
From: Kutney, Michael
Sent: Monday, April 22, 2019 11:05 AM
To: Louis Vittorio; Latsha, Gary; Andrew Gutshall; Curt Mitchell (cmitchell@repierson.com); Kendrick, Mark E (Allentown) USA; Mike Logan (mlogan@CPS-2Comply.com); Kelly Bailey; drew@rjlg.com; Marianne Morano; David Raphael; RGundlach@foxrothschild.com; Matthew Burns-
Cc: Bollinger, Amiee; Rebarchak, James; Tallman, Richard; Cain, Virginia; Fogel, Robert; Sammarco, Daniel; Stefanko, John; Shankar, Sachin; Lambeth, Craig; Furlong, Erika; Hamlin, Michele
Subject: RE: [External] Response to Comments - Rock Hill Quarry Sampling Plan
Attachments: CRWYNNDOC20190417145821.pdf; Excerpts from The Aggregates Handbook - 2nd Edition.pdf; NSSGA Mineral ID Guide.pdf

Lou-

I've reviewed the NSSGA Mineral ID Guide and excerpts from the Aggregates Handbook. Thank you for sharing them. I've reattached them for everyone's convenience, as well as comments from East Rockhill Township, which I will also be referencing.

Per our discussion on Friday, April 19, I voiced concerns regarding the Department's (core drilling) comments nos. 1, 3, and 4. It was my position that the those had not been adequately addressed and therefore, the Department would not authorize core drilling until those comments are adequately addressed. Below is a summary of those concerns, as well as additional comments resulting from a review of the attached documents.

The Aggregates Handbook appears to be geared toward characterization of the aggregate deposit, not investigating unfavorable components within it (in this case veins which may contain asbestos). Using its guidance for the purpose of investigating mineral veins seems inappropriate. Please explain why following the guidance in the Aggregates Handbook is appropriate in this case (PADEP comment #3).

Both the NSSGA Guide and the Aggregates Handbook encourage a proper mapping effort as part of the investigations described in these documents. The Department has notified Hanson during the December and February meetings and during other discussions that it expects the veins at the Rock Hill quarry to be mapped and described. To date, the Department has not received any information from Hanson regarding the mapping effort or its results. Results from a comprehensive mapping effort could effectively answer the Department's comments #1, #3 and #4 regarding the core drilling as well as East Rockhill Township's comment #4.

The NSSGA Guide also describes a program for testing for Settled Dust. Please explain why testing for Settled Dust has not been proposed for this site.

Please address the comments from East Rockhill Township dated April 17, 2019 (attached).

If you have any questions, please contact me at 570.621.3470.

-Mike

Michael Kutney, P.G. | Chief, Permits & Technical Section
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From: Kutney, Michael
Sent: Friday, April 19, 2019 4:01 PM
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Subject: RE: [External] Response to Comments - Rock Hill Quarry Sampling Plan

Lou-

Per our discussion earlier today, the Department still has concerns regarding the proposed core drilling. Core drilling at the Rock Hill quarry is not authorized until Hanson receives written approval of the core drilling plan from the Department. No drilling is to occur on Monday, April 22, 2019.

A summary of the Department's comment will follow under a separate cover. If you have any questions, please contact me 570.621.3470.

-Mike

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Sent: Friday, April 19, 2019 9:23 AM
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Bailey <kfbcih@gmail.com>; drew@rjlg.com; Marianne Morano <MMorano@EastRockHillTownship.org>; David Raphael <dave.raaphael@klgates.com>; RGundlach@foxrothschild.com; Matthew Burns <matthew.burns@lehighhanson.com>
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Subject: RE: [External] Response to Comments - Rock Hill Quarry Sampling Plan

Gary:

Per the Department's partial approval of the April 3, 2019 Rock Hill Quarry Qualitative Geologic Survey Sampling (QGSS) Plan, and my subsequent telephone discussion with Mike Kutney of your office, I am providing the following additional information as requested to enable commencement of the proposed core drilling program on Monday, April 22, 2019. I have also attached two reference documents that were used as a guide in developing the drilling and sampling program.

Mr. Kutney requested additional clarification on my response to Comment #1 regarding the core drilling program. The program is specifically targeted to look for mineral veining and the drilling is therefore biased towards assessing the presence of NOA in that manner. Based upon the potential NOA mineral veins that are identified and sampled, and the results of the sampling, a concentration of fibrous NOA (if found) will be calculated for the volume of each rock core.

However, the proposed core drilling is not a standalone program, and the results from the drilling will be used in conjunction with previously collected data (i.e. air, water and rock sampling results), and the current data being collected per the QGSS Plan, which is not insignificant, to assess the presence of NOA at the site.

The core drilling and sampling currently being conducted is part of an ongoing systematic process. The resultant data will be assessed to see if additional drilling and sampling is warranted. This approach follows the assessment steps provided under "B. Qualitative Geologic Survey for Existing Sites" contained in the NSSGA Mineral Identification and Management Guide (attached).

We look forward to commencing the drilling program and providing the results to the Department.

Regards,

-Lou

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Sent: Wednesday, April 17, 2019 3:46 PM

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Subject: RE: [External] Response to Comments - Rock Hill Quarry Sampling Plan

Andrew & All; The Department has reviewed the Qualitative Survey Sampling Plan (Plan), dated April 3, 2019 and your responses to the Department's request for additional information dated April 12, 2019. Therefore, the Department will conditionally/partially approve the Plan to resume sampling for naturally occurring asbestos in the water and aggregate storage piles referenced in the Plan. The Department will be requesting additional information regarding the proposed core drilling. Therefore, core drilling is not authorized as part of this conditional/partial Plan approval. If you have any questions please let me know.

Gary

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From: Louis Vittorio <lvittorio@earthres.com>

Sent: Wednesday, April 17, 2019 6:46 AM

To: Kutney, Michael <mkutney@pa.gov>; Menghini, Michael <mmenghini@pa.gov>; Latsha, Gary <galatsha@pa.gov>; Bollinger, Amiee <ambollinge@pa.gov>; Rebarchak, James <jrebarchak@pa.gov>; Tallman, Richard <rtallman@pa.gov>; Cain, Virginia <vicain@pa.gov>; Fogel, Robert <rofogel@pa.gov>; Sammarco, Daniel <dsammarco@pa.gov>; Stefanko, John <jstefanko@pa.gov>; Shankar, Sachin <sshankar@pa.gov>; Lambeth, Craig <clambeth@pa.gov>; Furlong, Erika <erfurlong@pa.gov>

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Subject: [External] Response to Comments - Rock Hill Quarry Sampling Plan

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Mike:

Thank you for your comments dated April 12, 2019 pertaining to the submitted *Qualitative Survey Sampling Plan* for the Rock Hill Quarry site. On behalf of Hanson Aggregates Pennsylvania, LLC (Hanson), I am providing the following comment responses (*in italic font*):

Regarding the existing stockpiles:

1. The chosen sampling approach uses AASHTO R90. According to the AASHTO R90 method, sampling of stockpiles should be avoided due to problems involved in obtaining a representative gradation of material. Please explain why this is the best choice available for sampling the stockpiles.

AASHTO R90 provides sampling methods for aggregates from: (a) source production (e.g. from conveyors at the crusher), (b) in-place end product (roadways), or (c) stockpiles. Note 3 in the AASHTO R90 method essentially states that when methods/locations (a) and (b) are available for sampling, they are preferred in lieu of stockpile sampling to assure a representative gradation of material is obtained. As sampling of the existing stockpiles is required, a provided AASHTO R90 stockpile sampling method is proposed to be used. Specifically, the sampling is proposed to be conducted with Stockpile Method A. The method requires using a Front End Loader to dig into the pile to obtain a representative sample of the aggregate gradation in place. In regards to the gradation concern, the sampling will entail the collection of samples from piles having differing gradations, including 2B, 1B, and 2A stone and screenings.

Regarding the rock core drilling:

- 1. A drilling program typically has a goal or target. What are the targets or goals in this case? How will success be determined?**

The goal of the drilling program is to further evaluate the presence or absence of trace amounts of naturally occurring asbestos (NOA) in the rock to be mined. Success will be determined through laboratory analysis for NOA in the mineral vein samples identified in the cores as specified in the work plan.

- 2. Please provide additional explanation for the planned azimuth and dip angle of the drilling. Please explain why the proposed azimuth and dip angle are thought to be the most likely to intercept asbestos-bearing features?**

The dip angle of the proposed borings was chosen to maximize the potential to intercept veining, which is indicated to be near vertical from current observations. The azimuth of the drilling program was chosen to be perpendicular to regional geological strike, which is also coincident with the orientation of the diabase ridge. In the extensional geological rift environment that existed during diabase emplacement, the diabase was intruded along geological strike. The strike direction is also perpendicular to the extensional forces that enabled diabase emplacement. Through drilling in the direction perpendicular to the regional geological strike (and parallel to extensional forces), the coring is more likely to cross mineral veins and/or bedding features (i.e. heterogeneities) that may exist in the rock.

- 3. Please explain the basis for the number of core holes and their spacing.**

Core drilling was proposed based upon guidance contained the Aggregates Handbook (NSSGA, 2013, Alexandria, VA, 2nd edition). Typical spacing recommended therein is much larger than proposed (e.g. 1 per four acres). For the current program, we are proposing targeted, oriented core holes (see our response to Comment #2) spaced approximately 50-ft to 70-ft apart on two separate benches. The actual locations of the core holes will be adjusted based upon field conditions (see our response to Comment #4 below). Based upon the results of the coring, including consideration of rock homogeneity and the NOA sampling results, more or less coring will be proposed for future operations.

- 4. It would seem prudent to perform a field investigation of the mineral vein orientations and spacing before launching a drilling program to investigate them. The number and orientation of the drill holes could change based on the findings. If it is determined that the drilling was directed in a sub-optimal orientation, the Department may require additional drilling.**

Per the Department's request, mineral veins visible in the highwalls in the proposed drilling area will be mapped where safely possible to guide the selection of core hole locations, and drilling dip and azimuth.

- 5. Please include any lithologic contacts as part of the field logging and identifying procedures.**

Per the Department's request, any lithologic contacts encountered will be included on the core logs to be prepared as specified in the work plan.

Regarding the water bodies:

1. Please sample all of the sediment traps on the permit in addition to the other water bodies already proposed.

Per the Department's request, the sediment traps in the permit area in addition to the other water bodies proposed will be sampled as specified in the work plan.

The Department would like to be on site for all sampling events. Please provide the schedule for sampling as soon as possible.

It is our intention to commence water and aggregate sampling on Thursday April 18th. Core drilling is to commence April 22nd.

If you have any questions, please contact me or Andrew Gutshall of Hanson at your convenience.

Regards,
-Lou

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From: Kutney, Michael [<mailto:mkutney@pa.gov>]

Sent: Friday, April 12, 2019 3:51 PM

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Subject: RE: [External] Rock Hill Quarry Sampling Plan

Lou-

The Department has reviewed the Qualitative Survey Sampling Plan, dated April 3, 2019, and has the following comments:

Regarding the existing stockpiles:

1. The chosen sampling approach uses AASHTO R90. According to the AASHTO R90 method, sampling of stockpiles should be avoided due to problems involved in obtaining a representative gradation of material. Please explain why this is the best choice available for sampling the stockpiles.

Regarding the rock core drilling:

1. A drilling program typically has a goal or target. What are the targets or goals in this case? How will success be determined?
2. Please provide additional explanation for the planned azimuth and dip angle of the drilling. Please explain why the proposed azimuth and dip angle are thought to be the most likely to intercept asbestos-bearing features?
3. Please explain the basis for the number of core holes and their spacing.
4. It would seem prudent to perform a field investigation of the mineral vein orientations and spacing before launching a drilling program to investigate them. The number and orientation of the drill holes could change based on the findings. If it is determined that the drilling was directed in a sub-optimal orientation, the Department may require additional drilling.
5. Please include any lithologic contacts as part of the field logging and identifying procedures.

Regarding the water bodies:

1. Please sample all of the sediment traps on the permit in addition to the other water bodies already proposed.

Regarding the boulder field sampling:

No comments

The Department would like to be on site for all sampling events. Please provide the schedule for sampling as soon as possible.

If you have any questions, please contact me at 570.621.3470.

Sincerely,

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From: Louis Vittorio <lvittorio@earthres.com>

Sent: Wednesday, April 3, 2019 6:24 PM

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Subject: [External] Rock Hill Quarry Sampling Plan

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Mike:

On behalf of Hanson Aggregates Pennsylvania, LLC (Hanson), Earthres Group, Inc. is providing the following Qualitative Geologic Survey Sampling Plan for continued assessment of Naturally Occurring Asbestos (NOA) at the Rock Hill Quarry Operation.

Upon approval, Hanson is prepared to commence sampling at the site. In the meantime, should you have any questions, please contact me or Andrew Gutshall of Hanson at your convenience.

Regards,
-Lou

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