

ROY COOPER  
*Governor*

MICHAEL S. REGAN  
*Secretary*

BRIAN WRENN  
*Director*



NORTH CAROLINA  
*Environmental Quality*

September 16, 2020

Certified Mail

Return Receipt Requested

7019 1120 0000 5072 4014

Mr. Scott Martino  
Carolina Sunrock LLC  
200 Horizon Drive, Suite 100  
Raleigh, North Carolina 27615

RE: Proposed Prospect Hill Quarry and Distribution Center  
Caswell County  
Roanoke River Basin

Dear Mr. Martino:

We have reviewed the application your company submitted for the referenced mine site. In order for this office to complete its review of the referenced project in accordance with GS 74-50 and 51 of the Mining Act of 1971, please provide the additional or revised information in accordance with the following comments:

1. Please clarify haul roads on site. The proposed haul roads shown on the plans (Sheet 5) do not appear to show access to all areas of the site. The proposed road extends east of Creek Crossing 2, appearing to meet Pit B and stop, but showing no apparent access to features to the north or south. Please clarify how the overburden areas and Basin #39 will be accessed throughout the life of mine. Please clarify how truck traffic will access the proposed asphalt and concrete plants from the aggregate plant.
2. Future Ultimate Pit Boundary (Black line, Sheet 5) shows wetlands and basins within the pit limits. Please clarify whether it is your intention to mine these areas, if so, please provide proof of all appropriate permitting, approvals from DWR for these impacts, and include a plan of the phased pit development.
3. Please clarify the abandonment of well 4 in Pit B Phase I.
4. Please explain access and sediment and erosion control measures in the area of Pit B Phase X, while activity is occurring in Pit B Phase IX. The phased pit construction does not show any measures being taken for traffic passing from Phase IX through Phase X.
5. Please clarify the location of ODA-2 and ODA-3. ODA-2 appears twice on the Mine Map sheets.
6. Please specify the sequence of sediment basin construction for Basin 20, 23, 21, 6.
7. Please address when crossings will be installed. Please expand on sequencing and phasing to clarify how work will proceed across the site in order to allow for adequate review of the proposed measures. The



North Carolina Department of Environmental Quality | Division of Energy, Mineral and Land Resources  
512 North Salisbury Street | 1612 Mail Service Center | Raleigh, North Carolina 27699-1612  
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Mr. Martino

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phasing on Mine Plan Sheet 5e does not clarify what work will be done prior to work in the pits. The phasing only states "All Pit Phases to be opened and operated as needed,".

8. The additional information submitted by Carolina Sunrock, LLC on August 19, 2020 was drafted prior to the Division of Air Quality's denial of permit applications for the concrete and asphalt plants. Please provide information on how the potential adverse effects to air quality referenced in the Division of Air Quality's denial will be mitigated.
9. Please see the enclosed email from the Winston Salem Regional Office regarding sediment and erosion control. The issues noted from the Winston Salem Regional Office staff must be completely addressed.

Please note, this office may request additional information, not included in this letter, as the mining application review progresses. Be advised that our review cannot be completed until all of the items listed above have been fully addressed.

In order to complete the processing of your application, please forward two (2) copies of the requested information to my attention at the following address:

Division of Energy, Mineral and Land Resources  
Department of Environmental Quality  
1612 Mail Service Center  
Raleigh, NC 27699-1612

As required by 15A NCAC 5B.0113, you are hereby advised that you have 180 days from the date of your receipt of this letter to submit all of the requested information. If you are unable to meet this deadline and wish to request additional time, you must submit information, in writing, to the Director clearly indicating why the deadline cannot be met and request that an extension of time be granted. If an extension of time is not granted, a decision will be made to grant or deny the mining permit based upon the information currently in the Department's files at the end of the 180-day period.

Though the preceding statement cites the maximum time limit for your response, we encourage you to provide the additional information requested by this letter as soon as possible. Your prompt response will help us to complete processing your application sooner.

Please contact me at (919) 707-9220 if you have any questions.

Sincerely,



Adam R. Parr  
Assistant State Mining Engineer

Enclosures

cc: Ms. Tamera Eplin, PE

## Winston Salem Regional Office Comments

1. How will you maintain 679 stone fence outlets after any significant rainfall within a reasonable time period (i.e. one week or next rainfall)? Have you considered adjusting the sediment basin locations and/or LOD to reduce the drainage areas downstream of basins and diversions? These outlets are considered stormwater outfalls and will need to be monitored per the NCG02 Stormwater Permit for mining. The amount of disturbed area draining through basins and traps should be maximized.

Be advised stone outlets are not a sediment treatment device. Any reference to maximum drainage area is not approvable nor applicable. They are not intended to function as a measure in lieu of a sediment trap or basin and offer no filtration value for retention of sediment. Their primary purpose is to prevent silt fence laydown for small retention areas that cannot otherwise be directed toward a basin or trap. Redesign appears justified.

Silt fencing typically has a design life of six months. Will the silt fence and stone outlets be replaced every six months for the life of this mine? Redesign is recommended.

2. Regarding general basin design, in addition to flow through three baffles, the percentage of surface area in each cell should be roughly 25% of the total surface area of the basin. Please refer to Sections 6.65 of the North Carolina Erosion and Sediment Control Planning and Design Manual. Reconfiguration of the sediment basin and baffle placement may be necessary to achieve approvable design.
3. The proposed rip rap transition areas are not measures included in the North Carolina Erosion and Sediment Control Planning and Design Manual. Please provide details and specifications for installation and maintenance of these measures.
4. Plan review includes evaluation of proposed measures to assure that they will be sufficient to retain the sediment generated by the land-disturbing activity within the boundaries of the tract during construction. This includes verifying that particular measures are appropriate for their corresponding drainage areas, especially for perimeter measures which drain large areas, such as basins. We require skimmer brands to be specified because approvable design of the basin withdrawal rate is crucial for assuring compliance.

The supporting calculations provided to justify the skimmer selection and sizing are based on the particular proposed skimmer. Verification that the skimmer has been sized appropriately is a step in evaluating basin design. Additionally, each skimmer manufacturer has design criteria specific to their brand. Therefore, in order to use an alternative skimmer, it will be the owner's responsibility to submit an approvable modification to the plan with supporting calculations verifying that substituting the proposed device will not result in off-site sedimentation.

Please clarify where the skimmer brand is specified on the plans. Please also specify the skimmer arm length on the plans.