
From: Rebarchak, James
Sent: Friday, January 4, 2019 4:22 PM
To: 'mlogancps@aol.com'
Cc: Mountain, Shawn; Shankar, Sachin; Patterson, Patrick; 'Curt Mitchell'; 'Skip Garner'; choldefer@cps-2comply.com; Kutney, Michael; Latsha, Gary; Stefanko, John; Menghini, Michael; Cain, Virginia; Gallagher, Jillian; Ramos-Buschmann, Jennifer; Bollinger, Amiee
Subject: DEP AQ comments on Draft Ambient Asbestos Air Monitoring Plan and Asbestos Dust Mitigation Plan

Mike,

Thank you for the December 21, 2018 submission of the draft Asbestos Air Monitoring Plan and Fugitive and Asbestos Dust Mitigation Plan for the East Rockhill Quarry. Since the documents submitted were marked DRAFT, we were not reviewing them for approval, but are providing questions, comments and suggestions below, with the assumption that you will soon submit a final version for review. We would appreciate it if you can have a final plan submitted to DEP by January 25, 2019.

Please note that the following comments relate specifically to the draft Asbestos Air Monitoring Plan and Fugitive and Asbestos Dust Mitigation Plan required in Plan Approval 09-0241 and not to any sampling or work practice requirements the DEP Pottsville District Mining Office (PDMO) imposed under their authority or through their permitting actions.

If you have any questions regarding any of the comments, questions or suggestions listed below, please let us know so we can discuss prior to the submission of the final plan.

Asbestos Air Monitoring Plan

Section 1.2 Site Mining Permit and Asbestos Monitoring Plan

- The activities outlined in this section are not covered under the AQ permitting for this site as they are directly related to plans submitted to, and approved by the PDMO. You may leave this information in the plan, but as mentioned above, the Air Quality Program will only review and approve those activities that are required under the Air Quality rules and regulations and the requirements of Plan Approval 09-0241.

2.1 Location

- There are more residences near the site than are marked on the Receptor Location Map in Attachment 1. Please clearly indicate all the nearby potential receptor locations, or more clearly describe why you are only highlighting some of them.
- This section indicates that the wooded areas will serve as a natural buffer. It appears that at least some of these wooded areas are outside of your property and not under your control. The purpose of this plan, and the Asbestos Dust Mitigation Plan, is to keep the levels *at the property line* in compliance with all limitations. We ask that you either remove this reference from the plan or more clearly explain why it is there.

2.4 Permanent Crusher Plant Area Activities

- Processing washed aggregate can still cause fugitive emissions, depending on the circumstances. Please elaborate what equipment following the surge pile can be used that would not create fugitive emissions while processing washed aggregate.

3.0 Asbestos Air Sampling Locations

- On Page 8, the draft plan indicates that wind direction and speed will be monitored during each sampling event. Since these events will probably be extended, we would like specific indication of how often. It seems reasonable to do this at least every hour.
- What is considered an "extreme" change of wind direction? Could the final proposal be more specific about what circumstances would necessitate a change in sampling location?

4.0 Field Sample Collection Methodology

- Personnel monitoring for on-site workers, working near dust-generating conditions, may be regulated by other governmental agencies involving worker safety. Our review of any data collected from this monitoring will be used solely to determine if fibers are being generated at a closer proximity to the actual on-site activity and to determine if additional dust mitigation may be needed to prevent potential off-site migration.
- The 4th paragraph of the plan discusses the personal sample pump but not the perimeter pumps. Please include details about the type and specifications of the pumps used for perimeter monitoring.
- What will the turn-around time be for sample results?
- Will the site cease operations if there is a positive result for asbestos, either from personnel monitors or perimeter monitoring? If so, what will you do to ensure safe operation, prior to restarting?

4.1 Data Sheets

- We ask that the data sheet include meteorological information (wind direction, wind speed, temperatures, etc.)
- The sample analytical results do not seem to belong on the field data sheet. We prefer the sheet only include data taken in the field, at the time of the sampling.
- We request to add a check box for each sample taken to indicate if picture was taken for that sample location.
- We ask that you include a map with each sampling event with the approximate sampling locations clearly marked, not just the general area.

4.5 Weather and Wind Direction Data

- Please describe in detail the different monitoring procedures planned before and after the permanent weather station is operational.
- We request that you add a compass to the needed equipment for determining wind direction during sampling, unless other equipment is available to provide that information. If so, please indicate what that equipment would be.
- How often will you be recording the weather data, both before and after the permanent weather station is operational?

6.0 Analytical Methods

- The last paragraph references background "limit". Since there is no background limit, we believe it is more appropriate to call this the background level.
- Please be advised background levels cannot be subtracted from any results.

6.1 Analytical Laboratory

- Please ensure that any laboratory used is PA accredited.
- Please ensure the lab can provide a 24-hour turn-around time on results.

6.2.2 Duplicate Samples

- The last two sentences in this section seem to describe a re-sampling event, not duplicate samples. Duplicate samples must be taken at the same time, same location. If the intention is to do duplicate sampling as a QA/QC check, please revise this methodology. Please describe resampling procedures when a positive asbestos result occurs in its own section.

6.3 Field Equipment

- Please include wind and wind direction measurement equipment in this list and/or the permanent wind monitor station (after it is constructed).

7.1 Recordkeeping and Reporting

- Please keep all records for 5 years (regardless of permit terms) to match with the permit requirements.

7.2 Reporting

- Please indicate who the lab will be sending results to at RE Pierson. We ask that you commit to notifying DEP within 24 hours of the laboratory reported results. This should mirror the permit language currently in Plan Approval 09-0241, Section C, Condition #032(d)(2).
- Please provide DEP a minimum of two working day notice prior to the start of each sampling event and notify DEP as soon as possible if any sampling event has been cancelled. We ask that you contact us at 484-250-5920.

7.2.2 Weekly Summary Monitoring Reports

- Air monitoring results for the previous week should be submitted via e-mail to: RA-EPSEROAOREPORTS@pa.gov by the close of business on Monday of the following week.
- Since we don't know of the planned end to this procedure at this time, we request you change the wording from "final report" to "weekly report" and from "completion of the project" to "completion of the week".

7.2.3 Monthly Summary Monitoring Reports

- Air monitoring results for the previous month should be submitted via e-mail to: RA-EPSEROAOREPORTS@pa.gov within three working days following the receipt of the sample results for that month.

8.0 Corrective Actions

- We believe that corrective actions should include the possibility of shutting down the site if necessary. Please describe what would trigger this corrective action and what will be done prior to restarting operations to ensure the safety and wellbeing of those off-site.
- This section includes a statement that corrective action will only remain in place until 3 consecutive sampling events. Conditions impacting the sampling results will be highly variable (site activities, material processed, wind conditions, etc.). Due to this, 3 sample events alone may not be sufficient demonstration that corrective measures can be removed. Since there could be a need to continue corrective actions long term to ensure you stay below the action level, we ask that you remove this sentence and/or modify it allow for some input from DEP prior to ceasing any dust or asbestos abatement activities.

Water Suppression - Water Sources

Since the water used for dust control is coming from a surface source, and you are currently sampling the water under PDMO request. Please include in this section how often you intend to sample the water. Also, what action will be taken if a water sample comes back with a positive result for asbestos.

Exhibit 1 – Attachment 2 – Wind Rose Plots

- Is there more current wind rose data? This appears to indicate that it is from the 1960s.

Fugitive and Asbestos Dust Mitigation Plan

3.0 Fugitive Dust Emissions Sources/Factors

- Please address emission from drill rigs. We suggest that you indicate your commitment to maintain and use the following while drilling: water controls, particulate capture systems (like hoods, skirts and ducts) and/or particulate filters.

4.0 Fugitive Dues and Asbestos Mitigation Efforts

- Please describe what will qualify as a 'high wind day' and what extra efforts will be made.

4.1 Roadway Emissions

- Please indicate how many water trucks are permanently at the site. If they break down, is there an ability to call in another one? What will you do if all water trucks break down?
- We recommend that street sweepers always be run with water controls.

- The second bullet in the list could be interpreted to mean that water suppression might not be used on days when it is too cold to use water. If this is not the case, please clarify this portion. If a water truck cannot be used due to icing, what will be done? Surfactant? Recordkeeping of water truck use? Mileage? Please be aware, that weather conditions do not provide an exemption to fugitive emission regulations.
- Can you provide information on how much of the roads you are planning to pave, even if it is an estimate?
- Spillage of stone cleaned up "as soon as practical". Please elaborate on this, it would be preferable if drivers leaving the site were advised to notify site personnel of material on the roadway to ensure the cleanup is "as soon as practical".
- Please consider the options of using amended water or other dust suppressants on unpaved roads if necessary. It does not seem to be mentioned in this section.

4.2 Crushing and Screening Operation

- We suggest you model your discussion of the daily water system inspection on the requirements in Plan Approval 09-0241, Section D, Source C101, Condition #001(b).
- If they find a problem and repairs are needed, please reference Plan Approval 09-0241, Section D, Source C101, Condition #004, instead of "repairs will be made as needed".

4.3 Stone Handling and Stone Storage Area

- Please be aware that using amended water may be an option for unused areas of the property to control dust. You may want to add that to the last bullet point.

4.4 Blasting of Stone

- If dust is always created, then we would like to see you commit to always using the mister during blasting.

4.7 Employee Training

- A syllabus or training plan should be created for DEP review.
- We would like records to be kept of the employees who took the training (with dates).

5.0 Recordkeeping

- Please describe the procedures and frequency that there will be supervisor review of daily records to ensure compliance with all monitoring requirements.

Attachment 7: Daily Operation Log - Water Spray Inspection

- The description of what is to be checked here is not sufficient and does not contain what is required in Plan Approval 09-0241, Section D, Source C101, Condition #004. Please put the appropriate detail on these field inspection forms.
- Attachment 7: Daily Operation Log - Water Spray inspection – We would like to see a more detailed list of equipment that breaks out individual components that will be inspected (conveyor, crusher, screener) in more detail. This should help ensure that all water sprays are examined each time and make it clearer where problems are, if they are found.
- We would suggest separate sheets for separate equipment, especially the current portable crushers, since the plan is that they will eventually be removed from the site.

Jim

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Sent: Friday, December 21, 2018 6:16 PM
To: Rebarchak, James <jrebarchak@pa.gov>
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Subject: [External] Draft Ambient Asbestos Air Monitoring Plan and Asbestos Dust Mitigation Plan as Required under Plan Approval 09-0241

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Jim,

I was not sure if I would be able to scan this in for you today, however, I am attaching an electronic copy of the draft plans referenced above for your use. Please note that the Asbestos Dust Mitigation Plan is incorporated by referenced in the Monitoring Plan and is provided in Exhibit 1 of this document. We did send out an original and two copies in a binder for your review.

Thank you again for all of your time and assistance with this process. If you have any questions, please do not hesitate to contact me.

Mike

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