Attachment F - Part 1
Water Sampling Results (May-July 2019)
Mr. Kevin Moore  
Senior Manager, Mine Planning & Capital  
Specialty Granules LLC  
13424 Pennsylvania Ave  
Suite 303  
Hagerstown, MD 21742  

Re: NPDES Permit Application Sampling  
Lower Mill, Charmian Plant  
Blue Ridge Summit, Pennsylvania  
ARM Project 190435

Dear Mr. Moore:

This letter report describes the collection by ARM Group Inc. (ARM) of three (3) 24-hour composite samples of water from Outfall 001 at the Specialty Granules LLC (SGI) Charmian Facility in Blue Ridge Summit, Pennsylvania. ARM understands this work was performed to comply with requests from the Pennsylvania Department of Environmental Protection (PADEP) for asbestos sampling of the effluent from the Charmian Facility.

As specified in the sampling protocol submitted to and approved by PADEP, the three 24-hour composite samples were taken once week apart from the discharge from Lower Mill Pond No. 3 (Outfall 001) at the Charmian Plant. The samples were submitted to RJ Lee Group in Monroeville, PA for analysis of asbestos via EPA Method 100.2

BACKGROUND

SGI operates a non-coal surface mining (quarry) operations near Blue Ridge Summit in metabasalt rock. Currently, all discharges occurring at the Charmian Facility occur through the Lower Mill Pond system to Miney Branch as authorized under NPDES Permit No. PA0009059. The PADEP District Mining Office advised SGI of the desire for sampling for asbestos in the effluent in order to perform a “reasonable potential analysis”. SGI prepared and submitted to PADEP a proposed sampling and analysis plan on April 2, 2019, which PADEP approved by letter dated April 12, 2019.

As explained in Section 6.3 of the U.S. Environmental Protection Agency (“EPA”) NPDES Permit Writers’ Manual, a “reasonable potential analysis” is part of the analysis to be conducted by a permitting agency to determine if a water quality base effluent limitation (“WQBEL”) should be developed and imposed. It is noted that there are no promulgated federal or state instream water quality standards for asbestos. However, pursuant to the Federal Safe Drinking Water Act, EPA has adopted a maximum contaminant level (“MCL”) for asbestos in drinking water of 7 million fibers per liter longer than 10 µm. 40 C.F.R. §141.62(b). Although there is no public drinking water intake within 15 miles downstream of the SGI Lower Mill Pond discharge, the federal drinking water MCL is the only currently available comparator for purposes of analysis.
SAMPLING METHODS

In accordance with the PADEP-approved sampling plan, ARM was engaged to collect three samples from the Lower Mill Pond No. 3 (Outfall 001) at least one week apart for analysis of asbestos via USEPA Method 100.2. The samples were specified to be 24-hour composite samples. Such composite samples are defined in Attachment D of the NPDES Permit Application Instructions as involving at least eight individual samples of at least 100 milliliters each per sampling event. Under the Attachment D “composite” sample guidance, samples are designed to be flow-proportional; if the discharge rate is constant then constant volumes at constant time intervals may be collected.

The sampling was coordinated with the SGI facility during times that the discharge from Outfall 001 was expected to remain constant for the 24 hours during the sampling. For the samples collected on May 20-21 and June 4-5, the flow rates were reasonably consistent through the sampling period. During the sampling period on June 12-13, the flow rates increased over the sample collection period for unforeseen reasons. Although the composite sample taken on June 12-13 was taken at even intervals, and was not under these circumstances flow proportional, the sample result reported by RJ Lee Group (where no asbestos fibers > 10 microns in size were found) would indicate that flow proportionality was irrelevant.

ARM collected three composite samples from Lower Mill Pond No. 3 (Outfall 001) using an ISCO 3700 Composite Sampling unit. This unit was selected due to its durability, ease of handling and operation, and its data collection accuracy. Integral components to the ISCO 3700 allow this unit to be placed remotely and run autonomously without an operator. The unit uses an onboard peristaltic pump to draw in each composite aliquot into an internal 7-liter container. This unit also has seals and covers to prevent atmospheric mixing with the sample train.

Discharge water was sampled at the same location as NPDES samples are taken, an 8” steel pipe connected to the base of the Lower Mill Pond No. 3. Effluent discharge rates average 500 to 1,000-gal/min from this pipe. Since the ISCO 3700 uses vacuum suction via peristalsis, a portion of the sampling stream was diverted into a sampling container by utilizing the existing ½” brass ball-valve sampling port flowing into a sampling container. Schedule 40 PVC and a 5-gallon container were used to divert the flow from the pipe into the container. The discharging pipe was installed to a depth of approximately 2” from the bottom of the container to ensure constant recharge and prevent stagnation in the container. A lid was installed to seal the container from any atmospheric interaction with the water sample. A weir on the side of the container was used to discharge excess water during the 24-hr period. Additional weirs were installed near the bottom of the container to empty it should flow stop during the 24-hr period. If flow stops, the container would empty to a point where no sample could be collected to prevent inaccurate sampling. The sampling unit draws fluids through a combination of polyethylene and vinyl tubing. The tubing was installed near the bottom of the container. A photo log of the sampling setup is included as Attachment A.

The ISCO sampler was programmed to pull a sample of approximately 100 ml every hour for 24 hours (24 samples) totaling approximately 2.4 liters, exceeding the minimum composite sample requirements of 8 - 100 ml samples in a 24 hour period. Final samples volumes were collected after each 24-hour period from the 7 liter internal container by mixing the water thoroughly and then pouring directly into the laboratory-supplied 1 liter polyethylene sample bottles. The collection container was then emptied and rinsed with deionized water.

Event 1: May 20-21, 2019

ARM arrived onsite on May 20, 2019 for the first event. The sampler was rinsed with deionized water and discharge water prior to use. The auto-sampler was started at 10:57AM and left onsite 24 hours. On May
21, 2019 at approximately 9:57 AM, the ISCO 3700 successfully collected the 24-hr composite sample for outfall 001. Samples were placed in laboratory approved 1-Liter plastic bottles and shipped via FedEx to RJ Lee Group under their approved chain-of-custody. The samples were shipped to RJ Lee Group laboratories for analysis. A copy of the chain of custody for this event is included as Attachment B.

**Event 2: June 4-5, 2019**

ARM conducted the second sampling event on June 4, 2019. The equipment setup and sampling methods were identical to the initial event. All equipment in contact with the sample train was rinsed with deionized water then discharge water from the 8” pipe. The ISCO 3700 unit was programmed to collect 100 mL every hour for 24 hours starting at 10:01 AM. On June 5, 2019 at approximately 9:01 AM, the ISCO 3700 successfully collected the 24-hr composite sample for outfall 001. Samples were placed in laboratory approved 1-Liter plastic bottles and shipped via FedEx to RJ Lee Group under their approved chain-of-custody. The samples were shipped to RJ Lee Group laboratories for analysis. A copy of the chain of custody for this event is included as Attachment B.

**Event 3: June 12-13, 2019**

ARM conducted the final sampling event on June 12, 2019. The equipment setup and sampling methods were identical to the initial event. All equipment in contact with the sample train was rinsed with deionized water then discharge water from the 8” pipe. The ISCO 3700 unit was programmed to collect 100 mL every hour for 24 hours starting at 11:47 AM. On June 13, 2019 at approximately 10:47 AM, the ISCO 3700 successfully collected the 24-hr composite sample for outfall 001. Samples were placed in laboratory approved 1-Liter plastic bottles and shipped via FedEx to RJ Lee Group under their approved chain-of-custody. The samples were shipped to RJ Lee Group laboratories for analysis. A copy of the chain of custody for this event is included as Attachment B.

Please contact us if you have any questions regarding this summary report.

Respectfully submitted,
ARM Group Inc.

Jeremy Fleming
Project Geologist II

David W. Mooney, P.G
Senior Project Manager

Enclosures:  
A. Photolog  
B. Chain of Custody Forms
Attachment A

Photograph Log
SGI – Charmian Quarry: 001 NPDES Permit Sampling

**Photo 1 – 5/13/19**

001 Outfall Location

**Photo 2 – 5/13/19**

Sample point connection valve.

June 20, 2019
**Photo 3 – 5/13/19**

Sampling connections and stilling bucket for ISCO 3700 sampler.

**Photo 4 – 5/13/19**

ISCO 3700 Composite sampler.
Photo 5 – 6/12/19
View of sampling system before departure.

Photo 6 – 6/13/19
Completed 24-hour composite sample.
Attachment B

Laboratory Chain of Custody Forms
# Request for Laboratory Analytical Services - Chain of Custody

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**Did you complete a Submit a Sample Form Online?** Yes [ ] No [X]  

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<tr>
<td>Phone:</td>
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<tr>
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<td>Email: <a href="mailto:dmooney@armgroup.net">dmooney@armgroup.net</a></td>
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If a hard copy of invoice is needed, check here: [ ]

**Quality System Requirements (if applicable):**  
Accreditation required to be followed: yes [ ] no [ ]  
Circle which ones to follow:  
- ISO (Please specify):  
- cGMP:  
- Other (Please specify):  

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**Analysis Requested**  
EPA 100.2  
Asbestos in water analysis

**Special Instructions or Comments**  
S&I - Charnian Quarry

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  - Time: 13:15  
- Relinquished By (Print Name):  
  - Van Orden  
- Company Name: ARM Group Inc  
- Method of Shipment: FedEx  

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  - Time:  
- Received By (Print Name):  
  -  
- Company Name:  
- Method of Shipment:  

- Relinquished By (Signature):  
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  - Time:  
- Relinquished By (Print Name):  
  - Company Name:  
- Method of Shipment:  

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**Pennsylvania - HQ**  
350 Hochberg Road  
Monroeville, PA 15146  
724.325.1776 Phone  
724.733.1799 Fax

**Washington**  
Columbia Basin Analytical Laboratories  
2710 North 20th Avenue  
Pasco, WA 99301  
509.545.4989 Phone  
509.544.6010 Fax

**RJ Lee Group**  
DELIVERING SCIENTIFIC RESOLUTION
### Request for Laboratory Analytical Services - Chain of Custody

**ATTENTION TO:** Drew Van Orden  
**Did you complete a Submit a Sample Form Online?** No  
**Client No.:**  
**Purchase Order Number:**  
**Client Job Number:**  
**Invoice To:**  
**Name:** Dave Mooney  
**Company:** ARM Group Inc  
**Address:** 1129 West Governor Road  
**City, State, Zip:** Hershey, Pa 17033  
**Phone:** 717-533-8600  
**Fax:** 717-533-8605  
**Email results to:** dmooney@arrgroup.net  
**Date Results Needed**  
**Standard TA assumed if left blank; please do not use vague terms like ASAP**  
**Rush Charges Authorized?** Yes  
**Analysis Requested**  
**EPA 100.2** Collected @ 0930  
**Special Instructions or Comments**

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Request for Laboratory Analytical Services - Chain of Custody

**ATTENTION TO:** Drew Van Orden

**Did you complete a Submit a Sample Form Online?**
- Yes [ ]
- No [x]

**Lab Use Only**
- Project No.:
- Client No.:
- Date Logged In: Logged In By:

**Report Results To**
- Name: Dave Mooney
- Company: ARM Group Inc
- Address: 1129 West Governor Road
- City, State, Zip: Hershey, Pa 17033
- Phone: 717-533-8600
- Fax: 717-533-8605
- Email results to: dmooney@armgroup.net

**If a hard copy of invoice is needed, check here** [ ]

**Quality System Requirements (if applicable)**
- Accreditations required to be followed: yes [ ]
- no [x]

**Circle which ones to follow:**
- ISO (Please specify):
- cGMP:
- Other (Please specify):

**Client Sample ID**
- 003

**Sample Description**
- Composite Water Sample

**Sample Location (Please specify if not state):**
- PA

**Sample Date**
- 6/13/2019

**Analysis Requested**
- EPA 100.2

**Special Instructions or Comments**

**Chain of Custody**
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- Relinquished To:
- Method of Shipment:

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**Chain of Custody**
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- Received By (Print Name):
- Received From:
- Method of Shipment:

**Date:** 06/14/19
**Time:** 12:00

Pennsylvania - HQ
350 Hochberg Road
Monroeville, PA 15146
724.325.1776 Phone
724.733.1799 Fax

Washington
Columbia Basin Analytical Laboratories
2710 North 20th Avenue
Pasco, WA 99301
509.545.4989 Phone
509.544.6010 Fax

**RJ Lee Group**
DELIVERING SCIENTIFIC RESOLUTION
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</tr>
<tr>
<td>Company</td>
<td>AMD GROUP INC</td>
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*Our liability is limited to USD200 unless you declare a higher value. See the current FedEx Service Guide.*
# Final Laboratory Report
## TEM EPA Water Analysis

Mr. R. Timothy Weston  
K & L Gates  
17 North Second Street  
18th Floor  
Harrisburg, PA 17101  
US

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Authorized Signature:

Ashleigh Sload, Analyst

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**NOTES**

1. Water samples collected more than 24 hours before receipt may be out of compliance. Drinking water samples are filtered within 24 hours of receipt.
2. "<" indicates results less than analytical sensitivity. "---" indicates that sample was not analyzed.
3. Sample(s) for this project were analyzed at: Monroeville, PA (AIHA #100364, NVLAP #101208-0, NY ELAP #10884) facility.
4. If RJ Lee Group, Inc. did not collect the samples analyzed, the verifiability of the laboratory's results are limited to the reported values.
5. Abbreviations: N/A-Not Applicable, Chry-Chrysotile Asbestos, Amph-Amphibole Asbestos, MFL-million fibers per liter.
6. Samples will be held for 30 days and then disposed of per Federal regulations.
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---

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### TEM Count Sheet

**RJ Lee Group, Inc.**

**Date Analyzed:** 5/28/2019

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**7% Particulate**

Abbreviations: F - Fiber, C - Cluster, B - Bundle, M - Matrix, Cle - Cleavage, Asb - Asbestiform, Bys - Byssolite


*Final Review: 5/30/19 8:15 AM  approve by Ashleigh Sload*
Final Laboratory Report
TEM EPA Water Analysis

Mr. R. Timothy Weston
K & L Gates
17 North Second Street
18th Floor
Harrisburg, PA 17101
US

Report Date: 06/17/2019
Sample Receipt Date: 06/06/2019
RJ Lee Group Job No.: LLH808740-3
Authorized/P.O. No.: 
Samples Received: 1
Client Job No.: 

Method: EPA Method 100.2 600/R-94-134

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Authorized Signature: Monica McGrath-Koerner, Scientist

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### Field Count Sheet

**RJ Lee Group, Inc.**  
TEM Count Sheet  
Date Analyzed: 6/14/2019

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12% Particulate

Abbreviations: F - Fiber, C - Cluster, B - Bundle, M - Matrix, Cle - Cleavage, Asb - Asbestiform, Bys - Byssolite

Initial Review: 6/14/2019 9:36:21 AM approve by Jon Swope  
Final Review: 6/17/19 10:55 AM approve by Monica Mcgrath
Final Laboratory Report  
TEM EPA Water Analysis

Mr. R. Timothy Weston  
K & L Gates  
17 North Second Street  
18th Floor  
Harrisburg, PA 17101  
US

Report Date: 06/19/2019  
Sample Receipt Date: 06/14/2019  
RJ Lee Group Job No.: LLH808740-4  
Authorization/P.O. No.:  
Samples Received: 1  
Client Job No.:  

Method: EPA Method 100.2 600/R-94-134

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Authorized Signature: 
Monica McGrath-Koerner, Scientist

NOTES
1. Water samples collected more than 24 hours before receipt may be out of compliance. Drinking water samples are filtered within 24 hours of receipt.
2. "<" indicates results less than analytical sensitivity, "---" indicates that sample was not analyzed.
3. Sample(s) for this project were analyzed at our: Monroeville, PA (AIHA #100364, NVLAP #101208-0, NY ELAP #10884) facility.
4. If RJ Lee Group, Inc. did not collect the samples analyzed, the verifiability of the laboratory's results are limited to the reported values.
5. Abbreviations: N/A-Not Applicable, Chry-Chrysotile Asbestos, Amph-Amphibole Asbestos, MFL-million fibers per liter.
6. Samples will be held for 30 days and then disposed of per Federal regulations.
7. These results are submitted pursuant to RJ Lee Group's current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which these results are used or interpreted.

DISCLAIMER
RJ Lee Group, Inc. is accredited by the New York Department of Health Environmental Laboratory Program (NY ELAP) and the Pennsylvania Department of Environmental Protection (PA DEP) for asbestos in water analysis by TEM. This report may not be used to claim product endorsement by NY ELAP, PA DEP or any other regulatory or laboratory accrediting agency. Any reproduction of this document must be in full in order for the report to be valid. This report is not valid unless it bears the name of a NY ELAP and PA-DEP approved signatory.

These results are submitted pursuant to RJ Lee Group's current terms and conditions of sale, including the company's standard warranty and limiting provisions and no responsibility or liability is assumed for the manner in which the results are used or interpreted. Unless notified in writing to return the samples covered by this report, RJ Lee Group will store the samples for a period of thirty (30) days before discarding. A shipping and handling fee will be assessed for the return of any sample.
### TEM Count Sheet

**RJL: LLH808740-4**

**Vol: 25. mL**

**Filter Size: 47 mm**

**3159023.HTW2**

**Microscope tem2000fx1**

**K & L Gates**

**Grid: 0.0095 mm²**

**Magnification 21 KX**

**HQ44356**

**Acc. Voltage 120 KV**

**Operator: Ashleigh Sload**

**Cv = 0**

**Date Analyzed: 6/18/2019**

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14% Particulate

Abbreviations: F - Fiber, C - Cluster, B - Bundle, M - Matrix, Cle - Cleavage, Asb - Asbestiform, Bys - Byssolite

Final Review: 6/18/19 4:39 PM approve by Monica Mcgrath