



April 17, 2020

Hanson Aggregates Pennsylvania, LLC
Attn: Mr. Andrew Gutshall, P.G., Environmental Manager
7660 Imperial Way
Allentown, PA 18195-1040

Re: Extension Request
Application No. 7974SM1
Rock Hill Quarry Operation
East Rock Hill Township, Bucks County

Dear Mr. Gutshall:

The Department has reviewed the April 2, 2020 request by Hanson Aggregates Pennsylvania, LLC (Hanson) for a nine-month extension of time to respond to the Department's March 2, 2020 comment letter on the Qualitative Geologic Survey Report (QGSR) for the Rock Hill Quarry Operation, Surface Mining Permit No. 7974SM1, East Rockhill Township, Bucks County.

The Department hereby extends the time for Hanson to respond to Comments 1, 2, and 3 of the Department's March 2, 2020 QGSR comment letter to May 31, 2020.

The Department hereby extends the time for Hanson to respond to the last paragraph of the Department's March 2, 2020 letter, which requests additional testing of existing samples, to June 30, 2020. This additional time allows for additional analysis and reporting to be done in order to provide the information required in the last paragraph.

Because the site is anticipated to remain idle following the removal of R. E. Pierson Materials' equipment, the Department also requires Hanson to revegetate disturbed areas capable of supporting plant growth. Please identify appropriate areas and submit a plan to revegetate them congruent with the current operational restrictions. Please submit this plan by May 31, 2020.

The January 2019 air sampling noted in your April 2, 2020 letter was conducted soon after the first confirmation that there was asbestos at the Rock Hill Quarry location and was preliminary. Additional sampling was required in the Plan Approval issued to R.E. Pierson but was not conducted due to the December 5, 2018 Cease Order. Based on the investigations and research conducted since then, a substantively different air sampling program than was conducted in January 2019 would be required to gain Department approval. This would include a detailed examination of the sampling schedule, sampling methodologies, sampling equipment, sampling locations, and laboratory analytical methods. Because of this, the Department cannot consider the results of the January 2019 testing to be a reasonable demonstration of the risk of asbestos exposure to those on or off site.

Therefore, the Department requests Hanson to submit a draft asbestos monitoring plan, for our approval, which comprehensively monitors for airborne asbestos exposure, both during periods of activity at the quarry as well as during times of inactivity. Please submit a detailed draft plan

by May 31, 2020. This draft will serve as a basis of a review process, possibly including technical discussions with Hanson and its contractors. The Department will not approve this plan until we are assured that it is scientifically supported and protective of public health.

In a letter dated September 20, 2019, the Department requested that Hanson provide additional information and testing for naturally occurring asbestos at the Rock Hill site. The information requested included the following:

1. Conduct transmission Electron Microscopy using EPA Method 600/R-93/116 (or equivalent) analysis for asbestos on all rock samples collected at the Rock Hill Quarry,
2. Prepare suitable samples for petrographic analysis,
3. Resample all the water sampling locations using EPA Method 100.1 and
4. By October 7, 2019, provide the sampling locations (boulder, core and aggregate) for all rock samples.

On December 18, 2019, the Department sent a second letter to Hanson stating that items 1, 2 and 3 outlined in the Department's September 20, 2019 letter had not been received. The Department informed Hanson that the requested information was due to the Pottsville District Mining Office by January 20, 2020.

On January 8, 2020, Hanson requested an extension to the Department's due date of January 20, 2020 as it was Hanson's understanding that the Department was preparing a comment/response document regarding the QGSR and believed a reasonable time extension would allow Hanson to respond to the items outlined in the Department's September 20, 2019 letter along with the Department's comments on the QGSR in a single submission. The Department agreed that a single submission from Hanson would be acceptable and on March 2, 2020, the Department provided Hanson with comments on the QGSR including a due date of April 6, 2020 to address the additional sampling and analysis requirements detailed in the Department's September 20, 2019 and the March 2, 2020 letters.

As explained above, the Department has granted multiple time extensions allowing Hanson to address the additional sampling and analysis requirements. The Department believes the extensions granted in this letter are reasonable and will facilitate timely review of this important information.

If you have any questions concerning this letter, please contact me at 570.621.3118.

Sincerely,



Gary A. Latsha
District Mining Manager
Bureau of District Mining Operations

cc: John J. Stefanko, Deputy Secretary for Active and Abandoned Mine Operations
Daniel Sammarco, P.E., Director of District Mining Operations
Michael Kutney P.G., Mining Permit Chief
Tom Boretski, Surface Mine Conservation Inspector Supervisor
Amiee Bollinger, Surface Mine Conservation Inspector
James Rebarchak, Air Quality Program Manager
Jillian Gallagher, Air Quality Environmental Group Manager
Shawn Mountain, Air Quality District Supervisor
Robert Fogel, Local Government Liaison
Virginia Cain, Community Relations Coordinator
Sachin Shankar, Assistant Director Southeast Regional Office
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County of Bucks
East Rockhill Township
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