



February 28, 2022

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

Revised Limited Activity Events Sampling Plan at the Rock Hill Quarry Site

Re: Surface Mining Permit No. 7974SM1
Rock Hill Quarry Operation
East Rock Hill Township, Bucks County

Dear Mr. Gutshall:

The Department is in receipt of your Revised Limited Activity Events Sampling Plan dated February 1, 2022. The following limited activity events of the proposed plan are approved: Nos. 1. Light Truck Movement, 2. Equipment Delivery, 3. Stockpile Movement, and 5. Site Maintenance. The execution of limited activity event: No. 4. 500-ton removal event is not approved. The approval of limited activity event No. 4 will be determined after the results of the other limited activity events have been reviewed and evaluated by the Department.

Approval of this plan is contingent to the additional conditions:

1. Please install an autonomous weather station at the Rock Hill Site to monitor and record wind speed, wind direction, humidity, temperature, and precipitation data prior to activity-based sampling. Weather condition data shall be recorded on a weather station data logger and real-time data should be available for review on the station display panel.
2. Please commit to conducting 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.
3. Please provide GPS vehicle tracking data logs for each light truck and passenger vehicle (3 vehicles) for the light truck and passenger vehicle activity-based sampling event. Please include tracking data for the water truck and front-end loader (if used) during this event and other events.
4. 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.
5. Please conduct sampling with all eight air sampling monitors operating. Incomplete sampling results will nullify the activity-based sampling event.
6. 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.

7. Please obtain the results from each activity-based sampling event and provide those results to the Department before conducting the next sampling event.

Should you have any questions, please contact this office.

Sincerely,



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

cc: John J. Stefanko, Deputy Secretary
Daniel Sammarco, P.E., Director DMO
Michael Kutney, P.G., EGM
Craig Lambeth, Office of Chief Council
Randy Shustack, DMM
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

Virginia Cain, SERO
Rob Fogel, CRRC DEP
Marianne Morano, East Rockhill Twp., Manager
EarthRes Group, Inc., Consultant
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