



3516 Greensboro Avenue
Tuscaloosa, AL 35401
205.345.0816
www.TTLUSA.com

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Transmitted Via: Email (Jamie.Lancaster1@dnr.ga.gov)

Ms. Jamie Lancaster
Surface Mining Unit
Georgia Department of Natural Resources
Environmental Protection Division
4244 International Parkway, Suite 104
Atlanta, Georgia 30354

Subject: *Revised MLUP and Response to EPD Permit Coordination Comments 10.20.21
Twin Pines Minerals, LLC
Saunders Demonstration Mine
Charlton County, Georgia
EPD Mine ID No. 2073*

Dear Ms. Lancaster:

Transmitted herewith is a revised copy of the Mining Land Use Plan (MLUP) that has been revised to provide responses to the Georgia Environmental Protection Division's (EPD's) letter dated October 20, 2021. The EPD letter provided review comments to the Surface Mining Application, Mining Land Use Plan and Exhibits submitted by Twin Pines Minerals, LLC (TPM) on September 17, 2021. These documents/responses consist of the following:

- Revised MLUP to address EPD comments,
- A summary of revisions to the MLUP sheets, and
- Response to EPD Comments.

Please contact the undersigned with any questions.

Sincerely,
TTL, Inc.

Sheryle G. Reeves, P.E.
Principal Engineer

James R. Smith, P.G.
Principal Geologist

Summary of Revisions to the MLUP Sheets

- Sheet 1 – Revised permit boundary shape and revised Table of Contents to incorporate new sheets.
- Sheet 2 – Revised permit boundary shape and acreage in legend box.
- Sheet 3 – Revised permit boundary shape and acreage in legend boxes. Revised the shape of the sand processing area and mine pit water management ponds.
- Sheet 4 – Revised permit boundary shape and acreage in legend box.
- Sheet 5 – No revisions.
- Sheet 6 – New sheet to depict pond design details and notes
- Sheet 7 – New sheet to include discussion of pond volume calculations and process flow
- Sheet 8 – Renumbered (formerly Sheet 6). Revised permit boundary shape and acreage in legend box. Revised the shape of the sand processing area and mine pit water management ponds. Added stormwater outfall 008.
- Sheet 9 – Renumbered (formerly Sheet 7)
- Sheet 10 – New sheet to detail temporary vegetation planting schedule
- Sheet 11 – Revised (formerly Sheet 8); Added Letter I to Performance Criteria for Reclamation section to detail pond closure specifications
- Sheet 12 – Renumbered (formerly Sheet 9); Revised permit boundary shape and acreage in legend box.
- Sheet 13 – Renumbered (formerly Sheet 10)
- Sheet 14 - Renumbered (formerly Sheet 11); Revised permit boundary shape and acreage in legend box.
- Sheet 15 – Renumbered (formerly Sheet 12)
- Sheet 16 – Renumbered (formerly Sheet 13); Revised permit boundary shape and acreage in legend box.
- Sheet 17 – Renumbered (formerly Sheet 14); Revised permit boundary acreage and center of the site coordinates in Section 3.1

Response to EPD Comments

Twin Pines Minerals, LLC (TPM) has reviewed the Twin Pines Permit Coordination comments provided by the EPD, dated October 20, 2021, and offers the following responses. Each comment is presented below, followed by TPM's response.

1. Sheet 3: Mining Plan Sheet and Sheet 6: Erosion & Sediment Control Plan

EPD Comment - *Please provide the design characteristics for all ponds; including the storage calculations and cross sections (liners, exterior and interior slopes, elevations, emergency overflow and pond water elevations).*

Response: See Sheets 6 and 7 of the revised MLUP.

EPD Comment - *Describe how water will enter and discharge from the ponds.*

Response: See Sheets 6 and 7 of the revised MLUP.

EPD Comment - *Specify on the sheet(s) if any storm water will be discharged from the mine or if it will remain within the permit boundary.*

Response: Stormwater drainage outfalls 1 through 8 along the permit boundary are depicted on Sheet 8

EPD Comment - *Describe how exposed surfaces will be stabilized with temporary vegetation and specify the type of vegetation and when it will be planted.*

Response: Sheet 9 – Erosion Control Notes – Temporary Vegetation section discusses how disturbed areas will be stabilized using temporary vegetation. Temporary vegetation species will be planted in accordance with Table 6-4.1 – Temporary Cover or Companion Cover Crops, in the Manual for Sediment and Erosion Control in Georgia, 2016. Sheet 10 has been added to include Table 6-4.1 and Figure 6-4.1, which depicts Major Land Resource Areas in Georgia.

2. Sheet 8: Post Mining Reclamation Plan (1)

Letter H under Performance Criteria for Reclamation states “No ponds or lakes are proposed as part of the reclamation plan”. Please provide the specifications for the closure of all ponds listed on site as well as the water in the ponds.

Response: Sheet 11 – Added Letter I to Performance Criteria for Reclamation section to detail pond closure specifications