February 5, 2026

Scott Williamson
Program Manager PADEP
Waterways and Wetlands Program
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110

Re: AAMPA Ritner Highway – Supplemental Information and Response to Public Comments Received

Dear Mr. Williamson:

On behalf of AAMPA Holdings, LLC ("AAMPA"), this letter addresses public comments that have been received to date related to AAMPA's proposed warehouse development project located at 3485 Ritner Highway, Newville, PA 17241 (the "Project Site"). In May 2024, AAMPA submitted a pending application to the Pennsylvania Department of Environmental Protection ("PADEP" or the "Department") for an Individual NPDES Permit for Discharges of Stormwater Associated with Construction Activities (the "Application") to be undertaken at the Project Site. On April 24, 2025, PADEP issued a Draft of the NPDES Permit and subsequently published the Draft Permit in the Pennsylvania Bulletin to solicit public comment. The Department received several dozen written comments, many of which consisted of the same or similar form letter. In addition, the Department hosted a public hearing on the Draft Permit on August 14, 2025 in order to provide additional opportunity for the public to provide comment on the Draft Permit. Approximately 20 persons provided oral comment at the August 14 hearing. Between the oral and written comments, many of the comments that PADEP has received to date relate to potential impacts from the Project Site to Big Spring Creek (Designated High-Quality, Cold-Water Fishery), which, although it is over 3,000 feet from the Project Site, is the nearest stream, as well as potential impacts to water supply wells within the vicinity of the Project Site.

This letter does not seek to provide a response to all comments that PADEP has received. Instead, it summarizes and responds to some of the most significant and/or most-frequent comments that have been made in response to the Draft Permit, as further set forth below. Please also note that much of the information presented herein exists within the various forms, reports, narratives, design documents, and other materials that collectively comprise the Application, and references to such documents are made throughout the letter.

1. **Stormwater Control Measures in Karst** – Various commenters have raised concerns about AAMPA's proposed Stormwater Control Measures (SCMs) that are intended to minimize the potential for stormwater pollution from the Project Site. SCMs (also commonly referred to as best management practices (BMPs)) are practices or design features that are used to protect water quality and control rates of stormwater flow from a construction site through the management of post-development stormwater runoff. The Department's Erosion & Sediment Control regulations at 25 Pa. Code, Chapter 102 (the "E&S Regulations") refer to the Pennsylvania Stormwater Best Management Practices Manual (Doc. No. 363-0300-002, Dec. 30, 2006) (the "BMP Manual") as a way of satisfying the design standards in the E&S Regulations. Recognizing that the practices and techniques in the BMP Manual may not be necessary or appropriate for all sites, the E&S Regulations expressly allow project sponsors to employ alternative design standards or practices upon a showing "to the Department that the alternate BMP or design standard minimizes accelerated erosion and sedimentation or manages stormwater during and after the completion of earth disturbance activities to achieve the regulatory standards." 25 Pa. Code. § 102.11(b).

Many of the comments that PADEP has received on the Draft Permit relate to AAMPA's proposed SCMs and the compatibility of such measures with the Project Site's karst geology. The BMP Manual addresses SCMs in karst and offers many suggestions for environmentally-sound development at sites with such features. As a starting point, the BMP Manual recognizes that development at sites with karst geology requires careful assessment by environmental professionals to ensure that the SCMs proposed for a site are compatible with its unique hydrologic conditions, as certain of the recommendations in the BMP Manual may be better suited than others for a particular location. This fact is reiterated in the Department's Response to Comments Document for the BMP Manual, in which PADEP states in response to a comment about development in karst that the "[BMP] Manual will provide BMP standards, specifications, standard drawings, and other essential information to ***guide the user*** in the selection and development of stormwater BMPs, however ***it is not intended to replace the decision making of professionals in private practice***."

In developing its site plan and proposed SCMs, AAMPA has carefully assessed the site-specific features of the Project Site, and where technically feasible and environmentally sound, has adopted practices referenced in the BMP Manual, while at all times adhering to industry standards for development in karst. In certain instances, AAMPA has proposed alternate SCMs that are consistent with the standards in the BMP Manual, as further set forth below:

a. **SCMs Allowing Stormwater Infiltration or Surface Discharge –** There have been many successful infiltration SCMs developed in karst geology since the publication of the BMP Manual in 2006, including specifically in Cumberland County. In fact, it has become common practice to remove limestone rock during site construction and replace it with SCMs, as has been proposed at certain locations at the Project Site, as further described in the Application. The guidance in the BMP Manual, which discusses limits to the depths of limestone cuts, is not always feasible when performing earthwork at a given site, and is not the only guiding factor related to depth of disturbance. In this specific case, the Project Site's depth to groundwater far exceeds the deepest limestone cuts that have been proposed. This fact, along with the inclusion of the proposed filter media to be installed within the SCMs, will help to ensure that the stormwater runoff will be managed appropriately by filtering any stormwater before it enters the aquifer. Most of the SCMs proposed in the Application have been designed to receive stormwater runoff and evenly distribute the stormwater over the entire bed area before the stormwater is slowly introduced to the aquifer.

   For the locations at the Project Site where the underlying soil or geologic media does not allow for infiltration, the SCMs have been designed as Managed Release Concepts (MRC), which have been designed to slowly release filtered stormwater into the downstream drainage network for release at the surface. All of the MRC and non-MRC SCMs that are discussed in the Application meet the requirements of the BMP Manual.

b. **Loading Ratios –** Some commentors have questioned the proposed loading ratios for these SCMs. The SCMs for this project have been spread throughout the Project Site and, in most cases, have been horizontally expanded to their maximum area in order to minimize loading ratios to the extent practicable. While loading ratios are a guideline in the BMP Manual, there are additional factors that aid in furthering the BMP Manual's goals of preventing sinkhole formation and providing water quality benefits at the Project Site, such as using multiple, shallow basins to minimize hydraulic head in lieu of fewer, deeper basins, as well as incorporation of filter media to reduce pollutant loading. All 14 of AAMPA's Proposed SCMs, which include a combination of surface ponds and subsurface basins, have relatively low hydraulic head during common storm events. The benefit of low head pressure is that the SCMs will be able to sufficiently spread stormwater runoff throughout the structures so that stormwater management is not compromised by higher loading ratios or excessive hydrostatic pressures. For example, ten (10) out of 14 SCMs have ponding depths under two feet during the 2-year storm event; the four SCMs with ponding depth greater than two feet have been designed to have hydraulic head pressure less than three feet. In addition, all of

the measured “ponding depths” are taken from the infiltration surface within the SCM and do not account for the presence of media placed above the infiltration surface. For example, in many cases, the surface ponds that are proposed to have amended soil media will never reach the first stage of discharge, as the ponded runoff from the 2-year storm will be contained within the voids of the amended soil. If this same volume of water were introduced to an SCM without media (i.e. with 100% void space), the ponding depth likely would be reduced by two-thirds. For the same reason, subsurface SCMs have higher ponding depths for the same hydraulic head than surface ponds because the water is introduced into void spaces within the media.

c. **Groundwater Recharge –** The proposed SCMs promote responsible groundwater recharge within the Big Spring watershed. The Project Site is over 100 acres and so it is important to the local groundwater supply to ensure that a reasonable amount of stormwater runoff is allowed to infiltrate into the soil and return, after filtering through the SCMs, to the groundwater system. Groundwater recharge is important for maintaining cooler water temperatures and preserving the volume of groundwater available. The proposed SCMs will manage the projected stormwater runoff volume, meet the BMP Manual’s standards for water quality, and promote safe recharge of the local aquifer.

   While there are several SCMs that have been designed as MRCs, meaning they do not rely on infiltration to function, they do not prevent stormwater from infiltrating. Rather, they are conservatively designed with a small flow orifice to slowly release volume downstream if the soils / rock complex do not allow for infiltration.

d. **Alternative SCMs That Are Not Technically and/or Economically Feasible –** There are several SCMs identified in the BMP Manual that are not technically or economically feasible given the site-specific features of the Project Site. A few examples are highlighted below.

   i. Green Roof – A green roof is not capable of being practically implemented at a large warehouse project. Warehouses of the type planned for the Project Site are required to have large spans to accommodate the need for significant storage volumes, thereby limiting structural capacity. A green roof would introduce a large load that is incompatible with that design and require significant maintenance that would be impractical considering the size of a warehouse building. An unmaintained roof on a warehouse has the potential to lead to catastrophic failure.

   ii. Spray irrigation/Capture and Reuse – There is not enough applicable land remaining on the property to employ spray irrigation or capture and reuse. Furthermore, the method of storing stormwater in a subsurface reservoir and then applying it later to a field runs counter to the idea of maintaining groundwater recharge throughout the year. The SCMs proposed for this project are spread throughout the site and will slowly introduce runoff back into the groundwater table, as further discussed above.

   iii. Injection Wells – The concept of using injection wells for stormwater management is technically feasible in karst geology but is very expensive and not practical for a large project such as this. With an injection well, stormwater runoff is first pre-treated and concentrated before being injected directly into the groundwater. The proposed plan for the Project Site ensures that runoff is spread throughout the site and slowly infiltrated through the soil prior to reaching the groundwater, thereby avoiding the need to use injection wells. Furthermore, West Pennsboro Township has conditioned the land development approvals at the Project Site to avoid injection wells except as a last resort effort for stormwater management, due to concerns related to the injection of stormwater directly into the aquifer that is used by nearby properties for domestic water-supply wells. Injection wells are rarely used in Pennsylvania for stormwater management for this reason.

e. **Surface Water Sampling** – As set forth above, AAMPA's SCMs have been carefully designed to ensure water quality is maintained in the Big Spring Creek and in the local aquifer, and such SCMs are consistent with all requirements in the Department's BMP Manual. Nevertheless, AAMPA recognizes that many of the commenters have requested that additional monitoring in the Big Spring Creek be conducted to ensure that construction at the Project Site does not lead to a degradation of water quality in the stream. Consistent with these requests, AAMPA has worked to develop a surface water sampling plan for the purpose of assessing water quality impacts to Big Spring related to AAMPA's construction activities. A copy the plan for the Department's records is enclosed with this letter as **Appendix 1**.

   As further set forth in the plan, AAMPA will collect background water quality samples over a period of at least three months preceding construction at the Project Site to better understand baseline water quality in the stream. Thereafter, AAMPA will collect surface water quality samples in Big Spring Creek throughout the construction period on a periodic basis to ensure that adverse impacts do not occur or can be addressed immediately if warranted. AAMPA is confident that the enclosed sampling plan will demonstrate the effectiveness of the proposed SCMs included within the Application.

2. **Hydrocarbon Spill Prevention** – Various commenters have raised concerns about the potential release of petroleum hydrocarbons from the Project Site related to hypothetical spills from construction vehicles or delivery vehicles visiting the site. At the outset, it is important to recognize that this concern is speculative, as the commenters appear to be focused on the potential for accidental or catastrophic events that are unlikely to occur in the usual course of construction activities and eventual operation at the Project Site. Such concerns also are not unique to this project, as the potential for a release from an accident is no more likely at the Project Site than it would be anywhere else, including at other parcels or even roadways in the vicinity of Big Spring Creek. With respect to the Project Site itself, the proposed warehouse facilities will function similar to most warehouses throughout the Commonwealth where trucks are the primary means of transporting goods to and from the Project Site. AAMPA has not proposed to have a fueling depot on site. Likewise, there would be no reason for tanker trucks to visit the Project Site. It is also worth noting that standard practice among companies in the shipping and transportation sector dictates that delivery drivers are required to maintain fuel spill kits in their trucks in case of a fuel leak.

   For these reasons, the likelihood of a large fuel spill at the Project Site is very low. Notwithstanding that a fuel spill will be unlikely, AAMPA has developed the site plan to account for a worst-case scenario and to be sufficiently protective against any petroleum hydrocarbon pollution leaving the Project Site. For example, all the paved areas within the Project Site drain to inlets that will be fitted with FlexStorm filter bags. The FlexStorm filter bags are fitted with oil-capture membranes that capture petroleum hydrocarbons before they can be released to surface water or groundwater. To ensure that the filter bags remain effective, the filter media turns dark when contacted by hydrocarbons to provide an easy visual representation indicating that filter replacement is needed. As specified in the application, the filters are replaced according to a set schedule or whenever needed based on visual inspection.
   The Application also includes a set maintenance schedule for the FlexStorm filters, which can be found in the PCSM Operations and Maintenance notes and is included here for the Department's reference:

   <u>FlexStorm Inlet Filter Protection:</u>

   <u>Schedule:</u>
   -Inspection should occur following rain events greater than half an inch;

-Inspections should occur a minimum of 3 times per year, and in snowfall affected regions, inspections prior to and after snowfall season.

Inspection/Maintenance:
-Empty the filter bag manually or by industrial vacuum taking care not to damage the geotextile bag when more than half filled or during scheduled inspection period.
-Remove compacted silt from sediment bag and flush with medium spray.
-"PCP" style bags should be pressed or wrung to recover retained oils.
-Oil skimmer pouches solidify and darken when saturated, indicating time for replacement.
-Dispose of all oil-contaminated products and recovered oils in accordance with EPA guidelines. Oil skimmer pouches will not leach and can be disposed of directly.
-Inspect and replace bag if torn or punctured.

Replacement:
-Remove the bag by loosening or cutting off clamping band.
-Take the new correctly sized sediment bag and secure hose clamping band to the frame channel as previously removed.
-Ensure bag is secure and there is no slack around perimeter.

The design measures targeted at petroleum hydrocarbons that are discussed herein are intended to provide an extra layer of safety on top of the spill procedures that are standard among the transportation and shipping industry. When developing the site plan, AAMPA consulted with various trucking companies to assess their general spill response and readiness capabilities. AAMPA found that all such companies surveyed have in place spill reporting and response protocols required of their drivers and contractors. These protocols and procedures generally include notification to relevant state and local agencies and deployment of spill containment and cleanup materials such as booms and oil dry. In the unlikely event that an oil or fuel spill ever was to be mobilized by stormwater, the above-referenced SCMs have been designed to ensure that any potential impacts to surface or groundwater would be minimal. For all the reasons discussed herein, petroleum hydrocarbon pollution from the site is unlikely.

3. **Potential Impacts to Water-Supply Wells and Other Property** – Several commenters have raised concerns about the impacts that development of the Project Site might have on neighboring properties, including private (water-supply) wells. The above-referenced SCMs have been designed to ensure that development of the Project Site will be unlikely to result in impacts to nearby wells or other property. In addition to the site plans and post-construction stormwater measures that will be put in place at the Project Site, AAMPA is further obligated through its local land use approvals to ensure adequate protection of neighboring water-supply wells and other properties. For example, West Pennsboro Township's Conditional Use approval includes various conditions targeted at eliminating or reducing potential impacts of construction or the discharge of contaminated stormwater to neighboring properties, including the following measures:

    a. AAMPA is required to conduct a pre-blast survey of all properties within 800 ft. of the Project Site.

    b. AAMPA is required to establish an escrow account to address any potential damage to surrounding properties resulting from the construction of the Project Site including, but not limited to, wells, septic systems, and foundations. The escrow account must be initially funded with a minimum of $50,000. If the escrow balance drops below $10,000, AAMPA must replenish the balance to a minimum of $30,000. AAMPA must maintain the escrow account until one year after completion of the project, which is defined as the completion of construction of all proposed buildings, the issuance of certificates of occupancy, and the release of all improvements guarantees.

c. AAMPA is prohibited from using injections wells unless all other options have been exhausted.

d. AAMPA previously prepared geotechnical and hydrogeologic studies of the Project Site, which are included among the Application materials. The studies included geophysical testing, soil borings, test pits, monitoring well installation, and groundwater monitoring. The hydrogeologic study included an evaluation of the potential impact of the site on the underlying aquifer and concluded that adverse impacts to the aquifer and neighboring water supply wells are unlikely.

4. **Blasting** – Various commenters have raised concerns about potential impacts that could be caused by rock blasting associated with construction activities at the Project Site. Development of the Project Site will require limited blasting to bring the Project Site to appropriate grade. While blasting inherently fissures rock to allow for removal of the rock by excavation, impacts to the Project Site's overall geology, neighboring properties, and to surface water or groundwater are likely to be limited given the measures that AAMPA will employ during blasting activities and the mechanics of rock blasting itself.

   The June 2023 Geotechnical Report that was prepared by ECS Mid-Atlantic, LLC ("ECS") and submitted with the Application discusses that the peak particle velocities (*i.e.* the top speed that pieces of ground will move) from blasting at the Project Site will be limited to less than 2.0 inches/second to ensure the integrity of nearby structures. A peak particle velocity of 2.0 inches/second or less is a requirement of the Department's Noncoal Mining Rules. 25 Pa. Code § 77.564(m). Such requirement is based on a comprehensive 10-year study conducted by the U.S. Bureau of Mines that concluded that peak particle velocities of less than 2.0 inches/second are sufficiently protective of residential structures. *See* U.S. Bureau of Mines, Blasting Vibrations and Their Effects on Structures (1980). As outlined in the 2023 ECS Geotechnical Report, AAMPA will install vibration monitors at nearby structures to ensure that peak particle velocities are maintained within the appropriate range.

   The physics of blasting itself will further ensure that impacts to the Project Site's underlying geology and neighboring properties is minimized, as the energy that is released during a blast is directed upwards to fracture rock, not downward. The upward dispersion of energy follows the path of least resistance, which enables site development to be carried out in a way that does not cause undue impacts to underlying geologic features or neighboring properties.

   Various commenters have expressly raised concerns about blasting at the site creating sinkholes. While blasting in theory could "expose" incipient sinkholes or other hollow features below the surface of the Project Site, the Application entails the steps that AAMPA will take to remediate any such features, as further set forth herein. Localized shallow incipient sinkholes could develop at the Project Site during the initial stages of earthwork due to earth disturbance, changes to surficial drainage patterns, and vibration and loading from equipment and blasting. The Application specifies that any karst features encountered during construction will be remediated in a timely manner in coordination with AAMPA's geotechnical engineer, general contractor, and earthwork contractor. AAMPA also notes that there are existing sinkholes and surface depressions currently within the Project Site's agricultural fields that were identified as part of the geotechnical evaluation included with the Application materials. As part of AAMPA's construction plan for the Site, these existing features will be remediated during the initial stages of earthwork, thereby mitigating any potential negative impacts such features presently may be having on local water quality.

   Finally, certain commenters have linked AAMPA's proposed blasting plan with water quality impacts to surface or groundwater. Given the depth to groundwater at the Project Site – greater than 77 feet and more than 30 feet below the deepest planned excavation – and that AAMPA's geophysical investigations did not identify any karst features and fractures in the area where proposed stormwater basins will be located, it is unlikely that blasting will create conduits to the groundwater table. During

blasting operations, as described above, the energy from the blast is directed upward, making impacts to groundwater less likely. If broken or intermittent rock is encountered at the bottom of a blast zone, excavation of the blast materials will include stabilization of remaining subgrade materials to limit the potential for migration of soil particles deeper into the rock fractures or to the water table. Stabilization may include over-excavation of broken rock, the construction of rock filters, and/or the use of geotextiles. Furthermore, the Application documents include a detail that requires the contractor to remediate exposed rock beneath the stormwater SCMs by building up a 2 ft. soil layer. This detail will effectively create an engineered filtration layer that will allow runoff to slowly filter through soil before migrating through rock to the groundwater table, further mitigating any potential impact. Additionally, AAMPA will promptly remediate any incipient sinkholes that are exposed during blasting operations, which will ensure that any rapid connectors to the groundwater table are sealed.

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AAMPA appreciates the Department's attention to the information that has been provided in this letter. If PADEP has any questions or would like to discuss any of these topics in further detail, please do not hesitate to reach out. We look forward to continuing to work collaboratively with the Department.

Sincerely,

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