pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

February 28, 2024

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

Re: Elevated Review Response Technical Deficiencies
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. On October 17, 2023, the DEP notified you by letter that this NOI contained remaining technical deficiencies and included a list of the required/deficient information.

The District and the DEP have reviewed your response submission received on December 12, 2023 and determined that your NOI still contains technical deficiencies.

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, and Technical Deficiency 1 from the DEP's Notification of Elevated Review Letter, dated October 17, 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 (received on November 8, 2023):

i. 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.

ii. 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.

iii. 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.

The following are additional deficiencies generated from the response documents received on December 12, 2023: *[25 Pa. Code §102.8(b)(8), §102.8(f)(8), §102.8(f)(6)]*

A. Wetland A – The drainage area to the wetland includes area to the east of the wetland that appears to bypass Wetland A and contributes to Wetland B leading to a reported greater volume reported then the wetland receives. Also, the Wetland A paragraph on Page 22 of the PCSM report indicates an infiltrated volume will be received from BMP 4 and the undetained constructed slope to the west of the wetland; however, this constructed slope terminates in a retaining wall that will divert surface water away from Wetland A in addition to potentially limiting groundwater movement towards Wetland A. A retaining wall detail or other information was not located to determine if the wall allows for groundwater movement from the slope to the wetland. The lever spreader (BMP 12) is reported to provide hydrology to

the wetland; however, absent additional geological and groundwater information, by topography, the flow from the level spreader will only reach the lower areas of Wetland A. Revise the NOI documents to demonstrate how the hydrology will be maintained to Wetland A in a manner that maintains the existing use, functions and values of Wetland A.

B. Wetland B – Given the drainage area deficiencies for Wetland A, the demonstration that hydrology will be maintained to Wetland B in a manner that maintains the existing use, functions and value has not been provided. In addition, infiltrated hydrology from BMPs 6 and 7 are shown to be contributing to Wetland B, however, any potential infiltrated volume from the BMPs is down gradient of the wetland and will not contribute to the wetland. Revise the NOI documents to demonstrate how the hydrology will be maintained to Wetland B in a manner that maintains the existing use, functions and values of Wetland B. *[25 Pa. Code §102.8(g)(4)]*

C. Wetland C – The wetland was analyzed as a single point; however, the topography is such that a minimum of 3 areas of the wetland should be analyzed separately to better ensure the entire wetland area will be maintained. In addition, the proposed access road with multiple utilities, is immediately adjacent to the wetland and appears to restrict hydrology from the upslope area. Revise the NOI documents to demonstrate how the hydrology will be maintained to Wetland C in a manner that maintains the existing use, functions and values of Wetland C.

D. Wetland H – The wetland was analyzed as a single point; however, the topography is such that a minimum of 2 areas of the wetland should be analyzed. By topography, the majority of the wetland receives hydrology from a narrow area north of the wetland. The analysis provided includes a large undetained area that appears to only contribute to a narrow portion of the wetland along the southern side. In addition, the infiltrated volume from BMP 3, claimed to provide hydrology to the wetland, contributes to the undetained area that bypasses the upper most reaches of the wetland. Revise the NOI documents to demonstrate how the hydrology will be maintained to Wetland H in a manner that maintains the existing use, functions and values of Wetland H.

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 March 15, 2024 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's Public Upload (PU) (https://greenport.pa.gov/ePermitPublicAccess/PublicSubmission/Home). 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 Submission Information:

Resubmittal – No
Filter Submission Type by Program - For CCD Use Only – Chapter 102 Permit
Request Type – Other
Permit #/Project # - PAC220379
Applicant EIN – Include if known

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 me via email, natphillip@pa.gov and refer to NOI number PAC220379

Sincerely,

Nathan Phillips Digitally signed by Nathan Phillips
Date: 2024.02.28 12:29:05 -05'00'

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

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