

Tuesday, April 21st, 2020



CONDITIONAL POST-CONSTRUCTION STORMWATER MANAGEMENT PLAN APPROVAL

*Not valid unless signed by Owner and PWD. See page 3.

Robert L. Becker
Relteva, LLC
1515 Des Peres Road
St. Louis, MO 63131

RE: **Red Lion Phase 1**
PWD Tracking #: FY20-REDL-5874-01; NPDES Permit #: PAD510058

Project Description: The Red Lion Phase 1 redevelopment project proposes demolition and rough grading at 1 Red Lion Road, Philadelphia, PA 19115. The site is located in a separate sewer area of the Pennypack Creek Watershed, Flood Management District B. The total earth disturbance proposed is approximately 4,631,391 square feet. This project meets the eligibility criteria for the expedited Disconnection Green Review. A waiver from the infiltration requirement is requested due to on-site contamination.

Philadelphia Water Department (PWD) Stormwater Plan Review has finished reviewing the development site plan set associated with the Red Lion Phase 1 project, received on April 7th, 2020 and April 9th, 2020. A table of documents approved as part of this submittal follows:

Item	Description	Dated
01	Phase I Erosion & Sediment Control Plan	4/6/2020
11	Phase I Environmental Plan	4/6/2020
21	Phase I Stormwater Management Plan	3/20/2020
22	Existing Conditions Plan	4/6/2020
23	Erosion & Sediment Control Notes	4/6/2020
24	Erosion & Sediment Control Details	4/6/2020

Based upon a technical review of the Post-Construction Stormwater Management Plan (PCSMP) submission, the project cannot be technically approved at this time. Some areas of the design require additional information to be submitted. In addition, the associated plans and calculations may need to be revised and resubmitted in order for the project to comply with the applicable Stormwater Regulations. Provided that the applicant acknowledges the conditions set forth in this letter via signature, PWD will be able to support a Conditional Approval for the project.

The condition of approval noted below must be met upon the completion of the PCSMP Review Phase for Phase 2 of the Red Lion project (PWD Tracking #: FY20-REDL-5914-01) or within seven (7) months of the date of issuance of this Phase 1 Conditional PCSMP Approval if Relteva, LLC is no longer actively seeking PCSMP Approval for Phase 2 at that time, whichever occurs first.

- 1. An Operations and Maintenance (O&M) Agreement will be issued, which must be signed and returned along with payment of any applicable O&M Recording Fee.**

By signing below, Relteva, LLC accepts the financial and timing risks associated with the incomplete technical review.

This correspondence applies to the PWD Stormwater Regulations only. See the Building Permit Sign-off Checklist for more information on the requirements to obtain PWD's endorsement on the Building Permit Application. If a Building Permit is not required for this project, then the Checklist should be treated as a series of pre-requisite approvals that must be obtained from PWD before construction may commence.

This Conditional Post-Construction Stormwater Management Plan Approval will expire two (2) years from the date of issuance unless a valid Building Permit is in place.

During construction, the selected contractor is expected to follow the PCSMP approved by PWD. No change or deviation from the approved PCSMP is permitted without prior approval from PWD. Upon issuance of this letter, PWD inspectors are notified. PWD must be notified at least three working days prior to the start of construction activities.

Upon completion of the project, Record Drawings must be provided to PWD.

The applicant is responsible for obtaining any required federal, state, and local permits outside of this review.

If Relteva, LLC agrees to the conditions above, return the executed, original letter (not a photocopy) to the PWD technical reviewer noted below.

If you have any questions, please contact PWD at the contact information provided below.

Regards,

Robert R. Ealer, PE
Stormwater Plan Review
Phone: (215) 685-6387
Email: Robert.Ealer@phila.gov

Alan Fody, PE
Manager, Stormwater Plan Review
Phone: (215) 686-9718
Email: Alan.Fody@phila.gov

Victoria Lenoci, LEED Green Associate
Manager, Private Development Services
Phone: (215) 685-6266
Email: Victoria.Lenoci@phila.gov

Approved and Agreed:

Relteva, LLC

By: *M. Mohl*

Title: *Manager*

Date: *4-21-2020*

Philadelphia Water Department

By: _____

Title: _____

Date: _____

- Cc:
- B. Mohl
 - E. Smith
 - E. Ponert
 - J. Abraham
 - J. Duncan (PA DEP)
 - S. Judge (Blue Rock Construction)
 - R. O'Neill (Watchdog Real Estate)
 - C. Brown (Bohler Engineering)
 - A. Gandhi (Bohler Engineering)
 - M. Roth (Bohler Engineering)

THIS IS NOT A PERMIT

Tuesday, April 21st, 2020



POST-CONSTRUCTION STORMWATER MANAGEMENT PLAN REVIEW

Robert L. Becker
Relteva, LLC
1515 Des Peres Road
St. Louis, MO 63131

RE: **Red Lion Phase 1**
PWD Tracking #: FY20-REDL-5874-01; NPDES Permit #: PAD510058

Project Description: The Red Lion Phase 1 redevelopment project proposes demolition and rough grading at 1 Red Lion Road, Philadelphia, PA 19115. The site is located in a separate sewer area of the Pennypack Creek Watershed, Flood Management District B. The total earth disturbance proposed is approximately 4,631,391 square feet. This project meets the eligibility criteria for the expedited Disconnection Green Review. A waiver from the infiltration requirement is requested due to on-site contamination.

Philadelphia Water Department (PWD) Stormwater Plan Review has finished reviewing the development site plan set associated with the Red Lion Phase 1 project, received on April 7th, 2020 and April 9th, 2020. A table of documents reviewed as part of this submittal follows:

Item	Description	Dated
Worksheet	Online Technical Worksheet	4/7/2020
-----	Legal Description of Property	-----
Report	Stormwater Management Calculations	3/10/2020
Report	Phase II Erosion & Sediment Pollution Control Narrative	1/7/2020
Report	Wetland Delineation Road	10/31/2019
Report	Soil Management Plan	1/2020
01	Phase I Erosion & Sediment Control Plan	4/6/2020
11	Phase I Environmental Plan	4/6/2020
21	Phase I Stormwater Management Plan	3/20/2020
22	Existing Conditions Plan	4/6/2020
23	Erosion & Sediment Control Notes	4/6/2020
24	Erosion & Sediment Control Details	4/6/2020

Applicable Stormwater Regulations:

The project is subject to the Post-Construction Stormwater Management (PCSM) Requirements set forth under the PWD Stormwater Regulations effective as of 1/1/2006. Under the Stormwater Regulations, the following PCSM Requirements apply to the project:

- **Water Quality:** The first 1.5" of runoff from Directly Connected Impervious Area (DCIA) within the limits of earth disturbance will need to meet the Water Quality infiltration/treatment component of the PCSM Requirements of the PWD Stormwater Regulations.
- **Channel Protection:** Exempt. The project is a redevelopment project that reduces impervious area within the limits of earth disturbance (excluding public right-of-way) by at least 20%, based on a comparison of predevelopment impervious area to post-development DCIA.
- **Flood Control:** Exempt. The project is a redevelopment project that reduces impervious area within the limits of earth disturbance (excluding public right-of-way) by at least 20%, based on a comparison of predevelopment impervious area to post-development DCIA.

The following comments are made as a result of reviewing the Post-Construction Stormwater Management Plan (PCSMP) submitted to PWD for the proposed development project. The comments have been divided into six categories pertaining to comment type.

PCSM Requirements Compliance and Design Comments:

This category contains comments pertaining to key stormwater management system design issues and regulatory compliance. For more information on the PCSM Requirements, including applicability criteria, please refer to Section 1.2, Stormwater Regulations, of the PWD Stormwater Management Guidance Manual (Manual), Version 3.1.

1. **Addressed (3/25/2020):** A NPDES Permit from the PA DEP is required since the earth disturbance for this project exceeds one acre. PWD requires proof of NPDES application to PA DEP. This can be in the form of a copy of the permit application, application receipt, or notification letter from PA DEP.

***Bohler Engineering Response (3/30/2020):** A NPDES Application has been filed with the PADEP. A copy of the response letter submitted as part of the Technical Resubmission is included with this resubmission.*

2. **Addressed (3/25/2020):** 95% or more of the 7,113 sf of post-construction impervious area within the project's limit of disturbance (LOD) must be disconnected in accordance with Section 3.2.3 of the Manual. The submitted Online Technical Worksheet claims that all 7,113 sf is disconnected via pavement disconnection, however the plan doesn't indicate any proposed pavement disconnection. Please revise the plans to label all pavement disconnection area(s). Clearly label and show impervious drainage area and the length of overland flow across grass. Refer to Section 3.4.1 of the Manual for guidance.

***Bohler Engineering Response (3/30/2020):** The LOD has been revised to exclude the 7,113 SF of impervious area associated with the portion of the existing driveway to remain off of Sandmeyer Lane.*

3. **Addressed (3/25/2020):** Please provide an Existing Conditions Plan. Ensure that it meets all of the specific requirements for Existing Conditions Plans listed in Appendix E, Table E-2 of the Manual. Also

ensure that it includes notes relating to utility capping/plugging and demolition and hatching of all existing impervious areas within the project's LOD.

Bohler Engineering Response (3/30/2020): An Existing Conditions Plan is included with this resubmission.

PWD Response (4/3/2020): Same comment. Revise sheet 22 to hatch all existing impervious areas within the project's LOD. Also, please revise the LOD areas note leader on sheet 22 to list only the project's pervious and impervious area totals from its pre-development condition. Ensure that the areas are consistent with the "Predevelopment Area Summary" areas provided on the Online Technical Worksheet.

Bohler Engineering Response (4/7/2020): Project complies. An existing impervious hatch has been added to the plan and the legend on sheet 22. The LOD call out on sheet 22 has been revised to represent the predevelopment condition and is consistent with the Online Technical Worksheet.

Computational Errors:

This category contains comments pertaining to errors identified in the calculations and methodology. For more information on acceptable methods of calculation, please refer to Section 3.4.3, Calculation Methods and Design Tools, of the Manual, Version 3.1.

1. There are no comments at this time.

Submittal Inconsistencies:

This category contains comments pertaining to inconsistencies identified within the submission. Please note that additional inconsistencies may be present in the submission. The design engineer is strongly encouraged to perform a quality assurance/quality control analysis prior to resubmission.

1. There are no comments at this time.

Erosion and Sediment Control Comments:

This category contains comments pertaining to the design and implementation of the Erosion and Sediment Control (E&S) Plan. All E&S Plans must be in compliance with the Pennsylvania Department of Environmental Protection (PA DEP) Erosion and Sediment Pollution Control Program Manual. For more information on E&S Plan requirements, please refer to Section 2.3.1, Development Compliance Review Path, of the Manual, Version 3.1.

Please note that the PA DEP will also administer a review of the E&S Plan and calculations.

1. **Addressed (3/25/2020):** Please revise sheet 01 to note the total area encompassed by the LOD. Ensure that the area is consistent with the area provided on the Online Technical Worksheet.

Bohler Engineering Response (3/30/2020): A note has been added to Sheet 01 listing the total disturbed area.

2. **Addressed (3/25/2020):** Please revise the plans to indicate that some objects of considerable mass (i.e. concrete blocks, sand bags, etc.) must be used immediately downslope of compost socks placed on paved surfaces (at the same intervals as recommended by the sock manufacturer for stakes) in order to help hold them in place.

Bohler Engineering Response (3/30/2020): A note has been added to Sheet 01 speaking to adding objects of mass downslope of filter socks when placed on paved surfaces.

3. **Addressed (3/25/2020):** Please revise sheet 03 to include all applicable standard sequence of construction notes listed in Appendix E, Table E-6 of the Manual.

Bohler Engineering Response (3/30/2020): The E&S Notes Sheet, sheet 23, has been revised to include the applicable notes from Appendix E, Table E-6.

PWD Response (4/3/2020): Please revise the "PWD – Standard Sequence of Construction Notes" on sheet 23 to remove notes #2 and #3, as there are no SMPs proposed during this phase of construction.

Bohler Engineering Response (4/7/2020): Project complies. Notes #2 and #3 have been removed from the PWD-Standard Sequence of Construction Notes and the notes have been renumbered on sheet 23.

4. **Addressed (4/3/2020):** Please revise sheet 01 to propose compost filter sock that surrounds each proposed soil stockpile area.

Bohler Engineering Response (4/7/2020): Project complies. The previously submitted plans proposed filter socks at stockpile perimeters and matting as needed. These stock piles are not typical in that that dirt will not be moved around the site after their placement. The western stockpile will be utilized as a permanent berm and the northeastern stockpile material will not be moved. As discussed with the reviewer, this is acceptable to address this comment.

General Submittal Comments:

This category contains comments which pertain to the submission, however do not correctly fit into the other categories specified within this letter.

1. **Addressed (3/25/2020):** All plans, reports, and calculations must be signed and sealed by a Professional Engineer licensed in the Commonwealth of Pennsylvania. Please provide on each plan sheet a signature and seal from a PA Professional Engineer.

Bohler Engineering Response (3/30/2020): All reports and calculations have been electronically signed and sealed by a PE licensed in PA.

PWD Response (4/3/2020): Same comment. Please provide on the cover sheet of the “Stormwater Management Calculations” PCSM Report an electronic signature and seal from a PA Professional Engineer.

Bohler Engineering Response (4/7/2020): Project complies. An electronic signature and seal has been added to the PCSM report cover.

Operations and Maintenance Comments:

This category contains comments pertaining to the project’s Operations and Maintenance (O&M) Agreement. The O&M Agreement will be prepared when the design is completed. For more information on O&M Agreements, please refer to Section 6.1.2, Operations and Maintenance Agreements, of the Manual, Version 3.1.

1. **Addressed (3/25/2020):** Please revise the “OPA Info” under the “Operation and Maintenance Agreement Information” section of the Online Technical Worksheet to list the correct property address (1 Red Lion Road).

Bohler Engineering Response (3/30/2020): The OPA info has been revised on the online technical worksheet.

Summary of Stormwater Plan Review Fees:

Post-construction stormwater management plan reviews performed as of November 1, 2008 and forward are subject to the Stormwater Plan Review Fees. A summary of the PCSMP Hourly Review Fees for this project is provided below.

PWD PCSMP Hourly Review Fee	Review Time (hr)	Rate (\$/hr)	Sub-total
PCSMP Review #1 Date Received: 1/10/2020 & 1/19/2020	8.5	\$150	\$1,275.00
PCSMP Review #2 Date Received: 3/30/2020	5	\$150	\$750.00
PCSMP Review #3 Date Received: 4/1/2020 & 4/9/2020	5	\$150	\$750.00
Total (Paid)	18.5	\$150	\$2,775.00

Upon completion of the project, the as-built design must be provided to PWD in the form of a Record Drawing. Operations and Maintenance Agreements and plans must be updated to reflect as-built conditions, signed by PWD, and filed with the Office of Recorder of Deeds. Filing of the final agreement must occur prior to issuance of the Certificate of Occupancy.

If you have any further questions, please contact PWD with the information provided below.

Regards,

Robert R. Ealer, PE
Stormwater Plan Review
Phone: (215) 685-6387
Email: Robert.Ealer@phila.gov

Alan Fody, PE
Manager, Stormwater Plan Review
Phone: (215) 686-9718
Email: Alan.Fody@phila.gov

Cc: *V. Lenoci*
B. Mohl
E. Smith
E. Ponert
J. Abraham
J. Duncan (PA DEP)
S. Judge (Blue Rock Construction)
R. O'Neill (Watchdog Real Estate)
C. Brown (Bohler Engineering)
A. Gandhi (Bohler Engineering)
M. Roth (Bohler Engineering)

THIS IS NOT A PERMIT