

with the Floridan Aquifer.<sup>1</sup> The North Florida Regional Water Supply Plan,<sup>2</sup> approved by Florida's Suwannee River Water Management District and St. Johns River Water Management District, includes a North Florida-Southeast Georgia (NFSEG) regional groundwater flow model,<sup>3</sup> which clearly shows that water withdrawals in Georgia affect Florida. This is yet another reason this mining Application affects the state of Florida.

The current 219-page Application and the hundreds of pages of appendices include several reports that describe simulation modeling of surface and groundwater. To date these modules have not been peer-reviewed, nor have they been reviewed by any Florida state agency. They need to be reviewed by the state of Florida.

A cursory review of the Application reveals little, if any, mention of the Suwannee River, whose headwaters is the Okefenokee Swamp, nor of the four titanium mines in north Florida for which Twin Pines Minerals along with Chemours is under a Florida Consent Order for a range of violations, nor of the hydrological effects of the phosphate mine in Hamilton County, Florida, downstream on the Suwannee River. The present Application does not appear to include any test wells nor river monitoring for the Suwannee or St. Marys Rivers. The Application also lacks a Reclamation Plan. All of these issues, and no doubt others that will be revealed through further examination, require review and comment by the state of Florida.

These and other issues that are discovered should be discussed in public hearings in south Georgia and north Florida. The Application claims to be for a "reduced mining area" yet the acreage is approximately 86% of that from the previous Application. The Applicant claims that "reduction" is a significant change in scope of the project. Any significant change in scope is grounds for public hearings. Thus the Applicant's claim of "reduction" is yet another reason to hold public hearings. The state of Florida needs an opportunity to call for such public hearings in Florida.

Therefore we request EPA regarding permit application SAS-2018-0054 to determine that the mining activities of the subject Application may affect the quality of the waters of the state of Florida and to notify the state of Florida, the district engineer, and the applicant that Florida *"has 60 days from receipt of EPA's notice to determine if the proposed discharge will affect the quality of its waters so as to violate any water quality requirement in such state, to notify EPA and the district engineer in writing of its objection to permit issuance, and to request a public hearing."*

Thank you for your consideration.

For the rivers and the aquifer,

John S. Quarterman  
Suwannee RIVERKEEPER®  
229-242-0102  
contact@suwanneeriverkeeper.org  
[www.suwanneeriverkeeper.org](http://www.suwanneeriverkeeper.org)

---

<sup>1</sup> Kitchens, S and Rasmussen, TC. Hydraulic Evidence for Vertical Flow From Okefenokee Swamp To The Underlying Floridan Aquifer In Southeast Georgia. Proceedings of the 1995 Georgia Water Resources Conference, held April 11 and 12, 1995, at The University of Georgia, Kathryn J. Hatcher, Editor, Carl Vinson Institute of Government, The University of Georgia, Athens, Georgia. <https://smartech.gatech.edu/handle/1853/44003>

<sup>2</sup> North Florida Regional Water Supply Plan, North Florida Regional Water Supply Partnership, accessed 5 September 2019, <https://northfloridawater.com/watersupplyplan/index.html>

<sup>3</sup> North Florida-Southeast Georgia (NFSEG) regional groundwater flow model, North Florida Regional Water Supply Partnership, accessed 5 September 2019, <https://northfloridawater.com/groundwaterflowmodel.html>