Northampton County Conservation District
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To:	Michael Sodl	**From:**	Jonathan Fox
Email:	msodl@vertekcm.net	**Pages:**	2
Phone:	610-837-1856	**Date:**	6/8/21
Re:	NPDES #PAD480132 A-1, 303 Demi Road Planned Industrial Park	**CC:**	Louis Pektor lpektor@ashleydevelopment.com

☑ **Urgent** ☐ **For Review** ☑ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

● **Comments:** Per our conversation on June 8, 2021 concerning the NPDES Permit Completeness review of the above named project, the following outlines the comments discussed/addressed:

1. **Original Deficiency #2.b.v has not been adequately addressed in the resubmission:** "Section D.4 (Both POI) – VC and WQ are calculated differently from RC and may have more than one volume/acres listed; please clarify where applicable"
    a. **POI #1 does not appear to include separate calculations for volume of stormwater treated, i.e., 100-year storm for RC, and 2-year storm for VC/ WQ.**

2. **Original Deficiency #2.c.i has not been adequately addressed in the resubmission:** "The project search area should be greater than or equal to the entire site in question (i.e. total project area/ or 132.55 acres). Please provide a new PNDI search receipt and applicable resolution letters"
    a. **It appears the PNDI search area is 58.65 acres, which is less than the proposed 86.04 NPDES Permit area proposed.**

3. **Original Deficiency #2.c.ii has not been adequately addressed in the resubmission:** "An updated resolution letter for PA Department of Conservation and Natural Resources (DCNR) does not appear to have been provided. Please provide a copy of the resolution letter upon receipt. NOTE: NPDES permit cannot be issued until all conflicts are resolved"
    a. **PENDING**

4. **Original Deficiency #4.d.i.3 has not been adequately addressed in the resubmission:** "Worksheet 2 – Sensitive Resource Map should be provided; please revise"
    a. **It is correct that a Sensitive Resources Map is not required, provided the necessary information is included on E&S and PCSM Plan Drawings; however, the resources and areas could not be located on the plans referenced in the response letter.**

5. **Original Deficiency #4.d.i.13 has not been adequately addressed in the resubmission:** "Worksheet 10 (POI #2) – Worksheet appears inconsistent with NOI Section D.4 for POI #2; please revise as needed. NOTE: If Worksheet 10 cannot be met, please provide Worksheets 12 & 13"
    a. **Worksheet 10 does not appear consistent with response letter or supporting documents, i.e., 90% of stormwater is not managed by the BMPs indicated on the worksheet.**

6. **New Deficiency:** Worksheets 12 & 13 do not appear to include the proposed Level Spreader which is identified in Section D.4 of the NOI as providing Water Quality functions; please revise as needed for consistency.

Please provide the revised documents by close of business Friday, June 11, 2021, in accordance with resubmittal guidelines found on NCCD website. Otherwise, per DEP SOP, the application may be withdrawn.

Give me a call with any questions.

Thanks ~

Jon