

Philadelphia International Airport
Realignment of TW P Additional Work



1880 JFK Blvd., Suite 1140
Philadelphia, PA 19103

May 20, 2023

Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Reference: NPDES Permit PAD230012 A-18
Realignment of TW P between TWs U & W
Philadelphia International Airport
Public Comment Response

The City of Philadelphia Department of Aviation is pleased to submit the following responses to the public comments received April 24, 2023 (attached).

Response:

The current project under review (Phase A-18) is being proposed to rehabilitate a portion of deteriorating taxiway pavement and to bring that portion of taxiway up to current FAA geometry & safety standards. It also includes the removal of an area of unused pavement.

The current project under review, Phase A-18, is located wholly within Tinicum Township, Delaware County and as such the design storm precipitation values used for stormwater calculations were obtained from NOAA Atlas 14 as per DEP guidelines.

The previously constructed Phase A-5 (NPDES issued April 3, 2019) referenced by the commenter was located in both Philadelphia County and Delaware County. This project was designed to meet the Alternative Design Standard utilizing the Philadelphia Water Department Stormwater Regulations which include the higher design storm precipitation values cited in the comment.

Given the above, the design team believes that the information submitted for Phase A-18 is a true and accurate representation of the current design standards for this project.

If you have any questions or require additional information regarding this submission, please feel free to contact Scott Stoddard at (410) 465-9600, or by email at [sstoddard@adci-corp.com](mailto:ssoddard@adci-corp.com).

Sincerely,

A handwritten signature in black ink, appearing to read "S. Stoddard", written over a light blue horizontal line.

Scott J Stoddard, P.E.
Project Engineer

Attachments: Public Comment Email

Scott Stoddard

From: Keith Fritz
Sent: Wednesday, May 10, 2023 7:51 AM
To: Scott Stoddard
Cc: Ritter, Daniel; Chaudhury, Sanjay
Subject: Fwd: Realignment of Taxiway P (between TW U and TW W) - NPDES Permit Application No PAD230012 A-18

Keith
410-300-4233

From: Smith, Christopher <christopsm@pa.gov>
Sent: Wednesday, May 10, 2023 7:49:11 AM
To: thomas.joseph@phl.org <thomas.joseph@phl.org>; Lia.Sutanto <Lia.Sutanto@phl.org>; Keith Fritz <KFritz@adci-corp.com>
Cc: Magargee, Ed <magargeee@co.delaware.pa.us>; Ferri, Michelle <FerriM@co.delaware.pa.us>; Patterson, Patrick <patpatters@pa.gov>; Hohenstein, John <johohenste@pa.gov>; Duncan, Jesse <jeduncan@pa.gov>
Subject: RE: Realignment of Taxiway P (between TW U and TW W) - NPDES Permit Application No PAD230012 A-18

[EXTERNAL]

Dear Thomas Joseph, Lia Sutanto, and Keith Fritz,

The Department of Environmental Protection (DEP) has received public comments during the public comment period for the above referenced application. DEP is asking the applicant to provide responses to the below comments [25 Pa. Code § 92a.82].

1. (From three public commenters) The Philadelphia International Airport, located in the extremely flood-prone Eastwick neighborhood of Southwest Philadelphia, is proposing to update a stormwater discharge permit related to a small construction project and I am concerned that the airport is relying on outdated precipitation data related to this construction project. The airport has been replacing pavement and runways at the facility for years to meet Federal Aviation Administration (FAA) safety standards while also updating stormwater control measures. Unfortunately, the airport's currently proposed amendment to its stormwater discharge permit uses outdated precipitation estimates that, in addition to being lower than Philadelphia's actual precipitation, are even lower than previous rainfall estimates the airport has used in earlier versions of this stormwater discharge application, specifically phase 5A.

The airport now claims that a 50-year flood in Philadelphia will produce 6.75 inches of rain in 24-hours while in its previously approved application for phase 5A of this project, the airport concluded that a 50-year flood in Philadelphia will produce 7.16 inches of rain in 24-hours. Additionally, the airport now claims that a 100-year flood in Philadelphia will produce 7.71 inches of rain in 24-hours, but in its previous application for phase 5A of this project, the airport concluded that a 100-year flood in Philadelphia will produce 8.43 inches of rain in 24-hours.

The City of Philadelphia is currently surpassing some 2080 precipitation predictions made by the Consortium for Climate Risk in the Urban Northeast (CCRUN), specifically regarding days with over 4 inches of rain. Using the National Oceanic and Atmospheric Administration's (NOAA) National Climatic Data Center's (NCDC) 1980-2010 baseline climate data for Philadelphia, CCRUN concluded that Philadelphia will witness .3 days a year with over 4

inches of rain by 2080. However, since 2010, six of the last 12 years have included at least one day of the year with more than 4 inches of rain.

In addition, since 2010, Philadelphia's annual 24-hour maximum precipitation event produced an average of 3.87 inches of rain. The airport currently claims that the maximum 2-year 24-hour storm will produce 3.24 inches of rain and in 2020 the airport claimed that a 2-year 24-hour storm would produce 3.4 inches of rain. Unfortunately, neither of these precipitation estimates are accurate and the airport's estimations are becoming increasingly inaccurate.

Philadelphians need updated, expanded precipitation data. DEP must not allow the Philadelphia International Airport to reduce its precipitation estimates given Philadelphia's rapidly increasing precipitation, which will continue to increase because of climate change. It is unconscionable for the Philadelphia International Airport to reduce its precipitation estimates. The airport has an immense responsibility to not further contribute to flooding in Southwest Philadelphia.

Please let me know if you have any questions.

Thank you.

Christopher Smith, P.E. (he/him/his) | Civil Engineer Manager
Department of Environmental Protection
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5152 | Fax: 484.250.5971
www.dep.pa.gov

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For more information on NPDES Construction Stormwater Permitting, please visit [E&S Resources \(pa.gov\)](http://www.dep.pa.gov)

From: Duncan, Jesse <jeduncan@pa.gov>
Sent: Monday, April 24, 2023 1:16 PM
To: thomas.joseph@phl.org; lia.sutanto@phl.org; Keith Fritz <KFritz@adci-corp.com>
Cc: Smith, Christopher <christopsm@pa.gov>; Magargee, Ed <magargee@co.delaware.pa.us>; Ferri, Michelle <FerriM@co.delaware.pa.us>
Subject: Realignment of Taxiway P (between TW U and TW W) - NPDES Permit Application No PAD230012 A-18

Dear Thomas Joseph, Lia Sutanto, and Keith Fritz,

The Department of Environmental Protection (DEP) and the Delaware County Conservation District (District) have reviewed the above referenced application and have identified the technical deficiencies listed below. 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 deficiencies listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth DEP's established means of satisfying the applicable regulatory and statutory requirements.

The technical deficiencies void the permit decision guarantee and any agreements that have been made regarding the timeline for the permit application review. DEP will continue to follow the permit review process procedures in the review and processing of this permit application.

Technical Deficiencies from DEP:

1. It appears that there may be a small area of proposed impervious in the post-construction condition that is outside of the existing edge of pavement (towards the southern corner of the LOD). If this is true, please re-analyze with the consideration that this area is not subject to the exemption from the 20% meadow requirement found in Section 102.8(g)(2)(ii). [Section 102.8(g)(2)(ii)]
2. The municipality has noted that the proposed project is not consistent with their stormwater management ordinance. Following the DEP document titled "Policy for Consideration of Local Comprehensive Plans and Zoning Ordinances in DEP Review of Authorizations for Facilities and Infrastructure," we will continue with our technical review; however, we will not be able to issue the Chapter 102 NPDES permit until we receive an Act 167 Ordinance consistency letter (i.e., letter, memo, or other format) from the Municipality. [Section 102.8(f)(15)]
3. The northern long-eared bat (NLEB) federal listing was reclassified as endangered effective March 31, 2023. The Pennsylvania Natural Diversity Inventory has been updated to reflect this change. Considering this, please perform an additional PNDI search to ensure appropriate protection measures for this species. Hopefully, the PNDI will indicate that no further review is required by the U.S. Fish and Wildlife Service (USFWS). If a further review is required, then you will need to consult with and obtain a clearance from the USFWS before we can complete our review. Please conduct another PNDI (dated after 03/31/2023) and provide a copy of the PNDI, PNDI receipt and certification, and if necessary, any avoidance measures or other issues of the USFWS. [Section 102.6(a)(1)]

Technical Deficiencies from Delaware County Conservation District:

The District does not have any comments.

You must submit a response fully addressing each of the technical deficiencies set forth above. Please note that this information must be received within 30 calendar days from the date of this letter, or DEP may deny or withdraw the NOI/application. Alternatively, you may consider a voluntary withdrawal.

Please submit a response letter addressing the above deficiencies and 2 hard copies of the revised information (one set should include **highlights** of all revisions) to the District at 1521 N Providence Rd, Media, PA 19063.

In addition, please submit an electronic copy (PDF) of your response letter and the revised information (all revisions should be **highlighted**) in electronic form to Jesse Duncan at DEP via email at jeduncan@pa.gov (via FTP, if necessary).

Please coordinate with the District prior to resubmitting. The District may require a District application and/or additional fees associated with your resubmission.

Please be advised that if your response does not satisfy the technical deficiencies, in general your NOI or application will proceed to an Elevated Review. If you do not believe the technical deficiencies can be fully addressed within the required timeframe, you should consider a voluntary withdrawal. If a permit application is denied, there is no recovery of fees available; however, if you voluntarily withdraw the NOI or application and then submit a new NOI or application for the same project, previously paid disturbed acreage fess will be reapplied to the new NOI or application.

If you believe that any of the stated deficiencies are not significant, instead of submitting a response to that deficiency, you have the option of requesting that DEP make a permit decision based on the information you have already provided regarding the subject matter of that deficiency. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency.

If you have questions about your NOI/application, please contact Jesse Duncan by e-mail at jeduncan@pa.gov or by telephone at 484-250-5826 and refer to Chapter 102 NPDES Permit Application No. PAD230012 A-18, to discuss your questions or to schedule a meeting. You must attempt to schedule any meeting within the 30 calendar days allotted for your reply.

Sincerely,

Jesse Duncan | Project Manager
Department of Environmental Protection | Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5826 | Fax: 484.250.5971
www.dep.pa.gov

Duncan, Jesse

From: Duncan, Jesse
Sent: Tuesday, May 23, 2023 1:04 PM
To: thomas.joseph@phl.org; lia.sutanto@phl.org; Keith Fritz; Scott Stoddard
Cc: Smith, Christopher; Magargee, Ed; Ferri, Michelle
Subject: Realignment of Taxiway P (between TW U and TW W) - NPDES Permit Application No PAD230012 A-18

Thomas Joseph, Lia Sutanto, and Keith Fritz,

Thank you for your recent response to the below technical deficiency comments that were emailed on April 24, 2023. Below, please find additional technical comments for the above-referenced project (with each number referencing the number of each previous comment):

Technical Deficiencies from DEP:

1. This comment has been addressed.
2. This comment has not been addressed. Once available, please provide an Act 167 Ordinance consistency letter from the Municipality. [Section 102.8(f)(15)]
3. Regarding the updated PNDI search results, the DCNR and PA Game Commission Potential Impacts have been addressed. However, please note that the PNDI response letter previously received from PA Fish and Boat Commission indicated that the following measures should be taken for this project:
 - a) "A super silt fence barrier should be placed and maintained at the edge of the proposed area of disturbance, in between the waterbody and the stockpiles listed above, to prevent turtles from accessing active work zones in the segments that were determined to be potential habitat. This fence should be installed during the inactive period of the turtle (October 15-April 15) so that active turtles or their nests do not get trapped in the work zone."
 - b) "Any turtle found on site should be relocated to the nearest aquatic habitat. Additionally, the PFBC must be contacted within 48 hours of the find."

Please make any necessary revisions to the plan drawings to ensure that these items are addressed. [Section 102.6(a)(1)]

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