



Sent via e-mail only

**Hanson Aggregates Pennsylvania LLC**  
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August 9, 2022

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

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

Mr. Tallman:

Hanson Aggregates Pennsylvania LLC ("Hanson") provides this response letter to the Pennsylvania Department of Environmental Protection ("PADEP") regarding the status of Hanson's limited activity based sampling at the Rock Hill Quarry ("Quarry"). As requested by PADEP, Hanson is combining limited activity events 2 (equipment delivery) and 5 (site maintenance activities).

On the day of the sampling event, the following equipment will be delivered and operated at the site:

1. One (1) water truck
2. One (1) rubber tire loader

Hanson will perform the following activities:

1. Use the water truck as needed to wet Quarry roads to prevent dust during maintenance activities.
2. Once the roads have been wetted, use the rubber tire loader to repair Quarry roads, as appropriate. Hanson estimates that this activity will last two (2) to three (3) hours.
3. An observer trained and certified in visible emissions and opacity will monitor site work to qualitatively determine if any visible emissions are generated during the activities following USEPA Method 22 as guidance. If visible emissions are noted, the activities will be temporarily halted, and additional water will be added from the water truck. Once wetted, the activities will resume.
4. At the end of the maintenance activities, the rubber tire loader will be sprayed down with water from the water truck and all equipment will be demobilized from the site.

All activities will be performed in accordance with PADEP's July 13, 2022 letter. Hanson is currently monitoring the long-term weather forecast at the Quarry to identify a potential date for when it can implement these activities. Hanson will advise PADEP of the intended event date in writing.

Regards,



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

encl: July 13, 2022 PADEP Letter

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Environmental File

July 13, 2022

Hanson Aggregates PA, LLC  
Attn: Andrew Gutshall, P.G.  
Environmental Manager  
7660 Imperial Way  
Allentown, PA 18195-1040

Re: Limited Activity Sampling at the Rock Hill Quarry Site:  
Combined Second and Fifth Events  
Surface Mining Permit No. 7974SM1  
Rock Hill Quarry Operation  
East Rock Hill Township, Bucks County

Dear Operator:

The Department is in receipt of the results of the June 1, 2022 Activity Based Sampling Event 1: Light Truck Movement and the sample analysis showing a non-detect at each of the eight sampling stations.

Please proceed with Activity Based Sampling Event 2: Equipment Delivery in combination with Activity Based Sampling Event 5: Site Maintenance Activities.

Approval of these two combined activity-based sampling activities is contingent to the following conditions:

1. Please provide the list of the equipment that will be delivered and operated on the Rock Hill Quarry Site.
2. Please provide a description of the Site Maintenance activities and an estimate of the number of hours the Site Maintenance activities will take.
3. Please maintain continuous operation of the autonomous weather station at the Rock Hill Site to monitor and record wind speed, wind direction, humidity, temperature, and precipitation data prior, during and after the activity-based sampling.
4. Please conduct activity-based sampling only after three days of dry weather with no precipitation and do not conduct the sampling if these conditions are not met.
5. Please provide GPS vehicle tracking data logs for each vehicle or construction machine used in the Site maintenance activity event. Please include tracking data for the water truck and front-end loader (if used) during this event and other events.
6. Please schedule the “activity” portion of the activity-based sampling during the middle portion of the sampling period timeframe. Make every effort to balance pre-activity air sampling with post-activity air sampling.

7. Please conduct sampling with all eight air sampling monitors operating. Incomplete sampling results will nullify the activity-based sampling event.
8. The Department directs that the method of counting fibers is expressed below with the intent that this is the standard that shall be used when determining if corrective actions are needed to improve dust controlling Best Management Practices. The analytical methods and laboratory analysis for asbestos in air analysis to be utilized as part of 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  $\mu\text{m}$  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  $\mu\text{m}$  in width, as compared to the resolution for routine PCM (0.25 $\mu\text{m}$ ). 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".

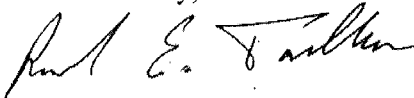
If the above analysis confirms asbestos fiber concentrations in excess of 0.01 fiber/cc in any sample, then corrective action requirements are triggered.

Hanson may choose to do comparative analyses and report the concentrations of Elongate Mineral Particles (EMP/cc) in the samples as described and proposed in the December 6, 2021 response to Item 4. Technical Deficiency 6 of the Department's October 21, 2021 comment letter. If Hanson chooses to do so, Hanson must provide the specific Standard Operating Procedure used to define an EMP in this analysis.

9. Please obtain the results from this activity-based sampling event and provide those results to the Department before conducting the next sampling event.

Should you have any questions, please contact this office.

Sincerely,



Richard E. Tallman, P.E.  
Environmental Engineer  
Bureau of District Mining Operations

cc: John J. Stefanko, Deputy Secretary  
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