

EAST ROCKHILL TOWNSHIP BOARD OF SUPERVISORS

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April 17, 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:

On behalf of East Rockhill Township, this office, in conjunction with other Township consultant's, have reviewed the proposed Qualitative Geologic Survey Sampling Plan for the Rock Hill Quarry, prepared by Earthres Group, Inc., dated April 3, 2019 (the "Plan"). Please accept the following comments on the Plan for consideration by the Pennsylvania Department of Environmental Protection ("PADEP" or "Department"). For the reasons explained below, the Plan does not provide for an adequate delineation of asbestos at the site.

1. Aggregate Storage Pile Sampling

The Plan only lists four aggregate storage piles, but more than four stockpiles are clearly visible on Figure 1A, which appears to be a Google Earth image from June 2018. Please ensure that all material stockpiled at the site is included in the scope of the Plan.

2. Aggregate Sampling Frequency

The origin and intent of PADEP's requirement of "one test per 1,000 tons of material or any fraction thereof..." is unknown. This requirement may be based on construction standards which are designed to characterize the mechanical properties of the material and not its hazardous composition. Other PADEP programs, such as for the management of fill, would require an increased sampling frequency. Furthermore, if the storage piles will be divided into "fractions," such as truck or crusher loads, then PADEP should require additional sampling than what is proposed in the Plan.

3. Rock Coring and Sampling Location

The rock coring locations are limited to the southeastern corner of the site in an area referred to as the "planned mining area." However, the "planned mining area" is not delineated on the figure and the area/amount of material to be mined is not otherwise described in the Plan. The rock coring locations should not be limited to this area but should cover the entire area covered by the mining permit, but a bare minimum should include coring of the boulder field along the southern and eastern sides of the site, at a minimum frequency no greater than that provided for the "planned mining area." If the mining permit allows the operator to mine and blast in other areas of the quarry, then these areas should also be surveyed for asbestos-containing mineral veins to understand which areas should be avoided.

4. Rock Coring and Sampling Frequency

While the amount of material in the "planned mining area" is not described in the Plan, the number and spacing of the rock cores shown on Figure 1B is insufficient. The cores are spaced approximately 75 to 250 feet apart, and many asbestos-containing mineral veins could exist between the cores and would therefore not be accounted for in the survey.

5. Boulder Field Size and Location

The Plan describes the boulder field as existing to the southern and eastern sides of the quarry pit, but does not offer any description of the size, depth, or amount of material contained in the boulder field. The Plan also does not describe the geology or the origin of the boulder field. Additionally, sampling 30 boulders on the surface is insufficient to characterize the horizontal and vertical extent of the material.

6. Boulder Field Sampling Bias

The boulder field is proposed to be sampled, and sample locations are to be selected, by the geologist in the field. The geologist employed by the operator should not be left with the discretion to pick and choose boulders to sample, particularly when there may be an interest in avoiding boulders with potential asbestos veins. For this reason, other PADEP programs regulating site remediation and waste characterization require sampling locations to be biased towards observed contamination or to be based on a truly randomized sampling grid to remove the potential for bias when selecting samples for analysis.

7. Wind Erosion of Aggregate Storage Piles

Wind erosion of the storage piles and open areas of the site can create significant air emissions depending on local wind conditions. If such wind erosion is expected or observed, the Plan should seek to determine the asbestos content of those surfaces that may erode and become airborne.

8. Roadway Dust Emissions

Heavy truck traffic on the unpaved roads at the site is a significant source of air emissions. The Plan should include an analysis of the silt and asbestos content of the road surface so that the potential emissions from this source can be understood.

9. Water Sampling Locations

The Plan states that water samples will be collected from four locations. However, there are clearly more than four water features present at the quarry. These locations should be included in the Plan and water and sediment samples should be collected from these locations.

10. Sediment Sampling

The Plan states that water samples will be collected from various locations including sedimentation basins. Since any asbestos present in the water would be expected to settle, the Plan should also include sediment sampling at these locations.

11. Sampling Oversight

Due to the potential bias that may be introduced during sampling, we request that a licensed geologist employed by the department be present during all sampling collection activities.

12. Potential for Asbestos Releases

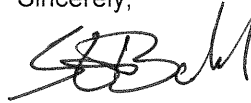
The CERCLA Reportable Quantity for friable asbestos is 1 pound. Emission calculations for the crushing/screening plant estimate potential particulate matter emissions to be 83 pounds *per hour*. Mining, blasting, wind erosion, and truck traffic will contribute additional particulate matter emissions. Therefore, even minimal amounts of asbestos contained in the quarry materials could easily create a "CERCLA release" once they have been rendered airborne by the operator. This suggests that a significantly more rigorous and quantitative analysis of the quarry material is necessary.

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Overall, the Plan is inadequate to delineate the presence of asbestos at the quarry and ensure that mining activities site will be protective of human health and the environment. We ask that PADEP require Earthres Group, Inc. to address each of the comments contained herein. Thank you for your consideration.

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

Sincerely,



Steven Baluh, P.E.
Township Engineer
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SB/mew

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