



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

September 1, 2022

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

Re: Additional Conditions for the 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. In response to comments from East Rock Hill Township and other stake holders the Department requires the following additional conditions:

1. Please include eight additional air sampling monitors at the eight sampling points, run the additional samplers during the time the activity is occurring and set the sampling rate to match the duration of the activity.
For example: if the activity is to be projected to last 4 hours and your sample volume target is 1200 L, set the rate at 5 L/Minute or if the activity is to be projected to last 5 hours with a 1200 L volume target, set the sampling rate to 4/L/Minute.
The quantity of air sampled, and the grid openings counted in sample analysis must achieve the analytical sensitivity of 0.001 structures/cc.
2. Please report the number and dimensions of the grid openings on the sample filter examined and used to calculate the area analyzed in the Laboratory analysis.
3. Please include relative humidity on the Wind and Precipitation Data Sheets.
4. Please include Chain of Custody documents with the sample results along with the analyst bench sheets.

Approval of the two combined activity-based sampling activities remains contingent to the following conditions as previously stated on July 13, 2022:

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 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".

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

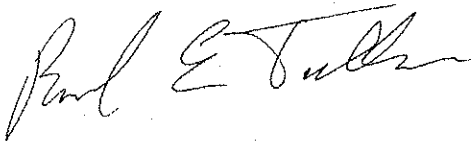
Hanson may choose to do comparative analyses and report the concentrations of Elongate Mineral Particles (EMP/cc) in the samples as described and proposed in the December 6, 2021 response to Item 4. Technical Deficiency 6 of the Department's October 21, 2021 comment letter. If Hanson chooses to do so,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

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

Should you have any questions, please contact this office.

Sincerely,



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

cc: Daniel Sammarco, P.E., Director DMO
John J. Stefanko, Deputy Secretary
Michael Kutney, P.G., EGM
Craig Lambeth, Office of Chief Counsel
Taylor Nezat, Legal Specialist 2
Randy Shustack, DMM
Daniel Koury, Watershed Manager
Thomas Boretski, SMCIS
Amiee Bollinger, SMCI
Patrick Patterson, SERO
Sachin Shankar, SERO
Jillian Gallagher, SERO
James Rebarchak, SERO
Ashley Davis, SERO
Neil Shader, Director of Communications
Rob Fogel, CRRC DEP
Marianne Morano, East Rockhill Township Manager
EarthRes Group, Inc., Consultant
MSI-Rockhill (8-22)

MPK:RET:cmb