

ASBESTOS MONITORING & MITIGATION PLAN

1. INTRODUCTION

This Asbestos Monitoring and Mitigation Plan ("Plan") has been prepared by Heidelberg Materials Northeast LLC ("Heidelberg") to establish asbestos monitoring and mitigation protocols for Heidelberg's non-metallic mineral quarry located near 2055 North Rockhill Road, Sellersville, PA 18960 in Bucks County. The Rock Hill Quarry ("Quarry") is an existing mining operation authorized to conduct mining activities under Surface Mine Permit No. 7974SM1 issued on October 13, 1976 ("Permit").

Note: This Plan is intended only to identify the monitoring and mitigation protocol for quarry activities authorized under the Permit. Heidelberg acknowledges that the Pennsylvania Department of Environmental Protection (PADEP) may require amendments to this Plan at any time, including any additional or revised air quality permitting requirements; and that any amendments are only effective following approval by PADEP.

This Plan does not separately authorize any operations beyond that authorized by the Permit, nor does it limit any condition(s) or requirement(s) in the Permit. Further, this Plan does not limit any applicable statutory, regulatory, or permitting requirements for the Quarry, including but not limited to PADEP's applicable air quality permitting and regulatory requirements.

2. DESCRIPTION OF FACILITY

The Quarry is located in East Rockhill Township, Bucks County, PA. The site includes 109.8 acres authorized under the Permit. The Quarry consists of a quarry pit, stockpile storage areas, and related erosion and sediment/stormwater control features (e.g., sediment ponds and traps, collection ditches, and other best management practice features). Heidelberg will extract diabase rock at the Quarry to produce sized aggregate products for customers. Heidelberg, or a subcontractor, will obtain the necessary permits prior to operation of any aggregate processing equipment.

3. PERIMETER AIR MONITORING

Heidelberg will conduct perimeter air monitoring during mining operations to identify, evaluate, and address potential asbestos emissions at or near the Quarry property lines in accordance with the protocols set forth in this Section 3.

3.1 PERIMETER AIR SAMPLING LOCATIONS & WIND MONITORING

There are eight (8) locations along the perimeter of the property at which air samplers will be located, as indicated on Figure 2. These points are evenly spaced around the site perimeter to encompass both upwind and downwind locations to ensure sampling is not affected by possible shifting winds. The locations of the samplers have been selected based on a number of factors including existing equipment operating locations, site topography and prevailing winds at the Quarry.

Sampler placement will remain fixed, subject to any relocation as may be required by PADEP depending upon the results of monitoring required by this Plan, activity-based sampling, separate Bureau of Air Quality permit(s) (as may be applicable), or other activities in connection with Quarry operations.

Based on the data collected from the weather station installed at the Quarry on May 9, 2022, the following Wind Rose plot indicates winds generally blow from the west / northwest (Figure 1).

Figure 1 – Wind rose diagram displaying wind direction and speed data – Rock Hill Quarry Weather Station

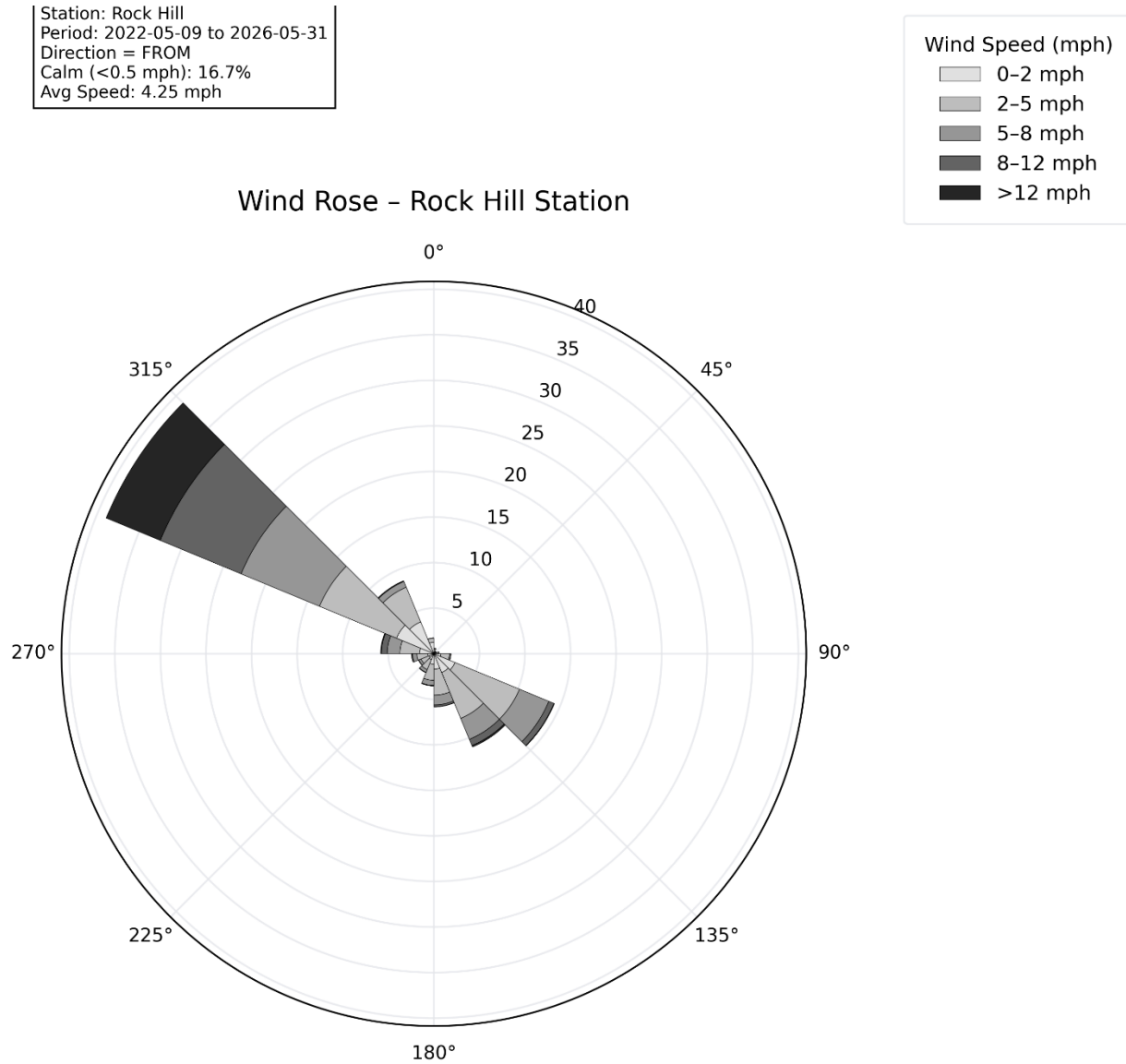
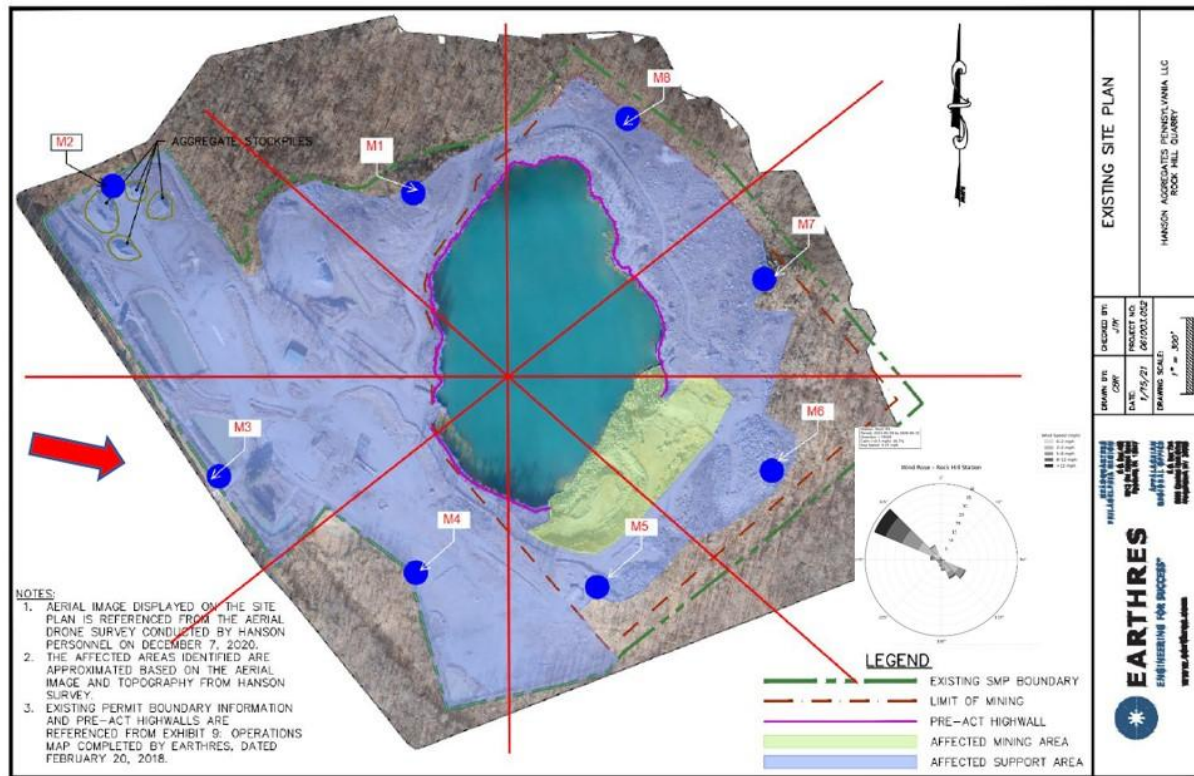


Figure 2 – Locations of 8 samplers along the perimeter of the Heidelberg Materials property at Rockhill, PA. [The red arrow indicates the approximate prevailing wind direction]



Unless otherwise approved by PADEP, wind direction, wind speed, and precipitation will be monitored and recorded continuously at the Site each operating day using the automated weather station permanently installed at the Quarry. The recorded monitoring data is available via web interface for three (3) years and digital records will be maintained by Heidelberg for a minimum of five (5) years.

If the automated weather station stops monitoring or recording the wind speed or wind direction as a result of a malfunction, within one (1) business day of discovery of the malfunction, Heidelberg will notify PADEP and take steps to have the automated weather station repaired or replaced. If the weather station becomes inoperable, Heidelberg will replace it within one (1) month unless otherwise approved in writing by the PADEP. If the automated weather station malfunctions or becomes inoperable, Heidelberg will collect wind speed and wind direction data from the nearby NOAA station at the Quakertown Airport to meet the requirements of this section until the malfunction is corrected or the on-site weather station is replaced.

Quakertown Airport Data:

(https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=UKT&network=PA_ASOS)

The number and locations of the perimeter monitors are sufficient to account for potential shifts in wind directions. If significant wind direction changes during a sampling event, the time and change in direction will be documented. If it is determined that the wind direction has changed, creating a situation where the designated downwind samples are no longer downwind of the

active operational areas, this fact will be noted on the sample data forms and the appropriate “new” downwind samples will be identified.

In the unlikely event that sampling locations need to be adjusted between perimeter sampling events to provide more representative data and consideration of spatial conditions, all adjustments will be documented to show the reason for the change.

3.2 FIELD SAMPLE COLLECTION METHODOLOGY

The perimeter air samples will be collected using low flow air sampling pumps at the selected locations indicated in Figure 2 above. The perimeter air sampling pumps used for the sample collection will be the Escort Elf air pumps by Zefon International (or equivalent).

Consistent with the analytical methods discussed in Section 3.4, each perimeter pump will be affixed with a cassette (and cowl) that contains either a 25-millimeter (mm) diameter Mixed Cellulose Ester (MCE) filter with a maximum pore size of 0.45 micrometers (μm) or a 25 mm diameter capillary pore polycarbonate filter of maximum pore size 0.4 μm . The cassette and cowl shall be fully conductive to reduce particle loss to the sides of the cassette due to electrostatic attraction. All perimeter air monitoring samples from the eight (8) air monitoring sample locations will be collected at a height of four (4) to six (6) feet above the ground surface with a sampling cassette and filter affixed to a sampling post station or tripod. At least two (2) field blanks (or 10% of the total samples, whichever is greater) will be collected for each sampling event.

Each perimeter air sampling pump will be operated at approximately one (1) to four (4) liters per minute (lpm). Sampling times will vary; however, all sample durations will be established to assure an adequate sample volume to achieve an analytical sensitivity of 0.001 structures per cubic centimeter (s/cc). Pump calibration is to be performed at the beginning and rechecked at the end of a sampling event with a rotameter (DRI-CAL or Digical primary calibrator or equivalent) using the same type of cassette on which the sample is collected.

The sample collector will record the pump serial number, sample number, initial flow rate, sample start/end times, sample locations, and final flow rate on the Field Data Sheets (see Attachment 1 – Field Sampling Documents). Sampling Field Data Sheets will be used to record sample collection information, field measurement and field observations obtained during each sampling event. Information in the datasheets will include, at a minimum, the following:

- Location of the sample, site activities being conducted during sample collection
- Date and time of collection
- Sampling flow rate and volume
- Description of temperature, wind direction, wind speed and general weather conditions
- The unique sample identification number for each air sample

Field notes will also be recorded during all sampling events. The notes will include general information, mining activity description, weather conditions, wind direction, etc. (see Attachment 1 – Field Sampling Documents for examples of both the Field Data Sheets and the Field Notes). Field notes will include a site map with the sample locations for each sampling event clearly marked on the map, and references to photographs as needed to document site

sampling activities. Any non-routine site activities will also be noted in the field notes (e.g., lawn mowing, grading, etc.).

Data sheets and field notes will include pump serial number, sample number, sample location, initial flow rate, final flow rate, sample start time, sample end time, weather conditions and site activities. They will also be signed and dated by the field technician.

Photographs of Air Sampling Activities

Photographs will be taken of each air sampling location. The photographs will provide backup documentation of sampling activities. A log of the photographs will be recorded and will include the sampling activity and approximate location and direction for each photograph.

Chain of Custody Records

Chain of custody procedures will be used to maintain and document sample collection and possession. During the sampling process, a laboratory Asbestos Chain-of-Custody form provided by the Laboratory will be completed (see Attachment 1 – Field Sampling Documents). The completed Chain-of-Custody will accompany all samples in a sealed pouch and be signed as required as each sample package recipient receives and relinquishes possession of the sample package.

Sample Packaging and Shipment

The air sample filter cassettes will be packaged in accordance with established laboratory-recommended handling practices. Each cassette will be securely capped, placed in an individual plastic bag, and cushioned within a rigid shipping container using non-static materials such as bubble wrap or paper, avoiding electrostatically charged materials like Styrofoam peanuts to prevent potential fiber loss. All samples will be kept dry and protected from moisture during transit, and appropriate temperature control will be used when required by laboratory instructions. Shipment tracking information will be provided for each delivery to ensure traceability and timely receipt by the analytical laboratory.

Weather and Wind Direction Data

During mining operations and all field monitoring events, wind speed, wind direction, and precipitation will be monitored from the onsite permanent weather station. The data will be collected as referenced in Section 3.1 and will be reviewed prior to and following each sampling event.

3.3 AIR SAMPLING

3.3.1 GENERAL SAMPLING PROTOCOL

Sampling under this Plan will be in accordance with the following general protocol:

- Daily activities and hours of operation will vary at the Quarry. Heidelberg will coordinate and conduct sampling events to be representative of authorized mining operations in any given month, if mining activity occurs. Sampling will

coincide with facility operations and will not be conducted on days when the Quarry is closed.

- For each sampling event, Heidelberg will collect data from all eight (8) samplers identified in Figure 2. For each sampling location, Heidelberg will collect emissions data for the entire operations day from a low volume monitor. Per section 3.2, the quantity of air collected in each sample will achieve an analytical sensitivity of 0.001 structures/cc. A sampling event that does not collect emissions data for the entire work day will be promptly repeated.
- Heidelberg shall keep a log of quarry activities that occur during each sampling event.
- Heidelberg or its designated contractor will notify PADEP at least two (2) working days prior to initiating each air sampling event conducted pursuant to this Plan so that PADEP representatives have an opportunity to collect samples at the same locations during the same time period. Heidelberg or its designated contractor will facilitate PADEP's sample collection efforts by providing access to sampling locations and sufficient time and space to sample.
- The PADEP will be notified of any unusual changes in the sampling via electronic mail. In addition, PADEP will be notified as soon as possible if any sampling event has been cancelled along with the reason for the cancellation.
- This protocol will remain effective subject to any amendments, as may be required and approved by PADEP.

3.3.2 AIR SAMPLING FREQUENCY

Daily hours of operation may vary. Air sampling events will coincide with days the facility is operating and will not be conducted on closed days.

Samples will be collected pursuant to the following frequency:

- For all sample points, samples will be collected two (2) times per month during operations. If the Quarry only operates during one (1) work-week (Monday to Friday) or less during any given month, samples will be collected only once that month during that week of operation.
- Based on the initial six (6) samples collected, for all sample points with a countable amphibole structure concentration of less than or equal to 0.01 s/cc, air sampling frequency will then be reduced to a quarterly basis. Samples need not be collected in consecutive months if no quarry operations occur during a given month.
- For any new points not already identified in this Plan, monitoring will be conducted two (2) times per month (or once per month if the Quarry only operates during one work-week) until six (6) samples have been collected, and

then reduced to quarterly if there are no countable amphibole structures detected at concentrations greater than 0.01 s/cc.

- Existing and new sampling points being monitored on a quarterly basis may be reduced to an annual (once per 12 months) basis if the quarterly results collected during operations are at or below the 0.01 s/cc for four (4) consecutive quarters.
- Any air sample location with a countable amphibole structure concentration greater than 0.01 s/cc (confirmed by TEM analysis), or any analytical result greater than 0.01 s/cc in the previous three (3) months, will be monitored on a weekly basis pursuant to 3.6.2.
- This frequency will remain effective subject to any amendments, as may be required and approved by PADEP.

3.4 ANALYTICAL METHODS

The analytical methods and laboratory analysis for perimeter monitoring of asbestos as required by this plan shall be those described in ISO 10312-2019-10 "Ambient Air – Determination of Asbestos Fibers – Direct Transfer Transmission Electron Microscopy Method," as modified by Page C-3 of EPA's "OSWER Directive #9200.0-68, September 2008, Framework For Investigating Asbestos-Contaminated Superfund Sites", which states that *"Under the ISO method, two specific counting schemes are detailed. The first scheme is more general and allows for the counting of fibers that are 0.5 μm in length or greater, and have aspect ratios of 5:1 or greater. In routine practice, TEM is able to resolve fibers down to approximately 0.1 μm in width, as compared to the resolution for routine PCM (0.25 μm). Therefore, short thin fibers that would not be detected using PCM will be detected using TEM under the general counting scheme. EPA recommends modification of the aspect ratio to 3:1 for this counting scheme."*

The perimeter air monitoring corrective action level to be used with this Plan is 0.01 countable amphibole structures s/cc. All amphiboles meeting the criteria listed in the above paragraph should be counted as amphibole structures.

If TEM analysis confirms countable amphibole structure concentrations in excess of 0.01 s/cc in any sample, then the reporting and corrective action requirements set forth in Section 3.6 are triggered. If any air sampling filters are determined to be overloaded with particulate and cannot be read by ISO 10312, Heidelberg shall report this to PADEP within seven (7) days of the determination. Heidelberg shall determine the reason for overloading and propose corrective action to prevent future overloading or re-analysis of the filters with another method or obtain replacement samples capable of being read via ISO 10312, within seven (7) days of the report to PADEP.

Analytical Laboratory

All samples will be analyzed by a laboratory selected from the list of asbestos analytical laboratories that are part of the National Voluntary Laboratory Approval Program (NVLAP) and are accredited by the American Industrial Hygiene Association (AIHA). Any accredited laboratory that meets the requirements listed above may be used for sample analysis.

Quality Control

A quality control (QC) program will be implemented to assure data quality. Any QC program will address instrument calibration, the collection of field blanks and duplicate samples, and data quality acceptance and rejection criteria. Should any sample fail to meet QC program requirements at a particular location, that sample at that location will be promptly resampled during subsequent two (2) weeks of operations. Further, any QC program will be subject to the following:

Field Blanks

At least two (2) field blanks (or 10% of the total number of samples collected, whichever is greater) will be submitted with each set of samples. A field blank is a new sampling cassette that is opened on site during the sampling period, kept uncovered for at least 30 seconds, and then is closed and sealed for transport to the laboratory. The purpose of the field blank is to document the possible contamination of the filter media that could occur as a result of handling the samples in the field.

Duplicate Samples

Duplicate samples may be collected if directed by PADEP to evaluate the reproducibility of sampling and analysis. Duplicate samples will be collected, stored and transported in the same manner as the primary samples. A separate number will be assigned to each duplicate, and all duplicates will be submitted blind to the laboratory. For this monitoring program, duplicate sampling will be conducted through the collection of co-located samples collected during the same sampling interval.

Field Equipment

The following equipment will be utilized for this sampling:

- Air sampling pumps (low volume pumps)
- Air sample filter cassettes with filters (25 mm, 0.45 µm pore, MCE or 25 mm, 0.4 µm, capillary pore polycarbonate)
- Air pump calibration equipment
- Quart and gallon size resealable bags
- Sample transport containers and packing material
- Additional supplies as needed including health and safety equipment
- Heidelberg Permanent Weather Station

3.5 RECORDKEEPING AND REPORTING

All records and documents related to the airborne asbestos monitoring program will be maintained by Heidelberg for at least five (5) years and will be made available to PADEP upon request. Field Data Sheets and Field Notes will be completed, signed, and dated by the recorder. All logs made in the field will be written with waterproof ink. Corrections to data entered will be made by crossing out the error with a single horizontal line, initialing and dating the correction, and entering the correct information. Crossed-out information shall be readable. Photographs will be taken during selected air sampling activities. The photographs will be used to provide

documentation of sample locations, site activities, etc., that are pertinent to the air monitoring task. A log of the photographs will be recorded and will include the sampling activity and approximate location for each photograph.

All laboratory reports and associated data sheets, as well as progress reports and other documentation related to perimeter air sampling, will be properly maintained for five (5) years. Analytical reports provided to Heidelberg by the analytical laboratory will be sent to PADEP via email within 24 hours of receipt, whenever possible, but no later than 48 hours of receipt. A summary report will be submitted to PADEP quarterly, within 90 days after the end of each quarter. All samples analyzed will be retained by the laboratory for at least one (1) year from the date of analysis to allow for follow-up testing should the need arise.

Perimeter air monitoring reports submitted to PADEP will include a summary of the analytical results for all samples collected and analyzed during the reporting period; copies of applicable chain of custody sheets and applicable field sampling logs; and a written report detailing any investigative actions or corrective measures that may have been taken during the reporting period in response to a result exceeding 0.01 s/cc.

3.6 CORRECTIVE ACTIONS

If TEM analysis performed by an independent laboratory confirms countable amphibole structure concentrations greater than 0.01 s/cc in any sample, Heidelberg will undertake the following corrective measures:

- 3.6.1 Report the results immediately to the Heidelberg site manager and Operations Manager. Heidelberg will also notify the PADEP via email within 24 hours of receipt of the TEM analysis results.
- 3.6.2 Tiered Sampling Approach:
 - 3.6.2.a Weekly sampling will be conducted at each point with a countable amphibole structure concentration greater than 0.01 s/cc until the sample results are at or below the threshold for four (4) consecutive weeks.
 - 3.6.2.b After four (4) consecutive weekly samples at or below 0.01 s/cc, sampling will be reduced to monthly.
 - 3.6.2.c After three (3) consecutive monthly samples are collected showing results at or below 0.01 s/cc, sampling will be reduced to quarterly.
 - 3.6.2.d If any air sample has a countable amphibole structure concentration greater than 0.01 s/cc (confirmed by TEM analysis) during the sampling in 3.6.2.b or 3.6.2.c above, air sampling will return to weekly as provided in Section 3.6.2.a.
- 3.6.3 Investigate the potential cause of the results. The investigation will include at least the following elements:
 - 3.6.3.a Review of operational activities that were occurring during sampling
 - 3.6.3.b Confirmation that dust suppression systems are fully operational, and
 - 3.6.3.c Quality Assurance and Quality Control review of all sampling and laboratory equipment and procedures

- 3.6.4 Heidelberg will take immediate corrective measures. These corrective measures may vary based on the location of the sample, and findings of the investigation. The investigation will begin as soon as the result is confirmed and will be completed in an expedited manner. The corrective actions may include investigation of the source of any fugitive dust, extra dust suppression measures, cleanup, repairs or modifications to systems and controls, or temporary cessation of operations.
- 3.6.5 In any month where air sampling occurs as set forth in Section 3, a report of air sampling results shall be submitted to PADEP. The report shall be submitted within seven (7) calendar days of receipt of the TEM analysis results for all samples collected during the month and shall include a plan and schedule of steps that have been, or will be, taken to identify and mitigate the source of the fugitive dust. This written report should also include the results of the most recent EPA Method 100.1 water sampling described in Section 4.
- 3.6.6 Heidelberg will record the results and all corrective measures taken at the site in a permanent written log.

4. DUST SUPPRESSION WATER SOURCE MONITORING

On an annual basis, unless otherwise approved in writing by PADEP, Heidelberg will collect a sample from the dust suppression water source (water in Quarry pit) for asbestos analysis. This sample will be collected and analyzed in accordance with EPA Method 100.1, Analytical Method for Determination of Asbestos Fibers in Water. Heidelberg will maintain records of annual EPA Method 100.1 water analyses for at least five (5) years and will make these records available to PADEP upon request. Furthermore, if perimeter air sampling triggers corrective action requirements in accordance with Section 3.6, then Heidelberg will submit the results of the most recent EPA method 100.1 analyses to PADEP in accordance with Section 3.6.

The annual sample will be collected for characterization purposes under this Plan only and will not be monitored or reported pursuant to the requirements of the Quarry NPDES permit. In the event that the annual dust suppression monitoring sample indicates an exceedance of 7.0 million fibers/Liter, Heidelberg will review relevant emissions data and take corrective action measures per section 3.6.

5. ASBESTOS AVOIDANCE MEASURES

5.1 MINERAL IDENTIFICATION AND MANAGEMENT GUIDE

Heidelberg has established and implemented a Mineral Identification and Management Guide (MIMG). This guide defines the company's procedures to properly identify and manage any materials that meet the guide's definition of "Protocol Minerals." The Guide covers a number of topics, including the following:

- Mineral identification
- Geologic field inspections by a trained geologist
- Shot rock pile inspections for suspect minerals
- Training requirements for key site personnel
- Proper management and disposal of suspect materials if identified
- Recordkeeping requirements

In addition to implementation of the protocols set forth in the MIMG, Heidelberg will also conduct sampling and analysis of settled dust samples in accordance with the following procedures:

- Heidelberg will collect a minimum of one (1) settled dust composite sample per month from a sheltered location within the portable or fixed aggregate processing plant area
- If necessary, samples will be prepared using disc pulverization (as in California Air Resources Board (CARB) Method 435, Determination of Asbestos Content of Serpentine Aggregate) in a manner that does not excessively pulverize the sample
- Samples will be analyzed by Polarized Light Microscopy (PLM) using CARB Method 435. All visible elongate mineral particles (EMPs) (those identified as asbestos fibers and cleavage fragments) with aspect ratios greater than 3:1 will be counted
- If PLM analysis does not detect asbestos fibers in the sample, the sample will be analyzed by TEM to verify results using EPA Method 600/R-93/116, Method for the Determination of Asbestos in Bulk Building Materials. All visible EMPs (those identified as asbestos fibers and cleavage fragments) with lengths greater than 0.5 µm and aspect ratios greater than 3:1 will be counted

Heidelberg will report the results of these analyses to PADEP on a quarterly basis.

5.2 EMISSIONS MITIGATION PLAN

In addition to any terms or conditions of the Permit, as well as in other permits for the Quarry, Heidelberg will implement a number of practices that are consistent with industry standards and regulatory requirements to control emissions at the Quarry. Heidelberg shall also take reasonable actions necessary, outlined below, to prevent fugitive emissions from becoming airborne and emitting beyond the Quarry.

Potential sources of dust emissions at the Quarry are listed below, as well as the practices utilized to control them. Heidelberg will utilize the following practices to control dust emissions, and as necessary to maintain compliance with 25 Pa. Code 77.455, 77.575, 123.1(c) and 123.2:

- **Training and Inspections for Visual Emissions**
 - Key plant personnel will be trained to conduct visual observations for fugitive emissions as well as opacity readings on emissions sources to ensure the emission controls are operating properly.
 - Heidelberg will regularly conduct preventative maintenance of operational and dust collection equipment to ensure the timely replacement of worn components.
- **Vehicle Traffic**
 - Heidelberg will utilize a street sweeper equipped with water sprays to clean paved plant roads and public roadways near site entrances as needed. Heidelberg will maintain a log of the time and day when the street sweeper is used.
 - The site entrance is paved to reduce tracking and improve sweeping efficiency.
 - When operating, Heidelberg will conduct visual inspections at the beginning, during and end of each day for material tracked onto public roads. If site material has accumulated on a public road, Heidelberg will clean the road promptly.

- Heidelberg will install a truck wash utilizing spray nozzles to remove loose material from loaded trucks leaving the site through the main gate. Prior to construction of a truck wash station at the Quarry, Heidelberg will install a tire scrubbing gravel pad or utilize a water truck to spray off wheels of trucks leaving the site.
- All trucks carrying products from the site are required to tarp their loads prior to exiting the site. A sign will be posted at the entrance/exit gate to the facility reminding drivers of the tarping requirements.
- Heidelberg will operate and maintain a minimum of one (1) truck equipped with water sprays to control dust from roadways. A water truck will be equipped with a water cannon to spray hard-to-reach areas of stockpiles.
- A facility-wide speed limit of 15 miles per hour (mph) will be posted and enforced.
- **Haul Roads**
 - Application of water or commercial dust suppressing palliatives during dry or windy conditions and in winter months, as needed.
 - Roads are to be resurfaced/regraded as needed to maintain a clear and safe working surface and thereby reduce dust generation.
- **Stockpiles and material handling**
 - Limit the size and disturbance of stockpiles to the minimums necessary.
 - Storage piles will be wetted using water sprays as necessary to control potential emissions. Stock and working piles will be adequately wetted or controlled using dust palliatives or suppressants, wind berms, or breaks during the addition and removal of material.
 - If necessary, Heidelberg will apply surface binders to stockpiles of fines to control dust from areas that will be temporarily inactive and may be subject to wind erosion.
 - If necessary, Heidelberg will wet materials to be handled prior to loading trucks. The drop height will be minimized as safety permits. Trucks will be loaded on the leeward side of the storage piles.
 - Heidelberg will ensure that material being excavated, crushed, screened, loaded, transferred or conveyed does not result in visible dust emissions exceeding 40 CFR Part 60, Subpart OOO limits for applicable sources.
 - Overburden will be wetted (if necessary) prior to movement or handling to minimize dust generation.
 - Wooded buffers and/or vegetated earthen berms surround the quarry. These buffers and berms within Heidelberg's control will remain in place for the life of the mining operation.
 - All efforts are to be made to limit stripping of overburden to the spring and winter months, and/or timed to be during or soon after precipitation events, when soil conditions are not conducive for the generation of large amounts of dust.
- **Drilling**
 - All drilling activity will be conducted in accordance with the PADEP authorized Blast Plan.
 - On-board dust collection and/or water sprays on drill rigs will be used to limit dust generation.
 - A drill shroud will be utilized at the ground level to control dust from drilling activities.

- **Blasting**
 - Prior to blasting, all drill cuttings will be removed from around the drill holes. The use of dust or screenings as stemming for blast holes will not be permitted. Coarse aggregate will be used for stemming.
 - To minimize the migration of dust off-site, the blast area will be pre-wetted to minimize the release of surface dust and fines, scheduling blasts only under favorable meteorological conditions.
 - In addition, smaller blasts will be utilized when possible.
- **Crushing and Sizing Equipment**
 - Prior to operating any crushing or other processing equipment, Heidelberg will submit the appropriate application(s) to the Department of Environmental Protection – Southeast Regional Office Air Quality program and will modify this AMMP to incorporate the conditions and requirements of any PADEP approval(s), as may be applicable. Subject to any applicable air quality permit authorized by PADEP, Heidelberg plans to implement the following measures:
 - Air Pollution Control devices will be installed and operated according to PADEP Best Available Technology requirements, coupled with work practices, inspection, and source observation.
 - Shot rock and processed aggregate spillage will be addressed as needed to minimize creation of dust and to maintain general housekeeping at the site.
 - The frequency of cleaning up spillage will vary depending upon how much material is running through the processing plant and how much product is being produced, loaded, and sold on a given day.
 - Conveyors will have belt scrapers where necessary to keep belts clean and reduce the amount of spillage from the conveyors. As a general practice, conveyors will not be run empty for long time periods. If there are prolonged periods when no material is being conveyed, the belts will be turned off.
 - Dust will be controlled with water sprays and/or dust collection systems in accordance with best available technology requirements on all conveyors/transfer points.