



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT - 3 2019

Colonel Daniel H. Hibner, District Engineer
ATTN: Ms. Holly Ross
U.S. Army Corps of Engineers
Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31401-3640

Subject: SAS-2018-00554, Twin Pines Minerals, LLC heavy mineral sands mine in
Charlton County, Georgia

Dear Colonel Hibner:

This letter is in reference to Public Notice (PN) SAS-2018-00554, for the permit application submitted by Twin Pines Minerals, LLC to directly impact 587 acres of wetlands and 7,112 linear feet of streams during the mining of heavy mineral sands in southern Charlton County, Georgia. The proposed 2,414-acre mine area lies in proximity to the Okefenokee National Wildlife Refuge (NWR), and the potential secondary effects of the mine on the NWR have not been demonstrated by the permit applicant. The U.S. Environmental Protection Agency sent the Savannah District of the U.S. Army Corps of Engineers (Corps) a letter regarding this PN on September 12, 2019, identifying concerns with respect to compliance with the Clean Water Act Section 404(b)(1) Guidelines set forth at 40 CFR Part 230. The letter outlined the EPA's concerns and recommendations about the project's potential impacts on freshwater wetlands located in the project area and potential secondary impacts to the adjacent Okefenokee NWR (see enclosed letter).

To date, the EPA has received no additional information from the Corps to address these concerns. Based on the limited information made available, pursuant to Part IV, paragraph (3)(b) of the 1992 Clean Water Act Section 404(q) Memorandum of Agreement between the EPA and the Department of the Army, the EPA finds that the proposed project will have a substantial and unacceptable impact on aquatic resources of national importance.