

June 7, 2021

*Via Email*

Mr. Richard E. Tallman, P.E.  
Environmental Engineer  
Bureau of District Mining Operations  
Pennsylvania Department of Environmental Protections

**Re: Hanson Aggregates PA, LLC Response to "Elevated Review Technical Deficiencies, Application No. 7974SM1C10, Rock Hill Quarry Operation, East Rockhill Township, Bucks County", dated April 12, 2021**

Dear Mr. Tallman:

Rockhill Environmental Preservation Alliance (REPA) has become aware that Hanson Aggregates PA, LLC intends to request yet another extension for responding to the Department's comments so that they can revise the scope of their current permit application discussed in the letter to Mr. Andrew Guttshall in the above-mentioned memorandum. As set forth in the attached June 7, 2021 letter, REPA objects to this request and once again calls on the Department to fulfill its responsibility and permanently cease all operations at the Rockhill Quarry.

Very truly yours,



Mark L. Freed, Esquire  
For CURTIN & HEEFNER LLP

Enclosure

cc (via email):

The Honorable Thomas Wolf, Governor of Pennsylvania  
The Honorable Patrick McDonnell, Secretary, PA-DEP  
The Honorable Brian Fitzpatrick, U.S. Representative PA-01  
The Honorable Steven Santarsiero, 10th Senatorial District  
The Honorable Craig Staats, PA's 145th Legislative District  
The Honorable Diane Ellis-Marseglia, Chair, Bucks County Board of Commissioners  
The Honorable Robert Harvie, Jr., Vice Chair, Bucks County Board of Commissioners  
The Honorable Gene DiGirolamo, Bucks County Board of Commissioners  
Steven Baluh, P.E

Mr. Richard E. Tallman, P.E.

June 7, 2021

Page 2

Marianne Morano, East Rockhill Township Manager  
Megan Banis-Clemens, Pennridge School District, School Board Member  
Amiee Bollinger PADEP  
Virginia Cain, PADEP  
Robert Fogel, PADEP  
Erika Furlong, PADEP  
Craig Lambeth, PADEP  
Shawn Mountain, PADEP  
Patrick Patterson, PADEP  
James Rebarchak, PADEP  
Daniel Sammarco, PADEP  
Sachin Shankar, PADEP  
Gary Latsha, PADEP  
Doug White, PADEP  
Michael Kutney, PADEP  
John Stefanko, PADEP  
REPA



June 7, 2021

Mr. Richard E. Tallman, P.E.  
Environmental Engineer  
Bureau of District Mining Operations  
Pennsylvania Department of Environmental Protections

**Re: Hanson Aggregates PA, LLC Response to “Elevated Review Technical Deficiencies, Application No. 7974SM1C10, Rock Hill Quarry Operation, East Rockhill Township, Bucks County”, dated April 12, 2021**

Dear Mr. Tallman:

Rockhill Environmental Preservation Alliance (REPA) has become aware that Hanson Aggregates PA, LLC intends to request yet another extension for responding to PA DEP comments so that they can revise the scope of their current permit application discussed in the letter to Mr. Andrew Guttshall in the above-mentioned memorandum.

REPA is appreciative of PA DEP’s comprehensive efforts to assess and mitigate hazards associated with mining in a quarry where Naturally Occurring Asbestos is present in the rock. Your letter of April 12, 2021 demonstrates an encouraging commitment to a thorough and objective evaluation and to an expeditious resolution of dangerous asbestos exposure risks that have been plaguing the community for more than 3 years.

However, an applicant needs to present a sound argument for an extension and, in this case, a do-over is not an acceptable basis for Hanson’s intended request to revisit their scope. REPA believes the following DEP comments, among others, already provide Hanson with ample opportunity to modify the scope, and any scope revision would be part of the responses to DEP’s comments, not independent of them:

*“Please explain how the mining activities described in the above passages factor into Non Scheduled Site Maintenance activities or in the proposed minimum 500 tons per year of stockpile crushed aggregate. It appears the described mining activities are for full site mining development, are included with Non-Scheduled Site Maintenance, and conflict with the proposed activities described for the immediate future at the Rockhill Quarry.”*

*“Please provide a detailed all-encompassing site-specific NOA and EMP guidance document for the Rock Hill Quarry addressing sampling, analysis, monitoring, and controlling NOA & EMP transmission resulting from any operation at the Rock Hill Quarry via air, water or aggregate production and transportation.”*

To assist with a timely response DEP also offers Hanson means for communications to resolve any questions related to the DEP comments of April 12, 2021. Additionally, the July 6, 2021 deadline for

Hanson's response, presumably, would have been established by DEP with full awareness of the required effort and allowing for potential communications needed to meet this target date, as follows:

*“Should you have any questions regarding the identified deficiencies, please contact me to discuss your concerns or to schedule a meeting. If you believe the stated deficiencies are not significant, you have the option of declining and asking the Department to decide based on the information you have already made available. Please keep in mind that if you ignore this request or fail to respond to all of the deficiencies listed above by July 6, 2021, your application may be denied.”*

Expectations were clearly stated and REPA insists that DEP honor the July 6, 2021 deadline. Allowing Hanson yet another extension is unacceptable, particularly for the purpose of revising a scope that is already in effect.

As previously noted in numerous REPA communications with DEP, Hanson's response, to date, continues to be unacceptable. There is no safe way to conduct mining operations in the Rockhill quarry where NOA can be found throughout the diabase. REPA reaffirms our call on PADEP to fulfill its responsibility to protect the community from deadly asbestos related diseases by permanently cease all operations at the Rockhill Quarry.

Respectfully yours,  
Rockhill Environmental Preservation Alliance, Inc.

cc: The Honorable Thomas Wolf, Governor of Pennsylvania  
The Honorable Patrick McDonnell, Secretary, PA-DEP  
The Honorable Brian Fitzpatrick, U.S. Representative PA-01  
The Honorable Steven Santarsiero, 10<sup>th</sup> Senatorial District  
The Honorable Craig Staats, PA's 145<sup>th</sup> Legislative District  
The Honorable Diane Ellis-Marseglia, Chair, Bucks County Board of Commissioners  
The Honorable Robert Harvie, Jr., Vice Chair, Bucks County Board of Commissioners  
The Honorable Gene DiGirolamo, Bucks County Board of Commissioners  
Steven Baluh, P.E  
Marianne Morano, East Rockhill Township Manager  
Megan Banis Clemens, Pennridge School District, School Board Member  
Amiee Bollinger PADEP  
Virginia Cain, PADEP  
Robert Fogel, PADEP  
Erika Furlong, PADEP  
Craig Lambeth, PADEP  
Gary Latsha, PADEP  
Shawn Mountain, PADEP  
Patrick Patterson, PADEP  
James Rebarchak, PADEP  
Daniel Sammarco, PADEP  
Sachin Shankar, PADEP  
Doug White, PADEP  
Michael Kutney, PADEP  
John Stefanko, PADEP