



Sent via e-mail only

Hanson Aggregates Pennsylvania LLC
7660 Imperial Way
Allentown, PA 18195-1040
Tel 610-366-4600
Fax 610-871-5994

September 9, 2021

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

**Re: Preliminary Ambient Air Analysis Results
Elevated Review Technical Deficiencies Application No. 7974SM1C10
Hanson Aggregates Pennsylvania LLC
Rock Hill Quarry
East Rockhill Township, Bucks County, PA**

Dear Mr. Tallman:

As the Department is aware, Hanson has performed perimeter ambient air sampling at the Rock Hill Quarry on three (3) occasions following Hanson's July 6, 2021 Response to the Department's April 12, 2021 Technical Deficiency letter. Hanson will conduct one (1) additional round of sampling planned for Friday, September 10th, weather permitting. In total, to date Hanson has collected ambient air samples at the perimeter of the quarry on the following occasions:

1. June 23, 2021 (analysis include with July 6, 2021 Response);
2. July 6, 2021;
3. July 28, 2021;
4. August 27, 2021 (analysis to be submitted at later date)

RJ Lee Group, Inc. (RJ Lee) has analyzed the July 6, 2021 and July 28, 2021 air samples and presented results in the following attached documents:

1. Hanson Cover letter (7.30.2021) and TEM ISO Analysis Report (Report Date 7.8.2021);
2. TEM ISO Analysis Report (Report Date 8.11.2021).

Over three (3) rounds of sampling for which laboratory analysis has been completed, RJ Lee has counted all structures ≥ 0.5 μm with a $\geq 3:1$ aspect ratio. A single amphibole structure (5.5 μm long, 0.7 μm wide) has been identified, which did not possess characteristics of asbestiform morphology. The concentration calculated from that analysis was 0.001 fibers/cc – 10 times lower than Hanson's action limit of 0.01 fibers/cc. For more information, please see the included RJ's Lee July 30, 2021 analysis.

Hanson anticipates the 5th air sampling event on September 9, 2021 will be the final background event prior to submission of the remaining Technical Deficiency Letter document response on or before October 29, 2021. Hanson remains committed to working with the Department to allow the removal of the Cessation Order so that quarrying activities can resume at the Rock Hill Quarry

Regards,



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

encl: as stated

cc: John Stefanko, PADEP (e-mail only)
Daniel Sammarco, P.E., PADEP (e-mail only)
Gary Latsha, PADEP (e-mail only)
Michael P. Kutney, P.G., PADEP (e-mail only)
Randy Shustack, PADEP (e-mail only)
Amiee Bollinger, PADEP (e-mail only)
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Jillian Gallagher, PADEP (e-mail only)
Ashley Davis, PADEP (e-mail only)
Robert Fogel, PADEP (e-mail only)
Neil Shader, PADEP (e-mail only)
Virginia Cain, PADEP (e-mail only)
Craig Lambeth, Esq., PADEP (e-mail only)
Marianne Morano, East Rockhill Township (e-mail only)
County of Bucks (e-mail only)
Rockhill Environmental Preservation Alliance (e-mail only)
Julie Goodman, PhD, Gradient Corp. (e-mail only)
Kelly Bailey, CIH, KBC LLC (e-mail only)
Bryan Bandli, PhD, RJ Lee Group (e-mail only)
Matthew Weikel, P.G., EARTHRES (e-mail only)
Joe Kim, P.E., EARTHRES (e-mail only)
Kristian Witt, CMI (e-mail only)
Mark E. Kendrick, Hanson (e-mail only)
Michael C. Lewis, CHMM, Hanson (e-mail only)
Timothy J. Poppenberg, Hanson (e-mail only)
Robert, J. Schena, Esq., Fox Rothschild LLP (e-mail only)
Environmental File

PRIVILRGED AND CONFIDENTIAL

July 30, 2021

Robert Schena
Fox Rothschild LLP
2700 Kelly Road, Suite 300
Warrington, PA 18976

RE: Air Sample Analyses
RJ Lee Group Project Number: LLH901997

Mr. Schena,

RJ Lee Group (RJLG) has analyzed eight (8) samples and two (2) blank filter cassettes collected by Compliance Management International on July 6, 2021. The samples were received in good condition via FedEx on July 8, 2021. The samples were analyzed using ISO method 10312 modified per OSWER Directive #9200.0-68 to include fibers $\geq 0.5 \mu\text{m}$ long and $\geq 3:1$ aspect ratio.

Figure 1 shows the location of the sampling sites on an a map of the Rock Hill quarry site as well as the wind direction (as recorded by Compliance Management International) during the sampling event.

Of the eight samples analyzed, no countable structures ($\geq 0.5 \mu\text{m}$ long, $\geq 3:1$ aspect ratio) were detected in seven of the samples. A single amphibole structure (Figure 2) was observed during the analysis of sample 0706-4 (3174478) collected at site location M5. The structure is $5.5 \mu\text{m}$ long and $0.7 \mu\text{m}$ wide (aspect ratio 7.86) and does not have characteristics of asbestiform morphology. The concentration calculated from this analysis is 0.001 fibers/cc and is 10 times lower than the proposed action limit of 0.01 fibers/cc.

No countable structures were observed on either of the analyzed field blanks.

The laboratory analysis report provided to you on July 21, 2021 is attached for reference.

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

Sincerely,



Bryan Bandli, Ph.D.
Principal Investigator
bbandli@rjleegroup.com

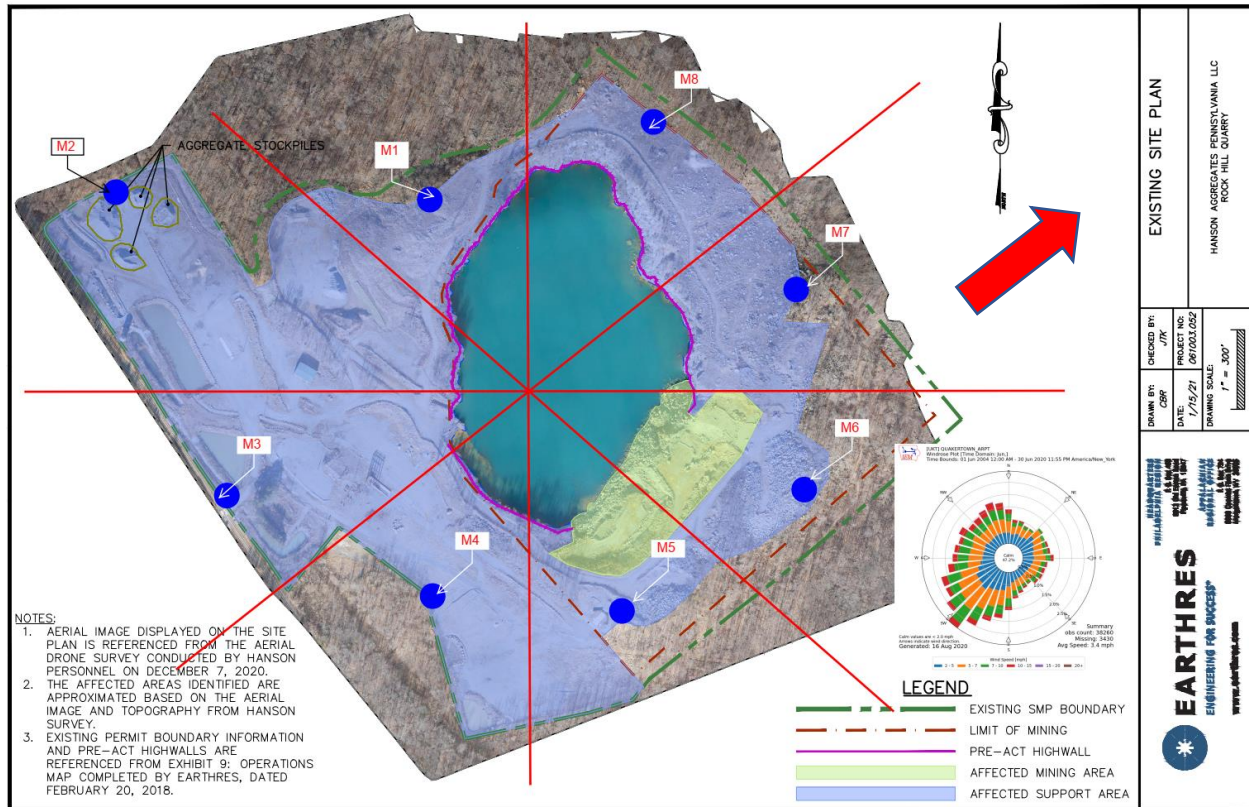


Figure 1. Rock Hill quarry site map with sample collection locations indicated with blue dots. Prevailing wind direction during July 6, 2021 sampling indicated by red arrow at upper right of map. Average wind speed 2.8 mph during sampling.

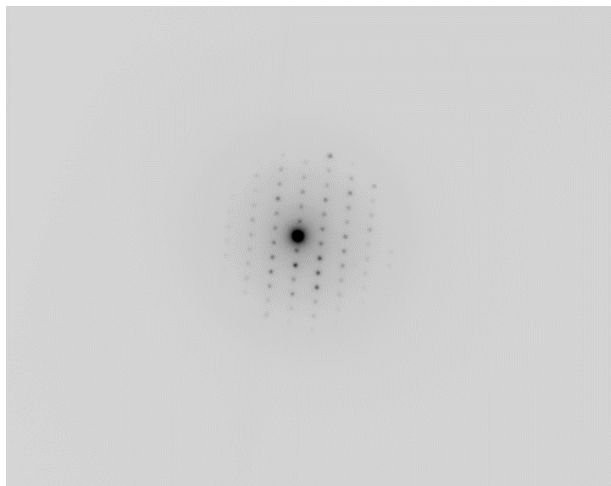
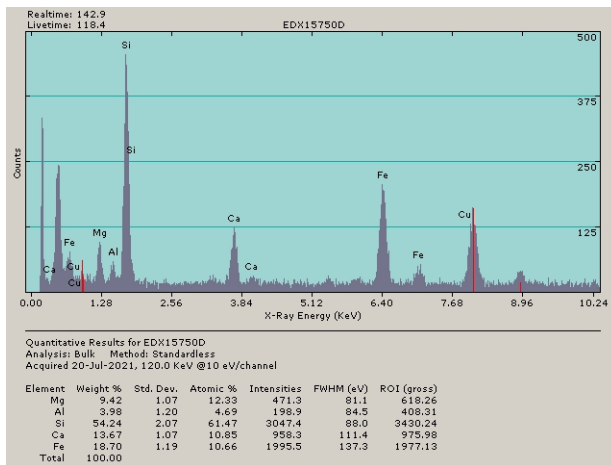
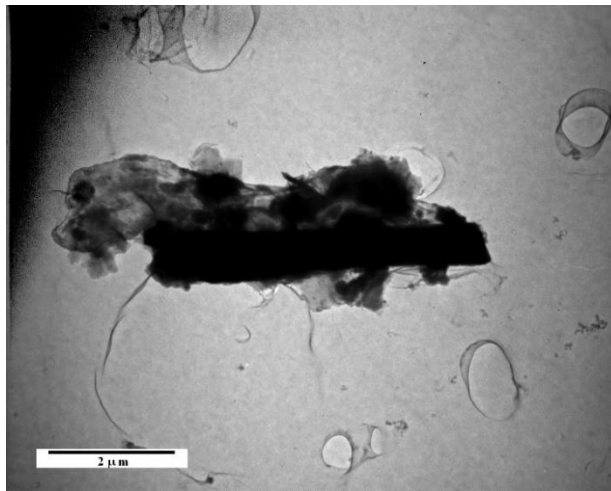


Figure 2. Electron micrograph (top), energy dispersive x-ray spectrum (middle) and selected area electron diffraction pattern (bottom) from actinolite structure observed in sample 0706-4 (3174478) collected at site location M5. The structure measures 5.5 μm in length and 0.7 μm wide (aspect ratio 7.86)

Final Laboratory Report

TEM ISO Analysis

Ms. Clair Wischusen
Fox Rothschild LLP
2700 Kelly Road
Suite 300
Warrington, PA 18976
US

Report Date: 08/11/2021
Sample Receipt Date: 07/30/2021
RJ Lee Group Job No.: LLH901997-34
Authorization/P.O. No.:
Samples Received: 10
Client Job No.:

Method: ISO 10312

TABLE 1 – Structures Length $\geq 0.5\mu\text{m}$, Length:Width Aspect Ratio $\geq 3:1$

Client Sample Number	RJLG Sample Number	Sample Description	Filter Area (mm ²)	Volume (liter)	Area Analyzed (mm ²)	Total Asbestos		95% Confidence Interval		Analytical Sensitivity (S/cc)	Total Asbestos Concentration (S/cc)		Asbestiform Amphibole	
						Chry	Amph	Chry	Amph		Chry	Amph	No.	S/cc
0728-1	3174953.HT	M7	385	1025	0.35555	<u>0</u>	<u>0</u>	0 - 3	0 - 3	0.0011	< 0.0011	< 0.0011	0	< 0.0011
0728-2	3174954.HT	M8	385	1033	0.35555	<u>0</u>	<u>0</u>	0 - 3	0 - 3	0.0010	< 0.0010	< 0.0010	0	< 0.0010
0728-3	3174955.HT	M1	385	1055	0.35555	<u>0</u>	<u>0</u>	0 - 3	0 - 3	0.0010	< 0.0010	< 0.0010	0	< 0.0010
0728-4	3174956.HT	M5	385	685	0.35555	<u>0</u>	<u>0</u>	0 - 3	0 - 3	0.0016	< 0.0016	< 0.0016	0	< 0.0016

NOTES

- Volumes provided by the client listed above were used to calculate analytical results and sensitivities.
- "<" indicates results less than analytical sensitivity. "---" indicates that sample was not analyzed.
- If RJ Lee Group, Inc. did not collect the samples analyzed, the verifiability of the laboratory's results are limited to the reported values.
- Abbreviations: N/A-Not Applicable, O/L-Overloaded, Chry-Chrysotile Asbestos, Amph-Amphibole Asbestos, NAS-Non-Asbestos Structures, f-Asbestos Fibers, F-Total Fibers.
- Samples will be held for 90 days and then disposed of per Federal regulations.
- Sample(s) for this project were analyzed at our Monroeville, PA (NVLAP Lab Code 101208-0, NY ELAP #10884) facility.
- 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.
- "Asbestiform Amphibole" section represents number and concentration of asbestiform amphibole structures included in "Total Structures" count and concentration.

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RJ Lee Group, Inc.

Final Laboratory Report (cont'd)

RJ Lee Group Job No: LLH901997-34
 Client Job No/Name:

Client: Fox Rothschild LLP
 Report Date: 08/11/2021

TABLE 1 – Structures Length $\geq 0.5\mu\text{m}$, Length:Width Aspect Ratio $\geq 3:1$

Client Sample Number	RJLG Sample Number	Sample Description	Filter Area (mm ²)	Volume (liter)	Area Analyzed (mm ²)	Total Asbestos		95% Confidence Interval		Analytical Sensitivity (S/cc)	Total Asbestos Concentration (S/cc)		Asbestiform Amphibole	
						Chry	Amph	Chry	Amph		Chry	Amph	No.	S/cc
0728-5	3174957.HT	M6	385	782	0.35555	0	0	0 - 3	0 - 3	0.0014	< 0.0014	< 0.0014	0	< 0.0014
0728-6	3174958.HT	M2	385	1036	0.35555	0	0	0 - 3	0 - 3	0.0010	< 0.0014	< 0.0010	0	< 0.0010
0728-7	3174959.HT	M4	385	1035	0.35555	0	0	0 - 3	0 - 3	0.0010	< 0.0010	< 0.0010	0	< 0.0010
0728-8	3174960.HT	M3	385	1035	0.35555	0	0	0 - 3	0 - 3	0.0010	< 0.0010	< 0.0010	0	< 0.0010
0728-9	3174961.HT	Field blank	385	0	0.35555	0	0	0 - 3	0 - 3	N/A	N/A	N/A	0	N/A
0728-10	3174962.HT	Field blank	385	0	0.35555	0	0	0 - 3	0 - 3	N/A	N/A	N/A	0	N/A

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RJ Lee Group, Inc.

Final Laboratory Report (cont'd)

RJ Lee Group Job No: LLH901997-34
 Client Job No/Name:

Client: Fox Rothschild LLP
 Report Date: 08/11/2021

TABLE 2 – Structures Length $\geq 5.0\mu\text{m}$, Length:Width Aspect Ratio $\geq 3:1$

Client Sample Number	RJLG Sample Number	Sample Description	Filter Area (mm ²)	Volume (liter)	Area Analyzed (mm ²)	Total Asbestos		95% Confidence Interval		Analytical Sensitivity (S/cc)	Total Asbestos Concentration (S/cc)		Asbestiform Amphibole	
						Chry	Amph	Chry	Amph		Chry	Amph	No.	S/cc
0728-1	3174953.HT	M7	385	1025	0.35555	0	0	0 - 3	0 - 3	0.0011	< 0.0011	< 0.0011	0	< 0.0011
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0728-3	3174955.HT	M1	385	1055	0.35555	0	0	0 - 3	0 - 3	0.0010	< 0.0010	< 0.0010	0	< 0.0010
0728-4	3174956.HT	M5	385	685	0.35555	0	0	0 - 3	0 - 3	0.0016	< 0.0016	< 0.0016	0	< 0.0016
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0728-6	3174958.HT	M2	385	1036	0.35555	0	0	0 - 3	0 - 3	0.0010	< 0.0010	< 0.0010	0	< 0.0010
0728-7	3174959.HT	M4	385	1035	0.35555	0	0	0 - 3	0 - 3	0.0010	< 0.0010	< 0.0010	0	< 0.0010
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RJ Lee Group, Inc.

RJ Lee Group Job No: LLH901997-34
 Client Job No/Name:

Final Laboratory Report (cont'd)

Client: Fox Rothschild LLP
 Report Date: 08/11/2021

TABLE 2 – Structures Length $\geq 5.0\mu\text{m}$, Length:Width Aspect Ratio $\geq 3:1$

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0728-9	3174961.HT	Field blank	385	0	0.35555	0	0	0 - 3	0 - 3	N/A	N/A	N/A	0	N/A
0728-10	3174962.HT	Field blank	385	0	0.35555	0	0	0 - 3	0 - 3	N/A	N/A	N/A	0	N/A

Authorized Signature: 
 Monica McGrath-Koerner, Scientist

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