



**GILMORE & ASSOCIATES, INC.**  
ENGINEERING & CONSULTING SERVICES

January 23, 2020

File No. 2012-07083

Christopher Smith, P.E., Civil Engineer Manager  
Department of Environmental Protection  
2 East Main Street  
Norristown, PA 19402

Reference: Email Request for Explanation of Changes  
Project Name: Elcon Recycling  
NPDES Construction Permit Application No. PAD090044  
Falls Township, Bucks County, PA  
Plan Revision Date: January 17, 2020

Dear Mr. Smith:

Gilmore & Associates, Inc. is in receipt of your email request for a PDF document explaining the revisions from the initial submission of the above referenced project, dated October 7, 2019, as compared to the most recent submission on January 17, 2020. The specific portions that have changed are clouded on the attached plans and documents, and the changes are explained below:

### **Plan Revisions**

#### **Sheet 1 – Overall PCSM Plan:**

1. PA DEP Resubmission dated 01/17/2020 was added to the revision block.
2. BMP 6.7.3 Soil Amendment hatch was revised to cover all proposed pervious areas within the limit of disturbance (LOD) that do not drain to the proposed MRC Basin and are not already mitigated by BMP 5.6.1 Minimized Grading Area.
3. Three (3) notes added, each stating, “BMP 6.7.3 Soil Amendment in Drainage Area A2 to bypass MRC Basin to POI-A Total Area = 70,433 sf (1.62 ac)”.
4. One (1) note added, stating, “BMP 6.7.3 Soil Amendment in Drainage Area B to POI-B Total Area = 4,714 sf (0.11 ac)”.
5. One (1) note added, stating, “39,894 sf (1.20 ac) amended soil in MRC Basin not included in BMP 6.7.3 Soil Amendment calculations”.

#### **Sheet 2 – PCSM Plan:**

1. PA DEP Resubmission dated 01/17/2020 was added to the revision block.
2. BMP 6.7.3 Soil Amendment hatch was revised to cover all proposed pervious areas within the limit of disturbance (LOD) that do not drain to the proposed MRC Basin and are not already mitigated by BMP 5.6.1 Minimized Grading Area.

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3. Four (4) notes added, each stating, “BMP 6.7.3 Soil Amendment in Drainage Area A2 to bypass MRC Basin to POI-A Total Area = 70,433 sf (1.62 ac)”.
4. One (1) note added, stating, “BMP 6.7.3 Soil Amendment in Drainage Area B to POI-B Total Area = 4,714 sf (0.11 ac)”.
5. One (1) note added, stating, “39,894 sf (1.20 ac) amended soil in MRC Basin not included in BMP 6.7.3 Soil Amendment calculations”.
6. The level spreader design was revised to include:
  - a. OCS-2 (15” HDPE clean-out tee with open grate), Rim:13.50, Inv:12.25
  - b. 50 lf of 8” perf. HDPE level spreader, Inv:12.25
  - c. 8’Wx51’L North American Green Eronet P300 Turf Matting (or approved equal)
7. The MRC Basin discharge pipe from OCS-1 to OCS-2 was revised from 45 lf of 15” RCP to 48 lf of 15” HDPE.
8. “MRC Basin Amended Soil Specifications” were added to the plan.

Sheet 3 – PCSM Details 1:

1. PA DEP Resubmission dated 01/17/2020 was added to the revision block.
2. Impermeable PVC Liner specs were added to the plan.
3. The Basin Underdrain Detail was revised to include a 6” envelope of AASHTO #57 stone around the 4” perforated HDPE underdrain and notes were added to ensure compliance with the 13 MRC Design Standards.

Sheet 4 – PCSM Details 2:

1. PA DEP Resubmission dated 01/17/2020 was added to the revision block.
2. A detail of the proposed level spreader was added to the plan to ensure compliance with the recommendations of DEP’s PCSM Manual on page 248 of Chapter 6.

Sheet 5 – Overall Erosion & Sediment Control Plan:

1. PA DEP Resubmission dated 01/17/2020 was added to the revision block.
2. BMP 6.7.3 Soil Amendment hatch was revised to cover all proposed pervious areas within the limit of disturbance (LOD) that do not drain to the proposed MRC Basin and are not already mitigated by BMP 5.6.1 Minimized Grading Area.
3. “Procedural Act 2 Notes” were added to the plan at the request of PA DEP.

Sheet 6 – Erosion & Sediment Control Plan:

1. PA DEP Resubmission dated 01/17/2020 was added to the revision block.

Sheet 7 – Erosion & Sediment Control Details 1:

1. PA DEP Resubmission dated 01/17/2020 was added to the revision block.

Sheet 8 – Erosion & Sediment Control Details 2:

1. PA DEP Resubmission dated 01/17/2020 was added to the revision block.

**Document Revisions**

Act 2 Approval Letter:

1. A copy has been included with this resubmission at the request of PA DEP.

Non-Use Aquifer Determination Compliance Letter:

1. A copy has been included with this resubmission at the request of PA DEP.

BCCD Application for Chapter 102 and/or NPDES Review Information Form:

1. Most Recent Revision Date has been revised to 01/17/2020.
2. Administrative Incomplete box has been unchecked.

Application for an Individual NPDES Permit for Stormwater Discharges Associated with Construction Activities:

1. Section D.3 for POI-A:
  - a. Volume of stormwater runoff boxes 4, 6, 7, and 8 have been revised.
  - b. Peak rate analysis boxes 9, 11, 12, 14, and 15-20 have been revised.
2. Section D.4 for POI-A:
  - a. Lined MRC Basin Rate Control, Volume Control, and Water Quality values have been revised for Volume of stormwater treated.
  - b. Soil Amendment Volume Control and Water Quality values have been revised for Volume of stormwater treated and Acres treated.
3. Section D.3 for POI-B:
  - a. Volume of stormwater runoff boxes 4, 6, and 8 have been revised.
  - b. Peak rate analysis boxes 9, 11, 12, 14, 15, 17, 18, and 20 have been revised.
4. The Certification signature in Section I has been updated.

Completeness Review Checklist:

1. Permit filing fee of \$1,500 for an individual permit has already been paid to the appropriate Clean Water Fund.
2. Disturbed acre fee has already been paid to the Commonwealth of Pennsylvania Clean Water Fund.
3. Page Numbers have been revised for both of the two (2) items in §102.4(b)(5)(viii).
4. Page Numbers have been revised for one (1) of the two (2) items in §102.4(b)(5)(xii).
5. Page Numbers have been revised for two (2) of the four (4) items in §102.8(f)(2).
6. Page Numbers have been revised for two (2) of the six (6) items in §102.8(f)(4).
7. Page Numbers have been revised for all of the five (5) items in §102.8(f)(8).
8. Page Numbers have been revised for one (1) of the four (4) items in §102.8(f)(12).

General Information Form – Authorization Application:

1. The Certification signature on page seven (7) has been updated.

Post-Construction Stormwater Management (PCSM) Report:

1. The Revised date has been changed to January 2020.
2. The page numbers in the Table of Contents have been updated.
3. The Date on the Project Data Sheet (page 1) has been updated.
4. The values in the Land Cover Breakdown Table 4 (page 13) have been updated.
5. The area values for the Pre-Development Points of Interest (page 16) have been updated.
6. The values in the Peak Discharge Rate Table 5 (page 17) have been updated.
7. The values for POI-A in the Limit of Disturbance (LOD) Calculations (page 27) have been updated.
8. NPDES Worksheets 1 and 3-5 for POI-A have been updated (pages 29 and 31-33).

9. NPDES Worksheets 1 and 3-5 for POI-B have been updated (pages 35 and 37-39).
10. The Calculated Managed Volume by the proposed MRC Basin has been updated in the Stormwater BMP Information Chart 5.B (page 46).
11. The Managed Release Concept (MRC) Design Summary has been updated (page 48).
12. A description of how each of the 13 MRC Design Standards are being addressed has been added to Section 8.2 (pages 49-51).
13. A description of how the proposed level spreader meets the recommendations of DEP's PCSM Manual has been added to Section 8.2 (page 52).
14. The BMP Dewatering Calculations have been updated (pages 55-57).
15. The BMP Storage Calculations have been updated (pages 59-61).
16. The CN Calculations for Hydrograph Reports have been updated (pages 69-71).
17. The 1-Year through 100-Year Hydrograph Reports have been updated (pages 76-148).
18. A Pre-Development Drainage Area Plan has been added to the end of the PCSM Report.
19. A Post-Development Drainage Area Plan has been added to the end of the PCSM Report.

Erosion and Sediment Control (E&S) Report:

1. The Revised date has been changed to January 2020.
2. The page numbers in the Table of Contents have been updated.
3. The Date on the Project Data Sheet (page 1) has been updated.
4. The values in the Peak Discharge Rate Table 1 (page 7) have been updated.
5. The Pre- and Post-Development 2-Yr/24-Hr Design Storm Hydrograph Reports have been updated (pages 32-43).

If you have any questions regarding the information above or the information submitted, please contact this office.

Sincerely,



Erik Garton, P.E.  
Vice President  
Gilmore & Associates, Inc.

JEG/bms/sl

Enclosures: Referenced Documents

cc: Zvi Elgat, Elcon Recycling Services, LLC  
Virginia Cain, PA Department of Environmental Protection  
Jesse Duncan, PA Department of Environmental Protection  
Rich Krasselt, Bucks County Conservation District