



441 Plum Creek Road  
Sunbury, PA 17801



Encina Fort Union  
1095 Evergreen Circle, Suite 510  
Woodlands TX 77380

Re:  
Technical Deficiency Letter  
Point Township Circular Manufacturing Facility  
**NPDES Permit Application No. PAC490109**  
**Point Township, Northumberland County**

To Whom it Concerns:

The Northumberland County Conservation District has reviewed the above referenced NOI and has identified the technical deficiencies listed below. The *Pennsylvania Erosion and Sediment Pollution Control Program Manual* (E&S Manual) and the *Pennsylvania Stormwater Best Management Practices Manual* (BMP Manual) include information that may aid you in responding to some of the deficiencies listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth DEP's established means of satisfying the applicable regulatory and statutory requirements.

#### Technical Deficiencies

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1. The location of the new utility lines for the proposed buildings have not been provided on the plan drawing.  
**Past, present and proposed land uses and proposed alteration to project site §102.4(b)(5)(iii)**
2. Soil boundaries are not provided on plan drawings.  
**Types, depth, slope, locations and limitations of the soils §102.4(b)(5)(ii)**
3. Proposed contours have not been provided for all grading activities on Erosion Control Plan maps.  
**Past, present and proposed land uses and proposed alteration to project site §102.4(b)(5)(iii)**
4. Proposed Stockpile Locations no provided.  
**Past, present and proposed land uses and proposed alteration to project site §102.4(b)(5)(iii)**

5. Photocopy of the drainage map has not been provided. **Volume and rate of runoff from the project site and its upstream watershed area §102.4(b)(5)(iv)**
6. Critical stages of construction, that require engineering inspection and oversight, have not been called out in the construction sequence. **Sequence of BMP installation and removal §102.4(b)(5)(vii)**
7. Instructions to avoid compaction in areas where infiltration BMPs are going to be installed were not provided. **Sequence of BMP installation and removal §102.4(b)(5)(vii)**
8. 70% vegetative cover/ final stabilization is required to be achieved and inspected by the Northumberland County conservation district before stormwater BMPs are installed. This was not provided in the sequence of construction. **Sequence of BMP installation and removal §102.4(b)(5)(vii)**
9. Call to field mark aquatic resources within the jobsite has not been provided in the construction sequence. **Sequence of BMP installation and removal §102.4(b)(5)(vii)**
10. Wetland areas within the LOD are called to be Cleared, grubbed, and stripped on PTCMB-1901-CV-2101-1. The appropriate chapter 105 permits have not been applied for this activity. **Past, present and proposed land uses and proposed alteration to project site §102.4(b)(5)(iii)**
11. Sequence of construction note stating that disturbed subareas are stabilized upon reaching final grade is not provided in the construction sequence. **Sequence of BMP installation and removal §102.4(b)(5)(vii)**
12. ABACT Rock Construction Entrance details have not been provided. **Supporting calculations and measurements §102.4(b)(5)(viii)**
13. Broad Based Dips on access roads were not provided. **Supporting calculations and measurements §102.4(b)(5)(viii)**
14. Turnarounds for the temporary access road was not provided. **Supporting calculations and measurements §102.4(b)(5)(viii)**
15. Siltron fence has been proposed to be placed perpendicular to the contours of the land. (Perimeter BMPs that are placed parallel to the slope of the hill channelize water and blow out the angles of the fence.)  
**E&S Plan Planning & Design §102.4(b)(4)**
16. Silt Fence provided upslope of the proposed earth disturbance. **E&S Plan Planning & Design §102.4(b)(4)**
17. "Stacking" perimeter BMPs is proposed on plan drawings. **(Slope length should not be addressed by use of multiple rows of compost socks)**. (Compost filter sock has been proposed to be placed up slope of the Siltron Fence)

**E&S Plan Planning & Design §102.4(b)(4)**

18. 8 inch silt sock was provided on plan drawings. (8 inch silt sock is not considered an ABACT BMP)

**E&S Plan Planning & Design §102.4(b)(4)**

19. Numbered Silt Fence Sections not provided on project drawings.

**E&S Plan Planning & Design §102.4(b)(4)**

20. Inadequate table used for Siltron Fence sizing.

From the E&S and PCSM Alternative BMPS Document:

*The 16-in. filter fence will use slope lengths equivalent to an 18-in. compost filter sock; the 21-in. filter fence will use slope lengths equivalent to a 24-in. compost filter sock; the 28- in. filter fence will use slope lengths equivalent to a 32- in. compost filter sock.*

Please provide sizing chart that refers to FIGURE 4.2 “max permissible slope length above compost filter socks”

**Supporting calculations and measurements §102.4(b)(5)(viii)**

21. Size of the Siltron Fence that each section will utilize was not provided on the plan drawings.

**Supporting calculations and measurements §102.4(b)(5)(viii)**

22. The ends of the proposed parameter BMPs have not been angled upslope.

**Plan drawings §102.4(b)(5)(ix)**

23. Proposed contours/grades for all channels/berms have not been provided.

**Past, present and proposed land uses and proposed alteration to project site §102.4(b)(5)(iii)**

24. How channels are navigating through different elevation changes and wetlands have not been provided.

**Past, present and proposed land uses and proposed alteration to project site §102.4(b)(5)(iii)**

25. The Utility Line that is placed along the existing access road on site has not been provided on site plans.

**Past, present and proposed land uses and proposed alteration to project site §102.4(b)(5)(iii)**

26. Temporary erosion control blanket for all channels with a drainage area greater than 1 acre have not been provided.

**Past, present, and proposed land uses and proposed alteration to project site §102.4(b)(5)(iii)**

27. Detail 6-3 not provided for rip rap lined channels.

**Supporting calculations and measurements §102.4(b)(5)(viii)**

28. Worksheet 11s have not been provided for the temporary stage of the permanent channels SG2-SW005-001 through 7 and SG2-SW006-001.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
29. Worksheet 11 not provided for sediment basin emergency spillways.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
30.  $Q \geq Q_r$  (worksheet 11) is not provided for channels SG1-SW001-01, SG1-SW001-04, SG1-SW002-01, SG1-SW003-01, SG1-SW003-03, SG1-SW003-04, SG2-SW005-04, SG2-SW005-06, SG2-SW006-001  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
31. MAX ALLOWABLE SHEAR STRESS not provided on worksheet 11s.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
32. Agricultural Lime specified at 6 T/acre or as per soil test, not provided for permanent stabilization on page ECMF-PRMT-CV-2001-3.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
33. 10-20-20 Fertilizer specified at ½ ton/acre or as per soil test, not provided for permanent stabilization. on page ECMF-PRMT-CV-2001-3.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
34. Erosion and Sediment control blanketing not provided as an anchoring method for (permanently- steep slope) on page ECMF-PRMT-CV-2001-3.  
Comment: all critical areas, slopes over 4:1, and areas of concentrated flow are required to have Erosion and sediment control blanketing placed.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
35. Stabilization of non-graded, but unstabilized areas within the project site boundaries have not been addressed.  
**Sequence of BMP installation and removal §102.4(b)(5)(vii)**
36. Dewatering time of 4-7 days (ABACT Requirement) not provided for basin 1 on worksheet 12.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
37. A skimmer system, or 18 inch permanent pool is not provided for each erosion and sediment control basin to satisfy ABACT requirement.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
38. 4:1 or greater flow length to basin width ratio, to meet ABACT requirements, has not been provided for each basin. (Indication of baffling being utilized was not provided.)  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
39. A principal Spillway Capacity lesser of the Riser and Barrel capacity has not been provided for all erosion and sediment control basins on site.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**

40. Interior and Exterior contours provided on each basin have not been provided on the plan drawings.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
41. Sediment removal stake locations and elevations have not been provided on plan drawings.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
42. On detail 7-6 temporary basins Z1 + Z2 length are not  $\geq 5$ . This is required for all temporary stages of basins.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
43. On detail 7-7, the riser diameter provided does not match the riser diameter on WS#13 for all 3 basins.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
44. Anti-seep collar detail not provided on plan drawings.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
45. Outlet Barrel in Concrete Bed detail not provided on plan drawings.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
46. Filter Diaphragm detail not provided.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**
47. Clean out stake detail not provided.  
**Supporting calculations and measurements §102.4(b)(5)(viii)**

Comments:

1. Have the NPDES Permits/ and mining Permits been Terminated? If not, have coordination been made with the issuing entity for permit transfer?
2. Has fill being placed within the 100-year floodway been permitted with the North Central Regional office of DEP?
3. Please explain the term Straight Light Disc/ Crimper (as stated under "Anchoring Method" on page ECMF-PRMT-CV-2001-3)
4. With wetlands in the area, how was it determined that the erosion and sediment control basins are above the season high water table?
5. What are the plans for Erosion Control Basin 3? Will it eventually be converted to a PCSM BMP?

You must submit a response fully addressing each of the technical deficiencies set forth above. Please note that this information must be received within 30 calendar days from the date of this letter, on or before March 8<sup>th</sup>, 2023 or the District may deny the NOI. Alternatively, you may consider a voluntary withdrawal.

Please submit a copy of the revised information to the District at 441 Plum Creek Rd, Sunbury PA 17801 or one copy if submitted electronically to ctanczos@nccdpa.org.

**Please be advised that if your response does not satisfy the technical deficiencies, in general your NOI or application will proceed to an Elevated Review. If you do not believe the technical deficiencies can be fully addressed within the required timeframe, you should consider a voluntary withdrawal.** If a permit application is denied, there is no recovery of fees available; however, if you voluntarily withdraw the NOI or application and then submit a new NOI or application for the same project, previously paid disturbed acreage fess will be reapplied to the new NOI or application.

If you believe that any of the stated deficiencies are not significant, instead of submitting a response to that deficiency, you have the option of requesting that the District make a permit decision based on the information you have already provided regarding the subject matter of that deficiency. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency.

If you have questions about your NOI, please contact Christopher Tanczos by e-mail at ctanczos@nccdpa.org or by telephone at 570 495 4665 x 302 and refer to Application No. PAC490109, to discuss your questions or to schedule a meeting. You must attempt to schedule any meeting within the 30 calendar days allotted for your reply.

Sincerely,

A handwritten signature in black ink, appearing to be 'Nathan Brophy', written over a light gray dotted grid background.

On behalf of Nathan Brophy  
District Manager  
Northumberland County Conservation District

cc: Augusto Ramos Orozco  
Curtis Barrick  
Point Township  
bcc: File

Enc

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2/6/2023

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