



PADEP Public Hearing
Hercules Cement Company, LP d/b/a Buzzi Unicem USA, Stockertown Quarry
Upper Nazareth Township & Palmer Township, Northampton County
Verbal Testimony of Tracy Carluccio, Deputy Director
June 2, 2021

I am speaking today as Deputy Director of Delaware Riverkeeper Network and representing our over 25,000 members.

Delaware Riverkeeper Network is opposed to the deepening of the quarry. We realize that PADEP has already granted approval for the deepening, despite stating in the public announcement that the deepening is a "proposed expansion" but we understand that conditions can be added to the permit. The Hercules Cement Company received DEP approval to mine 50 more feet to Sea Level and they told DEP they will start in the eastern part of the quarry pit. We remind DEP that the obligation of the state to protect natural resources required by the PA Constitution Article 1 Section 27 is an additional layer of protection and obligation the state must act upon.

The quarry has to pump water from the pit back into the stream at the dizzying rate of 50-65 million gallons of water every day. That's 6 times the amount that all of Easton uses in a day and about twice the amount of water that all of Northampton County uses each day. How do they get away with this?

We have heard claims from Hercules and Buzzi Unicem that the groundwater they are pumping is not connected to the creek, and the Bushkill was always an intermittent stream so any discharge they put into the creek is beneficial. Both of these claims are wrong.

Regarding the intermittent stream claim: as far back as the 1974 permit from the Delaware River Basin Commission it was documented that the Bushkill was a perennial stream. As far back as 1874, the Northampton County Atlas shows the Bushkill as a perennially flowing stream. The

natural history of Bushkill Creek reveal Hercules' claims of intermittent stream to be nothing more than revisionist history so they can pump as much as they want.

Regarding the claim that their pumping and operations are not impacting creek flows: government reports show that the water being pumped is coming from the recharge zone of the Bushkill Creek and is the result of groundwater flow that connects the creek and quarry pit; that deepening the east pit would expand the flow zone, increasing the current inflow rate into the quarry; will result in additional drawdown of the water table that is shared by the creek and the quarry; and the consequences would be "extensive, significant and severe", including the likely triggering of new sinkhole formation in the area. What more does DEP need to recognize that the quarry is ruining the Bushkill? And these are just some of the impacts.

But we can't finish without calling out the horrendous and wholly avoidable fish kills caused by the quarry. The quarry has had pump failures 15 times since 2002 that have resulted in dewatering the creek, killing fish and aquatic life. In June 2020, the quarry's pump shut down for 15 hours, killing over 2,000 fish including wild brown trout. As incomprehensible as it is, when the electric pumps are knocked out, such as by a storm, the quarry has no backup generation to keep the flow going. Why? They say it's too expensive. Delaware Riverkeeper Network says that if Hercules cannot afford to operate safely and protect the creek, they should not be allowed to operate at all.

But we want to make the point tonight that it is incomprehensible that the quarry operations that result in all of this pumping occurs solely to serve the quarry's interest, without consideration of the needs of the creek and its living systems. There isn't even a minimum flow or natural flow regime requirement set by DEP that guarantees minimum and life-sustaining regime flows to protect the fish and aquatic life in this High Quality Class A Wild Trout Fishery. That means this excessive pumping and its cascade of impacts serve the private interests of a business above environmental protection. How can DEP allow that and now make the impacts worse by allowing the quarry to mine even deeper?