

December 8, 2022

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

Re: Approval of Activity Based Sampling Event 3: Stockpile Movement
Surface Mining Permit No. 7974SM1
Rock Hill Quarry Operation, East Rock Hill Township, Bucks County

Dear Operator:

The Department of Environmental Protection (DEP) is in receipt of the test results of the October 11, 2022 Combined Activity-Based Sampling Events 2: Equipment Delivery and 5: Site maintenance. Please proceed with the Activity-Based Sampling Event 3: Stockpile Movement and apply the following conditions:

1. Please include two air sampling monitors at each of the eight sampling points: M-1 to M-8. Please set one sampling monitor to run during the time the activity is occurring and set the sampling rate to match the duration of the activity. For example: if the activity is to be projected to last 4 hours and your sample volume target is 1200 L, set the rate at 5 L/Minute or if the activity is to be projected to last 5 hours with a 1200 L volume target, set the sampling rate to 4/L/Minute.

Please set a second sampling monitor at each monitoring point to run at a lower rate during the entire workday that the activity-based sampling is occurring.

The quantity of air collected in each sample and the grid openings counted in sample analysis must achieve an analytical sensitivity of 0.001 structures/cc.

2. Please report the number and dimensions of the grid openings on the sample filter examined and used to calculate the area analyzed in the Laboratory analysis.
3. Please include Chain of Custody documents with the sample results along with the analyst bench sheets.
4. Please provide the list of the equipment that will be delivered and operated on the Rock Hill Quarry Site.
5. Please provide a description of the Stockpile Movement activities and an estimate of the number of hours the Stockpile Movement activities will take prior to the activity taking place.

6. Please maintain continuous operation of the autonomous weather station at the Rock Hill Site to monitor and record wind speed, wind direction, relative humidity, temperature, and precipitation data prior, during and after the activity-based sampling and provide this information on the weather data sheets.
7. Please conduct activity-based sampling only after three days of dry weather with no precipitation and do not conduct the sampling if these conditions are not met.
8. Please provide GPS vehicle tracking data logs for each vehicle or construction machine used in the Site maintenance activity event. Please include tracking data for the water truck and front-end loader (if used) during this event and other events.
9. Please schedule the “activity” portion of the activity-based sampling during the middle portion of the sampling period timeframe. Make every effort to balance pre-activity air sampling with post-activity air sampling.
10. Please conduct sampling with all eight air sampling monitor stations operating. Incomplete sampling results will nullify the activity-based sampling event.
11. DEP directs that the method of counting fibers is expressed below with the intent that this is the standard that shall be used when determining if corrective actions are needed to improve dust controlling Best Management Practices.

The analytical methods and laboratory analysis for asbestos in air analysis to be utilized as part of this plan shall be those described in ISO 10312-2019-10 “Ambient Air – Determination of Asbestos Fibers – Direct Transfer Transmission Electron Microscopy Method”, as modified by Page C-3 of EPA’s “OSWER Directive #9200.0-68, September 2008, Framework For Investigating Asbestos-Contaminated Superfund Sites”, which states that “Under the ISO method, two specific counting schemes are detailed. The first scheme is more general and allows for the counting of fibers that are 0.5 μm in length or greater and have aspect ratios of 5:1 or greater. In routine practice, TEM is able to resolve fibers down to approximately 0.1 μm in width, as compared to the resolution for routine PCM (0.25 μm). Therefore, short thin fibers that would not be detected using PCM will be detected using TEM under the general counting scheme. EPA recommends modification of the aspect ratio to 3:1 for this counting scheme”.

If the above analysis confirms asbestos fiber concentrations in excess of 0.01 fiber/cc in any sample, then corrective action requirements are triggered.

Hanson may choose to do comparative analyses and report the concentrations of Elongate Mineral Particles (EMP/cc) in the samples as described and proposed in the December 6, 2021 response to Item 4. Technical Deficiency 6 of the DEP October 21, 2021 comment letter. If Hanson chooses to do so, Hanson must provide the specific Standard Operating Procedure used to define an EMP in this analysis.

12. Please obtain the results from this activity-based sampling event and provide those results to the DEP before conducting the next sampling event.

Please proceed with Activity Based Sampling Event 3: Stockpile Movement at the earliest opportunity.

Should you have any questions, please contact this office.

Sincerely,



Richard E. Tallman, P.E.
Environmental Engineer
Bureau of District Mining Operations

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