

April 1, 2025

Heidelberg Materials Northeast, LLC
7535 Windor Drive
Allentown, PA 18106

Re: Technical Deficiencies
Application No. 7974SM1C12 & C13
NPDES Permit No. PA0594121 Renewal and Modification
Rock Hill Quarry Operation
East Rockhill Township, Bucks County

Dear Operator:

The Department has reviewed your application and has determined that the following significant deficiencies exist:

1. Water Quality Assessment – Anti Degradation Sampling Data. The flow data submitted in Attachment B of the Water Quality Assessment appears to reveal a discrepancy in the flows entering the Unnamed Tributary to Bog Run. The samples taken for the development of Anti Degradation limits show the following:
 - a. Flows upstream of the clarifying pond appear to be stormwater driven with little apparent flow contributing to the flows recorded at NPDES Outfall 001.
 - b. The flow from the clarifying pond which originates from the quarry pit and flows by gravity appears to average approximately 0.06 MGD (0.093 cfs) in the absence of pumping from the quarry.
 - c. The stormwater flow from Sediment Basin 1 appears to average approximately 0.02 MGD (0.031 cfs).
 - d. The stormwater flow from Sediment Basin 2 is indicated appears to average 0.0 MGD (0.0 cfs) as it appears to infiltrate.
 - e. The sampling data shows that flow discharging from the Rock Hill quarry and permit through Outfall 001 appears to average 0.33 MGD (0.51 cfs) in the absence of any quarry pit dewatering or operational permit discharges (0.238 MGD).

It appears there is flow in the Unnamed Tributary leading to Outfall 001 that is generated from some other source than the existing quarry infrastructure as the flow from the clarifying pond and sedimentation basins does not add up to the discharge quantity through Outfall 001. That flow appears to be:

$0.33 \text{ MGD} - (0.06 \text{ MGD} + 0.02 \text{ MGD}) = 0.25 \text{ MGD}$ flow leaving the quarry permit through present Outfall 001 area without the quarry pit contributing 0.238 MGD from operational permit discharges.

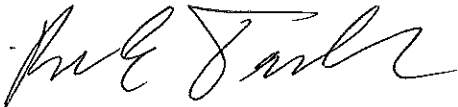
Please explain the presence of the flow of water and account for its probable source. Title 25 Pa. Code § 77.457

2. Please revise the Water Quality Assessment for the anti-degradation average monthly discharge limits for the clarifying pond at 0.238 MGD (present limit without quarry dewatering) as well as for the proposed Phase I and Phase II operations. Title 25 Pa. Code § 77.457
3. It appears that Outfall 001 must be maintained as a stormwater outfall. Please modify the NPDES application keeping Outfall 001 at its present location and redesignate the clarifying pond as a fourth NPDES outfall with the discharge limit of 0.238 MGD. Title 25 Pa. Code § 77.457
4. Please describe the treatment program that will be put in place to meet the anti-degradation average daily discharge limits. Title 25 Pa. Code § 77.457
5. Please update the following Modules to show the proposed modifications to the NPDES permit:
 - a. Module 2: Application for Individual NPDES Permit Associated with Mining Activities
 - i. Section C. Outfall Information on page 3
 1. Add the fourth Outfall at the Clarification Pond Title 25 Pa. Code § 77.128
 2. Add information for the Non-Discharging Sediment Traps and groundwater infiltration points Title 25 Pa. Code § 77.128
 - ii. Section D. Effluent Characterization
 1. Outfall 001 – Revise flow to the estimated combined discharge (Stormwater plus Non pumped Clarification Pond Discharge of 0.238 MGD)) Title 25 Pa. Code § 77.457
 2. Outfall 004 – Complete a Section D. Effluent Characterization page for the Clarification Pond Outfall 004 Title 25 Pa. Code § 77.457
 3. Question 28: Conventional and Nonconventional Pollutants: Please Check the following Nitrate-Nitrite, Oil and Grease, Phosphorous
 - iii. Please complete Section 2 of the-Anti Degradation Supplement. Title 25 Pa Code Section 93.4c.(b)(1)(i)(A).
 - iv. Map View of Area Title 25 Pa. Code § 77.454(a)(6,10)
 - v. Update the NPDES Discharge Modification Report to reflect four outfalls. Title 25 Pa. Code § 77.457
 - vi. Update the Hydraflow Hydrograph Output Report as necessary
 1. Include the 0.238 MGD flow from the Clarifying Pond. Title 25 Pa. Code § 77.457
 - b. Module 6.2: Environmental Resources Map Title 25 Pa. Code § 77.454(a)(6,10)
 - c. Module 8: Hydrology
 - i. Please update Module 8.2 Background Sampling and Monitoring to reflect the added NPDES Outfalls Title 25 Pa. Code § 77.406
 - ii. Please update Module 8.3 Groundwater Information to reflect the revised GPE and NPDES Title 25 Pa. Code § 77.405
 - iii. Please update the information in 8.4 Surface Water Information Title 25 Pa. Code § 77.406
 - d. Module 9: Operations Map Title 25 Pa. Code § 77.454(a)(6,10)

- e. Module 12: Erosion and Sedimentation Controls
 - i. Update the Module 12.2.4 narrative to reflect the limited scope of operations expressed in the January 15, 2021 response to deficiencies.
 - ii. Update the E & S Site Plan Map to reflect four Outfalls Title 25 Pa. Code § 77.454(a)(6,10)
 - iii. Update the Hydroflow Drainage Area Map – please label the features detailed in the Hydroflow Hydrograph Output Report Title 25 Pa. Code § 77.454(a)(6,10)
- 6. Please conduct and provide the results of the survey necessary for PA Fish and Boat Commission clearance for threatened sensitive species as required in the PNDI. Title 25 Pa. Code § 77.126(a)(10)

Should you have any questions regarding the identified deficiencies, please contact me to discuss your concerns or to schedule a meeting. If you believe the stated deficiencies are not significant, you have the option of declining and asking the Department to make a decision based on the information you have already made available. Please keep in mind that if you ignore this request or fail to respond to all of the deficiencies listed above by 30 days from the date listed above, your application may be denied. Also, please note that due to the application deficiencies noted above, the Permit Decision Guarantee timeframes are no longer applicable.

Sincerely,



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

cc: Tiffany M. Folk, P.G., EGM
Amiee Bollinger, SMCIS
Darren Henry, SMCIS
Earthres Group, Inc., Consultant
Tickler: 5/13/25
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MS1-RockHillQuarry (4/25)

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