



September 20, 2017

Mr. Clark Wooten
RDA, LLC
P.O. Box 527
Newton Grove, NC 28366

RE: Request for Supplemental Information
Mine Permit Application I-002171, RDA, LLC
RDA Mine, Williamsburg County

Dear Mr. Wooten:

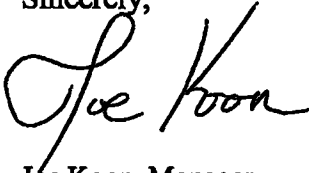
The South Carolina Department of Health and Environmental Control (DHEC) is in receipt of the Mine Permit Application I-002171 for the RDA Mine submitted by Kennedy Consulting Services (KCS) on behalf of RDA, LLC (RDA). DHEC is performing the technical review of the application and is hereby requesting supplemental information. The following is a list of information requested and the reasoning for each request:

1. Submitted with the application was the *Hydrogeologic Evaluation of the RDA, LLC Property* (Evaluation) written by Groundwater Management Associates, Inc. (GMA). Within the report two prior geological studies for the RDA Mine site (*Subhorizon Geological Resources, 2016 & Subhorizon Geological Resources, 2017*) were referenced. Please provide the core locations and lithologic logs from these referenced reports. This information will assist with the review of the hydrogeologic calculations conducted by GMA to estimate the groundwater drawdown and will be considered in the assessment of the adequacy of the location and number of groundwater monitoring wells proposed for the RDA Mine site.
2. DHEC staff visited the RDA Mine site on July 26, 2017. During the visit, discussion took place regarding the groundwater drawdown rates and volumes presented in the GMA Evaluation. It was established that the groundwater drawdown was calculated for a single 278-acre active pit, which seems to conflict with RDA's proposed process of mining in segments. Mr. Craig Kennedy of KCS stated that calculations for the groundwater drawdown for the 45-acre segment 5 of the mine were also used to estimate drawdown and discharge rates. Please submit these additional calculations for review as they may be a more applicable and realistic estimate of groundwater drawdown for the proposed segmented mining process.
3. RDA proposes to initiate mining in the 45-acre segment 5 portion of the mine, DHEC is requesting RDA to provide justification for the proposal. DHEC will review this justification and the information requested in the following number 4 to evaluate where mining may initiate and how to monitor water levels accordingly.

4. DHEC requests that RDA elaborate on the process and methodology for mining and concurrent reclamation. DHEC makes this request to better understand what mining processes and methods RDA may use to limit and manage groundwater drawdown.

This supplemental information should be submitted to the Department within 30 days of receipt of this letter. If you have any questions or concerns, please contact me at 803-898-1371 or koonjm@dhec.sc.gov.

Sincerely,



Joe Koon, Manager
Mining and Reclamation Section

Copy by email: Craig Kennedy, craigkennedy.kcs@gmail.com
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