

June 3, 2026

Jay Russell
District Manager
24 Avalon Court, Suite 300
Mercer, PA 16137

Dear Mr. Russell:

Subject: Incompleteness Letter
Mercer Node Development
NPDES Individual Permit Application No. PAD430004
City of Sharon, Mercer County
CEC Project 353-024

Civil & Environmental Consultants, Inc. (CEC) is in receipt of the Incompleteness Letter Mercer Node Development – NPDES Individual Permit Application No. PAD430004 dated May 4th, 2026.

Regarding the comments, CEC presents the below responses:

Items for Resubmittal or Submission of Additional Information

1. §102.6(a)(1)
Please submit proof of coordination with PHMC. (Refer to General Information Form, page 7, coordination information).

RESPONSE: Consultation was initiated with the PHMC on May 5, 2026. The submission documents and proof of submission have been included as part of this resubmission package. Their initial response was received on May 20th requesting additional information for the above ground resources. Additional surveys and memo documents are being performed concurrently with this resubmission to provide the additional information requested. The clearance letter to be provided once received.

2. §102.6(a)(1)
Application page 1, please provide NAICS code.

RESPONSE: The NAICS code has been added to page 1 of the NPDES application.

3. §102.6(a)(1)
Application page 4, please complete the compliance history section.

RESPONSE: The compliance history section box on page 4 of the NPDES application has been completed.

4. §102.6(a)(1)

Application page 4, item #20 indicates the project site is currently or was previously enrolled in DEP's Act 2 program, item #21 indicates that Act 2 cleanup standards have not been met. Please provide Act 2 release of liability letter.

RESPONSE: The 2015 EC includes the documentation that satisfies the previous Act 2 standards, which were met and that the site received a release of liability but came with Activity Use Limits (AUL). The new COA allows for characterization of the site to a greater extent for additional uses beyond what the Activity use limits had permitted under the 2015 EC, and start a new Act 2 with additional characterization to permit new uses for the site. A Notice of an Intent to Remediate to an Environmental Standard was submitted to the PA DEP on May 18, 2026. See additional documents of the public notice submitted to the Sharon Herald and the Epermitting Submission details for the Notice of Intent to Remediate.

5. §102.6(a)(1)

Application page 4, please answer item #26.

RESPONSE: Item #26 on page 4 of the NPDES application has been completed.

6. §102.6(a)(1) and §102.4(b)(5)(ii)

Application page 5 item #3, please check yes that ABACT BMPs/SCMs will be used to manage stormwater discharges during and following construction. ABACT BMPs/SCMs are required for this project due to contaminated soils at the project site.

RESPONSE: Item #3 on page 5 of the NPDES application has been revised to yes. All storm water BMPs have been revised to meet ABACT requirements. Module 3 has been completed and is included within the PCSM documents section of the resubmission package.

7. §102.6(a)(1)

Application page 5 item #4, please check yes or no.

RESPONSE: Item #4 on page 5 of the NPDES application has been completed.

8. §102.6(a)(1)

Application page 5 item #4 indicates there will not be an increase in volume to the sewer system, the notifications of proposed stormwater discharges to MS4s and CSSs for Ch 102 permits form indicates an increase in volume to the sewer system. Please verify that Discharge Point 002 is the correct discharge point on the notifications of proposed stormwater discharges to MS4s and CSSs for Ch 102 permits form. Please revise or clarify accordingly.

RESPONSE: The project development site's landcover in the pre-construction conditions is 100% impervious and in the post-construction is 100% impervious, therefore; in a pre-/post- comparison there is not a net increase in volume to the stormwater discharge points. Additionally, the increase in volume when modeled as 20% of the existing impervious as meadow in good condition is controlled by the proposed underground detention systems with managed release control. The underground detention systems have been designed per the PA DEP white paper including pre-treatment of the stormwater. The notification of proposed stormwater discharge to MS4s and CSSs for the Chapter 102 Permit Application have been revised to indicate that.

9. §102.6(a)(1)
General Information Form page 6, please answer item #4.

RESPONSE: Item #4 on page 6 of the General Information Form has been completed.

10. §102.6(a)(1)
General Information Form page 10, item #16.0.2 indicates that a water supply letter of approval is attached to the application. Aqua connection response letter, connection requirements, paragraph 1 states that the letter is not an approval of the connection. Please provide a water supply letter of approval.

RESPONSE: Item #16.0.2 has been revised to check no that a Letter of Approval from supplier is attached. A will serve letter from the supplier (Aqua) has been received and final approval letter for connection will be included upon receipt as needed.

11. §102.6(a)(1)
General Information Form page 11, item #20.0 is checked "No". Since the proposed project site has known contaminated soils, please revise or clarify.

RESPONSE: Item #20 on page 11 of the General Information Form has been revised to yes.

12. §102.4(c)
Submit Erosion Potential (EP) analysis forms for each discharge point expected to receive concentrated flows during and following construction. (Refer to NPDES Individual Permit Application Instructions page 9).

RESPONSE: Erosion Potential (EP) analysis forms have been provided for each of the discharge points expected to receive concentrated flow. An EP analysis has not been provided for DP-001 or DP-004 since this discharge analysis point will only receive sheet flow. Please refer to the provided EP Analysis forms for DP-002 and DP-003.

13. §102.6(a)(1), §102.4(b)(5)(ix) and §102.8(f)(9)
Vegetative Stabilization and associated BMPs: it is stated on page 3 of the post- construction stormwater management summary that any planting is prohibited due to the impervious cap per the COA. Please remove vegetative stabilization and erosion control blanket BMP use proposals from the application. Please refer to construction sequence item #16, BMP maintenance notes #2 & #6, Phase II & III C904 item E and Module 1 page 5 items #12 & #13.

RESPONSE: The vegetative stabilization and erosion control blanket BMP have been removed from the NPDES application. Construction sequence item #16, BMP maintenance notes #2 & #6, Phase II & III C904 item E and Module 1 page 5 items #12 and #13 have been revised to remove vegetative stabilization and erosion control blanket BMPs.

14. §102.6(a)(1)
Module 1 page 5, please uncheck item #16.

RESPONSE: Item #16 in Module 1 has been revised.

15. §102.6(a)(1), §102.4(b)(5)(ii) and §102.4(b)(5)(ix)

Module 1 page 5, item #17 indicates that construction dewatering is expected for this project. If this project is proposing to use pumped water filter bags, please indicate on Module 1 page 3 and provide BMP detail in ESPC drawings. Please ensure that ABACT requirements are met as well as consistency with guidance provided in site specific PCSM plan, environmental covenant and COA.

RESPONSE: Module 1 page and 5 and the Temporary Control Measures Section F. were revised to indicate that all dewatering activities must be completed under the observation of the designated environmental representative and completed under the guidance of the COA, Environmental Covenant, and Materials Management Plan.

16. §102.6(a)(1) and §102.4(b)(5)(ii)

Module 1 page 5, please provide information for item #18. The project site contains contaminated soils which have the potential to cause pollution during earth disturbance. This information should meet ABACT requirements as well as be consistent with guidance provided in site specific PCSM plan, environmental covenant and COA.

RESPONSE: Module 1 page 5 #18 was revised to state the ABACT requirements for all site BMPs and consistency with the requirements outlined in the site's COA, Environmental Covenant, and site-specific Materials Management Plan.

The E&S and PCSM details have been revised as needed to reference consistency with the site's COA, Environmental Covenant, and site-specific Materials Management Plan.

17. §102.6(a)(1), §102.4(b)(5)(ii) and §102.4(b)(5)(ix)

Rock construction entrances on ESCP drawings for Phases I, II & III do not meet ABACT requirements. Please revise.

RESPONSE: The rock construction entrances in the ESCP drawings on pages C901 & C902 have been revised to meet ABACT requirements.

18. §102.4(b)(5)(ix)

ESCP drawings show use of concrete washout stations. Please revise Module 1 page 3.

RESPONSE: Module 1 page 3 has been revised to show use of concrete washout stations.

19. §102.4(b)(5)(ii)

Please submit a map showing the current extent of on-site soil contamination. Environmental Covenant, Attachment B, Exhibit C-2 is dated 07/24/2009.

RESPONSE: An environmental investigation is ongoing, and additional details will be provided following the review and analysis of updated samples. An additional exhibit has been provided that depicts the extent of the on-site soil contamination from the Environmental Covenant Attachment B, Exhibit C-2 dated 7/24/2009 in relationship to the proposed development site plan.

20. §102.4(b)(5)(ii)

Please submit a map showing the current extent of on-site groundwater contamination, including pollutant concentrations and sampling locations. Environmental Covenant, Attachment B, Exhibit C-1 is dated 04/30/2014.

RESPONSE: An environmental investigation is ongoing, and additional details will be provided following the review and analysis of updated samples. An additional exhibit has been provided that depicts the extent of the on-site ground water contamination from the Environmental Covenant Attachment B, Exhibit C-1 dated 4/30/2014 in relationship to the proposed development site plan.

21. §102.4(b)(5)(ii)

ESCP Phases I, II & III drawing temporary control measure items (A) — (I) should meet ABACT requirements as well as be consistent with guidance provided in site specific PCSM plan, environmental covenant and COA.

RESPONSE: ESCP Phases I, II, & III plans and drawings have been revised to meet ABACT requirements and to reference the guidance provided in the site-specific PCSM plan, environmental covenant, COA, and materials management plan.

22. §102.6(a)(1)

ESCP drawing BMP maintenance notes should state that inspections must be performed by a Qualified Visual Site Inspector or someone who is either a Certified Professional Erosion and Sediment Control (CPESC) or Certified Erosion, Sediment and Storm Water Inspector (CESSWI).

RESPONSE: The BMP maintenance notes on C904 have been revised to include the above statement.

23. §102.4(b)(5)(ii)

ESCP Phase I, II & III drawings: Recommend including statement providing direction for site contractors and other appropriate parties to reference on-site PCSM plan for site-specific guidance, procedures, and responsibilities.

RESPONSE: The ESPC Phase I, II, & III drawings have been revised to include the above note.

24. §102.4(b)(5)(iii); §102.8(f)(3)

Please provide specifications for retaining wall to be built on the west side of phase II and III on ESCP and PCSM plans.

RESPONSE: The specific retaining wall type and detailing will be designed following the completion of the geotechnical investigation at the site. The maximum height of the retaining wall is 5-FT and the overall height averages approximately 2-3-FT for the majority of the length of the wall. Based on the information and location of the wall we do not anticipate that the detailed design or construction of the retaining wall would impact the overall size of the limit of disturbance. Additional details will be provided following the geotechnical investigation.

25. §102.8(f)(9)

PCSM plans lack sufficient information for construction. Underground detention system refers to contractor and engineer on record approval shop drawings that indicate size, location of inlet/outlet pipe types, invert elevation and size of openings. Please provide additional specifications to the drawing to show how this system will tie into other PCSM structures

RESPONSE: The PCSM plans have been revised to include additional specifications on the drawing for the construction and connection detailing for other PCSM structures.

26. §102.8(f)(9)

PCSM Plans lack sufficient information on the connections to the existing storm sewer system, and these connections appear to be outside the LOD. Please address the connections to existing municipal storm sewer system.

RESPONSE: The limit of disturbance has been revised to include the connection to the existing municipal storm sewer system. Additional details have been provided to the PCSM Plan.

27. §102.4(b)(5)(ix) and §102.8(f)(9)

Please include plan revision date on ESCP and PCSM plans.

RESPONSE: The plan revision date has been added to the ESCP and PCSM plans.

Additional Advisory Comments

1. §102.6(a)(2)

Please provide USFWS PNDI clearance letter. Please note that permit coverage may not be approved until clearance letters are received.

RESPONSE: Noted the PNDI clearance letter has been included in the revised submission.

2. §102.6(a)(1)

Application page 4, item #22 indicates Act 537 sewage planning approval is needed for this project. Please provide Act 537 planning approval letter if available. Please note that although an NPDES Individual Permit can be approved without this letter, earth disturbance may not commence without it.

RESPONSE: Noted the waiver for the ACT 537 sewage planning approval is being coordinated with the location sanitary authority and the PA DEP. This will be provided upon receipt.

3. *General Information Form page 11, items #21.0 — 24.0 have been checked “Yes”. Please note that a Storage Tank Site Specific Installation Permit may be needed for this project.*

RESPONSE: Understood. If a storage tank site specific installation permit is required for this project, it will be coordinated with the department.

4. *General Scope of work in the project hazard assessment form and safety plan appears to focus on core boring and sampling activities. It is recommended site construction and post- construction care be included in the Site-Specific Health and Safety Plan (Section 14 of PCSM). It is recommended that ESCP and PCSM drawings provide direction for site contractors and other appropriate parties to reference H&SP in the on-site PCM plan for this information*

RESPONSE: Additional sampling activities are ongoing at the development site. The Site-Specific Health and Safety Plan will be revised following the results of the testing and developed for the construction and post-construction activities.

If you require additional information to complete the technical review, please reach out to Rachel McCune at 724-972-3781 or rmccune@cecinc.com.

Thank you,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Rachel I. McCune, P.E.
Project Manager



Michael E. Archer, P.E.
Principal

Enclosures