

Comment #	Comment	Commenter #	Category	SGI Response
3	SGI has failed to concurrently reclaim land "disturbed" by its vast surface mining operations as required by 25 Pa. Code § 77.595. According to SGI, the Western Ridge pit ceased to be quarried in 1996. That is over two decades ago! While SGI is fully able to scrape and destroy in order to fulfill customers' orders, it provides no explanation whatsoever regarding its failure to reclaim the Western Ridge pit. Two decades have lapsed: that hardly can be considered "concurrent" reclaiming. This is an example of SGI flouting the existence of applicable law, and this flouting of law is a "violation" under the above-referenced statute, 25 Pa. Code § 77.126(a)(6).	32	Overall Permitting Issues	SGI has implemented and is continuing to implement the DEP-approved reclamation plan for the West Ridge Quarry in accordance with its terms. The approved reclamation plan for the West Ridge Quarry Pit provides for reclamation in the following manner: fine crushed rock will be backfilled until it has filled to the quarry rim. After that point, the material will be placed in small lifts and compacted and shaped into a pile or mound. The final overall slope of the fill will have an overall grade of 3:1. Upon reaching final configuration in each portion of the pile/mound area, the outer slopes are reclaimed with soil and seeded to prevent erosion. Once placement of the material in the pile/mounded area is completed, the approved reclamation plan consists of planting grasses and completing reforestation activities. Backfilling of the West Ridge Quarry is proceeding and is an active operational area, with placement of fines generated from operations of the adjacent Pitts Quarry. The backfilling will continue in accordance with the DEP-approved plan for several more years. For additional information, see §13.2 of SGI's November 12, 2018 Responses to Public Comments ("SGI First Responses") and §15.2 of SGI's July 3, 2019 Responses to Public Comments ("SGI Second Responses").
25	With regards to all existing permits for SGI's operation at the current location in Hamiltonban Township Adams County PA: are there any "grandfathered permits," licenses, or out of date licenses/permits that were reissued and/or have precedence over existing regulations? In other words, do any of SGI's current operations and/or proposed operations allow them to conduct operations outside of existing regulations?	41	Overall Permitting Issues	SGI's operations at the Charmian facility are all subject to existing regulations and are not subject to "grandfathered permits." SGI's NPDES permits are subject to renewal every five years, and during the course of renewal reviews, DEP considers whether, based on updated information, the facility is in compliance with current applicable water quality standards, effluent limitations or other legally applicable requirements. See 25 Pa. Code §92a.75(b). Similarly the Air Quality Operating Permit for the Charmian facility is subject to renewal every five years, with renewals based upon compliance with current standards. See 25 Pa. Code §127.401 et seq. SGI's active mining operations are required to comply with DEP's current noncoal surface mining regulations contained in 25 Pa. Code Ch. 77. Reclamation plans for each quarry are established as part of the permit issued at the time each respective quarry is authorized.
43	How many fewer years would SGI get if it did not mine the northernmost and northwesternmost slopes? Why is this not a reasonable trade-off to make?(See Clifford Frost 2/11/2019 PDF for Photograph)	14	Overall Permitting Issues	This comment starts from the false premise that SGI's proposed Northern Tract mining operations would require "tradeoffs" between economic and environmental costs and benefits. For the reasons explained in much greater detail throughout SGI's application materials and First and Second Responses (see in particular the Application's Anti-Degradation Supplement in Module 24), SGI intends to develop the Northern Tract Quarry (including the northernmost and northwestern most slopes) in a manner that complies with all applicable environmental regulations and avoids negative environmental impacts.
65	The existence of asbestos at Charmian was documented in 1942 and was mined.	9	Geology	SGI has no knowledge of the alleged documented occurrence or mining of asbestos in the 1940's mentioned in this comment, nor did the commenter provide any documentation in support of the statement. Based upon our knowledge of the geology of our site we find it highly improbable that an asbestos mine was located at the facility. As described in the SGI application materials and supporting materials, the occurrence of a mineral named actinolite in the metabasalt formation that is mined at the Charmian facility is rare but possible. This mineral occurs in small discretely located quantities. Actinolite rock can come in multiple forms, at the mine the most common form is crystalline without friable fibers and therefore non-asbestiform. However, the potential for encountering actinolite asbestiform materials is possible and is why SGI undertakes substantial measures to avoid and contain any suspect minerals through implementation of its Suspect Minerals Identification and Management Protocol. See generally SGI First Responses §7 and Appendices 7.1 and 7.2; SGI Second Responses §9; and and SGI's Response to PaDEP's September 20, 2019 Technical Deficiency Letter (which is being submitted concurrently with these responses).
66	SGI claims they have to mine the Pine Hill location because of the metabasalt existing in that location.	55	Geology	As described in the Social or Economic Justification ("SEJ") Supplement filed with SGI's application, and associated supporting materials, SGI is engaged in the production of roofing granules that require a source of highly durable metabasalt material. Such metabasalt materials are relatively rare in occurrence, and an ongoing source of metabasalt material is required as the resources of the existing Pitts Quarry are exhausted. The metabasalt formation that we are mining at this location continues onto the Northern Tract, and its location adjacent to the existing mining operations provides a logical extension for utilization of the same metabasalt sources. For additional details, see the Application's SEJ Supplement, the SGI Second Responses §§ 3.6(d), 3.11 and Appendix 3.4.
68	Asbestos was mined in the 1940's right where the original "Grit Mill" existed.	55	Geology	See response to comment 65 above.
73	SGI claims that Actinolite is "rare" in the Catoctin formation it mines. However, SGI has provided no definition of what it means by "rare," or quantification of why this is relevant to public health and worker safety concerns. My understanding is that Actinolite "blooms" and large "veins" can be identified reasonably easily, but that there are also small deposits throughout the rock.	14	Geology	See response to comment 65 above. The commenter's characterization of blooms and large veins of actinolite in the area are incorrect; in fact, the rare occurrence of actinolite in the metabasalt formations on the Charmian property appear in small, isolated deposits that are visible to the naked eye. Sampling taken from rock cores drilled in the Northern Tract area found only 3 of 40 samples that contained any actinolite, and those samples contained only very small (0.2 to 0.5% of the sample) quantities of actinolite. The relative rarity of actinolite is relevant from several perspectives. Such rarity means that there is a low probability to encountering actinolite, and moreover most of that actinolite is crystalline, not asbestiform. Even though actinolite is rare, SGI has adopted and implemented the Suspect Minerals Identification and Management Protocol (Appendix 7.1 to SGI First Responses) to provide for identification, segregation and avoidance of materials that might potentially contain actinolite. The results of ambient air quality testing and hundreds of industrial hygiene tests submitted to DEP show no threat to public or worker health. For additional information, see SGI First Responses §7 and Appendices 7.1, 7.2, 7.3; and SGI's Response to PaDEP's September 20, 2019 Technical Deficiency Letter (which is being submitted concurrently with these responses).
117	Following the 2011 green sludge spill event, SGI sampled our water for contamination. We requested analysis for all heavy metals and poisons, however only iron and lead were analyzed for. No chemicals were ever analyzed for.	29	Surface Water Quality	The release in May 2011 was of erosion from rain runoff containing dirt and rock fines. The rock and rock fines have been tested extensively and are not toxic or poisonous and they do not leach anything dangerous; they are simply particles of clean rock. The parameters of concern for a rock fine release are suspended solids and discoloration. In addition, SGI performs effluent characterization sampling from its permitted outfalls for a range of metals and other toxic pollutants in conjunction with regular NPDES permit renewals.
147	There have been outflows to Miney Branch, to such an extent that SGI has sent documented recovery teams to mitigate the damage downstream	8	Surface Water Quality	SGI has never sent "recovery teams" to mitigate damage to Miney Branch. SGI has investigated complaints regarding alleged impacts to Miney Branch, but those investigations have never warranted remedial actions in Miney Branch. As noted in SGI First Responses §11.1, in response to May 2011 release event, SGI responded with a crew of personnel who used shovels and buckets to collect fine material on the hillside adjacent to the West Ridge quarry area (not in Miney Branch), and subsequent corrective engineering actions were taken to avoid similar incidents in the future. See SGI First Responses §11.1 for additional detail.
149	If the retention facility at the outfall to Miney Branch is such a wonderful retaining facility, why is it hidden behind no trespassing fences from the general public?	8	Surface Water Quality	Protective fencing is a standard security and public safety measure that is routinely implemented at many location such as residential, commercial, industrial and mining. Our fencing is see-through at most locations and is not an attempt to hide any operations.
196	This land (Pine Hill) – called the "Northern Tract" by SGI – was never supposed to be mined. It was purchased with Adams County taxpayer money to be conserved to protect water resources and the headwaters of Tom's Creek and Middle Creek in perpetuity. Pine Hill fell into SGI's hands as a result of a land swap that was carried out entirely in secrecy. Once it was disclosed to the public, it was vehemently opposed by the vast majority of residents in the community. Community residents have continued to express their opposition at every juncture. At the end of January 2019, at a hearing with DEP, 18 out of 26 speakers opposed the issuance of permits. With one possible exception, those in favor of the permits had a financial relationship with SGI – as employees, former employees, customers, etc. And very few of those in favor actually live in close proximity to the mine. The people who are directly affected in Adams County and Franklin County have spoken clearly and repeatedly in opposition to the mine expansion.	55, 65, 66, 67, 77, 87	Land Swap	The land exchange between SGI and DCNR was not "secret"; rather, it was conducted with full public notice and a public hearing, comment and response process. The details of that process are described in SGI First Responses §15 and SGI Second Responses §19. The public comment process on SGI's pending applications have likewise been subject to a public notice, hearing and comment process, with speakers providing a variety of perspectives. We disagree with the commenter's characterization of the public commenters. In addition, SGI and PADEP have taken multiple steps in the permitting process to address many concerns voiced by the public so that they should no longer be an issue.

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197	<p>SGI is not trusted because of the devious secret swap of land it participated in to get the NT site. Also promises are not believed since many were made in 2011 but none, such as reclaiming West Ridge, were fulfilled. SGI will give \$8-10K toward a community park, or to Strawberry Hill, but that is "chump change" for a company like SGI and people know it. Your process of forms and certified letters does not allow you to understand how the company actually interacts with local governance. Hamiltonban was worried about the threat that SGI would shut down, but it doesn't see its future tied to SGI.</p> <p>SGI has made no actual investment in any community program: No scholarships, no training programs, no sponsorship of 4-H, no partnership for badly needed community programs such as an opioid consulting clinic, etc. For all the many years of complaints lodged against the company since it moved into the Stanley Pitts property and literally started ruining the quality of life for so many people who had long lived in peace in the wooded hills, SGI has consistently chosen to take complaints on an individual basis, never creating a community outreach office.</p>	55	Land Swap	<p>See response to comment 196 above regarding SGI's acquisition of the Northern Tract property.</p> <p>See response to comment 3 above regarding reclamation of the West Ridge Quarry.</p> <p>In response to the comments concerning SGI's investments in the community, as explained in SGI's Second Responses §3.11, SGI has been actively engaged in cooperative efforts, working with governmental and community organizations, on a range of community and environmental stewardship projects. Those efforts have included substantial contributions to improvements to the Monterey Pass Battlefield Museum, where in 2014, SGI contributed materials toward the reroofing of the museum building. SGI's commitment was more recently evidenced in its cooperative efforts working with the Adams County Conservation District in a project on Strawberry Hill involving revitalization of the Middle Creek trout habitat and the park's erosion control project. The project, which was highlighted in the Adams County Conservation District Annual Report, was designed by the Adams County Conservation District with input from the Pennsylvania Fish & Boat Commission and See response to comment 196 above regarding SGI's acquisition of the Northern Tract property. See response to comment 3 above regarding reclamation of the West Ridge Quarry. In response to the comments concerning SGI's investments in the community, as explained in SGI's Second Responses §3.11, SGI has been actively engaged in cooperative efforts, working with governmental and community organizations, on a range of community and environmental stewardship projects. Those efforts have included substantial contributions to improvements to the Monterey Pass Battlefield Museum, where in 2014, SGI contributed materials toward the reroofing of the museum building. SGI's commitment was more recently evidenced in its cooperative efforts working with the Adams County Conservation District in a project on Strawberry Hill involving revitalization of the Middle Creek trout habitat and the park's erosion control project. The project, which was highlighted in the Adams County Conservation District Annual Report, was designed by the Adams County Conservation District with input from the Pennsylvania Fish & Boat Commission and Adams County Trout Unlimited. As observed by the Conservation District's Manager, Adam McClain: "The Middle Creek Fish Habitat Improvement Project was a great community project in many ways. The project provided great habitat for trout and also stabilized eroding stream banks in one of the highest quality streams in Adams County, PA. ... It was also refreshing to me to see a local business like Specialty Granules recognize the needs that were lacking in the partnership and quickly fill that niche." Additional testimony concerning SGI's community contributions was provided by a number of witnesses at DEP's January 30, 2019 hearing, including: (1) Jeffrey Geesaman, Township Manager, Washington Township (history of contributions to the community and assistance to the Township); (2) Buck Browning, Director of the Ft. Ritchie Community Center (SGI contributions to center operations and youth programs); and (3) Todd Willman, Manufacturers Association of Southcentral Pennsylvania (SGI's payroll, economic contributions to the region, and community organization support). Adams County Trout Unlimited. As observed by the Conservation District's Manager, Adam McClain: "The Middle Creek Fish Habitat Improvement Project was a great community project in many ways. The project provided great habitat for trout and also stabilized eroding stream banks in one of the highest quality streams in Adams County, PA. ... It was also refreshing to me to see a local business like Specialty Granules recognize the needs that were lacking in the partnership and quickly fill that niche." 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198	<p>Usually these industries leave environmental cleanup to the municipality or the state. In the case of a surface mine which is contaminated with actinolite asbestos, the cleanup could easily end up as a Federal responsibility (i.e. Superfund).</p> <p>If the local tax base is too dependent on them it makes the municipality fragile, subject to the kind of blackmail SGI is now using to further its own private interests. Nowhere in the Adams County or the Hamiltonban Comprehensive plans is there any mention of mining as an economic basis. The quote used by SGI about Industrial development is about light industry, and surface mining is specifically noted only under "Conditional Use Zoning". (See Hamiltonban Township Zoning Ordinance.)</p> <p>The Hamiltonban "Conditional Use Permit" provided to SGI (NARRATIVE TO CONDITIONAL USE PERMIT APPLICATION (THE "APPLICATION") UNDER THE HAMILTONBAN TOWNSHIP ZONING ORDINANCE (THE "ORDINANCE")) contains a requirement which SGI has chosen to ignore, but when enforced by the township will make mining the NT difficult, if not impossible: 4.n) "There shall be no vibration which is discernible to the human sense of feeling beyond the immediate site on which such use is conducted." E. The Adams County requirements include preserving Toms Creek. (Appendix E) (See Sherry Rogers-Frost 2/13/2019 PDF for Appendix)</p>	55	Land Swap	<p>In response to the comment concerning industries leaving "environmental cleanup" to municipalities and states, the proposed reclamation plan for the Northern Tract and the previously approved reclamation plans for the West Ridge Quarry and currently operating Pitts Pond Quarry all include detailed reclamation cost estimates which are part of DEP's full-cost bonding program. Specifically, 25 Pa. Code §77.202 provides for the bond posted by an operator to reflect "the estimated cost to the Department if it had to complete the reclamation, restoration and abatement work required under the act" For the Northern Tract Quarry, those cost estimates are provided in Module 10. DEP may require operators to periodically update those cost estimates and adjust the amount of the required reclamation bond, and SGI will of course comply with any such requests. See SGI First Responses §13.1 and SGI Second Responses §15.1. In response to the comment concerning SGI allegedly ignoring a Conditional Use Permit requirement, as discussed in SGI's Second Responses §18, SGI's Conditional Use Approval does not contain conditions relating to blasting. The commenter appears to be referring to a requirement contained in Section 1303 of the Hamiltonban Township Zoning Ordinance, but that section explicitly makes clear that surface mining operations are not subject to those provisions but rather are governed by the prevailing applicable performance standard requirements of DEP.</p>
204	<p>Further, the final product - asphalt shingles - depends directly on asphalt, 100% fossil fuel production. The market share for asphalt shingles is waning as more and more people weigh the high environmental costs associated with asphalt as compared to environmentally friendly metal roofing.</p>	73	Economy	<p>As explained in SGI First Responses §2.6 and SGI Second Responses §3.11, there is a well-established market for the unique roofing granules that are produced at SGI's Charmian facility, and that market is not waning. The durability of asphalt shingles has increased dramatically over the past several decades, with manufacturers now offering 40-year or lifetime warranties, when previously 25-30 year warranties were the norm. With that durability increase, asphalt shingles utilizing durable granules such as those produced by SGI are and remain the primary roofing product in North America. Of the U.S. sloped roof market, asphalt shingles and associated "component" roofing systems represent over 75% of annual installations, compared to only 14% for metal. There is no evidence of a decreasing demand for asphalt roofs. The typical installed cost of asphalt shingle roofs is about one-half that of a comparable metal roof (\$10,000 vs. \$19,000). With low initial and life cycle costs and reasonable installation fees, shingles are by far the most popular and cost-effective roofing solution, and are an essential component of maintaining affordability in housing. Most solar roof installations are designed for asphalt roofs. In addition, asphalt is a byproduct of the refining process for gasoline production and would have to be disposed of as a waste if not put to a commercial use. The use of asphalt is therefore waste minimization and environmental friendly.</p>
206	<p>There is also the uncertainty of profit in the asphalt shingle roofing business. Metal roofs are gaining market share quickly, due to architectural acceptance, the ability to shape metal in many new ways, and the increased occurrence of "major storm events." Insurance companies give discounts for metal roofs because of their strength and longevity.</p> <p>Solar roofs are just beginning to make an impact on the market, but once the manufacturing infrastructure is in place there is a tremendous demand which has developed and will continue to grow.</p>	55	Economy	<p>See response to comment 204 above.</p>
212	<p>The post-mining impoundment will be on SGI's posted property, how can it serve a "recreation" use?</p>	73	Economy	<p>SGI intends for the post-mining impoundment to be available to the municipality if they wish it to be opened for public use pursuant to an agreement with the Township.</p>
215	<p>Did the company address the long-term projections for the market for the type of stone they sell for shingles?</p>	61	Economy	<p>See response to comment 204 above.</p>
216	<p>Is there sufficient evidence that the market for that type of shingles will continue to be there once the company is permitted to expand?</p>	61	Economy	<p>See response to comment 204 above.</p>

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236	WHO BENEFITS: MEGA CEOS! SGI, or predecessor limited liability companies, point to over nine decades of operations, and yet NO WEALTH has been created in our community. Wealth flows up the executive chain and out of Pennsylvania. Please analyze the SGI payroll and consider whether nonresident, executive pay has any positive impact on our community.	73	Economy	SGI engaged an expert economic consulting firm, Econsult Solutions, Inc. ("ESI"), to prepare an update to the economic impacts analysis for the Charmian facility. The results of that analysis are presented in the SGI Second Responses, Appendix 3.4. In short, the ESI analyses concluded: (1) Based on SGI's 2018 operations (not including capital investments), SGI generated \$40.2 million in total economic impacts within Adams County and supported 264 jobs (both direct and indirect) and \$19.2 million in wages and salaries. (2) Within the Commonwealth, SGI generated \$60.9 million in total economic impacts and supported 476 jobs (both direct and indirect), \$35 million in wages and salaries, and \$1.2 million in annual tax payments to the state. (3) In 2018, SGI's capital investments generated \$6.9 million in total economic activity in Adams County and supported 37 total jobs and \$1.7 million in wages and salaries. (4) Within the Commonwealth, SGI's capital investments generated \$10.5 million in total economic activity and supported 58 total jobs, \$2.6 million in wages and salaries, and \$130,000 in tax revenue. (5) SGI significantly contributes to local governmental tax revenues. SGI's Charmian plant directly pays local property taxes, its employees pay local earned income tax, and the economic activity generated by its existence leads to additional local tax revenues. In 2018, SGI's Charmian plant paid over \$254,000 in county, township and school district property taxes; and SGI plant employees paid an estimated \$157,500 in earned income taxes to area school districts. For further information, see SGI Second Responses §3.11.
352	The D.L. George truck depot along Highway 16 has been a recurring and irritating source of noise and light to the neighborhood. SGI should agree to use its influence as contractor to have D.L. George reduce this noise and light pollution.	27, 28	Trucks	This comment concerns alleged light and noise pollution generated by an entity that has no corporate affiliation with SGI, at a location that is several miles from the Charmian facility. While SGI appreciates the spirit of the comment in that it agrees that noise and light impacts should generally be avoided, the specific allegations have no bearing on SGI's Northern Tract applications.
370	How will trucks be monitored for emissions compliance on a daily basis? Has the existing quarry been required to do same? Who monitors and waters down or cleans streets affected by heavy traffic?	41	Trucks	In response to the comment suggesting that trucks be monitored for emissions compliance on a daily basis, daily motor vehicle emissions monitoring is neither feasible nor required under state or federal air pollution laws. Rather, motor vehicle emissions are carefully regulated under a national system of rules developed and enforced by the U.S. Environmental Protection Agency under the federal Clean Air Act. In response to the comment concerning air emissions from the existing quarry, please see SGI First Responses §8, which describes in detail SGI's compliance with applicable air emissions requirements. In reference to the comment concerning watering and cleaning of streets, SGI First Responses §5.3 explains that control of local roadways is under the purview of Hamiltonban Township. SGI has worked with the Township to adopt the two mile section of road between the quarry and Route 16 that carries SGI related truck traffic. Furthermore, SGI recently purchased a street sweeper and utilizes it to clean roads near the site entrances as needed. SGI's street sweeper is a state-of-the-art sweeper utilizing a broom system and water sprays to collect debris while minimizing dust generation. (That unit is certified for PM-10 emissions control under the stringent standards of Southern California Air Quality Management District Rule 1186.) SGI will continue to work in partnership with the Township to help maintain the portion of road utilized by SGI-related trucks. SGI dedicates a crew once a month to pick up trash on the roads on around the perimeter of the property. Finally, SGI is building a new access road to Route 16 which will redirect approximately 75% of the truck traffic away from local streets.
371	Why are there no signs leading to and from the quarry advising the community of the truck traffic?	41	Trucks	The issue referred to in this comment should be substantially alleviated by the installation of the Route 16 connector described in SGI First Responses §5.2 and SGI Second Responses §7.1. Construction of the Route 16 connector project is currently underway. As indicated in SGI First Responses §5.3, SGI has hired a traffic consultant to review traffic patterns and controls near the site entrances where SGI-related truck traffic regularly travels. At the conclusion of this study SGI will make recommendations to the Township for improvements and the placement of additional signs or signals where needed. SGI will offer to fully pay for installation of this signage.