

September 14, 2022

Bucks County
Office of the Commissioners
55 East Court Street, 5th Floor
Doylestown, PA 18901
County Commissioners:
Robert J. Harvie Jr. Chair
Diane M. Ellis-Marseglia, LCSW Vice Chair
Gene DiGirolamo, Secretary

Dear Commissioners:

Thank you for your comments regarding the Pennsylvania Department of Environmental Protection's (DEP) Activity Based Sampling Plan at the Rock Hill Quarry in East Rock Hill Township, Bucks County, PA.

In your letter, you cited concerns about dilution of the sample resulting in sampling not representative of the activity, sampling monitors not being downwind of the activity and the non-reporting of humidity levels.

Dilution of the sample and sampling not representative of the activity:

Hanson's first round of activity-based sampling was drawn over a 9-hour period. In accordance with DEP direction, Hanson's sampling was performed after at least three days of dry weather with no precipitation to allow for a worst-case scenario/possible dusty conditions.

Normal activities during quarry operations involve dust suppression which would include watering the roads. Dust suppression was not conducted during sampling before the vehicles were driven over the road to allow for a worst-case scenario/possible dusty conditions. DEP assumes that if any asbestos fibers were present, the amount of fibers being released into the air from the vehicles being driven over dry roads would be higher than during normal activities.

However, considering your concerns and the concerns of other Pennsylvanians, DEP will require Hanson to perform sampling in accordance with the approved sampling plan and also at a higher flow rate at all sampling locations matching the timeframe when the activity is occurring.

Sampling locations not downwind of the activity.

The eight sampling monitor locations have been chosen as they surround the quarry to determine if dust crosses the permit boundary <u>regardless</u> of the wind direction. This means that some locations may be upwind of the activity while others will be downwind. DEP cannot predict

downwind locations and has determined that surrounding the quarry at eight separate points is the best practice.

Humidity reporting:

DEP insisted that Hanson install an autonomous weather recording station at the Rock Hill Quarry which was installed on May 9, 2022. The autonomous weather station records temperature, wind (direction, wind speed and wind gusts), barometric pressure, rainfall, dew point, and humidity. Humidity has since been reported for the June 1, sampling event and will be included in all subsequent sampling reports.

DEP has been transparent and will continue to take diligent consideration of the concerns of the residents and health experts and we will maintain that practice before making any determination regarding the future of quarry operations at the Rock Hill Quarry.

Should you have any additional questions, please contact Taylor Nezat, Acting Director of Legislative Affairs, by email at tnezat@pa.gov or by telephone at 717.783.8303.

Sincerely,

John J. Stefanko
Deputy Secretary

Active and Abandoned Mine Operations



Office of the Commissioners 55 East Court Street, 5TH Floor Doylestown, PA 18901

County Commissioners
Robert J. Harvie Jr., Chair
Diane M. Ellis-Marseglia, LCSW, Vice Chair
Gene DiGirolamo, Secretary

August 25, 2022

SECRETARY'S OFFICE

Ramez Ziadeh, Acting Secretary
PA Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17120-0225

SEP - 9 2022

DEPARTMENT OF ENVIRONMENTAL PROTECTION

RE: Rockhill Quarry Testing

We are writing to express our concerns regarding the testing procedures being conducted by Hanson at the Rockhill Quarry in East Rockhill Township. In our June 16, 2021 letter to then PADEP Secretary Patrick McDonnell, the Commissioners highlighted what we viewed as health risks to residents if quarry operations resumed due to the presence of naturally occurring asbestos.

The flawed sampling methodology conducted by Hanson to gauge the level of asbestos should be corrected to accurately represent quarry activity. According to reports by East Rockhill Township, the sampling conducted by Hanson was diluted and not representative of the activity that was intended to be analyzed, half the monitors were not downwind of the activity, and humidity levels were not reported.

Before additional activity at the quarry is authorized, these flaws in Hanson's sampling methodology must be addressed. The Bucks County Commissioners are committed to the health and safety of its residents and will continue to monitor this situation closely.

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Sincerely,

Robert J. Harvie Jr., Chair

Diane M. Ellis-Marseglia, Vice Chair Gene DiGirolamo, Secretary