

March 14, 2023

Ms. Holly Kaplan, Assistant District Manager
Lehigh County Conservation District
Lehigh County Agricultural Center, Suite 102
4184 Dorney Park Road
Allentown, PA 18104-9583

Re: Incompleteness Letter
Core5 at Route 100 NPDES Permit Application No. PAD390269
Lowhill Township, Lehigh County
BL Project No. 2100397

Dear Ms. Kaplan,

On behalf of Core5 Industrial Partners, BL Companies is pleased to submit the *revised* Individual NPDES Permit Application package for the above referenced project.

The following items are included as part of this submission:

- One (1) copies of the *revised* PCSM Plan
- One (1) copies of the *revised* PCSM Narrative
- One (1) copies of the *revised* E&S Plan
- One (1) copies of the *revised* E&S Narrative
- One (1) copies of the *revised* Individual Permit NOI
- One (1) copies of the *revised* General Information Form
- One (1) copies of the *revised* Module 1
- One (1) copies of the *revised* Module 2
- One (1) copies of the *revised* Module 3
- One (1) copies of the *revised* Module 4
- One (1) copies of the *revised* Pre-Application Form
- One (1) copies of the Board of Government Center ACT 14 Proof of Delivery Receipt

The following are our responses to the comments provided in the Incompleteness Letter dated February 28, 2023. Responses to the comments are listed in the order they were provided and are in ***bold and italic type***.

Items for Resubmittal or Submission of Additional Information

1. General §102.6(c)(1)

- a. Please provide the location of the wetland determination (with at least one data sheet), it could not be located in the application package.

Response: The wetland determination report is located in Appendix H of the PCSM report.

- b. Please provide a Water Supplier Approval Letter upon receipt.

Response: Approval letter will be provided to LCCD upon receipt.

- c. Please provide Act 537 Approval upon receipt.

Response: Acknowledged, Sewage Module approval will be provided once obtained from the sewage authority.

- d. Please ensure that a copy of the Act 14 Land Use Notification form is sent to the County Board of Government Center (17 S 7th Street Allentown, PA 18101), and the certified mail receipt is provided. In the past, notifications were sent just to the municipality and LVPC, but separate county notification is now needed.

Response: Act 14 Land Use Notification form has been sent to the County Board of Government Center on March 6th, 2023. See FedEx Proof of delivery attached.

- e. Application, page #4: Please note that the name of receiving waters should include the feature by which stormwater exits the project site. For example, if at DP 001 water is conveyed offsite through an existing swale, the name of receiving waters would be "Cherith Brook via existing swale". The name of receiving watercourse should remain consistent across all plans, documents, and modules.

Response: All plans, documents, and modules have been updated to say "Cherith Brook via existing swale". See Pre-Application Form attached.

- f. Application, page: The receiving watercourse identified here is not consistent with the receiving watercourse identified on the PCSM Spreadsheet, please provide consistency across all plans, modules, and documents.

Response: The receiving watercourse has been updated to say "Cherith Brook via existing swale" on the PCSM Spreadsheet to match all plans, modules, and documents. See Appendix B of PCSM Narrative.

- g. GIF, page 1, Client Information: Please provide the Employer ID# (EIN) in the space provided. In cases of an individual applicant, an SSN may be used.

Response: Employer ID# (EIN) has been added to GIF, page 1, Client Information.

- h. GIF, page 4, #4.0.1: Please provide earth disturbance area consistent with that identified in the Application.

Response: Earth disturbance area was updated to 14.79 acres on GIF, page 4, #4.0.1.

E&S

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

- a. Module 1, page 1: Please provide consistency with the updated Name of Receiving Waters from page 4 of the Application.

Response: Name of Receiving Waters have been updated to “Cherith Brook via swale” on documents.

- b. Module 1, page 1, #1: Please also provide a brief description of the site’s general drainage pattern.

Response: Drainage pattern of the site has been added to Module 1, page 1, #1.

- c. Module 1, page 1, #2: Please also provide the E&S plan sheet where the soil limitations and resolutions can be found.

Response: Plan location regarding soil limitations have been added to Module 1, page 1, #2.

- d. Module 1, page 3, #5: Please uncheck the box for the rock construction entrance, as the RCE with wash rack below is sufficient.

Response: Rock Construction Entrance box has been unchecked on Module 1, page 3, #5.

- e. Module 1, page 3, #5: Please check the “Waste Management” box and identify the E&S plan sheet where the project waste recycling/disposal notes can be found in the “Plan No(s). Identified” column. “N/A” should be placed in the remaining column.

Response: Waste Management box and identification column has been checked and updated on Module 1, page 3, #5.

- f. Module 1, page 3, #5: Please note that for “as-needed” BMPs such as the proposed rock filter outlet “N/A” should be placed in the “Plan No(s). Identified” column, as a symbol does not appear on the E&S plan-view.

Response: Proposed rock filter outlet and pumped water filter bag BMPs have been updated to say “N/A” for Plan No. Identification on Module 1, page 3, #5.

- g. Module 1, page 7, #16: Please also identify the E&S plan sheet where the project hwywaste/recycling notes can be found.

Response: Plan location regarding waste and recycling note has been added to Module 1, page 7, #16.

3. Supporting calculations and measurements §102.4(b)(5)(viii)

- a. Please provide the location of standard worksheet #8 for rock filters, one could not be located in the provided E&S Narrative.

Response: Standard worksheet #8 for rock filters has been added to Appendix B of the E&S Narrative.

- b. Please provide the location of standard worksheet #20 for riprap aprons, one could not be located in the provided E&S Narrative.

Response: Standard worksheet #20 for riprap aprons has been added to Appendix B of the E&S Narrative.

- c. Please provide a standard worksheet #11 for the proposed swale if it receives 1 acre of drainage or more.

Response: Worksheet #11 has been added to Appendix B of the E&S Narrative.

- d. Please provide the location of the design sheet for the proposed structural level spreader, one could not be found in the provided E&S Narrative.

Response: Design sheet for the proposed level spreader has been added to Appendix B of the E&S Narrative.

4. Plan drawings §102.4(b)(5)(ix)

- a. E&S Plan Drawings: Please provide additional existing contour labels throughout the project site for clarification.

Response: Additional existing contour labels have been added throughout the project site. See Sheets 4 and 5, EC-1 and EC-2.

- b. E&S Plan Drawings: Please more clearly identify the location of the compost sock sediment trap, it could not be located on the E&S plan-view, and a detail could not be found. If one is no longer proposed, please uncheck the box indicating a compost filter sock sediment trap will be used on page 3 of Module 1.

Response: Compost sock sediment trap is no longer proposed. Compost sock sediment trap has been unchecked on page 3 of Module 1.

- c. E&S Plan Drawings, sheets EC-1 and EC-2: Please label/identify each run of compost filter socks consistent with numbering identified on standard worksheet #1 for compost filter socks for reference purposes.

Response: E&S Plans have been revised to correct inconsistencies.

- d. E&S Plan Drawings, sheets EC-1 and EC-2: Please label/identify the invert elevation of any existing or proposed inlets onsite.

Response: Existing and proposed inlets have been labeled with invert elevations on Sheets 5, EC-2.

- e. E&S Plan Drawings, sheet DN-2: Please provide a staple pattern detail to accompany the provided erosion control matting detail.

Response: Staple Pattern Detail has been added to Sheet 7, DN-2.

- f. E&S Plan Drawings, sheet DN-2: Please provide the table from standard worksheet #1 for compost filter socks to accompany the provided detail.

Response: Table from worksheet #1 has been added to Sheet 7, DN2.

- g. E&S Plan Drawings: Please provide the location of clean fill and due diligence notes consistent with those found on DEP's E&S Resources webpage, they could not be located on the plan drawings.

Response: Notes regarding clean fill and due diligence can be found on Sheet 6, DN-1.

- h. E&S Plan Drawings: Please provide the location of project waste recycling/disposal notes consistent with those found on DEP's E&S Resources webpage, they could not be located on the plan drawings.

Response: Notes regarding waste recycling/disposal can be found on Sheet 6, DN-1.

- i. E&S Plan Drawings: Please provide the location of the maximum during construction drainage area map. If the during construction drainage areas to BMPs shown on the plan-view are maximum during construction, please provide a note stating this.

Response: Note indicating the maximum drainage area value on plan can be found on Sheet 4, EC-1, Note #6. consistent with those found on DEP

- j. E&S Plan Drawings: Please identify the receiving watercourse's floodway on the E&S plan-view and provide a line in the E&S legend identifying it as such.

Response: Floodway has been labeled on Sheets 4 and 5, EC-1 and EC-2.

5. Antidegradation Analysis

- a. Module 3, page 1, Surface Water Name: Please provide consistency with the updated Name of Receiving Waters from page 4 of the Application.

Response: Name of Receiving Waters has been updated to say "Cherith Brook via swale" on Module 3, page 1.

PCSM

6. General PCSM planning and design 102.8 (b)

- a. Module 2, pages 1, 3, 5, Surface Water Name: Please provide consistency with the updated Name of Receiving Waters from page 4 of the Application.

Response: Name of Receiving Waters has been updated to say "Cherith Brook via swale" on Module 3, page 1.

- b. Module 2, page 1, #2: Please remove any references to E&S plans/BMPs as this module refers to PCSM conditions only.

Response: References to E&S plans have been replaces with references to PCSM plans on Module 2, page 1, #2.

- c. Module 2, page 5, #4: Please note that if the box indicating a copy of the PCSM Spreadsheet is checked, #'s 5-9 (including checked boxes) should not be provided as they will not be reviewed in addition to the spreadsheet.

Response: All information within #'s 5-9 on page 5 of Module 2 has been removed.

- d. Module 2, page 6, Long-Term O&M: Please also provide the BMP ID#s assigned on page 1 in the spaces provided.

Response: BMP ID#'s have been provided on page 6 of Module 2.

7. Supporting calculations §102.8(f)(8)

- a. Please provide the location of standard worksheet #20 for riprap aprons, one could not be located in the provided PCSM Narrative.

Response: Standard worksheet #20 for riprap aprons has been added to Appendix J of the PCSM Narrative.

- b. Please provide a standard worksheet #11 for the proposed swale if it receives 1 acre of drainage or more.

Response: Worksheet #11 has been added to Appendix E of the PCSM Narrative.

- c. Please provide the location of the design sheet for the proposed structural level spreader, one could not be found in the provided PCSM Narrative.

Response: Proposed structural level spreader design is located in Appendix J of the PCSM Narrative.

8. Plan drawings §102.8(f)(9)

- a. PCSM Plan Drawings, sheets PCSM-1 and PCSM-2: Please provide flow arrows on all pipe runs.

Response: Flow arrows have been provided on all pipe runs. Refer to Sheet 5, PCSM-2.

- b. PCSM Plan Drawings: Please provide the name and contact information for the responsible party, with a note stating that they will be responsible for the long-term O&M of PCSM BMPs.

Response: The permittee is the responsible party of the long-term O&M of PCSM BMPs, refer to Sheet 1 of the PCSM Plan. Permittee of this project is the applicant, Brian Reisinger of Core5 Industrial Partners.

- c. PCSM Plan Drawings: Please provide additional existing contour labels throughout the project site for clarification

Response: Additional existing contour labels have been added throughout the project site. See Sheets 4 and 5, PCSM-1 and PCSM-2.

- d. PCSM Plan Drawings: Please identify the receiving watercourse's floodway on the PCSM plan-view and provide a line in the PCSM legend identifying it as such.

Response: Floodway has been labeled on Sheets 4 and 5, PCSM-1 and PCSM-2.

- e. PCSM Plan Drawings: Please ensure that the post-construction drainage area map is included with the PCSM plan drawings so that it will be recorded.

Response: Post Development Drainage Map has been added to the PCSM Plan. See Sheet 6, DA-2.

- f. Please ensure that final grade verification appears as a critical stage of PCSM construction.

Response: Preliminary grade check has been added to Step 10 of the sequence of construction. Final grade verification as a critical stage has been added to the sequence of construction. See Sheet 5, PCSM-2, Note #11 and #16.

9. Riparian forest buffer management plan §102.8(f)(14)

- a. Module 4, Surface Water Name: Please provide consistency with the updated Name of Receiving Waters from page 4 of the Application.

Response: Name of Surface Water Name has been updated to say "Cherith Brook via swale" on Module 4, page 1.

Should you have questions or require additional information, please do not hesitate to contact me at 717-943-1667 or gholtzman@blcompanies.com.

Sincerely,
BL Companies



Greg Holtzman
Project Manager

cc: Brian Reisinger, Core5 Industrial Partners