

Comment #	Comment	Commenter #s	Category	Response
1	What does the EPA protect? Who are we influencing? I may have been born at night but it wasn't last night and as for trusting a federal government agency to actually do their job and really protect the environment and our community, well I'm sorry but I really don't have much faith in that happening. I wish I had a better solution other than writing some over-lobbied governor or senator. If you have a solution any solution please just do it. Your community is being dismantled stone by stone.	6	Overall Permitting Issues	This permit application is in front of the Pennsylvania Department of Environmental Protection (DEP). DEP is required by law to review permit applications such as SGI's in accordance with established laws and regulations and the Pennsylvania Constitution. DEP takes seriously its obligations to do this.
2	SGI has failed to "affirmatively demonstrate" [the applicant or related party, as indicated by past or continuing violations, has not shown a lack of ability or intention to comply with the act or the Surface Mining Conservation and Reclamation Act (52 P. S. §§ 1396.1-1396.19), 25 Pa. Code § 77.126(a)(6). The paltry fines imposed by PA DEP are not a deterrent to SGI's violative actions. I was personally informed by a PA DEP employee that once the fine is paid, "the violation no longer exists." That interpretation of the law undermines the clear intent of the statute and ignores the literal terms "as indicated by past or continuing violations". How else could PA DEP determine "a lack of ability or intention to comply with the act * * *" without reference to records of past violations? These violations do not disappear. Indeed, the downstream effects of green grit are horrifying, and we do not know the long term repercussions of these discharges. With respect to SGI, and predecessor companies, repeated violations are clear evidence of "lack of ability or intention" to comply with the law. And it is not just the violations documented by PA DEP that must be considered under the clear terms of the law.	32	Overall Permitting Issues	See response to comment 1. When DEP issues a violation to a noncoal mining company, once the associated penalty fee is paid the violation will remain on the company's compliance record for a period of two years. Currently, SGI has a single violation that appears on a search of its compliance record. The only recent violation that was issued by DEP Mining was for an effluent exceedance at their NPDES outfall "001" from a sample on 7-23-2018 (this is from the "Mill Ponds" of the Charmian Permit for "TSS"). A Compliance Order was written for this on 8-10-2018 and a monetary fine followed. SGI has taken measures to prevent an occurrence like the 7-23-2018 event. They installed new pumps on their adjacent "Pitts Quarry" ponds that send water into the Pitts Quarry bottom, when rainfall becomes too great. There they can manage it over a longer period of time and release it slowly. They have begun a new treatment system for the Mill Ponds. A "Pressurized Media Filtration System" is also being used along with an approved flocculant and longer settling time in the ponds.
3	SGI has failed to concurrently reclaim land "disturbed" by its vast surface mining operations as required by 25 Pa. Code § 77.595. According to SGI, the Western Ridge pit ceased to be quarried in 1996. That is over two decades ago! While SGI is fully able to scrape and destroy in order to fulfill customers' orders, it provides no explanation whatsoever regarding its failure to reclaim the Western Ridge pit. Two decades have lapsed: that hardly can be considered "concurrent" reclaiming. This is an example of SGI flouting the existence of applicable law, and this flouting of law is a "violation" under the above-referenced statute, 25 Pa. Code § 77.126(a)(6).	32	Overall Permitting Issues	SGI has implemented and is continuing to implement the DEP-approved reclamation plan for the West Ridge Quarry in accordance with its terms. The approved reclamation plan for the West Ridge Quarry Pit provides for reclamation in the following manner: fine crushed rock will be backfilled until it has filled to the quarry rim. After that point, the material will be placed in small lifts and compacted and shaped into a pile or mound. The final overall slope of the fill will have an overall grade of 3:1. Upon reaching final configuration in each portion of the pile/mound area, the outer slopes are reclaimed with soil and seeded to prevent erosion. Once placement of the material in the pile/mounded area is completed, the approved reclamation plan consists of planting grasses and completing reforestation activities. Backfilling of the West Ridge Quarry is proceeding and is an active operational area, with placement of fines generated from operations of the adjacent Pitts Quarry. The backfilling will continue in accordance with the DEP-approved plan for several more years. For additional information, see §13.2 of SGI's November 12, 2018 Responses to Public Comments ("SGI First Responses") and §15.2 of SGI's July 3, 2019 Responses to Public Comments ("SGI Second Responses").
4	Next, they will insist they have to follow the metabasalt into the Michaux State Forest. Will DEP allow that expansion? Where does it stop? Where do environmental issues (our future), health, and quality of life for the local community get to say STOP against such greed?	55	Overall Permitting Issues	Should the Northern Tract Quarry application be approved, it will only authorize mining within the permit area. Any proposed future expansion will require a new application and a separate review by the Department.
5	Any DEP action to approve NT Quarry must also require that an escrow fund for reclamation be established at the outset of work, increased annually to cover any impact of inflation, and SGI should undertake reclamation of the old quarry as the work proceeds, not decades in the future. SGI should also proceed to restore Miney Branch.	27, 28	Overall Permitting Issues	The Department has a bonding program that requires all permittees to post a bond amount, calculated on a site by site basis, to account for any unfinished reclamation should the permittee become financially incapable of completing it. The bond amount is updated periodically and the calculations account for inflation. SGI will also be required to conduct concurrent reclamation in accordance with 25 Pa. Code § 77.595.
6	Many questions were asked of PA DEP at the July 2018 hearing, and the only responses I have seen were from SGI, with no indication of PA DEP's opinion. Does this mean PA DEP endorses SGI's responses? This leads to a very confusing situation for the public-we are addressing questions and comments to PA DEP, the agency that is supposed to be looking out for our interests, and hearing nothing back. Of course SGI should be allowed to respond, but they have a huge conflict of interest and, just as importantly, SGI is not the decision maker. Why hasn't PA DEP provided responses to the questions directly addressed to it last July?	14	Overall Permitting Issues	The Department has delayed responding to comments received from the public at the July 23, 2018 and January 30, 2019 public hearings, as well as written comments received, until the Department was able to gather all necessary information to provide complete responses. The Department developed responses to these comments independent of SGI's efforts to respond to these comments.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
7	We have each experienced a deep sense of fear when exposed to an SGI blast. The house literally shakes. We feel the blast. We feel unsafe. No reassurance from SGI that the blasts are being tracked by seismograph or that they are within acceptable limits can help to calm a child's fear or my own for that matter. We also hear and see the effects of the mining daily on the surface of the land and in the water of Tom's Creek which runs through our property.	3	Overall Permitting Issues	PA regulations require that blasting be monitored for ground vibration and air blast. PA regulations set regulatory limits for airblast and ground vibration and prohibit damage. PA Code Title 25 Section 211.151(c) states that all blasts shall be conducted in a manner that meets the maximum allowable peak particle velocity as indicated by the U.S.B.M. Z-Curve at the closest building or other structure designated by the Department. PA Code Title 25 Section 211.151(d) states that blasts shall be conducted to control air blast so that it does not exceed the maximum allowable air blast of 133 dB. The Department's stringent limits for ground vibration and airblast are set so that levels below the limits will not cause damage to buildings or other structures. It is required under the regulations that blasting be monitored for ground vibration and air blast. The seismograph reports of the site blast records indicate the air blast levels generated by the blasting. If the air blast levels from the blasting exceed 133 dB at a building it is a violation of the regulations and an enforcement action will be taken. So far ground vibrations and air blast generated from the blasting at the SGI quarry have not exceeded the Department's stringent regulatory limits. Although you may feel or hear your house respond to blasting vibrations your house will not be damaged by vibrations below the Department's regulatory limits.
8	Early on many weekday afternoons, SGI sets off a deafening explosion that shakes our home and others nearby. It is frightening and disruptive.	78	Overall Permitting Issues	Please see the response to comment 7 (blasting).
9	Make sure that SGI operates according to best practices.	73	Overall Permitting Issues	SGI must operate in accordance with the established laws, regulations, and the Pennsylvania Constitution.
10	An advertisement for the Northern Tract Quarry application or the July 23rd informal public conference was not posted on the Department's website, nor in the Record Herald, and SGI's advertisement for the Northern Tract Quarry application was buried in the advertisements section of the Gettysburg Times, failing to satisfy minimum legal notice requirements.	32	Overall Permitting Issues	Notices were published in both the Record Herald and Gettysburg Times advertising the public hearings for two weeks prior to the July 23, 2018 and January 30, 2019 public hearings, satisfying public notice requirements.
11	SGI has failed to set forth a concurrent reclamation plan for Pine Hill, and reclamation of existing quarries is wholly inadequate.	32	Overall Permitting Issues	The post-mining land use and reclamation plan for the proposed Northern Tract Quarry will consist of an unmanaged water impoundment surrounded by forestland providing wildlife habitat and access to water in the impoundment for fire suppression and emergency services (Hamiltonban Township Conditional Use Permit). A detailed outline of the proposed reclamation plan can be found in Module 20 of the Northern Tract Quarry permit application. The previously mined Charmian Quarry is currently backfilled using the overburden soils and crushing by-products (rock fines) and blasted cap rock from the existing Pitts Quarry. Likewise, Pitts Quarry will be backfilled using the overburden soils and crushing by-products (rock fines) and blasted cap rock from the proposed Northern Tract Quarry. SGI's reclamation plans are in accordance with the requirements for concurrent reclamation found in 25 Pa. Code § 77.595.
12	The lack of adequate reclamation at SGI's adjacent properties should be considered during the review of the Northern Tract Quarry application. SGI shouldn't be issued another mining permit until they complete reclamation on these properties.	83	Overall Permitting Issues	Please see response to Comment 11 (reclamation).
13	How far has mining progressed on the Pitts Quarry?	50	Overall Permitting Issues	As of September 20, 2019, Pitts Quarry has advanced mining to a bottom elevation of 883 feet.
14	Does the intensity of blasting increase with depth of mining?	50	Overall Permitting Issues	The levels of vibration may increase if there is an increase in the depth of blast holes because the largest amount of explosives detonated during the detonation sequence of a blast and the distance to a point of concern are the strongest influences on ground vibration or air blast levels. However, blasting vibration intensity is directional and the orientation of the pattern of blast holes and the point of initiation of the blast to the structures surrounding the blast also influence vibration levels at the nearby structures. However, all permittees must comply with the Department's ground vibration and airblast regulatory limits, which are set to ensure that, if adhered to, vibration related damage will not occur to buildings or other structures. The Department's conservative vibration limits come from U. S. Bureau of Mines research (RI 8507-Ground Vibration and RI 8485-Airblast). The limits are based on scientific research and have been adopted by other state regulatory agencies, the Federal Office of Surface Mining and Reclamation (OSM), the American National Standards Institute (ANSI) and the American Insurance Services Group (AISG).
15	What mining depth will SGI be permitted to mine to on the Northern Tract Quarry should it be approved?	50	Overall Permitting Issues	The permittee (SGI) requests a final mining depth for the Northern Tract Quarry of 490 feet to an elevation of 740 feet MSL. The permit will be issued to a final mining depth of 490 feet to an elevation of 740 feet MSL with a condition requiring the permittee to provide updated hydrologic information that includes a current groundwater model report to validate the predicted groundwater conditions within the mining area at a mining depth of 289 feet (950 feet MSL).
16	Public notice of the application and public hearing were inadequate to ensure actual notification of the proposed surface mine to interested parties. SGI and the Department published notice of the application and the public hearing for July 23, 2018 in the Gettysburg Times. While residents of Adams County regularly read the Gettysburg Times, residents of Franklin County rely upon the Record Herald.	32	Overall Permitting Issues	Please see response to Comment 10 (public notice).
17	SGI's reclamation plan is incomplete and does not demonstrate compliance with the Noncoal Surface Mining Conservation and Reclamation Act and its implementing regulations. Each application for a noncoal surface mining operation must include a "complete and detailed plan for the reclamation of the land affected." The reclamation plan must include a "detailed timetable for the accomplishment of each major step in the reclamation plan" as well as the estimated cost for each step and "total cost to the operator." SGI's application materials do not provide a timetable for each step of reclamation, estimated costs of reclamation, or a demonstration that reclamation occur concurrently with the progression of the mining operation.	32	Overall Permitting Issues	The post-mining land use and reclamation plan for the proposed Northern Tract Quarry will consist of an unmanaged water impoundment surrounded by forestland providing wildlife habitat and access to water in the impoundment for fire suppression and emergency services (Hamiltonban Township Conditional Use Permit). A detailed outline of the proposed reclamation plan can be found in Module 20 of the Northern Tract Quarry permit application. Module 10 of the Northern Tract Quarry permit application section 10.6 Reclamation Timetable, describes the estimated timetable for each phase of mining and reclamation. Module 10 also includes the bond calculation summary, which outlines the total cost of reclamation for the proposed Northern Tract Quarry.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
18	Even should SGI successfully complete reclamation of Pine Hill, SGI has not proposed a higher or better land use for the mining area. Where an applicant proposes restoring the parcel to something other than the approximate original contour, as is the case here, the applicant must demonstrate that the reclaimed land will be capable of supporting higher or better land uses than current.	32	Surface Water Quality	SGI has satisfied its regulatory obligations pursuant to 25 Pa. Code § 77.462, post-mining land uses and alternative restoration. The proposed post-mining land use of an unmanaged water impoundment surrounded by forestland is compatible with adjacent land use and consistent with applicable land use policies, plans and programs and Federal, State and local law. The proposed operation will be long term and SGI's submission showed the ratio of mineral deposit to overburden is such that AOC backfilling cannot be achieved.
19	What other vibration studies have been conducted and submitted to the PADEP?	41	Overall Permitting Issues	Please see response to comment 14 (blasting).
20	Did SGI file an Environmental Impact Statement? Did it satisfy local, state, and federal regulations?	41	Overall Permitting Issues	A federal Environmental Impact Statement (EIS) is not required for this permit. SGI submitted the required Socio-Economic Justification (SEJ) pursuant to 25 Pa. Code § 105.16, Environmental, Social and Economic Balancing. DEP reviewed SGI's submission and determined it satisfies the applicable laws and regulations.
21	Has the PADEP accepted said Environmental Impact Statement as satisfactory proof that the proposed mining operations would not constitute violations to any local, state, and federal environmental statutes?	41	Overall Permitting Issues	Please see response to comment 20 (SEJ).
22	How have SGI and PADEP addressed any health-related complaints from neighboring landowners and the community in general?	41	Overall Permitting Issues	Any complaints received by DEP related to SGI's quarry operations are properly investigated. To date, DEP has received 2 complaints regarding SGI's operations, both of which were blasting related. DEP has not received any health-related complaints regarding SGI's operations to date. See also the response to Comment 390, regarding air quality issues.
23	Will the existing quarry operations be conducted at the same time as the proposed mining?	41	Overall Permitting Issues	Should the Northern Tract Quarry Application be approved, operations there would coincide with operations at the existing Pitts Quarry and Charmian Plant.
24	Why was there no notice for the public meeting held on July 23, 2018, on the PADEP's website?	41	Overall Permitting Issues	Please see response to comment 10 (public notice).
25	With regards to all existing permits for SGI's operation at the current location in Hamiltonban Township Adams County PA: are there any "grandfathered permits," licenses, or out of date licenses/permits that were reissued and/or have precedence over existing regulations? In other words, do any of SGI's current operations and/or proposed operations allow them to conduct operations outside of existing regulations?	41	Overall Permitting Issues	SGI's operations at the Charmian facility are all subject to existing regulations and are not subject to "grandfathered permits." SGI's NPDES permits are subject to renewal every five years, and during the course of renewal reviews, DEP considers whether, based on updated information, the facility is in compliance with current applicable water quality standards, effluent limitations or other legally applicable requirements. See 25 Pa. Code § 92a.75(b). Similarly the Air Quality Operating Permit for the Charmian facility is subject to renewal every five years, with renewals based upon compliance with current standards. See 25 Pa. Code §127.401 et seq. SGI's active mining operations are required to comply with DEP's current noncoal surface mining regulations contained in 25 Pa. Code Ch. 77. Reclamation plans for each quarry are established as part of the permit issued at the time each respective quarry is authorized.
26	When the current mining operations blast, our house windows and garage doors rattle. If operations come even closer to our property, this will increase. This could lead to structural damage to our home.	53, 54	Overall Permitting Issues	Please see responses to comments 7, 14 & 19 (blasting). Ground vibration and air blast levels could increase but PA regulations require that blasts are designed and conducted in a manner that meets regulatory requirements which include limiting ground vibration and airblast to levels which will not cause damage to buildings or other structures.
27	We know next to nothing about the reclamation plans for the 800-plus acres that SGI is mining. Has anything been reclaimed? If so, to what effect? The devastation has crept to the point where it is huge. SGI's site can be seen from space thanks to Google Earth. When will it end? Have they posted a performance bond? What happens if their business declines to the point where they simply walk away from the operation? SGI (formerly GAF/ISP) has changed hands at least four times since 2010 (ISP, SGI, then a subsidiary of Ashland Corporation, then a subsidiary of a holding company called Standard Industries).	21, 22, 23, 24, 25, 26, 30, 56, 57, 58, 65, 66, 67, 68	Overall Permitting Issues	See responses to comments 5 (bonding), 17, 18 (reclamation). The Department has a bonding program that requires all permittees to post a bond amount, calculated on a site by site basis, to account for any unfinished reclamation should the permittee become financially incapable of completing it. The bond amount is updated periodically and the calculations account for inflation. Any future operator will be required to maintain sufficient bonding.
28	DEP has failed to provide adequate notification of permit steps and invite public participation. There was essentially no mention of the July 23, 2018 permit hearing on DEP's web site (for one example). The published announcement was printed in the smallest readable font as an advertisement, not as a Public Notice. It contained no Permit or NPDES number. Public participation was supposed to occur when the permit plans were first submitted and this did not happen.	55	Overall Permitting Issues	Please see response to comment 10 (public notice).
29	An amazing and almost criminal willingness to allow the corporate entity of SGI (Standard Industries) to misinform DEP and to rely on the applicant's monitoring data and general narrative. Accepting again and again opinion for fact in their application. Allowing SGI to just not answer some questions!	55	Overall Permitting Issues	DEP has carefully reviewed SGI's submissions and technical data and has asked for more information and verification through technical deficiency letters where appropriate. DEP has also carefully reviewed and considered public comments and reports submitted with the comments during its review of this application.
30	I was told by an SGI representative at the July 23rd hearing that they had applied for a new mining permit because there is a limitation on how large one mine can be. SGI couldn't simply expand since they would become too large. This seems like transparent gaming of the system to bypass the law! Why is DEP allowing this?	55	Overall Permitting Issues	There is no regulatory limit on how large a noncoal mine can be. Pursuant to 25 Pa. Code § 77.141(f), additional acreage for mineral extraction shall be considered as an application for a new permit.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
31	Why is DEP not requiring SGI to completely reclaim the West Ridge Quarry before going forward with a permit process for a new quarry? And why is DEP not requiring concurrent reclamation of the Pitts Quarry? If SGI is establishing a new quarry this should not be allowed until they have finished reclaiming an inactive one. If the Northern Tract is not a new mine, then they are illegally expanding an existing mine.	55	Overall Permitting Issues	Please see response to comment 17 (reclamation). The previously mined Charmian Plant (West Flank) Quarry is currently backfilled using the overburden soils and crushing by-products (rock fines) and blasted cap rock from the existing Pitts Quarry. Likewise, Pitts Quarry will be backfilled using the overburden soils and crushing by-products (rock fines) and blasted cap rock from the proposed Northern Tract Quarry. Current reclamation includes approximately 14 acres on a hilltop below the "Headlap Plant" (near the railroad tracks) that was placed back into grasses and trees. Also, the Charmian Quarry was entirely backfilled with waste "fines" and spoil materials and will be topped with topsoil, seeded & mulched in the next couple of years. The proposed Northern Tract Quarry is a new mine permit application.
32	I really would encourage DEP to take a hard look at all the data from an objective independent third party standpoint before DEP moves forward with this.	40	Overall Permitting Issues	DEP is required by law to review permit applications such as SGI's in accordance with established laws and regulations and the Pennsylvania Constitution. DEP takes seriously its obligations to do this.
33	There is readily available information to the public on the SGI webpage. And I was very impressed by the up-to-date records from the Department of Environmental Protection available at the SGI office. Those records from the Department of Environmental Protection include date and times of dust samples, water samples from culverts, and the decibels for blasting, all of which were under the required marks. I was also impressed by their 100-year flood zone, which is a multi-million dollar settlement pond that settles all the dust from the water. Anyone can see the crystal clear outcome of the water from Old Waynesboro Road.	80	Overall Permitting Issues	DEP duly notes this comment.
34	We can have clean air and we can have clean water and we can have industry. All it takes is work. And we're all ready to keep working. And it shouldn't matter who's been here longer or who is closer or who was here first. What should be considered is how SGI has responded to the comments and concerns. What you all see during your inspections and what SGI's record has been.	81	Overall Permitting Issues	DEP duly notes this comment.
35	Issuance of any federal license - whether the permit is issued directly by the U.S. government, or by authority delegated by a federal agency to the states "triggers a Section 106 review." There are only a few statutory exceptions to specified agencies, and the U.S. Environmental Protection Agency is not statutorily excepted. While the Commonwealth of Pennsylvania has been delegated authority to issue NPDES permits, that delegated trust carries with it the responsibility to adhere to National Historic Preservation laws. See overlay of other applicable federal laws. https://www.epa.gov/npdes/other-federal-laws-apply-ndes-permit-program .	32	Overall Permitting Issues	SGI followed appropriate Department guidance and submitted a completed Project Review Form to the Pennsylvania Historic and Museum Commission (PHMC) on February 19, 2016. PHMC subsequently responded to SGI on March 18, 2016 and recommended that a Phase I archaeological survey be conducted at the proposed Northern Tract Quarry site. PHMC confirmed this correspondence in a letter to the Department on February 27, 2018. SGI completed the recommended Phase I archaeological survey and submitted the results to PHMC on March 22, 2018. PHMC completed their review of the survey, and reported their findings to the Department on April 23, 2018 that the proposed Northern Tract Quarry site would not impact any sites requiring protection on the National Register of Historic Places and that no further archaeological work would be necessary. Following the July 23, 2018 public hearing, the Department requested that PHMC conduct a follow-up review to confirm the findings in their April 23, 2018 letter, with emphasis on the historic sites identified at the public hearing (1863 Confederate Army Retreat Path, Monterey Historic District) on January 9, 2019. PHMC confirmed in an email to the Department on January 25, 2019 that the findings documented in the April 23, 2018 PHMC letter still stand.
36	My opinion is that this is a very well-run mine from what I've seen from the ones we've worked in. I see all the different mines and they're definitely better than the average, way better.	39	Overall Permitting Issues	DEP duly notes this comment.
37	It's important to me to let the local public know that SGI does stand by its commitment to protect the environment. I know this because I saw it and I lived it while I was employed. I was involved with many projects with the environment as a priority, whether it was making sure proper environmental controls were in place before and after any project. Or communicating with our local residents about blasting. I truly believe that SGI has been a good environmental steward, taking into account the very best interests for its employees and local residents.	52	Overall Permitting Issues	DEP duly notes this comment.
38	The great fear is that SGI will start mining the NT before they are finished at Pitts and before they have even finished the reclamation of West Ridge. Instead of offering any economic or social advantages for this permit approval, ISP/SGI only makes a negative argument: a direct threat to shut down the current operation at any time "depending on aggregate demand" and on whether they get what they want from this permit application! The company's sole economic "justification" is to not close down operations. In other words, if the State, County, Township do not let them destroy the environment as they wish then they will punish them by denying employment to 156 workers and denying local tax money to the township.	55	Overall Permitting Issues	Please see response to comments 20 (SEJ) and 31 (reclamation). SGI followed appropriate Department guidance and completed an Anti-Degradation Supplement for Mining Permits, required when permitting within a special protection watershed. In the Anti-Degradation Supplement, SGI indicated that non-discharge alternative use at the proposed Northern Tract Quarry will not account for the entire discharge, and completed the SEJ application. The information contained in the SEJ application effectively demonstrated that the combination of water quality protection measures (non-discharge alternatives use scaled to account for all precipitation events less than a 100 year/24 hour storm), limited extent of geologic resource (the proposed Northern Tract Quarry is an extension of one of 12 existing quarries of similar geologic material in North America, and the only existing quarry of similar geologic material in the northeastern United States), and local economic benefit (the maintenance of 147 jobs, 91% of which are filled by employees who live within 30 miles of the proposed quarry location, and the payment of \$255,000 in combined property and sales taxes to the local economy) meet the regulatory standard for social or economic justification for water quality degradation. It should be emphasized that if this SEJ is approved, it does not mean that water quality will be degraded, only that if some degradation were to take place, it would be socially and economically justified. This degradation would only be possible in the event of a precipitation event greater than a 100 year/24 hour storm.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
39	<p>As to the "Social" part of the justification, I hope that PADEP heard enough of the social problems caused by the current quarry operation during two days of public testimony to understand that a large scale quarry situated within a residential community cannot but cause misery (and probably ill health).</p> <p>The property on both sides of the quarry are zoned residential. People have been living there for generations, and now many people's lives have been ruined by the quarry. The beauty and peace of mountain land is why they came to live in the foothills of South Mountain, and both of those things have been taken away from them.</p>	55	Overall Permitting Issues	Please see response to comments 20 (SEJ), 31 (reclamation), and 38 (Anti-Degradation Supplement).
40	We have examined the permit application (011800301) and see that what is proposed is "mountain-top" removal - essentially destruction of a huge ecosystem-- as indicated in the attached schematic.	71	Overall Permitting Issues	Federal definition of Mountain Top Removal: "Mining of the an entire coal seam running through the upper fraction of a mountain, ridge, or hill by removing all of the overburden and creating a level plateau or gently rolling contour with no highwalls remaining." 30 CFR 824.11(a)(2). The mining plan proposed for the Northern Tract Quarry is not Mountain Top Removal.
41	Further, SGI appears to have a poor track record for land reclamation after previous mining operations. They have had some notable failures, e.g. in May 2011, which impacted nearby private land owners. They state that failure "cannot happen again," which is impossible to assure. They have not fully reclaimed Pine Hill which they were required to do.	71	Overall Permitting Issues	Please see response to comments 17 and 31 (reclamation). On May 5, 2011 a complaint was lodged to DEP Mining about photographs of a discharge into an Unnamed Tributary to Toms Creek from SGI (formerly ISP Minerals, Inc.). This was investigated by DEP and the Adams County Conservation District. No violations were cited, and it was noted that the erosion and sedimentation (E & S) controls appeared to be operating adequately. Current reclamation includes approximately 14 acres on a hilltop below the "Headlap Plant" (near the railroad tracks) that was placed back into grasses and trees. Also, the Charmian Quarry was entirely backfilled with waste "fines" and spoil materials and will be topped with topsoil, seeded & mulched in the next couple of years.
42	ENVIRONMENTAL CLEAN UP! By law SGI is required to reclaim at the same rate it destroys. At this writing there are three vast visible pits. One pit, known as the Western Ridge, has not been quarried since 1996. It's been over two decades since active mining operations ended and yet the Western Ridge remains an eyesore. SGI has no problem meeting customers' demands for greenstone but fails to meet the demands of the law. This is a pattern by SGI, all driven by corporate profits and greed. Please consider the costs associated with a massive clean up using taxpayer dollars as part of the PADEP social and economic study. Google Earth reveals all and this site is well on its way to superfund status. https://earth.app.goo.gl/yP-CxkP#googleearth	73	Overall Permitting Issues	Please see response to comment 41 (reclamation).
43	How many fewer years would SGI get if it did not mine the northernmost and northwesternmost slopes? Why is this not a reasonable trade-off to make?(See Clifford Frost 2/11/2019 PDF for Photograph)	14	Overall Permitting Issues	This comment starts from the incorrect premise that SGI's proposed Northern Tract mining operations would require "tradeoffs" between economic and environmental costs and benefits. For the reasons explained in much greater detail throughout SGI's application materials and First and Second Responses (see in particular the Application's Anti-Degradation Supplement in Module 24), SGI intends to develop the Northern Tract Quarry (including the northernmost and northwestern most slopes) in a manner that complies with all applicable environmental regulations and avoids negative environmental impacts.
44	In addition to the applicable statutory and regulatory requirements for the issuance of a noncoal surface mining permit, the Department must also ensure compliance with the Pennsylvania Constitution. Article I, Section 27 of the Pennsylvania Constitution ("Environmental Rights Amendment") reads: The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people. PA. CONST. ART. I, § 27.	45	Constitution	<p>DEP concurs that Article I, Section 27 of the Pennsylvania Constitution is a central consideration during DEP's review of environmental permit applications.</p> <p>Regarding the SGI surface mining and NPDES permit applications, DEP has fully considered the environmental effects of its action to approve the applications and has determined that these approvals will not result in the unreasonable degradation, diminution, depletion or deterioration of the environment.</p> <p>The permit application process itself regulatorily required SGI to provide extensive detailed information related to the environmental effects of the proposed Northern Tract Quarry, including general environmental resource information, a description of the hydrology and geology, groundwater and surface water information, vegetation, alternative water supply information, and land use considerations. 25 Pa. Code §§ 77.401-77.410.</p> <p>In addition, as extensively catalogued and detailed elsewhere in the Comment Response document and in the Review Memorandum issued concurrent with the SGI permits, DEP specifically required SGI to provide multiple rounds of additional and updated information as a result of the application review, public participation, multiple DEP technical deficiency letters, and DEP's awareness of historic resource issues, hydrologic and stormwater management matters unique to the SGI site, air quality concerns, general nuisance questions, surrounding natural resource and recreation concerns as well as the potential impact on the proposed activities on the local economy, and the presence of naturally occurring asbestos (NOA).</p>

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
				<p>The information was provided over an extended review period of several years, with multiple public hearings conducted and considerable public participation provided. Meanwhile, throughout the SGI application process, DEP's Cambria District Mining Office – which has considerable knowledge of and experience with oversight of the SGI operation – coordinated internally with other DEP mining offices, other DEP regional offices, and DEP's Central Office to evaluate the multiple mining and air quality issues raised as a result of this permit application. DEP thus brought to bear its own team of expert geologists, engineers, and other technical professionals to address the various issues raised by the SGI applications. In addition, DEP received input from multiple resource agencies, many of whom are also Article I, Section 27 trustees, such as the Pennsylvania Fish and Boat Commission, the Pennsylvania Department of Conservation and Natural Resources, the Pennsylvania Historical and Museum Commission, the Pennsylvania Department of Health, the U.S. Fish and Wildlife Service, the U.S. Mine Safety and Health Administration, and the U.S. EPA.</p> <p>By coordinating its action with multiple other DEP offices and other agencies, as well as with the Air Quality Program which issues permits for the processing activities at the existing Charmian facility, DEP has pursued issuance of the SGI permits in a holistic fashion. Further, the review and permitting was done in an impartial manner that gave due regard to the interests of both the current citizens and future citizens of Pennsylvania.</p> <p>Because of the presence of NOA in the bedrock in the area of SGI's facility, DEP provided an enhanced level of scrutiny that involved increased interaction with and reliance upon all stakeholders. As a result of that process, the Cambria District Mining Office in consultation with other DEP offices applied its geologic, engineering, and other technical expertise to the voluminous data and other information and determined that SGI's quarrying activities would present no undue risk to public health or the environment.</p> <p>Nonetheless, the SGI permit also contains numerous detailed special conditions to address the specific issues presented by the SGI application for the Northern Tract Quarry. These special conditions and other requirements of the permit build in multiple layers of protection and conservatism, including a groundwater monitoring well network, monitoring of wetlands and certain species, air quality monitoring, enhanced dust mitigation measures, additional record keeping requirements, and an Asbestos Air Monitoring and Mitigation Plan.</p> <p>In addition, because NPDES permits expire every five years, any issues that may arise in the interim will be part of DEP's periodic consideration. DEP may also revisit the conditions of the NPDES permit at any time if circumstances warrant and need not wait until another renewal period has passed.</p> <p>Further, as the depth of quarrying increases, SGI must provide updated monitoring and hydrologic information for DEP's consideration. As with the NPDES permit, DEP may revisit the mining permit at any time if circumstances warrant.</p> <p>By pursuing a vigorous review of the SGI permit application, DEP met its Article I, Section 27 obligations and satisfied its trustee duties by acting with prudence, loyalty and impartiality with respect to the beneficiaries of the natural resources impacted by the DEP decision.</p>
45	The people's fundamental, human right to clean air, pure water, and the preservation of the natural, scenic, historic, and esthetic values of the environment may not be unreasonably degraded by either direct state action or the action of third parties. <i>See Pa. Envtl. Defense Found. v. Com.</i> , 161 A.3d 911, 933 (Pa. 2017); <i>Center for Coalfield Justice, et al. v. DEP, et al.</i> , Dkt. No. 2014-072-B, 2017 Pa. Environ. LEXIS 52 (Pa. Env. Hrg. Bd. Aug. 15, 2017).	45	Constitution	Please see response to comment 44 (Article I Sec 27) .
46	Public natural resources that must be protected include "not only state-owned lands, waterways, and mineral reserves, but also resources that implicate the public interest, such as ambient air, surface and ground water, wild flora, and fauna (including fish) that are outside the scope of purely private property." <i>Robinson Twp. v. Com.</i> , 83 A.3d 901, 955-956 (Pa. 2013) (" <i>Robinson II</i> ").	45	Constitution	Please see response to comment 44 (Article I Sec 27) .
47	As an instrumentality of the Commonwealth, the Department serves as a trustee of the public natural resources protected by the Environmental Rights Amendment and is bound by the fiduciary duties of prudence, impartiality, and loyalty.	45	Constitution	Please see response to comment 44 (Article I Sec 27) .
48	The duty of prudence requires the Department to "exercise such care and skill as a man of ordinary prudence would exercise in dealing with his own property." <i>Pa. Envtl. Defense Found.</i> , 161 A.3d at 931.	45	Constitution	Please see response to comment 44 (Article I Sec 27) .
49	In order to fulfill the duty of prudence, the Department must engage in pre-action analysis that is capable of informing the agency of (1) whether degradation of the environment, and thus an intrusion into protected rights, is likely to occur as a result of permitted activity and (2) the degree of that intrusion. <i>See Robinson II</i> , 83 A.2d at 983, n. 60 (noting that data is needed to access impact upon public natural resources and describing trust beneficiaries' right to information necessary to enforce rights or trust limitations); <i>see also</i> Kenneth T. Kristl, "The Devil is in the Details," 28 Georgetown Envtl. L. Rev. 589,592 (2016) ("[A]ssessments of environmental effects before actions are taken are key to providing the information critical to discharging the constitution's requirement.").	45	Constitution	Please see response to comment 44 (Article I Sec 27) .

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
50	Large scale surface mining by Specialty Granules, LLC (SGI) has degraded and in some instances totally destroyed the natural, scenic, historic, and esthetic values of our environment, Pa. Const. Art. I, § 27. As trustee of these environmental constitutional rights, PA DEP has the duty to protect our community from further degrading of these critical rights. While all citizens have the right to enjoy economic benefits from ownership of land, there is no right to destroy the fundamental, indeed life-giving rights to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of Commonwealth citizens. As PA DEP ponders the complexities of SGI's mountaintop removal and the destruction of natural resources, we ask that our constitutional rights be given meaning: If these permits are approved, the destruction of our rural mountain environment and the airborne and downstream impacts will be disastrous for years to come. These disastrous impacts will be borne by the Toms Creek, Miney Branch, Monocacy, Potomac, and Chesapeake Bay watersheds and millions of people. It simply makes no sense that PA DEP would approve permits for destruction of 66 acres in view of the negative economic, environmental, and health impacts. SGI should not be permitted to trample on our constitutional rights.	32	Constitution	Please see response to comment 44 (Article I Sec 27) .
51	<i>The Department is Responsible for Protecting Citizens' Environmental Rights:</i> Finally, as indicated in FOIC's July 23, 2018 written comment, the Department has a constitutional responsibility to ensure that the peoples' right to clean air is not unreasonably degraded. Pa. Const. Art. I, § 27.	18	Constitution	Please see response to comment 44 (Article I Sec 27) .
52	At times, the Department may be required to go above and beyond statutory and regulatory requirements to ensure that unreasonable degradation does not occur. As noted in <i>Center for Coalfield Justice, et al. v. DEP, et al.</i> , treating the Article I, Section 27 Constitutional standard as coextensive with compliance with statutes and regulations was "clearly rejected" by the Pennsylvania Supreme Court in <i>Pennsylvania Environmental Defense Foundation</i> . 2017 Pa. Environ. LEXIS 52 at *62.	18	Constitution	Please see response to comment 44 (Article I Sec 27) .
53	Accordingly, an evaluation of anticipated degradation to air quality may include the consideration of air pollutants that are not specifically regulated, but may have an adverse impact on the people's right to clean air.	18	Constitution	Please see response to comment 44 (Article I Sec 27) .
54	In this case, naturally occurring asbestos is certainly one such pollutant that has the potential to unreasonably degrade air quality, resulting in severe health impacts for residents living, working or recreating within close proximity to the Northern Tract development.	18	Constitution	Please see response to comment 44 (Article I Sec 27) .
55	In order to fulfill obligations pursuant to Art. I, § 27 the Department must at a minimum evaluate the impacts from SGI's Northern Tract and make a determination about whether those impacts constitute an "unreasonable degradation, diminution, depletion or deterioration of the environment." <i>The Delaware Riverkeeper Network, et. al. v. Commonwealth of Pennsylvania Department of Environmental Protection, et. al.</i> , EHB Docket No. 2014-142-B, 2018 Pa. Environ. LEXIS 34* (Opinion Issued May 11, 2018) (articulating a two-step analysis for compliance with Article I, Section 27).	18	Constitution	Please see response to comment 44 (Article I Sec 27) .
56	In fact, the Department has an obligation as trustee under Section 27 to act with prudence, loyalty and impartiality. <i>Id</i> at *72.	18	Constitution	Please see response to comment 44 (Article I Sec 27) .
57	Therefore, in the context of asbestos emissions, this means the DEP must require adequate and appropriate soils analysis and air monitoring to evaluate environmental and health impacts.	18	Constitution	Please see response to comment 44 (Article I Sec 27) .
58	As discussed above, the Department has a constitutional responsibility to ensure that the people's right to clean air is not unreasonably degraded. Pa. Const. Art. I, § 27.	18, 45	Constitution	Please see response to comment 44 (Article I Sec 27) .
59	At times, the Department may be required to go above and beyond statutory and regulatory requirements to ensure that unreasonable degradation does not occur.	18, 45	Constitution	Please see response to comment 44 (Article I Sec 27) .

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
60	As noted in <i>Center for Coalfield Justice, et al. v. DEP, et al.</i> , treating the Article I, Section 27 Constitutional standard as coextensive with compliance with statutes and regulations was "clearly rejected" by the Pennsylvania Supreme Court in <i>Pennsylvania Environmental Defense Foundation, 2017 Pa. Envirn. LEXIS 52 at *62.</i>	18, 45	Constitution	Please see response to comment 44 (Article 1 Sec 27) .
61	Accordingly, an evaluation of anticipated degradation to air quality may include the consideration of air pollutants that are not specifically regulated, but may have an adverse impact the people's right to clean air.	18, 45	Constitution	Please see response to comment 44 (Article 1 Sec 27) .
62	The Department's thorough analysis of anticipated air quality impacts is particularly important in this Application, as SGI indicates in Module 17 that an Air Quality General Permit for Portable Nonmetallic Mineral Processing Plants is "not applicable."	18, 45	Constitution	Please see response to comment 44 (Article 1 Sec 27) .
63	SGI's failure to address NOA hinders the Department from fulfilling its responsibilities pursuant to the Environmental Rights Amendment. As a result, the Department must deny the Application, or, in the alternative, require release and exposure estimates of NOA to allow the Department to evaluate and quantify the anticipated impact upon ambient air quality.	18, 45	Constitution	Please see response to comment 44 (Article 1 Sec 27) .
64	Now we expect that our rights to clean air and clean water under the Pennsylvania Constitution will be protected by the Department of Environmental Protection.	38, 42, 53, 54, 55, 59, 65, 66, 67, 72, 77, 80, 83, 87	Constitution	Please see response to comment 44 (Article 1 Sec 27) .
65	The existence of asbestos at Charmian was documented in 1942 and was mined.	9	Geology	Neither the Department nor SGI has any knowledge of the alleged documented occurrence or mining of asbestos in the 1940s mentioned in this comment, nor did the commenter provide any documentation in support of the statement. Based upon DEP's knowledge of the geology of our site we find it highly improbable that an asbestos mine was located at the facility. As described in the SGI application materials and supporting materials, the occurrence of a mineral named actinolite in the metabasalt formation that is mined at the Charmian facility is rare but possible. This mineral occurs in small discretely located quantities. Actinolite rock can come in multiple forms, and at the mine the most common form is crystalline without friable fibers and therefore non-asbestiform. However, the potential for encountering actinolite asbestiform materials is possible and is why SGI undertakes substantial measures to avoid and contain any suspect minerals through implementation of its Mineral Identification and Management Guide. See generally SGI First Responses §7 and Appendices 7.1 and 7.2; SGI Second Responses §9; and SGI's Response to DEP's September 20, 2019 Technical Deficiency Letter.
66	SGI claims they have to mine the Pine Hill location because of the metabasalt existing in that location.	55	Geology	As described in the Social or Economic Justification ("SEJ") Supplement filed with SGI's application, and associated supporting materials, SGI is engaged in the production of roofing granules that require a source of highly durable metabasalt material. Such metabasalt materials are relatively rare in occurrence, and an ongoing source of metabasalt material is required as the resources of the existing Pitts Quarry are exhausted. The metabasalt formation that SGI is mining at this location continues onto the Northern Tract, and its location adjacent to the existing mining operations provides a logical extension for utilization of the same metabasalt sources. For additional details, see the Application's SEJ Supplement, the SGI Second Responses §§ 3.6(d), 3.11 and Appendix 3.4.
67	Greenstone metabasalt exists as a base layer under most of the Blue Ridge Mountains, but the belt they are mining is in the Catoctin Formation, the same formation which is known to contain Naturally Occurring Asbestos (NOA) and which Virginia has regulations which forbid disturbing it.	55	Geology	Virginia has no regulation forbidding disturbance of the Catoctin Formation or greenstone in any other rock formations. A search of Title 4 of Virginia's Administrative Code (the regulations regarding conservation and natural resources, where Virginia's mining regulations reside) returns no results for "asbestos," "greenstone," or "Catoctin."
68	Asbestos was mined in the 1940's right where the original "Grit Mill" existed.	55	Geology	Please see response to comment 65 (asbestos).
69	Attachment (v) item from Minerals of Pennsylvania, R. F. Stone: Concerning asbestos in South Mountain, Adams County, the best quality of asbestos obtained in the region came from a dike-like band of greenstone which crosses the Carroll Ridge a mile north of South Mountain Sanitarium, just west of the county line.	55	Geology	The Department has reviewed the PA Geologic Survey "Minerals of Pennsylvania" publication and acknowledges the reference regarding the presence of asbestos in Adams county.
70	Attachment (v) item from Minerals of Pennsylvania, R. F. Stone: This asbestos is cross fiber and fills small gash veins about one-half inch wide in the greenstone. Although the fiber is green and silky, it is so short and interlayered with quartz that it has no commercial value.	55	Geology	Please see response to comment 69 (asbestos).
71	Other specimens of silky asbestos were obtained from the Baker prospect shaft in the small greenstone area 2 by 2 miles southeast of the Sanitarium, at the western line of the county. Very thin veins of silky asbestos show in the Western Maryland Railroad cut near Charmian, in the southwest corner of the county. This has the appearance of a slip-fiber vein. Although the quality seems good the quantity at these places is very small and not of commercial value. R.W.Stone "Minerals of Pennsylvania"	55	Geology	Please see response to comment 69 (asbestos).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
72	I think the health issue is very real. This type of asbestos is the kind - this actinolite, it has almost a coat on the end of it, into your lungs, it's not getting out.	55	Geology	During SGI's geologic characterization activities for the proposed Northern Tract Quarry, 17 rock core holes were drilled throughout the proposed mining area. From these 17 cores, 40 samples were collected representing each rock core boring and each planned 50-foot mining interval throughout the proposed mining area, and analyzed for naturally occurring asbestos. The samples were analyzed in April 2017 using polarized light microscopy (PLM) method EPA/600/R-93/116, with a detection limit of 0.1%. The sample results were reported to the Department on November 12, 2018. Of the 40 samples, three detected the presence of actinolite, with a maximum concentration of 0.5%. Following a review of these results, the Department required, in a technical deficiency letter dated September 30, 2019, that the 40 samples be re-analyzed using transmission electron microscopy (TEM). SGI responded on October 15, 2019, proposing to re-analyze the 40 samples using a procedure based on the following: CARB 435, ASTM D5756, AHERA, EPA 600/R-93/116, and ISO 22262-2. This procedure was approved by the Department on December 4, 2019. The sample results were reported to the Department on January 17, 2020. Of the 40 samples, eight detected the presence of actinolite, with a maximum concentration of 6.2%. Additionally, the Department collected 5 samples from SGI's rock cores on December 19, 2019 in addition to 5 split samples collected the same day, which were sent to an independent laboratory for analysis via PLM and TEM. Of the 10 PLM results of the Department's samples, eight detected the presence of actinolite, with a maximum concentration of 5.25%. Of the 10 TEM results of the Department's samples, eight detected the presence of actinolite, with a maximum concentration of 13.0%. The permit will include a monitoring plan for asbestos that includes regular perimeter monitoring and periodic activity based and source material monitoring to ensure that asbestos does not leave the permit area in harmful concentrations. The activity based monitoring will include the monitoring of truck traffic within the permit area.
73	SGI claims that Actinolite is "rare" in the Catocin formation it mines. However, SGI has provided no definition of what it means by "rare," or quantification of why this is relevant to public health and worker safety concerns. My understanding is that Actinolite "blooms" and large "veins" can be identified reasonably easily, but that there are also small deposits throughout the rock.	14	Geology	Please see response to comment 65 (asbestos) above. The commenter's characterization of blooms and large veins of actinolite in the area are incorrect; in fact, the rare occurrence of actinolite in the metabasalt formations on the Charmian property appear in small, isolated deposits that are visible to the naked eye. Sampling taken from rock cores drilled in the Northern Tract area found only 3 of 40 samples that contained any actinolite, and those samples contained only very small (0.2 to 0.5% of the sample) quantities of actinolite. The relative rarity of actinolite is relevant from several perspectives. Such rarity means that there is a low probability to encountering actinolite, and moreover most of that actinolite is crystalline, not asbestiform. Even though actinolite is rare, SGI has adopted and implemented the Suspect Minerals Identification and Management Protocol (Appendix 7.1 to SGI First Responses) to provide for identification, segregation and avoidance of materials that might potentially contain actinolite. The results of ambient air quality testing and hundreds of industrial hygiene tests submitted to DEP show no threat to public or worker health. For additional information, see SGI First Responses §7 and Appendices 7.1, 7.2, 7.3; and SGI's Response to DEP's September 20, 2019 Technical Deficiency Letter.
74	Greenstone, which is made up of chlorite, various green amphiboles, and actinolite, is being processed near our neighborhoods, transported through our neighborhoods, and used by manufacturers in our roofing shingles. According to the Mesothelioma Center website, actinolite in its fibrous form, the form found most prevalently in the Appalachian Mountains, is asbestos. These asbestos fibers, which are carried by wind and water, can present a hazard within the vicinity of greenstone mining. So we must ask -- are truck surfaces spreading these fibers through our residential streets?	32	Geology	Please see response to comment 72 (asbestos). The permit will include an asbestos monitoring plan for truck traffic that includes periodic activity-based air monitoring along the quarry roads that receive truck traffic. In addition, all loads are adequately wetted before and during truck loading operations, trucks transporting materials off-site are adequately wetted and covered with tarps, vehicle speed within the quarry or surface mining operations will be limited to thirty (30) miles per hour or less on haul roads or stockpile areas, and twenty (20) miles per hour or less on roads in other areas of the site, the permittee will be required to install a gravel pad, grizzly rumble grate, tire washing system, or paving at least fifty (50) feet from any public road access point, and clean any visible track-out off the paved public road using wet sweeping or a HEPA filter equipped vacuum device at the end of each workday.
75	NOA occurs in "[m]etamorphosed mafic extrusive rocks, especially metabasalt (greenstone) ..." and is "linked to a number of serious respiratory diseases and health problems ... such as asbestosis (scarring of the lungs), lung cancer, and malignant mesothelioma." Bradley S. Van Gosen, <i>The Geology of Asbestos in the United States and Its Practical Applications</i> , Environmental & Engineering Geoscience, Vol. XIII, No. 1 (Feb. 2007) at 56, 57 (emphasis added).	18, 45	Geology	Please see response to comment 72 (asbestos).
76	SGI claims they have to mine the Pine Hill location because of the metabasalt existing in that location. Greenstone metabasalt exists as a base layer under most of the Blue Ridge Mountains, but the belt they are mining is in the Catocin Formation, the same formation which is known to contain Naturally Occurring Asbestos and which Virginia has regulations which forbid disturbing it. Next they will insist they have to follow the metabasalt into the Michaux State Forest. Will DEP allow that expansion? Where does it stop? Where do environmental issues, health, and quality of life for the local community get to say stop against such greed?	55	Geology	Please see responses to comments 4 (expansion) and 67 (asbestos).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
77	<p>A number of questions were raised in testimony at the meeting about the concerns for the giant pit that will be part of the new operations - and the subsequent effect on the water level of the surrounding territory. Any geologist would tell you of the tortured substructure of the rocks in this area due to the past history of movement of the crust that formed our mountain. Certainly, SGI has abundant information concerning the substructure of the rocks in this area. If you were really doing your job why were there no geological maps and testimony submitted addressing these concerns?</p>	8	Geology	<p>SGI has provided geologic logs for seventeen (17) drill holes and ten (10) monitoring wells that were used to characterize the local geologic structure of the proposed Northern Tract Quarry. Geologic cross-sections (A-A' and B-B') can be found on Exhibit 7.1 (Geologic Cross-Sections) prepared using both drill hole and monitoring well geologic logs. A discussion of the local geologic structure and geologic logs can be found in Module 7 of the proposed Northern Tract Quarry permit application. The proposed Northern Tract Quarry application includes a numeric groundwater model report developed using a network of nineteen (19) monitoring wells, surface water features (i.e. streams, seeps, springs, and wetlands) and aquifer testing results to predict the groundwater gradient for each level of mining. The results of the numeric groundwater model report simulated the proposed Northern Tract Quarry drawdown for each level of mining. The simulated 12th level drawdown map (Figure 32 of the Groundwater Model Report) shows a 10 foot drawdown that is confined by the Unnamed Tributary to Toms Creek and Toms Creek. All of the private water supply wells and springs (with the exception of 15A16) within 1,000 feet of the permit boundary and inventoried for the proposed Northern Tract Quarry are located on the opposite side of Unnamed Tributary to Toms Creek and Toms Creek, with respect to the Northern Tract Quarry. 15A16 is currently owned by SGI and has been incorporated into the monitoring program as a groundwater monitoring well. As indicated by the simulated 12th level drawdown map, drawdown is not anticipated to occur beyond the confines of Unnamed Tributary to Toms Creek and Toms Creek. In addition to simulating the predicted drawdown for each level of mining, the groundwater model report also simulates the reclamation potentiometric groundwater elevations contour map. Figure 33 Simulated Reclamation Potentiometric Groundwater Elevation Contour Map of the Groundwater Model Report indicates that the potentiometric groundwater elevations in the areas where the private water supplies lie will remain at the pre-mining elevations shown on Figure 13: Simulated Existing Site Conditions Potentiometric Groundwater Elevation Contour Map. The groundwater modeling is supported by the groundwater modeling conducted for the Pitts Quarry operation that indicate relatively no change in the surrounding groundwater quality and quantity. A cross section showing the estimated post-mining water elevation can be found on Exhibit 10.5 (Reclamation Cross Sections).</p>
78	<p>At the recent meeting there was some concern about runoff over flowing from the holding ponds into Tom's Creek, and I believe that's the biggest concern the community has concerning this permit request. It's a valid concern but I believe it's a problem that can be resolved. I've worked at Flowserve Pump Company for 35 Years, 20 in the weld shop and 15 in the office as an application engineer, helping customers with selections, pricing and delivery, of vertical pumps.</p> <p>PA DEP has a requirement that the pumping systems must be capable of pumping the holding ponds dry in 7 days. I'd like to suggest each pond should have 2 pumps with enough combine pumping capacity to pump each pond in 60 hours, the intent is to have the capacity should we ever need to use it. We can avoid the risk of discharge into Toms Creek, if we should receive additional heavy rain during the 7 day period, NT1 its full storage capacity is 4,018,228 million gallons % by 60 hours = 66,970 per hour % by 60 minutes = 1,116 gpm., NT2 its full storage capacity is 6,810,018 million gallons % 60 hours = 113,250 per hour % by 60 minutes = 1,891 gpm.</p> <p>I'd also suggest we should have a spare bowl assembly for each pump.</p> <p>I believe SGI has done a great job presenting the facts and as long as they're willing to address the problem of pumping capacity, then there's no reason why they shouldn't be issued the permit.</p>	19	Surface Water Quality	<p>The proposed Northern Tract Quarry application includes ponds designed to retain the stormwater from a 100 year/24 hour storm, which is significantly larger than what is required. This interpretation comes from EHB Docket nos. 2002-131-C (Zlomsowich & East Penn Concerned Citizens v. Department & Lehigh Asphalt Paving & Construction Company), 2007-287-L (Crum Creek Neighbors v. Department & Pulte Homes of PA), & 2005-077-K (Blue Mountain Preservation Association, Inc. v. Department & Alpine Rose Resorts, Inc.). Also, the Department's Erosion and Sediment Pollution Control Program Manual (Technical Guidance Document No. 363-2134-008, March 2012), incorporated by reference in 77 PA Code Chapter 102, requires a minimum sedimentation pond design capable of retaining the runoff from a 10 year/24 hour storm. SGI chose to design the sedimentation ponds for the Northern Tract Quarry with a capacity based on the 100 year/24 hour storm, which is greater than the required pond design capacity.</p>
79	<p>The historic operations there are not only the best source of evidence for anticipated impacts related to the Northern Tract Expansion, but also serve as an important source of data that can be used to ensure SGI's mine expansion will not result in degradation of Tom's Creek. The SGI Pitts Quarry is an active mine site adjacent to the proposed Northern Tract Expansion.</p> <p>As indicated in the Princeton Hydro Report, SGI's own application notes that aluminum, nitrogen and iron were found in the stormwater runoff at the active Pitts Quarry and could likely end up in Tom's Creek if the Northern Tract is disturbed for expansion.</p>	32	Runoff	<p>The proposed Northern Tract Quarry application Module 2 Section D. Effluent Characterization-28. Conventional and Nonconventional Pollutants does note that aluminum, nitrogen, and iron have been detected in at least one sample of stormwater runoff at the adjacent Pitts Quarry at low concentrations (in naturally occurring ranges). A review of the sample results from a stormwater sample collected on February 7, 2014 show that the aluminum concentrations at 0.28 milligrams per liter (mg/L), nitrogen (total organic) at 2.2 mg/L and iron at 0.34 mg/L. Discharges causing pollution are not anticipated from the proposed Northern Tract Quarry operation since the only discharges expected would occur during precipitation events greater than a 100 yr./24 hr. storm event. Pitts Quarry NPDES permit No. PA0223239 has been conditioned that the permittee must sample the upstream and downstream monitoring points on Toms Creek or Unnamed Tributary to Toms Creek during a precipitation event which exceeds the 100-year/24hr. storm event or any precipitation event the emergency spillway outfalls 001 and 002 appears possible to discharge. The permittee shall not cause or contribute to degradation of Toms Creek or Unnamed Tributary to Toms Creek in the event of a discharge from the emergency spillway outfalls 001 and 002. The Northern Tract NPDES permit No. PA0279617 will contain similar conditions as the Pitts Quarry NPDES permit.</p>
80	<p>Though it appears that the pollutant load decreases as the landscape changes due to mine expansion, the underlying cause of load reduction is the issue for concern. There is less nutrient loading not because the amount of pollutant decreases, but because the water that conveys the pollutants is being diverted along the landscape differently.</p> <p>Tom's Creek itself is receiving less water from runoff, which is an indication of a drastic overall hydrology change to the watershed. If the flow of Tom's Creek is jeopardized by diverting the water the creek would normally receive to retention ponds, then the habitat that supports migratory fish and other undocumented aquatic life will suffer due to lack of habitat.</p>	32	Surface Water Quality	<p>The proposed Northern Tract Quarry application includes a numeric groundwater model report developed using a network of nineteen (19) monitoring wells, surface water features (i.e. streams, seeps, springs, and wetlands) and aquifer testing results to predict the groundwater gradient for each level of mining. The results of the numeric groundwater model report simulated a quarry pit discharge (12th level) of 9.0 gallons per minute (gpm). The drawdown influence from groundwater pumping at the 12th level of mining show a 10 foot drawdown that is confined by the Unnamed Tributary to Toms Creek and Toms Creek. In order to evaluate the predicted base flow stream and wetland loss, the model was simulated to calculate the predicted base flow stream and wetland loss at each level of mining (Table 9: Base Flow Stream and Wetland Loss Volumes of the Groundwater Model Report). A review of the simulated base flow loss at Stream Reach A, B, and C show at full quarry development (12th level) a total base flow loss of 20 percent (2.6 gpm) for Stream Reach A, 80 percent (2.5 gpm) for Stream Reach B and a 23 percent (3.7 gpm) base flow loss for Stream Reach C. Toms Creek is represented by Stream Reach A, B, and C, therefore, the total base flow loss of 8.8 gpm is simulated from Toms Creek, which represents 27 percent of the total base flow (32 gpm) contributed at Stream Reach A, B, and C to Toms Creek.</p>

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
				<p>In order to evaluate the total flow loss of Toms Creek (both surface and base flow) an evaluation of the overall drainage area was considered. The total contributory drainage area for Toms Creek upstream of the Northern Tract Quarry is 4.83 square miles (sq./mi) and the drainage area of the Northern Tract Quarry (85 acres) is 0.13 sq./mi. The amount of surface drainage loss to Toms Creek would be 2 percent of the total drainage area to Toms Creek. The lowest stream flow from background flow measurements collected from the downstream monitoring point on Toms Creek (SS-TC-DS) is 278 gpm. The lowest stream flow of background flow measurements collected from the downstream monitoring point on the Unnamed Tributary to Toms Creek (SS-CHN1-DS) is 65 gpm. Therefore, the lowest total stream flow of background flow measurements of Toms Creek (including flow from SS-CHN1-DS) is 343 gpm. Using the percent of drainage area loss (2 percent) due to the development of the Northern Tract Quarry, the total surface flow loss would be 7 gpm. Therefore, the combined flow loss of surface and base flow would be 16 gpm or 5 percent of the lowest background stream flow of Toms Creek. Both the stormwater and groundwater pumped from the Pitts Quarry and Northern Tract Quarry will be pumped to the adjacent Charmian Plant and discharged at outfall 001 to Miney Branch under the NPDES permit No. PA0009059. Miney Branch drains to the confluence with Toms Creek approximately 5.5 miles downstream of the Northern Tract Quarry, at which point the water pumped from the quarry operations will return to Toms Creek. Although the proposed Northern Tract Quarry will alter the hydrology locally with respect to the quarry operations, the predicted total flow loss to Toms Creek during low flow conditions is projected to be 5 percent, preserving the designated use of High Quality and flow of Toms Creek.</p> <p>A condition has been added to the permit that utilizes the perimeter monitoring wells in conjunction with the upstream and downstream monitoring points for Toms Creek and Unnamed Tributary to Toms Creek. The purpose of the condition is to monitor the perimeter monitoring wells, utilizing the predicted potentiometric groundwater elevations represented in Figures 15 through 23 of the Groundwater Model Report for each level of mining for comparison, as well as weekly stream monitoring during August and September, and annual macroinvertebrate surveys during August and September to ensure Toms Creek and UNT to Toms Creek are protected from impact during the most vulnerable stream flow conditions. If an impact is observed, the permittee will be required to remediate the impact.</p>
81	<p>The Capacity of SGI's Discharge Basins is Inadequate to Ensure Protection of Tom's Creek Under SGI's proposal, once the Northern Tract development is complete, stormwater runoff will drain into Pitts Quarry and to the existing sedimentation pond prior to discharge.</p> <p>Generally, that sediment pond involves a passive discharge as water reaches appropriate levels. It is clear that SGI already has to drain the pond by way of pump just before a rain event is predicted. Since the sediment pond is normally a passive discharge and pumping is required, this clearly suggests that the ponds are under capacity and are not effective at removing solids.</p> <p>If SGI's proposal is approved, however, they will be adding increased additional storm water from the expansion and there will be more active pumping discharges. Based on Princeton Hydro's review of the sedimentation pond capacity, this additional active pumping would prevent solids from adequately settling out and lead to additional unanticipated discharges to Tom's Creek, further impacting water quality.</p>	32	Surface Water Quality	<p>The Northern Tract Ponds are designed to detain the runoff from a 100-year, 24-hour storm event without discharging. Therefore, the Northern Tract Ponds will have an excess available storage volume. Thus, after a storm event, the accumulated water in the Northern Tract Ponds could be allowed to remain in the pond for two to five days. Then, the Northern Tract Ponds could be dewatered in the following two to five days (within seven days total), depending on the chosen pump capacities. This will allow for a staged dewatering process at the Lower Mill Pond System. Therefore, the discharge rate at the Lower Mill Ponds outfall will be unchanged considering the addition of the pumped water from the Northern Tract Ponds. Finally, once the Northern Tract Quarry is developed such that it will detain water in the bottom of the pit, the ability to complete a staged dewatering process will be improved since the water can be detained in the quarry pit for an even longer duration. Also in the early development stages of the proposed Northern Tract Quarry any excess water in the proposed Northern Tract Quarry ponds can be directed to the Pitts Quarry pit to increase stormwater storage until the water can be directed to the Lower Mill Ponds.</p>
82	<p>SGI's Module 24, which describes its Social and Economic Justification for potentially degrading discharges to Tom's Creek, is misleading and inaccurate because it fails to account for the many significant social and economic benefits that Tom's Creek provides to the community and that would be harmed if Tom's Creek is degraded.</p> <p>For proposed discharges to special protection waters, if an applicant determines there are no cost-effective and environmentally sound nondischarge alternatives, the discharge must either result in non-degradation or the applicant must demonstrate that the proposed degradation is socially or economically justified. 25 Pa. Code §§ 93.4c(b)(1)(i)(B); 93.4c(b)(1).</p> <p>The code clearly only permits a reduction of water quality upon social and economic justification for HQ waters, whereas EV waters may not be degraded. See § 93.4c(b)(iii). Based on sampling conducted by FOTC and others, Tom's Creek clearly qualifies as an EV water and may not be degraded.</p>	32	Surface Water Quality	<p>Please see response to comment 38 (Anti-Degradation Supplement). Toms Creek has a designated use of High Quality - Cold Water Fishes, meaning that the Social or Economic Justification process described in § 93.4c(b)(iii) is applicable.</p>

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
83	SGI has failed to "affirmatively demonstrate * * * that there is no presumptive evidence of potential pollution of the waters of this Commonwealth." 25 Pa. Code § 77.126(a)(3) These words have clear meaning. There is an abundance of "presumptive evidence" of not just "potential pollution," but actual pollution. Properties along Miney Branch Creek - the discharge point of waters from current SGI operations and the proposed discharge point of waters pumped from Pine Hill - are clogged with green grit. It is confirmed that at one location along Miney Branch Creek the green grit is 3 feet deep! Multiple citizens have produced photographs of thick green grit in their yards. It doesn't take a scientist to prove that the source of this grit is from SGI operations. The green goop is a pollutant that has destroyed the health of Miney Branch Creek and is threatening the health of residents, their children, their pets, and wildlife.	32	Surface Water Quality	The Pennsylvania Fish & Boat Commission completed an aquatic biology investigation of Miney Branch on October 15, 2019. Four benthic macroinvertebrate sample sites were chosen for the investigation, based on their proximity to the location of SGI's discharge as well as previous sample locations for a similar investigation conducted in 1995. While results for the 2019 investigation were similar to that of the 1995 investigation, it was noted that water quality in the Unnamed Tributary to Miney Branch has likely improved since 1995. Additionally, no observations of obvious siltation problems associated with SGI's discharge were noted at any of the sampling locations. The investigation concluded that an approximate 200 yard reach between SGI's discharge and the mouth of the Unnamed Tributary to Miney Branch should be considered impaired for aquatic life use. However, this conclusion is qualified in that the timing of the investigation may have played a role in the results since benthic macroinvertebrates are best sampled during spring timeframes. Recommendations of the investigation are to conduct a similar investigation during more favorable conditions to confirm the results. Due to restrictions related to the COVID-19 pandemic a stream assessment was not possible in 2020. An assessment will be completed in 2021 to confirm the results of the 2019 assessment. Any recommended actions will be taken at the Charmian Plant (NPDES permit no. PA0009059) discharge (001).
84	SGI urges approval of its permit application by arguing it is not degrading high quality waters: yet, Miney Branch Creek is proven degradation. SGI urges that even if there is degradation of high quality waters there are social and economic justifications for degrading these resources: yet, consider the overwhelming burdens citizens are bearing. Please address plummeting real estate values, destroyed view sheds, toxic dust, dangerous traffic, lost flora and fauna, threatened wildlife, nuisance noise, lost history, lost sustainable economic opportunities, and the potential of lost lives caused by disturbance of naturally occurring asbestos.	32	Surface Water Quality	Please see responses to comments 35 (historic), 38 (Anti-Degradation Supplement), 72 (asbestos), 83 (stream testing), 154 (stream survey), 184 (nuisance), 214 (property value), 239 (asbestos), and 276 (natural diversity).
85	SGI's answers to the ANTIDegradation and the SOCIAL AND ECONOMIC JUSTIFICATION sections are stunningly inadequate recompense for: The pollution of an HQ stream with sediment which will carry some percentage of toxic asbestos and change the stream's bottom contours by filling it up with silt (this is what has happened to Miney Branch)	55	Surface Water Quality	Please see responses to comments 38 (Anti-Degradation Supplement), 72 (asbestos), and 83 (stream testing).
86	SGI's answers to the ANTIDegradation and the SOCIAL AND ECONOMIC JUSTIFICATION sections are stunningly inadequate recompense for: The re-contouring of part of a PROTECTED WATERSHED (reversing the present downhill shape)	55	Surface Water Quality	Please see response to comment 38 (Anti-Degradation Supplement).
87	SGI's answers to the ANTIDegradation and the SOCIAL AND ECONOMIC JUSTIFICATION sections are stunningly inadequate recompense for: The harm to the health of one of only three birthplaces (headwaters) for the Potomac River. "Health" is meant here not as a few chemical tests but the whole ecology of a stream as determined by macroinvertebrate indicators of healthy conditions.	55	Surface Water Quality	Please see response to comment 38 (Anti-Degradation Supplement).
88	SGI's answers to the ANTIDegradation and the SOCIAL AND ECONOMIC JUSTIFICATION sections are stunningly inadequate recompense for: the probable serious harm during drought months of several wetlands (two of which are nationally protected) if water volume of the west and east tributaries are impacted.	55	Surface Water Quality	Please see responses to comments 38 (Anti-Degradation Supplement) and 100 (wetlands).
89	SGI's answers to the ANTIDegradation and the SOCIAL AND ECONOMIC JUSTIFICATION sections are stunningly inadequate recompense for: the compromise of health of the HQ segment during summer months which carries a low volume of water under normal circumstances. Restricting normal rain water runoff to this section would lower the volume of the stream and increase the temperature.	55	Surface Water Quality	Please see response to comments 38 (Anti-Degradation Supplement) and 80 (stream impacts).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
90	The proposed site of this new quarry has to be the poster child of where NOT to put a quarry. Would PADEP even consider this application if it were not for the existing quarry behind it? The tract is surrounded on three sides by HQ tributaries and stream, wetlands exist on both sides, and it is situated within a residential area, across from a State Forest. The only antidegradation option which prevents damage to an iconic stream (Toms Creek is well known and loved because of its trout fishing and its long stretch down through to Lake May and the Carroll Valley Community Park), is the first: moving the site to a different location. I was mistaken in my estimate of how much land SGI currently owns. It is not 1400 acres, but there is plenty of room within its current boundaries, and ISP/SGI has deed recorded options to mine on adjacent properties. SGI even admits that if it were to move some of its infrastructure that it could expand into those areas. And SGI has deed recorded mining rights to an 130 acres parcel owned by Elizabeth Chase, continuous with the Pitts quarry. (See Appendix A.)	55	Surface Water Quality	Please see response to comment 38 (Anti-Degradation Supplement). SGI does not own deeded mining rights to the Chase Properties. In 1990, SGI entered into a private lease agreement that allows the surface use of approximately 2 acres of the 87-acre parcel (Parcel ID: 18A17-0017) on the eastern side of the railroad right of way. This parcel is adjacent to the coloring plant, not the Pitts Quarry. Currently, only a portion of this 2-acre area is used for mining support activities. The lease does not allow SGI to conduct extraction on this 2-acre area or the rest of the 87-acre property.
91	Technically it may be possible to trace the watershed boundaries for the HQ portion of Toms Creek from its origin to the bridge at Iron Springs such that somehow it comes up with 3,000 acres because Toms Creek starts so high up in the mountains. However the volume of water produced from at least the first two thirds of Toms Creek from that elevation cannot support anything except macroinvertebrates. To use this large acreage of an exaggerated watershed for comparison of impact to the 85 quarry acres is invalid.	55	Surface Water Quality	Please see response to comment 80 (stream impacts).
92	A very important flaw of SGI's hydrology analysis was lack of any measurement of stream volume (from what I understand this requires more detail measurement than just flow.) It makes no sense to draw the conclusion that because Pine Hill/Northern Tract has limited acreage and that the watershed has much more acreage that somehow it means any pollution will have a small effect! The watershed could cover a county but if the resulting volume of water within the HQ portion is small, then any amount of pollution will damage it.	55	Surface Water Quality	Please see response to comment 80 (stream impacts).
93	The SGI application spends a lot of time on the analysis of excess rainfall/stormwater but lacks analysis of low rainfall and drought conditions on stream health and wetland survival. Given that the diversion of natural rainfall will deny the tributaries and wetlands on the west and east side of the NT of their normal water, the proposal will greatly impact the temperature of tributary and wetland water during the summer months. The steepness of the mountain (up to 70 degrees) and the low permeability of the soils means much more water is contributed to the watershed than can be judged by the flat acreage of 85 acres.	55	Surface Water Quality	<p>Please see responses to comments 38 (Anti-Degradation Supplement) and 80 (stream impacts). The proposed Northern Tract Quarry application includes a numeric groundwater model report developed using a network of nineteen (19) monitoring wells, surface water features (i.e. streams, seeps, springs, and wetlands) and aquifer testing results to predict the groundwater gradient for each level of mining. The results of the numeric groundwater model report simulated a quarry pit discharge (12th level) of 9.0 gallons per minute (gpm). The drawdown influence from groundwater pumping at the 12th level of mining show a 10 foot drawdown that is confined by the Unnamed Tributary to Toms Creek and Toms Creek. In order to evaluate the predicted base flow stream and wetland loss, the model was simulated to calculate the predicted base flow stream and wetland loss at each level of mining (Table 9: Base Flow Stream and Wetland Loss Volumes of the Groundwater Model Report). A review of the simulated base flow loss at Stream Reach A, B, and C show at full quarry development (12th level) a total base flow loss of 20 percent (2.6 gpm) for Stream Reach A, 80 percent (2.5 gpm) for Stream Reach B and a 23 percent (3.7 gpm) base flow loss for Stream Reach C. Toms Creek is represented by Stream Reach A, B, and C, therefore, the total base flow loss of 8.8 gpm is simulated from Toms Creek, which represents 27 percent of the total base flow (32 gpm) contributed at Stream Reach A, B, and C to Toms Creek.</p> <p>In order to evaluate the total flow loss of Toms Creek (both surface and base flow) an evaluation of the overall drainage area was considered. The total contributory drainage area for Toms Creek upstream of the Northern Tract Quarry is 4.83 square miles (sq./mi) and the drainage area of the Northern Tract Quarry (85 acres) is 0.13 sq./mi. The amount of surface drainage loss to Toms Creek would be 2 percent of the total drainage area to Toms Creek. The lowest stream flow from background flow measurements collected from the downstream monitoring point on Toms Creek (SS-TC-DS) is 278 gpm. The lowest stream flow of background flow measurements collected from the downstream monitoring point on the Unnamed Tributary to Toms Creek (SS-CHN1-DS) is 65 gpm. Therefore, the lowest total flow of Toms Creek (including flow from SS-CHN1-DS) is 343 gpm. Using the percent of drainage area loss (2 percent) due to the development of the Northern Tract Quarry, the total surface flow loss would be 7 gpm. Therefore, the combined flow loss of surface and base flow would be 16 gpm or 5 percent of the lowest background stream flow of Toms Creek. Both the stormwater and groundwater pumped from the Pitts Quarry and Northern Tract Quarry will be pumped to the adjacent Charmian Plant and discharged at outfall 001 to Miney Branch under the NPDES permit No. PA0009059. Miney Branch drains to the confluence with Toms Creek approximately 5.5 miles downstream of the Northern Tract Quarry, at which point the water pumped from the quarry operations will return to Toms Creek. Although the proposed Northern Tract Quarry will alter the hydrology locally with respect to the quarry operations, the predicted total flow loss to Toms Creek during low flow conditions is projected to be 5 percent, preserving the designated use of High Quality and flow of Toms Creek.</p> <p>A review of the stream monitoring data for Toms Creek for the active Pitts Quarry for temperature shows that the upstream monitoring point SS-9 show a range from 6.3 to 18.8 ° C and the downstream monitoring point SS-4 show a range from 6.7 to 18.7 ° C in 2019. The temperature range varies with seasonal conditions with the highest temperatures recorded during sampling events in September of 2019. The monitoring data for the Unnamed Tributary to Toms Creek at upstream monitoring point SS-1 show a temperature range from 6.6 to 18.6 ° C and the downstream monitoring point SS-3 show a range from 4.8 to 18.2 ° C in 2019. The temperature range varies with seasonal conditions with the highest temperatures recorded during sampling events in September of 2019. The background monitoring data for the Northern Tract Quarry for Toms Creek also show a seasonal range in temperature at the SS-TC-US from 3.6 to 22.3° C and at SS-TC-DS from 2.3 to 21.6 ° C. Temperature will continue to be monitored at each surface water monitoring point during operations. In efforts to minimize any thermal impacts to Toms Creek or Unnamed Tributary to Toms Creek SGI will maintain a 300 feet vegetated riparian buffer along Toms Creek and the Unnamed Tributary to Toms Creek. In addition, SGI will also pump water from the Northern Tract Quarry sedimentation ponds NT-Pond 1 and NT-Pond 2 to the Lower Mill Pond System to avoid discharges to Toms Creek and the Unnamed Tributary to Toms Creek.</p>

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
94	If PADEP were to approve this permit application which includes discharge to an HQ rated stream without an adequate Social and Economic Justification (in fact it is socially and economically harmful), it would be undermining the whole PA State system of stream classification. It would make the HQ classification meaningless if companies can discharge without any compensating benefit to the community.	55	Surface Water Quality	Please see response to comment 38 (Anti-Degradation Supplement).
95	SGI states in its handout to the January meeting "Frequently Asked Questions about the Proposed Northern Tract Quarry" that it will protect water quality in Miney Branch. Based on testimony and photographs at the hearing, water quality in Miney Branch is already very poor, thanks to past and existing SGI operations. We gather SGI does not intend to make a bad situation worse. This is not a reason to approve the NT Quarry.	27, 28	Surface Water Quality	Please see response to comment 83 (stream testing).
96	SGI states that its plans will protect Tom's Creek "under normal operating conditions." However, as shown by the last year extreme weather seems to be on the increase. If its application is approved, it should require that SGI not increase either storm water runoff or suspended solids in Toms Creek under any circumstances. (Is this something that gets re evaluated at different lifts?)	27, 28	Surface Water Quality	The sedimentation pond for the proposed Northern Tract Quarry is based on a 100 year/24 hour storm amount of 8.03 inches. This storm volume is consistent with the National Oceanographic and Atmospheric Administration (NOAA) Hydrometeorological Design Studies Center Precipitation Frequency Data Server, which indicates a rainfall amount of 7.92 inches to 8.03 inches as being representative of the 100 year/24 hour storm in the vicinity of the proposed Northern Tract Quarry. This NOAA database includes recent rainfall data and would reflect any changing patterns in precipitation.
97	SGI is not testing the health of the streams. The goal we all share is keeping our streams and rivers clear and in good health. Apparently neither DEP nor DCNR are measuring the health of Toms Creek either! On July 20, 2011 (more than 7 years ago) DCNR assured the Adams County Commissioners that "ISP shall take the necessary efforts to maintain the quality rating of Tom's Creek and tributaries, based upon the PA DEP rating scheme, as it relates to ISP's operations. ISP will periodically monitor the streams so as to take appropriate action to maintain that standard." To date, no one, not SGI, not DEP, not DCNR, has done any periodic testing that directly measure these streams health using well-accepted measures of health (e.g. macroinvertebrate counts). Why not? You've had more than 7 years! Occasionally sampling the water and testing for a limited number of pollutants is not a reliable measure of the health of these waters. There are enormous weaknesses in this sort of chemical sampling, a fact extensively documented in Chapter 3 of PA DEP's own book: Office of Water Programs Bureau of Clean Water Assessment Methodology for Rivers and Streams 2018. These weaknesses are strikingly similar to the weaknesses demonstrated by RJ Lee's air quality testing in August of 2018. The basic flaw is sampling miniscule percentages of the water (or air) of interest. A further flaw is that SGI controls when pollutants might be released and also controls when and how sampling is done-an obvious conflict of interest that would not pass any ethical scrutiny. Why is this poor quality of testing apparently the only kind being discussed as a requirement for the permit?	14	Surface Water Quality	Surveys of Toms Creek were conducted in 2011 and 2014, both indicating that the existing use of High Quality – Cold Water Fishes is appropriate. The collection of data by the applicant in the permit application process is a necessary part of the applicant's site characterization. The data is collected by licensed professionals who attest to the proper collection of the data by signing and stamping the application submission. The Department does collect its own data in an effort to verify the data collected by the applicant, not to conduct our own site characterization. The vast majority of comments the Department has received regarding the water quality of Toms Creek contend that the water quality is better than the current designated use, not that the stream is being degraded. This is an indication that SGI is not causing stream degradation.
98	I can't find any plans that SGI has proposed to directly measure the health of the streams, which would include periodic macroinvertebrate counts at several locations. How is this consistent with the explicit commitment made in the letter to the Adams County Commissioners to maintain the quality rating of Toms Creek?	14	Surface Water Quality	Please see response to comment 97 (stream survey).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
99	No permit should be granted that doesn't include substantial penalties for harm to Tom's Creek and the surrounding watershed. What guarantees does the public have that SGI will adhere to its commitment to protect the water quality rating of Tom's Creek? Without hard guarantees, the SEJ is irreparably flawed, because irreparable harm could be done to the existing, longstanding, recreational uses of the watershed.	14	Surface Water Quality	<p>DEP is required by law to review mining applications such as SGI's in accordance with established laws and regulations. DEP takes seriously its obligations to do this.</p> <p>25 Pa. Code §77.130 requires the following: "A permit issued by the Department will ensure and contain specific conditions requiring that the permittee: ... (2) Dispose of solids, sludges, filter backwash or pollutants removed in the course of treatment or control of waters or emissions to the air in the manner which prevents violation of an applicable State or Federal law. The permittee shall conduct the activities in accordance with measures specified in the permit that are necessary to prevent environmental harm or harm to the health or safety of the public."</p> <p>Should the Northern Tract Quarry permit be issued, the permittee will be required to operate according to all necessary protocols, acts, laws and regulations required for the SGI permit. Noncompliance with these regulations will result in enforcement action which may include penalties, orders, or cessation of operations.</p>
100	The High Quality Cold Water Fisheries (HQ CWF) portion of Tom's Creek flows past the northwestern and northern edges of the Northern Tract. This small stream is surrounded by wetland as it is in a flat plain sided by steep hills with mostly impervious soil (see Module 8). As several studies have extensively documented in module 8, Tom's Creek watershed gets little groundwater and is highly dependent for its health on rain water runoff. SGI is proposing to destroy the steep slopes to the south and southeast of Tom's Creek, which will drastically reduce the runoff that feeds the wetland and creek itself.	14	Surface Water Quality	<p>Please see response to comment 80 (stream impacts).</p> <p>There are several wetland areas labeled A thru E along the Unnamed Tributary to Tom's Creek on the southeastern portion of the permit. A certified botanist will conduct a comprehensive vegetation survey of Wetland D to document current baseline conditions. The wetlands will be monitored yearly during mining. A mitigation strategy will be developed in coordination with the Department should impacts be realized. Presently this wetland will be the most likely of the wetlands to be impacted. If Wetland D is impacted, then the adjacent wetlands will be monitored during mining as well. The hydrologic sources to these wetlands are primarily associated with the surface water and seasonal groundwater interflow contributed from the Unnamed Tributary to Toms Creek. Wetland D, indirect impacts to the hillside groundwater seepage hydrology and may be impacted by mining. The groundwater model simulations suggest that impacts related to diminished baseflow (bedrock groundwater recharge) to existing wetlands and the Unnamed Tributary to Tom's Creek corridor as a result of lowering the potentiometric surface will be negligible during the development of the Northern Tract Quarry.</p>
101	Why would SGI ever have to dump into Toms Creek? Why not get a big enough pump, or pumps, to make sure it never has to do this? Engineers tell me these pumps are common.	14	Surface Water Quality	<p>SGI is required to account for any possible precipitation event. No matter how large a pond is built, or how much pump capacity is utilized, any NPDES permit issued to SGI for the proposed Northern Tract Quarry must account for the possibility of a precipitation event larger than what the ponds and pumps are designed for. The proposed Northern Tract Quarry application includes ponds designed to retain the stormwater from a 100 year/24 hour storm, which is significantly larger than what is required (10 year/24 hour storm capacity). This design will make any discharge event to Toms Creek very rare.</p>
102	The second point is SGI is not testing the health of the streams. The goal we all share, I believe SGI and it's employees share this goal as well, is to keep our streams and rivers clear and in good health. It's good that SGI sometimes does its discharges for various heavy metals and other chemical pollutants, but this is not sufficient. It's indirect and it's inconclusive. Since we all care about the ongoing health of the streams, one appropriate inexpensive measurement would be to do regulate macroinvertebrate counts in a few places on a regular basis. DEP should do this testing upstream and downstream of every place SGI discharges, both for Tom's Creek and Miney Branch. Just as important, DEP should test upstream and downstream of every place SGI disturbs the runoff before it goes into Tom's Creek. These results should be published and action immediately taken to correct problems before they become severe. There should be baseline tests done before any disturbance of Pine Hill. All testing has to be done by people independent of SGI. That's not accusing SGI of anything. Independence is important so that SGI is protected and the public believes the results.	14	Surface Water Quality	<p>Please see response to comment 97 (stream survey).</p>
103	I ask when they're pumping out into Miney's Branch and they say it's less than the 30 milligrams per liter, are they testing of that, and have they shown you the results of that test, or are they just speculating on that? Because I would say where are the test results? You can say that you're keeping below the limits, but if you're getting all sorts of - and I own a property on Miney's Branch. I have free dust there, too. So how do you - we know that this is true?	34	Surface Water Quality	<p>The permittee is required by the NPDES permit to submit bi-monthly (2) samples per month for each permitted outfall. The Charmian Plant Discharge Monitoring Reports (DMR) for outfall 001 for the Lower Mill Ponds are submitted by SGI on a quarterly basis. A review of the sample analyses submitted by SGI over the last five (5) years show that the highest reported Total Suspended Solids (TSS) was 38.0 milligrams per liter (mg/L) on December 20, 2018. The TSS of outfall 001 ranged from non-detect (ND or less than the laboratory detection limit) to 38.0 mg/L with an average TSS of 10.6 mg/L. In addition to the DMRs submitted by SGI, the Department collects samples from outfall 001 during inspections. Over the past five (5) years, the Department has collected 18 samples. A review of the 18 samples collected by the Department show that the highest TSS was 178 mg/L collected on July 23, 2018. The TSS of outfall 001 of samples collected by the Department ranged from < 5 to 178 mg/L with an average of 19.8 mg/L. The Department wrote a compliance order for the sample collected on July 23, 2018. Since the compliance order issued on July 23, 2018, SGI has taken measures to upgrade the Lower Mill Ponds by: 1. Grouting an abandoned discharge point (P-29) to eliminate a leak that was identified in the Fall of 2018; 2. Added the use of filtration to outfall 001; 3. Upgraded an existing sediment basin to allow for additional retention of surface water runoff prior to entering the Lower Mill Ponds. Recent discharge samples from outfall 001 collected by SGI and the Department show compliance with the effluent limitations with TSS ranging from ND to 21.0 mg/L.</p>

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
104	The plans to expand the mining would produce more risks and possibly increase the discharge of suspended solids into Tom's Creek. SGI, their DMR discharge monitoring reports show as long range compliance with total suspended solids, but these reports historically show noncompliance. One would argue from the point alone that SGI's expansion plan should not be permitted.	76	Surface Water Quality	Please see response to comment 103 (effluent characterization).
105	Water- I want the hydrology to be reviewed and verified to prevent degradation of Toms Creek because Toms Creek is a specially protected watershed. I want to know that the wetlands supporting the endangered species will still be watered, as well as Toms Creek still be flowing HQ of EV. And I want to know what the levels of copper and selenium in the runoff from the existing and the proposed new mine to prevent the poisoning of the watershed.	73	Surface Water Quality	Please see response to comment 100 (wetlands). Discharges causing pollution are not anticipated from the Northern Tract Quarry operation since the only discharges expected would occur during precipitation events greater than a 100 yr./24 hr. storm event.
106	The quality of our pure water is less and less certain.	78	Surface Water Quality	Pursuant to 25 Pa. Code § 77.457, DEP does not expect adverse effects on the quality and quantity of surface and groundwater both within the proposed permit and adjacent areas due to the proposed noncoal mining activities. The Northern Tract Quarry permit application will utilize a surface and groundwater monitoring program to monitor the water quality surrounding the permit area. This includes monitoring at upstream and downstream monitoring points established on the following streams: Unnamed Tributary to Toms Creek and Toms Creek. In addition, a total of 6 monitoring wells (MW-8D, MW-9D, MW-10D, MW-11D, MW-13D and MW-14D) developed to a depth below the lowest level of mining (740 ft-amsl) and one private water supply (PWS-15A16) will be monitored for both quality and quantity. Four surface water features (DCNR Seep 1, Upper Seep, Pond 1 and Wetland C) will also be monitored for both quality and quantity.
107	Will mining of the proposed Northern Tract Quarry result in the dewatering of Tom's Creek?	79	Surface Water Quality	Please see response to comments 100 (wetlands) and 106 (water monitoring).
108	Will mining of the proposed Northern Tract Quarry result in the dewatering of any wetlands in the vicinity?	79	Surface Water Quality	Please see response to comment 100 (wetlands).
109	Will Tom's Creek and its tributaries still be flowing and HQ or EV during and after the mining?	73	Surface Water Quality	Please see response to comment 100 (wetlands).
110	Will the protected wetlands still be wetlands? Where will that wetland water be coming from and going to?	73	Surface Water Quality	Please see response to comment 100 (wetlands).
111	Will the water which will collect in the post-mining impoundment at the proposed Northern Tract Quarry be "dead" water? Will it contain too much dissolved copper sulfate to support any life?	73	Surface Water Quality	Please see response to comments 106 (water monitoring) and 250 (effluent characterization). The post-mining water quality of the fresh water impoundment at the proposed Northern Tract Quarry is anticipated to be similar in water quality to the active adjacent Pitts Quarry. A sample was collected of the pumped pit water as part of the effluent characterization sampling performed for Pitts Quarry NPDES renewal. The results of the water sample can be found in Module 2: NPDES Information, Section D. Effluent Characterization, item 27 of the permit application.
112	Climate change and the frequency of storm events cause overflow into streams and tributaries. The sedimentation ponds currently in use in the Miney Branch watershed are not adequate to withstand the frequency and severity of storms we now face.	73	Surface Water Quality	Please see response to comment 96 (stormwater management).
113	How will these sedimentation ponds be sufficient with the added burden of all the water which formerly fell on Pine Hill collected in the new ponds and needing to be pumped over the mountain prior to discharge?	73	Surface Water Quality	Please see response to comment 81 (stormwater management).
114	Tom's Creek was over-run with green sludge following a storm event in May 2011. Storm events and human error such as these must not release green sludge into Tom's Creek.	73	Surface Water Quality	Please see response to comment 41 (reclamation).
115	Is Tom's Creek accurately designated as High Quality, or is it actually of Exceptional Value status?	73	Surface Water Quality	The designated use of Toms Creek is currently High Quality - Cold Water Fishes.
116	Could the 2011 green sludge spill event described earlier explain why in 2014 the DEP's macro-invertebrate sampling data did not show Tom's Creek as meeting Exceptional Value status?	73	Surface Water Quality	Surveys of Toms Creek were conducted in 2011 and 2014, both indicating that the existing use of High Quality – Cold Water Fishes is appropriate. Any impacts from a discharge event in 2011 would not have influenced the 2014 survey, and the consistency of the two surveys is further confirmation of this.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
117	Following the 2011 green sludge spill event, SGI sampled our water for contamination. We requested analysis for all heavy metals and poisons, however only iron and lead were analyzed for. No chemicals were ever analyzed for.	29	Surface Water Quality	The release in May 2011 was of erosion from rain runoff containing dirt and rock fines. The rock and rock fines have been tested extensively and are not toxic or poisonous and they do not leach anything dangerous; they are simply particles of clean rock. The parameters of concern for a rock fine release are suspended solids and discoloration. In addition, SGI performs effluent characterization sampling from its permitted outfalls for a range of metals and other toxic pollutants in conjunction with regular NPDES permit renewals.
118	Due to SGI's current operations, Miney Branch now contains enormous amounts of green "grit."	87	Surface Water Quality	Please see response to comment 83 (stream testing).
119	Following a storm event in early 2010 where we received 9+ inches of rain, Miney Branch was green, a result of SGI's current operations. After which I filed a complaint with DEP and got no response.	87	Surface Water Quality	Please see response to comment 41 (reclamation).
120	The excavation on the Northern Tract property may alter the hydrology of the area, which could reduce the flow of Tom's Creek, and could decrease the available water for private water supplies in the area.	79	Surface Water Quality	Please see response to comments 77 (groundwater monitoring) and 100 (wetlands).
121	Nowhere in the Northern Tract Quarry application is there conclusive proof that the hydrology of the area will not be degraded.	79	Surface Water Quality	Module 8 of the proposed Northern Tract Quarry provides a description of the hydrology of the area with respect to the permit area. Specifically, Module 8.3(d) provides an evaluation of the effects previous mining has had on the quantity and quality of the groundwater in the area. As noted in the response for Module 8.3(d), SGI's adjacent quarry operation (Pitts Quarry) actively mines the same metabasalt of the Catocin formation that underlies the proposed Northern Tract Quarry. Skelly and Loy (SGI's Consultant) has not identified any off-site water supplies that have been adversely impacted, contaminated, diminished or interrupted as a result of mining activities conducted at Pitts Quarry. The Groundwater Model Report also found in Module 8 provides additional details related to effects of previous mining in the area on the quantity of the groundwater in the project area. The Department completed a review of the most recent water quality analysis from each monitoring point, however, monitoring wells MW5 and MW2 show fluctuations in iron concentrations ranging from 0.36 to 41.2 milligrams per liter (mg/L) for MW5 and 0.67 to 26.9 mg/L for MW2. The analysis for MW5 and MW2 with higher concentrations correlates with increased Total Suspended Solids (TSS). A review of the recent water quality analysis for the nearest receiving stream points (SS-9 and SS-10) to MW5, show iron concentrations ranging from 0.06 to 1.2 mg/L for SS-9 and iron concentrations ranging from 0.17 to 1.3 mg/L for SS-10. A review of the recent water quality analysis for the nearest receiving stream point (SS-2) to MW2, show iron concentrations ranging from Non-Detect (ND) to 0.26 mg/L. The background analysis for MW5 and MW2 show that iron concentrations have historically been elevated when compared to the surrounding monitoring wells. A review of the recent Static Water Level (SWL) measurements for each monitoring well show that the measured elevations remain within background levels for each monitoring well. The monitoring wells will continue to be monitored for Pitts Quarry in addition to the monitoring wells established for the Northern Tract Quarry. Based on the information provided in the Northern Tract Quarry application and current water monitoring analysis, degradation to the local hydrology is not anticipated.
122	Module 14 of the Northern Tract Quarry application indicates that wetlands on and adjacent to the Northern Tract property could possibly be drained as a result of the Northern Tract Quarry excavation.	79	Surface Water Quality	See response to comment no. 100. There are several wetland areas labeled A thru E along the Unnamed Tributary to Tom's Creek on the southeastern portion of the permit. A botanist will conduct a comprehensive vegetation survey of Wetland D to document current baseline conditions. The wetlands will be monitored yearly during mining. A mitigation strategy will be developed in coordination with the Department should impacts be realized. Presently this wetland will be the most likely of the wetlands to be impacted. If Wetland D is impacted then the adjacent wetlands will be monitored during mining as well. If any wetlands are impacted SGI will have to mitigate the wetlands by constructing additional wetland in the Tom's Creek watershed.
123	The available spatial footprint is limited at the SGI properties to increase the capacity of the ponds receiving the discharge volumes from the proposed Northern Tract Quarry. DEP needs to pay special attention to the calculated capacity of the lower mill pond system. This is concerning because the 100yr/24hr storm event volume referenced is happening more frequently than in the past, which increases the discharge volume to Miney Branch, and increases the potential to discharge to Tom's Creek.	79	Surface Water Quality	Please see response to comment 81 (stormwater management).
124	SGI's reasoning that a discharge to Tom's Creek would only be during an extreme weather event, and such a weather event would already be causing Tom's Creek to have an increased sediment load, so a discharge from SGI's facility would have a similar sediment load and therefore should be allowed, is faulty reasoning. The Clean Water Act states that a discharge should not add to or contribute to the pollutant load to the receiving stream.	79	Surface Water Quality	Please see response to comment 96 (stormwater management).
125	SGI's Northern Tract Quarry application fails to mention that Friends of Tom's Creek has been actively seeking a designation of Exceptional Value for Tom's Creek.	79	Surface Water Quality	The permittee (SGI) is required to provide the current designated use for the receiving streams of the proposed Northern Tract Quarry. The permittee has correctly identified the current designated use for the receiving streams as High Quality - Cold Water Fishes.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
126	SGI operations are degrading Miney Branch Creek, a Migratory Fish stream, and expansion of operations onto Pine Hill will increase degradation of our streams and threatens one of our most treasured natural resources, Toms Creek, a High Quality stream, with Exceptional Values, as well as four wetlands that provide critical habitat.	32	Surface Water Quality	SGI is required to monitor all discharges from the Lower Mill Ponds going into the Miney Branch Creek to meet the required water quality limits. Thus, any discharges from the Lower Mill Ponds will not degrade the Miney Branch Creek. The water from the Toms Creek Watershed being diverted to the Miney Branch Watershed will have minimal impact to the Toms Creek Watershed since it only makes up approximately 2 percent of the Toms Creek Total Watershed.
127	Under 25 Pa. Code § 77.126(a)(3) SGI's permit application must be denied because SGI failed to demonstrate there is no presumptive evidence of potential pollution of our waters.	32	Surface Water Quality	Please see responses to comments 77 (groundwater monitoring), 79 (effluent characterization), 80 (stream impacts), 100 (wetlands).
128	Under 25 Pa. Code § 77.126(a)(6) SGI's permit application must be denied as SGI has shown a lack of ability to comply with the Surface Mining Conservation and Reclamation Act (52 P.S. ii 1396.1-1396.19b).	32	Surface Water Quality	Please see response to comment 2 (compliance). The single violation on SGI's compliance record does not constitute a pattern of violations.
129	While SGI characterizes discharges into Tom's Creek and its tributaries as "extremely rare," such discharges may occur on a more regular basis, and anticipated impacts have not been fully scrutinized.	18, 45	Surface Water Quality	Please see response to comment 96 (stormwater management) .
130	SGI's application materials do not provide baseline data for Tom's Creek and its tributaries. Without baseline data, neither the Department, SGI, nor the public is able to evaluate whether proposed discharges will degrade the quality of Tom's Creek.	18, 32, 45	Surface Water Quality	SGI has provided 6 background samples for the following monitoring points: SS-TC-US (Upstream Toms Creek), SS-4 (Midstream Toms Creek), and SS-TC-DS (Downstream Toms Creek) that include measured flow measurements and analytical data. In addition, SGI has also provided 6 additional measured flow measurements that coincide with 6 measured static water elevations for each monitoring well.
131	The frequency of severe storm events is increasing, and this should be considered when reviewing the pond design for the proposed Northern Tract Quarry.	83	Surface Water Quality	Please see response to comment 96 (stormwater management).
132	SGI's application must be denied because SGI's social or economic justification was approved without public participation and SGI failed to properly assess impacts to Tom's Creek as a result of proposed discharges.	32	Surface Water Quality	See response to comments 38 (Anti-Degradation Supplement), 165 (reclamation). The SEJ submitted by SGI will only be formally approved if the permit application is approved. Public hearings were held to solicit public input on the entire permit application, including the SEJ, on July 23, 2018, and on January 30, 2019. One of the primary reasons for the scheduling of the January 30, 2019 public hearing was to address concerns regarding public participation in the SEJ process. The inclusion of comments and corresponding responses in this document pertaining to the SEJ submitted by SGI is evidence of that public participation process.
133	Anticipated impacts to Tom's Creek have not been adequately evaluated. Storms once considered extreme and unusual are occurring on a much more frequent basis. The Pennsylvania Department of Conservation and Natural Resources (DCNR) has noted "Pennsylvania has seen measurable changes in temperature, precipitation, and storm intensity." DCNR Climate Change Adaptation and Mitigation Plan (June 2018) at 4. Specifically, "precipitation has increased about 10 percent over the past 100 years, and heavy precipitation events also have increased significantly...precipitation is expected to increase by 8 percent annually and by an additional 14 percent during the winter." Id. As a result of increased storms due to climate change, DCNR plans to reevaluate 50-year, 100-year, and 500-year floor trends. Id. at 9. While SGI dismissed the likelihood of a 100-year storm event or the chances of smaller storms occurring over the course of several days, such events are becoming increasingly common.	32	Surface Water Quality	Please see response to comment 96 (stormwater management).
134	The Department should evaluate potential impacts to Miney Branch resulting from the additional water to be redirected from the Northern Tract prior to taking action on the Northern Tract permit application.	32	Surface Water Quality	Please see response to comment 83 (stream testing).
135	How are the settling ponds monitored and how and when is the effluent released to existing streams and water courses?	41	Surface Water Quality	The ponds will be inspected after every storm event or on a minimum weekly basis. The inspection will entail a visual inspection of the impounded water level and clarity; measurement of the sediment storage level to ascertain its level relative to the maximum permitted sediment cleanout level; and observation of other pertinent features of the pond and adjoining area (such as contributing ditches). The ponds will be dewatered by pumping within 2 to 7 days following a storm event to the Lower Mill Ponds or the Pitts Quarry pit if necessary. A discharge to Toms Creek will only occur in the event of a storm exceeding the 100 year/24 hour precipitation event.
136	Are specimens for silt collection made, and what is their status?	41	Surface Water Quality	Stream and discharge water is monitored for suspended solids, a measure of the suspended material, including silt, present in the water. The current NPDES permit for the existing SGI operations includes effluent restrictions for suspended solids, and the NPDES permit that could be issued for the Northern Tract Quarry will also include these restrictions.
137	What is the nature of residential well and stream contamination? How has this been addressed?	41	Surface Water Quality	Please see response to comment 103 (effluent characterization). The Department has only received one well water quality complaint that was determined to not be mining related. If residents are experiencing water quality issues, please contact the Department to file an official complaint for the Department to investigate.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
138	Are there any designated wetlands on SGI's property?	41	Surface Water Quality	Please see response to comment 100 (wetlands). Yes, there are several wetland areas labeled A thru E along the Unnamed Tributary to Tom's Creek on the southeastern portion of the permit.
139	What is required during rain to keep any residue on the roads for adjoining property owners?	41	Surface Water Quality	The only property owners who may be impacted by residue on the roads would be at the plant entrance and SGI has a street sweeper that is required to remove any residue from the entrance road.
140	Is there sufficient evidence that the runoff anticipated at the proposed Northern Tract Quarry can be contained?	61	Surface Water Quality	The Department requires every permit must have an Erosion & Sediment Plan submitted and approved to make sure no runoff can go off the mining area. Specialty Granules has submitted an E & S Plan that has the ditches and sediment ponds designed for a 100 year-24 hr. storm event. The Department regulations require the permittee to have at least a 10 year-24 hr. storm event design for the ditches and ponds. Therefore, the Northern Tract Permit E & S Plan is designed to prevent any runoff from the quarry for most storm events.
141	Is there sufficient evidence that Tom's Creek and Miney Branch and surrounding areas will not be damaged by water discharge practices of Specialty Granules, LLC?	61	Surface Water Quality	Please see response to comment 103 (effluent characterization). SGI is required to monitor all discharges from the Lower Mill Ponds going into the Miney Branch Creek to meet the required water quality limits. Thus, any discharges from the Lower Mill Ponds will not degrade the Miney Branch Creek.
142	There are serious questions regarding the hydrology on Pine Hill, given that there are sensitive wetlands and a first-class trout stream at the edge of the site that would be negatively affected by the removal of the mountain. People are concerned about their drinking water supplies as well.	21, 22, 23, 24, 25, 26, 30, 46, 56, 57, 58, 65, 66, 67, 68	Surface Water Quality	Please see responses to comments 77 (groundwater monitoring), 79 (effluent characterization), 80 (stream impacts) and 100 (wetlands).
143	The current sedimentation ponds are not adequate to withstand the frequency and severity of storms that we now face. Green sludge overflowed into Miney Branch and onto residents' private property this past week during consecutive days of heavy rain. There is no assurance that the same thing will not happen again and again. Green sludge might, indeed, flow into Tom's Creek which contains such sensitive and rare macroinvertebrates that aquatic biologists have never seen them before except in books.	21, 22, 23, 30, 24, 25, 26, 30, 56, 57, 58, 65, 66, 67, 68	Surface Water Quality	Please see response to comment 81 (stormwater management).
144	By impounding and removing any natural rainfall using ponds and ditches, this plan would upset the hydrological balance of the watershed, prevent water from getting to the trees, plants, wetlands and streams on all sides, and prevent any groundwater recharge within the 85 acre operational area. There are relatively large wetland areas and documented vernal pools both to the north and the southeast of the operational site which would be deprived of the water they need to survive. Also, Tom's Creek and its UNT would experience less flow, and diverting flow from HQ streams over a period of decades is prohibited.	55	Surface Water Quality	Please see responses to comments 77 (groundwater monitoring), 79 (effluent characterization), 80 (stream impacts) and 100 (wetlands).
145	Discharging more water into Miney Branch would harm the Tier I stream.	55	Surface Water Quality	Please see response to comment 83 (stream testing).
146	DEP's failure to establish base level values for the HQ streams, wetland, and Miney Branch indicates DEP is not taking seriously the environmental concerns of residents of the area and is failing to live up to their obligations under their own regulations as well as the PA Environmental Rights Act. Baseline monitoring of these natural resources should be established by monitoring during all seasonal shifts. One time evaluation of the wetlands by SGI does not comply with the law.	55	#VALUE!	DEP takes seriously its obligations to review permit applications such as SGI's in accordance with established laws and regulations and the Pennsylvania Constitution. The Northern Tract Quarry permit application will utilize a surface and groundwater monitoring program to monitor the water quality surrounding the permit area. All monitoring points have a minimum of six (6) baseline samples. The monitoring program includes monitoring at upstream and downstream monitoring points established on the following streams: Unnamed Tributary to Toms Creek and Toms Creek. In addition, a total of 6 monitoring wells (MW-8D, MW-9D, MW-10D, MW-11D, MW-13D and MW-14D) developed to a depth below the lowest level of mining (740 ft-amsl) and one private water supply (PWS-15A16) will be monitored for both quality and quantity. Four surface water features (DCNR Seep 1, Upper Seep, Pond 1 and Wetland C) will also be monitored for both quality and quantity. There are several wetland areas labeled A thru E along the Unnamed Tributary to Toms Creek on the southeastern portion of the permit. Prior to mining the Northern Tract Quarry, the permittee shall have a qualified botanist conduct a comprehensive vegetation survey of Wetlands A, C and D to document current baseline conditions, including a Prevalence Index and FAC Neutral Test scores, and shall provide the results of the survey to the Department. Comprehensive vegetation surveys of Wetland D shall be completed twice per year. One shall be completed during the wet weather months (April, May or June); the other shall be completed during the dry weather months (August, September or October). The results of the semi-annual surveys shall be provided to the Department by December 31st of each year following commencement of Northern Tract Quarry operations. The permittee must meet each of these requirements unless otherwise approved in writing by the Department. If a change in the wetland vegetative community is observed in Wetland D, the permittee shall develop a mitigation strategy in coordination with the Department and begin conducting semi-annual comprehensive vegetation surveys of Wetland A and C. One survey shall be completed during the wet weather months (April, May or June); the other shall be completed during the dry weather months (August, September or October). The results of the semi-annual surveys for Wetland A and C shall be provided to the Department by December 31st of each year following commencement of the semi-annual surveys for Wetland A and C. The permittee must meet each of these requirements unless otherwise approved in writing by the Department. Any affected wetland shall be replaced with wetlands of similar functions and values. The replacement wetlands shall be properly constructed, shall have properly functioning hydrology, and shall be growing the specified wetland species before the bonds are released.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
147	There have been outflows to Miney Branch, to such an extent that SGI has sent documented recovery teams to mitigate the damage downstream	8	Surface Water Quality	SGI has never sent "recovery teams" to mitigate damage to Miney Branch. SGI has investigated complaints regarding alleged impacts to Miney Branch, but those investigations have never warranted remedial actions in Miney Branch. As noted in SGI First Responses §11.1, in response to May 2011 release event, SGI responded with a crew of personnel who used shovels and buckets to collect fine material on the hillside adjacent to the West Ridge quarry area (not in Miney Branch), and subsequent corrective engineering actions were taken to avoid similar incidents in the future. See SGI First Responses §11.1 for additional detail.
148	I calculate that the retention facility at the outfall to Miney Branch would need to be increased in volume by a factor of 10 in order to accommodate the rainfalls that we are currently witnessing.	8	Surface Water Quality	Please see response to comment 140 (stormwater management).
149	If the retention facility at the outfall to Miney Branch is such a wonderful retaining facility, why is it hidden behind no trespassing fences from the general public?	8	Surface Water Quality	Protective fencing is a standard security and public safety measure that is routinely implemented at many locations such as residential, commercial, industrial and mining. SGI's fencing is see-through at most locations and is not an attempt to hide any operations.
150	Why was nothing said about the capability of this retaining facility once you double the size - runoff footprint - of the SGI operations? No way that you will handle the more and more frequent overflow of contaminated water down stream.	8	Surface Water Quality	Please see response to comment 96 (stormwater management).
151	Why were you (Dan Welte) so reluctant to actually meet with me there today to actually witness the supposed retention of the outflow from the SGI facility?	8	Surface Water Quality	Contact information was not provided at the time to accommodate a meeting, complainant was also instructed to submit a formal complaint for investigation, which was never done.
152	With respect to review of the Specialty Granules, LLC application, we respectfully request an independent hydrologic testing of Toms Creek and the tributaries that flow into Toms Creek. We request that this testing be conducted at the earliest opportunity, and most important, before any action is taken on the application.	73	Surface Water Quality	The background stream sampling and flow measurements collected from monitoring points established on Toms Creek included in the Northern Tract Quarry application satisfies regulatory requirements found in 25 Pa. Code § 77.406 for surface water information. In addition, Tom's Creek has been monitored by SGI during the lifetime of their existing operation. The data available adequately characterizes the water quality of Toms Creek.
153	Even if Tom's Creek only qualified as an HQ water, however, the analysis done by SGI is inadequate and fails to justify degradation. The Department's Antidegradation Guidance Document relies on the preamble to the DEP's regulations published in the PA Bulletin on July 17, 1999 and indicates that "the SEJ analysis should be a 'balancing' type evaluation. In such an evaluation, the asserted beneficial social or economic development must be viewed in light of, and weighed against, the degree of water quality degradation that the discharge and the proposed activity are projected to cause." The Department's Antidegradation Guidance Document goes further and identifies several SEJ evaluation factors, including: 1) water quality considerations such as sensitivity of water uses, nature of pollutants, degree of change in water quality, reliability of treatment technology, compliance records and other factors; 2) social or economic considerations such as effect on public services, on public health and safety, on quality of life, on employment, on tax revenues, tourism and other factors.	32	Surface Water Quality	Please see response to comment 38 (Anti-Degradation Supplement).
154	Further, FOTC engaged Stephen P. Kunz, Senior Ecologist with Schmid & Company Inc., Consulting Ecologists, to review Dr. Stout's Report. Mr. Kunz relayed his findings to FOTC by letter dated May 18, 2016 (attached as Exhibit D). Mr. Kunz stated that he believed Dr. Stout's findings were credible. Furthermore, he stated that, "I understand that PADEP had investigated Tom's Creek during November 2014, and did not find it to be meeting 'exceptional value' existing use at that time." He concluded that "[t]he excellent physical, chemical, and biological conditions that Dr. Stout found in Tom's Creek this spring, however, suggest that it is achieving EV existing use status."	32	Surface Water Quality	The reach sample locations used in Dr. Stout's report do not correspond with the Department's established exceptional value reference reach sample locations. Dr. Stout's sample results also do not meet the Department's Index of Biologic Integrity lower quartile score, used by the Department to rank exceptional value stations. Surveys of Toms Creek were conducted in 2011 and 2014, both indicating that the existing use of High Quality – Cold Water Fishes is appropriate for Toms Creek. Data collected by DEP to evaluate the existing use and any data submitted, including the data included in the report authored by Dr. Ben M. Stout, Ph.D., will be considered in any future protected use assessment for Toms Creek.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
155	<p>The Department must consider the data that FOTC has provided as part of this comment. The Department is required by 25 Pa. Code § 93.4c(a)(1)(i) to protect the existing uses of surface waters and is required by 25 Pa. Code § 93.4c(a)(1)(iv) to make a final determination of existing use protection for surface waters as part of a final permit or approval action.</p> <p>More specifically, the PA Code states that "[e]xisting use protection shall be provided when the Department's evaluation of information (including data gathered at the Department's own initiative, data contained in a petition to change a designated use ... or data considered in the context of a Department permit or approval action) indicates that a surface water attains or has attained an existing use." § 93.4c(a)(1)(i).</p> <p>Further, water quality in EV streams may not be reduced by a discharge, even with a social or economic justification. See § 93.4c(b)(iii) (only HQ waters may be reduced with justification).</p>	32	Surface Water Quality	Please see response to Comment 154 (stream survey).
156	<p>More robust water quality monitoring and data collection has been conducted by FOTC, however. That data suggests that Tom's Creek should be classified as an Exceptional Value Stream and must be protected. FOTC engaged Dr. Ben M. Stout III, Ph.D., to measure the biological conditions of Tom's Creek and determine if it merited consideration for classification as an Exceptional Value Stream. On April 27, 2016, Dr. Stout issued a report following sampling (attached as Exhibit C). Dr. Stout sampled benthic macroinvertebrates and compared the fauna in Tom's Creek to (1) Carbaugh Run, a nearby PA DEP Exceptional Value reference stream, and (2) an Exceptional Value stream in Greene County within Ryerson Station State Park. He concluded that "[b]ased on biological condition scores Tom's Creek achieved Exceptional Value scores (100% attainment) compared to both of the Exceptional Value streams." Dr. Stout also concluded that "[a]t the ecosystem scale these streams provide a link between the surrounding forest and the downstream river ecosystem ... [and] in addition to reptiles and amphibians, aquatic insect emergence from these streams coincides with the return of migratory birds during nesting and rearing season."</p> <p>Although the Department, by letter on May 18, 2016, ultimately informed FOTC that the locations Dr. Stout used for sampling the reference streams were unacceptable, the data he collected from Tom's Creek is important for understanding the impacts that the Mine Expansion will have on the surrounding environment.</p>	32	Surface Water Quality	Please see response to Comment 154 (stream survey).
157	<p>Further, any receiving waters for the retention ponds will experience increased pollutant loads. Princeton Hydro Report at 11. The Department must require that SGI conduct a thorough analysis to determine exactly how much water will be diverted away from Tom's Creek and toward the retention ponds and Miney Branch.</p> <p>The Clean Streams Law protects all waters of the Commonwealth, including but not limited to groundwater, rivers, streams, ponds, lakes, dammed water, springs, and all other bodies or channels, whether natural or artificial, within the boundaries of the Commonwealth, for all statewide existing and designated water uses. 35 P.S. § 691.1; 25 Pa. Code §§ 93.4a, 93.9 and 93.6.</p>	32	Surface Water Quality	Please see response to comments 77 (groundwater monitoring), 79 (effluent characterization), 80 (stream impacts), 100 (wetlands). The Department has determined that SGI provided a proper analysis for determining watershed impacts.
158	The exceptional values of Toms Creek and pure surface and subsurface waters, and the restoration of degraded Miney Branch Creek.	1, 2, 3, 42, 47, 51, 62, 63, 64, 65, 66, 67, 68, 71, 73, 74, 84, 86	Surface Water Quality	Please see response to comment 83 (stream testing), 116 (stream survey), and 125 (designated use).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
159	What can be done once the impoundment and pumps are in place? Will SGI commit to removing the barriers to allow natural rainfall to return? THIS IS AN UNTESTED ALTERNATIVE.	55	Surface Water Quality	SGI will be required to maintain adequate erosion and sedimentation controls during the lifetime of mining operations.
160	The Big Spring Watershed Association would like to register its opposition to the expansion of mining by Specialty Granules, Inc (SGI) due to impacts on Tom's Creek and Miney Branch in Adams County. Our mission is to protect and manage wild native trout populations of the Big Spring, and other natural, cultural and historical resources of the watershed. While Tom's Creek is not in the Big Spring watershed, we have a strong interest in maintaining healthy ecosystems in our home state of Pennsylvania, near the homes of PA citizens, and in the Potomac watershed in general. Clean surface water is critical for the health of plant and animal life, including human life.	71	Surface Water Quality	DEP takes seriously its obligations to review permit applications such as SGI's in accordance with established laws and regulations and the Pennsylvania Constitution. 25 Pa. Code § 77.130 requires the following: "A permit issued by the Department will ensure and contain specific conditions requiring that the permittee: ...(2) Dispose of solids, sludges, filter backwash or pollutants removed in the course of treatment or control of waters or emissions to the air in the manner which prevents violation of an applicable State or Federal law. The permittee shall conduct the activities in accordance with measures specified in the permit that are necessary to prevent environmental harm or harm to the health or safety of the public." Should the Northern Tract Quarry permit be issued, the permittee will be required to operate according to all necessary protocols, acts, laws and regulations required for the SGI permit. Noncompliance with these regulations will result in enforcement action which may include penalties, orders, or cessation of operations.
161	Discharge into Tom's Creek and Miney Branch (a Cold Water Fish Stream) would mean a new pollution burden, adversely affecting aquatic life there.	71	Surface Water Quality	Should the proposed Northern Tract Quarry permit be issued, any discharge into Toms Creek or Miney Branch would be subject to effluent limits designed to protect the receiving streams, and prevent any impacts to aquatic life.
162	What is proposed by SGI is not only a new source of watershed degradation in an ecologically valuable and fragile area, but also a chronic source of degradation, by a company with a poor history of returning mined lands to high quality post-mining forests. Accordingly, we strongly oppose the issuance of the requested permit to SGI.	71	Surface Water Quality	The proposed Northern Tract Quarry will utilize two stormwater management ponds (NT Pond No. 1 and NT Pond No. 2) that are designed to detain the runoff from a 100 year/24 hour storm event without discharging, providing these ponds with excess available storage volume. Discharges causing pollution are not anticipated from the Northern Tract Quarry operation since the only discharges expected would occur during precipitation events greater than a 100 year/24 hour storm event that will be required to be a non-degrading discharge. The post-mining land use and reclamation plan for the proposed Northern Tract Quarry will consist of an unmanaged water impoundment surrounded by forestland providing wildlife habitat and access to water in the impoundment for fire suppression and emergency services (Hamiltonban Township Conditional Use Permit). A detailed outline of the proposed reclamation plan can be found in Module 20 of the Northern Tract Quarry permit application. Current reclamation includes approximately 14 acres on a hilltop below the "Headlap Plant" (near the railroad tracks) that was placed back into grasses and trees. Also, the Charman Quarry was entirely backfilled with fine and spoil materials and will be topped with topsoil, seeded & mulched in the next couple of years.
163	HEALTH - Mining greenstone, which SGI suggests is "inert" and harmless, presents an unacceptable level of health and environmental risks due to toxins and contaminants, including copper, silicates, and naturally occurring asbestos. Nearby Miney Branch, an unhealthy stream, is proof of SGI's degradation of water resources and downstream pollution. Green grit and sludge have buried the natural cobble that is necessary to support macro invertebrates, fish, and other aquatic life. The green grit and sludge are not life sustaining for any form of life.	73	Surface Water Quality	Please see response to comment 83 (stream testing).
164	SGI claims that this will have little effect on Tom's Creek because it's a small part of the entire Tom's Creek watershed. This ignores the fact that this particular runoff goes directly into the HQ portion of Tom's Creek, an important recreational fishing area (as documented by the Trout Unlimited speaker at the January 30, 2019 hearing).	14	Surface Water Quality	Please see response to comment 80 (stream impacts).
165	Here is a photo of this part of Tom's Creek, showing its small size and some of the moist embankment around it. This area is obviously dependent on every drop of rain water it can collect, as this photo was taken during the wettest year in living memory in this area. Why can't SGI retain the steep northern and northwestern hillsides to protect this watershed? Obviously this would reduce the amount of metabasaltic that could be quarried, but in terms of the SEJ this has to be weighed against the damage to the watershed and its long-standing recreational uses. How many years of operation does SGI expect to get from the Northern Tract?	14	Surface Water Quality	Please see response to comment 80 (stream impacts). In addition, SGI will maintain a buffer of 300 feet vegetated riparian buffer along Toms Creek and the Unnamed Tributary to Toms Creeks as per the Hamiltonban Township Conditional Use Permit (CUP). The CUP buffer is shown on the Exhibit 9: Operations Map for the proposed Northern Tract Quarry. The proposed Northern Tract Quarry is projected to have maximum of approximately 55 years of operation for mining and approximately 2 to 3 years for completion of final reclamation. A detailed timetable for each level of mining can be found in Module 10.6 Reclamation Timetable of the Northern Tract Permit application.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
166	<p>In the summer of 2018, The Fairfield Municipal Authority entered into an agreement with the Department of Environmental Protection, Source Water Protection Technical Assistance Program to have a plan prepared for our system by the engineering firm Spotts, Stevens and McCoy. We are in the middle of this process, with the first draft of the plan completed and under review. Identified in the process was the influence that S.G.I. could have on the groundwater from which our four municipal wells draw for the entire system.</p> <p>Included with this letter is Figure 3-2 Source Water Protection Zones from the draft plan. Language from the draft states "The groundwater that enters the wells is derived from groundwater traveling northeast along the Toms Creek valley, which may act as a partial recharge boundary. For this reason, Zone III includes the entire upstream portion of the Toms Creek watershed..." Please consider this a formal request to have this information part of the public record for your consideration during the review process.</p>	70	Groundwater	DEP's Southcentral Regional Office was contacted by Cambria District Mining Office in regards to the draft source water protection plan for the Fairfield Municipal Authority. The proposed Northern Tract Quarry lies within the proposed wellhead protection Zone III and approximately 2,500 feet east of the wellhead protection Zone II boundary as shown in the proposed Figure 3-2 Source Water Protection Zones from the draft plan currently under review. Therefore, since the proposed Northern Tract Quarry is located outside the proposed wellhead protection Zone II for the Fairfield Municipal Authority there are no restrictions that prohibit the proposed surface mining activities.
167	Pine Hill, the proposed mining site, is 112 acres of land with important scenic and historical attributes, and is part of the "specially protected watershed" flowing into the Chesapeake Bay. Blasting will also impact septic tanks and any toxins discharged into Tom's Creek will leach through ground fissures into the aquifer, which residents of the area rely on for drinking water. Not only is the scenic and ecological value of Tom's Creek at stake, but also the health, property, and cultural heritage of its human neighbors.	9, 35	Groundwater	SGI will perform quarry blasting in accordance with its approved Module 16 Blasting Plan included in the Surface Mine Permit. The design and purpose of the blasts is to fracture rock in the immediate vicinity of the quarry bench where stone is to be extracted. Blasting will not accelerate the movement of groundwater at distances not affected by the blasting nor will it affect septic tanks.
168	SGI goes to great lengths to explain how the NT quarry will not affect surrounding groundwater because of the nature of the metabasalt rock. IT CONCLUDES THAT TOMS CREEK AND THE SURROUNDING TRIBUTARIES AND WETLANDS ARE ALMOST COMPLETELY DEPENDENT ON RAINFALL. So how can the watershed not be severely affected by the impoundment and diversion of most of the natural rainfall coming off of Pine Hill? How does the increased temperature of the shallower water affect stream health? Monitoring is useless if it is not done on such a frequent basis and thoroughly enough to catch the beginning stages of decline.	55	Groundwater	Please see response to comment 38 (Anti-Degradation Supplement), 80 (stream impacts), and 106 (water monitoring). The monitoring frequency for the Northern Tract Quarry will consist of quarterly sampling for each surface water monitoring point for both quality and quantity. Static water elevations (SWL) will be collected from each perimeter monitoring well on a quarterly basis during initial development of the Northern Tract Quarry. Once the Northern Tract Quarry advances below an elevation of 1050 feet, the monitoring frequency for the perimeter monitoring wells SWL measurements will accelerate to monthly. All monitoring wells will be required to have a minimum of one annual sample collected for quality purposes.
169	Will the water table be recharged properly so that neighbors' well and springs still have drinking water in them?	73	Groundwater	Please see response to comment 80 (stream impacts).
170	Groundwater monitoring wells setup by SGI around the Northern Tract property indicate depth to water from 17' to 68' and the depth of aquifer from 45' to 394'. SGI has plans to excavate the Northern Tract Quarry deeper than 300', the depth of excavation combined with the fact that SGI only has a 300' vegetative buffer, and a 150' operations buffer, could result in alternate groundwater flow, which in part supports the flow volume of Tom's Creek.	79	Groundwater	Please see response to comment 80 (stream impacts).
171	Module 8 of the Northern Tract Quarry application includes a groundwater modeling report that is full of words like "may," "could," "potential," and is all steered toward how the Northern Tract Quarry may not have the potential to affect Tom's Creek. However, the report also says that there are several cracks or fissures in the bedrock that are connected to Tom's Creek and to the Pitts Quarry. This groundwater monitoring report could easily be reinterpreted to make an equally convincing argument that the Northern Tract Quarry may have the potential to affect Tom's Creek. I'd recommend that DEP look at this document very closely.	79	Groundwater	The groundwater model report is used as a supplemental evaluation of the proposed Northern Tract Quarry in addition to the current monitoring data for the active Pitts Quarry. The groundwater model was developed and calibrated using existing site conditions that were validated by actual groundwater inflow rates derived from pumping records for Pitts Quarry, surface water flow measurements, aquifer testing and groundwater measurements collected from each monitoring well. The groundwater model report was reviewed by the Department which is demonstrated through the Technical Deficiency letters sent by the Department that address the groundwater model report. The deficiencies have been addressed by the permittee to the Department's satisfaction.
172	Can blasting affect bedrock fractures and result in a water loss or sinking of water table?	7	Groundwater	Please see response to 167 (blasting).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
173	Will the redirection of water to the Miney Branch watershed have a dewatering effect on Tom's Creek?	7	Groundwater	See response to comments 80 and 93 (stream impacts). The redirection of water to Miney Branch will not have a dewatering effect on Toms Creek. The water that will be pumped to the Charmian Plant treatment ponds will account for approximately 5 percent of the lowest background stream flow of Toms Creek at the lowest level of mining (12th level at 740 feet MSL). This water will return to Toms Creek approximately 5.5 miles downstream at the confluence of Miney Branch with Toms Creek.
174	Will the excavation of the mining pit on the proposed Northern Tract Quarry dewater the nearby wetlands?	7	Groundwater	Please see response to comment 122 (wetlands).
175	SGI's permit application materials fail to adequately address whether the proposed mining project is likely to result in loss of flow to Tom's Creek or its unnamed tributaries.	32	Groundwater	Please see responses to comments 77 (groundwater monitoring), 79 (effluent characterization), 80 (stream impacts) and 100 (wetlands).
176	What is being done and has been done to prevent leachates from the current and anticipated quarry operations from leaking to other adjoining properties?	41	Groundwater	The active Pitts Quarry & Charmian Plant utilize collection ditches to contain stormwater runoff which is conveyed to stormwater management ponds. All pit water is pumped to the Charmian Plant Lower Mill Pond system prior to being discharged. The proposed Northern Tract Quarry will utilize the same procedures to manage both stormwater and accumulated pit water that will prevent leachate from discharging to adjoining properties.
177	Have any hydrogeological reports been prepared by SGI that show any effects on the water table? Is there any scientific monitoring on the water table depletion and direct relationship between quarrying and water depletion? Have these been verified by PADEP?	41	Groundwater	Please see responses to comments 77 (groundwater monitoring), 79 (effluent characterization), 80 (stream impacts) and 100 (wetlands).
178	Some neighbors have indicated that the well water quality has declined over the years. In the four years that we have lived here, we have also noticed this decline. This new project will further diminish the quality of our water.	53, 54	Groundwater	Please see response to comment 121 (hydrology). The Department has only received one well water quality complaint that was determined not to be mining related. If residents are experiencing water quality issues, please contact the Department to file an official complaint for the Department to investigate.
179	Is there sufficient evidence that the drinking water of residents who rely on wells will not be impacted by this mining operation?	61	Groundwater	Please see response to comment 77 (groundwater monitoring).
180	Our quiet mountain heritage and pure mountain air, which we have enjoyed and cherished for many years before the intrusion of vast surface (mountain top removal) mining; and most importantly the families' health and well-being who live on or near the mountain top and whose runoff has flooded their properties multiple times this year.	42, 47, 48, 51, 65, 66, 71, 73, 74, 84, 86	Aesthetics	Please see response to comment 40 (mountain top removal). See also response to comment 44 (Article 1 Sec 27) and comments 78, 81, 123, 140, 162 (storm events and runoff).
181	373 of our supporters have signed on in support of our comments: As a concerned resident of the state of Pennsylvania, I oppose Specialty Granules, Inc., LLC's permit to mine and process greenstone in Pine Hill. Greenstone is known to contain naturally occurring asbestos, and the crushing process introduces contaminants into the air and water. If permitted, the project will blast and excavate right next door to residential properties, within 100 feet of scenic, historic roads, and within 300 feet of Tom's Creek and four ecologically-diverse wetlands containing unique and endangered species.	9, 35	Aesthetics	Please see response to comment 35 (historic), 72 (core sampling and analysis), 80 (monitoring wells), 122 (wetlands) and 44 (Article 1 Section 27).
182	Just down the way, at SGI's local headquarters, the night sky has been harshly illuminated, and we fear that harsh light is getting ever closer to us.	78	Aesthetics	Excess glare from the SGI facility may be regulated by local ordinance. SGI is responsible for complying with all local ordinances adopted pursuant to the Municipal Planning Code, and all zoning ordinances in existence before January 1, 1972 and is also responsible to provide written approval and documentation of that compliance.
183	Does calling this mining of Pine Hill – Northern Tract – a continuation of its previous operations delay the reclamation of the now-gigantic scar from the already existing mine? Will we live to see it reclaimed?	73	Aesthetics	There is not an exact timetable or fixed date for the final reclamation of the site. The "Charmian Permit" encompasses both the Lower Mill and Upper Coloring Plants, some of the crushing plant & conveyors, the lower mill ponds, and the upper Charmian Quarry area. The Charmian Quarry is in the process of being backfilled and will be planted in a couple of years. The "Pitts Quarry Permit" includes the current active pit of rock removal, the old "Advance Quarry", that is now being used for aggregate stone crushing and stockpiling, and some backfill areas and ponds on the northern end. Should the "Northern Tract" permit be issued, it will extend the entire operation into the future an estimated 25 to 50 years.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
184	Specialty Granules, LLC (SGI) is operating at nuisance levels, and expansion under a new permit will increase the nuisances we endure (noise, blasting and noxious air, night light, and truck traffic identified as nuisances).	32	Aesthetics	<p>Please see response to comment 7 (blasting) and 182 (glare).</p> <p>SGI completed a noise study of the existing Charmian Plant (to establish background) and modeled the expected noise levels resulting from the proposed Northern Tract Quarry. The study included the measurement of sound levels at seven locations around the perimeter of the Charmian Plant site. There are no established regulatory noise limits (other than that apply solely to blasting) that will apply to the proposed Northern Tract Quarry. Instead, the Department evaluates noise data based on the expected increase over background. SGI's noise study established the existing (background) average hourly noise levels to generally be 60 A-Weighted Decibels (dBA) or less, with a few exceptions, and with a maximum reading of 64 dBA.</p> <p>The study also modeled the expected sound levels from the proposed Northern Tract Quarry, which included modeling sound levels at the nine closest residences to the proposed quarry. The study modeled the expected worst case (loudest) and hourly average sound level originating from the proposed Northern Tract Quarry pit and from the eastern side of the proposed Northern Tract Quarry pit boundary. The results indicate predicted worst case sound levels from 39 to 59 dBA at the residential receptors, and 60 to 62 dBA at the property line. The results also indicate predicted average hourly sound levels of 37 to 56 dBA at the residential receptors, and 31 to 59 dBA at the property line. This represents a negligible increase in sound levels above background and does not constitute a public nuisance.</p> <p>SGI submitted an application to the Department on November 27, 2017, which was approved on October 16, 2018, to add an alternate access road connecting their operations directly with PA Route 16. The new trucking route should reduce truck traffic on roads less equipped to handle it.</p>
185	SGI's nuisance operations are crowding out healthful pursuits that historically thrived in our mountain setting.	32	Aesthetics	Please see response to comment 184 (nuisance) and 44 (Article 1 Sec 27).
186	The application must be denied as anticipated noise impacts have not been properly evaluated by the applicant.	32	Aesthetics	Please see response to comment 184 (nuisance) and 44 (Article 1 Sec 27).
187	What reports have been made about noise pollution; specifically, about noise pollution from blasting and their measured decibels with regards to mandated regulations?	41	Aesthetics	Please see response to comment 7 (blasting).
188	What are the allowable level of decibels for blasting that must be adhered to and who monitors the blasting? Are there blasting reports available and seismograph recording available for daily blasting and the strength of such blasting?	41	Aesthetics	Please see response to comment 7 (blasting). Blast records and seismograph data are required to be kept for a minimum of 3 years unless a special condition of the permit would require more. The blast records are made available to the Department upon request.
189	The fact that mining operations go on 24 hours a day/7 days a week in a residential area is unacceptable. The massive industrial operation that SGI has become has to adapt to the fact that there are now neighborhoods surrounding it.	21, 22, 23, 24, 25, 26, 30, 56, 57, 58, 65, 66, 67, 68	Aesthetics	SGI is responsible for complying with all local ordinances adopted pursuant to the Municipal Planning Code, and all zoning ordinances in existence before January 1, 1972 and is also responsible to provide written approval and documentation of that compliance.
190	We ask that you require the Applicant for the Charmian PA plant's Northern Tract expansion extend the buffer along Gum Springs Road and Iron Springs Road from 100 feet to 300 feet, and require a forest buffer be planted 10 years before mining starts. This will be to protect the historic viewshed along Gum Springs Road. (refer to John Gorman written comments for context)	16	Aesthetics	The distance limitation for noncoal surface mining activities is 100 feet of the outside line of right-of-way of a public highway. (77.504(a)) The proposed Northern Tract Quarry includes a 300 foot vegetated riparian buffer along Toms Creek and the Unnamed Tributary to Toms Creeks as per the Hamiltonban Township Conditional Use Permit (CUP). The CUP buffer and the 100 foot public highway barrier are shown on the Exhibit 9: Operations Map for the proposed Northern Tract Quarry. Therefore, the proposed Northern Tract Quarry permit application meets the required 100 foot barrier along Gum Springs Road and Iron Springs Road.
191	FOTC holds several events each year where they rely on use and enjoyment of Tom's Creek. For example, FOTC recently held a hike with the Sierra Club in the area of Michaux State Forest close to Tom's Creek with a picnic afterwards at a local resident's house. FOTC also holds a community event twice per year where they conduct water quality testing of Tom's Creek across the road from Pine Hill. There are miles of hiking and horseback riding trails in Michaux State Forest in the near vicinity of Toms Creek; the creek flows in Michaux; the Mt. Hope Rd., Gum Springs Rd., Iron Springs Rd. "loop" is a great bicycling/motorcycling route.	32	Aesthetics	Please see response to comment 80 (stream impacts).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
192	<p>Tom's Creek is also stocked with trout in the area across from Pine Hill and is a popular fishing spot in the spring. In fact, Tom's Creek is annually stocked with trout twice per year. The Pennsylvania Fish and Boat Commission stocks Tom's Creek with approximately 1,000 trout per year. The Pa Fish and Boat Cooperative Fish Nursery stocks Tom's Creek with approximately an additional 600 trout annually. Further, the Mummasburg Sportsman's Club also stocks Tom's Creek with approximately 125 trophy trout, meaning at least 16-24 inches in size. Stocking starts at the covered bridge on Jacks Mountain Road and Zoo Road, then proceeds to the bridge at Zoo Road and Iron Springs Road, proceeds upstream along Iron Springs Road until Gum Springs Road and ends at approximately Gum Springs Bridge and Mt. Hope Road Bridge.</p> <p>In addition, the community holds an annual fishing derby at Carroll Valley Park, just downstream of SGI's proposed operations. Each year approximately 80-125 families join in for a day of fishing, supported by the Carroll Valley community and at least 250 trout donated by the PA Fish and Boat Cooperative Fish Nursery.</p>	32	Aesthetics	Please see response to comment 80 (stream impacts).
193	<p>I work at SGI and this is still our home. Right now I get up and go to work every day with a great group of people, we work hard. We go above and beyond what's required. We're committed to doing things right, and we try to make the neighbors happy. But you know as well as I do that you can't everybody happy but we never stop trying. And I share the same love with Tom's Creek that everyone else does. The stream goes through the old farm property. It's where I caught my first fish as a very young boy. And really the only place I still fish today. SGI does a great job protecting Tom's Creek and with water quality in general.</p>	81	Aesthetics	DEP duly notes this comment.
194	<p>The impacts are already being felt by neighbors who have endured well-documented hardships and hazards to health and safety as a result of SGI's existing operations: reduced levels of water in drinking water wells, contaminants in drinking water wells, cracks in house foundations and other structural damage from blasting, green dust covering houses and cars and outdoor spaces, noise at all hours of the night and day, light pollution, destruction of mountains and forest cover that once attracted residents to the area, reduced flow to Tom's Creek and its tributaries – all from blasting and hydrologic changes to what was once Pine Mountain (now pits in the earth) and vicinity. In addition, we need only look at Miney Branch to see what the discharge of storm water from SGI has done to the aquatic life in that once beautiful creek. The damage is irreversible.</p>	53, 54, 55, 65, 66, 67, 72, 77, 87	Aesthetics	Please see comments 7 (blasting), 3 & 11 (reforestation), 40 (mountain top removal), 80 (stream impacts), 83 (aquatic biology investigation), 121 (hydrology), 137 (wells), 182 (glare), 184 (nuisance), 354 (access road).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
195	<p>IMPACT ON VIEW SHEDS AND DEGRADATION OF NATIONAL REGISTER HISTORIC PROPERTIES! A social and economic study must factor in the desecration of the scenic view sheds that attracted thousands of tourists to our territory at the turn of the last century. A view shed study of the historic Civil War Retreat Path and the Monterey Historic District, which is adjacent to SGI, focused on views during July, when trees are fully in leaf. SGI relies on that study as proof that view sheds are not altered. Yet, a professional study is not necessary to conclude that during at least three quarters of the year, SGI operations are in plain sight. And, please consider view sheds in the late evening and at deep night when SGI operations eerily glow and appear to be a scene from a Stephen King movie! Sadly, this nighttime horror is real. Furthermore, SGI has degraded the Historic District by failing to control the constant flow of truck traffic on the historic roads. Property values are plummeting and there is little incentive to invest in the Monterey Historic District as it is overrun by industrial, heavy tonnage trucks and overlaid with green dust. Indeed, many additional residential communities - Fountaingdale, Greenstone, Zora, and Emmitsburg - bear the brunt of heavy tonnage trucks transporting grit.</p>	55, 73	Aesthetics	See response to comment 35 (historic).
196	<p>This land (Pine Hill) – called the “Northern Tract” by SGI – was never supposed to be mined. It was purchased with Adams County taxpayer money to be conserved to protect water resources and the headwaters of Tom’s Creek and Middle Creek in perpetuity. Pine Hill fell into SGI’s hands as a result of a land swap that was carried out entirely in secrecy. Once it was disclosed to the public, it was vehemently opposed by the vast majority of residents in the community. Community residents have continued to express their opposition at every juncture. At the end of January 2019, at a hearing with DEP, 18 out of 26 speakers opposed the issuance of permits. With one possible exception, those in favor of the permits had a financial relationship with SGI – as employees, former employees, customers, etc. And very few of those in favor actually live in close proximity to the mine. The people who are directly affected in Adams County and Franklin County have spoken clearly and repeatedly in opposition to the mine expansion.</p>	55, 65, 66, 67, 77, 87	Land Swap	The land exchange between SGI and DCNR was not “secret”; rather, it was conducted with full public notice and a public hearing, comment and response process. The details of that process are described in SGI First Responses §§ 15 and 19. The public comment process on SGI’s pending applications have likewise been subject to a public notice, hearing and comment process, with speakers providing a variety of perspectives. In addition, SGI and DEP have taken multiple steps in the permitting process to address many concerns voiced by the public so that they should no longer be an issue.
197	<p>SGI is not trusted because of the devious secret swap of land it participated in to get the NT site. Also promises are not believed since many were made in 2011 but none, such as reclaiming West Ridge, were fulfilled. SGI will give \$8-10K toward a community park, or to Strawberry Hill, but that is “chump change” for a company like SGI and people know it. Your process of forms and certified letters does not allow you to understand how the company actually interacts with local governance. Hamiltonban was worried about the threat that SGI would shut down, but it doesn’t see its future tied to SGI.</p> <p>SGI has made no actual investment in any community program: No scholarships, no training programs, no sponsorship of 4-H, no partnership for badly needed community programs such as an opioid consulting clinic, etc. For all the many years of complaints lodged against the company since it moved into the Stanley Pitts property and literally started ruining the quality of life for so many people who had long lived in peace in the wooded hills, SGI has consistently chosen to take complaints on an individual basis, never creating a community outreach office.</p>	55	Land Swap	Please see response to comment 3 (West Ridge Quarry), 196 (land swap). SGI’s response §3.11 to DEP’s second deficiency letter included information about its community involvement such as: roofing material for the Monterey Pass Battlefield Museum; assisting with the revitalization of the Middle Creek trout habitat and the park’s erosion control project.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
198	<p>Usually these industries leave environmental cleanup to the municipality or the state. In the case of a surface mine which is contaminated with actinolite asbestos, the cleanup could easily end up as a Federal responsibility (i.e. Superfund).</p> <p>If the local tax base is too dependent on them it makes the municipality fragile, subject to the kind of blackmail SGI is now using to further its own private interests. Nowhere in the Adams County or the Hamiltonban Comprehensive plans is there any mention of mining as an economic basis. The quote used by SGI about Industrial development is about light industry, and surface mining is specifically noted only under "Conditional Use Zoning". (See Hamiltonban Township Zoning Ordinance.)</p> <p>The Hamiltonban "Conditional Use Permit" provided to SGI (NARRATIVE TO CONDITIONAL USE PERMIT APPLICATION (THE "APPLICATION") UNDER THE HAMILTONBAN TOWNSHIP ZONING ORDINANCE (THE "ORDINANCE")) contains a requirement which SGI has chosen to ignore, but when enforced by the township will make mining the NT difficult, if not impossible: 4.n) "There shall be no vibration which is discernible to the human sense of feeling beyond the immediate site on which such use is conducted." E. The Adams County requirements include preserving Toms Creek. (Appendix E) (See Sherry Rogers-Frost 2/13/2019 PDF for Appendix)</p>	55	Land Swap	<p>DEP believes the proposed reclamation plan for the Northern Tract and the previously approved reclamation plans for the West Ridge Quarry and currently operating Pitts Pond Quarry all include detailed reclamation cost estimates which are part of DEP's full-cost bonding program. Specifically, 25 Pa. Code § 77.202 provides for the bond posted by an operator to reflect "the estimated cost to DEP if it had to complete the reclamation, restoration and abatement work required under the act" For the Northern Tract Quarry, those cost estimates are provided in Module 10. DEP may require operators to periodically update those cost estimates and adjust the amount of the required reclamation bond. See SGI First Responses § 13.1 and SGI Second Responses § 15.1.</p> <p>DEP agrees with SGI's Second Responses § 18, which states that SGI's Conditional Use Approval does not contain conditions relating to blasting. The commenter appears to be referring to a requirement contained in Section 1303 of the Hamiltonban Township Zoning Ordinance, but that section explicitly makes clear that surface mining operations are not subject to those provisions but rather are governed by the prevailing applicable performance standard requirements of DEP.</p>
199	<p>In several places in its SEJ, and elsewhere, SGI says that certain ways of protecting Tom's Creek are "not feasible." Presumably this means "not economically feasible," since the suggestions themselves are clearly possible. It is understandable that SGI wants to maximize the profit they extract from the mining operations, but SGI has provided no quantification of their claims. SGI is truly saying that all proposed protections of the watershed would cost so much that SGI could not make a sufficient profit to make it worthwhile to stay in business. However, SGI has not provided the public with adequate data to judge these claims. Given the duplicity with which SGI engaged in the land swap to obtain the Northern Tract, why should the public have any faith in these "not feasible" statements? Even ignoring past duplicity, SGI has a glaring conflict of interest, so these statements cannot be taken at face value. How is PA DEP independently evaluating these claims?</p>	14	Land Swap	<p>Please see response to comment 20 (SEJ), 31 (reclamation), and 38 (Anti-Degradation Supplement).</p>
200	<p>CLAMMING UP THE NEIGHBORS! In Its response to community comments SGI states, "SGI understands that the Department intends to hold a second public hearing... SGI supports this decision, and welcomes full public participation with respect to the proposed Northern Tract Quarry." They further state, "As the commenters' advocate for the public's right to preservation of historic values, at the same time recognition must be given to the rights of property owners, such as SGI, to develop and utilize their property for economically-beneficial purposes in a manner consistent with applicable zoning. Here, under the applicable Hamiltonban Township Zoning Ordinance, SGI holds a duly-authorized conditional use zoning approval allowing for the Northern Tract quarry operation." We invite you, Governor Wolf, and the public at large to review the so-called conditional use hearing. SGI put a lid on citizens' rights by objecting to citizen and organizational standing to participate.</p> <p>http://www.gettysburgtimes.com/opinion/letters_to_editor/article_b2f02bcb1-8770-5da4-bb38-92b34a9c3890.html This speaks volumes about SGI's regard for its neighbors! We can all agree that property owners are entitled to use their property for economically-beneficial purposes. But, we cannot agree that property owners, irrespective of zoning, are entitled to use their property in a manner that destroys or diminishes the rights of other property owners. SGI successfully quashed the voices of citizens at the Conditional Use hearing. Further, during recent zoning hearings the township supervisors shamefully directed citizens with complaints about SGI - to SGI! The voices of citizens were CLAMMED, and oversight and accountability at the local level must be questioned.</p>	73	Land Swap	<p>Please see response to comment 196 (land swap). SGI supplied DEP with a copy of the Adams County Commissioners' December 29, 2010 letter that expresses their support for the land exchange. DEP notes there have been several public hearings for SGI's mining permits that has resulted in hundreds of public comments that DEP has considered.</p>

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
201	Please consider that Parcel No. 18A16-0022-00 (Pine Hill) has an assessed land value of \$9,700 according to Adams County Assessor online records. The taxes on that assessment are less than \$2,000. Please compare that valuation with all citizens' parcels surrounding Pine Hill. Without doubt the public trust of the community in government wheeling and dealing with SGI has been severely compromised. So, exactly what benefits flow "to our area" that outweigh the tremendous burdens?	32	Economy	Please see response to Comment 38 (Anti-Degradation Supplement).
202	Please consider citizen flight "the litmus test of a sustainable economy" away from the nuisances wrought by SGI. While rural flight might be a delightful benefit to SGI, nails would be driven in the coffin of Hamiltonban Township.	32	Economy	SGI engaged the economic consulting firm Consult Solutions, Inc. (ESI) to conduct an evaluation of property values in the area around the Charmian facility. ESI employed a hedonic regression model, commonly used to evaluate the relative importance of a series of variables on a property's value. This analysis was conducted for properties located within 3 miles of the Charmian facility and included 561 residential property transactions during the period 2000 to 2019. ESI concluded that the SGI quarry has not had a negative impact on nearby property values. According to the United States Census Bureau, the population of Adams County has increased from 91,296 in 2000 to 101,407 in 2010 and was estimated at 102,811 in 2018. Likewise, the population of Franklin County has increased from 129,253 in 2000 to 149,618 in 2010 and was estimated at 154,853 in 2018.
203	We request an INDEPENDENT social and economic study. We request that PADEP reject SGI's flawed justification for the following reasons: 1) NO NEW JOBS! Mountaintop removal operations do not produce new jobs and have the practical effect of crowding out other employment related to tourism, the service industries, health care, and support of growing retirement communities. Employment by SGI (less than 150 employees) is not growing. We believe this is due to workers being displaced by large scale mechanical excavation and off-site technology. We ask that you consider how many of the current SGI employees are Pennsylvania residents. We ask that you also factor in the suppression of competitive employment opportunities that surely will serve only the purposes of SGI, not Pennsylvania.	73	Economy	Please see response to comment 38 (Anti-Degradation Supplement) and 40 (mountain top removal).
204	Further, the final product - asphalt shingles - depends directly on asphalt, 100% fossil fuel production. The market share for asphalt shingles is waning as more and more people weigh the high environmental costs associated with asphalt as compared to environmentally friendly metal roofing.	73	Economy	As explained in SGI First Responses §2.6 and SGI Second Responses §3.11, there is a well-established market for the unique roofing granules that are produced at SGI's Charmian facility, and that market is not waning. The durability of asphalt shingles has increased dramatically over the past several decades, with manufacturers now offering 40-year or lifetime warranties, when previously 25-30 year warranties were the norm. With that durability increase, asphalt shingles utilizing durable granules such as those produced by SGI are and remain the primary roofing product in North America. Of the U.S. sloped roof market, asphalt shingles and associated "component" roofing systems represent over 75% of annual installations, compared to only 14% for metal. There is no evidence of a decreasing demand for asphalt roofs. The typical installed cost of asphalt shingle roofs is about one-half that of a comparable metal roof (\$10,000 vs. \$19,000). With low initial and life cycle costs and reasonable installation fees, shingles are by far the most popular and cost-effective roofing solution, and are an essential component of maintaining affordability in housing. Most solar roof installations are designed for asphalt roofs. In addition, asphalt is a byproduct of the refining process for gasoline production and would have to be disposed of as a waste if not put to a commercial use. The use of asphalt is therefore waste minimization and environmental friendly.
205	The only rationale propounded by ISP/SGI is that permit approval will allow ISP/SGI to continue a relatively high profit margin business beyond the normal 15-25 years it will take for the mine to get to the 840 ft level of their Pitts Quarry and finish the reclamation of both the West Ridge and Pitts quarries. No guarantees or timelines are stated for these activities and no commitment made for future employment and tax revenue. The employment of 156 persons is stated to not change by means of this permit approval, and no mention of increased tax revenue.	55	Economy	Please see response to comment 38 (Anti-Degradation Supplement).
206	There is also the uncertainty of profit in the asphalt shingle roofing business. Metal roofs are gaining market share quickly, due to architectural acceptance, the ability to shape metal in many new ways, and the increased occurrence of "major storm events." Insurance companies give discounts for metal roofs because of their strength and longevity. Solar roofs are just beginning to make an impact on the market, but once the manufacturing infrastructure is in place there is a tremendous demand which has developed and will continue to grow.	55	Economy	Please see response to comment 204 (asphalt shingles).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
207	<p>The economic plans for Adams County and Hamiltonban Township's future are based on 1) preserving agricultural, 2) recreation, 3) tourism. This is all carefully documented in their Comprehensive Plans.</p> <p>Preserving the agricultural base of Adams County is primary to any planning. The Fruit Belt (Fairfield area) is eligible for national historic preservation. The demand for grass fed beef from our fertile fields is in constant, increasing demand, as are organic produce, fresh eggs and corn.</p>	55	Economy	SGI's current and proposed operations at the Charman facility include the maintenance of 147 jobs, 91% of which are filled by employees who live within 30 miles of the facility, and the payment of \$255,000 in combined property and sales taxes to the local economy. Their operations also do not conflict with the items identified in the Adams County Comprehensive Plan.
208	If PADEP were to approve this permit application despite the strong opposition of the community, despite the written restrictions of both Adams County and Hamiltonban Township which make it clear that a normal surface mining operation is not acceptable, and despite the conflict with County and Township Comprehensive plans for the social and economic future, despite the conflict with goals of the South Mountain Initiative and Michaux Forest, PADEP would so discredit itself that its role in future decisions would be considered meaningless.	55	Economy	Please see response to comment 35 (historic) and 38 (Anti-Degradation Supplement).
209	Liberty Valley already is a major employer in the area. Orvis is moving in. Michaux Forrest and Tom's Creek are natural highlights of this part of country, and the Monterey Battlefield Park and current focus on the retreat route from Gettysburg have drawn increasing interest to the area so that the potential for growth in tourism for sport, history and recreation is high. This is not consistent with SGI's proposed new "NT Quarry".	27, 28	Economy	Please see response to comment 35 (historic) and 38 (Anti-Degradation Supplement).
210	Where is the justice for the taxpayers of Adams County who voted overwhelmingly to purchase this land with our tax dollars? We voted in an economic down turn to preserve the water of Adams County.	34	Economy	Please see response to comment 200 (land swap).
211	We were told all along and we voted and we paid with our money to protect this land. And now we are looking at this and the - I was told in Hamiltonban that they never discharge into Tom's Creek. At that zoning hearing, they said we were not going to discharge. Now they're saying they are going to discharge. And as a Township Supervisor in Freedom Township, I say, when do we ask that the truth be told to us as government. Can you afford to check every number that they're giving you or do you ask at some point that people be held accountable to be telling the truth at such a hearing as this. And I question how I could tell you that I collected data from eight days last year and Pennsylvania's a desert. Do you really want to believe me and is that good data that they're giving you? Because they're - I can choose eight days last year that Pennsylvania's a desert.	34	Economy	Please see response to comments 78, 96, 101, 123 (storm water management).
212	The post-mining impoundment will be on SGI's posted property, how can it serve a "recreation" use?	73	Economy	SGI intends for the post-mining impoundment to be available to the municipality if they wish it to be opened for public use pursuant to an agreement with the Township.
213	Today's strong employment market should be considered in the evaluation of SGI's Social or Economic Justification application.	83	Economy	Economic and water quality considerations that are included in the review of the SEJ submitted by SGI account for the expected lifetime of the proposed Northern Tract Quarry. Over that time span, fluctuations in employment rates, which by nature are volatile and unpredictable, will widely vary and can't be accurately accounted for. For this reason, the employment rate at the time of application submittal is not included as a factor in the review of an SEJ.
214	How have SGI and PADEP addressed economic losses incurred by private landowners whose property adjoins that of SGI?	41	Economy	Please see response to Comment 202 (property value).
215	Did the company address the long-term projections for the market for the type of stone they sell for shingles?	61	Economy	Please see response to comment 204 (asphalt shingles).
216	Is there sufficient evidence that the market for that type of shingles will continue to be there once the company is permitted to expand?	61	Economy	Please see response to comment 204 (asphalt shingles).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
217	<p>The only benefit which can be balanced against all this environmental and social harm is the economic contribution Specialty Granules claims to make. SGI's contribution isn't much. Specialty Granules employs about 150 people. They are 44 on the list of 50 largest companies in Adams County. There are at least three larger employers right in Hamiltonban Township: Ski Liberty, Knouse Foods, World Color Graphics. I'm sure SGI does not buy their equipment or related requirements locally, since these are specialty items for the mining industry. If any businesses are frequented by their employees those would be toward Blue Ridge Summit and Waynesboro. There may be around 20 people from Hamiltonban Township that actually work at the mill. Only 2% of Hamiltonban Township work in the category of Agriculture/Earth Moving/Mining. Before believing any of what SGI says in its SEJ statement facts must be checked. Ask how many people from Hamiltonban Township actually work there. Ask SGI what they actually pay in local taxes. The idea that if they shut down their operations that somehow the local economy would collapse is just laughable, but has always been used to blackmail the Hamiltonban Township to get variances. The main taxes they pay are income taxes to the State, taxes on their \$100-\$200 million profit. All of their property other than active mining sites is recorded as Clean and Green, thus avoiding property taxes.</p> <p>Most people who live in Hamiltonban Township work in sales, administration, management or health care. The economic contribution SGI makes to the community is small and in no way compensates for the removal of Blue Ridge Mountains, the general environmental destruction and the harm to the quality of life and health of the local community.</p>	55	Economy	Please see response to comment 38 (Anti-Degradation Supplement) and 40 (mountain top removal).
218	<p>I have read every page of the Adams County Comprehensive Plan and could find nothing about mining – it is not there, the County Comprehensive Plan does not support SGI in any way. There is also nothing about mining in the Hamiltonban Township Comprehensive Plan. Both plans are all about preserving farms and our natural resources. The Adams County Greenways Plan has a greenway planned for Iron Springs and Lower Gum Springs Road. When SGI quotes the Hamiltonban Township Zoning Plan as supporting mining, they are again being typically deceptive. The quote they use is about Industry in general, by which the Zoning Code means light industry. Mining is only considered Conditional Use. Hamiltonban Township only changed the Pine Hill site to Industrial (with many conditions) from Woodland Conservation under the threat of SGI closing down, as well as immense political pressure from Harrisburg. (paraphrased – Sherry Rogers-Frost written comments)</p>	55	Economy	<p>A conditional use permit was approved by Hamiltonban Township Board of Supervisors on April 1, 2014. The Conditional Use Permit (CUP) can be found in Module 1 of the Northern Tract permit application and Appendix 16.1 of SGI comment response document dated July 3, 2019. The CUP outlines conditions that SGI will be required to follow for the proposed Northern Tract Quarry mining operations.</p> <p>On March 27, 2018, Hamiltonban Township completed a Land Use letter that determines that the Northern Tract Quarry meets the provisions of the local zoning ordinance and has received zoning approval.</p> <p>In a letter dated January 9, 2018, the Adams County Planning Commission (ACPC) determined that the Northern Tract Quarry is consistent with the Adams County Comprehensive Plan. ACPC noted that the Northern Tract Quarry is subject to the CUP with Hamiltonban Township.</p>
219	<p>Property values have been and continue to be depressed by SGI's current operations in the area around the quarry. No, people don't accept that the quarry is already priced into their real estate. Anyone who has owned property around there for more than 25 years has seen their property lose value because of the mining expansion and usually have a very hard time selling it, except to SGI itself. The shift north and enlargement of the operation from West Ridge up to the Pitts Quarry along with all the huge new equipment has ruined the rural quality and beauty of the region. Please don't let that happen again!</p>	55	Economy	Please see response to comment 202 (property value).
220	<p>I'm here to say or acknowledge is SGI has been a corporate partner with the Community Center. And the investments and sponsorships like from last year and really about three years going back. They have sponsored our Halloween party, our Easter egg hunt. The funds that SGI has donated have helped us be able to serve kids in summer, regardless of whether or not they can pay for summer camp.</p>	5	Economy	DEP duly notes this comment.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
221	There was 140 people employed up there, that's just a pinpoint of who all this affects in our area. The contractors, plumbers, electricians, builders, the excavation contractors that work up there. Suppliers and even Lowes in Rouzerville. They're greatly affected by this company. All the vendors and all the supplies that they buy that's all local.	15	Economy	DEP duly notes this comment.
222	They helped us out every opportunity they could. They did help us out when we have issues in our township. And we call them and say we got a problem - we give a phone call or we get somebody that answers the phone right away and we aren't special, we truly aren't special. And if someone doesn't answer the phone right away, we get a returned phone call that day. So they do listen to us and in most cases - well, I'll say in all cases they pay attention to what they say, we work together, usually it's three or four parties that have the issues. They work with us and usually the problem is taken care of.	15	Economy	DEP duly notes this comment.
223	In the last 35, 40 years, we have more than doubled the size of our township. That has put an impact on our township right at the municipal level in Adams County. We are probably the most hurt community when Fort Richie closed, because all the people that lived in Fort Richie and everything, our restaurants, our stores they really took a hard hit. And the last thing we need to do is lose a corporation like SGI.	15	Economy	DEP duly notes this comment.
224	With any issue that we have they get it rectified. It's pretty well taken care of quickly and at no expense to the township residents.	15	Economy	DEP duly notes this comment.
225	SGI disingenuously states that, "The proposed mining project is anticipated to have little effect on residents and visitors of the area except for providing stable employment, good paying job opportunities, and tax revenues ..." Module 24 at 5. SGI's analysis clearly focuses on employment and taxes to the exclusion of the remaining factors, which must also be considered. There are, in fact, many ways that degradation of Tom's Creek would impact the social and economic values that having such a clean and beautiful stream brings to the community.	32	Economy	Please see response to comment 38 (Anti-Degradation Supplement).
226	As a person who owns two homes and lives such a short distance from the mill, I have nothing but gratitude and appreciation for all that SGI does for their neighbors. They are now employing roughly 175 employees, many of which are from here in our own local community. I greatly appreciate the hundreds of thousands of dollars in taxes SGI pays every year, which keeps our tax dollars down.	80	Economy	DEP duly notes this comment.
227	Tom's Creek is also used to create two lakes for the residents of Carroll Valley to use for boating and fishing. Tom's Creek flows through their golf course, also. Finally, it is clear for residents that Tom's Creek and surrounding area is significantly important for tourists and the revenue they bring to the community. Local tourism includes the Monterey Battle Field Group which is in the process of developing a park related to a nearby civil war battlefield. All of these important events and draws for community social and economic benefit would be impacted by degradation of Tom's Creek.	32, 38, 72	Economy	Please see response to comment 38 (Anti-Degradation Supplement).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
228	But I really just want to mention is that they - as a byproduct, they produce a high polished stone that we need in our surface nexus and that's for skid resistance. The state of Maryland mandates it. Pennsylvania does as well. West Virginia does. And were active in West Virginia now as an asphalt producer and we do buy their stone. And previous to them producing this stone, we bought our stone mostly from Virginia. So it's imported one way or the other. I don't know what tonnage we bought last year, but it was fairly significant, probably 15,000 or 20,000 tons. And that throws a lot of Maryland tax money to the local economies here in Pennsylvania and adds to the job base. And it helps us because it's a lot shorter route, there's not as many trucks on the road going down near the metropolitan area around Leesburg. There is just a lot of benefits to us. And I think it is certainly a benefit to the economy.	39	Economy	DEP duly notes this comment.
229	I retired from SGI last December after 43 years. I worked as a quarry supervisor for most of my career. SGI has given me a rewarding career and it's allowed me to provide for my family and my two children. I was able to send both of my children to college and I was able to retire at 62 years old.	52	Economy	DEP duly notes this comment.
230	I've seen the changes that have happened to the community in the last 50 years. And this expansion is just another change. However this one will benefit the community. This expansion will help local residents keep the property taxes low and will provide job security for the people currently employed at SGI.	52	Economy	DEP duly notes this comment.
231	Prospective buyers of houses have decided not to buy in our area when they learn of the quarry and its 24/7 operations and possible expansion. Property values are plummeting. The negative impacts due to lost tax revenue from homeowners and lost opportunities from other businesses related to recreation and tourism (for example) on the local economy are real and growing.	53, 54, 55, 65, 66, 67, 77, 87	Economy	Please see response to comment 202 (property value).
232	Given the unlikely event that SGI would stop operation at a site with millions of dollars of infrastructure and good 15-20 years of solid mineral extraction ahead of it just from the Pitts Quarry, PADEP's approval for this new quarry would only serve to safeguard some future interest of SGI beyond the normal lifespan of the present quarry. The quarry's usefulness to the County and Township as a source of tax revenue, and its job generation should be much longer than this 15-20 year estimate if total reclamation of the current quarries takes place. West Ridge Quarry has been inactive for over 20 years (since 1996) and is still only half completed! If PADEP were to approve this permit solely to protect the profit making interests of a private mining company into some unknown period of the future it would be certainly against all regulations, and probably unconstitutional, given the legislative statutes which define DEP's scope and responsibilities.	55	Economy	Please see response to Comment 3 (West Ridge Quarry). The Department does not consider profit making interests during the review of a surface mining permit application. The application is based on its adherence to regulations and the protection of public health and the environment.
233	We are concerned that the state is privileging corporate profit over the will of the voters and the health, welfare, and safety of the residents of the community and the Tom's Creek watershed. It is clear that the taxpayers of Adams County would not have turned Pine Hill over to the state to become part of Michaux State Forest if they had thought that the state would turn around and put Pine Hill in the hands of SGI to expand its mining operations.	55, 65, 66, 67, 77, 87	Economy	Please see response to Comments 196, 200 (land swap). The Pennsylvania Department of Conservation and Natural Resources determined that the land swap would be to the advantage of State Forest interests, and this position is documented in the Land Exchange Agreement, signed by DCNR on 11/8/2010.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
234	IMPACT ON NEW TOURISM! Our community has three new and exciting tourism venues: Monterey Battlefield Park, Liberty Mountain Resort (recently under new management), and a new Orvis upland shooting plantation. We must support these opportunities for employment and tourist growth. There is nothing compatible between healthful, sustainable tourism and unhealthy, unsustainable surface mining. Hikers, bikers, equestrians, and sporting enthusiasts all seek out healthful, scenic venues, and fresh air. Please view this video to independently assess whether SGI operations are compatible with these activities. https://youtu.be/8iDCaAkFWus	55, 73	Economy	Please see responses to comments 38 (Anti-Degradation Supplement), 207(economy), and 214 (property value).
235	POVERTY! Neighboring property owners are unable to leverage equity because equity is disappearing! This is directly related to SGI operations that depress property values due to nuisances - air, light, and noise pollution - and a limited, fragile aquifer. Homesteading in this area dates back to the 1700's. Families were able to thrive on fresh air, abundant wildlife, and pure water from mountain springs and reliable water wells. Today, many water wells are compromised and residents believe this is directly attributable to blasting and/or water impoundment by SGI. Citizens are being robbed of opportunities to use home equity for higher education or unexpected medical costs, making the cycle of poverty difficult if not impossible to overcome.	73	Economy	Please see responses to comments 137 (well complaints) and 214 (property value).
236	WHO BENEFITS: MEGA CEOS! SGI, or predecessor limited liability companies, point to over nine decades of operations, and yet NO WEALTH has been created in our community. Wealth flows up the executive chain and out of Pennsylvania. Please analyze the SGI payroll and consider whether nonresident, executive pay has any positive impact on our community.	73	Economy	Please see response to comment 202 (property values). SGI engaged an expert economic consulting firm, Consult Solutions, Inc. ("ESI"), to prepare an update to the economic impacts analysis for the Charmian facility. The results of that analysis are presented in the SGI Second Responses, Appendix 3.4. In short, the ESI analyses concluded: (1) Based on SGI's 2018 operations (not including capital investments), SGI generated \$40.2 million in total economic impacts within Adams County and supported 264 jobs (both direct and indirect) and \$19.2 million in wages and salaries. (2) Within the Commonwealth, SGI generated \$60.9 million in total economic impacts and supported 476 jobs (both direct and indirect), \$35 million in wages and salaries, and \$1.2 million in annual tax payments to the state. (3) In 2018, SGI's capital investments generated \$6.9 million in total economic activity in Adams County and supported 37 total jobs and \$1.7 million in wages and salaries. (4) Within the Commonwealth, SGI's capital investments generated \$10.5 million in total economic activity and supported 58 total jobs, \$2.6 million in wages and salaries, and \$130,000 in tax revenue. (5) SGI significantly contributes to local governmental tax revenues. SGI's Charmian plant directly pays local property taxes, its employees pay local earned income tax, and the economic activity generated by its existence leads to additional local tax revenues. In 2018, SGI's Charmian plant paid over \$254,000 in county, township and school district property taxes; and SGI plant employees paid an estimated \$157,500 in earned income taxes to area school districts. For further information, see SGI Second Responses §3.11.
237	RESIDENT FLIGHT AND IMPACT ON TAX BASE! As residents try to escape SGI nuisances, property values plummet. New, lower assessments will be demanded by the residents who cannot afford to escape. SGI stated it pays \$255,000 in taxes, but it is entirely unclear what portion of these taxes flow to support the community. The social and economic study must calculate the Inevitable loss of residential property taxes. There are over 1,500 households surrounding SGI operations. SGI pays a pittance in taxes when compared to the taxes paid by residents. The loss of residential tax resources would drive nails into the coffin of our territory.	73	Economy	Please see response to comments 38 (Anti-Degradation Supplement) and 236 (economy).
238	I'm with the Manufacturers Association of Southcentral Pennsylvania. SGI's employees spend their paychecks locally and support the economic growth of this area, with a local payroll of almost 13 million dollars. SGI was recognized by our association last year, presented with our community investor award for contributions that they made to the local communities. This award was pages in length. It was one of the longest nomination forms we have ever received from our members. SGI supports groups such as the Renfrew Institute, Blue Ridge Fire and EMS, The Penn Mar Youth League, Waynesboro's Hamilton Public Library, and many other civic and social organizations. Today they are actively involved with us in our apprenticeship and other training programs for employees to better develop their job skills and professional training. Among our 370 member companies, and another 110 companies that we interface with for their training and workforce development needs, it's difficult for us to find a company like SGI. SGI believes in providing company paid training to not only better their employees work skills, but in turn deliver a greater economic impact and moral support to their local communities.	85	Economy	DEP duly notes this comment.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
239	SGI's procedures manual specifies that their geologist look for Actinolite and mark it so that they can avoid disturbing it. This is good, but unlikely to be perfect. This does prove that SGI is aware of the danger! That's good. What evidence is there that the methods used by SGI are good enough to prevent the production of toxic waste during the entire process? A more appropriate method would be to do thorough testing of each new batch of debris after blasting or crushing or any other process that could release Asbestiform fibers. When Asbestiform fibers are found the debris should be treated as toxic waste before much of it gets into the atmosphere. Not to mention before the debris is used as road gravel! If there is no toxic waste produced, then these tests will not be expensive. If toxic waste is found the cleanup could be costly. However, if toxic waste is found then the cost of dealing with it should fall on SGI-failure to clean up toxic waste essentially transfers the cost to the workers and neighbors of the mine in terms of serious long-term health effects.	14	Environmental Testing	Please see response to comment 72 (asbestos). SGI collected three 24-hour composite samples from the Charmian Plant Lower Mill Pond 3 (Outfall 001) on May 20-21, June 4-5, and June 12-13 of 2019 for the purpose of analysis for Asbestos using EPA Method 100.2. In addition, SGI collected a dip sample from Pitts Pond 1 for the Active Pitts Quarry on September 18, 2019. The asbestos results are as follows: Charmian Plant -Outfall 001 <3.2 Million Fibers per liter (MFL) on May 20-21, 2019, <0.2 MFL on June 4-5, 2019, and <0.2 MFL on June 12-13, 2019. Pitts Quarry Pond 1 - 0.2 MFL. The Department also collected split water samples with SGI on February 11, 2020 from the upper and lower J stand for analysis for asbestos using EPA Method 100.1. The results for the upper J stand were <1.0 MFL while the results for the lower J stand were <0.52 MFL. The maximum contaminant level (MCL) for asbestos in drinking water is 7 MFL longer than 10 µm. The asbestos results of the samples collected from Charmian Plant Lower Mill Pond 3 (OO1) and Pitts Quarry Pond 1 for asbestos show that the concentration of asbestos is less than the drinking water standard, therefore, there is no reasonable potential for discharges from the existing Pitts Quarry and Charmian Plant or proposed Northern Tract Quarry to contribute to a violation of the drinking water standard for asbestos.
240	However, any attempt to capture airborne fibers is going to be less than definitive. Only water and soil samples, taken in areas of blasting and crushing, will provide meaningful data.	55	Environmental Testing	Please see response to comments 72, 239 (asbestos).
241	DEP or DCNR or another public agency which has staff with the relevant expertise should be regularly testing SGI's waste products for dust that contains hazardous levels of Asbestiform fibers and silica. SGI should reimburse the costs to the agency doing these tests, and this should be a condition of any permit allowing SGI to mine the Northern Tract. (This should also be a condition of continuing to mine, period, but I realize you may not be able to impose retroactive conditions.)	14	Environmental Testing	Please see response to comments 72, 239 (asbestos).
242	As with the hazardous waste issue (asbestos), SGI should not be doing these tests itself rather SGI should reimburse DEP or DCNR the cost of doing these tests. Why is this NOT the standard procedure?	87	Environmental Testing	Please see response to comments 72, 239 (asbestos)
243	It's good that SGI sometimes tests its discharges for various heavy metals and other chemical pollutants, but this is not sufficient. It's indirect, and inconclusive. Since we all care about the ongoing health of the streams-one appropriate, inexpensive, measurement would be to do Benthic Macroinvertebrate counts at a few places on a regular basis. DEP should do this testing upstream and downstream of every place SGI discharges. Both for Toms Creek and for Miney Branch. Just as important, DEP should test upstream and downstream of every place SGI disturbs the runoff that would have gone to Toms Creek. These results should be published, and action immediately taken to correct problems before they become severe.	14	Environmental Testing	Please see response to comment 83 (stream testing).
244	There should be baseline tests done before any disturbance at Pine Hill, and all testing has to be done by people independent of SGI. This is not a criticism of SGI, in fact it would protect SGI from charges of corruption.	14	Environmental Testing	Please see response to comments 72, 239 (asbestos). The collection of data by the applicant in the permit application process is a necessary part of the applicant's site characterization. The data is collected by licensed professionals who attest to the proper collection of the data by signing and stamping the application submission. The Department does collect its own data in an effort to verify the data collected by the applicant, not to conduct our own site characterization.
245	Shouldn't the Department of Environmental Protection insist on independent toxic pollutant testing of the current mining site as well as the property in question for mining expansion?	33	Environmental Testing	Please see response to comments 72, 239 (asbestos), 244 (data collection).
246	SGI's procedures manual specifies that their geologists look for actinolite and mark it so they can avoid disturbing it. This is very good. It's an important step. But it's unlikely to be perfect.	14	Environmental Testing	Please see response to comments 72, 239 (asbestos).
247	A much more appropriate testing method would be to go through testing each new batch of debris after blasting or crushing or any other process that could release asbestiform fibers.	14	Environmental Testing	Please see response to comments 72, 239 (asbestos).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
248	When asbestiform fibers are found in the debris, the debris should be treated as toxic waste before much of it gets in the atmosphere, not to mention before the debris is used as road grout.	14	Environmental Testing	Please see response to comments 72, 239 (asbestos).
249	SGI's proposed monitoring plan is insufficient. While SGI proposes to analyze monitoring samples for some pollutants, important pollutants specific to SGI's operations are not included.	45	Environmental Testing	SGI provided estimated concentrations for the constituents expected to be present in discharges from the proposed Northern Tract Quarry. The estimated effluent characterization data can be found in Module 2 -Section D. Effluent Characterization Item - 27 Other Toxic Pollutants of the Northern Tract Quarry permit application. As noted in Module section 27, the estimated concentrations provided are based on sample analysis collected for the adjacent Pitts Quarry NPDES renewal. The Department uses the effluent characterization data as a screening tool to identify parameters of concern for developing NPDES effluent limits.
250	Testing of SGI's storm water discharge must include tests for metals and other harmful pollutants such as copper, asbestos, selenium, titanium, barium, nitrogen, nitrates, color, etc.	65, 66, 67, 68	Environmental Testing	See response to Comment 249 (effluent characterization). The effluent characterization analysis includes copper, selenium, titanium, barium, nitrogen, nitrates and color. In addition, the operator provided effluent data for asbestos. The results of the dip sample collected on February 7, 2014 from Pitts Pond 1 for the active Pitts Quarry, show that aluminum (0.28 mg/L), barium (0.0079 mg/L), iron (0.34 mg/L), magnesium (8.4 mg/L), manganese (0.012 mg/L), titanium (0.021 mg/L), zinc (0.0067 mg/L) nitrate/nitrite (4.8 mg/L), total organic nitrogen (2.2 mg/L), sulfate (13.9 mg/L), chemical oxygen demand (21 mg/L), phenolics (0.080 mg/L), total kjeldahl nitrogen (2.2 mg/L) and total organic carbon (3.5 mg/L) were present at concentrations greater than the detection limits. The measured concentrations were compared to screening values in order to determine the potential for each constituent to contribute to a violation of the water quality standard in the receiving stream. The screening values utilized are the Criteria Maximum Concentration (CMC) and/or the Criteria Continuous Concentration (CCC). None of the detected parameters were present in concentrations greater than 50% of the water quality criterion. Cadmium, copper, lead, selenium, silver and thallium were not detected, however, the detection limits for these parameters were greater than 50% of the water quality criterion, and in the case of lead and selenium, the detection limit was greater than the water quality criterion. These parameters are not expected to be present in a discharge, however, the operator will be required to collect a confirmatory sample during a discharge event to verify the presence, or lack thereof, of these parameters.
251	Surface water monitoring parameters should now include asbestos and a relook at the acceptable levels of copper.	11	Environmental Testing	See response to Comment 249, 250 (effluent characterization). The effluent characterization analysis includes copper. In addition, the operator provided effluent data for asbestos. The results of a dip sample collected on February 7, 2014 from Pitts Pond 1 for the active Pitts Quarry, show that copper was not detected and reported to be less than laboratory detection limit of 0.005 mg/L or 5 µg/L. The Fish and Aquatic Criteria Continuous Concentration (CCC) for copper is 9.3 µg/L. SGI collected three 24-hour composite samples from the Charmian Plant Lower Mill Pond 3 (Outfall 001) on May 20-21, June 4-5, and June 12-13 of 2019 for the purpose of collecting analysis for Asbestos using EPA Method 100.2. In addition, SGI collected a dip sample from Pitts Pond 1 for the Active Pitts Quarry on September 18, 2019. The asbestos results are as follows: Charmian Plant -Outfall 001 <3.2 Million Fibers per liter (MFL) on May 20-21, 2019, <0.2 MFL on June 4-5, 2019, and <0.2 MFL on June 12-13, 2019. Pitts Quarry Pond 1- 0.2 MFL. The Department also collected split water samples with SGI on February 11, 2020 from the upper and lower J stand for analysis for asbestos using EPA Method 100.1. The results for the upper J stand were <1.0 MFL while the results for the lower J stand were <0.52 MFL. The maximum contaminant level (MCL) for asbestos in drinking water is 7 MFL longer than 10 µm. The asbestos results of the samples collected from Charmian Plant Lower Mill Pond 3 (OO1) and Pitts Quarry Pond 1 for asbestos show that the concentration of asbestos is less than the drinking water standard, therefore, there is no reasonable potential for discharges from the existing Pitts Quarry and Charmian Plant or proposed Northern Tract Quarry to contribute to a violation of the drinking water standard for asbestos.
252	SGI takes precautions against mining and processing actinolite, this of course is a very nasty form of asbestos. If I'm reading this correctly, I want to recognize that SGI has acknowledged that they have found actinolite in some core samples. This segment is found in part seven section three subsection B. And it's planning again, a qualifying action word, and talking about how - how to evade this in part seven section three subsection C. If you take the time to read part seven, it's about five pages long, you might be amazed that SGI or those agencies they hire seem to be doing all the testing here. It seems odd to me. Why doesn't PADEP do the testing?	32	Environmental Testing	Please see response to comments 72 & 239 (asbestos).
253	I'm concerned about what I hear about the testing and the process of the testing. And I think that there should be great transparency and a great effort made to be sure that the testing is independent. And that it satisfies what are today's standards for the testing, that things be looked at very carefully because the issues here on all sides are severely overlooked.	37	Environmental Testing	Please see response to comments 72, 239 (asbestos) and 79, 250 (effluent characterization).
254	SGI's Method of Rock Sampling and Analysis is Inappropriate for the Site: First, the rock sampling and analysis was conducted using inappropriate methods. SGI indicates that they drilled 17 rock cores during the exploration phase of the proposed Northern Tract Quarry area and from these cores, SGI ultimately collected 40 rock samples that were sent for laboratory testing. Appendix 7.1 of SGI's Responses indicates that the laboratory utilized the Environmental Protection Agency's Test Method for the Determination of Asbestos in Bulk Building Materials (EPA/ 600 /R- 93 / 116) [footnote 2], rather than utilizing a method more appropriate for identifying naturally occurring asbestos in rock or soil samples.	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
255	[footnote 2 reads as follows] See EPA Method for the Determination of Asbestos in Bulk Building Materials, EPA/600/R-93-116 (July 1993), available at: http://www.nist.gov/sites/default/files/documents/nvlap/EPA-600-R-93-116.pdf (last visited January 17, 2019)	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
256	The method used by SGI is specifically designed for the purpose of identifying asbestos in bulk building materials such as insulation, acoustic and thermal sprays, pipe and boiler wraps, plasters, paints, etc. It is clear that this method is not suited for evaluating the rock samples collected by SGI and evaluating whether naturally occurring asbestos poses a threat to public health. Rather, FOTC directs the Department to two potential sampling methods that are more scientifically and technically appropriate in this context.	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
257	The California Environmental Protection Agency Air Resources Board has published Method 435 for Determination of Asbestos Content of Serpentine Aggregate.[footnote 3]	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
258	[footnote 3 reads as follows] See California Environmental Protection Agency Method 435 Determination of Asbestos Content of Serpentine Aggregate (June 6,1991), available at: https://www.arb.ca.gov/testmeth/vol3/m_435.pdf (last visited January 17, 2019).	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
259	This method is applicable to determining asbestos content of serpentine aggregate in storage piles, on conveyor belts, and on surfaces such as roads, shoulders and parking lots. The applicability of any particular sampling method is important because it outlines procedures for everything from how to collect samples and the number of samples required to appropriate sample preparation and analytical procedures.	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
260	While Method 435 would likely be more appropriate than the EPA Bulk Building Materials Method utilized by SGI, the EPA has also promulgated a method specifically designed for sampling soils such as the Northern Tract samples. The EPA' s Elutriator Method is a method that is peer reviewed and the best method for determining if soil contains respirable fibers.[footnote 4]	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
261	[footnote 4 reads as follows] See EPA Superfund Method for the Determination of Releasable Asbestos in Soils and Bulk Materials, EPA 540-R-97-028 (1997), available at: https://nepis.epa.gov/Exec/QueryNET.exe/100028RW.TXT?ZyActionD=ZyDocument&Clie=EPA&Index=1995+Thru+1999&Docs=&Query=&Time=&EndTime=&SearchMethod=l&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=O&ExtQFieldOp=O&XmlQuery=&File=D%3A%5Czfiles%5CIndex%20Data%5C95thru99%5Ctxt%5C00000007%5C100028RW.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C&MaximumDocuments=l&FuzzyDegree=O&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&Maximum111Pages=l&ZyEntry=l&SeekPage=x&ZyPURL (last visited January 17, 2019).	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
262	This method also provides results acceptable for risk assessment studies, which should apply at the Northern Tract Site. Soil or bulk material is sieved and then gravimetrically tracked through separation into coarse and fine fractions.	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
263	The fine fraction is tumbled in a sample elutriator and any dust or fibers are liberated into the air within the tumbler and then collected on air cassettes for subsequent transmission electron microscopy analysis. Importantly, the guidance document states "samples are collected in a manner suitable for providing representative measurements of the releasable fraction of asbestos in the matrix sampled."	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
264	Both the California Environmental Protection Agency Air Resources Board's Method 435 for Determination of Asbestos Content of Serpentine Aggregate and the EPA's Elutriator Method are technically more appropriate for investigating and determining if naturally occurring asbestos is present in the metabasalt at the SGI site and at what concentrations.	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
265	Further, the EPA's Elutriator method would actually help provide a risk assessment which could be evaluated to determine potential impacts on human health and the environment.	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
266	Given that naturally occurring asbestos may also be carried by water, FOTC suggests that additional water testing be conducted for this parameter as well.	18	Environmental Testing	Please see response to comments 72, 239 (asbestos).
267	When a small community bands together and finds a way, among themselves, to perform water sampling, and they present to DEP a petition that clearly supports that the designation of Tom's Creek should be upgraded from High Quality to Exceptional Value, DEP should take that seriously, and should not dismiss it for some small technical reason.	83	Environmental Testing	Please see response to comment 154 (existing use).
268	SGI's proposed [water] monitoring plan is insufficient. While SGI proposes to analyze monitoring samples for some pollutants, important pollutants specific to SGI's operations are not included.	11, 18	Environmental Testing	Please see response to comment 249 (effluent characterization).
269	To properly monitor the unique impacts that SGI's operations may have on Tom's Creek, water sampling must also include analysis for asbestos and any chemicals or fungicides used on site. Otherwise, impacts as a result of SGI's operations will go undetected.	11, 18, 45	Environmental Testing	Please see response to comments 249, 250 (effluent characterization).
270	SGI's proposed monitoring plan is insufficient. Important pollutants specific to SGI's operations like asbestos and any chemicals or fungicides used on site are not included.	32	Environmental Testing	Please see response to comments 249, 250 (effluent characterization).
271	What monitoring will be in effect throughout operations, by SGI and PADEP? Frequency of said monitoring?	41	Environmental Testing	The Northern Tract Quarry permit application will utilize a surface and groundwater monitoring program to monitor the water quality surrounding the permit area. This includes monitoring at upstream and downstream monitoring points established on the following streams: Unnamed Tributary to Toms Creek and Toms Creek. In addition, a total of 6 monitoring wells (MW-8D, MW-9D, MW-10D, MW-11D, MW-13D and MW-14D) developed to a depth below the lowest level of mining (740 ft-amsl) and one private water supply (PWS-15A16) will be monitored for both quality and quantity. Four surface water features (DCNR Seep 1, Upper Seep, Pond 1 and Wetland C) will also be monitored for both quality and quantity. The monitoring frequency for the monitoring wells and private water supply will consist of static water elevations (SWL) will be collected from each perimeter monitoring wells on a quarterly basis during initial development of the Northern Tract Quarry. Once the Northern Tract Quarry advances below an elevation of 1050 feet, the monitoring frequency for the perimeter monitoring wells SWL measurements will accelerate to monthly. All monitoring wells will be required to have a minimum of one annual sample collected for quality purposes.
272	There has not been adequate testing for naturally occurring asbestos (which is present in greenstone) in the air, water and soil around the current quarry. Naturally occurring asbestos is a human carcinogen. These tests must be carried out properly and by an independent party – perhaps DEP or the EPA.	55, 65, 66, 67, 77, 87	Environmental Testing	Please see responses to comments 239 (asbestos) and 250 (effluent characterization).
273	Testing of SGI's storm water discharge must include tests for metals and other harmful pollutants such as copper, asbestos, selenium, titanium, barium, nitrogen, nitrates, color, etc.	55, 65, 66, 67, 77, 87	Environmental Testing	Please see response to comment 250 (effluent characterization).
274	Why should the focus be just on the creek ? There are square miles of destruction going on all around us.	6	Forest	Please see response to comment 11, 31 (reclamation), 276 (natural diversity)
275	Our mountains, rich in greenstone, are among the oldest in the world. As part of your review of SGI's social and economic justification to destroy Pine Hill, what price tag will you assign to the loss of our prehistoric Green Giants?	32	Forest	Please see response to comment 276 (natural diversity). The Social or Economic Justification process is based on the classification of the receiving stream, and the review of these applications largely focuses on potential stream impacts.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
276	<p>The site resides within the area of the South Mountain Initiative/ South Mountain Partnership. Both the PA State Initiative, and its action Partnership strive to preserve the forested wealth and healthy streams in this area. The South Mountain Initiative is one of seven State recognized areas of special conservation value. https://www.dcnr.pa.gov/Communities/ConservationLandscapes/SouthMountain/Pages/default.aspx</p> <p>This site was supposed to become part of Michaux Forest. Rothrock, who is the father of forestry in Pennsylvania, created state forests around watersheds, understanding the interrelationships of nature, and Michaux was the first. There is a sad irony that this destructive quarry exists so close to Mont Alto, the first forestry school, and almost touching the first PA State Forest.</p> <p>This area is part of the Michaux State forest Culp's Hill LMU (Land Management Unit), known for its rich flora and fauna. Many threatened and endangered species exist within this LMU. http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr_20033649.pdf</p>	55	Forest	SGI followed appropriate Department guidance and screened its proposed site through the Pennsylvania Natural Diversity Index (PNDI). The PNDI screening tool includes species of interest to the Pennsylvania Game Commission, Pennsylvania Department of Conservation and Natural Resources, Pennsylvania Fish & Boat Commission, & United States Fish & Wildlife Service. SGI ran this report and submitted the results to these agencies on December 8, 2015. The PNDI report remains valid for 2 years. SGI ran the PNDI report again on March 29, 2019 to account for this time frame. SGI completed the required consultation with all agencies referenced in the PNDI and received the necessary clearances from each. Impacts to forests or species of special concern are addressed through the PNDI process.
277	We are shocked by the prospect of the destruction of the mountain which was once part of protected Michaux State Forest by the expansion. We are also profoundly concerned by the recent notice that the expansion will disturb a seam of carcinogenic asbestos which will be released into the air we breathe. Even a minimal exposure would be a severe threat to the health of nearby residents as well as visitors and tourists. We understand Pennsylvania officials are aware of this threat and that the extent of the danger has not been determined by proper testing.	79, 87	Forest	Please see response to Comments 72, 239 (asbestos).
278	Stripping Pine Hill would create a huge crater where the beautiful wooded area is now. This will greatly reduce the value of our property.	53, 54	Forest	Please see response to comment 212 (post mining impoundment) and 214 (property value).
279	What becomes of the trees that will be harvested if the permit is granted in the near future? DCNR was to get the proceeds from any timbering of this land required to do the mining. As a special request, I would offer to make a monumental table from one of the largest pines to be cut. This I would donate to the citizens of Adams County to be used in one of their schools or public buildings. Please consider forwarding this request to someone within DCNR who has the ability to make something like this happen. (paraphrased – Bruce Kimball written comments)	36	Forest	Your comment is noted and was forwarded to SGI for consideration.
280	I urge you to align yourself with the good guys on this issue. Use your authority to keep (SGI, or 'Specialty Granules') from effecting their destructive plans. SGI has applied for permits which would permit taking the top off Pine Hill, a former tree farm. They would then cut down the trees and remove the rock and topsoil, clearing the way for mining within 300 feet of the center line of Tom's Creek, a pristine trout stream.	48	Forest	The proposed Northern Tract Quarry includes a 300 foot vegetated riparian buffer from the center line of Toms Creek and the Unnamed Tributary to Toms Creeks as per the Hamiltonban Township Conditional Use Permit (CUP). The CUP buffer is shown on the Exhibit 9: Operations Map for the proposed Northern Tract Quarry.
281	<p>As noted in the Princeton Hydro Report, the PA Game Commission has identified Adams County as summer habitat for federally endangered and state protected and endangered Indiana Bat (<i>Myotis sodalists</i>). While SGI conducted mist net surveys to identify the presence and evaluate potential impacts to these species, it is clear that additional sampling is necessary.</p> <p>The Princeton Hydro Report states that, "[t]he mist netting was done in early-mid October targeting the copper mine. Since Adams County is documented summer range, and the woodland habitat that SGI will deforest for mining activity would support Indiana bat roosting habitat, we would urge more sampling to be done within the property boundary in the summer months."</p>	32	Flora and Fauna	SGI has coordinated with both the Pennsylvania Game Commission and the U.S. Fish and Wildlife Service (USFWS) in regards to the endangered Indiana Bat (<i>Myotis sodalists</i>) and threatened northern Long-eared bat (<i>Myotis septentrionalis</i>). As noted in your comment, SGI has completed a mist-net survey on three consecutive nights between October 7 and 14, 2017 at the abandoned copper mine entrance located within the proposed Northern Tract Quarry permit area. The USFWS has reviewed both the mist-net survey and concluded that the Service does not expect adverse effects to hibernating bats from the proposed Northern Tract Quarry and recommends confining any tree removal activities to the winter months (November 15 through March 31) to avoid impacts to both the Indiana and northern long-eared bats. SGI has proposed to restrict all tree removal to winter months (November 15 through March 31).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
282	Module 1, USFWS/PFBC Bog Turtle Habitat Evaluation Field Forms, Appendix D- The information used in this bog turtle survey was from a field visit made on December 8, 2015, approved May 11, 2016 and is now over two (2) years. The BT survey 12/8/2015 cites any information therein is only valid for two (2) years and fails to address parcels containing stream/drainage ditches from adjoining properties, as well as any direct and /or indirect impacts on any wetlands, forested wetlands, etc. therein.	59	Flora and Fauna	SGI has completed an updated Pennsylvania Natural Diversity Inventory (PNDI) on March 29, 2019 and coordinated with each agency to confirm the previous PNDI communications regarding potential effects on federally listed species. The USFWS confirmed that the agency's comments as detailed in their April 2, 2019 and January 19, 2018 letters remain unchanged. The April 2, 2019 letter from the U.S. Fish and Wildlife Service, confirms the Departments conclusion with respect to the new information regarding bog turtles in proximity to the proposed project, that no direct or indirect adverse effects to the hydrology of the offsite wetland habitat supporting bog turtles are anticipated from the proposed Northern Tract Quarry.
283	Module 1, USFWS/PFBC Bog Turtle Habitat Evaluation Field Forms, Appendix D- A separate data form is required for each wetland within the project action area. (Phase 1 Bog Turtle Habitat Survey Data Form for the Northern Population Range October 26, 2018 Supplemental Information): There area 3 forms total submitted for the five (5) wetland sections A, B, C, D, and E. Wetlands A and C are both combined on a single form at page 155, and wetlands B and E are both combined on a single form at page 157	59	Flora and Fauna	The Department has consulted with the USFWS in regards to combining wetlands B and E on the Phase 1 Bog Turtle Habitat Survey Data Form. The USFWS contacted the Qualified Bog Turtle Surveyor concerning the combining of wetlands B and E. The Qualified Bog Turtle Surveyor stated "they were grouped together due to their similarity of location, landscape position, and sources of hydrology and character". The USFWS stated that, "while not typical, the Service concurs with this approach" in an email dated October 9, 2019 to the Department.
284	Module 1, USFWS/PFBC Bog Turtle Habitat Evaluation Field Forms, Appendix D- I observed the wetlands in the SGI tract, walking along both sides of Iron Springs Road on January 26, 2019 and observed the following: There are two (2) culverts running under Iron Springs Road with small surface streams, with a smaller road drainage ditch flowing into the stream on the immediate east side of the largest culvert. This seems to be the stream referred to as Channel 1 downstream in the Northern Tract parcel it is not shown in any BT survey12/8/2015 documents; this surface stream flows through the culvert and into SGI property approximately 300 feet south of the southeast corner of the SGI Northern Tract along Iron Springs Road; it continues to flow into wetlands E, D, C, B, and A downstream through the Northern tract property. (Attachment 1) This stream had a standing pool approximately 4-6" deep and 10 feet long on the west of the culvert flowing into SGI property and with mucky soil bottoms on January 26, 2019, with adjoining mixed swale fields and steep forested hillsides across from the SGI Northern tract property. (Attachment 2) There should be additional consideration involving wetlands information submitted for Large Surface Mining Permit No. 01180301 and NPDES No. PA0279617, as any direct or indirect impacts adjacent to the SGI Northern tract are not addressed nor provided for this application. (See Stephen Roy 2/12/2019 PDF for attachments)	59	Flora and Fauna	Please see response to comment 282 (bog turtle survey).
285	Pine Hill (SGI's Northern Tract) encompasses the headwaters of Toms Creek and its tributaries, all Chapter 93 Designated Streams, in a specially protected watershed. This was Toms Creek's existing use and Pine Hill's existing use, to shed its water into Toms Creek. The hydrology cannot be permitted to be so permanently damaged. These are HQ trout waters! The hydrology alteration will adversely affect the existing wetlands. ENDANGERED Nodding Trillium habitat will be lost at the very least, and probably Bog Turtle habitat as well. Alterations in hydrology will also affect the human neighbors who have a right to the existing use of their wells. Water . Enough for the trout too??? Enough to support the exceptional macro-invertebrates counted twice each year by volunteers from the Friends of Toms Creek?	73	Flora and Fauna	Please see responses to comments 80 (stream flow loss), 286 (bog turtle survey), and 291 (nodding trillium).
286	Bog Turtles- Was PROPER PROTOCOL observed during the search for these elusive ENDANGERED turtles? If not, it should be re-investigated! The turtles had the "existing use" of these wetlands.	73	Flora and Fauna	Representatives from the United States Fish & Wildlife Service, Pennsylvania Fish & Boat Commission, and the Department confirmed the presence of a Bog Turtle (<i>Glyptemys muhlenbergii</i>) near the proposed Northern Tract Quarry area. For the protection of the individual and species in general, the exact location of the turtle will not be made public. The Bog Turtle is listed as endangered in 58 PA Code Chapter § 75.1. 25 PA Code Chapter § 105.17 indicates that any wetland that serves as habitat for a species listed as threatened or endangered, and all wetlands hydrologically connected to or located within ½ mile of these wetlands, and that maintain the habitat of the threatened or endangered species within the wetland will be designated exceptional value. The location where the Bog Turtle was found near the proposed Northern Tract Quarry is designated as exceptional value for this reason, however it was determined by representatives from the PAFBC & the Department that the wetland where the Bog Turtle was found is hydrologically isolated from the proposed Northern Tract Quarry location. USFWS confirmed their agreement with this determination in a letter dated April 2, 2019. As such, the proposed mining activities associated with the proposed Northern Tract Quarry will not affect the Bog Turtle or the wetland habitat where it was found.

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
287	Bats- My mind also keeps coming back to the bats. The PA Game Commission has just reclassified three species of bats from THREATENED to ENDANGERED: Northern Long-Nosed Bat, Tri-Colored Bat and Little Brown Bat., all decimated by white-nose syndrome in PA. I request an updated consultation with the PA GAME COMMISSION, required for projects within 300 meters of a hibernaculum or summer roost (here you can read "forest") locations. New hibernacula and summer maternity sites have been added to PNDI or PNHP. I understand that PNDI certificates expire after 2 years. Therefore it is time for a new look at the bats. I request that these investigations be carried out at the proper seasons with PROPER PROTOCOLS by independent observers. The bats had the "existing use" of Thaddeus Stevens' old copper mine.	73	Flora and Fauna	Please see response to comment 281 (bat survey).
288	SGI's answers to the ANTIDegradation and the SOCIAL AND ECONOMIC JUSTIFICATION sections are stunningly inadequate recompense for: The Tri-Colored Bat is now considered threatened in PA, and soon will be on the U.S. endangered list. Also witness to bog turtle from hearing and the fact that it has been two years since original survey: the critical species survey needs to be done again.	55	Flora and Fauna	Please see responses to comments 281 (bat survey) and 286 (bog turtle survey).
289	Does every rock, tree and bird derive it's value from whether or not it is beneficial to human beings? Is everything simply a natural resource to be cut down or mined or eaten or do all inhabitants of the planet have a value in and of themselves? Perhaps we should consider this possibility. Maybe the tree or fish or bird has a value of its own apart from us. When you walk in Michaux or at Strawberry Hill or a Carroll Valley Park, do you see and hear and feel that there's more to these spaces you're walking through than a usefulness to us. When we take the time to look at what's around us, until we actually see it, or to listen until we actually hear, and we become aware of the intrinsic value of nature. If you can accept that possibility, it will cause you to think differently.	82	Flora and Fauna	See response to Comment 1 (permit application review). More specifically, the purpose of the Non Coal Act is to have industry proceed in manner that "improve[s] the use and enjoyment of the lands," "enhance[s] land use management and planning," "enhance[s] the value of the land for taxation," while protecting "birds and wildlife," "aid[ing] in the prevention of pollution of rivers and streams," "protect[ing] water supply," and "eliminate[ing] hazards to health and safety." 52 P.S. § 3302.
290	I observed a bog turtle down on route 16 near Lake May squashed by a car. It's a pretty distinctive turtle. It's North America's smallest turtle. This thing is much endangered. I didn't see any mention where there was any survey done for this. And I traveled up and walked along Iron Springs Road, up by the wetlands that are in peril that are going to be destroyed by this project.	59	Flora and Fauna	Please see response to comment 286 (bog turtle survey).
291	Will the endangered Nodding Trillium have its proper habitat properly watered to insure its survival.	73	Flora and Fauna	The Nodding Trillium (Trillium cernuum) has no current legal status protection (17 Pa. Code Chapter 45; 17 Pa. Code §§ 45.13, Pennsylvania Threatened; 45.14, Pennsylvania Rare; and 45.21, Tentatively Undetermined). The United States Department of Agriculture (USDA) and USFWS 'Wetland Indicator Status' for Nodding Trillium is listed as "Facultative-Wet", indicating its preference for moist soils. A requested survey was completed in 2012 (AECOM) for the plant over the proposed Northern Tract and 'redelineated' by a current consulting firm (Skelly & Loy) in 2016 showing most of the population outside of the actual proposed active mining area. Of 1,522 individual plants surveyed, 18 were found to be in the "Operational Buffer" area where disturbance activities would likely kill them. The remaining plants are located near wetlands or moist forests within the maintained buffer area (protected). SGI completed required consultation with the Pennsylvania Department of Conservation and Natural Resources (DCNR), and in response letters dated September 26, 2016 and August 1, 2017 DCNR concluded that no impact to the existing Nodding Trillium population is anticipated as a result of the proposed project. SGI has currently proposed to monitor the hydrology of the wetlands, to maintain their current status. Should a wetland become damaged or destroyed by their activities, the Department can require a mitigation wetland to be constructed nearby. The prospect of relocating individual Nodding Trillium plants has not been discussed at this point.
292	I am aware that bats were found in Thaddeus Stevens' copper mine. Even though none were the endangered Indiana Bat, I remain concerned for the loss of the existing bats' habitat. I wish that SGI was required or self-motivated to provide some alternative bat habitat.	73	Flora and Fauna	Please see response to comment 281 (bat survey).
293	Under 25 Pa. Code § 77.126(a)(10), a permit application may not be approved for noncoal surface mining activities unless the applicant affirmatively demonstrates that "[t]he proposed activities [will] not affect the continued existence of endangered or threatened species or result in the destruction or adverse modification of their known critical habitats."	32	Flora and Fauna	Please see response to comment 276 (natural diversity).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
294	Proposed protection of identified endangered plant Trillium Cernuum (Nodding Trillium) is insufficient to ensure protection of the plant species. The Department should further require additional protections for the Nodding Trillium found between the maintained and operations buffer, such as increasing the maintained buffer, to ensure adequate habitat for the endangered plant.	32	Flora and Fauna	Please see response to comment 291 (Nodding Trillium).
295	Has a study been issued revealing the presence of any endangered animal or plant species on SGI's property?	41	Flora and Fauna	Yes. Please see response to comment 276 (natural diversity).
296	What ecologically sensitive studies have been done about the mining operations affect on the living environment of animals, amphibians, reptiles, trees, fauna, flora, natural heritage plants, and endangered species?	41	Flora and Fauna	Please see response to comment 276 (natural diversity).
297	The Department of Conservation of Natural Resources (DCNR), under Natural Resources, Article 8, Title 17, Chapter 45 is responsible for plotting properties for threatened, rare or endangered species. Have they received a report from SGI?	41	Flora and Fauna	Yes. Please see response to comment 276 (natural diversity).
298	If SGI is allowed to strip the mountain, the wildlife that lives there will be forced out of their habitats. This could pose a threat to both animals and homeowners as these animals are pushed closer to residential areas.	53, 54	Flora and Fauna	Please see response to comment 276 (natural diversity). The commenting agencies did not express concern about wildlife displacement and increased human/wildlife interaction.
299	The very rare plant, Nodding Trillium, could not survive in such a parched environment. If you look at the map provided by the biologist showing where these special plants exist, you will see that their colony surrounds the bottom of the mountain. This is where water naturally collects and provides the continually moist and rich habitat necessary for the Nodding Trillium. The colony is described by the biologist as the largest in the state. Nodding Trillium also required heavy shade so merely fencing them off will also kill them unless enough forest buffer is allowed to remain.	55	Flora and Fauna	Please see response to comment 291 (Nodding Trillium).
300	Kepner's Knob, a mountain right across from Pine Hill to the northwest is a designated rare species area. If it weren't for the closeness of the Pitts Quarry it is very possible Pine Hill could also be in this category.	55	Flora and Fauna	Please see response to comment 276 (natural diversity).
301	Princeton Hydro notes that additional sampling data is also necessary for the Timber Rattlesnake and the Bog Turtle. While SGI determined that potential rattlesnake habitat is low within the area of disturbance, the testing only occurred on four occasions from April-May rather than the warmest months of the year when foraging and basking activity would be greater.	32	Flora and Fauna	Please see response to comment 276 (natural diversity).
302	Similarly, the report put together by Skelly and Loy for SGI concludes that the property would not support typical bog turtle habitat conditions. Yet the photos taken do indicate the presence of supporting vegetative structure for Bog Turtle habitat and Princeton Hydro suggests that a Phase II survey is warranted.	32	Flora and Fauna	Please see response to comment 286 (bog turtle survey).
303	In regard to Nodding Trillium species, Princeton Hydro concludes that the number of plants affected by Mine Expansion is much greater than SGI anticipates. This is due to the fact that more than half of the existing contributory drainage area to two hillside associated wetland habitats will be removed as a result of mine expansion. "If the 2 wetlands are altered, then the tributary to Tom's Creek and the Nodding Trillium population will experience much more detrimental effects from Quarry development."	32	Flora and Fauna	Please see response to comment 291 (Nodding Trillium).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
304	<p>Other tests by SGI have also not followed protocols and should be carried out by independent parties: surveying for bog turtles, timber rattlesnakes, Indiana bats and other threatened/endangered species of flora and fauna on Pine Hill which need to be done at the proper times of year in the proper ways to yield accurate data.</p> <p>Testing of macroinvertebrates and other aquatic life in Tom's Creek must be done to ensure that this pristine trout stream is protected by the most stringent standards – also by an independent entity.</p> <p>The wetlands of Pine Hill which support fragile flora and fauna, including owls, bats, bears and foxes known to inhabit the dense forests of Pine Hill, and an endangered colony of Nodding Trillium, a plant now extinct in Ohio.</p>	1, 2, 3, 42, 46, 47, 51, 55, 62, 63, 64, 65, 66, 67, 68, 71, 73, 74, 77, 84, 86	Flora and Fauna	Please see responses to comments 97 (stream survey), 122 (wetlands), 276 (natural diversity), 281 (bat survey), and 286 (bog turtle survey).
305	And what if the monitoring shows significant damage to the Nodding Trillium colony and/or the wetlands (where there may very likely be bog turtles)?		55 Flora and Fauna	Please see response to comment 291 (Nodding Trillium).
306	This would allow blasting and excavation within 300 feet of Tom's Creek and near wetlands containing unique and endangered species. The largest colony of rare nodding trillium in PA is near the proposed blasting site and would likely be destroyed by the mining activity.		71 Flora and Fauna	Please see response to comment 291 (Nodding Trillium).
307	In its application SGI failed to identify "historic places that maybe adversely affected by the proposed operations." Nor did SGI "describe the measures to be used to minimize or prevent these impacts and meet the requirements of this title." 25 Pa. Code §77.464.		32 Historic	Please see response to comment 35 (historic).
308	I would like to say that I am in favor of the mine expansion because there is a need in our society today to retain the existing jobs and provide jobs for in the future. I understand that the Confederates 150 years ago retreated back to Virginia on Gum Springs Road but they also retreated on Route 30, Route 11, Jacks Mountain Road and many others. That doesn't make them historical roads. SGI has been a good neighbor to the community for a very long time and I hope they will continue to be with this expansion. Even though I am in favor of this expansion I also feel that is the DEP's responsibility to do whatever is necessary to keep Toms Creek a pristine trout stream.		60 Historic	Please see response to comment 35 (historic).
309	The proposed Northern Tract Quarry application's archeological review is insufficient as it fails to address impacts to significant civil war historical sites, namely the Confederate Army's retreat path.		78 Historic	Please see response to comment 35 (historic).
310	The Confederate Army Retreat Path, which has received national recognition, was not mentioned at all in SGI's permit application. This is a glaring omission.		73 Historic	Please see response to comment 35 (historic).
311	SGI failed to identify two known historic places (Module 10.13) that would be impacted by SGI's proposed removal of Pine Hill and failed to assess the impacts of expanded surface mining on these two historic places. (Monterey historic district and July 4-5, 1863 Civil War retreat)		32 Historic	Please see response to comment 35 (historic).
312	SGI's archeological review is insufficient as it failed to address impacts to significant Civil War historical sites. The Department is urged to require an independent archaeological assessment of the permit site and/or engage in further consultation with the Pennsylvania Historical and Museum Commission to fully assess the impact upon important historical resources.		32 Historic	Please see response to comment 35 (historic).
313	Pine Hill also has significant historical value with respect to the Civil War. This area should be preserved with the same care as the Gettysburg battlefields.		53, 54 Historic	Please see response to comment 35 (historic).
314	How could the application show an NA response to the historic factor?		61 Historic	Please see response to comment 35 (historic).
315	What are the standards regarding historic environmental preservation?		61 Historic	Surface mining permit applicants are required to consult with the Pennsylvania Historic and Museum Commission (PHMC) regarding historic preservation. Please see response to comment 35 (historic).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
316	Is there sufficient evidence that the historic environmental preservation clause of the constitution does not apply to this requested expansion?	61	Historic	Please see responses to comments 35 and 315 (historic).
317	The Confederate Army retreated from the Battle of Gettysburg along the roads surrounding the base of Pine Hill. This important historical event, which has received national recognition, was not mentioned at all in SGI's permit application. This is a glaring omission.	1, 2, 3, 21, 23, 24, 26, 54, 51, 55, 56, 57, 58, 59, 62, 63, 64, 65, 66, 67, 77, 84, 87, 88	Historic	Please see response to comment 35 (historic).
318	The Department should delay acceptance of the application until an archeological evaluation is conducted and evidence presented regarding the scenic and historic impact of the proposed mining on The Great Wagon Way and Confederate Army Retreat Path. We also ask that the review and results be made public with sufficient time for a response.	88	Historic	Please see response to comment 35 (historic).
319	DEP's lack of diligence in following up with other agencies such as PHMC when they make recommendations for further investigation. The historical nature of the area around Pine Hill (the ~20 mile long wagon train of confederates retreating from Gettysburg through the narrow Fairfield Gap) was not known by PHMC, but they recommended archaeological investigation which would probably have found the remains of the wagons which when broken were just pushed off the Retreat Trail.	55	Historic	Please see response to comment 35 (historic).
320	As the Department reviews this application, we ask that you give thorough consideration to the possible impact that an expansion of mining operations could have on extant historical resources in this area, including the Monterey Historic District, Monterey Pass battlefield, and the retreat path of General Robert E. Lee's Army of Northern Virginia following the July 1863 Battle of Gettysburg. To ensure a duly comprehensive evaluation of any potential effects, we recommend that you consult directly with the Pennsylvania State Historic Preservation Office, National Park Service's American Battlefield Protection Program, as well as local experts and historians to accurately identify historic resources in the project area and consider appropriate avoidance, minimization, and mitigation measures based on the project's proximity to any such resource.	61	Historic	Please see response to comment 35 (historic).
321	Although I am deeply concerned about the negative impact the surface mining plan will have on the environment near our home, I am also well aware that this work will destroy an important historic site - one that has already been designated appropriate for inclusion on the National Register of Historic Places. The area's role in the Confederate Army's retreat from Gettysburg has been well-documented, for example, in Kent Masterson Brown's book <i>Retreat from Gettysburg</i> and John A. Miller's <i>The Battle of Monterey Pass</i> . The retreating Confederate wagon trains and soldiers who traversed Pine Hill, Gum Springs Road and the Maria Furnace Road on their long journey to Virginia met up with Union Calvary under General Judson Kilpatrick at Monterey Pass. Historic topographical maps illustrate "Pine Mountain's" close relationship to the second largest battle in the state of Pennsylvania on July 4-5, 1863. Once SGI is permitted to mine this area, the environment will no longer give historians the chance to explore the path of the retreat in its current undisturbed state. Interest in the retreat and the battle is growing, as our local historical society recognized a couple of years ago when it built a new museum nearby that focuses on the Battle of Monterey Pass.	69	Historic	Please see response to comment 35 (historic).
322	Viewshed analysis and review of historic and cultural resources also need to be done at the proper time of year in the proper way by an independent entity. There is ample documentation that the Confederates retreated from the Battle of Gettysburg along Iron Springs and Gum Springs Roads, around the base of Pine Hill.	12, 13, 42, 47, 65, 66, 67, 68, 71, 73, 74, 84, 86	Historic	Please see response to comment 35 (historic).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
323	<p>The National Historic Preservation Act was first passed in 1966. Had predecessor companies operating under PA DEP permits followed the law, it is likely that the archaeological resources from a major Civil War skirmish that occurred at the current location of SGI gates might have been identified and preserved. Alas, the law was ignored and that historical place is lost forever.</p> <p>It is submitted that it would be appropriate to suspend issuance of all future permit applications and revoke current permits until SGI recognizes the important historic places impacted by its operations, including the Historic Monterey District (listed on the National Register of Historic Places), the Thaddeus Stevens copper mines, the Great Wagon Road, and the Civil War July 4-5 Retreat Path (documented as having traversed across Pine Hill along Iron Springs and Gum Springs roads). SGI has flouted the application of the National Historic Preservation Act, and that flouting should be treated as a "continuing violation" under the above-referenced statute, 25 Pa. Code § 77.126(a)(6), as well as a failure to comply with 25 Pa. Code § 77.464 pertaining to protection of historic places.</p>	32	Historic	Please see response to comment 35 (historic).
324	In the event PA DEP takes the position that the overlay of federal historic preservation laws does not apply herein, the remedy for ordinary citizens, like myself, is to petition directly to the U.S. Department of Environmental Protection to revoke the Commonwealth's delegated NPDES authority.	32	Historic	Please see response to comment 35 (historic).
325	IMPACT ON HISTORIC, CULTURAL, AND NATURAL RESOURCES! Unique assets encircle Pine Hill, the location which SGI will destroy. The historic assets include the Great Wagon Road, the July 4-5, 1863 Civil War Retreat Path, and an abandoned copper mine which supports a variety of wildlife, including tri-colored bats. Thaddeus Stevens, Pennsylvania's most famous abolitionist, sought to extend the nearby tapeworm railroad to Pine Hill and onward to Monterey. The archaeological remnants of this fascinating history can still be seen at the junction of Charmian and Furnace Roads. Sadly, and in contravention of existing historic preservation law, SGI predecessor companies failed to identify and protect important historic assets, including a Civil War skirmish site that occurred at the location of its processing plant.	55, 73	Historic	Please see response to comment 35 (historic).
326	SGI's Application Must be Denied Because SGI's Socio-Economic Justification was Approved without Public Participation and SGI Failed to Properly Assess Impacts to Tom's Creek as a Result of Proposed Discharges	45	Public Welfare Issues	The SEJ submitted by SGI will only be formally approved if the permit application is approved. Public hearings were held to solicit public input on the entire permit application, including the SEJ, on July 23, 2018, and on January 30, 2019 (one of the primary reasons for the scheduling of the January 30, 2019 public hearing was to address concerns regarding public participation in the SEJ process). The inclusion of comments and corresponding responses in this document pertaining to the SEJ submitted by SGI is evidence of that public participation process. See response to comments 79 (effluent characterization), 126, 271 (surface water monitoring).
327	A branch of Tom's Creek runs through my community on its way to the Maryland border and the Chesapeake Bay. Also, close to my community is a community called Greenstone, within which a greenstone mill is located, known colloquially as "the grit mill." One can see the large clouds of smoke belching from the mill from quite a distance. Most assuredly, the lovely streams around here are polluted from mill runoff.	9	Public Welfare Issues	<p>Please see responses to comments 390 (dust), 428 (silica) and 431 (risk). Per a 3/10/20 email from SGI, "Greenstone is a small unincorporated community located adjacent to our facility. Indeed our facility is known colloquially as "the grit mill". I am confident that the "smoke" described in your email is in fact steam. Throughout our manufacturing process we heat the base rock to dry it and to obtain desirable characteristics for our customers. Afterwards, the material is cooled using water to lower its temperature by hundreds of degrees. Obviously, this process produces a fair amount of steam which can be seen from no less than 3 locations along the way nearly every day. We utilize natural gas as a fuel and I am not aware of any other combustion process onsite that would produce any significant amount of smoke." DEP concurs with this evaluation. The water quality of the Unnamed Tributary to Toms Creek is represented by monitoring points SS-CHN1-US and SS-CHN1-DS. The water quality of background samples collected from the Unnamed Tributary to Toms Creek range in pH from 6.4 to 7.7 Standard Units (S.U.), temperature from 2.5 to 21.4 degrees Celsius (°C), Iron concentration from ND to 0.30 mg/L, Manganese concentration from ND to 0.02 mg/L, Aluminum concentration from ND to 0.18 mg/L, Sulfates concentration from 3.7 to 8.0 mg/L and Total Suspended Solids concentration from ND to 19 mg/L. The water quality of Toms Creek is represented by monitoring points SS-TC-US and SS-TC-DS. The water quality of background samples collected from Toms Creek range in pH from 6.3 to 7.7 S.U., temperature from 2.3 to 22.3 °C, Iron concentration from ND to 0.67 mg/L, Manganese concentration from ND to 0.02 mg/L, Aluminum concentration from ND to 0.14 mg/L, Sulfate concentration from 2.8 to 6.8 mg/L, and Total Suspended Solids concentration from ND to 7 mg/L. The quality of both Toms Creek and the Unnamed Tributary to Toms Creek exhibit low metal, total suspended solids and sulfates concentrations.</p> <p>In addition to the water quality provided with the Northern Tract Quarry application, surveys of Toms Creek were conducted in 2011 and 2014, both indicating that the existing use of High Quality – Cold Water Fishes is appropriate. These surveys support that the quality of Toms Creek has not been degraded by the active Pitts Quarry and Charmian Plant operations.</p>

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
328	We write to request your urgent attention to Permit No. 01180301, and related permits, by Specialty Granules, LLC, hereafter SGI, that seeks to expand large surface mining of greenstone - an ultra-mafic rock that contains concentrations of copper and other potential contaminants, including asbestos-into a "specially protected watershed" area.	9, 17	Public Welfare Issues	Please see responses to comments 239 (asbestos) and 250 (effluent characterization).
329	HEALTH: Mining greenstone, which SGI suggests is inert and harmless, presents an unacceptable level of health and environmental risks due to toxins and contaminants, including copper, silicates, and naturally occurring asbestos.	9	Public Welfare Issues	Please see responses to comments 239 (asbestos) and 250 (effluent characterization).
330	The pollution of an HQ stream with sediment which will carry some percentage of toxic asbestos and change the stream's bottom contours by filling it up with silt (this is what has happened to Miney Branch)	55	Public Welfare Issues	Please see response to comment 83 (stream testing).
331	If permitted, the project will blast and excavate right next door to residential properties, within 100 feet of scenic, historic roads, and within 300 feet of Tom's Creek and four ecologically-diverse wetlands containing unique and endangered species.	9, 35	Public Welfare Issues	Please see responses to comments 7 (blasting), 35 (historic), 122 (wetlands) and 276 (natural diversity).
332	Nearby Miney Branch, an unhealthy stream, is proof of SGI's degradation of water resources and downstream pollution. Green grit and sludge have buried the natural cobble that is necessary to support macroinvertebrates, fish, and other aquatic life. The green grit and sludge are not life sustaining for any form of life.	9	Public Welfare Issues	Please see response to comment 83 (stream testing).
333	Usually these industries leave environmental cleanup to the municipality or the state. In the case of a surface mine which is contaminated with actinolite asbestos, the cleanup could easily end up as a Federal responsibility (i.e. Superfund).	55	Public Welfare Issues	Please see responses to comments 5 (bonding), 9 (legal requirements) and 239 (asbestos).
334	Today, many water wells are compromised and residents believe this is directly attributable to blasting and/or water impoundment by SGI.	9	Public Welfare Issues	Please see responses to comments 121 (hydrology) and 178 (well water).
335	Expansion of the quarry into the Northern Tract will degrade the aesthetic quality of life for local residents.	9, 20, 28, 32, 36, 42, 43, 44, 53, 55, 73, 75, 83	Public Welfare Issues	Please see responses to comments 83 (stream testing), 184 (nuisance), and 214 (property value).
336	I write in support of the efforts by Friends of Toms Creek and concerned citizens of Adams and Franklin counties to preserve our quiet mountain heritage and pure mountain air, which we have enjoyed and cherished for many years before the intrusion of vast surface (mountain top removal) mining. Please deny the above referenced permit applications for these listed reasons.	1, 2, 3, 10, 36, 42, 62, 63, 64, 73, 75	Public Welfare Issues	Please see response to comment 1 (permit application review).
337	Homesteading in this area dates back to the 1700's. Families were able to thrive on fresh air, abundant wildlife, and pure water from mountain springs and reliable water wells.	9	Public Welfare Issues	Please see responses to comments 1 (permit application review), 80 (stream flow loss), 239 (asbestos) and 276 (natural diversity).
338	In addition to pristine waters and unique wetlands, the Toms Creek watershed supplies water to the Borough of Fairfield, feeds the Chesapeake Bay, and is rich in cultural and historic assets, including the location of the July 4-5, 1863 Civil War retreat following the Battle of Gettysburg.	9	Public Welfare Issues	Please see responses to comments 35 (historic), 80 (monitoring wells) and 122 (wetlands).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
339	Appendix D: Appalachian-Blue Ridge Forest Ecosystem: The Appalachian-Blue Ridge forests is an ecoregion in the Temperate broadleaf and mixed forests Biome, in the Eastern United States. The ecoregion is located in the central and southern Appalachian Mountains, including the Ridge-and-Valley Appalachians and the Blue Ridge Mountains. It covers an area of about 61,500 square miles (159,000 km2) in: northeast Alabama and Georgia, northwest South Carolina, eastern Tennessee, western North Carolina, Virginia, Maryland, and central West Virginia and Pennsylvania; and small extensions into Kentucky, New Jersey, and New York. They are one of the world's richest temperate deciduous forests in terms of biodiversity; there are an unusually high number of species of both flora and fauna, as well as a high number of endemic species. The reasons for this are the long-term geologic stability of the region, its long ridges and valleys which serve both as barrier and corridors, and their general north-south alignment which allowed habitats to shift southward during ice ages. The mountains also contain a large variety of diverse landscapes, microclimates and soils all constituting microhabitats allowing many refugia areas and relict species to survive and thrive.	55	Public Welfare Issues	Please see response to comment 276 (natural diversity). SGI must operate in compliance with all applicable state regulations, written to protect natural resources like those described in this comment.
340	Areas of intact forest, mostly in public ownership, include: Michaux State Forest is the location of several "firsts" in Pennsylvania Forestry. The first state nursery was established at Mont Alto in 1902. Rothrock opened the first forestry school in Pennsylvania and the second in the United States at what is now Penn State Mont Alto. Michaux State Forest saw the first wooden fire tower in 1905 as well as the first steel fire tower in 1914.	55	Public Welfare Issues	Please see response to comment 276 (natural diversity). SGI must operate in compliance with all applicable state regulations, written to protect natural resources like those described in this comment.
341	We are shocked by the prospect of the destruction of the mountain which was once part of protected Michaux State Forest by the expansion.	43, 44	Public Welfare Issues	Please see responses to comments 239 (asbestos) and 250 (effluent characterization).
342	I have seen SGI plant trees to fulfill their "green part" and have watched many trees just die. I invite you to my property and neighborhood to see the harmful effects.	20	Public Welfare Issues	See response to comment 289 (Non Coal Act Purpose). SGI has planted evergreen trees in several areas along the perimeter of the Northern Tract, Pitts Quarry, and other areas of the plant. This was done as a voluntary measure of goodwill to increase screening between public roads and mining activities. As with any large-scale planting, some trees did not survive. SGI has replaced several of these trees in subsequent years and plans to continue to maintain these vegetative screens in the future. As defined in the Hamiltonban CUP and the Northern Tract permit application, SGI has agreed to maintain an extensive vegetated buffer around the Northern Tract Quarry. This tree planting is not a requirement by the Department.
343	Michaux State Forest is now a thriving second growth forest. It is open to recreational hunting, fishing, hiking and mountain biking. It is crossed by the Appalachian Trail. Remnants of the charcoal days can still be seen in the state forest as the land where the kilns burned for so many years has yet to fully recover. Visitors to the park will notice these areas as large grassy meadows that are surrounded by the woods of Michaux State Forest.	55	Public Welfare Issues	SGI must operate in compliance with all applicable state regulations, written to protect natural resources like those described in this comment.
344	We are concerned about the long-term quality of the area west of Gettysburg and Fairfield: forest land is important for air quality and natural habitat. In addition, as you know, that area also has historic significance as part of the retreat from the Battle of Gettysburg.	75	Public Welfare Issues	Please see responses to comments 35 (historic) and 276 (natural diversity).
345	Of increasing importance: the entire greater Fairfield area is attracting more and more recreational opportunities and tourism, with the business advantages these represent for the township. Preservation of mountains and a clean environment is important in attracting more visitors to what is becoming a desirable recreation destination, as well as the historic Civil War trail.	75	Public Welfare Issues	Please see responses to comments 35 (historic), 38 (Anti-Degradation Supplement), 207 (economy), 214 (property value).
346	Our rural community and scenic territory are being destroyed by SGI surface mining. At the turn of the last century tourists and other visitors flocked to our mountains to partake of fresh air, pure water, and incredible mountain vistas. It is indeed ironic that dust, green water, and vast pits now reverse that tourist boom!	32	Public Welfare Issues	Please see responses to comments 38 (Anti-Degradation Supplement), 83 (stream testing), 207 (economy), 214 (property value), and 276 (natural diversity).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
347	IMPACT ON NEW TOURISM! Our community has three new and exciting tourism venues: Monterey Battlefield Park, Liberty Mountain Resort (recently under new management), and a new Orvis upland shooting plantation. We must support these opportunities for employment and tourist growth. There is nothing compatible between healthful, sustainable tourism and unhealthy, unsustainable surface mining. Hikers, bikers, equestrians, and sporting enthusiasts all seek out healthful, scenic venues, and fresh air. Please view this video to independently assess whether SGI operations are compatible with these activities. http://youtu.be/8iDCaAkFWus	9	Public Welfare Issues	Please see responses to comments 38 (Anti-Degradation Supplement), 207 (economy), and 214 (property value).
348	Driving past a dusty, noisy, ugly quarry will hurt all of these endeavors. Extending the quarry north to Gum Springs will cause economic harm to the County and the Township by its presence exactly where recreational opportunities and historic tourism is developing.	55	Public Welfare Issues	Please see response to Comments 35 (historic), 38 (Anti-Degradation Supplement), 184 (nuisance), 207 (economy), 214 (property value).
349	POVERTY! Neighboring property owners are unable to leverage equity because equity is disappearing! This is directly related to SGI operations that depress property values due to nuisances - air, light, and noise pollution - and a limited, fragile aquifer. Citizens are being robbed of opportunities to use home equity for higher education or unexpected medical costs, making the cycle of poverty difficult if not impossible to overcome.	9	Public Welfare Issues	Please see response to Comments 77 (groundwater monitoring), 80 (monitoring wells), 182 (glare), 184 (nuisance), 214 (property value).
350	I am deeply concerned about the abundance of trucks traveling just a few feet from my home, every day, and large numbers of them. From what I see, many are traveling with no covering over the contents they are hauling, which I understand is potentially toxic. This dust flies into the air, into my home, gets wet and flows into my vegetable garden, coats my car. I am concerned over the large amount of heavy haulers on our residential roads all day, every day, traveling above the posted speed limit and using brake retarders from the top of Charmian to the mine entrance.	31	Trucks	Please see response to comments 9 (legal requirements) and 354 (access road).
351	SGI's proposed road to connect its facility with Route 16 could be a substantial contribution to reducing the air and noise pollution and safety threats from the large number of trucks hauling product to and from the SGI facility. SGI has presented the plan as in effect partial mitigation for the impact of the opening of the new mining operation. Therefore the plan for the road should be considered as part of the overall application by SGI, and its adequacy addressed along with the adequacy of the other parts of its petition. The road will concentrate truck traffic in a new portion of the community which also has homes and residents who also are entitled to their privacy and quiet. SGI has a legal obligation to make every reasonable effort to reduce the adverse impact of the new road. Accordingly the plan for the new road must be assessed as to whether it has been adequately designed to minimize noise, air pollution and other effects from the construction, and from truck traffic once it is in operation. SGI as a condition of any approval of its petition should be required to commission independent modeling studies of the impact of the new road, and the study should be submitted to the appropriate authorities and made public before final plans and permits for the road are approved. SGI should be required as a condition of approval of its petition to take all steps indicated by the study that are possible and reasonable to reduce the adverse effect of the new road on the immediate neighborhood where it will be built. DEP should require monitoring of noise levels along the proposed new road to 16, as well as the existing and new quarry areas.	27, 28	Trucks	Please see response to comment 184 (nuisance).
352	The D.L. George truck depot along Highway 16 has been a recurring and irritating source of noise and light to the neighborhood. SGI should agree to use its influence as contractor to have D.L. George reduce this noise and light pollution.	27, 28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27). DEP and SGI further note that the referenced facility is several miles away from the SGI Northern Tract site and is not a corporate affiliate of SGI.
353	SGI states in its application that "The modifications to the Charmian Facility operations proposed as part of this Northern Tract Quarry permit application are not intended to increase production capacity at the Charmian Facility nor result in increased truck traffic." [p.43] DEP should require that neither production nor traffic should increase, and that the permit is cancelled if they attempt to do so.	27, 28	Trucks	Please see response to comment 184 (nuisance).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
354	Although I agree with the plan that SGI proposes to construct a new access road connecting the Charmian facility directly to State Route 16, thereby allowing most trucks to bypass and avoid Old Waynesboro Road and other local roads, I see no way of enforcing it and no alternative proposed for either current mitigation of the truck problem or mitigation of the destructive and dangerous trucking situation that currently exist if this plan falls through. I would suggest that the building of this road be made a condition of approval for the permit of Pine Hill mining operation.	32	Trucks	Please see response to comment 184 (nuisance). Permitting of the new access road was completed on October 16, 2018. Construction of this access road has already begun. The Department does not feel it is necessary to make the completion of this access road a condition of approval for the Northern Tract Quarry permit.
355	Another major concern is the noise pollution and potential dust inhalation created by tractor trailers from the mine running a regular trucking route through residential areas.	9, 10	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
356	SGI's proposed road to connect its facility with Route 16 could be a substantial contribution to reducing the air and noise pollution and safety threats from the large number of trucks hauling product to and from the SGI facility.	28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
357	SGI has presented the plan as in effect partial mitigation for the impact of the opening of the new mining operation. Therefore the plan for the road should be considered as part of the overall application by SGI, and its adequacy addressed along with the adequacy of the other parts of its petition.	28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
358	The road will concentrate truck traffic in a new portion of the community which also has homes and residents who also are entitled to their privacy and quiet.	28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
359	SGI has a legal obligation to make every reasonable effort to reduce the adverse impact of the new road.	28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
360	Accordingly, the plan for the new road must be assessed as to whether it has been adequately designed to minimize noise, air pollution and other effects from the construction, and from truck traffic once it is in operation.	28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
361	SGI as a condition of any approval of its petition should be required to commission independent modeling studies of the impact of the new road, and the study should be submitted to the appropriate authorities and made public before final plans and permits for the road are approved.	28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
362	SGI should be required as a condition of approval of its petition to take all steps indicated by the study that are possible and reasonable to reduce the adverse effect of the new road on the immediate neighborhood where it will be built.	28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
363	DEP should require monitoring of noise levels along the proposed new road to 16, as well as the existing and new quarry areas.	28	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
364	Massive trucks rumble noisily in and out of the neighborhood on narrow country roads ill-suited to support them.	78	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
365	SGI should be required to construct a road that directly accesses PA Route 16 which is constructed to handle heavy commercial trucking.	32	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
366	With trucking from SGI running seven days a week, 14 hours a day, there is no escape from the danger they present to foot traffic and bikers. Clearly regular trucking in this area discourages folks from visiting, walking, bike riding, and many other kinds of recreational activities on or near these roads.	32	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
367	According to "True Cost Blog", freight trucks cause 99% of wear-and-tear on US roads, but only pay for 35% of the maintenance. One fully loaded 18-wheeler does the same damage to a road as 9600 cars. Even at 10 trucks an hour traveling over Old Waynesboro Pike, Charmian, and Monterey Lane, in terms of damage that is the same as 96,000 cars an hour! But we bear the bulk of the cost of frequently resurfacing these roads that are not built to handle the weight.	32	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
368	The proposed Northern Tract Quarry will only increase the commercial truck traffic and therefore increase the danger, noise, frequency of operation, loss of revenue and housing values that we are already experiencing.	32	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
369	Should the Northern Tract Quarry permit be issued, SGI should be encouraged to work with the community to minimize nuisances such as truck traffic and dust.	83	Trucks	Please see response to comment 184 (nuisance) and 44 (Article 1 Section 27).
370	How will trucks be monitored for emissions compliance on a daily basis? Has the existing quarry been required to do same? Who monitors and waters down or cleans streets affected by heavy traffic?	41	Trucks	With regard to air emissions from the existing quarry, please see SGI First Responses §8, which describes in detail SGI's compliance with applicable air emissions requirements. With regard to watering and cleaning of streets, SGI First Responses §5.3 explains that control of local roadways is under the purview of Hamiltonban Township. SGI has worked with the Township to adopt the two mile section of road between the quarry and Route 16 that carries SGI related truck traffic. Furthermore, SGI recently purchased a street sweeper and utilizes it to clean roads near the site entrances as needed. SGI's street sweeper is reportedly a state-of-the-art sweeper utilizing a broom system and water sprays to collect debris while minimizing dust generation. (That unit is certified for PM-10 emissions control under the stringent standards of Southern California Air Quality Management District Rule 1186.) SGI states that it will continue to work in partnership with the Township to help maintain the portion of road utilized by SGI-related trucks. SGI has indicated that it dedicates a crew once a month to pick up trash on the roads on around the perimeter of the property. Finally, SGI reports that it is building a new access road to Route 16 which will redirect approximately 75% of the truck traffic away from local streets.
371	Why are there no signs leading to and from the quarry advising the community of the truck traffic?	41	Trucks	The issue referred to in this comment should be substantially alleviated by the installation of the Route 16 connector described in SGI First Responses §5.2 and SGI Second Responses §7.1. Construction of the Route 16 connector project is currently underway. As indicated in SGI First Responses §5.3, SGI has hired a traffic consultant to review traffic patterns and controls near the site entrances where SGI-related truck traffic regularly travels. At the conclusion of this study SGI will make recommendations to the Township for improvements and the placement of additional signs or signals where needed. SGI will offer to fully pay for installation of this signage. The Route 16 connector is partially completed and is expected to be finished by the end of 2020.
372	How many trucks will the DOT permit on any given day?	41	Trucks	Old Waynesboro Road (current haul road connection) is not a PennDOT road. Hamiltonban Township has no current restriction on the number of trucks entering or leaving the site. Once the Route 16 connection is completed (please see response to comment 354), PennDOT has issued a low-volume driveway permit to SGI which applies to a range of 25 to 750 vehicles per day. It is anticipated that average daily use would be much less than the allowable maximum.
373	Has a traffic study ever been done?	41	Trucks	Please see response to comment 184 (nuisance) and 371 (traffic study).
374	Has there been an estimate of the increase to SGI traffic if the proposed mining goes forth?	41	Trucks	Please see response to comment 184 (nuisance) and 371 (traffic study).
375	We currently hear trucks and equipment from the existing mine throughout the day and evening. This mining expansion will produce even more noise disruption. The constant truck traffic will also destroy our roads because these roads are not built to handle the volume. The maintenance and upkeep of these roads will fall on the taxpayers.	53, 54	Trucks	Please see response to comment 184 (nuisance) and 371 (traffic study).
376	I am pleased that everyday there are no trucks run from 9:00 p.m. until 7:00 a.m. for the local residents. And also that there are no backup beepers used on any of the machinery at night. They use strobe lights on the machinery instead.	80	Trucks	DEP duly notes this comment.
377	I am grateful for their superb winter road maintenance along Old Waynesboro Road and all of the other road repairs that are maintained year round.	80	Trucks	DEP duly notes this comment.
378	I am impressed by the mill taking another step to keep residents happy by them doing - by them being in the process of taking the tanker trucks off of Old Waynesboro Road and putting in a new road that runs straight from the mill to the tanker parking lot off of route 16.	80	Trucks	DEP duly notes this comment.
379	The above-referenced permit is currently under review by PA DEP and is strongly opposed by the surrounding communities.	9	Overall Permitting Issues	Please see response to comment 1 (permit application review).
380	During this time of extremely constrained budgets, it makes no sense that we, and these communities, are compelled to fight against permitting large surface mining in a protected watershed and that we are compelled to write to you for assistance to stop it.	9	Overall Permitting Issues	Although public participation is a significant effort for local residents, it is an important part of the environmental permitting process in a case like this. DEP takes public participation and public concern very seriously.
381	It is indeed audacious that this permit - involving a watershed with High Quality and Exceptional Value streams that flow directly to the Chesapeake Bay - is even under consideration, much less being greedily pursued for the grinding of greenstone (metabasalt), a rock known to contain naturally occurring asbestos.	9	Overall Permitting Issues	DEP is required by law to review this project because an application has been filed by SGI for it. The fact that DEP must review an application does not predetermine what DEP's decision on that application will be.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
382	I truly hope we can find that balance. And I truly hope that we can heal as a community and keep our friends on both sides of the room.	83	Overall Permitting Issues	Please see the response to comments 1 (permit application review), 132 (public participation) and 38 (Anti-Degradation Supplement) and 44 (Article 1 Section 27).
383	I recommend that additional investigation be conducted by the DEP and the company be held to the highest standard of air quality.	4	Overall Permitting Issues	Please see response to comment 1 (permit application review), 428 (silica), 431 (risk), 445 (air monitoring), and 44 (Article 1 Section 27).
384	We have nothing but DEP to defend our rights to clean air, clean water, road quality and safety in the future of our children.	11	Overall Permitting Issues	Please see response to comment 1 (permit application review) and 44 (Article 1 Section 27).
385	SGI has plenty of money and lawyers to explain away every point of contention and question we have as is witnessed in their 180 page response to DEP.	11	Overall Permitting Issues	Please see response to comment 1 (permit application review) and 44 (Article 1 Section 27).
386	I'm sure that SGI has an explanation for what I'm about to point out, just as they did for every question asked at the last meeting. But let's look at the examples anyway. Violation ID 1825511 labeled air quality. This violation was a failure to prevent fugitive particulate matter from passing outside a person's property. The fine was \$4,500. SGI complied, and the case was closed.	11	Overall Permitting Issues	This violation occurred on 8/25/09 when DEP received a voicemail notification from the facility of a malfunction at dust storage silo #2 which resulted in airborne dust. A citizen complaint regarding the incident was also filed the next day. On 9/3/09, the facility confirmed that dust fines from the 8/25/09 malfunction resulted in fugitive emissions leaving ISP's (2011 name change to SGI) property. ISP submitted a process malfunction report letter regarding the 8/25/09 malfunction. The malfunction was corrected, and the following improvements were completed by ISP to prevent recurrence: installation of a secondary high level sensor in each fines silo which will alarm and shut down the material flow to the silo if the fines level reaches the capacity of the silo, and installation of emergency stop switches at ground level, which can be activated by any operator if an equipment malfunction occurs at the fines storage silos. It should be noted that the \$4,500 penalty addressed Notices of Violation dated 11/4/08, 3/16/09, 3/25/09 and 9/16/09.
387	ID number 217335, air quality failure to take reasonable actions to prevent particulate matter from becoming airborne. The fine was \$1,125.	11	Overall Permitting Issues	The enforcement ID provided here appears to refer to a facility in a different county. However, an \$1,125 penalty was assessed against SGI on 10/2/15. This penalty concerned an NOV dated 11/10/2014, which in turn concerned a DEP inspection on 10/30/14, when continuous fugitive emissions >7% opacity were observed emanating from an enclosed conveyor waste dust silo discharge point controlled by dust collector C420A, associated with Source 420. The facility submitted an NOV response dated 11/25/14, which stated that upon discovery of the fugitive emissions, the undersize materials processing plant was shut down until the issue was resolved. It was found that the air slide at the waste silo had been adjusted incorrectly, which caused the fugitive emissions from the enclosed conveyor. This was re-adjusted, thus resolving the problem. The letter further stated that "We have audited similar equipment at the site to ensure that we have control of this issue at other locations throughout our facility. The daily monitoring is proving the air supply adjustments successful." DEP re-inspected the facility on 1/28/15 and the affected source was observed to be operating in compliance.
388	This one had a civil penalty of \$10,700. SGI complied and the case was closed.	11	Overall Permitting Issues	DEP has not assessed a penalty of \$10,700 to SGI. Please see comment 2 and 387 (compliance).
389	ID number 2317327, air quality. Penalty \$1,125, complied, case closed.	11	Overall Permitting Issues	Please see the response to comment 387 (compliance).
390	Due to past violations, SGI's operation should be monitored very closely by DEP.	11	Overall Permitting Issues	Please see the response to comment 128 (compliance). Since October 2014, SGI has had one air quality-related NOV and one associated consent assessment of civil penalty for fugitive dust. The dust issue was from the discharge point of the undersize material processing plant. While these emissions were a violation of good operating practices, there were no fugitive emissions noted crossing off the property. The facility shut down the affected process and made appropriate repairs prior to putting it back in to service. In 2015, during a DEP air quality inspection, there were emissions of minor significance emanating from a silo elevator that again did not cross off the property. The equipment was immediately shutdown to investigate. Appropriate repairs were made prior to returning the equipment to service. There was no NOV issued. Since that time there was one air quality inspection in 2016 that indicated that there were no air quality violations at the time of inspection. There have been no air quality inspections at the site since. In January 2014, DEP received a complaint concerning green snow. An investigation was conducted, but the complaint was unable to be substantiated. Until July 2018, there had been no complaints of dust crossing the property line. At that time, DEP received a complaint of dust from the facility, and road dragout. An investigation was conducted and found that there was staining on the road but no active dust from dragout. Further, the inspector did not note any fugitive dust crossing the property boundary. The facility uses reasonable daily measures to minimize dust from the facility and dragout. There were no air quality violations noted from this complaint. DEP has received no other air quality complaints concerning this facility.
391	Why isn't there an Air Quality Permit required? Will it come later? See attached records concerning particulate matter by company. Attachments (vii & viii) of Particulate Emissions, <2.5 microns and <10 microns.	32, 55	Overall Permitting Issues	The stone mined from the Northern Tract Quarry will be processed at the existing stone processing/roofing granule manufacturing facility at the existing quarry. This operation is already authorized to operate by Air Quality Operating Permit No. 01-05016. SGI has indicated that this will not change production levels at the existing facility. See also the responses to comments 393 (permit conditions), 428 (silica), 431 (air monitoring).
392	I don't trust conditional promises. I want to see them in writing. And as part of the Pine Hill mining permit approval process, I believe that these should be included.	11	Overall Permitting Issues	DEP has included appropriate enforceable conditions regarding applicable requirements.
393	Rigid dust control measures and monitoring should be part of the approved permit.	11	Overall Permitting Issues	After detailed review, DEP has included permit conditions that require SGI to implement appropriate dust control practices, and to perform perimeter monitoring and analysis for asbestos, and to provide periodic reports.
394	Naturally occurring asbestos in the rock in the existing Pitts Quarry may be harmful to public health, since it is currently being disturbed, due to emissions into the air.	9, 10, 11, 14, 18, 28, 32, 33, 35, 43, 44, 45, 53, 55, 65, 66, 67, 68, 83, 86	Public Health Concerns	Please see the response to comment 431 (risk).
395	What reports are available showing the friable materials that are admitted to the air and their contents?	41	Public Health Concerns	In response to this issue, the applicant in its 12/11/19 technical deficiency response letter provided industrial hygiene and outdoor sampling results. SGI provided further information regarding facility air sampling in its second technical deficiency response letter dated 2/18/20.

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
396	How are the friable materials kept on site and not permitted to escape onto adjoining properties?	41	Public Health Concerns	Please see the response to comments 393 (permit conditions), 428 (silica) and 431 (risk).
397		41, 49	Public Health Concerns	<p>Per the applicant's 12/11/19 technical deficiency response letter, "SGI's operations at the Charmian Quarry are regulated by the U.S. Department of Labor, Mine Safety and Health Administration ("MSHA"), including the Safety and Health Standards contained in 30 CFR Part 56, applicable to surface metal and nonmetal mines. SGI maintains a safe workplace by assuring concentrations of asbestos in the employee air are below MSHA standards. The mine does not have any licenses or permits related to asbestos, nor are any required. Nevertheless, the facility conducts routine industrial hygiene air sampling for asbestos, and has implemented a Suspect Material Protocol. In 2019 an MSHA inspector discussed asbestos in the workplace with SGI and took asbestos air samples at the facility. Our understanding is this was related to community contacts with MSHA over the pending Mine Permit Application.</p> <p>Per the applicant's 2/18/20 second technical deficiency response letter, "The results of the most recent MSHA asbestos sampling at the Charmian facility are available at https://www.msha.gov/mine-data-retrieval-system. This sampling event occurred on July 10, 2019. During this event MSHA sampled two employees, a utility man and a dry screen plant operator, for asbestos. The results of both samples indicate 0 fibers/cc for the sampling period.</p> <p>Furthermore, as noted above, dating back to 2009 (the earliest year for which SGI maintains records of pertinent laboratory reports), amphibole asbestos was either not detected or detected in concentrations lower than MSHA's "full-shift" PEL in greater than 99.8% of samples analyzed by RJ Lee Group. MSHA's full-shift PEL assumes that mine workers can be safely exposed, without personal protective equipment, to airborne asbestos at a concentration of just under 0.1 f/cc for a full 8-hour shift each and every work day of their careers. In short, this sampling indicates that SGI's employees are not exposed to airborne asbestos in concentrations that would violate MSHA standards or pose a threat to their health - and there is no reason to believe mining operations in the Northern Tract would be any different.</p> <p>Moreover, the indoor air associated with SGI's mineral processing activities passes through a baghouse before being emitted outdoors. To the extent that any asbestiform particles might pass through or otherwise evade the baghouse, dilution in the ambient air prevents any meaningful concentrations of airborne asbestos from reaching off-site receptors. This is supported by the results of the two rounds of perimeter air sampling that SGI conducted in conjunction with this application, which did not detect airborne asbestos in concentrations that are statistically different from those typically present in the ambient air. Moving forward, SGI has committed to the implementation of an Asbestos Air Monitoring and Mitigation Plan to assure that SGI's Northern Tract operations do not result in elevated asbestos emissions. In sum, based on all existing data, and in light of SGI's proposed protective measures, there is no reason to believe that SGI's proposed operations in the Northern Tract would pose an asbestos-related public health risk.</p> <p>DEP concurs with these conclusions.</p>
398	As a resident of Blue Ridge Summit, PA, which is adjacent to the SGI mine, I am concerned about the run-off water quality and also the amount of dust produced by the mining operation. The greenstone being mined may contain actinolite, a sharp needle-like form of asbestos. Grinding the greenstone releases the dust into the atmosphere and water. When the run-off dries, the dust is re-released at the drying point.	9, 10	Public Health Concerns	Please see the response to comment 431 (risk).
399	Greenstone, which is made up of chlorite, various green amphiboles, and actinolite, is being processed near out neighborhoods, transported through our neighborhoods, and used by manufacturers in our roofing shingles. According to the Mesothelioma Center website, actinolite in its fibrous form, the form found most prevalently in the Appalachian Mountains, is asbestos. These asbestos fibers, which are carried by wind and water, can present a hazard within the vicinity of greenstone mining. So we must ask - are truck surfaces spreading these fibers through our residential streets?	11	Public Health Concerns	Please see the response to comment 431 (risk).
400	Noticeable in my community lately is an increase in the number of metal roofs. The PA DEP should conduct a public service campaign encouraging the use of metal roofs and avoidance of asphalt shingles due to the asbestos content instead of contemplating approval of a permit to mine and process greenstone.	9	Public Health Concerns	Please see the response to comment 204 (asphalt shingles).
401	So, one serious question to ask when evaluating the "Social and Economic Justification" (SEJ) is: how many cases of mesothelioma does it take before the benefits of the mine to the community are outweighed by the costs to the community? This question has not been seriously dealt with in the SEJ. It needs to be explicitly addressed and appropriate conditions placed on the mine before permit approval.	14	Public Health Concerns	Please see the response to comment 38 (Anti-Degradation Supplement), 393 (permit conditions), 411 (employee health concerns), and 431 (risk).
402	Another condition on the permit in question should be that SGI provide full data on current and past employees to a state or federal public health agency, and fund an ongoing study into the long-term health of these workers as well as the health of families in the vicinity of the mine. This should include the truckers and other staff not directly employed by SGI but who are routinely exposed to mine waste and dust. All data and results should be anonymized and made public while the study unfolds.	49, 87	Public Health Concerns	Please see the response to comment 38 (Anti-Degradation Supplement), 393 (permit conditions), 411 (employee health concerns), and 431 (risk).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
403	Are asbestos fibers being carried home on the clothing of truckers and mine workers to their families?	11, 32	Public Health Concerns	Please see the response to comment 72 (asbestos), 393 (permit conditions), and 411 (employee health concerns).
404	My concern is what health risks surface mining poses for the citizens of Adams and Franklin Counties living in the shadow of the mining operation, as well as for the employees of the mining company itself. A primary concern is the possible presence of asbestos and other potentially toxic pollutants being dispersed into the atmosphere as a result of the destructive process of blasting and grinding surface stone.	33	Public Health Concerns	Please see the responses to comments 72 (asbestos), 393 (permit conditions), 72 (asbestos), 393 (permit conditions), 411 (employee health concerns), 428 (silica) and 431 (risk).
405	SGI states, "[t]here has been no claim from a Charmian employee claiming to have acquired mesothelioma from working at the mine."	9	Public Health Concerns	Please see the response to comment 411 (employee health concerns)
406	Please ask SGI: "Have SGI employees, including employees of predecessor companies, or families of these employees, been paid undisclosed amounts for illnesses or death caused by asbestos, silicates, or other toxins?"	9	Public Health Concerns	Please see the response to comment 411 (employee health concerns).
407	No more undisclosed settlements that bury the truth. Understanding the danger will bring us closer to eliminating that danger. And will heal the community which has borne a tremendous burden of silence for decades.	32	Public Health Concerns	Please see the response to comment 411 (employee health concerns).
408	Members of our community have lost loved ones to asbestosis, and SGI's parsing of words suppresses the truth. We ask that you factor the value of lost life as you consider the social and economic burdens of large-scale surface mining of greenstone.	9	Public Health Concerns	Please see the response to comment 411 (employee health concerns).
409	Another condition on the permit in question should be that SGI provide full data on current and past employees to a state or federal public health agency, and fund an ongoing study into the long-term health of these workers as well as the health of families in the vicinity of the mine. This should include the truckers and other staff not directly employed by SGI but who are routinely exposed to mine waste and dust. All data and results should be anonymized and made public while the study unfolds.	14	Public Health Concerns	Please see the response to comment 38 (Anti-Degradation Supplement), 393 (permit conditions), 411 (employee health concerns), and 431 (risk).
410	I know for a fact that in 1975, when mining a company operated under the acronym GAF, at least one employee died from mesothelioma, an asbestos-associated malignancy. And his family was compensated in an out of court settlement for an undisclosed amount of money.	33	Public Health Concerns	Per the applicant's 12/11/19 technical deficiency response letter, "SGI has no information regarding the alleged event described." Further DEP lacks any information about the purported incident.
411	My questions regarding the mine site in question are one, how many other miners and/or their families have been compensated for asbestos induced illness and/or death from mesothelioma or other related diseases caused by silica and other dangerous minerals.	33	Public Health Concerns	<p>Per the applicant's 12/11/19 technical deficiency response letter, "SGI is aware of three former employee reports of alleged negative health impacts from exposure to asbestos or silica dust.</p> <p><i>One former employee, who worked for SGI from 1972 until 2011 was diagnosed with lung cancer. In 2018 he initiated a legal action seeking compensation for the development of lung cancer naming SGI as one of numerous defendants. The employee, a smoker, alleged that his exposure to asbestos caused his development of lung cancer. SGI disputed the allegations for multiple reasons. By stipulation of the parties, SGI was dismissed from the action in 2018, without prejudice and without any payment to the former employee.</i></p> <p><i>A second former employee, who worked for SGI from 1995 until 2008, died from lung cancer in 2008. The employee was a smoker and his medical tests showed no signs of silicosis. His next of kin subsequently filed a Worker's Compensation fatal claim petition alleging silica exposure significantly contributed to his lung cancer. SGI disputed the allegations for multiple reasons, including that there was no evidence of silica exposure and no medical evidence that silica causes lung cancer in the absence of silicosis. The claim was ultimately settled for an amount substantially below the demand.</i></p> <p><i>A third former employee, who worked for SGI from 1975 until 2008 was granted long term disability with extended medical coverage. The granting of long-term disability does not require a determination of the cause of the medical condition, only that the worker is disabled for any reason. The employee was diagnosed with asbestosis, pneumoconiosis secondary to dust and silica exposure, and other acute and subacute respiratory conditions that his doctor opined was due to fume and vapor exposure. It was alleged that in the early part of his career the employee worked with a fibrous asbestos product purchased by SGI from a third party vendor for use in maintenance activities, which product is no longer used at the mine."</i></p>

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
412	Has the mine operation ever been sanctioned by OSHA or the EPA for dangerous air pollution violations?	33	Public Health Concerns	Per the applicant's 12/11/19 technical deficiency response letter, " <i>Neither EPA nor OSHA has ever cited or (to SGI's knowledge) investigated the facility for air quality issues. With respect to MSHA, SGI reviewed on-line citation records since 1996 which showed one citation for air quality issues. In March 2009, a \$100 citation was issued for an alleged silica air sample in the workplace exceeding the permissible exposure limit ("PEL") but not the PEL times the error factor. To SGI's knowledge, the only other investigation by MSHA was conducted in 2019 in response to a community concern regarding asbestos. MSHA's findings were negative (no asbestos exposure found).</i> " Further DEP is unaware of any sanctions by OSHA or EPA.
413	We have seen no health studies regarding the effects on area residents of breathing silica and naturally occurring asbestos in the greenstone dust from the mine. Now our roads are paved with greenstone as well, covering our houses and cars with the same dust. These air quality and health studies must be done.	21, 22, 23, 24, 25, 26, 30, 56, 57, 58, 65, 66, 67, 68	Public Health Concerns	Please see the response to comments 428 (silica) and 431 (risk).
414	The employees now have to wear special sealed masks so as not to breathe in any of the air and it is recommended by the company to change clothes and shoes, before leaving. However, this is not required, and we know for a fact that many employees do not change before leaving work and end up taking this killing dust home to small children.	55	Public Health Concerns	Per the applicant's 12/11/19 technical deficiency response letter, " <i>SGI adheres to all legal requirements and standard industry practices with respect to worker protection. With regard to dust exposure, our machinery is equipped with required dust control devices and procedures are in place to lower worker exposure to dust. There is a respirator policy in place (Attachment K) and respirators must be worn during activities that may expose workers to excessive dust or while working in certain areas. Respirators certified for dust exposure are available for all employees, employees are trained on their proper use and they are fit tested. There is no requirement for respirators to be worn to prevent asbestos exposure as there are no levels of asbestos at the facility that would require workers to wear respirators.</i> " DEP concurs that this response adequately addresses the comment.
415	We believe SGI workers are adequately protected from asbestos exposure.	9	Public Health Concerns	Please see the response to Comment 414 (worker protection program).
416	From a medical perspective, it seems to me that while these questions remain unanswered or up in the air, so to speak, allowing expansion of the SGI mining operation would be sheer folly.	33	Public Health Concerns	Please see the response to comment 428 (silica) and 431 (risk).
417	Naturally occurring asbestos in the rock in the Northern Tract may be harmful to public health, if it is disturbed, due to emissions into the air.	9, 10, 11, 14, 18, 28, 32, 33, 36, 42, 43, 44, 45, 53, 55, 65, 66, 67, 68, 73, 75, 83, 86	Public Health Concerns	Please see the response to comment 72, 239 (asbestos) and 431 (risk).
418	Even a minimal exposure would be a severe threat to the health of nearby residents as well as visitors and tourists.	43, 44	Public Health Concerns	Please see the response to comment 431 (risk).
419	SGI has not been honest about the dangers of dust, nor diligent about watering to keep it down and has never warned the public about it. And never admitted the problem to any state or federal agency.	55	Public Health Concerns	Please see the responses to comment 393 (permit conditions), 428 (silica), and 431 (risk).
420	I have very serious concerns about the air we're breathing and for legitimate reasons.	86	Public Health Concerns	Please see the response to comments 393 (permit conditions), 428 (silica), and 431 (risk).
421	As a person who is highly sensitive to particulates in the air, I listened with concern as the issue to air quality was highlighted. Part of why my husband and I purchased our farm was to be able to be outside and not be affected by air-borne particulates.	4	Public Health Concerns	With regard to particulates in general, as opposed to asbestos in particular, DEP does not have reason to believe that the generic particulate emissions from this facility are of greater concern than those from the many other quarries in the Commonwealth. However, as noted elsewhere in this comment and response document, DEP concurs that the asbestos and silica issues regarding this facility deserve a separate analysis. It should also be noted that Adams County is not presently deemed to be in violation of any federal air quality standards regarding particulates.
422	Is there sufficient evidence about airborne particulates in relation to current operations of the mine?	4, 61	Public Health Concerns	Please see the response to comment 72 (asbestos) and 370, 390 (dust).
423	Is there sufficient evidence that air quality will not be affected by expanded operations?	4, 61	Public Health Concerns	Please see the response to comment 72 (asbestos) and 370, 390 (dust).
424	Has there been any bacteriological contamination (i.e., road, dust, friable) testing done, are reports available, and has the PADEP received and reviewed them?	41	Public Health Concerns	Please see the response to comment 72 (asbestos) and 370, 390 (dust). Also, DEP does not presently perceive "bacteriological contamination" of dust from the quarry to be an issue of concern in this matter.
425	What analysis of "fugitive air particles" has ever been done? Have tests been done as part of the approval process for the Northern Tract Quarry permit? If so, as a community, we need to know the results.	11	Public Health Concerns	Please see response to comment 72 (asbestos) and 370, 390 (dust).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
426	The Health of the community is threatened by the heavy dust (probably laced with asbestos) and definitely laced with very fine silica, both of which caused a friend's grandfather to die of Mesothelioma because he worked at the Grit Mill before they required masks.	55	Public Health Concerns	Please see the response to comment 393 (permit conditions), 411 (employee health concerns), and 428 (silica).
427	They need to control dust that is laced with silica and asbestos that covers the local community, especially when it is dry weather.	10	Public Health Concerns	Please see the response to comment 393 (permit conditions) and 428 (silica).
428	Recently there's been publicity about black lung disease coming back up with miners in coal. And it turns out that's caused by silica. They're okay with the coal dust, but what they're having to do is cut through silica walls to get to the new seams. And when they do that, the silica is tearing up their lungs because it's like glass is. That's what silica And so you're getting a lot of new black lung disease cases. And there are statistical- there have been studies of health outcomes around mines such as this. And the health issues decrease as you get farther from the mine. There's scientific proof this is not just somebody's opinion.	55	Public Health Concerns	See the response to Comments 414 (worker protection program), and 431 (air monitoring). Also, the applicant's 12/11/19 technical deficiency response letter states that, " <i>The metabasalt processed at Pitts Quarry contains 4 to 12% crystalline silica. The facility adheres to the requirements of MSHA to control exposure to airborne contaminants and ensure the protection of employee health. See answer to items 21 and 22.</i> <i>As part of its industrial hygiene program, SGI collects and analyzes air samples for respirable dust on a quarterly basis. The results of this sampling are attached (Attachment L). Additional historic results associated with sampling and analyses for respirable dust are included in Appendix G.</i> Also, Per the applicant's 2/18/20 second technical deficiency response letter, " <i>The data provided in Attachment L to SGI's December 11, 2019 Technical Deficiency Letter Response demonstrate that SGI's operations do not and will not generate concentrations of airborne silica that would pose an undue risk to public health beyond the boundaries of the Charman facility. These data, which result from the analyses of samples collected from predominantly indoor sampling locations, indicate that the vast majority of samples collected by SGI over the past two decades contain silica levels that are below the threshold limit value ("TLV") adopted by MSHA for the protection of workers. The MSHA TLV assumes that mine workers can be safely exposed, without personal protective equipment, to respirable dust at the level of the TLV for a full 8-hour shift each and every work day of their careers.</i> <i>Furthermore, as noted above, the indoor air associated with SGI's mineral processing activities passes through a baghouse before being emitted outdoors. To the extent that any airborne silica particles might pass through or otherwise evade the baghouse, dilution in the ambient air prevents any meaningful concentrations of airborne silica from reaching off-site receptors, and certainly not at levels that would approach the TLV or otherwise pose a risk to public health.</i> DEP concurs with these conclusions.
429	Naturally Occurring Asbestos Poses a Significant Threat to Environmental and Human Health that SGI Failed to Disclose or Fully Evaluate.	18	Public Health Concerns	Please see the response to comment 431 (risk).
430	In a September 13, 2018 letter from Daniel Sammarco, Acting Director of the Department's Bureau of District Mining Operations, to FOTC Board Member Sue DeVeer, Mr. Sammarco responded to four primary concerns raised by FOTC. One of those concerns related to "the presence of naturally occurring asbestos in the metabasalt proposed for extraction at the Northern Tract Quarry." Mr. Sammarco stated that "the Department has requested SGI to investigate and determine if naturally occurring asbestos is present in the metabasalt and at what concentrations. SGI will submit their findings to the Department for evaluation." While FOTC appreciates the attention that the Department paid to this important public health issue, FOTC wants to ensure the Department follows through on this request of SGI and conducts a risk assessment to determine whether naturally occurring asbestos is present and, if so, whether the concentrations of naturally occurring asbestos pose a risk to public health. [footnote 1]	18	Public Health Concerns	Please see the response to comment 431 (risk).
431	[footnote 1 reads as follows] See Pan, XL, et al., Residential Proximity to Naturally Occurring Asbestos and Mesothelioma Risk in California, American Journal of Respiratory and Critical Care Medicine, Volume 172 (2005), available at: http://www.ncbi.nlm.nih.gov/pubmed/15976368 (concluding that residential proximity to naturally occurring asbestosis significantly associated with increased risk of malignant mesothelioma).	18	Public Health Concerns	Please see response to comment 445 (air monitoring). Risk is the magnitude of the probability of experiencing a deleterious health effect due to a quantified exposure to a hazard. A risk assessment cannot be performed without exposure data which is the measured ambient air concentration of asbestos fibers and is site specific. Nevertheless, the air monitoring action level of 0.01 f/cc in SGI's permit is sufficiently protective of human health as determined by US EPA's AHERA program.
432	Without such an analysis being completed, and a demonstration and finding that naturally occurring asbestos will not harm or degrade the environment or human health, SGI's application must be denied.	18	Public Health Concerns	Please see the response to comment 431 (air monitoring).
433	The Application Must be Denied because Air Pollution as a Result of Naturally Occurring Asbestos Has Not Been Properly Evaluated.	18, 32, 45	Public Health Concerns	Please see the response to comment 431 (air monitoring).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
434	In addition to anticipated noise impacts, Module 17 of the Application also addresses air pollution concerns as a result of the mining activity.	18, 45	Public Health Concerns	Please see response to comment 72 (asbestos), 370, 390 (dust), and 431 (risk).
435	Unfortunately, SGI's Application fails to address the release of and exposure to naturally occurring asbestos ("NOA") as a result of mining for metabasalt.	18, 45	Public Health Concerns	Please see response to comment 72 (asbestos), 370, 390 (dust), and 431 (risk).
436	NOA is an air pollutant with the potential to drastically degrade the people's right to clean air, as it will be carried off site through dust in the ambient air, on trucks, and workers' clothing.	18, 45	Public Health Concerns	Please see response to comment 72 (asbestos), 370, 390 (dust), and 431 (risk).
437	As a result of the likely degradation of air quality, NOA must be evaluated by the Department prior to authorizing surface mining activities.	18, 45	Public Health Concerns	DEP has considered and analyzed the presence of NOA. Please see the review memo issued with this permit and responses to comment 65, 72 (asbestos), 370, 390 (dust), and 431 (risk).
438	There are currently problems with fugitive dust emissions that cross off of SGI's property and affect the neighborhood.	9, 10, 11, 32, 55, 78	Public Welfare Issues	Please see the response to comment 390 (dust).
439	As a concerned citizen of Adams County and resident living less than a mile from SGI, I am writing to ask you to not allow SGI expansion. I have lived in Adams County my entire life; I literally grew up on the banks of Toms Creek near the covered bridge and now live on Scotch Trail and I see the effects from SGI. We constantly have green dust on our house and decks, we see the polluted water, we see the land being destroyed, we fear the harmful effects on our health.	20	Public Welfare Issues	Please see the response to comments 72 (asbestos), 370, 390 (dust), 428 (silica) and 431 (risk).
440	I listened to many complaints about the mill from people who do not live near the mill. I heard people say things such as dust problems, oil runoff, and blasting issues. I sat back while these accusations from people who do not live as close to the mill as I do because I myself have never had any of these issues in the last 14 years.	80	Public Welfare Issues	DEP duly notes this comment.
441	I live pretty far from the mine and I've never had green dust or the blast bother me a heck of a lot until this summer when SGI decided to provide grit or gravel to pave roads. And I sat on my farm, mowing my lawn like I do every weekend, in astonishment as every time a car came down that road, a cloud of green dust coated my barn and my house. Every time a car comes down the road. And I have to ask, if SGI understands that there's asbestos in that element, why in the world would they put it down this gravel on a public road? I would ask that that process cease until we know the answer.	83	Public Welfare Issues	Please see the response to comment 72 (asbestos), 370, 390 (dust), 428 (silica) and 431 (risk).
442	The air is often filled with green dust that settles on our porches and our paths.	11, 42, 78	Public Welfare Issues	Please see the response to comment 72 (asbestos), 370, 390 (dust), 428 (silica) and 431 (risk).
443	Specialty Granules, LLC (SGI) is operating at nuisance levels, and expansion under a new permit will increase the nuisances we endure. (noise, blasting and noxious air, night light, and truck traffic identified as nuisances).	32	Public Welfare Issues	Please see the response to comment 35 (historic), 38 (Anti-Degradation Supplement), 72 (asbestos), 83 (stream testing), 154 (stream survey), 182 (glare), 184 (nuisance), 214 (property value), 239 (asbestos), and 276 (natural diversity).
444	Naturally occurring asbestos may cause environmental or public health problems if/when it is released into waterways or soils from SGI's current or proposed operations.	9, 10, 11, 18, 32, 35, 45, 53, 55, 65, 66, 67, 68, 75, 83	Public Welfare Issues	Please see response to comment 239 (asbestos) and 250 (effluent characterization).
445	ASBESTOS: The sampling which was done by RJ Lee was not the kind which will be done by the EPA, or OSHA, or MSHA, and shows SGI's basic disregard for its workers and the public.	55	Environmental Testing	DEP agrees that passive ambient air sampling is not adequate. DEP agrees that the initial passive sampling was not accurate and SGI conducted subsequent active sampling and submitted it to DEP in February 2020 included in Exhibit I. DEP has determined that ISO 10312 TEM methodology should be used. DEP's determination is consistent with US EPA's guidance for Superfund sites which also uses 10312-2019-10 TEM protocol. Although DEP does not consider this active mine to be a Superfund site, it believes this methodology to be the most conservative and protective approach.
446	No standard sampling for asbestos is done passively in an open air environment.	55	Environmental Testing	Please see response to comment 445 (air monitoring).

Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit - Northern Tract Quarry

Comment #	Comment	Commenter #s	Category	Response
447	Any description of air sampling involves special cassettes and pumps which suck in a certain amount of air (usually in liters) under conditions of live measurement of air currents and weather conditions.	55	Environmental Testing	Please see response to comment 445 (air monitoring).
448	In fact the kind of sampling which could be considered appropriate would be that which is done for a superfund site.	55	Environmental Testing	Please see response to comment 445 (air monitoring).
449	Anyway, it shows how amateurish the RJ Lee Company's analysis was that they attempted to compare their result with a national average!	55	Environmental Testing	Please see response to comment 445 (air monitoring).
450	97-98 percent of all asbestos identified in the U.S. is the commercial variety which gets released by things like automobile brake linings.	55	Environmental Testing	DEP agrees that there are many other sources of asbestos in our society.
451	Conflating results from intensely urban areas with our rural environment is deceptive and unprofessional.	55	Environmental Testing	DEP considered site specific conditions in its analysis.
452	And the assumption that breathing and swallowing the average amount of asbestos is ok shows a perverse sort of attitude toward public health.	55	Environmental Testing	Please see response to comment 431 (risk).
453	SGI used inappropriate testing methodology for the asbestiform fibers.	14	Environmental Testing	Please see response to comment 445 (air monitoring).
454	The air sampling that they did at 10 locations for eight days, at best covered one ten trillionth of the sites air column. In other words there's almost no way that that testing produced anything meaningful.	14	Environmental Testing	Please see response to comment 445 (air monitoring).
455	Other than the fact they did discover some asbestiform fibers by some miracle. The only way that those tests - that testing could generalize is if you would assume the column of dust was absolutely uniformly distributed throughout the air column.	14	Environmental Testing	Please see response to comment 445 (air monitoring).
456	A one-time sample (even over a few days) is also inappropriate. Even if this one sample had been perfect it would not apply to the ongoing nature of the issue. Why did PA DEP let SGI present such a poor test without pointing out its obvious flaws? Your organization certainly has relevant expertise, or easy access to such expertise.	14	Environmental Testing	Please see response to comment 445 (air monitoring).
457	SGI's procedures manual specifies that their geologist look for Actinolite and mark it so that they can avoid disturbing it. This is good, but unlikely to be perfect. This does prove that SGI is aware of the danger! That's good. What evidence is there that the methods used by SGI are good enough to prevent the production of toxic waste during the entire process? A more appropriate method would be to do thorough testing of each new batch of debris after blasting or crushing or any other process that could release Asbestiform fibers. When Asbestiform fibers are found the debris should be treated as toxic waste before much of it gets into the atmosphere. Not to mention before the debris is used as road gravel! If there is no toxic waste produced, then these tests will not be expensive. If toxic waste is found the cleanup could be costly. However, if toxic waste is found then the cost of dealing with it should fall on SGI-failure to clean up toxic waste essentially transfers the cost to the workers and neighbors of the mine in terms of serious long-term health effects.	14	Environmental Testing	Due to the presence of Naturally Occurring Asbestos in the bedrock in the area of SGI's facility, DEP provided an enhanced level of scrutiny that involved increased interaction with and reliance upon all stakeholders. As a result of that process, the Cambria District Mining Office in consultation with other DEP offices applied its geologic, engineering, and other technical expertise to the voluminous data and other information and determined that SGI's quarrying activities would present no undue risk to public health or the environment. Nonetheless, the SGI permit also contains numerous detailed special conditions to address the specific issues presented by the SGI application for the Northern Tract Quarry. These special conditions and other requirements of the permit build in multiple layers of protection and conservatism, including a groundwater monitoring well network, monitoring of wetlands and certain species, air quality monitoring, enhanced dust mitigation measures, additional record keeping requirements, and an Asbestos Air Monitoring and Mitigation Plan.
458	Furthermore, they didn't use any anemometers on their testing gear. They have no information about the wind patterns at the mine site except for the prevailing winds which were measured miles away.	14	Environmental Testing	SGI purchased and installed a Lufft WS 800 UMB meteorological sensor that includes wind speed and direction measurements. This is specifically addressed on pages 9-10 of the February 18, 2020 technical deficiency response letter and Exhibit J.
459	Taken together, that means that was a complete waste and means nothing for the community's health. It might be that there wasn't anything in the air, but one tenth trillionth of that air was measured.	14	Environmental Testing	Please see response to comment 445 (air monitoring).
460	Also, one time sample, even though it were a few days, is also inappropriate to the problem. Even if this one sample had been perfect, it would not apply to the ongoing nature of the issue.	14, 87	Environmental Testing	Please see response to comment 445 (air monitoring).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
461	And my question to you, because I've heard you say that you were doing air testing just at that site at the entrance to the site. My question is, is the air testing being done down wind of the site or up wind of the site. Is that testing that you did done up wind of the site or down wind of the site?	86	Environmental Testing	Please see the response to comment 445 (air monitoring). Based on documents provided by the RJ Lee group, sampling was conducted at ten locations surrounding the facility. Sampling in this manner accounts for varying meteorological conditions throughout the sampling period. The sampling program is laid out in Appendix 7.3 Section 2.0 dated November 2018 and the locations were not altered in resampling that occurred in October 2019.
462	To generalize the RJ Lee testing, you have to assume all the dust is absolutely uniformly distributed, and that there are no wind patterns at the mine site other than the prevailing winds measured miles away. There is no evidence for either assumption, just the opposite.	14	Environmental Testing	Please see response to comment 445 (air monitoring) and 458 (weather station). Particulate pollution generally follows a dispersion curve with the values being highest near the source of the particulate matter then trending downwards towards background values. The larger the particles are, the faster they will drop out of the atmosphere. Based on documents provided by the RJ Lee group, sampling was conducted at ten locations surrounding the facility at a height of 6-8 feet. Sampling in this manner accounts for varying meteorological conditions throughout the sampling period. RJ Lee also documented that on-site meteorological data was collected during the sampling events.
463	RJ Lee defends their wholly inadequate test (full text of their email is Appendix A of this document) partly by saying their sensors were placed at the downwind perimeter of the mine property. This is not terribly relevant to the fact that the local wind patterns in this area are gusty, frequently changing direction, and seriously affected by the local topology. Anyone who hikes in these hills would understand this, and frankly it's obvious from looking at a topo map of the area that local wind currents could be significant given the uneven terrain at the site and the surrounding area.	14	Environmental Testing	Please see response to Comments 461 (air sampling locations), 462 (meteorological conditions).
464	RJ Lee says the dust is assumed to be "homogenous (well-mixed)" throughout the air column. This assumption implies a Uniform Distribution of toxic particles throughout the air, and anyone knowledgeable of the art will understand how ridiculous this assumption is under the specific circumstances of this test. This test was performed in a mountainous gusty region; during the rainiest season in living memory; with no attempt made to measure and quantify the microclimate wind conditions; with all sensors 10' off the ground; performed under place and time conditions set by the party with the strongest incentive to obtain a certain result (which, miraculously they obtained!).	14	Environmental Testing	Please see the response to comment 445 (air monitoring) and 462 (meteorological conditions).
465	RJ Lee also claims they are using EPA methodology for measuring air pollution. In some ways this may be true, but it ignores the fact that it isn't a particularly good approach for the specific issue they are supposedly studying. Air pollution measurements are often trying to gauge the effects of pollution that comes from thousands of separate sources (e.g. automobiles), or that may be coming from miles away (e.g. blown off a desert), etc. None of this applies to the SGI mine site. They know exactly where the suspected pollution sources are and could measure them directly, rather than place a tiny number of tiny sensors all ten feet off the ground.	14	Environmental Testing	Please see the response to comment 445 (air monitoring).
466	How high is the relevant air column? Could a toxic dust cloud be blown up to 20 ft off the ground and bypass the sensors?	14	Environmental Testing	Please see the response to comment 445 (air monitoring). DEP notes that it is unlikely that this situation could occur. Due to the distance between the source of the particulate pollution (either mining activities or crushing activities) and the sampling locations, a significant updraft would have to exist to completely bypass a sensor placed 8' off the ground. Based on our understanding of meteorological conditions and the local topography significant vertical mixing is unlikely to exist. Particulate pollution generated from ground based sources would likely be captured by a sensor placed 8' off the ground.
467	What realistic physical model of nearby dust dispersion supports the claim that the measurements here are in any way representative of the overall air quality?	14	Environmental Testing	Please see the response to comment 445 (air monitoring). Modeling is unnecessary, when the company is required to measure actual air concentrations of asbestos.
468	How on earth can such a model be realistic in the absence of any local wind measurements?	14	Environmental Testing	Please see the responses to comment 445 (air monitoring), 461 (air monitoring locations), 462 (meteorological conditions), and 467 (modeling).
469	Most importantly, however, the whole test is disingenuous because it assumes that 8 days in August of 2018 (8 days chosen by the mine operator) are forever and always representative of all other days, past and future-even though the mine processes new rock constantly. Each time the mine processes rock it risks releasing toxic waste, so an 8 day measurement can have no bearing on past and future days.	14	Environmental Testing	Please see the response to comment 445 (air monitoring).
470	The best that can be said about this test is that it was a Public Relations stunt rather than a good faith effort to address the community's often expressed, valid concerns.	14	Environmental Testing	Please see the response to comment 445 (air monitoring).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
471	Environmental testing should be done to better evaluate the risks from asbestos release from the existing quarry and/or expansion.	11, 18, 43, 44, 56, 57, 58, 65, 66, 67, 68, 83, 86	Environmental Testing	Please see the response to comment 393 (permit requirements), 431 (air monitoring), and 445 (air monitoring).
472	Is SGI in the Department of Environmental Protection Air Program? If so, what analysis of "fugitive air particles" has ever been done? Have tests been done as part of the approval process for the Northern Tract Quarry permit? If so, as a community, we need to know the results. (paraphrased)	11, 32	Environmental Testing	Please see the response to comment 72 (asbestos), 370, 390 (dust), 428 (silica) and 431 (risk).
473	Regarding asbestos, we respectfully request an independent investigation be conducted by Pa DEP and that this most serious investigation not be delegated to SGI. Again, with all due respect, "findings of SGI" simply will not satisfy the public's right to know whether asbestos might be or has been disturbed.	9, 73	Environmental Testing	Please see response to comment 445 (air monitoring).
474	With the potential for life threatening actinolite contamination that could affect the entire community, with potentially severe health and economic consequences, SGI must retain outside experts to regularly monitor and publicly report on asbestos fibers at the existing and new site, and the experts should use methodology reflecting the criticisms at the January public meeting.	28, 53, 77	Environmental Testing	Please see the response to comment 393 (permit requirements) and 431 (risk).
475	DEP or DCONR or another public agency which has staff with the relevant expertise should be regularly testing SGI's waste products for dust that contains hazardous levels of Asbestiform fibers and silica. SGI should reimburse the costs to the agency doing these tests, and this should be a condition of any permit allowing SGI to mine the Northern Tract. (This should also be a condition of continuing to mine, period, but I realize you may not be able to impose retroactive conditions.)	14	Environmental Testing	Please see the response to comment 393 (permit requirements) and 431 (risk).
476	PADEP should have a third party or themselves conducting testing according to generally accepted sampling protocol and ASTM standards.	11	Environmental Testing	Please see the response to comment 393 (permit requirements) and 431 (risk).
477	SGI's procedures manual does prove that SGI is aware of the danger. And that's also good.	14	Environmental Testing	Per the applicant's 12/11/19 technical deficiency response letter, "SGI previously provided the Department with its Suspect Minerals Identification and Management Guide (see SGI Response to Public Comments, dated November 12, 2018, pp. 62-63 & Appendix 7.2)." The most revision of the Guide is now dated 2/14/20.
478	For FOTC, the Department's attention to detail in this regard is particularly important and necessary in light of the misleading and inadequate evaluation conducted by SGI and described in Section 7 of SGI's November 12, 2018 Response to Public Comments received at the July 23, 2018 Public Meeting. While this sampling and analysis on its face responds to the community's concerns and the Department's request for further investigation, it is entirely inadequate to ensure protection of community health, air, water and safety for two major reasons.	18	Environmental Testing	Please see the response to comment 393 (permit requirements) and 431 (risk).
479	<i>SGI's Ambient Air Monitoring Fails to Capture Impacts from the Northern Tract:</i> The second reason that SGI's response to the Department's request for further investigation is inadequate is because the ambient air monitoring that SGI conducted does not accurately identify or evaluate impacts from development of the proposed Northern Tract.	18	Environmental Testing	Please see response to comment 461 (air monitoring) and 462 (meteorological conditions).
480	Appendix 7.3 of SGI's Responses describes the perimeter air sampling that was conducted. As an initial matter, this sampling was conducted over a very limited period of 8 days and only 10 samples were collected. Given operations at the site, which have continued for several decades, this extremely limited time period and limited number of samples is not sufficient to draw any reasonable conclusions.	18	Environmental Testing	Please see response to comment 445 (air monitoring).
481	Further, over this limited 8 day period there were "several periods of rain." While this is certainly not unusual, neither are weeks without rain. Given that one of the primary methods utilized for controlling asbestos dispersion is water, the periods of rain across these limited 8 days indicate that it was not a true representative sample.	18	Environmental Testing	Please see response to comment 445 (air monitoring).

**Evaluation of Public Comments Regarding the SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

Comment #	Comment	Commenter #s	Category	Response
482	At the very least SGI must be required to indicate exactly how much rain fell and over which specific time periods.	18	Environmental Testing	Please see response to comment 445 (air monitoring).
483	In addition, Appendix 7.3 indicates that the "general direction of the wind during this period was from the west to southwest blowing toward the east/ northeast." However, according to Figure 1, the identified sampling locations are primarily along the western or southern side of active mine operations. Therefore, given that the wind was generally blowing particulates away from the monitors, the results are not surprising.	18	Environmental Testing	Please see response to comment 445 (air monitoring) and 458 (weather station). Given the placement of the sampling locations several of those would have been considered "downwind" based on the meteorological conditions during the sampling event.
484	Overall, SGI's ambient air monitoring clearly fails to capture impacts from the Northern Tract.	18	Environmental Testing	Please see response to comment 461 (air monitoring) and 462 (meteorological conditions).
485	Accordingly, the only evaluation of air pollution concerns occurring at the Northern Tract would appear to be based on the information supplied in Module 17.	18, 45	Overall Permitting Issues	Please see response to comment 72 (asbestos), 370, 390 (dust), and 431 (risk).

**List of Commenters on Draft SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	New Commenter #	Last Name	First Name(s)	Middle Initial	Honorific	Title	Position	Organization	Address 1	Address 2	e-mail	written or oral?	Date on Letter	Date Received by DEP
2	1	Alering	Constance	S.					18 Yankee Mt. Ln	Fairfield, PA 17320		written	8/1/2018	8/8/2018
3	2	Andes	Chet						136 White Barn Lan	Fairfield, PA 17320	andeschet@gmail.com	oral		7/23/2018
4	2	Andes	Chet						136 White Barn Lan	Fairfield, PA 17320	andeschet@gmail.com	written	8/6/2018	8/6/2018
5	3	Andes	Jennifer						136 White Barn Lan	Fairfield, PA 17320		written	8/6/2018	8/6/2018
6	3	Andes	Jennifer						201 Gum Springs Road	Fairfield, PA 17320		oral		1/30/2019
7	4	Braun	Bonnie						2655 Pumping Station Road	Fairfield, PA 17320		written	7/30/2018	8/2/2018
8	5	Browning	Buck									oral		1/30/2019
9	6	Bruno	Mike								miketrain2@aol.com	written	2/10/2019	2/10/2019
10	7	Christensen	Dennis						1110 Iron Springs Road	Fairfield, PA 17320		oral		7/23/2018
11	8	Desjardins	Juliann								edaplus@icloud.com	written	7/24/2018	7/24/2018
12	9	DeVeer	Sue						700 Iron Springs Road	Fairfield, PA 17320		oral		7/23/2018
13	9	DeVeer	Sue						700 Iron Springs Road	Fairfield, PA 17320		written	8/4/2018	8/4/2018
14	9	DeVeer	Sue					Friend of Toms Creek	PO Box 611	Fairfield, PA 17320	Info@friendsoftoms creek.org	written	10/4/2018	10/9/2018
15	9	DeVeer	Sue						700 Iron Springs Road	Fairfield, PA 17320		oral		1/30/2019
16	9	DeVeer	Sue						700 Iron Springs Road	Fairfield, PA 17320	suedeveer@juno.com	written	2/11/2019	2/13/2019
17	10	Dull	Catherine						12530 Monterey Lane	Blue Ridge Summit, PA 17214	cathydull55@gmail.com	written	8/1/2018	8/1/2018
18	11	Dull	Jeffrey						12530 Monterey Lane	Blue Ridge Summit, PA 17214		oral		7/23/2018
19	11	Dull	Jeffrey						12530 Monterey Lane	Blue Ridge Summit, PA 17214		written	8/1/2018	8/1/2018
20	11	Dull	Jeffrey						12530 Monterey Lane	Blue Ridge Summit, PA 17214		oral		1/30/2019
21	12	Flood	Keith						513 Gum Springs Road	Fairfield, PA 17320	keflood11@gmail.com	written	2/11/2019	2/12/2019
22	13	Flood	Tracie						513 Gum Springs Road	Fairfield, PA 17320	tflood11@gmail.com	written	2/11/2019	2/12/2019
23	14	Frost	Clifford						301 Mount Hope Road	Fairfield, PA 17320	clifford.frost@gmail.com	oral		1/30/2019
24	14	Frost	Clifford						301 Mount Hope Road	Fairfield, PA 17320	clifford.frost@gmail.com	written	8/5/2018	8/8/2018
25	15	Geesaman	Jeffrey				Township Supervisor		11403 Brookdale, Drive	Waynesboro, PA		oral		1/30/2019
26	16	Gorman	John						12894 Monterey Lane	Blue Ridge Summit, PA 17214		written	8/2/2018	8/6/2018
27	17	Griffin	George	G.B.					14621 Charmain Road, P.O.Box 425	Blue Ridge Summit, PA 17214	ggbriffin@gmail.com	written	2/12/2019	2/12/2019
28	18	Hamilton	Ryan	E		Esq.	Supervising Attorney	Fair Shake Environmental Legal Services	3495 Butler Street, Suite 102	Pittsburgh, PA 15201	rhamilton@fairshake-els.org	written	2/11/2019	2/11/2019
29	19	Hartlaub	Larry								lhartlaub@centurylink.net	written	2/10/2019	2/10/2019
30	20	Hess	Alison								hess.alison@yahoo.com	written	2/11/2019	2/11/2019
31	21	Heyward	Annie						300 Wilderness Lane	Fairfield, PA 17320	pmh3220@aol.com	written	7/30/2018	8/3/2018
32	22	Heyward	Catherine						3220 Morrison Street NW	Washington, DC 20015	catherine.heyward19@gmail.com	written	7/30/2018	8/3/2018
33	22	Heyward	Catherine						3220 Morrison Street NW	Washington, DC 20015	catherine.heyward19@gmail.com	written	2/10/2019	2/12/2019
34	23	Heyward	James						300 Wilderness Lane	Fairfield, PA 17320	pmh3220@aol.com	written	7/30/2018	8/3/2018
35	24	Heyward	Maggie						3220 Morrison Street NW	Washington, DC 20015	maggie_heyward@yahoo.com	written	7/30/2018	8/3/2018
36	24	Heyward	Maggie						3220 Morrison Street NW	Washington, DC 20015	maggie_heyward@yahoo.com	written	2/10/2019	2/12/2019

**List of Commenters on Draft SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	New Commenter #	Last Name	First Name(s)	Middle Initial	Honorific	Title	Position	Organization	Address 1	Address 2	e-mail	written or oral?	Date on Letter	Date Received by DEP
37	25	Heyward	Peter						3220 Morrison Street NW	Washington, DC 20015	maggie_heyward@yahoo.com	written	7/30/2018	8/3/2018
38	25	Heyward	Peter						3220 Morrison Street NW	Washington, DC 20015	maggie_heyward@yahoo.com	written	2/10/2019	2/13/2019
39	26	Heyward	Philip						300 Wilderness Lane	Fairfield, PA 17320	pmh3220@aol.com	written	7/30/2018	8/3/2018
40	27	Hoff	Ellen								Phoff@gsblaw.com	written	2/12/2019	2/15/2019
41	28	Hoff	Paul								Phoff@gsblaw.com	written	2/12/2019	2/15/2019
42	29	Hovis	Michelle									written	2/17/2014	8/8/2018
43	30	Jacobs	Frederick						23 E. Delaware Avenue	Pennington, NJ 08534	frederickjacobsjd@gmail.com	written	7/30/2018	8/3/2018
44	30	Jacobs	Frederick						23 E. Delaware Avenue	Pennington, NJ 08534	frederickjacobsjd@gmail.com	written	2/10/2019	2/13/2019
45	31	Jaeger	Karen						14946 Charmain Road	Blue Summit, PA 17214	karen.s.jaeger@gmail.com	written	2/10/2019	2/10/2019
46	32	Keahey	Hazel						P.O.Box 328	Blue Ridge Summit, PA 17214	hckeahey@verizon.net	oral		7/23/2018
47	32	Keahey	Hazel						P.O.Box 328	Blue Ridge Summit, PA 17214	hckeahey@verizon.net	written	7/31/2018	8/6/2018
48	32	Keahey	Hazel						P.O.Box 328	Blue Ridge Summit, PA 17214	hckeahey@verizon.net	oral		1/30/2019
49	32	Keahey	Hazel	C					P.O.Box 328	Blue Ridge Summit, PA 17214	hckeahey@verizon.net	written	2/12/2019	2/12/2019
50	33	Keahey	Thomas						120 Snyders Hollow Lane	Blue Ridge Summit, PA 17214		oral		1/30/2019
51	34	Kellet	Paul						46 Middle Creek Road	Fairfield, PA 17320		oral		7/23/2018
52	34	Kellet	Paul						46 Middle Creek Road	Fairfield, PA 17320		oral		1/30/2019
53	35	Kilgour	Joanne				Chapter Director	Sierra Club			joanne.kilgour@sierraclub.org	written	2/13/2019	2/13/2019
54	36	Kimball	Bruce						2391 Iron Springs Road	Fairfield, PA 17320	kimballbruce@yahoo.com	written	8/4/2018	8/8/2018
55	37	Lane	Mary						615 Fairfield Station Road	Fairfield, PA 17320		oral		1/30/2019
56	38	Laramie	John	K					30 Lakeside Drive	Fairfield, PA 17320	pegnkip@cox.net	written	2/10/2019	2/12/2019
57	39	LaRue	Steve						21210 Winding Creek Rd.	Hagerstown, MD	slarue@cwiliamhetzer.wm.edu	oral		1/30/2019
58	40	Leahy	Bill								whleahy2@gmail.com	oral		1/30/2019
59	41	Merryman	Scott						1682 Iron Springs Road	Fairfield, PA 17320		written	7/27/2018	7/30/2018
60	42	Mickley	Charles						2390 Mount Hope Road	Fairfield, PA 17320	cmickley@comsystems-llc.com	written	2/11/2019	2/11/2019
61	43	Miller	Edward	T.					12455 Monterey Circle	Blue Ridge Summit, PA	eternil@aol.com	written	2/14/2019	2/21/2019
62	44	Miller	Noel	C.					12455 Monterey Circle	Blue Ridge Summit, PA	eternil@aol.com	written	2/14/2019	2/21/2019
63	45	Monahan	Rose	K.				Fair Shake Environmental Legal Services (and Friends of Tom's Creek)	3495 Bulter Street Suite 102	Pittsburgh, PA 15201		written	7/3/2018	7/25/2018
64	46	Morrison	Willard	P.					700 Iron Springs Road	Fairfield, PA 17320		written	8/4/2018	8/4/2018
65	47	Myers	Rhonda	S							ar5mvers@comcast.net	written	2/11/2019	2/11/2019
66	48	Newlin	Bill						3026 Newark St. NW	Washington, DC 20015	bill@newlin.org	written	8/10/2018	8/14/2018
67	49	Painter	Joe						120 Lightning Trail	Fairfield, PA 17320		oral		7/23/2018
68	50	Paolini	David						2150 Iron Springs Road	Fairfield, PA 17320		oral		7/23/2018
69	51	Pham	Chi						2391 Iron Springs Road	Fairfield, PA 17320	c.pham@live.com	written	8/1/2018	8/8/2018
70	52	Poulson	Charlie									oral		1/30/2019
71	53	Rogers	Marvin						515 Gum Springs Road	Fairfield, PA 17320	marvin-rogers@live.com	written	7/27/2018	8/2/2018
72	53	Rogers	Marvin						515 Gum Springs Road	Fairfield, PA 17320	marvin-rogers@live.com	written	2/9/2019	2/15/2019
73	54	Rogers	Rachel						515 Gum Springs Road	Fairfield, PA 17320	Rachel-rogers@live.com	written	7/27/2018	8/2/2018
74	54	Rogers	Rachel						515 Gum Springs Road	Fairfield, PA 17320	Rachel-rogers@live.com	written	2/9/2019	2/15/2019
75	55	Rogers-Frost	Sherry						301 Mount Hope Road	Fairfield, PA 17320	s.rogersfrost@gmail.com	written	8/5/2018	8/8/2018
76	55	Rogers-Frost	Sherry						301 Mount Hope Road	Fairfield, PA 17320	s.rogersfrost@gmail.com	oral		1/30/2019
77	55	Rogers-Frost	Sherry						301 Mount Hope Road	Fairfield, PA 17320	s.rogersfrost@gmail.com	written	2/13/2019	2/13/2019
78	56	Rothschild	Donald						300 Wilderness Lane	Fairfield, PA 17320	pmh3220@aol.com	written	7/30/2018	8/3/2018
79	57	Rothschild	Gideon						300 Wilderness Lane	Fairfield, PA 17320	pmh3220@aol.com	written	7/30/2018	8/3/2018
80	58	Rothschild	Sam						300 Wilderness Lane	Fairfield, PA 17320	pmh3220@aol.com	written	7/30/2018	8/3/2018

**List of Commenters on Draft SGI Large Non Coal Surface Permit and NPDES Permit -
Northern Tract Quarry**

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	New Commenter #	Last Name	First Name(s)	Middle Initial	Honorific	Title	Position	Organization	Address 1	Address 2	e-mail	written or oral?	Date on Letter	Date Received by DEP
81	59	Roy	Stephen						67 Meadowlark Trail	Fairfield, PA 17320	yorevetssec@protonmail.com	oral		1/30/2019
82	59	Roy	Stephen						67 Meadowlark Trail	Fairfield, PA 17320	yorevetssec@protonmail.com	written	2/12/2019	2/13/2019
83	60	Royer	R. Lee			P.L.S.			10764 Buchanan Trail East	Waynesboro, PA 17268		written	2/11/2019	2/13/2019
84	61	Sellers	William	W			President & CEO	Journey Through Hallowed Ground Partnership	P.O. Box 77	Waterford, VA 20197	HallowedGround.org	written	10/17/2018	10/19/2018
85	62	Shank	Christopher									written	8/6/2018	8/6/2018
86	63	Shank	Ken									written	8/6/2018	8/6/2018
87	64	Shank	M. Patricia									written	8/6/2018	8/6/2018
88	65	Shivers	Frank						3220 Morrison Street NW	Washington, DC 20015	maggie_heyward@yahoo.com	written	7/30/2018	8/3/2018
89	65	Shivers	Frank						3220 Morrison Street NW	Washington, DC 20015	maggie_heyward@yahoo.com	written	2/10/2019	2/12/2019
90	66	Shivers	Lottie									written	7/30/2018	8/3/2018
91	66	Shivers	Lottie						3220 Morrison Street NW	Washington, DC 20015	maggie_heyward@yahoo.com	written	2/10/2019	2/12/2019
92	67	Shivers	Natalie						23 E. Delaware Avenue	Pennington, NJ 08534	maggie_heyward@yahoo.com	written	7/30/2018	8/3/2018
93	67	Shivers	Natalie						23 E. Delaware Avenue	Pennington, NJ 08534	Natalieshivers@gmail.com	written	2/10/2019	2/10/2019
94	68	Shivers	Philip						41 Warrenton Road	Baltimore, MD 21209		written	7/30/2018	8/3/2018
95	68	Shivers	Philip						42 Warrenton Road	Baltimore, MD 21210		written	2/11/2019	2/13/2019
96	69	Simchak	Jane						12469 Monterey Circle	Blue Ridge Summit, PA 17214	janefsimchak@gmail.com	written	8/5/2018	8/5/2018
97	70	Smith	Patricia	T			Secretary and Board Member	Fairfield Municipal Authority	108 W. Main Street, P.O.Box 705	Fairfield, PA 17320	fairfieldmunicipal@comcast.net	written	2/6/2019	2/8/2019
98	71	Smithwick	Thomas	A.			President	Big Spring Watershed Association	PO Box 52	Newville, PA 17241		written	1/28/2019	1/28/2019
99	72	Strahler	John						285 Jacks Mountain Road	Fairfield, PA 17320		written	2/2/2019	2/6/2019
100	73	Sturtevant	Al							Blue Ridge Summit, PA	lsturtevant@stalbansschool.org	written	2/11/2019	2/11/2019
101	74	Sturtevant	Emily							Blue Ridge Summit, PA	leesturtevant@gmail.com	written	8/1/2018	8/6/2018
102	74	Sturtevant	Emily							Blue Ridge Summit, PA	leesturtevant@gmail.com	written	2/11/2019	2/11/2019
103	75	Sturtevant	Lee							Blue Ridge Summit, PA	leesturtevant@gmail.com	written	2/11/2019	2/11/2019
104	76	Swope	Dave									oral		1/30/2019
105	77	Trachen	Glenn	N.					PO Box 465	Burlington, NC 27216				
106	78	Ungar	Sanford						377 Gum Springs Road	Fairfield, PA 17320		oral		7/23/2018
107	78	Ungar	Sanford						377 Gum Springs Road	Fairfield, PA 17320		written	7/23/2018	8/2/2018
108	78	Ungar	Sanford						377 Gum Springs Road	Fairfield, PA 17320		oral		1/30/2019
109	79	Walls	Brent						15307 Dellinger Road	Williamsport, MD 21795		oral		7/23/2018
110	79	Walls	Brent						15307 Dellinger Road	Williamsport, MD 21795		oral		1/30/2019
111	80	Wantz	Jessica						95 Sour Mash Trl.	Fairfield, PA 17320		oral		1/30/2019
112	81	Watson	Matthew	R					11237 Furnace Road	Waynesboro, PA 17268	matthew.watson@specialtygronules.com	oral		1/30/2019
113	82	Wentling	Deb						26 Raven Trail	Fairfield PA, 17320	wentling@mmary.edu	oral		1/30/2019
114	83	Whitcomb	Lionel						2545 Mount Hope Road	Fairfield, PA 17320		oral		7/23/2018
115	83	Whitcomb	Lionel						2545 Mount Hope Road	Fairfield, PA 17320		oral		1/30/2019
116	84	Williams	Duane	E					1091 Fairfield Station Road	Fairfield, PA 17320	dwilliams@pa.net	written	2/12/2019	2/13/2019
117	85	Willman	Todd									oral		1/30/2019
118	86	Young	Audrey						12664 Monterey Lane	Blue Ridge Summit, PA 17214	Audrey.young@hklaw.com	written	8/5/2018	8/5/2018
119	86	Young	Audrey						12664 Monterey Lane	Blue Ridge Summit, PA 17214		oral		1/30/2019
120	87	Young	Mona						461 Old Waynesboro Pike	Fairfield, PA 17320		oral		7/23/2018
121	87	Young	Mona						461 Old Waynesboro Pike	Fairfield, PA 17320		oral		1/30/2019
122	88	Zabawa	Anne				President	Historic Adams County Preservation Society	G.A.R. Hall, 53 East Middle Street, P.O. Box 4611	Gettysburg, PA 17325	HGACOnline.org	written	8/3/2018	8/6/2018