



Somerset Conservation District
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RECEIVED

June 8, 2007

JUN 11 2007

Shaffer Mountain Wind, LLC
ATTN: Ellen Lutz
One South Broad Street
Philadelphia, PA 19107

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOMERSET CONSERVATION DISTRICT

RE: E&SPC Plan Technical Deficiencies-
Shaffer Mountain Wind, LLC, Shaffer Mountain Wind Farm,
Wind Turbine Project, Ogle & Shade Townships, Somerset
County, Napier Township, Bedford County, NPDES Individual
Permit Application PAI-0556-07-001

Ms. Lutz,

The erosion and sediment pollution control plan (E&SPC) for this project has been checked for completeness and contains sufficient information to conduct a technical plan review.

However, upon completion of the technical plan review, several deficiencies were found to exist. The identified deficiencies must be addressed before the E&SPC plan can be approved.

Please note the following:

An E&SPC plan review meeting was held on May 11, 2007 with representatives from Gamesa, Amec Earth & Environmental, DEP and the Bedford and Somerset Conservation Districts. The intended purpose of this meeting was to complete a precursory technical plan review of the project with the owner and designer present to ensure understanding of what plan revisions would be required for the approval of the E&SPC plan. As a result of this meeting, minutes and notes of the review session and related discussions were taken by plan designer and project engineer Joe Bellini. Those items were placed in a 5 page meeting summary, which has been attached for your convenience. From this summary the Conservation Districts and DEP have accepted the comments contained within that address the majority of items discussed that day. Those items described within along with the requested additions and/or revisions below need to be submitted to the Conservation District for review.

1. Summary Corrections:

- a. Page 2. The NPDES permit can not be issued without PNDI approval. Please revise.
- b. Page 2. An 18" sock = 30" filter fence and a 24" filter sock = super silt fence. Please revise.

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- c. Page 3. replace 12" sock with 24" sock. Please revise.
- d. Page 4. & 5., slopes steeper than 3H:1V require matting.
2. 102.4(b)(3) "The Erosion and Sediment Control Plan shall be prepared by a person trained and experienced in erosion and sediment control methods and techniques, and shall be designed to minimize the potential for accelerated erosion and sedimentation". As part of this requirement, a plan preparer's qualifications should be listed in the E&SPC plan narrative. Please address.
3. There is some indication that wetlands exist within the project area. The plan narrative illustrations identify a couple of them. However, no wetland report or study has been provided. Situated in a EV/High Quality watershed as this project is, upland wetlands may exist. Please provide documentation that this and other water resources, surface or otherwise have been adequately assessed and documented.
4. Hydric soils are one of three indicators that wetlands may exist. You have stated in the plan narrative that no Hydric soils exist within the project area. Upon further assessment of the soil types illustrated and tabulated within the plan narrative there appear to be 3 Hydric soils and 10 soils with Hydric components. You are required to identify any Hydric soils within the plan narrative. Please address.
5. Proposed contours/grades of all earth disturbance, access roads specifically per this comment need to be shown on the plan drawings. Please address.
6. A topographic map showing offsite drainage areas has not been included in the plan narrative. Please address.
7. As mentioned within the summary and discussed at the May 11th review meeting, detailed construction sequencing is necessary. Proper sequencing and planning not only limits exposed areas but reduces the probability of sediment-laden runoff during construction. It is imperative that timber harvesting, road building activities and BMP placement occur nearly simultaneously using a "stabilize as you disturb approach". In order to achieve this, precise coordination of all earthmoving activities is required. Please address.
8. The removal of temporary BMP's has not been provided in either the plan narrative or plan drawings. A complete

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description regarding how all temporary controls will be removed and disposed of is required. Please address.

9. Proposed contours for all sediment traps are not shown on the plan drawings. Please address.
10. Both temporary and permanent seeding procedures have been shown on the plan drawings and touched upon in the plan review summary. However, specifics regarding the type of seed mixture needs to be pre-determined based on soil tests and protocol described in the E&SPC plan. It is imperative to get the right cover quickly especially within a sensitive project area such as this. Please address.
11. Identify time frames for completing specific maintenance & repairs for each BMP proposed. "Immediately" is great but does not constitute or define a time frame. Please address:
12. How will sediment captured and removed from BMP's be disposed of? Please provide direction on how the disposal of sediments will be handled on the plan drawing.
13. Project construction wastes are to be identified. Please identify them in the plan narrative.
14. Will soil/rock borrow/waste areas be required for this project. If so, all offsite borrow or waste areas must be identified and have E&SPC plans designed and implemented. Please address this in the plan narrative and drawings.
15. Please provide detailed installation procedures for proposed cross-pipes. How will clean water for which these cross-pipes are intended to convey be kept clean? Please address.
16. Stated within item #8 of the plan drawing construction sequence is the term "specified by engineer". This is unacceptable. Please remove.

Should you have any questions regarding the identified deficiencies, please contact this office to schedule a meeting. The meeting must be scheduled within the 30 day period allotted for reply, unless otherwise extended by the Conservation District. If you believe the stated deficiencies are not significant, you have the option of declining asking the District to make a decision based on the information you have already made available. If you fail to respond to this request by Monday July 9, 2007 your application may be denied.

DEP 003

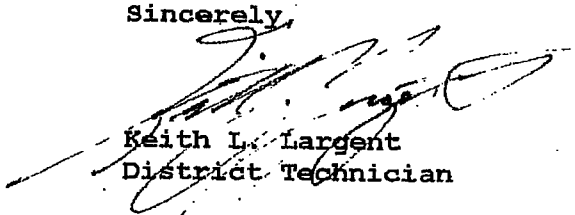
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The required information/corrections along with a \$25.00 revision review fee (payable to the Somerset Conservation District) must be provided in order to continue processing your permit application. Only one complete plan resubmission that addresses all of the items will be reviewed.

In order to save paper and time, only one complete plan should be submitted with all the erosion and sediment pollution control deficiencies corrected. Once the corrections are made and deemed acceptable by this office you will be required to submit two additional sets of the corrected E&SPC and PCSM plans, accompanying narrative, drawings and specifications. If all E&SPC items have been addressed, the Conservation District will approve the plans and forward them to DEP's SWRO for concurrence and permit issuance.

Should you have any questions regarding this matter, please feel free to contact me.

Sincerely,



Keith L. Largent
District Technician

KLL/kl

Enclosure

cc: Project File
Ogle Township
Shade Township
Napier Township
Correspondence File
AMEC Earth & Environmental, Inc.
Bedford County Conservation District
DEP-SWRO, Permitting & Technical Support

DEP 004