

Creek, and ideally on Cypress Creek and Little Swannee Creek where they cross US 441?

Water Management, Mercury, Spills, and Slimes

The last paragraph of Dr. Zeng's November 16, 2023, Memorandum says,

“EPD conducted modeling analysis of water management at Twin Pines’ mining site utilizing its Water Management Pond System. Given the latest parameters of seepage into the mining pit, the subsequent need to dewater it, the storage within the Water Management Pond System, the demarcation of storage between the portion supporting the industrial process and the portion that handles high inflows, and the intended evaporation of wastewater at 1,000 gallons per minute (with 55 evaporators each at 40 gallons per minute capacity), we concluded that the water management as described is feasible and is without the need to discharge.”

Mercury

Even if the evaporators prevent discharge, they are concentrating sediments from the wastewater. As noted in our September 19, 2019, comment to the U.S. Army Corps of Engineers (USACE) on Application Number: **SAS-2018-00554**,³ the Okefenokee Swamp and its environs is known to have air-deposited mercury originating from coal mines.

In the GA-EPD Response to Comments, page 16,

“16.1 Public Comment – Mercury:

- *No mention of mercury and what to do if it is found during monitoring.*

“EPD Response:

“Natural low concentrations of mercury on the site have been found to be below the drinking water standard for groundwater. Additional details related to groundwater monitoring can be found on Sheet 11 of the MLUP.”

- **Why should anyone assume concentrations of mercury would remain low after concentration by evaporation of wastewater?**

Sheet 11 of the MLUP mentions Mercury in “TABLE 3.2-4. WATER QUALITY PARAMETERS AND COPCS TO BE MEASURED IN SURFACE WATER SAMPLES.” as parameter “MERCURY, TOTAL,” laboratory method “EPA 1631E”.

Section 3.3 “SAMPLE COLLECTION AND DATA ANALYSIS PROCEDURES” says,

³ WWALS to USACE and GA-DNR, September 12, 2019, “Applicant: **Twin Pines Minerals, LLC**, Application Number: **SAS-2018-00554**”, <https://wwals.net/?p=50140>