

November 18, 2020

Hanson Aggregates PA, LLC
Attn: Andrew Gutshall, P.G.
7600 Imperial Way
Allentown, PA 18195

Re: Technical Deficiencies
Application No. 7974SM1C10
Rock Hill Quarry Operation
East Rock Hill Township, Bucks County

Dear Mr. Gutshall:

The Pennsylvania Department of Environmental Protection has received your May 29, 2020 response to comments and data submissions and the additional testing data submitted on August 14, 2020. The information in both submissions is still under review.

It is the Department's understanding that R.E. Pierson Materials, Corp., P.O. Box 704, Bridgeport, N.J. 08014 has chosen to terminate its contractor relationship with Hanson Aggregates and the Rock Hill Quarry.

As the Department continues to evaluate the Naturally Occurring Asbestos at the Rock Hill Quarry, the change of relationship with the former contractor will require updates to the following permit modules in the existing permit update application received on February 20, 2018.

1. Module 3: Ownership/Compliance Information
 - a. Please update Module 3.2: Contractor §77.162 (a)(1)(iii)
2. Module 9: Operations Map
 - a. Please provide an updated Operations Map showing the aerial extent of affected lands on the Rock Hill Permit, the length(s) of affected pre-act highwalls and newly created highwalls. §77.454
 - b. Please delineate or identify the areas that would be affected and the way (active, reclaimed, revegetated) they would be affected through current and intended operations. §77.454, §77.452
3. Module 10: Operational Information
 - a. Please update Module 10.1: Equipment and Operation Plan to reflect current and intended operations at the Rock Hill Quarry. §77.452 (2)(iii)
 - b. Please update Module 10.8: Special Handling of Toxic Material
 - i. Please present a comprehensive and detailed plan to safely handle Naturally Occurring Asbestos wherever it may be encountered in the diabase host rock, in the produced aggregate, or in the overburden at the Rock Hill Quarry. §77.130 (1)

- c. Please update Module 10.15: Bonding Calculations
 - i. Please provide a detailed plan to accomplish reclamation of the current reclamation obligations at the Rock Hill Quarry. Specifically, describe the selected method(s) that would be used to reclaim affected pre-act or newly created highwalls. §77.456
 - ii. Please provide an addendum to the bonding calculations reflecting the current reclamation obligations at the Rock Hill Quarry. §77.202, §77.456 (2)
4. Module 17: Air Pollution and Noise Control Plan
 - a. Please update Module 17 to reflect current and intended operations at the Rock Hill Quarry. Specifically, describe in detail measures that will be taken to prevent dust and Naturally Occurring Asbestos from crossing the permit boundary. §77.455 (1)
 - b. Please provide a comprehensive Naturally Occurring Asbestos Monitoring and Mitigation Plan covering all present and potential operations at the Rock Hill Quarry. §77.455 (1), §77.575 (2)
 - i. Please address all concerns expressed by the Pennsylvania Department of Health in its September 16, 2020 letter to the Pennsylvania Department of Environmental Protection. §77.122 (b)
 - ii. Please include a detailed air monitoring and dust suppression plan.
5. Module 18: Land Use and Reclamation Map
 - a. Please update the Land Use and Reclamation Map to reflect the current status of the Rock Hill Quarry. §77.456
6. Module 20: Post-Mining Land Use & Reclamation
 - a. Please update Module 20.3 to reflect the current status of the Rock Hill Quarry and provide an explanation of how reclamation of affected areas would be accomplished including grading of affected pre-act or newly created highwalls to a maximum 35° slope. §77.462 (2), §77.456 (3)

Should you have any questions regarding the identified deficiencies, please contact me to discuss your concerns or to schedule a meeting. Please respond to all the deficiencies listed above by January 15, 2021. Also, please note that due to the application deficiencies noted above, the Permit Decision Guarantee timeframes are no longer applicable.

Sincerely,



Richard E. Tallman E.I.T.
Civil Engineer (General)
Bureau of District Mining Operations

cc: John J. Stefanko, Deputy Secretary
Daniel Sammarco, P.E., Director DMO
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