

October 6, 2020

Rockhill Environmental Preservation Alliance, Inc.
703 W. Market Street
Perkasie, PA 18944

Re: REPA and EEC comments regarding the analysis of Rock Hill Quarry water and rock samples due August 14, 2020 and September 1, 2020 and East Rock Hill Township letter September 17, 2020

Hanson Aggregates PA, LLC
Surface Mining Permit No. 7974SM1
Rock Hill Quarry Operation
East Rockhill Township, Bucks County

REPA Members:

The Pennsylvania Department of Environmental Protection (Department) has received the testing results of the seven water samples conducted according to EPA Method 100.1 without modification and the TEM re-analysis of the fifty-seven rock and aggregate samples utilizing the more inclusive multiple methodologies of EPA 600/R93/166, ISO 22262 and ISO 10312. We also received petrographic analysis of three rock samples. The Department is presently reviewing and evaluating these results.

This extensive testing effort and the methodologies under which it was conducted is the Department's effort to have Hanson and its consultants provide an inclusive data set that can be analyzed to determine naturally occurring asbestos amounts in the rock samples and to ultimately characterize the geology of the Rock Hill Quarry rock deposit.

This testing and data collection have been done on the same water and rock samples that were gathered for the previously submitted Qualitative Geologic Survey Report (QGSR) dated November 19, 2019. The Department approved sampling plan, the sampling/drilling location(s), and the methods of their collection are described in that report. In addition, Department representatives were on site for the sampling to ensure adherence to the sampling plan.

The submitted QGSR generated numerous questions and comments from the Department and the public. The Department carefully considered the comments, which led to the re-analysis of those same samples to allow the Department and the public to compare the previous results submitted under the November 19, 2019 report with the results of the more recent extensive and inclusive testing protocols. The Department may yet require additional sampling and testing depending on the review of the August 14, 2020 results.

The Department appreciates the comments and concerns that citizens have raised regarding the reliance on test results provided by Hanson. However, the Department relies on the applicant to submit any information that the Department may require as per 25 Pa. Code § 77.104(b):

An application for a permit shall be accompanied by information, maps, plans, specifications, design analyses, test reports and other data as may be required by the Department to determine compliance with the standards, requirements or purposes of this chapter.

This regulation places the burden on the applicant to provide information as opposed to the Department. It is then the Department's responsibility to evaluate and/or request additional information as needed.

The Department understands the Rock Hill community's frustration with the slow process of decision making regarding the Rock Hill Quarry. It is the Department's responsibility to investigate and evaluate all available information to ensure an environment that will protect all Pennsylvania's citizens from naturally occurring asbestos once it has been fully evaluated at this site. The Department takes this responsibility seriously.

Thank you again for your inquiry.

Sincerely,



Gary A. Latsha
District Mining Manager
Bureau of District Mining Operations

cc: John J. Stefanko, Deputy Secretary
Dan Sammarco, Director DMO
Michael Kutney, P.G., EGM
Craig Lambeth, Office of Chief Counsel
Patrick Patterson, SERO
Sachin Shankar, SERO
James Rebarchak, SERO
Shawn Mountain, SERO
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