

Erskine Environmental Consulting

Geologic Investigations Hazardous Materials Naturally Occurring Asbestos

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Gentlemen,

This letter is a request to obtain the Standard Operating Procedures (SOP's) for the asbestos differential counting method utilized by EMSL Laboratories and the R.J. Lee Group for the identification of asbestos at the Rockhill Quarry site. It appears that the R.J. Lee Group has already requested this information for the test results submitted by EMSL Laboratories (see the cover letter in: *Transmittal of Qualitative Geologic Survey Report, Rock Hill Quarry, Hanson Aggregates Pennsylvania LLC, SMP # 7974SM1, East Rockhill Twp., Bucks Co., PA*).

Both laboratories reported the application of EPA Method 600/R-93/116 to report asbestos in the Rockhill quarry materials. However, this method does not specify the differential counting protocols to selectively separate particles that appear to have been applied by both laboratories. R.J. Lee recently submitted a letter with asbestos definitions and other selected citations from regulations, presumably as a justification to use differential counting, but an actual SOP where the procedures used to implement these criteria was not included (see: *Transmittal of RJ Lee Group November 25, 2019 Letter, Rock Hill Quarry, Hanson Aggregates Pennsylvania LLC, SMP # 7974SM1, East Rockhill Twp., Bucks Co., PA*).

It is apparent that the test results from each lab were not consistent, as would normally be expected if the approved test method was applied as designed. All laboratories should have an internally-developed SOP to assure consistency, accuracy and reproducibility, and the recipients of test data are entitled to the procedures that form the basis of test results. I believe that it is in all party's interest to allow review of the internal test methodologies so that the reasons for the disparity in results can be identified, the results can be validated, and an informed decision by the Pennsylvania DEP relating to the location and concentration of asbestos at the Rockhill quarry can be made.



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Cc:

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