COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGES OF STORMWATER ASSOCIATED WITH CONSTRUCTION ACTIVITIES
ANTIDEGRADATION ANALYSIS MODULE 3

Applicant: **CRG Services Management, LLC**

Project Site Name: **2951 Betz Court Site**

Surface Water Name: **001 - UNT to Jordan Creek (via onsite Wetland J)**
002 - UNT to Jordan Creek (via onsite Wetland L)
003 - UNT to Jordan Creek (via onsite sheet flow)

Surface Water Use: **HQ-CWF, MF**

ANTIDEGRADATION – EROSION AND SEDIMENT CONTROL (E&S) PLAN

☐ A **Non-Discharge Alternative will be utilized** for the project that will either individually or collectively eliminate the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm during earth disturbance activities.

Identify the E&S BMP(s) that will be utilized to achieve the non-discharge alternative:

- ☐ Alternative Siting: Location
- ☐ Alternative Siting: Configuration
- ☐ Alternative Siting: Location of Discharge
- ☐ Other: _____
- ☐ Limiting Extent & Duration of Disturbance
- ☐ Riparian Buffer (150 ft min.)
- ☐ Riparian Forest Buffer (150 ft min.)
- ☐ Limited Disturbed Area

Explain how the E&S BMP(s) will individually or collectively eliminate the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm during earth disturbance activities.

N/A

If a **Non-Discharge Alternative will not be utilized**, explain the rationale for non-selection, including why none of the alternatives are considered environmentally sound and cost-effective.

See E&S Report pages 3-4 - Antidegradation - Non-discharge Alternatives Evaluation

☒ **Antidegradation Best Available Combination of Technologies (ABACT) BMP(s) will be utilized** for the project that will either individually or collectively manage the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm during earth disturbance activities.

Identify the ABACT E&S BMP(s) that will be utilized:

- ☐ Rock Construction Entrance with Wash Rack
- ☐ Wheel Wash
- ☐ Pumped Water Filter Bag with Sump Pit
- ☐ Compost Filter Berm (HQ Only)
- ☐ Silt Fence with Vegetative Filter Strip
- ☐ Wood Chip Filter Berm (HQ Only)
- ☐ Sediment Basin with Perforated Riser (HQ Only)
- ☐ Stone Inlet Protection with Compost Layer (HQ Only)
- ☐ Embankment Sediment Trap with Compost Layer (HQ Only)
- ☐ Sediment Trap with Perforated Riser (HQ Only)
- ☐ Erosion Control Blankets within 50 ft of Surface Waters
- ☐ Flocculant with PAMs
- ☐ Riparian Buffer (< 150 ft)
- ☐ Rock Construction Entrance with Street Sweeping
- ☒ Pumped Water Filter Bag with Compost Sock Ring
- ☒ Compost Filter Sock
- ☐ Weighted Sediment Filter Tube (HQ Only)
- ☐ Super Silt Fence with Vegetative Filter Strip
- ☐ Vegetative Filter Strip (HQ Only)
- ☒ Sediment Basin with Skimmer
- ☐ Compost Filter Sock Sediment Trap
- ☐ Embankment Sediment Trap with Compost Sock
- ☐ Sediment Trap with Skimmer
- ☒ Immediate Stabilization
- ☐ Vegetative Conveyance
- ☐ Riparian Forest Buffer (< 150 ft)

☒ Approved Alternative: **Extended Rock Construction Entrance**

Explain how the E&S BMP(s) will individually or collectively manage the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm during the earth disturbance activities.

Nearly all of the disturbed area of the site will be controlled by sediment basins with skimmers, which manage stormwater volume, rate and quality by slowly releasing clean water from the top of the basin. Very small portions of the site will be controlled by compost filter sock. Due to the small size of these areas, no increase is proposed with respect to volume or rate, and the compost filter sock will remove any pollutants and maintain quality.

ANTIDEGRADATION – POST-CONSTRUCTION STORMWATER MANAGEMENT (PCSM) PLAN

☒ A **Non-Discharge Alternative will be utilized** for the project that either individually or collectively eliminate the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm after earth disturbance activities.

Identify the PCSM BMPs that will be used to achieve the non-discharge alternative:

- ☐ Alternative Siting: Location
- ☐ Alternative Siting: Configuration
- ☐ Alternative Siting: Location of Discharge
- ☒ Infiltration
- ☐ Other: _____
- ☐ Low Impact Development
- ☐ Riparian Buffer (150-ft. min.)
- ☒ Riparian Forest Buffer (150-ft. min.)
- ☐ Water Reuse

Explain how the PCSM BMP(s) will individually or collectively eliminate the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm after earth disturbance activities.

The proposed SWM/BMP Facilities will eliminate the net change in stormwater volume, rate, and water quality by first infiltrating a significant portion of the stormwater runoff, thus removing volume, then impounding stormwater and slowly releasing, thus decreasing rate, and then filtering pollutants through the provided engineered soil mixture and vegetation which improves water quality for all stormwater which does leave the site. Any stormwater which is released from SWM/BMP Facility #2 will have its volume and water quality reduced to required levels by the downstream proposed Forested Riparian Buffer.

If a **Non-Discharge Alternative will not be utilized**, explain the rationale for non-selection, including why none of the alternatives are considered environmentally sound and cost-effective.

N/A

☐ **Antidegradation Best Available Combination of Technologies (ABACT) has been selected** for the project that will either individually or collectively manage the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm after earth disturbance activities.

Identify the ABACT PSCM BMPs that will be utilized:

- ☐ Rain Garden (with Infiltration)
- ☐ Rain Garden (without Infiltration)
- ☐ Constructed Filter
- ☐ Vegetated Swale
- ☐ Vegetated Filter Strip
- ☐ Constructed Wetland
- ☐ Wet Pond
- ☐ Dry Extended Detention Basin
- ☐ Water Quality Device
- ☐ Spray / Drip Irrigation
- ☐ Rain Barrel
- ☐ Protect / Utilize Natural Flow Pathways (on-site)
- ☐ Disconnection of Impervious / Roof Area
- ☐ Pervious Pavement with Infiltration Bed
- ☐ Infiltration Basin
- ☐ Infiltration Bed
- ☐ Infiltration Trench
- ☐ Soil Amendment
- ☐ Dry Well / Seepage Pit
- ☐ Infiltration Berm / Retentive Grading
- ☐ Protect Sensitive / Special Value Features
- ☐ Street Sweeping
- ☐ Green Roof

☐ Approved Alternative: _____

Explain how the PCSM BMP(s) will individually or collectively manage the net change in stormwater volume, rate, and quality for storm events up to and including the 2-year/24-hour storm after earth disturbance activities.

CERTIFICATION

I certify under penalty of law and subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities) that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Fred Ferraro	VP of Development
Applicant Name (type or print legibly)	**Official Title**
Fred Ferraro	10/13/2022
Applicant Signature	**Date Signed**