

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

4244 International Parkway Suite 104 Atlanta, Georgia 30354 404-362-2537

October 21, 2022

Mr. Steven Ingle Twin Pines Minerals, LLC 2100 Southbridge Pkwy, Suite 540 Birmingham, AL 35209

SUBJECT: Twin Pines Minerals, LLC Permit Coordination Comments

Mine Name: Saunders Demonstration Mine

Mine ID: 2073 County: Charlton

Dear Mr. Ingle:

The Environmental Protection Division (EPD) has requested additional comments that were discussed with Twin Pines Minerals, LLC representatives throughout September 2022, but no response has been received.

EPD has outlined the remaining enclosed comments that need to be addressed in order to move forward in the application process. Please submit responses to jamie.lancasterl@dnr.ga.gov or by submitting hard copies to EPD Surface Mining Unit, Attn: Jamie Lancaster, 4244 International Parkway, Suite 104, Atlanta, GA 30354.

If you have any questions, please contact me at (470)251-2589.

Sincerely,

Jamie Lancaster Unit Manager

Surface Mining Unit

cc: TTL

Enclosure

Twin Pines Permit Coordination Document Charlton County: Saunders Demonstration Mine October 21, 2022

- What is TP's understanding of seepage into the pit from the surficial aquifer or other sources?
- What is TP's estimate of the rate of such seepage?
- Does TP anticipate pumping seepage water out of the pit and store it using the water management ponds as well?
- TP indicated in its process diagram that the amount of water lost in the mineral production is roughly 17%.
- Is this 17% of the flow involved in production? For example, if 1000 gpm of water is used in production, does it mean that there is 170 gpm of water consumption?
- Why is this percentage different from the Water Use Management Plan submitted in August 2022 (Page 4), i.e. 3,000 gpm processing water with a 300 gpm (10%) consumption?
- If the operation is halted because of equipment maintenance and mining pit dewatering, then there is no simultaneous loss of water from the production process. Is this understanding correct?
- EPD: Section 2B of the Water Management Plan references a question on the contingency plan for heavy rainfall events (not perking) 25 year 24 house events. How often do you anticipate the heavy rainfall events to occur? TP response: Refer to the NOAA historical rainfall data, https://hdsc.nws.noaa.gov/hdsc/pfds/pfds map, GA
 - o Please provide a more detailed response.