



**GILMORE & ASSOCIATES, INC.**  
ENGINEERING & CONSULTING SERVICES

February 7, 2020

File No. 2012-07083

Richard Krasselt  
Bucks County Conservation District  
1456 Ferry Road, Suite 704  
Doylestown, PA 18901

Reference: Response to Additional Technical Comments from PA DEP  
Project Name: Elcon Recycling  
NPDES Construction Permit Application No. PAD090044  
Falls Township, Bucks County, PA

Dear Mr. Krasselt:

Gilmore & Associates, Inc. received additional technical comments from the PA DEP for the above referenced project on January 29, 2020. PA DEP's comments only apply to the PCSM Plans, so only the PCSM Plans and documents have been revised accordingly. The revisions have been clouded, and responses to PA DEP's comments have been provided below following the order of the review letter. Since there have been no changes to the E&S Plans since the last submission on January 17, 2020, we have included three (3) copies of only the revised documents, with changes clouded, for your records. We have also submitted two (2) copies of the revised documents to PA DEP's office in Norristown. In accordance with BCCD regulations, there is no application or fee required when no changes have been made to the E&S Plans.

### **Technical Deficiencies**

1. Previous comment has been addressed.
2. Previous comment has been addressed.
3. Previous Comment: For the MRC BMP, please indicate within the Post Construction Stormwater Management (PCSM) narrative how each of the 13 MRC Design Standards are being addressed. Where appropriate, please reference the page numbers where any application calculations/demonstrations can be found. [Section 102.8(g)(2)]

**New Comment:** Please address the following remaining deficiencies related to the previous comment:

- a. To show compliance with MRC Design Standard No. 2, please provide the calculation which results in the equivalent impervious area value of 6.54 ac.

**Response:** The calculation which results in the equivalent impervious area value of 6.54 ac. is included in Section 8.5 of the revised Post-Construction Stormwater Management (PCSM) Narrative. The total volume of 1.2-inch/2-hour storm inflow is 23,742 cf (from Hydraflow Hydrograph computations), and  $23,742 \text{ cf} \div (0.0833 \text{ ft} \times 43,560 \text{ sf/ac}) = 6.54 \text{ ac}$ .

- b. To show compliance with MRC Design Standard No. 6, please indicate on the plan drawings that at least 75 percent of the surface of the MRC BMP will be vegetated. [Section 102.8(g)(2)]

**Response: A note indicating that at least 75 percent of the surface of the MRC BMP will be vegetated has been added to Overall PCSM Plan (Sheet 1) and PCSM Plan (Sheet 2).**

4. Previous comment has been addressed.
5. Previous comment has been addressed.
6. Previous comment has been addressed.
7. Previous comment has been addressed.
8. Previous comment has been addressed.
9. **New Comment:** Each PCSM Worksheet 4 (for both POIs and for the MRC basin) utilize the ground cover of “brush” (with a curve number of 65) for the existing conditions instead of meadow (which has a curve number of 71 for soil type C per TR-55). Please make any appropriate revisions to ensure compliance with Section 102.8(g)(2)(i), which states that “existing predevelopment nonforested pervious areas must be considered meadow in good condition or its equivalent...” [Section 102.8(g)(2)(i)]

**Response: The Post-Construction Stormwater Management (PCSM) Narrative computations and worksheets have been revised to reflect that existing predevelopment nonforested pervious areas are considered meadow in good condition.**

10. **New Comment:** Please add signed P.E. seals to all PCSM Plan drawings with a structural PCSM BMP. [Section 102.8(f)(9)]

**Response: Signed P.E. seals have been added to all PCSM Plan Sheets.**

### **Plan Revisions**

#### **Sheet 1 – Overall PCSM Plan:**

1. PA DEP Resubmission dated 02/07/2020 was added to the revision block.
2. One (1) note added, stating, “At least 75% of the surface of the MRC BMP will be vegetated”.
3. Signed P.E. seal added.

#### **Sheet 2 – PCSM Plan:**

1. PA DEP Resubmission dated 02/07/2020 was added to the revision block.
2. One (1) note added, stating, “At least 75% of the surface of the MRC BMP will be vegetated”.
3. Signed P.E. seal added.

#### **Sheet 3 – PCSM Details 1:**

1. PA DEP Resubmission dated 02/07/2020 was added to the revision block.
2. Signed P.E. seal added.

#### **Sheet 4 – PCSM Details 2:**

1. PA DEP Resubmission dated 02/07/2020 was added to the revision block.
2. Signed P.E. seal added.

**Document Revisions**

Application for an Individual NPDES Permit for Stormwater Discharges Associated with Construction Activities:

1. Section D.3 for POI-A:
  - a. Volume of stormwater runoff boxes 4, 6, 7, and 8 have been revised.
  - b. Peak rate analysis boxes 9, 11, 12, 14, 15, 17, 18, and 20 have been revised.
2. Section D.4 for POI-A:
  - a. Lined MRC Basin Volume Control, and Water Quality values have been revised for Volume of stormwater treated.
3. Section D.3 for POI-B:
  - a. Volume of stormwater runoff boxes 4, 6, and 8 have been revised.
  - b. Peak rate analysis boxes 9, 11, 12, 14, 15, 17, 18, and 20 have been revised.

Post-Construction Stormwater Management (PCSM) Report:

1. The Revised date has been changed to February 2020.
2. The Date on the Project Data Sheet (page 1) has been updated.
3. The values in the Peak Discharge Rate Table 5 (page 17) have been updated.
4. NPDES Worksheets 4-5 for POI-A have been updated (pages 32-33).
5. NPDES Worksheets 4-5 for POI-B have been updated (pages 38-39).
6. The Calculated Managed Volume by the proposed MRC Basin has been updated in the Stormwater BMP Information Chart 5.B (page 46).
7. The Managed Release Concept (MRC) Design Summary has been updated (page 48).
8. The description of how MRC Design Standards 1 and 4 are being addressed have been revised in Section 8.2 (page 49).
9. The BMP Storage Calculations have been updated (pages 59-61).
10. The pre-development CN Calculations for Hydrograph Reports have been updated (pages 69-71).
11. The 1-Year through 100-Year Hydrograph Reports have been updated (pages 76-148).

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