



Pottsville District Office

CERTIFIED MAIL NO.7099 340000124452 2396

Uday Patankar
Vice President of Environmental & Public Affairs Gibraltar Rock, Inc.
355 Newbold Road
Fairless Hills, PA 19030

Re: Technical Deficiencies
Gibraltar Rock Quarry Operation Application No.46030301
New Hanover Township, Montgomery County

Dear Mr. Patankar:

The Department has reviewed your application and has determined that the following significant deficiencies exist and need to be corrected, and also the following additional information is required:

1. In reference to the Module 4: Areas Where Mining is prohibited or limited, please be advised that the support activities are an integral part of mining activities. Please check the appropriate adequate boxes and demonstrate compliance with 25 PA Code Section 77 .504(b) (relating to exceptions to the distance limitations).
2. Please submit the recorded original Contractual Consent of Landowner (CCL) documents. Use a valid form 5600-FM-MROO59 Rev. 5/98, "Supplement C". Cover all areas to be affected with adequate CCL's.
3. Please correct the discrepancies between the property numbers shown on the Site Location Map dated 2/20/03 (part of a Contractual Consent of Landowner) and the property numbers shown on the Exhibit 5 Property Interests/Right of Entry dated 2/28/03 (for example no.47-00-000 12-00-4, 47-00- 00016-00-9 do not match). Please be advised that Lands/properties no.47-00-02688-00-1 and no.47- 00-01112-50-6 proposed to be affected must be supported with an adequate contractual consent of landowner document and lease agreement (when applicable).
4. The stream, which was the subject of a pre-application meeting of January 7, 2003, and which was classified by the P A Fish and Boat Commission as perennial, has not been addressed in the application as perennial. Please revise your application accordingly. No mining activity can be proposed within a perennial or intermittent stream and within 100' (30.48 In) of the bank of a perennial or intermittent stream, except for any necessary support activities for which a variance will be considered by the Department. If any activities are proposed within the referenced above areas then a variance request outlining areas proposed to be affected must be submitted to the Department.
5. Please delineate the wetland located in the central part of the southern section of proposed permit area. Please submit a mitigation plan for the referenced wetland if you intend to affect this wetland in any way.

6. Some of the occupied dwellings, structures, utilities and streams that are located within the proposed permit area and within 1000' (305 m) of the proposed permit area are not shown on the maps. Please show all of the above referenced items on your maps. Please also remember to include names of the owners and present occupants, and the current use; show restricted or variance areas.
7. Numerous occupied dwellings and commercial and industrial buildings are located within 300' (91.44 m) of the areas proposed to be affected by support mining activities. Please submit signed notarized waivers from the owners of dwellings or buildings, consenting to the activities within 300' (91.44 m) of the dwelling or building. Pursuant to 25 PA Code Section 77. 504 (b)(2) you are entitled to submit information to the Department to attempt to demonstrate that special circumstances warrant support areas within the distance limitations. That information shall demonstrate that the public health and safety will not be endangered, that the environment and the interests of the public and the landowners affected thereby will be adequately protected and that there are no feasible or prudent alternatives to conducting those aspects or the activity within the distance limitation.
8. Your access road to the site is located within 300' (91.44 m) of occupied dwellings. Pursuant to 25 P A Code Section 77. 504(b)(2) you are entitled to submit information to the Department to attempt to demonstrate that special circumstances warrant support areas to occur within the distance limitations. That information shall demonstrate that the public health and safety will not be endangered, that the environment and the interests of the public and the landowners affected thereby will be adequately protected and that there are no feasible or prudent alternatives to conducting those aspects or the activity within the distance limitation.
9. The areas to be bonded for support (activities) proposed in this application are within 100' (30.48 ill) of the outside line of right-of-way of the following public highways: Route 73, Route 663, Church Road, Hoffmansville Road and Colefish Road. Please submit signed notarized waivers from entities having jurisdiction over the above referenced roads, consenting to the activities within 100' (30.48 ill). Pursuant to 25 PA Code Section 77.504(b)(2) you are entitled to submit information to the Department to attempt to demonstrate that special circumstances warrant support areas to occur within the distance limitations. That information shall ensure that the public health and safety will not be endangered, that the environment and the interests of the public and the landowners affected thereby will be adequately protected and that there are no feasible or prudent alternatives to conducting those aspects or the activity within the distance limitation.
10. The following maps: Module 6.2 Environmental Resources Map, Module 9: Operations Map and Module 18: Land Use and Reclamation Map must show all restricted and variance areas. Please also outline right-of ways for highways and utilities.
11. The Department received "Groundwater Pumping Evaluation, Proposed Quarry Area, August 3 Supplement, prepared by EarthRes Group. That report was submitted five (5) months after the application. We reviewed this report and have some concerns. Please be advised that we need to meet with you and your consultants to discuss the report, particularly how the groundwater modeling study should be used to address items 12,40 and 41 below.
12. Address in detail the possible effects from the proposed mining on the hydrologic balance (streams, ponds, wetlands, etc.) in particular the potential to adversely affect the quality and quantity of any water supplies located within anticipated zone of quarry influence (cone of depression). Please include in your hydrogeologic balance evaluation the anticipated depletion of groundwater reserves for the proposed large residential complex for senior citizens/ nursing home and the school proposed by Archdiocese of Philadelphia. Furthermore, an water supplies and sources located within 1000'

(305 m) from the proposed permit area, and within the anticipated cone of depression must be identified. Additionally, all available information related to well construction, *yield*, water quality, and a viable plan for restoration or replacement of water supplies, which may be detrimentally affected by mining activities, must be submitted in the permit application. Also, please provide a groundwater monitoring plan; be advised that the Department will require monthly measurement of groundwater elevations within and around the quarry.

13. Please provide the static water elevations for the well/log of boring no. OW-4 and well/log of boring no. OW -6. In reference to page 4 of 4 included with the well/tog of the boring no. OW-6, explain what are the correct numbers in this well/log boring data.
14. In reference to your Exhibit 6.2 map, there are two (2) wells with the same number TB-C. Please address this discrepancy.
15. Please include the surface/top of casing elevations with all well logs and drilling logs.
16. Please obtain a Highway Occupancy Permit to access the State Route 73 and a permit to access Hoffmansville Road from the P ADOT and New Hanover Township. Please secure necessary permits/waivers to affect areas within right-of-way (if any areas are proposed to be bonded here) and within 100' (30.5 m) of the right-of-way. Please obtain adequate permits for construction and operation of a tunnel under the road (Hoffmansville Road) for a conveyor and culverts. Please provide copies of the referenced permits to the Department.
17. Please provide a plan and calculations to demonstrate that adequate amounts of backfill material are stockpiled on the site prior to advancing upper lifts into the "backfill zone". Explain how high walls will be advanced on upper lifts into the "backfill zone". Provide calculations on available/required backfill, and excess overburden.
18. Please be advised that perimeter berms must be a minimum of 15' (4.57 m) inside the permit boundary (i.e. outside toe of a berm to the boundary) or any bonded areas. Provide a detailed time schedule for construction of referenced perimeter berms and tie this into your final reclamation plan
19. Clearly show the location of all E & S (erosion & sedimentation) controls on the plans for overburden storage areas (i.e. sedimentation traps, collection ditches or other E & S controls outside the berm). In reference to drainage structures, please show and describe the means for intercepting all on-site runoff and conveying it to sediment removal facilities for overburden storage areas, berms, plants areas, support areas, etc.
20. Please provide in more detail, phase by phase, a sequence of operations, specifying placement of E & S controls and structures prior to work in areas draining to these controls.
21. Please specify in more detail, regular inspections and cleanout of all sediment trap areas, disposal of collected sediment, and that the controls will be maintained until all tributary areas have been stabilized.
22. Please provide a plan/profile of a stabilized site entrance at all access points/roads.
23. Please provide sections, details, controls, stabilization and drainage requirements for all haul roads to be constructed or relocated.
24. In reference to drainage structures, please provide a complete detail for each type of channel, swale, ditch, terrace, etc. Show and specify matting.

25. In reference to drainage structures, please provide scour protection at all pipe outlets. Complete calculations (computer table) for culvert #2 and check table for culvert # 3.
26. In reference to the sediment trap coverage areas, please clearly outline the drainage areas for each basin/trap and discuss if and how these areas will change as site work progress. Design the worst case. Multiple sediment basin/traps cannot be designed in a series configuration.
27. In reference to the sediment trap coverage areas, please show all calculations for storage volume, outlet capacity, pipe flows, draw down, etc.
28. In reference to the sediment trap coverage areas, please provide calculations showing that the combined outlet capacity meets or exceeds 2 cubic feet per second/acre (0.13989 cubic meters per second/hectare) of drainage area.
29. In reference to the sediment trap coverage areas, please provide all necessary information for construction of the basin/trap in either typical drawing or tabular form.
30. In reference to sediment basins [drainage areas of more than 5 acres (2.02 hectares)], please be advised that it is necessary to address these controls as basins for support area, overburden, initial cut areas, etc.
31. Please provide dimensions of all proposed sediment/treatment basins.
32. Please add more valves for better flexibility in treatment pond piping.
33. In reference to sediment traps [drainage areas of 5 acres (2.02 hectares) or less], please be advised that more sedimentation traps may be required. Provide a minimum volume of 2,000 cubic feet/acre (139.89 cubic meters/hectare) to the overflow crest. Specify cleanout when sediment trap is 1/3 full of sediment. Address dewatering (i.e. stone berm) and show that the overflow will be stable under the expected flow. Provide dimensions of any additional sediment traps.
34. In reference to revegetation/stabilization, please clearly state that all disturbed areas will be stabilized: permanently or temporarily, depending on work remaining, within 20 days of the most recent earth moving activity in that area; weather permitting. Include a statement indicating that all stockpiles, basins/traps, roads, earth berms, and channels must be stabilized accordingly immediately upon placement.
35. Contact the PA Fish and Boat Commission for any stream work proposed, and, per their approval, please provide complete details and scheduling for all stream work. Small streams should be diverted around the work area to minimize sediment pollution. All work in stream must be completed, without unnecessary delays, as quickly as possible. Stockpile all necessary material to complete work prior to beginning in stream disturbance.
36. Please address, in more detail any plans/controls for concrete plant area, plans for conveyor (road stream crossings in concept). Include erosion & sedimentation (E&S) control details for construction of this facility. Use silt fence (even SUPER silt fence) only for temporary E&S control.
37. Please address items 17.2 (a. through h.) Processing Facilities, part of Module 17: Air Pollution and Noise Control Plan, so it is consistent with mining operations plan. Please be aware that you must obtain these AQ permits prior to constructing and operating these proposed facilities. We are aware that you have discussed the scope of a separate Air Quality Permit with SERO for mineral

processing facilities (including the crusher, the screener, the hot-mix asphalt plant and the ready mix asphalt plant).

38. On March 14 the Department forwarded to you a letter from Pennsylvania Historical and Museum Commission requesting submission of additional information for their review. Please inform me of the status of your interaction with PHMC on these issues.
39. The Department has not yet received comments from PA Game Commission in reference to your permit application. Please contact Jeffery Kost, P .G. of the PA Game Commission to facilitate the application reviewing process.
40. Please design an adequate wetlands and streams monitoring system (piezometers and flow weirs). The monitoring system has to be capable to detect any incoming potential degradation to wetlands and streams from the quarry dewatering. Propose a detailed plan on how to maintain healthy wetlands' and streams' environment during mining activities and after reclamation is completed.
41. Please prepare a functions and values assessment of wetlands located within the proposed SMP within 1000' (305 m) of proposed SMP and quarry's cone of depression.
42. Submit a notarized letter(s) from landowner(s) approving the proposed land use change, pursuant to 25 p A Code Section 77.462.
43. Submit a bonding application.
44. When resubmitting the revised application, please submit an original and two (2) copies for distribution.

Should you have any questions regarding the identified deficiencies, please contact me to discuss your concerns or to schedule a meeting. The meeting must be scheduled within the 30 days allotted for your reply, unless otherwise extended by the Department. Upon receipt of your submission, the Department will continue its evaluation of your application. You will be notified later if deficiencies remain in your application. You will have a final opportunity to correct any deficiencies, which will be itemized in a pre-denial letter, before the Department makes a final determination.

If you believe the stated deficiencies are not significant, you have the option of declining and asking the Department to make a decision based on the information you have already made available.

If you choose this option, you should explain and justify how your current submission satisfies the deficiencies noted above. Please keep in mind that if you ignore this request or fail to respond to all of the deficiencies listed above by December 14, 2003, your application may be denied.

Sincerely,



Ignacy F. Nasilowski, P.G.
Licensed Professional Geologist
District Mining Operations

cc: Consultant, EarthRes Group, Inc.