



Sent via e-mail only

Hanson Aggregates Pennsylvania LLC
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June 14, 2021

Richard Tallman, P.E.
Pottsville District Mining Office
Pennsylvania Department of Environmental Protection
5 West Laurel Boulevard
Pottsville, PA 17901

**Re: Rock Hill Quarry
Hanson Aggregates Pennsylvania LLC
SMP # 7974SM1
East Rockhill Twp., Bucks Co., PA**

Mr. Tallman:

We are in receipt of a letter from the Pennsylvania Department of Environmental Protection (PADEP), dated April 12, 2021, requesting additional information in response to the request of Hanson Aggregates PA LLC (Hanson) to withdraw the cessation order regarding operations at the Rock Hill Quarry.

By way of brief background, by letter dated January 15, 2021, Hanson responded to your prior letter, dated November 18, 2020, requesting operational information. In our January 15, 2021 response, we indicated that it was Hanson's intent, at least for the short term, to limit our mining operations at this quarry to 500 tons per year to maintain an active mining license. This would involve us removing aggregate from the on-site stockpiles 1 to 2 days per year. However, in your April 12, 2021 response to our submittal, you requested information that went, in our opinion, far beyond the proposed limited short term activity that Hanson intended for this property. It is Hanson's understanding that the information requested by DEP will apply to our operation regardless of whether Hanson is mining once or twice a year or more frequently, such as on a weekly or daily basis. Given that, it is Hanson's plan to now provide information, in response to your April 12, 2021 letter, to address "full" quarry operations. Hanson believes that the information it is providing to the Department will fully address activities associated with both a limited 500 ton aggregate removal scenario and full quarry operations under its mining permit (e.g., operations plans, engineering controls, monitoring, sampling, and corrective actions).

To be clear, full quarry operations will likely include stripping overburden from areas within the permitted mining boundary, drilling, blasting, hauling, crushing, stockpiling, and loading out crushed aggregate to our customers. In providing this information, Hanson acknowledges that some of the noted "full" quarry operations may in the future include activities that entail additional permitting action(s) and approval(s) by PADEP

prior to their commencement. Given that, when appropriate, Hanson will communicate with PADEP any plan to advance beyond the currently anticipated 500-ton removal operations and will submit to PADEP all necessary information, permit application(s), and/or permit revision(s) prior to commencing any quarry activities that are not addressed under Hanson's current Large Noncoal Surface Mining Permit.

As to responding to DEP's April 12, 2021 letter, the necessary level of responsiveness will require additional time to complete, specifically to allow for on-site background air sample collection and several technical experts to assist us in responding to DEP's letter, including by providing the following requested information:

1. Site-Perimeter Background Air Sample Collection;
Anticipated Time to Complete: 6-8 weeks.
2. Toxicological Assessment of NOA.
Anticipated Time to Complete: 4 weeks after completion of Air Sample Collection. Performance of this assessment will first require that Hanson collect relevant NOA data at the Hanson facility.
3. Analysis of Overburden Materials.
Anticipated Time to Complete: 4-6 weeks.

Hanson has engaged the following experts to assist with the work required to provide the information requested in your April 12, 2021 letter, including as to full quarry operations:

1. Matthew Weikel, P.G., and Joe Kim, P.E. – Earthres Group, Inc.
 - *Geologist and Engineer*
2. Kristian Witt – Compliance Management International
 - *Comprehensive dust suppression and air monitoring.*
3. Kelly Bailey, CIH, FAIHA – Kelly Bailey Consulting, LLC
 - *Certified Industrial hygienist*
4. Bryan Bandli, Ph.D – R.J. Lee Group
 - *Scientific consulting and laboratory testing*
5. Julie E. Goodman, Ph.D and Anna Engel – Gradient Corp.
 - *Toxicologist and epidemiologist*

In working with these experts, we intend to respond to the items set forth in the April 12, 2021 letter and provide the following work product:

1. Asbestos Monitoring and Mitigation Plan;
2. Mineral Identification and Management Guide;
3. Revisions (as necessary) to Hanson Permit Modules; and
4. Where necessary, direct answers to comments in the April 12, 2021 Department letter.

Considering Hanson's intention to address full quarry operations, please advise us of any additional topics that should be addressed in Hanson's reply.

Finally, given the extensive work that is required in order to properly address all topics raised in your April 12, 2021 letter, and reply to any additional information you may now require in response to Hanson's plan to resume full quarry operations, we respectfully request that the deadline to make this submission be extended from July 6, 2021 to October 29, 2021.

Please be assured that Hanson takes this matter very seriously and intends to provide a detailed response to your April 12, 2021 letter. We ask that you grant this continuance to give us the proper time to do so. Feel free to contact me at (610) 366-4819 should you wish to discuss this submission.

Regards,



Andrew J. Gutshall, P.G.
Area Environmental Manager



Catherine Stehlin
Associate General Counsel –
Northeast Region

encl:

cc: John Stefanko, PADEP (e-mail only)
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