

Gilstrap, Sarah

From: Gilstrap, Sarah
Sent: Wednesday, January 15, 2020 11:14 AM
To: Sommer, James; Matt Golden
Cc: Wranosky, Vernon; Barton, Tim; Graves, Tom; Owens, Robert (Energy)
Subject: Beech Hollow Generation Site - 4th Deficiency Response (PAD630034)

Jim –

Please see the below **bolded** responses to each of the remaining technical deficiencies in the Beech Hollow generation site application. The updated narrative pages, drawings, NOI tables, and Worksheets were mailed to your office and the Washington County Conservation District today with a copy of the below responses. Please let me know if you have any questions regarding the updated items. Thank you.

1. Chapter 102.6(a)(1): Pertaining to the 3rd TDL, Comment # 2, the MS4 approval remains in review with PennDOT. A letter from the MS4 owner must be provided within the permit application which states that the owner accepts the increased 2-year/24-hour storm water volume into their MS4 system. The letter should state the quantified volume the MS4 system is expected to manage. A positive permit decision cannot be made until the Department receives this letter.

The Highway Occupancy Permit application and MS4 drainage report were uploaded to the PennDOT system on January 8, 2020, and both have 30-day review periods. Assuming PennDOT will have comments on the submitted application and report, Burns & McDonnell estimates that the Highway Occupancy Permit and MS4 drainage approval will be issued no later than March or April 2020.

2. Chapter 102.8(f)(8-9): Pertaining to the 3rd TDL, Comments # 4 and # 8, Plan Sheet EX006 still shows an area within the Generation Site not shaded and thus appearing to not drain or be included within a POI, although there is a change in cover type. Please explain what earth disturbance activity or other changes are proposed for this area and as applicable revise the application to include this area.

This area will collect contact stormwater from the wastewater treatment area. Stormwater and washdown will drain to the wastewater holding basin shown and will be treated before release through NPDES Outfall 005, as authorized by NPDES Permit No. PA0252808. This treatment process is detailed in the WQM Permit application currently under review by the PA DEP (Mahbuba Iasmin). Outfall 005 is shown on Drawings CS207 and CS305, and a note has been added to EX006 for clarification. This area is now included in the provided stormwater calculations for POI-2.

3. Chapter 102.6(a)(1): Pertaining to the 3rd TDL, Comment # 5, Worksheets # 2 through 4 do not correlate or flow with each other. Worksheets # 2 through 3 claim protected areas which are not incorporated or shown in Worksheet # 4, and are also not consistent with any plan sheets provided. The revised Plan Sheets CS 312 and CS 313 do not correspond with the revised Worksheet # 4s. (Explain-in writing how these calculations within Worksheets # 2 through 4 were developed and, identify these Worksheet # 4 areas on a site plan.)

Worksheets #2-4 for POI-1, POI-2, and POI-3 have been updated, and Worksheets #2 and #3 no longer claim protected areas. Instead, the protected wetland and steep slope areas are included in the post-construction stormwater management areas. Limits of disturbance shown on Worksheet #4 for each POI is now consistent with the post-construction drainage areas shown on PCSM Drawings CS312 and CS313. The total acreage of disturbance in the NOI, 58.6 acres, equals the disturbed areas on Worksheet #4s plus the site restoration areas. The site restoration areas are not included on the Worksheets as there is not a change in cover type post-construction.

- Chapter 102.8(f)(9): Pertaining to the 3rd TDL, Comment # 7, it was explained that the four squares are foundations for transmission towers. From the 10/10/19 meeting, it was stated these towers would not be constructed in this permit but constructed in the transmission line permit PAD630045. However the PAD630045 permit, contradicts the meeting statement by declaring the four towers will be constructed in this (PAD630034) permit. Please explain if these four towers will be constructed within this permit, and if so provide this information within the application and construction phasing. If not, revise the PAD630045 permit to reflect this position.

The information provided at the 10/10/19 meeting was incorrect. Burns & McDonnell's intent has always been to permit the construction of five transmission tower foundations along the perimeter of the power block with the Beech Hollow generation site. The proposed work is described in the E&S Plan narrative in Section 1.3 on page 1-3 and in the PCSM Plan narrative in Section 2.0 on page 2-1. These towers are shown on PCSM Drawing CS305 and E&S Drawing CS207, including temporary access for foundation construction. Because the southwestern slope of the power block must be stabilized to mitigate potential landslide risks, it makes sense to install the tower foundations at the same time to avoid additional slope disturbance later during construction of the overhead transmission line. Tower foundation installation is called out in Step #17 of the construction sequence on E&S Drawing CS209.

- Chapter 102.6(a)(1) & 102.8(f)(8): The PCSM Report Page 2-1 needs revised to include for the updated revision to impervious acreages on the site. The NOI will also need updated for the revisions to the Worksheets and rates. This has not been provided within the responses.

PCSM Report Page 2-1 has been updated to reflect the updated total impervious acreage. The NOI tables and Worksheets have been updated to reflect the impervious acreages, stormwater volumes, and flow rates shown on the PCSM drawings and in the HydroCAD calculations.

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