

February 4, 2025

Alna Planning Board

Re: Crooker Construction 2024 review/2025 Application

Dear members of the planning board,

I have reviewed Crooker's annual review documentation and 2025 blasting application and offer as public comment the following observations, questions and recommendations to be considered as the board works through the permitting process. To summarize, there continues to be sizeable growth at the quarry operation with growing concern about public safety and the impact on our community and infrastructure:

**Questions/observations/recommendations:**

1. Why are the Holes per year chart, Feet of bore hole per year chart and Explosives used per year chart missing in the 2024 review on p.33/44? These charts were included in prior year's reports (See Pg. 40/95 in 2023). Please require these charts for comparative purposes to assess year over year changes.
2. From the table on Pg. 14/44, it appears the amount of explosives used in 2024 nearly doubled from the prior year (123,080 vs. 70,648)? The table is hard to read, without definitions or explanations of columns. It appears the amount used in 2024 is 10 times that from 2019. A comprehensive review of these explosives, the reasons for larger quantities, their chemical composition and by-products may be warranted to assess public safety impacts.
3. The 2025 Proposed blasting timeframe (Page 38/44) between the hours of 9am and 4pm, Monday thru Friday does not match the hours as approved by the Alna ad hoc mining committee and Crooker Construction that are included in the draft blasting ordinance (Sec 4B(1)), and should align with those approved. Section 4B(1) of the draft blasting ordinance states that "Hours of detonation for production blasting operations shall be no earlier than 10:00 a.m. or later than 1:00 p.m. Monday through Friday inclusive."
4. Last year I commented about observations of trucks not covering their loads when leaving the quarry. Please see Exhibit 1 of a picture I took this past year. Please have the applicant describe changes or steps taken in 2024 to comply with the permit requirement to have all trucks cover their loads, and what additional steps they plan to take in 2025.

5. Is an accurate interpretation of p. 27/44 that the DEP sound level limit at K. Weeks location was exceeded six times in 2024? Is it also accurate that the DEP level was exceeded twice in 2023, (p. 34/95 of 2023 review)? If the sound levels were exceeded three times more in 2024 than in 2023 at this location, what steps does the applicant plan to take to reduce this number to zero?
6. A question about Well B-19-4 (Pg. 28/44, and pg. 32/44 and more details shown in the water quality report): Why is the depth to groundwater listed as near 0 when the applicant is not supposed to be below 2 feet of the seasonal high water mark per their original permit? This well is directly in line with Spring Brook across Bailey road. Consider reclamation requirements to comply with the 2 ft. requirement in all areas of the quarry where they are below the 2-foot minimum.
7. The SME water quality report describes a surface water sample that was taken at Spring Brook, but does not show the sample location on any map. Where on spring brook was the sample taken? Recommend having the applicant add this location clearly to the site map like all the other well/sample locations. There are also references to Spring Brook locations of samples BP-1, FB-1 and Spring Brook as listed in water quality report (pg. 12/206 for instance) without any context as to what these are, how they are different from each other or where they are.
8. The number of 20 blast days (Pg. 37/44) requested is 25% more than last year. This expansion should not be permitted.
9. The amount of 120,000 CY requested for 2025 (Pg. 37/44) represents projected 74% growth from prior year actual of 68,901 (Pg. 33/44) and should not be permitted.
10. The application (f) states that no requests were received for turbidity testing in 2024 (Pg. 38/44). Given sizeable increases in production and use of bulk explosives, etc. the Planning Board should consider if turbidity testing should be required this year.

Thank you for your thorough review of this application and for considering these inputs as you review and deliberate.



Jeff Philbrick  
Alna, ME

**Exhibit 1**



May 2024. Note bicyclist approaching uncovered truck