

DISCHARGES OF STORMWATER ASSOCIATED WITH CONSTRUCTION ACTIVITIES ANTIDEGRADATION ANALYSIS MODULE 3

Applicant: Homer City Generation, L.P. Project Site Name: HCPP Pipeline
 Surface Water Name: Refer to Section 5.0 of E&S Narrative Surface Water Use: CWF, TSF

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:

- | | |
|--|---|
| <input type="checkbox"/> Alternative Siting: Location | <input checked="" type="checkbox"/> Limiting Extent & Duration of Disturbance |
| <input type="checkbox"/> Alternative Siting: Configuration | <input type="checkbox"/> Riparian Buffer (150 ft min.) |
| <input type="checkbox"/> Alternative Siting: Location of Discharge | <input type="checkbox"/> Riparian Forest Buffer (150 ft min.) |
| <input type="checkbox"/> Other: _____ | <input checked="" type="checkbox"/> 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.

The E&S BMPs have been designed to manage sediment-laden runoff for storm events up to and including the 2 year/24-hour storm event. Disturbed areas will be stabilized as soon as practicable to manage stormwater runoff and minimize the potential for erosion.

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.

Limited Disturbed Area – The amount of land disturbed within the LOD will be minimized to the extent practicable at all times. Land will only be disturbed at the rate necessary to progress installation of the proposed pipelines, waterline, and associated facilities.

Immediate Stabilization – All disturbed area will be restored to meadow–good condition, agricultural use, or a stable gravel cover as soon as practicable following construction.

Other - Revegetation – All disturbed areas will be restored to meadow-good condition as soon as practicable following construction, unless otherwise noted on the plan drawings.

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:

- | | |
|--|---|
| <input type="checkbox"/> Rock Construction Entrance with Wash Rack | <input checked="" type="checkbox"/> Rock Construction Entrance with Street Sweeping |
| <input type="checkbox"/> Wheel Wash | <input checked="" type="checkbox"/> Pumped Water Filter Bag with Compost Sock Ring |
| <input type="checkbox"/> Pumped Water Filter Bag with Sump Pit | <input checked="" type="checkbox"/> Compost Filter Sock |
| <input type="checkbox"/> Compost Filter Berm (HQ Only) | <input type="checkbox"/> Weighted Sediment Filter Tube (HQ Only) |
| <input type="checkbox"/> Silt Fence with Vegetative Filter Strip | <input type="checkbox"/> Super Silt Fence with Vegetative Filter Strip |
| <input type="checkbox"/> Wood Chip Filter Berm (HQ Only) | <input type="checkbox"/> Vegetative Filter Strip (HQ Only) |
| <input type="checkbox"/> Sediment Basin with Perforated Riser (HQ Only) | <input type="checkbox"/> Sediment Basin with Skimmer |
| <input type="checkbox"/> Stone Inlet Protection with Compost Layer (HQ Only) | <input type="checkbox"/> Compost Filter Sock Sediment Trap |
| <input type="checkbox"/> Embankment Sediment Trap with Compost Layer (HQ Only) | <input type="checkbox"/> Embankment Sediment Trap with Compost Sock |

- | | |
|---|---|
| <input type="checkbox"/> Sediment Trap with Perforated Riser (HQ Only) | <input type="checkbox"/> Sediment Trap with Skimmer |
| <input checked="" type="checkbox"/> Erosion Control Blankets within 50 ft of Surface Waters | <input checked="" type="checkbox"/> Immediate Stabilization |
| <input type="checkbox"/> Flocculant with PAMs | <input type="checkbox"/> Vegetative Conveyance |
| <input type="checkbox"/> Riparian Buffer (< 150 ft) | <input type="checkbox"/> Riparian Forest Buffer (< 150 ft) |

Approved Alternative: Rock Construction Entrance (Alternate for Siltation Impaired Watersheds); Multi-Layer Geotextile Filter Fence

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.

ABACT BMPs – Multi-layer geotextile filter fence will be utilized upslope of special protection waters during construction to minimize the transport of sediment pollution to the special protection waters. Rock construction entrances upslope of special protection waters will be extended and additional 50 feet (100 feet total) where street sweeping will be conducted or extended to a total length of 150 feet with 50 feet of rolled PennDOT 2RC at the entrance, where street sweeping will not be conducted (i.e., along an existing access road). Waterbars and pumped water filter bags within the special protection watersheds will include a compost filter sock at the discharge outlets. Disturbed areas will be immediately stabilized with vegetative stabilization, following reaching final grades.

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 SCMs that will be used to achieve the non-discharge alternative:

- | | |
|--|--|
| <input type="checkbox"/> Alternative Siting: Location | <input type="checkbox"/> Low Impact Development |
| <input type="checkbox"/> Alternative Siting: Configuration | <input type="checkbox"/> Riparian Buffer (150-ft. min.) |
| <input type="checkbox"/> Alternative Siting: Location of Discharge | <input type="checkbox"/> Riparian Forest Buffer (150-ft. min.) |
| <input type="checkbox"/> Infiltration | <input type="checkbox"/> Water Reuse |
| <input checked="" type="checkbox"/> Other: <u>Revegetation</u> | |

Explain how the PCSM SCM(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.

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 PCSM SCMs that will be utilized to achieve the ABACT standard:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Rain Garden (with Infiltration) | <input type="checkbox"/> Disconnection of Impervious / Roof Area |
| <input type="checkbox"/> Rain Garden (without Infiltration) | <input type="checkbox"/> Pervious Pavement with Infiltration Bed |
| <input type="checkbox"/> Constructed Filter | <input type="checkbox"/> Infiltration Basin |
| <input type="checkbox"/> Vegetated Swale | <input type="checkbox"/> Infiltration Bed |
| <input type="checkbox"/> Vegetated Filter Strip | <input type="checkbox"/> Infiltration Trench |

- | | |
|--|---|
| <input type="checkbox"/> Constructed Wetland | <input type="checkbox"/> Soil Amendment |
| <input type="checkbox"/> Wet Pond | <input type="checkbox"/> Dry Well / Seepage Pit |
| <input type="checkbox"/> Dry Extended Detention Basin | <input type="checkbox"/> Infiltration Berm / Retentive Grading |
| <input type="checkbox"/> Water Quality Device | <input type="checkbox"/> Protect Sensitive / Special Value Features |
| <input type="checkbox"/> Spray / Drip Irrigation | <input type="checkbox"/> Street Sweeping |
| <input type="checkbox"/> Rain Barrel | <input type="checkbox"/> Green Roof |
| <input type="checkbox"/> Protect / Utilize Natural Flow Pathways (on-site) | |

Approved Alternative: _____

Explain how the PCSM SCM(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.

Refer to Section 6.0 of the PCSM/SR Narrative.

CERTIFICATION

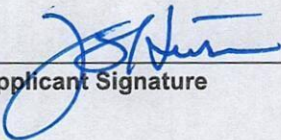
I certify under penalty of law and subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities) that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered 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.

Joel S. Heiser

Applicant Name (type or print legibly)

General Counsel & Secretary

Official Title



Applicant Signature

September 24, 2025

Date Signed