

Phillips, Nathan

From: Phillips, Nathan
Sent: Tuesday, October 17, 2023 10:14 AM
To: dkoerner@prologis.com
Cc: tstager@pennoni.com; Simmons, Eric; Williamson, Scott; Whittington, Alexandra R
Subject: PAC220379 Prologis 7464-7600 Linglestown Road Elevated Review
Attachments: PAC220379 ER 20231017.pdf

Mr. Koerner

The District and the DEP have completed the review of the response documents for the subject application and have identified remaining deficiencies. In accordance with the DEP Permit Review Policy, the application is in the Elevated Review stage of the permit review process. Attached is the Elevated Review Letter outlining the remaining items. Please let me know that you are able to view the document.

After you have had the opportunity to review the document, if needed, contact me to schedule a conference call to discuss any questions you may have regarding the remaining deficiencies. The DEP is available the following dates and start times for a virtual meeting:

October 20 – 9 am
October 24 – 9 am
October 25 – 9 am

Meeting times are on a first come, first serve basis and are not confirmed until all interested entities have responded. The DEP calendars fill quickly; please respond as soon as possible to better ensure your selected time is available. The DEP will send a Microsoft Teams meeting invitation once a consensus of the date and time has been achieved.

Best Regards

Nathan Phillips, P.E. | Permits Section Chief
Department of Environmental Protection | Waterways and Wetlands Program
Southcentral Regional Office
909 Elmerton Avenue | Harrisburg, PA 17110
Phone: 717.705.4798 | Fax: 717-705-4760
www.dep.pa.gov

From: Phillips, Nathan
Sent: Friday, August 11, 2023 3:02 PM
To: 'dkoerner@prologis.com' <dkoerner@prologis.com>
Cc: 'tstager@pennoni.com' <tstager@pennoni.com>; Simmons, Eric <ersimmons@pa.gov>
Subject: PAC220379 Prologis 7464-7600 Linglestown Road Technical Deficiencies

Mr. Koerner

The District and the DEP have completed the review of the subject application and have identified technical deficiencies. Attached is the technical deficiency letter. Please let me know that you are able to view the document; hard copies will not be sent unless requested. Thank you.

Best Regards

Nathan Phillips, P.E. | Permits Section Chief
Department of Environmental Protection | Waterways and Wetlands Program
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October 17, 2023

Mr. David Koerner
Prologis LP
400 Boulder Drive, Suite 200
Breinigsville, PA 18031

Re: Notification of Elevated Review Letter
Prologis 7464-7600 Linglestown Road
NPDES Permit Application No. PAC220379
West Hanover Township, Dauphin County

Dear Mr. Koerner:

On February 14, 2023 the Dauphin County Conservation District (District) determined the above-referenced NOI to be complete. On August 11, 2023, the Department of Environmental Protection (DEP) notified you by letter that this NOI contained technical deficiencies and included a list of the required/deficient information.

The District and the DEP have reviewed your response submission received on September 26, 2023 and determined that your NOI still contains technical deficiencies. Pursuant to DEP's Permit Review Process and Permit Decision Guarantee Policy (Document # 021-2100-001), your NOI has entered the Elevated Review process.

The following is a list of the remaining technical deficiencies with your application:

1. Technical Deficiency 7 from the DEP's Technical Deficiencies Letter, dated August 11, 2023, has not been adequately addressed: **Wetlands are a surface water in which a surface water demonstration that rate control, volume management, and water quality compliance is to be provided. In addition, the projects impact on subsurface hydrology are to be analyzed to better ensure the wetlands continue to receive groundwater in a manner that mimics pre-development conditions and will protect the existing and designated use functions and values. The project proposes work upslope and immediately adjacent to the wetlands and several analysis points may be necessary to demonstrate all areas of the wetland are project and maintained. The DEP did not locate an analysis for Wetlands C and D that are down gradient of PCSM BMP 5. As a part of the demonstration, provide the following: [25 Pa. Code §102.8(g)(3), §102.8(g)(2), §102.8(g)(3), and §102.8(g)(6)]**
 - a. **A clear demonstration of the primary source of hydrology to each wetland point of analysis. The groundwater or seasonal high groundwater elevations should be located upslope of the wetlands to better show the moment of the table.**
 - b. **Pre- and Post-construction infiltration volumes for the upslope contributing areas to the point of analysis at the wetland.**

- c. **A discussion on the project's effect on groundwater movement from the excavation, compaction, and installation of below grade barriers (walls, clay cores, key trenches) as well as the impervious covering that redirects and concentrates surface water that would have otherwise percolated into the permeable areas of the site and become groundwater.**

The following deficiencies are generated from the additional information:

- a. Analysis points are to be at the upper gradient of the surface water. Revise the drainage boundaries and supporting calculations to reflect the contributing drainage areas at the upper boundary of the wetlands.
 - b. There is disparity in the scale and value between pre- and post-condition wetland drainage areas. Specifically, the drainage area values do not make sense given the provided labels and delineated boundaries as shown between pages 1105 and 1106 of Appendix J. DEP acknowledges that pipe networks drain to the PCSM BMPs and/or level spreaders but notes that these contributing areas are not included in the post-construction drainage area mapping. Review and revise as appropriate such that the delineated drainage areas in pre- and post-condition are represented correctly in both scale and labelled value, ensuring to update subsequent computations resultant of the change.
 - c. DEP acknowledges that an analysis and discussion was provided regarding the pre- and post-condition volumes. However, this analysis specifically focuses on Wetlands C and D. Provide a detailed analysis/discussion for the other impacted on-site Wetlands A, B, and H. DEP makes note that Wetland A is showing an increase in overall contributing runoff volume while Wetlands B and H are showing decreases in overall contributing runoff volume (Wetland B being substantially so). As such, provide further justification that the decreases in contributing runoff volume for Wetlands B and H will not negatively impact the existing and designated use functions and values of these wetlands given the change in surface/subsurface hydrology.
2. Technical Deficiency 9 from the DEP's Technical Deficiencies Letter, dated August 11, 2023, has not been adequately addressed: **There is disparity regarding the Level Spreader 7 lip elevation between the *Level Spreader 7* detail (528.5') [E&S Plans, Sheet 19 of 19 & PCSM Plans, Sheet 5 of 10] and the *Level Spreader Design Calculations LS-7* computations sheet (530.0') [PCSM Report, Page 373 of 820]. Review and revise as appropriate. [25 Pa Code §102.8(f)(6) and 25 Pa Code §102.8(f)(9)]**

The DEP notes the following:

- a. The *Level Spreader Design Calculation LS-7* computations, PCSM Report page 462 of 1143, show a level spreader lip elevation of 525.50' while the *Level Spreader 7* detail, PCSM Plan 5 of 10, shows a lip elevation of 528.0'. Review and revise as appropriate for uniformity.
- b. The *Level Spreader Design Calculation LS-2* computations, PCSM Report page 458 of 1143, show a level spreader lip elevation of 529.0' while the *Level Spreader 2* detail,

PCSM Plan 5 of 10, shows a lip elevation of 530.0'. Review and revise as appropriate for uniformity.

- c. The *Level Spreader Design Calculation LS-3* computations, PCSM Report page 459 of 1143, show a level spreader lip elevation of 529.0' while the *Level Spreader 3* detail, PCSM Plan 5 of 10, shows a lip elevation of 530.0'. Review and revise as appropriate for uniformity.

2. Technical Deficiency 11 from the DEP's Technical Deficiencies Letter, dated August 11, 2023, has not been adequately addressed: **There is disparity regarding the BMP 5 bottom elevation between the *Permanent Facility Cross Section at Outlet Structure* detail (557') [PCSM Plan Sheet, 6 of 10] and the *Dry Detention Basin Cross Section* (558') [PCSM Plan Sheet, 7 of 10]. Further, neither detail seems to be appropriate given that a riser/outlet structure is not being proposed for BMP 5 (shown as a simple headwall in plan view). Review and revise as appropriate. [25 Pa Code §102.8(f)(6) and 25 Pa Code §102.8(f)(9)]**

The DEP notes the *Dry Detention Basin Cross Section* schedule, PCSM Plan 7 of 10, stills shows a bottom elevation of 558.0' but without further specification if that elevation is the start or end of the sloped basin bottom. The provided response indicates that the basin bottom is sloped from 558.0' to 557.0' but this is not explicitly mentioned or noted on the cross section. Clarify this on the cross section and associated schedule to avoid confusion.

3. Technical Deficiency 13 from the DEP's Technical Deficiencies Letter, dated August 11, 2023, has not been adequately addressed: **There is disparity regarding the BMP 9 outlet pipe invert between the *Outlet Structure - OS-9* detail (563.3') [PCSM Plans, Sheet 7 of 10] and the hydraulic computations (564.5') [PCSM Report, Page 242 of 820]. Review and revise as appropriate. [25 Pa Code §102.8(f)(6) and 25 Pa Code §102.8(f)(9)]**

The DEP notes that *Outlet Structure - OS-9* detail, PCSM Plan 7 of 10, has internal disparity regarding the 18" SLPEP outlet pipe invert. The left-most view detailing Section A-A shows an outlet invert of 564.50' while the right-most view detailing Section B-B shows an outlet invert of 563.0'. Review and revise for uniformity.

4. Technical Deficiency 16 from the DEP's Technical Deficiencies Letter, dated August 11, 2023, has not been adequately addressed: **Confirm that the area around Wetland J has been investigated for a potential dump area of construction and/or other wastes. If found, clarify if the wastes will be removed from the site and disposed of in a permitted land fill. [25 Pa. Code §102.4(b)(5)(xi) and §102.8(f)(3)]**

The DEP acknowledges that waste removal has been called out in the construction sequence. However, the DEP did not locate any results of additional investigation that confirms if wastes are present and the extent of the wastes to be removed. Confirm that the area around Wetland J has been investigated, provide the results, a plan location, and area of waste to be removed.

You must submit a response fully addressing each of the technical deficiencies set forth above.

Please note that this information must be received within 10 business days from the date of this letter, on or before October 31, 2023 or DEP may deny the NOI.

Please submit 2 copies of the revised information to the District at 1451 Peter's Mountain Rd, Dauphin, PA 17018, and an electronic copy to the DEP via the DEP's OnBase system (<https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>). For ease of review, the DEP requests a single upload with multiple files versus a single upload with one large document. **Please do not upload ZIP files.** Use the following OnBase form codes:

Form Name/NO. – Chapter 102 General NPDES Permit (PAG-02)
Resubmittal - No

Please be advised that if your response does not satisfy the technical deficiencies, your NOI may be denied. 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 NOI is denied, there is no recovery of fees available; however, if you voluntarily withdraw the NOI and then submit a new NOI for the same project, previously paid disturbed acreage fess will be reapplied to the new NOI.

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 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 the information contained in this letter, please contact Mr. Eric Simmons by e-mail at ersimmons@pa.gov or by telephone at 717.705.4779 and refer to Application No. PAC220379.

Sincerely,

Nathan Phillips
Digitally signed by Nathan Phillips
Date: 2023.10.17 10:06:11 -04'00'

Nathan Phillips, P.E.
Permits Section Chief
Southcentral Regional Office

cc: Dauphin County Conservation District
Todd Stager, P.E., Pennoni