

MEMORANDUM

TO: Lehigh County Conservation District

From: Hanover Engineering

Date January 29, 2026

RE: **LCCD TECHNICAL COMMENTS and RESPONSES—PORTLAND STREET:**

The following items are included in this resubmission:

1. PCSM plans (Includes Sheet 2 with changes).
2. Revised MRC Design Summary Sheet
3. Revised 50 and 100 Year routing through six foot weir length.

Below are the comments provided in the CCD email of 1/23/2026. Our responses are in bold/**Yellow** below each comment.

1. *Original Deficiency #5.b: Please revise the ES and PCSM plan drawings to depict the gaging station and effluent discharge line from the upslope Heleva Landfill. Due to the proximity of the existing effluent line and the proposed building foundation, sufficient information should be provided to demonstrate adequate clearance between these features.*

Due to this ongoing coordination item with EPA, a permit special condition will likely be needed so that the gaging station, effluent line, etc. fates can be finalized. LCCD will follow up regarding this item.

Written acceptance (or comment) of the following special condition should be provided by the applicant within 7 calendar days.

RESPONSE: As discussed, we will reach out to the EPA on this matter. Resolution of this matter has been discussed with the CCD and the CCD will be updated accordingly.

2. *Original Deficiency #8.b.iv: MRC Design Summary sheet – The following comments should be addressed: MRC BMP Design Values and Standards – The calculated MRC BMP Release Rate appears to be overstated. Please revise. **The release rate still appears to be in error. 0.023 cfs is currently used whereas the calculated value should be 0.01 cfs * 0.74 = 0.0074 rounded to 0.01 cfs. Please review and clarify/revise.***

The comment has not been adequately addressed by the resubmission. The MRC Spreadsheet used to calculate Equivalent Impervious utilizes a newer design standard of 0.02 cfs/acre of Equivalent Impervious. The discharge standard of 0.01 cfs/acre needs to be utilized to continue with this current proposal.

RESPONSE: Based upon the calculations as designed and included in the report, the discharge through the gooseneck overflow (designed at 1 inch) is now 0.013 cfs. Rounded this value would be 0.01 cfs. Given the magnitude of these differences (in

the thousandths of a cfs) any modification would make negligible differences. Therefore, we believe as designed, the discharge rate requirements (0.01 per MRC standards in effect) are achieved.

THE MRC SUMMARY CHART HAS BEEN REVISED FOR THE 0.01 cfs PER current Standards. See attaches Sheet 1 of the MRC Summary..

3. *Original Deficiency #8.b.v: MRC Design Summary sheet – The following comments should be addressed: MRC BMP Design Values and Standards – A number of design values on page 2 are inconsistent with the peak rate analysis and construction details. These inconsistencies include, but are not limited to, BMP Footprint Area, 2-year Storm Ponding Depth, Maximum Ponding Depth, Overflow Bypass Elevation, Media Depth, Media Void Space, Top of IWS, Underdrain information, IWS available for Routing, Total 2-Yr/24-Hr Runoff Volume Managed by BMP, etc. Please revise. The following errors in the resubmission should be addressed: Internal Water Storage (IWS) Depth (ft), Top of IWS Elevation (ft) – Without an upturned elbow and the underdrain not at the BMPs bottom elevation, there is no IWS. See Original Deficiency #8.b.iii above. The revised MRC underdrain detail provides an upturned elbow disconnected from the drain. In order to retain the IWS (and qualify as MRC), the underdrain should be connected to the upturned elbow. See screenshot example from MRC concept paper below:*

RESPONSE: The underdrain configuration has been modified as per this comment. See revised details on SHEET 2.

4. *Original Deficiency #9.g: PCSM sheet 2 – Please consolidate the MRC Operation & Maintenance information & Critical Stage of Construction (bottom left) with the information provided in the middle of the same sheet. Please consolidate the MRC O&M Notes (center of sheet). The comment has not been completely addressed by the resubmission as indicated in the response letter. See screenshot below:*

RESPONSE: Per this comment and graphic supplied the information has been consolidated See SHEET 2.

5. *Original Deficiency #9.i: PCSM sheet 2 – Please revise the Basin 1 stage-storage table for consistency with the values utilized in the peak rate analysis. There appear to be some minor errors in the stage-storage table on PCSM sheet 2 (i.e. elevation 387.64, etc.) Please revise the Basin 1 stage-storage table on PCSM sheet 2 to provide true stage storage values (not those used for the MRC routing calculations). This will be*

critical to construction (in case of storage product substitution) and for as-built purposes.

RESPONSE: Actual stage storage volumes (not reduced for MRC routing) have been placed on PCSM Sheet 2 as per this comment.

6. Please correct the minor errors in the peak rate pond report (weir structures) when compared to the construction details

RESPONSE; The hydrographs/weir structure was re-run from the 3.75 + 2 (5.75 total width) to the 6 foot interior width (4 and 2 feet) of the structure box. The only impact is on the 50- and 100-year overflow elevations from the Underground Basin. This impact is less than a 0.10 increase in discharge. However, because of how small this rate is, there is essentially zero change in the max height elevations. A copy of the re-run 50 and 100 year hydrographs is included in this resubmission.