



October 13, 2019

The Honorable Patrick McDonnell  
Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101

Mr. Michael Kutney, P.G. Chief, Permits and Technical Section  
Department of Environmental Protection  
Pottsville District Mining Office  
5 West Laurel Boulevard  
Pottsville, PA 17901

Mr. John Stefanko, Deputy Secretary  
Active and Abandoned Mine Operations  
Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101

Mr. Gary Latsha, Inspector Supervisor  
Department of Environmental Protection  
Pottsville District Mining Office  
5 West Laurel Boulevard  
Pottsville, PA 17901

**Re: Response to PADEP September 20, 2019 Letter, Rock Hill Quarry, Hanson Aggregates Pennsylvania LLC, SMP # 7974SM1 East Rockhill Twp., Bucks Co., PA, prepared by the RJ Lee Group**

On behalf of Rockhill Environmental Preservation Alliance, Inc. (REPA), enclosed please find an October 13, 2019 report prepared by Erskine Environmental Consulting. The report presents many areas which are of extreme concern to us, especially since it is evident that NONE OF our reports thus far have been taken into consideration based upon the testing and reports we have seen.

The RJ Lee Group letter cites regulatory thresholds and implies that, because the under reported asbestos concentrations are below these thresholds, the presence of asbestos and its associated potential health impacts may be dismissed. **A fact remains: no regulatory or scientific agency has established, nor**

**advocates, a safe level of asbestos exposure.** It is rather concerning to REPA that the RJ Lee Group appears to be using an internal protocol for both PLM and TEM that **under reports the concentration of asbestos**. **Repeated deviations from test methods, misinterpretation of data, under reporting of asbestos levels and resulting non-compliance with NOA regulations in general, significantly increases the risk of exposure for workers, residents and school children to a known and dangerous carcinogen.**

Among other concerns in our three previous reports, we ask that you consider the following concerns outlined in our report attached:

1. The sampling methodology used by the RJ Lee Group letter is not consistent with standard of care for geologists, and appears to selectively remove most rocks from analysis.
2. The RJ Lee Group letter provides no indication that pre-project air sampling or project perimeter monitoring has been conducted or implemented.
3. The RJ Lee Group used inappropriate methodology to report the asbestos content as required by the acceptable EPA 600/R-93/116 test method for PLM and TEM.
4. The RJ Lee letter argues the appropriateness of using Polarizing Light Microscopy (PLM) for analysis by citing California and Nevada guidance documents. However, it neglected to point out the both California and Nevada utilize TEM, report “non-regulated” amphiboles, and non-amphibole asbestos minerals.
5. RJ Lee Group letter incorrectly argues that crystallization habit is the primary differentiator between asbestos vs. non-asbestos, and by inference, hazardous vs. non-hazardous.
6. The RJ Lee Group letter misrepresented the definitions and use of regulatory thresholds, incorrectly implying that levels below these thresholds are not regulated and considered safe by EPA and OSHA.

We are pleading with the DEP to take our expert’s reports into consideration. We understand the Rockhill Quarry is the ONLY quarry that resides in a RESIDENTIAL area (with hundreds of homes/THOUSANDS of students) where there is known asbestos.

Respectfully yours,

Rockhill Environmental Preservation Alliance, Inc.

cc: The Honorable Brian Fitzpatrick, U.S. Representative PA-01  
The Honorable Steven Santarsiero, 10<sup>th</sup> Senatorial District  
The Honorable Robert Mensch, 24<sup>th</sup> Senatorial District  
The Honorable Craig Staats, PA’s 145<sup>th</sup> Legislative District  
Steven Baluh, P.E  
Marianne Morano, East Rockhill Township Manager  
Amiee Bollinger PADEP



Virginia Cain, PADEP  
Robert Fogel, PADEP  
Erika Furlong, PADEP  
Craig Lambeth, PADEP  
Gary Latsha, PADEP  
Shawn Mountain, PADEP  
Patrick Patterson, PADEP  
James Rebarchak, PADEP  
Daniel Sammarco, PADEP  
Sachin Shankar, PADEP  
Richard Tallman PADEP  
Doug White, PADEP