

July 20, 2018

Douglas C. White  
214 Kirkbrae Road  
Kennett Square, PA 19348

Re: Technical Deficiency Letter  
Project Name: Douglas C White - Northridge – *Review I*  
NPDES File Number: PAC150079  
Municipality: East Marlborough Township, Chester County, PA  
Most Recent Plan Revision Date: 06/05/18  
Total Acres: 22.9  
Disturbed Acres: 19  
Receiving Watershed: East Branch Red Clay Creek  
Designation: TSF, MF

Dear Mr. White:

The Chester County Conservation District has reviewed the above reference application/NOI and has identified the following technical deficiencies. The Pennsylvania Erosion and Sediment Pollution Control Program Manual and the Pennsylvania Stormwater Best Management Practices Manual include information that will aid you in responding to some of the deficiencies listed below. The submitted Application/NOI has been found to be technically deficient, therefore **inadequate**. The deficiencies are based on applicable laws and regulations, and the guidance sets forth the DEP's established means of satisfying the applicable regulatory and statutory requirements .

The following additional information and/or corrections must be provided in order to rectify the technical deficiencies of the application/NOI:

### **Erosion and Sedimentation Control Comments**

1. Erosion control blanketing should be shown on all proposed conveyances, please address. §102.11(a)(1)
2. Inlet protection should not be proposed on inlets draining to sediment basins, please address. §102.11(a)(1)



- 3.** Please clarify the intent of the Proposed Emergency Gate Valve and also how it is to be used, or not, during the E&SC phase. §102.11(a)(1)
- 4.** On-lot E&S controls should be provided on the E&S plan drawing, please address. §102.11(a)(1)
- 5.** RCE's should be shown (at least 1 per set of twins) on the E&SC plan drawings, please address. §102.11(a)(1)
- 6.** Due to the location of the permanent risers and the inflows to sediment basins 1 and 2, please demonstrate how the 2:1 required flow length to width ratio is achieved or add baffles to the plan view and plan detail sheet. §102.11(a)(1)
- 7.** Clean out stakes with proposed clean out elevations should be provided on the E&SC plan drawings. §102.11(a)(1)
- 8.** Step 5 of the sequence of construction indicates that topsoil should be stripped from areas that are to be disturbed which is prior to the installation of the projects sediment basins. The projects sediment basins should be installed and functioning prior to disturbing the whole project site, please address. If borrow areas are needed for the construction of the sediment basins then they should be identified on the E&SC plans. §102.11(a)(1)
- 9.** The sequence of construction should indicate when the construction of houses may commence (after the roads are stabilized), please address. §102.11(a)(1)
- 10.** The sequence of construction and the E&SC plan drawings should address how sediment laden water will reach the proposed sediment basins prior to all storm piping having been installed, please address. §102.11(a)(1)
- 11.** The sequence of construction should state that all storm piping draining to the infiltration basins should be flushed of accumulated sediment prior to conversion, please address. §102.11(a)(1)
- 12.** Perimeter E&S controls, or a berm and slope pipe, are warranted between the proposed Devon Lane earth disturbance and the steep slopes that are outside of the limit of disturbance, please address. §102.11(a)(1)
- 13.** E&S controls are warranted below the proposed sanitary sewer work adjacent to Walnut Road, please address. §102.11(a)(1)
- 14.** The drainage area to the 24" compost filter sock proposed down slope of units 45 and 46 is approximately 4.5 acres (excluding the sediment basin drainage areas) of earth disturbance. CCCD strongly recommends adding an excavated sump to the E&SC plan drawings to increase storage capacity of the filter sock and allowing it to function more

like a filter sock sediment trap and thus better protecting the headwater condition directly downslope of the filter sock from sedimentation, please address. §102.11(a)(1)

- 15.** The discharge from sediment basin 1 is tributary to sediment basin 2. Sediment basin 2 should be sized to account for the entire drainage area to both sediment basins or a means to divert (e.g. diversion sock, berm, swale, or slope pipe) should be provided at EW3 to direct flows downslope of sediment basin 2. §102.11(a)(1)
- 16.** Associated with E&S comment 14, the discharges from sediment basins 1 and 2 (22 acre total drainage area) should not be tributary to the filter sock installed below units 45 and 46. A means to divert flows around the filter sock should be provided. §102.11(a)(1)
- 17.** A rock filter should be provided at the end of swale 3/behind units 29 & 30, please address. §102.11(a)(1)

### **Comments as per the PA DEP NPDES Post Construction Stormwater Requirements**

- 1.** The proposed emergency gate valve should be reflected in the Long Term O&M Notes and Schedule as well as in the basin profile provided on sheet SM-2. §102.11(a)(2)
- 2.** Landscape restoration is proposed as a Worksheet 10 BMP and should be included in the sequence of construction (as a critical stage), should be listed on table D4 in the NOI, and should be listed as a critical stage in the NOI, please address. §102.11(a)(2)
- 3.** Due to the low orifice invert elevation, a means for dewatering infiltration basin 1 during basin establishment should be considered and added to the E&S/PCSM plans, please address. §102.11(a)(2)
- 4.** Please clarify what the proposed seeding/planting schedule is for infiltration basins 1 and 2. If this information is contained in the landscaping plan it should be cross referenced on the PCSM plan and also provided. §102.11(a)(2)
- 5.** Please clarify how the existing impervious was accounted for on worksheet 4 (e.g. reconstruction or 20% meadow). §102.8(g)(2)(ii)
- 6.** Hydrographs 4 and 6 indicate a 2 year volume tributary to infiltration basins 1 and 2 at 47,268cf and 30,581cf respectively. Chart 5b indicates a 2 year volume tributary to infiltration basins 1 and 2 at 60,457cf and 40,581cf respectively. The maximum volume credit taken for volume reduction permanently removed (infiltrated) cannot exceed what drains to each facility during the 2-year design storm. Please address the discrepancy and if necessary update volume reduction numbers throughout the permit application and supporting documents. §102.11(a)(2)

7. Please verify that 90% of the disturbed area drains through a PCSM BMP. If the project is shy of the 90%, consideration should be given to including the headwater area of the project site in the landscape restoration area and providing plantings in the area that would bolster the existing riparian buffer. §102.11(a)(2)

Pursuant to 25 Pa. Code §102.6 (c) of DEP's rules and regulations, you must submit a response fully addressing each of the significant technical deficiencies set forth above. Please note that this information must be received within sixty (60) calendar days from the date of this letter or DEP may consider the application to be withdrawn by the applicant.

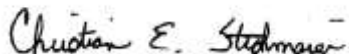
You may request a time extension in writing before the end of the 60 day time period to respond to deficiencies beyond the sixty (60) calendar days. Requests for time extensions will be received by the CCCD for consideration. You will be notified in writing of the decision either to grant or deny, including a specific due date to respond if the extension is granted. Time extensions shall be in accordance with 25 Pa. Code § 102.6(c).

Please submit 2 E & S plans and 2 copies of the revised PCSM plan (one set of the revisions should be **highlighted**) to the Chester County Conservation District. If a **complete transmittal letter** is not provided with your resubmission, your project may be returned. Please be advised that the District may have additional comments with the revisions. **Additional Note: a second technical review fee equal to 25% of the original E&SPC base fee will be due with you next submission if your project has an application date of October 1, 2014 or after.**

If you have any questions regarding the identified deficiencies or wish to schedule a meeting, please call the **Chester County Conservation District at the number below**. The meeting must be scheduled within the 60 calendar days allotted for your reply, unless otherwise extended by the Conservation District.

**Questions regarding this matter can be directed to:**  
**Gordon Roscovich**  
**Resource Conservationist**  
**Chester County Conservation District**  
**(610) 925-4920 x 106**

Sincerely,



Christian E. Strohmaier, Director  
Chester County Conservation District

cc: Regester Associates, Inc. (email)  
East Marlborough Township (email)  
Conservation District  
Project Folder