply):

- ☒ Non-wetland waters (i.e., rivers, streams): **3,140** linear feet, **3** width (ft).
- ☐ Lakes/ponds: acres.
- ☐ Other non-wetland waters: acres. List type of aquatic resource: .
- ☒ Wetlands: 10.40 acres.

SECTION IV: DATA SOURCES.

A. SUPPORTING DATA. Data reviewed for JD (check all that apply - checked items shall be included in case file and, where checked and requested, appropriately reference sources below):

- ☒ Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant: .
- ☒ Data sheets prepared/submitted by or on behalf of the applicant/consultant.
 - ☐ Office concurs with data sheets/delineation report.
 - ☐ Office does not concur with data sheets/delineation report.
- ☐ Data sheets prepared by the Corps: .
- ☐ Corps navigable waters’ study: .
- ☐ U.S. Geological Survey Hydrologic Atlas: .
 - ☐ USGS NHD data.
 - ☐ USGS 8 and 12 digit HUC maps.
- ☒ U.S. Geological Survey map(s). Cite scale & quad name: 1:24,000 Pass Christian.
- ☒ USDA Natural Resources Conservation Service Soil Survey. Citation: .
- ☒ National wetlands inventory map(s). Cite name: .
- ☐ State/Local wetland inventory map(s): .
- ☐ FEMA/FIRM maps: .
- ☐ 100-year Floodplain Elevation is: (National Geodetic Vertical Datum of 1929)
- ☐ Photographs: ☐ Aerial (Name & Date): .
 - or ☐ Other (Name & Date): .
- ☐ Previous determination(s). File no. and date of response letter: .
- ☐ Applicable/supporting case law: .
- ☐ Applicable/supporting scientific literature: .
- ☐ Other information (please specify): .

Appendix D-Authorized Agent Designation



The Chemours Company, TT 228-255-2100
Titanium Technologies chemours.com
DeLisle Plant
P.O. Box 430
7685 Kiln DeLisle Road
Pass Christian, MS 39571

September 12, 2025

Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, Alabama 36628
Jackson, MS 39289-1305

**REF: Chemours Waste Management Units 24 and 25
Delisle, Mississippi**

Dear Sir or Madam:

Please be advised that BMI Environmental Services LLC. of Gulfport, Mississippi is hereby authorized to act as our agent for permit coordination on the above referenced permit request.

Any questions regarding this project may be directed to Mr. Larry Lewis of BMI Environmental Services, LLC at 228-864-7612.

Sincerely,

A blue ink signature of Robert Mills, consisting of stylized initials and a long horizontal stroke.

Robert Mills, P.E.