



# MONTGOMERY COUNTY CONSERVATION DISTRICT

143 Level Road • Collegeville, PA 19426-3313 • 610-489-4506 • Fax: 610-489-9795  
www.montgomeryconservation.org

## **Top 12 Pointers to Help Facilitate an Efficient Completeness Review**

### **1. Was a pre-application meeting conducted?**

While a pre-application meeting is not required, conducting a pre-application meeting helps to establish a meaningful dialogue between the developer, the designer and the Conservation District, as well as helps to identify site constraints early in the site planning and design process.

### **2. Do the E&S and PCSM plans identify where the discharge from the site enters the surface waters?**

The coverage of the plan maps should include sufficient surrounding area so that tributary drainage areas as well as receiving watercourses can be identified and evaluated for resistance to erosion. Where receiving watercourses are located beyond coverage of the plan maps, they may be identified on a USGS topographic map in the narrative or on the plan drawings. Also, when discharges do not directly enter a surface water or storm sewer, NOI Sections C.5 and D.5 should be noted accordingly, and an erosion analysis from the discharge to the surface water or storm sewer should be prepared.

### **3. Was site evaluation and soil testing completed?**

Comprehensive stormwater management begins with a thorough assessment of the site and its natural systems, and designers are encouraged to conduct the soil evaluation and investigation early in the site planning and design process so that information gathered in the soil evaluation and investigation process can be incorporated into the design. Appendix C in the PA Stormwater BMP Manual provides specific guidelines for the successful construction and long-term performance of infiltration BMPs.

### **4. Are the E&S and PCSM BMP labels consistent throughout the plans and calculations?**

E&S and PCSM labels should be consistent with those used on the detail sheets and in the supporting calculation section(s) of the respective narrative. For example, if an infiltration basin is proposed, label it as an infiltration basin and not a detention basin even when it is routed like a detention basin.

### **5. Quality Assurance / Quality Control review completed?**

Are the NPDES requirements thoroughly understood, and were the plans and reports reviewed prior to submission to ensure that the requirements were met? Are the references in the Completeness Review Checklist specific and accurate? Are the specific page numbers provided in the Checklist?

### **6. Are critical stages identified on the E&S and PCSM plans?**

§102.8(k) requires a licensed professional or a designee be present onsite and be responsible during critical stages of implementation of the approved PCSM plan and identifying them consistently between the NOI and the construction sequences helps to expedite reviews.



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## **7. Are the floodplains and floodways shown on the E&S and PCSM Plans?**

All existing streams, watercourses, wetlands, other surface waters, Federal Emergency Management Agency (FEMA) floodways and floodplains within or in close proximity that could affect or be affected by the project should be shown on the plan map(s). Perennial and intermittent streams should be identified, and stream names should be provided. Unnamed streams should be labeled “Unnamed tributary to...” Lastly, remember in the absence of a FEMA delineated floodway, it is assumed to be 50 feet from the top of each bank.

## **8. Does the PCSM narrative include a written explanation of 102.8.(b)(1) through 102.8.(b)(8)?**

§102.8 requires a written PCSM plan to be developed.

## **9. Are the E&S and PCSM plans labeled and provided separately?**

§102.8.(d) requires the E&S and PCSM plans and narratives to be provided separately.

## **10. Are the receiving stream’s designated and existing uses provided?**

There is a distinction: all streams in Pennsylvania are classified based on their designated and existing water uses and water quality criteria. Designated uses for surface waters are found in 25 Pa. Code §§ 93.9a—93.9z. Existing uses of surface waters are usually the same as the designated use, except where information has been provided to or obtained by the PA DEP, which indicates that a particular water body actually attains a more stringent water use than the designated use. Existing uses are protected pursuant to 25 Pa. Code §§ 93.4a—93.4c. Please see <https://www.pacode.com/secure/data/025/chapter93/chap93toc.html> for more information.

## **11. Is the source and cause of any receiving stream impairment(s) identified?**

eMap will provide a plethora of information; be sure to identify any impairments listed in the Pennsylvania Integrated Water Quality Monitoring and Assessment Report Categories 4 and 5.

Why is this important? If the discharge will be to surface waters identified as impaired waters, there may be no net change (pre-condition to post-condition) in volume or rate or water quality of the stormwater discharge in order to use the General (PAG-02) NPDES Permit.

## **12. Does NOI section D.4 accurately reflect the 2-year/24-hour and 100-year/24-hour storm volumes?**

For rate control functions, provide the volume of stormwater treated and acres treated for the 100-year/24-hour storm event, and for Volume Control and Water Quality functions, provide the volume of stormwater treated and acres treated for the 2-year/24-hour storm event.