



Sent via e-mail only

Hanson Aggregates Pennsylvania LLC
7660 Imperial Way
Allentown, PA 18195-1040
Tel 610-366-4600
Fax 610-871-5994

February 1, 2022

Richard Tallman, P.E.
Pottsville District Mining Office
Pennsylvania Department of Environmental Protection
5 West Laurel Boulevard
Pottsville, PA 17901

**Re: Revised Limited Activity Sampling Plan
Hanson Aggregates Pennsylvania LLC
Rock Hill Quarry
SMP No. 7974SM1
East Rockhill Township, Bucks County, PA**

Dear Mr. Tallman:

Enclosed, please find Hanson's revised Limited Activity Events Sampling Plan. Please consider the attached revised plan as a replacement to Attachment B in Hanson's December 6, 2021 response to the Department's Elevated Review Technical Deficiency Letter (October 21, 2021).

Hanson remains committed to working with the Department to allow the removal of the Cessation Order so that quarrying activities can resume at the Rock Hill Quarry

Regards,

A handwritten signature in blue ink, appearing to read "Andrew J. Gutshall".

Andrew J. Gutshall, P.G.
Area Environmental Manager

encl: as stated

cc: John Stefanko, PADEP (e-mail only)
Daniel Sammarco, P.E., PADEP (e-mail only)
Randy Shustack, PADEP (e-mail only)
Michael P. Kutney, P.G., PADEP (e-mail only)
Amiee Bollinger, PADEP (e-mail only)
Thomas Boretski, PADEP (e-mail only)
James Rebarchak, PADEP (e-mail only)

Sachin Shankar, P.E., PADEP (e-mail only)
Jillian Gallagher, PADEP (e-mail only)
Ashley Davis, PADEP (e-mail only)
Robert Fogel, PADEP (e-mail only)
Neil Shader, PADEP (e-mail only)
Virginia Nurk, PADEP (e-mail only)
Craig Lambeth, Esq., PADEP (e-mail only)
Marianne Morano, East Rockhill Township (e-mail only)
County of Bucks (e-mail only)
Rockhill Environmental Preservation Alliance (e-mail only)
Julie Goodman, PhD, Gradient Corp. (e-mail only)
Kelly Bailey, CIH, KBC LLC (e-mail only)
Bryan Bandli, PhD, RJ Lee Group (e-mail only)
Matthew Weikel, P.G., EARTHRES (e-mail only)
Joe Kim, P.E., EARTHRES (e-mail only)
Kristian Witt, CMI (e-mail only)
Mark E. Kendrick, Hanson (e-mail only)
Michael C. Lewis, CHMM, Hanson (e-mail only)
Timothy J. Poppenberg, Hanson (e-mail only)
Robert, J. Schena, Esq., Fox Rothschild LLP (e-mail only)
Environmental File

ATTACHMENT B

LIMITED ACTIVITY EVENTS SAMPLING PLAN

Introduction

The Pennsylvania Department of Environmental Protection (“DEP”) has requested that Hanson Aggregates Pennsylvania LLC (“Hanson”) propose this activity-based sampling plan that simulates limited activities at the Rock Hill Quarry (the “Quarry”). The limited activities outlined below reflect Hanson’s typical site maintenance and annual removal of 500 tons of stone at the Quarry. This document proposes the sequence of operations performed, the emission controls employed, and the air monitoring to be conducted.

Please note, crushing, processing, drilling, or blasting are not included in the limited activities proposed herein. Such activities and other future activities would require approval from the DEP before initiation. Applicable emission controls and monitoring, if necessary and different than those proposed herein, will be proposed at the time such activities occur.

Limited Activity Events

Hanson intends for its sampling events to occur during representative dry weather conditions. Hanson will provide DEP at least 48 hours advanced written notice prior to commencing any of the identified activities, and such notification will include the expected temperature and precipitation, if any, at the Quarry for each event. Schedule permitting, Hanson will avoid conducting any events during temperatures and/or precipitation events that will interfere with its intention to simulate dry weather conditions.

The following limited activity events are proposed:

1. Light truck and passenger vehicle movement around the site will be conducted for approximately two (2) hours. Two (2) or three (3) vehicles will travel at speeds less than 15 miles per hour (mph) and traverse the site roads during the event. The air sample collection will start early morning; however, the light truck and passenger vehicle movement will begin at approximately 10:00 am and will finish around 12:00 pm on the chosen day.
2. Equipment delivery (i.e., rubber-tire loader and water truck). Water truck will arrive first to wet roads. The rubber-tire loader will be delivered on a flat-bed trailer and unloaded. Other light truck or passenger vehicle traffic will occur on the site that day, obeying the maximum speed limit of 15 mph. The water truck will be present on-site during this limited activity event and will continue to be used as needed during this and subsequent simulated events.
3. Utilize the rubber-tire loader to transfer approximately 500 tons of material from an existing stockpile to a new stockpile location. Hanson will identify the stockpile locations in its written notification to DEP prior to commencing this activity.
4. Material transfer from pile to tri-axle trucks via rubber-tire loader for removal from the site. Approximately 23 tri-axle truck loads will be used to accomplish the 500-ton minimum removal. Equipment demobilization will be included in this event.
5. Site Maintenance Activities – Clearing of brush and road maintenance, as needed. Hanson has included this optional limited activity event because it is likely that refurbishment of site roads and/or clearing of brush at the site will be needed at some point in the near future.

Emission Controls for Sources:

Before each of the activities, Hanson or its representatives will inspect the site for road dust and relative conditions. The inspection will dictate the necessary actions to control emissions before

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any activity. Also, as part of Hanson's required pre-task tailgate meetings, discussion points of dust control, visible emissions, asbestos, and procedure for internal notifications and corrective actions in the event that emission controls are not adequate will be discussed with all workers.

As stated in Hanson's Asbestos Monitoring and Mitigation Plan (AMMP) dated July 6, 2021, submitted to DEP, the control measures to be employed are as follows:

1. Hanson will use a state-of-the-art street sweeper to clean paved roads before other equipment arrives at the Quarry during and after each limited activity, if deemed necessary.
2. All internal site roadways to be used during the limited activity will be adequately wetted using a water truck before any vehicle traffic, including tri-axle trucks and delivery of the equipment (i.e., rubber-tire loader).
3. The storage pile(s) will be adequately wetted in the area where the material will be removed during the loading activity.
4. The material will be loaded into the truck from the minimum drop height possible.
5. Via the water truck or equivalent methods, additional water application will be completed as necessary if the newly exposed aggregate shows signs of dryness.
6. Tri-axle truck wheels will be washed off using the water truck spray or other equivalent method before exiting the site.
7. Tri-axle truck loads will be properly tarped before exiting the site.
8. Water will be applied to control dust by increasing the moisture content of the material. Increasing the moisture content involves dust prevention, by preventing dust from becoming airborne, as opposed to dust suppression, which involves knocking down dust after it has already become airborne.

Sequence of Air Monitoring During Limited Activity Events

Hanson or its representatives will follow the air monitoring plan outlined in the AMMP.

Before any activity starts, monitors will be set up at the same eight (8) locations identified in Hanson's AMMP, which were used previously in the five (5) background sampling events conducted in 2021. Air sampling will be initiated before any activity starts in order to obtain the necessary air volume to establish required equipment accuracy. Air monitoring will occur during the five (5) proposed limited activity events: during (1) light truck movement, (2) equipment delivery, (3) stockpile movement, (4) the 500-ton removal event, and (5) if necessary, site maintenance activities. Wind direction and speed will be periodically recorded during all air monitoring events using a handheld instrument onsite and from the nearby Pennridge Airport.

1. Light Truck Movement

Air monitoring will be conducted during movement of light trucks around the site and for the remainder of the day to obtain necessary sample volume. Since the vehicles will be traveling at 15 mph or less, no wetting of the site roads is proposed. Only after the laboratory results are submitted to PADEP, reviewed and verified not to exceed the proposed action thresholds, will Hanson proceed with scheduling and implementing the subsequent limited activity event. If the results indicate an exceedance of applicable thresholds, Hanson will perform corrective actions in accordance with its AMMP.

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2. Equipment Delivery

Air monitoring will be conducted when equipment is delivered to the Quarry and for the remainder of the day to obtain the necessary sample volume. Only after the laboratory results are submitted to PADEP, reviewed and verified not to exceed the proposed action thresholds, will Hanson proceed with scheduling and implementing the subsequent limited activity event. If the results indicate an exceedance of applicable thresholds, Hanson will perform corrective actions in accordance with its AMMP.

3. Stockpile Movement

Air monitoring will be conducted during the movement of stockpiled material to a staging area to simulate loading of trucks for the subsequent 500-ton removal event. Monitoring will continue for the remainder of the day to obtain the necessary sample volume.

Wetting of the stockpiled material will be performed with the water truck or a small water pump and sprinkler. Only after the laboratory results are submitted to PADEP, reviewed and verified not to exceed the proposed action thresholds, will Hanson proceed with scheduling and implementing the subsequent limited activity event. If the results indicate an exceedance of applicable thresholds, Hanson will perform corrective actions in accordance with its AMMP.

During stockpile movement and removal of the 500 tons events, an observer trained in the visible emissions method will monitor site work to determine if any visible emissions are generated during any of the activities. If visible emissions are noted, the operations will be temporarily halted, and additional control measures will be implemented as appropriate. Once the control measures are considered adequate, the operations will resume.

4. 500-ton Removal Event

Following the initial three (3) initial limited activity events, Hanson will remove 500-tons from the staged stockpile at the Quarry, which is expected to take one (1) day.

Site activities during this limited activity operations event will include the following:

- Street Sweeper
- Driving equipment at Quarry (rubber-tired loader, tri-axle trucks, water truck)
- Use of equipment (i.e., material transfer from rubber-tire loader to tri-axle trucks)
- Use of water truck to wet aggregate piles, site roads and wash off tri-axle tires
- Loading the rubber-tire loader onto the flat-bed trailer and demobilizing from the site.
The rubber-tire loader will be washed off prior to loading and all truck tires will be washed off prior to leaving the site

As noted above, unless required and approved in advance by DEP, Hanson's activities will not include the crushing or processing of any aggregate materials, any blasting activities, or the use of drilling machinery.

As with the initial three (3) activities, Hanson or its representatives will perform air monitoring during the 500-ton removal event. Hanson will submit the results of the monitoring to the Department so that data can be reviewed and verified not to exceed the proposed action

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thresholds. If the results indicate an exceedance of applicable thresholds, Hanson will perform corrective actions in accordance with its AMMP.

During stockpile movement and removal of the 500 tons events, an observer trained in the visible emissions method will monitor site work to determine if any visible emissions are generated during any of the activities. If visible emissions are noted, the operations will be temporarily halted, and additional control measures will be implemented as appropriate. Once the control measures are considered adequate, the operations will resume.

5. Site Maintenance

An additional limited activity event that may need to occur consists of site maintenance work on quarry roadways or vegetation clearing. Air monitoring will be completed during this limited activity event. Hanson will apply water to site roads and materials (i.e. crushed aggregate) as needed to prevent potential dust from becoming airborne in areas where maintenance activities are occurring. Hanson anticipates utilizing small skid-steer equipment to accomplish site maintenance.

Note: If the results of air monitoring during any of the five (5) above-referenced limited activity events indicate an exceedance of the corrective action thresholds, the cause(s) will be investigated and corrective measures taken in accordance with Hanson's AMMP before any subsequent activity commences at the Quarry.