



GILMORE & ASSOCIATES, INC.
ENGINEERING & CONSULTING SERVICES

October 7, 2019

File No. 2012-07083

Rich Krasselt, Environmental Protection Specialist I
Bucks County Conservation District
1456 Ferry Road, Suite 704
Doylestown, PA 18901-5550

Reference: Elcon Recycling
NPDES Permit No.: PAD090044
Falls Township, Bucks County, Pennsylvania

Dear Mr. Krasselt:

Gilmore & Associates, Inc. is in receipt of your application incompleteness review letter for the above referenced project dated August 8, 2019. The plans and documents have been revised accordingly and responses have been provided below following the order of the review letter:

Items for Resubmittal or Submission of Additional Information

A. Past, present and proposed land uses and proposed alteration to project site Section 102.4(b)(5)(iii)

1. Past land uses for past 50 years addressed (*Past land uses for the past 50 years was not addressed on page 10 of the E & S Narrative. Please address upon resubmission*).

The E&S Narrative has been revised to address the land uses for the past 50 years on page 13.

2. Present land uses for last 5 years addressed (*Past land uses for the past 5 years was not addressed on page 10 of the E & S Narrative. Please address upon resubmission*).

The E&S Narrative has been revised to address the land uses for the past 5 years on page 13.

B. Types, depth, slope, locations and limitations of the soils and geologic formations Section 102.8(f)(2)

1. Site characterization of soil and geology, including appropriate infiltration and geologic studies that identify location, depths and methodology (*Infiltration testing is typically required for all NPDES Permits under §102.8(f)(2). NPDES Permit submissions located in US Steel are required to be submitted as "Individual NPDES Permits" due to possible soil contamination. Soil sample locations and the concentrations of the regulated substances need to be included on the E&S and PCSM Plan drawings.*

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For the larger site of US Steel, the environmental due diligence was previously performed by US Steel as part of their Act 2 work. The applicant will still need to provide this information on the plan drawings and NOI as part of their NPDES Construction Permit application. If the proposed use at this particular site presents a challenge for infiltration, the applicants environmental consultant will need to state as part of the PCSM report that they do not recommend the infiltration of stormwater runoff at this location due to the reason they are claiming (e.g. the proposed use at this site may adversely impact the onsite soils and/or groundwater). They will need to discuss the proposed use and explain in detail why this may cause this result. The PCSM report needs to be amended to include that they are not performing any infiltration testing for this project due to this reason and/or reasons. All applicable Act 2 information including in depth explanation of the contamination (if any) present at the site needs to be included in both the E & S design and PCSM narrative. Please refer to Chapter 17 of the Erosion and Sediment Control Manual for guidance including proper E&S Controls).

This NPDES Permit submission is being submitted as a “NPDES Individual Permit”. E&S Plan Sheet 5 and PCSM Plan Sheet 1 have been included to show the soil sample locations and notes are included on those plans to indicate that measured concentrations of regulated substances were all below the applicable Medium-Specific Concentrations. In total, 17 sample locations were evaluated in 1998 and 31 sample locations were evaluated in 2014. These samples were analyzed by TestAmerica for select volatile organic compounds (VOCs), select semi-VOCs (SVOCs), Total Petroleum Hydrocarbons (TPH), priority pollutant (PP) metals, Target Compound List (TCL) VOCs, TCL SVOCs, and polychlorinated biphenyl (PCBs). Ultimately, all of the soil samples tested were below the Medium-Specific Concentrations (MSC) for non-residential direct-contact uses; all of the soil samples were below the MSC for soil to groundwater numerical values for non-residential, non-use qualifiers; all of the soil samples were below the USEPA-PA Defaults Nonresidential Volatilization to Indoor Air numerical values; and all of the surface water samples were below the Chapter 93.8c, Table 5, Water Quality Criteria for Toxic Substances (Fish and Aquatic Life Criteria and Human Health Criteria). The actual analytical values for each sample can be found in Tables 4.1 through 4.5 in the full Act 2 Final Report for 32-Acre Parcel included with this resubmission. Since the Act 2 Final Report is 319 pages, Appendix 5.2 to the E&S Narrative and Appendix 9.4 to the PCSM Narrative include the relevant and significant parts of the Act 2 Final Report, but they do not include the Appendices to the Act 2 Final Report in an effort to conserve paper.

The reasons that infiltration is not being proposed and infiltration testing is not being performed at this site are discussed on page 7 of the E&S Narrative and pages 6-7 of the PCSM Narrative. A letter prepared by the Applicant’s environmental consultant discusses the reasons in more detail, and has been included as Appendix 5.1 to the E&S Narrative and Appendix 9.1 to the PCSM Narrative.

- C. Characteristics of the project site, including the past, present and proposed land uses and the proposed alteration to the project site Section 102.8(f)(3).
1. Permit boundaries (*The NPDES Permit boundary could not be seen in its entirety on sheet 1 of the PCSM Plan drawings. Please include an additional sheet with the miss missing information upon resubmission*).

E&S Plan Sheet 5 and PCSM Plan Sheet 1 have been included to show the entire property and the full extents of the proposed NPDES Permit boundary.

D. Receiving surface waters Section 102.8(f)(5)

1. Wetland boundaries consistent with delineation report (*A wetland delineation report was not included with the submission. Please include a wetland delineation report that is consistent with the boundaries identified on the plan drawings upon resubmission*).

A wetland delineation report that is consistent with the boundaries identified on the plan drawings has been included as Appendix 9.2 to the PCSM Narrative.

E. Construction Sequence

1. *Step #11, "construction of the buildings may begin", may not take place until after utilities, storm piping, curbs and stone base have been implemented to provide a stabilized surface to work off of and prevent accelerated erosion. Please address upon resubmission.*

E&S Plan Sheet 8, PCSM Plan Sheet 4, and the E&S and PCSM Narratives have been revised to note that construction of the buildings may not begin until after the utilities, storm piping, curbs and stone base have been constructed in order to provide a stabilized surface to work off of and prevent accelerated erosion.

If you have any questions regarding the information above or the application submitted, please contact this office.

Sincerely,



Erik Garton, P.E.
Vice President
Gilmore & Associates, Inc.

JEG/bms/sl

Enclosures: Referenced Documents

cc: Zvi Elgat, Elcon Recycling Services, LLC
Bucks County Planning Commission