

INCOMPLETENESS REVIEW LETTER – INDIVIDUAL NPDES

3/3/2025

Charlie Gauthier
Quaker Valley School District
100 Leetsdale Industrial Drive, Suite B
Leetsdale, PA 15056

Incompleteness Review Letter Individual NPDES

Project: Quaker Valley School District New High School Campus
ACCD File Number: ESP- 04006
Permit Number: PAD020098
Municipality: Leet Township, Leetsdale Borough, Edgeworth Borough

Dear Charlie Gauthier:

The Allegheny County Conservation District has reviewed the above referenced application for Individual NPDES Permit coverage and has determined that it is incomplete. The list below specifies the items that must be included in the resubmittal of your application and/or the submission of additional information. The *Pennsylvania Erosion and Sediment Pollution Control Program Manual* (E&S Manual) and the *Pennsylvania Stormwater Best Management Practices Manual* (BMP Manual) include information that may aid you in responding to some of the items listed below. The items are based on applicable laws and regulations, and the guidance sets forth the DEP's preferred means of satisfying the applicable regulatory requirements.

Please note that pursuant to 25 Pa. Code § 102.6(c)(2), this information must be received within 60 calendar days by **5/2/2025** or Allegheny County Conservation District may consider the application withdrawn.

Items for Resubmittal or Submission of Additional Information

1. §102.6(a)(1) Address the following items in the Individual NPDES Application form:
 - a. Page 1, General Information - #3: Provide the applicant type, structure, etc. in the space provided.

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- b. Page 2, Project Site Information - #11: Provide either the address number for the site on Camp Meeting Road, or provide the two closest cross streets.
 - c. Page 2, Project Site Information: For clarification purposes, if the intent is that the permit boundary is the same as the LOD for this project, please revise the total project site acreage to be the 69.6 acres rather than the entire property boundary of 158 acres.
 - d. Page 4, Stormwater Discharge Information: For the DP IDs that discharge to storm sewer, please state “via storm sewer” with the name of the receiving waters.
 - e. Page 4, Stormwater Discharge Information: For the DP ID that discharge to storm sewer owned by Allegheny County, check the box ‘yes’ for MS4 sewer (see comment #33).
2. §102.6(a)(1) Please discuss and address the following items related to the GIF. Make any necessary changes.
 - a. Coordination Information Items #3.0-3.3, page 6: eMap PA shows several locations of existing oil and gas wells on the site.
 - b. Coordination Information Item #15, page 8: eMap PA & PAGEODE identify a drinking water well located on the project site (Pa WellID: 642871).
3. §102.6(a)(1) Were responses received to the Municipal Notification Forms? Per the instructions, the signed certified mail receipts may be acceptable, *after* 30 days from when the notifications were sent. The application was submitted prior to that 30 day point, thus responses should be provided if the receiving parties responded in that timeframe.
4. §102.6(a)(2) The question regarding amount of woods/trees to be removed in the PNDI appears to have been answered incorrectly based on the pre-development conditions that identify acreage of woods on the site in the PCSM calculations. Revise the PNDI to be reflective of site conditions or provide supporting evidence that the PNDI acreage is correct (including a map exhibit). Identify in the response to this comment the anticipated area of woods (in acres) proposed to be disturbed during the life of the project.
 - a. It is also recommended to re-run the PNDI based on the initial run date being in 2023 and PNDIs are valid only for 2 years.
5. §102.4(b)(5)(ii) and §102.6(a)(1) The 2nd Phase 1 ESA from 2019 identifies 55 gallon drums present on the site with leaf staining/dead vegetation, as well as building materials with possible asbestos containing materials, and recommends additional testing in those specific areas for potential soil or groundwater contamination. This consequent testing has

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not been provided, as the Phase 2 investigation provided is for a different portion of the site and relates to other dumped materials on the site.

- a. Furthermore, per current guidance, ESAs and testing should have been conducted within 3 years of application submittal and soil samples should have been collected within the last 5 years (with a preference for within the last year).
 - b. Provide updated report(s) that shows environmental due diligence has been conducted and provide testing results for soils/groundwater, as applicable and appropriate to the RECs on the site.
 - c. Revise other portions of the application, such as the modules, where needed. Revise the E&S and PCSM drawings to identify locations of these potentially contaminated (or contaminated) hotspots.
 - d. Provide a specific soil management plan with guidance on how to identify and handle soils in these areas during earthmoving operations.
6. §102.6(a)(1) Provide a cut/fill balance sheet with soil volumes identified for the project. Check the box in E&S Module 1.
 7. §102.4(b)(5)(iii) and §102.8(f)(3) The LOD identified in the wetland report contains additional area (appears to be for a utility connection) going towards B Street from the site. This is not on the current E&S or PCSM plan versions – has that been removed from the project?
 8. §102.6(a)(1) In the soil table attached to E&S Module 1, no soils are identified as hydric, even though the following page shows that some are hydric or have hydric inclusions, and wetlands are present on the site. Revise the table to identify the hydric soil types. (PDF Page 7.)
 9. §102.4(b)(5)(ix) Per the E&S manual, the smallest scaling that should be used for drawings is 1"=60'. The drawings provided in this submission use a scale of 1"=80', which makes it difficult to decipher slopes/grading and site features. Please revise.
 10. §102.4(b)(5)(v) Identify and label the floodway and floodplain for all watercourses on the site. Use the 50' assumed floodway or provide calculations for the calculated 100 year floodway for those without FEMA mapping.
 11. §102.4(b)(5)(v) Provide a copy of the JPA plans and the accompanying ARIT.

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12. §102.4(b)(5)(ix) Identify and label all discharge points on the E&S drawings, cross referenced with the discharge points identified in the Individual Application Form.
13. §102.4(b)(5)(ix) Label the sediment basins as such in the E&S drawing set.
14. §102.4(b)(5)(viii) Provide a stage storage graph with elevations 2 & 3 labeled with the stage storage tables provided in the E&S calculations for the sediment basins.
15. §102.4(b)(5)(ix) Provide details and notes for the following BMPs in the E&S drawing set:
 - a. Skimmer (Standard Detail #7-1)
 - b. Skimmer Attached to Permanent Riser (Standard Detail #7-2)
 - c. Skimmer Landing Device (Standard Detail #7-3)
 - d. Permanent Riser Structure
 - e. Detail for the Grate on the top of the permanent riser structure and/or trash rack
 - f. Clean out stake
 - g. Emergency Spillway (Standard Detail #7-12 for riprap emergency spillway)
 - h. Basin Dewatering Device (Standard Detail #7-18)
 - i. Anti Seep Collars (Standard Detail #7-16)
 - j. Riprap Apron at Pipe Outlet to an Existing Channel (Standard Detail #9-3)
16. §102.4(b)(5)(ix) Identify locations of haul roads to be utilized while performing cut/fill and grading operations. Provide applicable details for haul road construction (Standard Details in E&S Manual Chapter 3).
17. §102.4(b)(5)(ix) Identify locations where erosion control blanketing will be installed on the E&S drawings.
18. §102.14 Identify existing riparian buffer zones for the portion of the site in the Little Sewickley Creek watershed on the E&S drawings.
19. §102.8(f)(6) and §102.8(f)(3) Label all proposed PCSM SCMs as they are identified in PCSM Module 2. Ensure the labeling can be easily seen (the bioretention areas in particular are difficult to distinguish the labeling in this original drawing set.) Also the proposed meadow area is labeled in the DA maps but not labeled on the full PCSM set. Make any necessary changes.
20. §102.8(f)(9) Identify and label all proposed discharge points, cross referenced to PCSM Module 2 and the IP Application Form on the PCSM Drawings.

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21. §102.6(a)(1) Provide separated volume and rate pages of PCSM Module 2 for each POA/DP.
22. §102.8(f)(8) and §102.8(g)(3) Explain where overflow from storm events larger than the 2 year/24 hr storm event for the bioretention areas will go. If this is routed to another PCSM SCM, the module, spreadsheet and routing calculations should reflect as such.
 - a. Explain why the bioretention areas are not represented in the hydrographs, drainage area maps, etc. Provide any supporting calculations related to the bioretention SCMs.
23. §102.8(g)(2), §102.8(g)(3), §102.8(f)(8) Provide routing calculations for the MRC Basin for the 1.2"/24 hour storm.
24. §102.4(b)(5)(v), §102.8(f)(5), §102.14, §102.8(f)(14) The watercourse/wetland report provided does not appear to have considered the possibility of additional watercourses on the southern side of the site or the northwestern side of the site. Please revisit and confirm there are not any other surface waters in those areas of the site that would require buffer protection with easements or implementation. Make any necessary changes to the application package. Module 4 may also be needed if there are smaller watercourses present on those areas of the property.
25. §102.8(f)(9) Provide a planting plan for proposed SCMs where ET credits are being taken. Per the PCSM Spreadsheet instructions, a combination of woody and herbaceous plantings should be provided (plugs, not just a seed mixture).
26. §102.6(a)(1), §102.4(b)(5)(ii), §102.8(g)(1) Provide thorough explanations and provide guidance in the plans and in the modules on how fractured bedrock and redbeds on the site are being handled and considered as it relates to stormwater management, slope construction and grading design, and sediment pollution prevention during and after site development.
27. §102.6(a)(1), §102.4(b)(5)(ii), §102.8(g)(1) Carbonaceous materials and other potentially expansive minerals were encountered during site investigation or are anticipated to be encountered based on the geotechnical report. Provide an analysis addressing the likelihood that these materials may be encountered during cut/fill operations on the site.
 - a. If carbonaceous materials will be exposed or excavated, handling of these materials should be discussed and appropriate guidance should be provided in the site soil management plan.

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- b. Provide a copy of the proposed final grading plan and recommendations, along with applicable details for slope shoring and construction materials.
28. §102.4(b)(5)(ix) and §102.4(b)(5)(vii) Due to the significant amount of engineered fill and overcut that is required to provide for stable slope construction, an additional E&S phase plan is requested for providing sufficient materials handling, stockpiling areas, haul roads, etc. during construction.
29. §102.8(g)(1) Provide a copy of the infiltration testing results and test pit descriptions for the project.
30. §102.8(g)(1) Provide a drawing showing areas that were investigated for pre-development infiltration capabilities.
31. §102.4(c) Provide an erosion potential analysis for each proposed discharge point expected to result in concentrated flow during and after construction. The IP should evaluate the stability of the flowpath from a discharge point to a surface water or storm sewer that directly discharges to a surface water.
32. §102.8(g)(1) Identify and label locations of soil testing, infiltration testing, and test pits on the PCSM drawing set. These should be cross referenced to Module 2 test pit and infiltration testing information.
33. §102.6(a)(1) Provide the MS4 notification form filled out and sent to Allegheny County for any discharges proposed to connect to their storm sewer as well as proof of delivery.
34. §102.4(b)(5)(v) The LOD in the area of where Camp Meeting Road is being redone, towards the northern corner of the site does not contain sufficient surrounding area to determine proximity to the stream on the HQ side of the site. Did the wetland investigation include this area?
35. §102.4(b)(5)(v) and §102.8(f)(5) Identify the split in the watersheds for the site on the plans (UNT to Ohio River vs. Little Sewickley Creek).
36. §102.6(a)(1) Provide an update on the PHMC Coordination.

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DEP has developed a standardized review process and processing times for all permits or other authorizations that it issues or grants. Pursuant to its Permit Review Process and Permit Decision Guarantee Policy (Document # 021-2100-001), DEP guarantees to provide permit decisions within the published time frames, provided applicants submit complete, technically adequate applications/registrations that address all applicable regulatory and statutory requirements, in the first submission. Since you did not submit a complete and/or technically adequate application, DEP's Permit Decision Guarantee is no longer applicable to your application.

As stipulated in 25 Pa. Code § 102.6(c) of DEP's Chapter 102 rules and regulations (regarding complete applications) information requested by Allegheny County Conservation District must be received within **60 calendar days** from the date of this letter, or the District will consider the application to be withdrawn by the applicant and no further action will be taken on the application. Fees are not refunded when an application is withdrawn.

Please submit copies of the revised information to the District.

Upload them to the Google drive folder using the link provided to you via email.

Please notify the reviewer at afox@accdpa.org when the revisions are completed and uploaded.

If you have any questions about your application, please contact the reviewer at 412-291-8010 and refer to **Permit Number PAD020098**.

Sincerely,

Anne Fox

Anne Fox, Senior Resource Conservationist

CC:

Martha Frech, P.E. | Streamline Engineering, Inc.

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