



# MONTGOMERY COUNTY CONSERVATION DISTRICT

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www.montgomeryconservation.org

December 14, 2021

222 Church Road LLC  
Attn: Zvi Bloom  
509 Cedarhill Road  
Far Rockaway, NY 11691

Re: **Incompleteness Review Letter**  
222 Church Road  
NPDES Permit Application No. PAC460661  
Cheltenham Township, Montgomery County  
Project Acres: 3.69  
Cumulative Disturbed Acres: 3.69

Dear Zvi Bloom:

The Montgomery County Conservation District has reviewed the above NOI for PAG-02 NPDES General Permit Coverage and has determined that it is incomplete. The list below specifies the items that must be included in the resubmittal of your NOI 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), this information must be received within 60 calendar days by **February 12, 2022** or Montgomery County Conservation District may consider the NOI withdrawn.

**Please also note that the NPDES application is not administratively complete, the first resubmission of requested information will be handled at no additional fee. If additional resubmissions are deemed appropriate, each resubmission will be subject to a \$500.00 fee.**

## Items for Resubmittal or Submission of Additional Information

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### A. NOI Information

*The Completeness Item comments below taken from the NPDES PAG-02 General Permit Fact Sheet from Attachment B of the Standard Operating Procedure (SOP); Review of PAG-02 General NPDES Permit NOIs. The complete list of NOI Completeness Items as noted in the General NPDES SOP can be found at the following link:*

[http://files.dep.state.pa.us/Water/Wastewater%20Management/EDMRPortalFiles/SOPs/BNPNSM\\_NPDES\\_SOP\\_PAG-02.pdf](http://files.dep.state.pa.us/Water/Wastewater%20Management/EDMRPortalFiles/SOPs/BNPNSM_NPDES_SOP_PAG-02.pdf)

#### 1. NOI form §102.6(a)(1) (3800-PM-BCW0405b – Completeness Item #1)

- a. General Information Question #2:
  - **Primary NAICS Code.** Provide the appropriate six-digit North American Industry Classification System (NAICS) code that represents the primary economic activity of the project site. The NAICS codes can be found on the NAICS section of the United States Census Bureau’s website at: [www.census.gov/eos/www/naics](http://www.census.gov/eos/www/naics) (the “Downloads” list on the left side of the screen contains the most recent list).
- b. General Information Question #3:
  - **Additional NAICS Code(s).** Provide any other applicable six-digit NAICS code(s) that represents the economic activity of the project site. More than one six-digit code may be entered into the box provided.
- c. Applicant Information Question #2:
  - **Employer ID#.** Also referred to as Federal Tax ID#, the Employer ID# (EIN) aids DEP in identifying the organization and prevents duplicate data entry from occurring. This information is required for applicants other than individuals.
- d. Applicant Information Question #5:
  - **Applicant City, State, ZIP.** Enter an appropriate city, borough, or town designation; do not enter a township designation in this area. Do not use abbreviations for the city name. Use the two-character abbreviation for the state. Include the four-digit extension to the ZIP code. If other than USA, provide the country.
- e. Applicant Information Question #7:
  - **Applicant Contact Title.** Enter the title of the applicant contact.
- f. Applicant Information Question #8:
  - **Applicant Contact Phone.** Report the phone number, including any extension, of the applicant contact.
- g. Applicant Information Question #9:
  - **Applicant Contact Email.** List the email address of the applicant contact.
- h. Applicant Information Question #10:
  - **Applicant Contact Fax.** Enter the fax number of the applicant contact.
- i. Eligibility Information Question #1 (Completeness Item #1.a):
  - **Stormwater Discharges.** Identify the surface water(s) that will receive drainage from the earth disturbance area during and following construction, and visit DEP’s Statewide Existing Use Classifications website to determine if those water(s) have existing uses of HQ) or (EV). If an existing use is not listed for the surface waters, review 25 Pa. Code §§ 93.9a to 93.9z to determine whether the surface waters are designated as HQ or EV. If either the existing or designated uses of the surface waters is HQ or EV, the applicant is ineligible to use PAG-02.

- **Per the NOI, Stormwater Discharge Information # 1 and 2, the receiving watercourse has a Chapter 93 designation of HQ and is therefor not eligible to use the PAG-02 General NPDESS Permit. Refer to the 2020 Integrated Report (<https://gis.dep.pa.gov/IRViewer2020/>) for information regarding the Chapter 93 classification of water resources in Pennsylvania.**
- j. Eligibility Information Question #8 (Completeness Item #1.a):
  - **Stormwater Discharges to Impaired Waters.** Applicants may select True where stormwater discharges will not be directed to surface waters identified as impaired in DEP’s latest Integrated Report or will be directed to impaired waters, but the applicant will implement non-discharge alternative(s) or ABACT BMPs for E&S and PCSM. The latest Integrated Report is available on DEP’s website (visit [www.dep.pa.gov](http://www.dep.pa.gov), select “Businesses”, “Water”, “The Bureau of Clean Water”, “Water Quality Standards”, and “Integrated Water Quality Report”).
  - **All E&S BMP details should be ABACT. Additional BMPs that are ABACT may be located in the Alternative BMP Guidance document available from the DEP Website at [https://files.dep.state.pa.us/Water/BPNPSM/StormwaterManagement/ConstructionStormwater/Reviewed\\_Alternative\\_BMPs.pdf](https://files.dep.state.pa.us/Water/BPNPSM/StormwaterManagement/ConstructionStormwater/Reviewed_Alternative_BMPs.pdf)**
- k. Project Site Information Question #5:
  - **Hydric Soils or other wetland features are present within the Project Site.** Select the box for Yes if there are hydric soils or other wetland features located within the Total Project Site Area, otherwise select the box for No.
    - **This response is inconsistent with information provided in Module 1.**
  - **Hydric Soils or other wetland features are present within the Project Site.** If Yes to question #5, identify that a wetland determination, conducted in accordance with DEP procedures, has been attached to the NOI.
  - **Hydric Soils or other wetland features are present within the Project Site.** The NOI may be deemed incomplete without the inclusion of a wetland determination if the answer to question #5 is Yes.
    - **A wetland determination was not located attached to the NOI.**
- l. Project Site Information Question #9:
  - **Site Location City, State, ZIP.** Report the city (or municipality), state and ZIP code of the project site location (including the 4-digit extension).
- m. Operator Information Question #1:
  - **Operator Name.** Identify the name of the organization or individual who is considered an operator.
    - **Please refer to the instructions for completing the NOI for additional information regarding an operator.**
- n. Operator Information Question #2:
  - **Contact Name.** If the operator is an organization, list an individual who may be contacted by DEP or CCD.
  - **Operator Phone.** Enter the phone number for the operator identified as the contact.
- o. Operator Information Question #5:
  - **Operator City, State, ZIP.** Enter the city, state, and ZIP code (including 4-digit extension) of the operator’s address.

- p. Operator Information Question #6:
- **Operator’s Role in Project.** Check the appropriate box to indicate whether the operator is a General Contractor, Consultant or Excavation Contractor. Select the box for Other if none of these apply.
- q. Operator Information Question #7:
- **Operator’s Responsibilities.** Briefly describe the responsibilities of the identified operator during the earth disturbance activities (e.g., bulk earthmoving, PCSM BMP installation).
- r. Earth Disturbance Information Question #1:
- **Total Earth Disturbance Area.** Report the total area of earth disturbance in acres and square feet (sf). Include the area associated with all off-site support activities that are part of the project and are not independent construction sites if these areas have been identified at the time of NOI. When reporting Total Earth Disturbance Area in acres, report to the nearest one-hundredth of an acre. Per the Earth Disturbance Threshold section of these instructions, acreage between 0.991 and 0.999 should be rounded to 1.00 acre.
  - **Total Earth Disturbance Area.** The Total Earth Disturbance Area must be fully within the Total Project Site Area.
- s. Earth Disturbance Information Question #2:
- **Pre-Construction Impervious Area.** Identify the area of pre-construction impervious surface within the earth disturbance area in sf.
- t. Earth Disturbance Information Question #3:
- **Post-Construction Impervious Area.** Identify the area of planned post-construction impervious surface within the earth disturbance area in sf.
- u. Earth Disturbance Information Question #7:
- **Coordinates.** Report the latitude and longitude of the center of the proposed disturbed area, in decimal degrees with a minimum of five digits to the right of the decimal. If the project is a linear project, then report one terminus of the project and attach a sheet specifying the other terminus of the project to the NOI.
- v. Earth Disturbance Information Question #15:
- **Act 537 Status.** Indicate whether Act 537 sewage planning approval is needed for the project. If Yes, indicate whether the approval letter is attached to the NOI.
    - **The response provided on the NOI is “No”. Please provide documentation that DEP has been contacted regarding Act 537 approval.**
  - **Act 537 Status.** If Act 537 sewage planning is necessary but the approval is not available at the time the PAG-02 NOI is submitted, the NOI will not be considered incomplete. Act 537 approval, if needed, is required prior to conducting earth disturbance activities.
- w. Earth Disturbance Information Question #16:
- **Chapter 105 Permit or Authorization.** Check the box for Yes if the project requires a permit or other authorization under 25 Pa. Code Chapter 105, otherwise select the box for No and skip question #17.
    - **Module 1 states that a sedimentation basin is being used during construction. That will normally require either a Chapter 105 permit or an off site discharge analysis. Neither has been provided.**
- x. Stormwater Discharge Information Question #1
- **Discharge point No.** Provide a three-digit identification number consisting of numerals only (i.e., no letters or other symbols) for each discharge point

receiving stormwater discharges associated with construction activity from the earth disturbance area, starting with 001 and continuing with 002, 003, and so on.

- **Discharge Points should be three digits.**
  - **Identify each discharge point(s) on the plan**
  - **Non-Surface Waters.** Check the box if the applicant is proposing any stormwater discharge to areas other than surface waters, either on or off the project site, during or following construction. For example, an applicant should check this box if a stormwater discharge point will be located at a property boundary to a swale that eventually reaches surface waters.
    - **The box should be checked for discharge points to non-surface waters.**
    - **If there will be off-site discharges (e.g., discharges to a non-surface water such as a swale, ditch, or ground surface via level spreader, that will flow through a property or properties not owned by the applicant prior to reaching a surface water), the applicant is expected to secure an easement (e.g., common law or express easement) providing legal authority for the off-site discharge, unless waived by the property owner, and to provide for adequate BMPs to prevent accelerated erosion on off-site property. Stormwater management to prevent accelerated erosion is also required for discharges to non-surface waters on property owned by the applicant. Submission of an easement for off-site discharges is not required as part of the NOI package. The PAG-02 General Permit does not grant property rights.**
  - **Chapter 93 Classification.** Report the existing use or, if DEP's *Statewide Existing Use Classifications* website does not list the water, the designated use of the receiving waters under 25 Pa. Code Chapter 93.
    - **The applicant should report the existing use per DEP classification.**
  - **Impaired.** Check the box if the receiving waters are "impaired" (i.e., not attaining water quality standards) for siltation, suspended solids, turbidity, water/flow variability, flow modifications/alterations, or nutrients according to DEP's latest published Integrated Report. The box may remain un-checked if the waters are not impaired or are impaired for other causes.
    - **Check DEP's latest published Integrated Report for impairments.**
- y. Stormwater Discharge Information Question #2:
- **Discharge Point Locations and Receiving Waters, Post-Construction.** Provide the same information in this table as in question #1, except this table requests information concerning post-construction discharges. The information in this table may be the same as in question #1.
    - **The table should be consistent with plans and DEP's latest published Integrated Report.**
- z. Certification for PAG-02 Applicants:
- **Certification for PAG-02 Applicants.**
    - **The Certification page must be signed**
2. **§102.6(a)(1) – County and Municipal Notification Forms (3800-FM-BCW0271b and 3800-FM-BCW0271c, respectively – Completeness Item #2)**
- **County and Municipal Notification.** All applicants must submit County (3800-FM-BCW0271b) and Municipal (3800-FM-BCW0271c) Notification forms as attachments to the NOI. These forms serve two purposes: 1) to provide notice under Act 14 of

planned land development activities requiring a DEP permit; and 2) to provide information to DEP or CCD concerning consistency with county and municipal plans and ordinances pursuant to Acts 67, 68, and 127 of 2000 (P.L. 483, P.L. 495, and P.L. 940)

- **No proof of receipt was submitted.**
  - **The forms have not been signed by the Municipality or county.**
  - **County and Municipal Notification.** In the event that an applicant has submitted the Notification forms to the appropriate county and municipality, but the county and/or municipality have not completed, signed and returned the forms to the applicant within 30 days, the applicant may submit the PAG-02 NOI to DEP or CCD with the following documentation: 1) copies of the County and Municipal Notification forms that were submitted to the county and municipality, in which the applicant's section is complete and signature provided; and 2) proof of receipt by the county and/or municipality (i.e., copies of returned registered mail receipts or other suitable documentation). DEP or CCD will consider county and municipal notification to be complete upon receipt of these items. If the county and/or municipality does complete and sign the Notification form(s) and return them to the applicant prior to DEP or CCD taking a final action on the NOI, the applicant must submit these forms to DEP or CCD to supplement the NOI.
3. **§102.6(a)(2) – PNDI receipt (Completeness Item #3)**
- **PNDI Receipt**
    - **The PNDI receipt must be signed.**
4. **§102.6(a)(1) – E&S Module 1 (3800-PM-BCW0406a – Completeness Item #4)**
- a. E&S Plan Information Question #1:
    - **Topography.** In the space provided, describe the existing topographic features of the project site and the immediate surrounding area. Describe land cover, structures, drainage patterns, surface waters and other features of the pre-construction (i.e., present) land surface.
  - b. E&S Plan Information Question #2:
    - **Soils.**
      - Discuss the presence of any soil limitations consistently with the E&S Manual Appendix E and how the E&S Plan was developed to address those limitations.
    - **Soils (Completeness item #4.e - 102.4(b)(5)(v)).** If hydric soils are present, a wetland determination should be attached to E&S Module 1.
  - c. E&S Plan Information Question #5 (Completeness Item #4.a - 102.4(b)(5)(ix)):
    - **E&S BMPs.**
      - Earth Disturbance Information #5 - Please ensure the table is completed completely and accurately. Per the instructions, Alternative E&S BMPs should be identified on DEP's list of reviewed alternative BMPs prior to proposing their use in a PAG-02 NOI.
    - **E&S BMPs.** Following question #5 there is a Table 1 that is intended for applicants seeking PAG-01 coverage or an individual permit for small construction activities only. Applicants for PAG-02 coverage should not complete Table 1.
  - d. E&S Plan Information Question #6 (Completeness Item #4.b -102.4(b)(5)(viii)):
    - **Standard E&S Worksheets.** Check the box if all applicable Standard E&S Worksheets from Appendix B of the E&S Manual have been completed and are attached.

- **A sediment basin is referenced in Earth Disturbance Information #5. No worksheets were located in the submission.**
  - e. E&S Plan Information Question #9:
    - **Calculations Completed.** Check the box if supporting calculations for BMP design have been completed and will be provided upon request. For applicants seeking PAG-02 coverage, this box should remain unchecked (i.e., such calculations must be provided by PAG-02 applicants).
  - f. E&S Plan Information Question #10:
    - **Calculations Attached.** Check the box if the supporting calculations have been attached to the NOI. The submission of supporting E&S calculations is required for applicants seeking PAG-02 coverage. Standard E&S Worksheets that document design calculations for a BMP may be used to satisfy this requirement; where a Standard E&S Worksheet is not available or otherwise does not fully document design calculations, the applicant must attach separate calculations.
  - g. E&S Plan Information Question #14:
    - **Temporary Stabilization.**
      - **Fertilizer type, fertilizer application rate and liming rate were not located on sheet 22. None of this information was located on sheets 23, 24, or 25.**
  - h. E&S Plan Information Question #15:
    - **Permanent Stabilization.**
      - Sheet 27 was not located in the submission. Please review your response to this section. Anchor material, anchoring method, rate of anchor material application, topsoil placement depth, and season seeding dates were not located on sheet 22. None of the information requested was located on sheets 23, 24, or 25.
  - i. E&S Plan Developer:
    - **The Module must be signed.**
5. **§102.4(b)(5)(ix) – E&S Plan Drawing(s) (Completeness Item #5)**
- a. Topography (Completeness Item #5.a - 102.4(b)(5)(i)):
    - The existing topography (including any temporary contours) with appropriate contour labels should be shown.
      - **Include existing contour labels across the project site.**
  - b. Project Site Boundary (Completeness Item #5.b - 102.4(b)(5)(iii)):
    - The project site boundary should be shown.
      - **It does not appear the line type used on the plan sheets is consistent with the line type shown in the legend for the project site boundary.**
  - c. Receiving Surface Waters (Completeness Item #5.d - 102.4(b)(5)(v)):
    - **Please identify where the discharge from the site enters the surface waters. The path can be shown on the location map in the instances where the surface waters are not located within the surveyed area.**
  - d. Discharge Points (Completeness Item #5.e - 102.4(b)(5)(ix)):
    - **All stormwater discharge points during construction should be shown on the E&S plans.**
  - e. Protection of Infiltration PCSM BMPs (Completeness Item #5.k - 102.4(b)(5)(vii)):
    - **The Drawing(s) should provide for protection of infiltration PCSM BMPs until drainage areas are completely stabilized.**

6. §102.6(a)(1) – PCSM Module 2 (3800-PM-BCW0406b – Completeness Item #6)

a. PCSM Plan Information Question #1:

- **Structural PCSM BMPs.** Identify all proposed structural and non-structural PCSM BMPs for implementation at the project site that will be utilized for volume, water quality, and/or rate control, as follows:
  - **Discharge Point(s)** – Identify all discharge point ID numbers (e.g., 001, 002) that are associated with the structural or non-structural BMP, as identified in the Stormwater Discharge Information section of the NOI, as applicable.
  - **BMP ID** – Provide a BMP ID number for each listed BMP, starting at 1. If there are two BMPs in series, each BMP should be listed on a separate row with a separate number. These BMP IDs numbers should also be identified on PCSM Plan Drawings.
  - **BMP Name** – List the name of the BMP as contained in the BMP Manual, as amended. If the BMP is not identified in the BMP Manual the applicant may select a name that best describes the BMP.
  - **DA Treated (ac)** – List the drainage area, in acres, treated by the BMP.
- **Undetained Areas.** If there are undetained areas (i.e., areas in which stormwater will not be treated by a BMP), list the total area in acres of the undetained areas.
  - **The undetailed area should be consistent with PCSM Spreadsheet – Volume Worksheet.**
- **PCSM Spreadsheet General Information Worksheet**
  - The DEP PCSM Spreadsheet, latest version, should be used.
  - **Project Type** – Select the applicable project type from the drop-down list.
  - **Post-Construction Discharge Points** All discharge points reported on the spreadsheet should be identified on site maps and/or PCSM Plans.
  - **Drainage Area (DA) (acres)** – For each discharge point, report the post-construction drainage area tributary to the discharge point that will be treated by a structural BMP. The surface area of BMPs, if present, should be included in this value. If there are undetained drainage areas that are tributary to a discharge point, those areas should be cumulatively reported in the field for “Undetained Areas”.
  - **Existing Impervious in DA (acres)** – For each discharge point, enter the actual acres of impervious surface – prior to construction – within the post-construction drainage area. This should be consistent with the NOI.
  - **Proposed Impervious in DA (acres)** – For each discharge point, enter the acres of impervious surface that are planned within the post-construction drainage area. This should be consistent with the NOI.
  - **Receiving Waters** – If the discharge is to non-surface waters (e.g., via a level spreader or other flow diffusing device), the applicant must investigate the flow path and ultimate discharge point to verify safe and non-erosive conveyance to the surface water.
  - **Ch. 93 Class** – Select the existing or designated use of the named surface water from the drop-down list. Users should check DEP’s Existing Use website first, and if not found on this website, use the designated use as contained in Chapter 93.

b. PCSM Plan Information Question #2:

- **Sequence and Critical Stages.** The PCSM sequence must include the installation and construction steps necessary to construct and implement each PCSM BMP.



- c. PCSM Plan Information Question #3:
- **Plan Drawings Developed.** Check the box if plan drawings of PCSM BMPs have been developed and will be available on-site. For applicants seeking PAG-02 coverage, this box should remain unchecked.
- d. PCSM Plan Information Question #6:
- **Sensitive Features.** Identify the presence of any naturally occurring soil conditions that may have the potential to cause pollution after earth disturbance activities are completed and the PCSM BMPs are operational and identify BMPs that will be implemented to avoid or minimize potential pollution caused by these features. These sensitive areas must also be identified on the PCSM Plan Drawings.
- e. PCSM Plan Information Question #9:
- **Pre-development Site Characterization** (Completeness Item #6.b - 102.8(g)(1)). A pre-development site characterization has been performed, including appropriate infiltration and geotechnical studies. Attach soil test results, geotechnical study results, and appropriate narrative explanations of methods and study results to the NOI.
    - **It does not appear that pre-development site characterization has been performed.**
- f. Stormwater Analysis – Runoff Volume:
- **Discharge Point(s).** At the top of the form, identify the Discharge Point ID Number(s) (e.g., 001, 002).
- g. Stormwater Analysis – Runoff Volume Question #1:
- **Design Standard – Act 167.** Check the box if the applicant is using a design standard for volume management that is contained in an Act 167 Plan approved by DEP within the past five years. In general, DEP or CCD will only accept design standards based on Act 167 Plans when those plans have been approved by DEP within the past five years (this does not include municipal ordinances enacted under Act 167 Plans).
    - **It is unclear what the designer intends to use as the design standard.**
- h. Stormwater Analysis – Runoff Volume Question #2:
- **Design Standard – Manage Net Change.** Check the box if the applicant is using the net change in the 2-year/24-hour storm, comparing post-construction conditions to pre-construction conditions, as the volume management design standard.
    - **It is unclear what the designer intends to use as the design standard.**
- i. Stormwater Analysis – Runoff Volume Question #3:
- **Design Standard – Alternative.** Check the box if the applicant is using a volume management design standard that differs from an Act 167 Plan and the net change in the 2-year/24-hour storm. While use of alternative design standards is authorized by 25 Pa. Code § 102.8(g)(2)(iv), please be advised that NOIs using an alternative design standard may require additional review by DEP or CCD.
    - **It is unclear what the designer intends to use as the design standard.**
- j. Stormwater Analysis – Runoff Volume Question #4:
- **PCSM Spreadsheet Volume Management Worksheet**
    - **Pre-Construction Volume Calculation Table** – 20% of existing impervious surface to be disturbed should appear as meadow in good condition (25 Pa. Code § 102.8(g)(2)(ii)).
      - **It does not appear that 20% of existing impervious has been identified as meadow.**

- **Post-Construction Volume Calculation Table**
    - **Woods (Fair Condition) is noted in the post-construction condition. Clearly identify areas of woods on the PCSM Plan.**
  - **Structural BMP Volume Credits** – The user should be familiar with the three basic functions of BMPs: infiltration, evapotranspiration, and water quality. Some BMPs provide one, two or all three of these functions. Proper use of and entry of infiltration, media and storage parameters is the responsibility of the user.
    - **It is unclear what BMP is proposed, and it is unclear what the function(s) the BMP is intended to serve.**
    - **The worksheets, module, and plans should be consistent.**
  - **Infiltration / Vegetated Area (SF)** – The spreadsheet does not consider hydraulic loading to BMPs. The BMP designer is responsible for selecting appropriate design criteria using the Stormwater BMP Manual or other published and defensible resources.
    - **Provide loading ratio calculations in accordance with the PA Stormwater BMP Manual.**
  - **Infiltration Rate (in/hr)** – Report the design infiltration rate or saturated hydraulic conductivity (Ksat) associated with the infiltration area, in inches per hour (in/hr) utilizing methods contained in Appendix C of the Stormwater BMP Manual or other published and defensible methods. The design infiltration rate value entered should be the tested infiltration rate adjusted with factors of safety (and other additional factors) where appropriate.
    - **Provide infiltration testing.**
  - **Infiltration Period (hours)** – Select the infiltration period (i.e., dewatering time), in hours, for BMPs that will rely on infiltration. DEP may accept infiltration periods up to 4 days (96 hours). However, 1) the maximum ponding depth for infiltration and bioretention BMPs may not exceed 2 feet at the 2-year/24-hour storm event, and 2) local ordinance requirements must be met, where applicable. Many local ordinances require infiltration periods no greater than 3 days (72 hours). The minimum infiltration period is 12 hours, which accounts for the loss due to infiltration during the 24-hour storm event.
    - **Provide data to support the infiltration period.**
  - **Media Depth (ft)** – Enter the design depth of media used for the BMP, in feet (e.g., 1.5 feet of planting soil for a rain garden or 2 feet of stone for an infiltration trench). This does not apply to certain BMPs.
    - **Enter the design depth of media. Media depth should be consistent across documentation.**
- k. Stormwater Analysis – Runoff Volume Question #9 (Completeness Item #6.e - 102.8(f)(8), 102.8(g)(2) & 102.8(g)(4)):
- **Structural BMPs.** Identify all selected structural PCSM BMPs and provide the following information:
    - **DP No.** – Identify the discharge point (DP) associated with the structural BMP.
      - **Discharge point(s) should be consistent across documentation.**

- **Infiltration Rate (in/hr)** – Report the design infiltration rate or saturated hydraulic conductivity (Ksat) associated with the infiltration area, in inches per hour (in/hr) utilizing methods contained in Appendix C of the BMP Manual or other published and defensible methods.
    - **Provide infiltration testing.**
  - **Infiltration Period (days)** – Select the infiltration period, in days, for site-wide structural BMPs. DEP may accept infiltration periods up to 4 days (96 hours). However, 1) the maximum ponding depth for infiltration and bioretention BMPs may not exceed 2 feet at the 2-year/24-hour storm event, and 2) local ordinance requirements must be met, where applicable. Many local ordinances require infiltration periods no greater than 3 days (72 hours).
    - **Provide data to support the infiltration period.**
  - **Media Depth (ft)** – Enter the design depth of media used for the BMP, in feet (e.g., 1.5 feet of planting soil for a rain garden or 2 feet of stone for an infiltration trench). This does not apply to certain BMPs.
    - **Provide media depth. Media depth should be consistent across documentation.**
  - **Infiltration Credit (CF)** – Report the infiltration credit for the BMP. The approved calculation for infiltration credit is identified in DEP’s PCSM Spreadsheet and instructions.
    - **The infiltration credit is not consistent with the Volume Worksheet. Clarify.**
  - **ET Credit (CF)** – Report the evapotranspiration (ET) credit for the BMP. The approved calculation for ET credit is identified in DEP’s PCSM Spreadsheet and instructions.
    - **The ET credit is not consistent with the Volume Worksheet. Clarify.**
- l. Infiltration Information:
- **Infiltration Information.** This section must be completed for each BMP that proposes infiltration.
    - **Complete this section for infiltrating BMPs.**
  - **Soil/Geologic Test Results** (Completeness Item #6.c - 102.8(g)(1)). Soil and geologic testing, as appropriate, must be completed for PCSM BMPs relying on infiltration in accordance with 25 Pa. Code § 102.8(g)(1) and the BMP Manual, as amended, and results must be attached to the NOI.
    - **Attach soil/geologic tests for infiltrating BMPs.**
- m. Stormwater Analysis – Peak Rate:
- **Discharge Point(s).** At the top of the form, identify the Discharge Point ID Number(s) (e.g., 001, 002).
  - **PCSM Spreadsheet Rate Control Worksheet**
    - **The DEP PCSM Spreadsheet, latest version, should be used.**
- n. Stormwater Analysis – Water Quality:
- **PCSM Spreadsheet Water Quality Worksheet**
    - **The DEP PCSM Spreadsheet, latest version, should be used.**
- o. PCSM Plan Developer:
- **PCSM Plan Developer.** The PCSM Plan Developer must sign and date this section at the location specified.
    - **The PCSM Plan Developer should sign Module 2.**

7. **§102.8(f)(9) – PCSM Plan Drawing(s)** (Completeness Item #7)

- a. Topography (Completeness Item #7.a - 102.8(f)(1)):
  - **The existing topography, including adjacent areas, with appropriate contour labels should be shown.**
- b. Receiving Surface Waters (Completeness Item #7.d - 102.8(f)(5)):
  - **Please identify where the discharge from the site enters the surface waters. The path can be shown on the location map in the instances where the surface waters are not located within the surveyed area.**
- c. Discharge Points (Completeness Item #7.e - 102.8(f)(9)):
  - **All stormwater discharge points after construction should be shown.**
- d. PCSM BMPs (Completeness Item #7.f - 102.8(f)(6)):
  - **All PCSM BMPs should be shown and labeled with identifiers cross-referenced to PCSM Module 2.**
- e. Site Utilities and Improvements (Completeness Item #7.h - 102.8(f)(3)):
  - **All proposed utilities should be shown and should be within the limits of disturbance.**
- f. PCSM BMP Construction Sequence, O&M, Recycling/Disposal, and Critical Stages (Completeness Item #7.l - 102.8(f)(7) and 102.8(f)(10)):
  - **The Drawing(s) should include the specific PCSM BMP construction sequence.**
- g. Sensitive Features (Completeness Item #7.m - 102.8(f)(2)):
  - **The Drawing(s) show sensitive features including wetlands, if applicable.**
- h. Infiltration Test Pits (Completeness Item #7.n - 102.8(g)(1)):
  - **The Drawing(s) show the location of test pits used for infiltration testing as cross-referenced to PCSM Module 2, Infiltration Information.**

**B. Miscellaneous**

1. Please note that when the NPDES application is not administratively complete, the first resubmission of requested information will be handled at no additional fee. If additional resubmissions are deemed appropriate, each resubmission will be subject to a \$500.00 fee.
2. Please take note that MCCD will not accept “piecemeal” plan revisions and all revisions must be submitted as part of a complete application package. In the event that it is agreed upon and allowed by the reviewer for individual sheets or pages to be “swapped out”, a meeting must be arranged with District staff to make the original submission available.

As stipulated in 25 Pa. Code § 102.6(c)(2) of DEP’s Chapter 102 rules and regulations (regarding complete applications), information requested by this office must be received within sixty (60) calendar days from the date of this letter, or the Montgomery County Conservation District may consider the NOI to be withdrawn by the applicant and no further action will be taken. Fees are not refunded when an NOI is withdrawn.

If you have questions about the information contained in this letter, please contact Jeffrey McKenna for E&S related questions or concerns by e-mail at [jmckenna@montgomeryconservation.org](mailto:jmckenna@montgomeryconservation.org) or by telephone at (610) 489-4506, ext. 16. For PCSM related questions or concerns, please contact Elise Eggert-Crowe via email at [EEggert-Crowe@montgomeryconservation.org](mailto:EEggert-Crowe@montgomeryconservation.org) or via telephone at (610) 489-4506, extension 25 and refer to **222 Church Road, NPDES Permit Application No. PAC460661.**

Sincerely,

A handwritten signature in blue ink that reads "Jessica Buck". The signature is written in a cursive style with a large initial "J".

Jessica Buck  
District Manager  
Montgomery County Conservation District

cc: Michael F. Pawlowski, Robert E. Blue Engineering  
Cheltenham Township  
DEP Permits Section Chief  
File