



ENCINA

July 12, 2023

Mr. Andrew Ross
PA Department of Environmental Protection
Waterways and Wetlands
North Central Regional Office
Via Email: andross@pa.gov

RE: Point Township Circular Manufacturing Facility
NPDES Permit Application No. PAC490109
("Permit Application")

Dear Mr. Ross,

We are in receipt of the Second Technical Deficiency letter, dated July 6, 2023, (the "Letter") relating to Encina's Permit Application. As you know, the Letter contains 19 different items to be addressed by Encina and our various consultants. Nearly half of these are new comments which were not included in the first Technical Deficiency Letter.

Our goal and intention is to address all the comments fully and to the satisfaction of PADEP. Given the breadth and depth of the requests, we will need to dedicate resources currently focused on other tasks. In addition, we are now experiencing a summer slow-down for our staff as well as the various consultancies involved, which has a rippling effect on timing of work getting done. Lastly, we anticipate that once we have resources re-dedicated to these questions, they will likely need to schedule a meeting with the reviewer to seek additional clarification about some of the requests and the ways in which we need to re-design existing plans, all of which will also require additional time.

The Letter indicates that there is a 60 calendar-day window in which Encina needs to provide responses (i.e. by September 4, 2023). As a result of the various issues described above, we request an extension of the response window by an additional 60 calendar-day period (i.e. through November 3, 2023). This provides enough time past the July/August window to be fully and adequately responsive.

Would you please advise if this is acceptable? We thank you in advance for your consideration.

Sincerely,

Sheida R. Sahandy
Chief Sustainability Officer and Counsel
Encina Development Group, LLC