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To: EP, RegComments
Subject: 25 PA.Code CH. 102 Erosion and Sediment Control and Stormwater Management

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Attached are comments on the above reference proposed rulemaking

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Cumberland County Conservation District
310 Allen Road, Suite 301
Carlisle, PA 17013

Title 25 Chapter 102 Erosion and Sediment Control Proposed Regulations

Comments

1. 102.4(b) (5) More clarity is needed to determine if every project requires a separate plan and Narrative. The District feels that small, simple projects can place all necessary information on plan drawings.
2. 102.4 (b)(8) Can Districts charge a review fee for this scenario?
3. 102.6 Permit application and Fees.
The District feels a tiered approach to fees for General and Individual NPDES applications. Example 1-5 acres and greater than 5 acres.
PBR should keep as is.
4. 102.6 (c) (2) Provide more clarity on review time. Is it 60 days for each resubmission. How many times can it be reviewed?
5. 102.15 Permit by Rule (PBR)
 - (b) Exclusions
 - (ii) A. Sinkhole development. More clarity is needed here. What is acceptable procedures and evaluations. Also the criteria to be used should be defined.
 - (iii) (4) needs more clarity As written it is open to opinion.
 - (c) Permit conditions-
Pre-submission meeting.
The District feels that a preliminary E & S and PCSWM should be brought to the meeting.
6. 102.22 Site stabilization
 - (b) (2) Temporary Stabilization.
The District feels that 3 days is excessive for stabilization measures. 7-14 days would be more reasonable.