



EAST ROCKHILL TOWNSHIP BOARD OF SUPERVISORS

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April 30, 2019

Michael Kutney, P.G. (via email)
Chief, Permits & Technical Section
Department of Environmental Protection
Pottsville District Mining Office
5 West Laurel Boulevard
Pottsville, PA 17901

Subject: Rockhill Quarry (Pierson Materials/Hanson Aggregates)
East Rockhill Township Second Set of Comments on Qualitative Geologic Survey
East Rockhill Township
File No. 11-225

Dear Mr. Kutney:

On behalf of East Rockhill Township, This office in conjunction with other Township Consultants, have reviewed the letter that was prepared by Earthres Group, Inc. ("Earthres") on behalf of Hanson Aggregates Pennsylvania, LLC, dated April 25, 2019 ("Earthres Response Letter"), which responds to the comments of the Pennsylvania Department of Environmental Protection ("DEP" or "Department") and East Rockhill Township ("Township") on the proposed Qualitative Geologic Survey Sampling Plan for the Rock Hill Quarry, prepared by Earthres, dated April 3, 2019 (the "Plan"). The Department sent comments on the Plan to Earthres on April 12, 2019, and Earthres responded to the Department via email on the morning of April 17, 2019. In its e-mail, Earthres informed the Department that it intended to begin water and aggregate sampling the following day. Later in the afternoon of April 17, 2019, the Township submitted its comments on the Plan to the Department via e-mail. Approximately thirteen minutes later, the Department partially approved the Plan to allow Earthres to proceed with water and aggregate sampling under the Plan without requiring Earthres to address the Township's comments on those issues. On April 22, 2019, the Department asked Earthres to address the Township's comments on the Plan, although by that time Earthres had already completed its water and aggregate sampling.

Please accept the following additional comments related to the April 25, 2019 Earthres response letter for consideration by the Department. The Plan continues to inappropriately focus on a limited area of study, and even for that purpose, the Plan is inadequate. The Township restates its position that a comprehensive geological analysis of the entire site is required at this time to understand the geology of the site and determine which areas may be safely mined, if any, or which areas require further study. The Township provides the following comments on Earthres's responses to the Department's and the Township's comments on the Plan:

Comments on Earthres's April 25, 2019 Responses to Department's Comments:

2. **Aggregates Handbook:** EarthRes has not addressed the Department's request to explain why the Aggregates Handbook is appropriate guidance for investigating mineral veins. Even now, the proposed locations are based on an assumption that the mineral veins continue in straight lines, and the proposed coring locations are located 50 to 175 feet away from the mapped faces. Earthres should state the level of confidence it has relied upon to locate the coring samples to confirm whether naturally-occurring asbestos ("NOA") is present, and the Department should similarly identify the level of confidence it requires Earthres to rely upon. The density of cores should be adjusted to provide that level of confidence. At present, based on the limited proposed number of cores, any conclusion that the benches do not contain NOA would have a very high level of uncertainty and a very low level of confidence.

3. **Mineral Vein Mapping:** EarthRes has not sufficiently described the mineral veins that are visible from the bench faces. The descriptions in the Bench Face Mapping Data Tables are limited to the width and color of the vein, and do not provide any description of the mineralogy therein. Furthermore, the mapping performed by EarthRes confirms that the number and location of the proposed corings are insufficient and that the proposed corings will not intercept a majority of the veins that are clearly visible on the bench faces, let alone the veins that may exist within the benches themselves. Based on Figure 1 in the Earthres Response Letter, at least mineral veins 2, 3, 4, 5, 6, 8, or 9, and perhaps others, would not be intercepted by the proposed corings and would therefore not be analyzed for NOA content. In fact, proposed coring B-2 would not intercept any mineral vein, which is contrary to Earthres's statement that the drilling locations and directions are designed to intercept as many mineral veins as practical. Each of the mineral veins that will not be intercepted by a proposed coring is described in the Bench Face Mapping Data Tables as containing either "white" or "whitish" colors which may be indicative of asbestiform minerals. In addition to coring, the Department should require Earthres to collect samples of each mineral vein at the face.
4. **Settled Dust:** The fact that the site has not operated since November 2018 is irrelevant to the issue of settled dust sampling. Surely, the Rock Hill Quarry still contains ample settled dust that could be sampled for NOA. Furthermore, Earthres has not provided a standard for determining when settled dust sampling would be "appropriate" in the future, and based on the insufficient characterization currently proposed in the Plan, it seems likely that Earthres will deem settled dust sampling inappropriate unless the Department requires it to be performed.

Comments on Earthres's April 25, 2019 Responses to Township's Comments:

2. **Aggregate Sampling Frequency:** If Earthres expects asbestos at the Rock Hill Quarry to be more heterogenous than asbestos typically found in Serpentine Aggregate, a higher sampling frequency is required than what is required by the California Air Resources Board Method 435 to confidently clear rock formations for mining. Again, based on the insufficient characterization currently proposed in the Plan, it seems likely that Earthres will deem future aggregate sampling inappropriate unless the Department requires it to be performed.
3. **Rock Coring and Sampling Location:** EarthRes has not addressed the Township's comments on the insufficient coring in the Plan. There are no controls in place to limit mining or blasting to the two target benches contemplated in the Plan, and therefore a comprehensive coring plan is required. Please see the Township's comment regarding the Department's comment #3, above. The Department has a duty to establish controls that are protective of human health and the environment. The area circumscribed by the four proposed corings is approximately 13,370 square feet or 0.3 acres. With a total mining area of approximately 2.4 million square feet or 55 acres, the four proposed corings would cover a mere 0.5% of the total area authorized for mining. The Plan inappropriately assumes, without providing any basis, that this extremely limited area is representative of the remainder of the site and that Earthres's decision to require future sampling would be based on its findings in this very limited area of the site.
4. **Rock Coring and Sampling Frequency:** Please see the Township's comments regarding the Department's comment #3 and the Township's comment #3, above. The adjusted drilling locations continue to be insufficient to characterize the material. Additional locations are necessary to intercept the suspect asbestiform veins which have already been identified though face mapping.
5. **Boulder Field Size and Location:** Without a description of the size and extent of the boulder field, it is impossible to determine whether the proposed sampling is sufficient. If the boulders truly are erosional remnants and/or were placed by historical mining, as Earthres states, the results of sampling a particular boulder cannot be directly attributable to the area in which the boulder is found. Sampling boulders in the boulder field is not a sufficient surrogate for mapping mineral veins and taking core samples in the boulder field.
6. **Boulder Field Sampling Bias:** We request that the Department staff member be a licensed professional geologist that has the training and experience necessary to identify potential asbestos-containing minerals.

7. **Wind Erosion of Aggregate Storage Piles:** Please identify the "air quality permit" that Earthres claims addresses air quality sampling. Please explain whether any of the background samples were collected on days with a wind velocity sufficient to erode the stockpiles. Please explain whether EarthRes or the owner/operator has evaluated the potential for wind erosion of the stockpiles.
9. **Water Sampling Locations:** Earthres has not sampled the "clarifying pond" and other adjacent small ponds located to the southeast of the main entrance to the Rock Hill Quarry.
10. **Sediment Sampling:** Earthres has described capturing suspended solids in water samples as a way to test sediment, but the primary concern is the potential for asbestos to have settled out of the water in the past into bottom sediment. Also, based on Earthres's comment that the site has not operated since November 2018, there is a lower likelihood that suspended solids from recent stormwater runoff from the site would be as representative as sediment sampling.
11. **Sampling Oversight:** Please confirm whether the Department staff member who conducted or directed sampling was trained and experienced in identifying potential asbestos-containing minerals.
12. **Potential for Asbestos Releases:** A CERCLA reportable release is not limited to Superfund sites.

The Township's position remains that the Plan is inadequate to delineate the presence of asbestos at the quarry and ensure that mining activities site will be protective of human health and the environment. We ask the Department to require Earthres to address each of the comments contained herein. Thank you for your consideration.

If you have any questions, do not hesitate to contact me.

Sincerely,



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SB/mew

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