November 8, 2019

Ms. Dana Drake
Pennsylvania Department of Environmental Protection
Southwest Regional Office
Waterways & Wetlands Program
400 Waterfront Drive
Pittsburgh, PA 15222

Re: Response to Third Technical Deficiency Letter for Permit No. PAD630034 for the Beech Hollow Energy Project

Dear Ms. Drake:

Burns & McDonnell Engineering Company, Inc., on behalf of Robinson Power Company, LLC, submits the enclosed and revised E&S Plan and PCSM Plan for the Beech Hollow Energy Project (Permit No. PAD630034) in response to the Third Technical Deficiency Letter received on September 24, 2019. Please see the below responses to each deficiency. Please contact me at (816) 363-7275 or sgilstrap@burnsmcd.com if you have any questions.

E&S COMMENTS:

1. **§102.4(b)(5)(ix): All earthwork required for slope stabilization area should be shown on the plans. Only final proposed grade is shown on the plans. What earthwork will be conducted in order to install the slope reinforcement?**

The earthwork required for slope stabilization along the southwest boundary of the power block has been added to the E&S Plan drawings. The earthwork will be completed in three phases, one phase for each row of stabilization piles. Each phase will be backfilled to original contours, and the slope will be re-seeded.

2. **§102.4(b)(5)(ix): Compost filter socks 60 & 61 at the slope reinforcement area should have the ends turned up as depicted with the other proposed socks on site.**

Both ends of compost filter socks 60 and 61 have been turned upslope on E&S Drawings CS205B, CS207, and CS215. Compost filter sock has been added in various areas, so these segments have been renumbered to 75 and 76.

3. **§102.4(b)(5(ix): The maximum slope length is exceeded for a 24” filter sock at CFS 60 & 61.**

The table on E&S Drawing CS207 has been updated for CFS 60 and 61 to be 32”. The table now matches E&S Worksheet 1 in Appendix C of the E&S Plan. Compost filter sock has been added in various areas, so these segments have been renumbered to 75 and 76.

4. **§102.4(b)(5(vii): Construction Sequence: Conveyance BMPs should be installed before bulk grading. The east swale to the south basin should be installed prior to pad grading in order to convey runoff to the south basin.**

The construction sequence on E&S Drawing CS209 has been modified so that the East swale is installed prior to rough grading the collector switchyard and the power block area.

5. **§102.4(b)(5(vii): It should be clearly noted in the construction sequence when to transition from the initial E&S plan phase to the final E&S plan phase.**

The construction sequence on E&S Drawing CS209 has been updated to indicate the transition from the initial E&S Plan phase to the final E&S Plan phase.

PCSM COMMENTS:

1. **§102.6(a)(1): The Department recently had an informal file review of all permit related material for the Beech Hollow Power Plant. It was determined after the informal file review that one PCSM Report Set is missing. Please provide an additional PCSM Report set in its entirety. The Department apologizes for this inconvenience and is looking into the matter.**

An additional copy of the PCSM Plan, in its entirety, is enclosed.

2. **§102.6(a)(1): Provide a status update on the MS4 approval letter from PennDOT which states they approve of the volume increase to their system.**

Burns & McDonnell is working closely with PennDOT to address some issues related to the design of the existing highway entrance off State Route 980. PennDOT will not review or approve the proposed stormwater drainage to the MS4 inlet until the highway entrance plans are deemed acceptable. Based on recent meetings with PennDOT, Burns & McDonnell believes the MS4 approval may be issued within 30 to 45 days.

3. **§102.6(a)(1): Please provide a new PCSM Report cover page with P.E. seal and certification as one was not provided which covers the most recent revisions.**

The enclosed copies of the PCSM Plan narrative include an updated certification page.

4. **§102.8(g): There is a small area within the limit of disturbance (shown on Sheet CS315 as well as earlier plan sheets) west of the power block area which is shown to not be within a drainage area or POI and thus not included in calculations for volume, rate and water quality requirements. Please address this area as stated in an earlier deficiency letter. This is part of the area that drains to the UNT to Little Raccoon Run which is the POI. Otherwise, this area would need to be a separate POI. This change in cover type for this area will need to be included in the rate calculations as it is not seen.**

Drawings have been updated to include disturbed area to collect to the south basin through POI-2. Calculations for POI-2 and tables have been updated accordingly.

5. **§102.6(a)(1): Worksheets #2-3 do not correspond with what is provided on Worksheets #4 and the plan sheets. (For example, POI-1 shows 10.69 acres in post development, of which 0.41 acres is stated as wetlands to be protected. There are 0 wetlands shown in POI-1. The protected areas must be called out on the plan sheets and protected from disturbance in order to be used for reduction of the management area.) Please revise Worksheets #2-3 in order to correspond to the submitted Worksheet #4s.**

Worksheets #2, 3, and 4 for POI-1 and POI-2 have been updated and are included in Appendix C of the PCSM Plan. The POI-3 worksheets required no change. The wetland originally included in POI-1 should have been included on the POI-2 worksheets. The protected wetland area included in Worksheet 2 and 3 has been removed from Worksheet 4, and drawings and calculations have been updated accordingly.

6. **§102.6(a)(1): The PCSM Report (volumes and rates) have been updated since the first submittal. As such, Pages 3.4-3.5 should be revised within the PCSM Report to reflect these revisions. Currently, what is claimed in the report is inconsistent with the rest of the application.**

The stormwater volumes and rates for each POI on page 3-5 of the PCSM Plan narrative have been updated for consistency with the remainder of the application.

7. **§102.8(f)(9): Please explain what the square boxes delineated on the plan sheets represent (Example EX002). These are not called out or given a delineation within the legend.**

The square boxes are transmission line tower foundations. These foundations have been removed from all drawings except for E&S Drawing CS207 and PCSM Drawing CS305. Access to the towers and E&S controls needed for construction have been added to E&S drawing CS207.

8. **§102.8(f)(8-9): Adding up the drainage areas shown within POI-2 on EX005 and EX006 totals 22.32 acres. You have claimed 25.12 acres within POI-2. Please revise. Please also explain what the area excluded from POI-2 on Sheet EX006 is. Where does this drain to?**

Please see revised plan drawings; Powerblock Area 1 (1s) was incorrect.

9. **§102.8(f)(9): For consistency with the E&S Plan, please show the People's Natural Gas Line and easement where it crosses within the limit of disturbance/NPDES boundary.**

PCSM Drawing CS303 has been added to the PCSM set to show the People's Natural Gas Line and easement.

10. **§102.8(f)(9): The purpose of a level spreader is to promote sheet flow. The current level spreader which is proposed is not easily seen on the plan drawing. Please provide its location. In addition, the level spreader should not lead to a channel as this would negate the value of the level spreader. Ensure that is flow will not create any structural issues for the adjacent dam.**

As suggested in the meeting on October 10, 2019, the level spreader has been moved farther down the slope to enable its construction parallel to the existing slope.

11. **§102.8(f)(9): Please revise the details as an impermeable liner is not called out on each detail which is misleading. The forebays should also include the impermeable liner. Explain why one of the liners is shown on top of the proposed rip-rap? The liner should be at the bottom of the basin overtopped with topsoil and vegetated.**

PCSM Drawing CS307 has been updated.

12. **§102.8(f)(9): The storm event elevations have been revised in the latest submittal. As such, please revise Plan Sheet CS310 to be consistent.**

PCSM Drawing CS310 has been revised to include the most recent storm event elevations.

13. **§102.8(f)(9): Please revise Plan Sheet CS307 as the latest revisions now show 2" orifices, instead of the previous 2.5" orifices. The one detail on CS307 still shows 2.5" orifices.**

PCSM Drawing CS307 has been updated to show 2" orifices.

14. **§102.8(f)(9): Revise Plan Sheet CS311 to show the spacing between the pipes as was performed in the previous submittal and the height dimensions. The encasement bottom elevation should also be shown. Currently, the detail states varies.**

PCSM Drawing CS311 has been revised, as requested.

Sincerely,

Sarah Gilstrap

Sarah Gilstrap, CPESC
Senior Environmental Scientist

cc: Vernon Wranosky, Burns & McDonnell
Tom Graves, Burns & McDonnell
Tim Barton, Burns & McDonnell
Robert Owens, Burns & McDonnell
Raymond Bologna, Robinson Power