



5/11/2026

Joel S. Heiser  
Homer City Generation LP  
1750 Power Plan Road  
Homer City, PA, 15748

Re: Technical Deficiency Letter  
Homer City Generation Power Block  
NPDES Permit Application No. PAC320068A2  
Blacklick Township & Center Township

Dear Mr. Heiser:

The Department of Environmental Protection (DEP) and the Indiana County Conservation District has reviewed the above referenced NOI for PAG-02 application 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**

1. PCSM overview drawing 20059040-SK-100 seems to show a change in grading on Laydown Area A, but no change is shown on SK-101. Please confirm that no changes are being made to Laydown Area A or provide a revised SK-101 drawing showing any change.
2. Laydown Area N and O would appear to have perimeter swales going to features identified as "Spillway". This would constitute a point source discharge and requires stormwater analysis. Also DP/flowpath from "spillway" to receiving waters with EP analysis. Alternatively, post-construction grading to eliminate the collection swales and spillway and establish natural contour/re-establish natural drainage patterns on the site could be considered site restoration.
3. Laydown Area C would appear to have PCSM pavement. There does not appear to be any changes indicated to SCM-02 grading, outlet structure, or water surface elevations shown on the plan drawings.
  - The calculations provided are showing a reduction in flows to SCM-02.
  - CN values being revised for SCM-02 (pg260/376) as compared to previous modification, resulting in lower overall CN/runoff – explained in the narrative as being the result of increased impervious in Area C, and a reduction in impervious in Area E, however, there does not appear to be any difference on the PCSM Drawings for Area E.
  - If there is no change in the grading or outlet structure for SCM-02, why would there be a reduction in SCM storage indicated in Table 10-4?
4. Flow directions shown for SCM-04 piping appear to be incorrect on 20059040-SK-010. Collection of surface runoff and direction into the two portions of SCM-04 doesn't appear well defined.
5. Module 2 – Stormwater Analysis – 9. Thermal Impacts: the drainage area of SCM goes from 177.73 acres in Ph2 Mod to 180.8 acres in the Ph3 Mod, accounting for the area treated by SCM 04. The drainage area



of Surface Water at DP of SCM also changes from 237.28 acres in Ph2 Mod to 396.27 acres in the Ph3 Mod. Explain why the drainage area of the receiving water would change.

6. Table 6-1c does not list SCM-04, but does reflect the increase in drainage area and runoff.

7. E&S Drawings – RipRap Apron shown in the legend, but unable to find on drawings.

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 **Wednesday, June 10, 2026**, to DEP or the Indiana County Conservation District may deny or withdraw the NOI/Application. Alternatively, you may consider a voluntary withdrawal.

Your response must be submitted to the District and DEP using the same method of submission as was used for the original NOI/Application.

**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 fees 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 DEP & 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.

Conservation districts may charge additional fees in accordance with section 9(13) of the Conservation District Law (3 P.S. § 857(13)). You may be expected to submit these fees to a conservation district in accordance with Chapter 102, section 102.6(b)(3).

If you have questions about your NOI/Application please contact Marisa Matlin by e-mail at [m.matlin@iccdpa.org](mailto:m.matlin@iccdpa.org) or by telephone at 724-471-4751 x 6 and refer to Application No. PAC320068A2 to discuss your questions or to schedule a meeting. Any such meeting must be held within the deficiency correction period.

Sincerely,

*Marisa Matlin*

Marisa Matlin  
Conservation Program Specialist  
Indiana County Conservation District

cc: Timothy Hines – Kiewit  
Toby Partridge – Michael Baker  
Karl Gross – NWRO DEP Permits Chief

