COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

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

Applicant: **I80-115 C-1 Site, LLC.** Project Site Name: **I80-115 C-1 Site, LLC.**

Surface Water Name: **Mud Pond Run** Surface Water Use: **EV**

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.

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.

Alternative siting, in regard to location, configuration and location of discharge was considered, no alternative that would eliminate the change in stormwater was identified other than not doing the project. Not doing the project is not cost effective, The disturbed areas of the project are not in proximity to a stream, riparian buffers were not an option. A detailed sequence of construction will be implemented than limits disturbed area, extent and duration of disturbance.

☒ **Antidegradation Best 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
- ☐ 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 Buffer (< 150 ft) ☐ Riparian Forest Buffer (< 150 ft)

☒ Approved Alternative: **150' 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.

As specified by the site specific sequence of construction, ABACT BMPs are proposed during construction. During construction the vegetated swales and sediment basin adaquatly manages the rate and volume of stormwater discharging the site. The combination of ABACT E&S BMP used as specified in the PA E&S manual

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.

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.

Alternative siting, in regard to location, configuration and location of discharge was considered, no alternative that would eliminate the change in stormwater was identified other than not doing the project. Not doing the project is not cost effective, The disturbed areas of the project are not in proximity to a stream, riparian buffers were not an option. Water reuse was deemed not cost effective for the properties proposed use. The proposed project does provide non-structure BMPs where feasible.

☒ **Antidegradation Best 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
☐ 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

☐ Spray / Drip Irrigation
☐ Rain Barrel
☐ Protect / Utilize Natural Flow Pathways (on-site)
☐ 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.

A comprehensive PCSM plan has been designed for this project that utilizes a treatment train of BMPs to collectively manage the net change in stormwater volume, rate and water quality. The non-discharge alternative of infiltration provides the bulk of stormwater management by infiltrating the net increase in stormwater volume and infiltrating enough of the pollutant loaded run-off as to provide improved water qaulity over the existing condition. The use of an additional non-structural BMPs provides supplemental management of the stormwater.

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.

David W. Moyer
Applicant Name (type or print legibly)

Applicant Signature

Authorized Member/Officer
Official Title

7/26/2022
Date Signed