

## Drake, Dana

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**From:** Gilstrap, Sarah <sgilstrap@burnsmcd.com>  
**Sent:** Thursday, June 11, 2020 12:49 PM  
**To:** Sommer, James; Matt Golden; Tom Ulrich  
**Cc:** Owens, Robert (Energy); Barton, Tim; Graves, Tom; rjb1900@aol.com  
**Subject:** [External] PAD630034 Beech Hollow Generation Site 5th TDL Response

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Jim –

The E&S and PCSM Plan revisions to the Ch. 102 NPDES permit application for the Beech Hollow generation site (PAD630034) were mailed to your office today. I will also send you PDF copies of each updated item via our file transfer system. Please see the bolded deficiency responses below.

1. Chapter 102.6(a)(1): Pertaining to the 4<sup>th</sup> TDL, Comment # 1, the MS4 approval remains in review with PennDOT. A letter from the MS4 owner must be provided within the permit application which states that the owner accepts the increased 2-year/24-hour storm water volume into their MS4 system. The letter should state the quantified volume the MS4 system is expected to manage. A positive permit decision cannot be made until the Department receives this letter.

**Status: This comment dates back to the 1<sup>st</sup> TDL sent on 5/2/19. An MS4 approval letter has not been received, to date.**

**An email from Jim Sommers to Ronnie Williams (Burns & McDonnell Engineering Co.), on May 28, 2020, states that the MS4 approval from PennDOT has been resolved.**

From the review of the submitted revisions, please address and revise if necessary, the following:

1. Chapter 102.8(c): Please revise all E&S and PCSM Plan Sheets to show the three wetlands within the construction parking lot/staging area to be protected. The previous notes and call outs that indicated these were protected on the PCSM Plan Sheets were removed, and are now labeled to be restored following construction, which is misleading. These wetlands are not to be impacted, and must be shown on all plan sheets as such. They state see Note 1 on plan sheets which refers to contours.

**Please see updated E&S and PCSM Drawings, which say “Wetlands to be protected with orange construction fencing during construction.”**

2. Chapter 102.8(c): Please revise all proposed drawings to show the now five transmission towers. Previously, it was indicated that there were only four, and that it would be included in permit PAD630045. From the latest response, it was indicated there are now five, and the tower foundations will be constructed during the generation site work. The response indicated this construction sequence indicating this was provided on a revised Plan Sheet CS309, however, this plan sheet was not seen in the response. Please provide and ensure all drawings show the five towers, and any necessary grading.

**Additional labels have been added for the transmission line towers on E&S Drawing CS207 and PCSM Drawing CS305. Additionally, E&S Drawing CS207 shows the five transmission line towers with necessary grading.**

3. Chapter 102.8(g)(2): From previous submissions, it was indicated that water quality filter devices would be placed in all inlets on site, to assist in water quality control. Please add these to the PCSM Plan Sheets, PCSM Narrative, PCSM construction sequence, and PCSM details and maintenance procedures. As the receiving streams are impaired and have a TMDL for total suspended solids, it is critical to include these filter devices.

**Water quality filter devices are again included in the PCSM design, and updates are included throughout the PCSM Plan. Because the Project will implement two primary BMPs on Worksheet #10 for each POI, BMP 5.6.1 – Minimize Total Disturbed Area and BMP 5.9.1 - Street Sweeping/Vacuuming, we have satisfied the nitrate control requirements, and Worksheets #12 and #13 are not included to further describe water quality control.**

4. Chapter 102.8(c): Please explain or clarify where the projects outfall velocity calculations are located within this permit application, and provide the necessary outlet velocity control designs. The Plan Sheets (E&S and PCSM) do not appear to accurately show rip-rap aprons for the outfalls on-site? The detail provided on CS308 (PCSM Plans) and CS 213 (E&S Plans) are inconsistent, and shows two proposed rip-rap aprons for Outfalls 002 and 004. Please indicate on the drawings the rip-rap size and show these aprons. Indicate if Outfall 001 and 005 need rip-rap aprons for their outfalls as well. (Outfalls 002 and 005 should be noted that they are permitted under a different permit.)

**E&S Worksheet #20 and supporting velocity calculations are attached for review. Additionally, plan drawings have been updated to clarify riprap apron design at each NPDES outfall. Please note that Burns & McDonnell feels standard detail #9-3 is appropriate for Outlet 2 for the E&S Plan for construction. For the PCSM Plan, detail #9-2 was chosen for Outlet 2 and is in a different configuration to support the installation of the vegetative swale.**

5. Chapter 102.8(f): The revised PCSM narrative sheet 2-1 is misleading in that it states there will be 6.31 acres of impervious cover type, with the remaining 52.29 acres, being re-seeding and vegetated. This is inaccurate, as there are large areas that will have a gravel cover type in the proposed condition, as shown on the plans and in the calculations. Please revise this paragraph.

**The post-construction area to be covered with gravel surfacing has been added to page 2-1 of the PCSM narrative, and the post-construction area to be stabilized with native vegetation has been updated.**

6. Chapter 102.6(a)(1): The narrative revisions were submitted single sided. As the previous PCSM Narrative was submitted double-sided, the Department cannot replace the revised sheets, as the adjacent page would be lost. Please resend this material, and any revisions from this email, in the same manner in which the previous versions of the PCSM Narrative were provided, so that they can be replaced out after review.

**Copies of the PCSM narrative, in its entirety, have been submitted double-sided to eliminate further confusion.**

7. Chapter 102.8(f): The access road to the north basin is not included in the PCSM calculations and drainage areas and must be included. All plan sheets do not show this access road.

**PCSM Worksheets #3-5 have been updated for POI-1 to include the gravel access road to the North Basin. Also see updated calculations, E&S Drawing CS217, and PCSM Drawing CS315. Additionally, the tables in Section D of the NOI have been updated for POI-1 and are included for review.**

8. Chapter 102.4(c): Per the review of E&S Plans, it has been found that ABACT BMPs, as requested in the 1<sup>st</sup> TDL, are not entirely proposed. Please revise to provide the following:

- a. Rock construction entrance/rumble pad is not ABACT. Provide an ABACT construction entrance detail. All ABACT notes for the detail should be included.

**The rumble pad detail has been removed, and the rock construction entrance detail has been replaced with Detail #3-2 Rock Construction Entrance with Wash Rack. See updated E&S Drawings and Section 4.1.1 on page 4-1 of the E&S Plan narrative.**

- b. The dry basin outlet detail is not ABACT. The ABACT requirement should include a 6” layer of compost. All ABACT notes for the detail should be included.

**The dry basin outlet detail has been updated to satisfy ABACT requirements. Please see E&S Drawings CS212 and CS214.**

- c. The pump water filter bag is not ABACT unless ringed with a compost filter sock. All ABACT notes for the detail should be included.

**Detail #3-16 on E&S Drawing CS214 and Section 4.1.17 on page 4-6 of the E&S Plan narrative have been updated to include ABACT notes. The maintenance notes on E&S Drawing CS210 have also been updated.**

- d. Please add a note to the beginning of the construction sequence stating that the project “discharges to impaired waters, all BMPs should follow ABACT notes and details.”

**This note has been added to the beginning of the construction sequence on E&S Drawing CS209.**

Thank you.

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