



January 29, 2020

Zvi Elgat  
Elcon Recycling Services, LLC  
1720 Walton Road  
Blue Bell, PA 19422-2305

Re: Additional Technical Comments  
Project Name: Elcon Recycling  
NPDES Construction Permit Application No. PAD090044  
Falls Township  
Bucks County  
Plan Revision Date: January 17, 2020

Dear Zvi Elgat:

The Department of Environmental Protection (DEP) and the Bucks County Conservation District (District) have reviewed the above-referenced application and have 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.

The technical deficiencies void the permit decision guarantee and any agreements that have been made regarding the timeline for the permit application review. DEP will continue to follow the permit review process procedures in the review and processing of this permit application.

#### **Technical Deficiencies**

---

(Comment Nos. 1 through 8 are in reference to the same comment numbers contained in the previous Technical Deficiency Letter, dated December 18, 2019. Comment Nos. 9 and 10 are new.)

1. This comment has been addressed.
2. This comment has been addressed.

3. **Previous Comment:** For the MRC BMP, please indicate within the Post Construction Stormwater Management (PCSM) narrative how each of the 13 MRC Design Standards are being addressed. Where appropriate, please reference the page numbers where any applicable calculations/demonstrations can be found. [Section 102.8(g)(2)]

*New Comment:* Please address the following remaining deficiencies related to the previous comment:

- a. *To show compliance with MRC Design Standard No. 2, please provide the calculation which results in the equivalent impervious area value of 6.54 ac.*
  - b. *To show compliance with MRC Design Standard No. 6, please indicate on the plan drawings that at least 75 percent of the surface of the MRC BMP will be vegetated. [Section 102.8(g)(2)]*
4. This comment has been addressed.
5. This comment has been addressed.
6. This comment has been addressed.
7. This comment has been addressed.
8. This comment has been addressed.
9. *New Comment:* Each PCSM Worksheet 4 (for both POIs and for the MRC basin) utilize the ground cover of "brush" (with a curve number of 65) for the existing conditions instead of meadow (which has a curve number of 71 for soil type C per TR-55). Please make any appropriate revisions to ensure compliance with Section 102.8(g)(2)(i), which states that "existing predevelopment nonforested pervious areas must be considered meadow in good condition or its equivalent . . ." [Section 102.8(g)(2)(i)]
10. *New Comment:* Please add signed P.E. seals to all PCSM Plan drawings with a structural PCSM BMP. [Section 102.8(f)(9)]

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, or DEP may deny the application.

Please submit a response letter addressing the above comments and three copies of the revised information to the District at 1456 Ferry Road # 704, Doylestown, PA 18901, and two copies of the revised information to DEP at the address located in the first page footer.

Please coordinate with the District prior to resubmitting. The District may require a District application and/or additional fees associated with your resubmission.

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 your application, please contact Mr. Jesse Duncan by e-mail at [jeduncan@pa.gov](mailto:jeduncan@pa.gov) or by telephone at 484.250.5826 and refer to Application No. PAD090044, to discuss your concerns or to schedule a meeting. You must attempt to schedule any meeting within the 30 calendar days allotted for your reply.

Sincerely,



Christopher Smith, P.E.  
Chief, Construction Permits Section  
Waterways and Wetlands

cc: Mr. Garton, P.E. – Gilmore & Associates, Inc.  
Mr. Krasselt – Bucks County Conservation District  
Falls Township Engineer  
Ms. Cain  
Mr. Duncan  
Mr. C. Smith, P.E.  
Mr. Hohenstein, P E.  
Re 30 (GJS20WAW)28-3