

EAST ROCKHILL TOWNSHIP BOARD OF SUPERVISORS

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September 11, 2019

Michael Kutney, P.G. (via email)
Chief, Permits & Technical Section
Department of Environmental Protection
Pottsville District Mining Office
5 West Laurel Boulevard
Pottsville, PA 17901

Subject: Rockhill Quarry (Pierson Materials/Hanson Aggregates)
East Rockhill Township Comments on Qualitative Geologic Survey
East Rockhill Township
File No. 11-225

Dear Mr. Kutney:

East Rockhill Township is in receipt of the results of 41 samples taken by Hanson Aggregates Pennsylvania, LLC, through its contractor, at the Rock Hill Quarry located in East Rockhill Township, Bucks County (the "Site"), which were reported on June 27, 2018 and June 28, 2019, as well as the results of 10 of the 41 split-samples taken by the Pennsylvania Department of Environmental Protection (the "Department"), which were reported on August 21, 2019.

It appears that Hanson had its 41 samples analyzed using polarized light microscopy ("PLM"). In a report prepared by Dr. Bradley G. Erskine, Ph.D., PG, CEG, CHG, CAC, dated June 6, 2019, Dr. Erskine explained in convincing detail why PLM would on average result in underreporting asbestos concentrations. Dr. Erskine recommended that Hanson also use transmission electron microscopy ("TEM"), which can detect fine asbestos particles that commonly cannot be detected using PLM. In a second report prepared by Dr. Erskine, dated September 1, 2019, Dr. Erskine documented his review of Hanson's 41 sample results and uncovered additional flaws in the laboratory's application of the PLM methodology and the results that were reported.

After Hanson reported its 41 sample results to the Department, the Department had 10 of its 41 split-samples analyzed using both PLM and TEM. Based on a comparison of Hanson's and the Department's sample results, it is plainly apparent that Hanson's and the Department's results differ dramatically. As Dr. Erskine predicted, the Department's reported asbestos concentrations using TEM on average were significantly higher than the Department's and Hanson's reported asbestos concentrations using PLM. To put the Department's sample results into perspective, the sample that led the Department to order the cessation of all mining and crushing activities at the Site contained a reported asbestos concentration of 0.25%. According to the Department's sample results, when analyzed using TEM, 6 of the 10 samples contained a higher concentration than 0.25%, and one of the samples contained a concentration of **19.1%**, which is **7500% greater** than the reported concentration of the sample that led the Department to cease all mining and crushing activities at the Site for the past nine months.

The Township has the following requests based on the sample results discussed above:

- The Township requests that the Department require Hanson to have all of its 41 sample results analyzed using both PLM and TEM, as explained by Dr. Erskine in his reports dated June 6, 2019 and September 1, 2019.
- The Township requests that the Department produce a figure that depicts all of the 41 sample locations as well as an explanation of how each sample was taken. For example, one of the samples is labeled "Vein 7," but neither the Department nor Hanson has explained where and how this sample was taken.

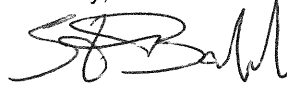
Michael Kutney, P.G. (via email)
Subject: Rockhill Quarry (Pierson Materials/Hanson Aggregates)
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- The Township reiterates its earlier comments, submitted to the Department on April 17, 2019 and April 30, 2019, that the Qualitative Geologic Survey Sampling Plan ("QGSSP"), prepared on behalf of Hanson, and approved by the Department, which resulted in the 41 samples discussed above, is inadequate to delineate the presence of asbestos at the Site and to ensure that mining activities at the Site will be protective of human health and the environment.

Thank you for your consideration of the foregoing comments.

If you have any questions, do not hesitate to contact me.

Sincerely,



Steven Baluh, P.E.
Township Engineer
C. Robert Wynn Associates, Inc.
(215) 536-7336 – Office

SB/mew

cc: Marianne Morano, Township Manager (via email)
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