



851 Chemung Street
Horseheads, New York 14845

January 4, 2019

Mr. Jamie Burgess, Code Enforcement Officer
Village of Horseheads
202 South Main Street
Horseheads, New York 14845

**Re: KFC
2138 Grand Central Avenue, Village of Horseheads
Review of Stormwater Pollution Prevention Plan**

Mr. Burgess:

I have completed a cursory review of the above-referenced project regarding the proposed stormwater management system for that project.

- Stormwater Pollution Prevention Plan (SWPPP) for KFC at 2138 Grand Central Avenue - Horseheads, NY, Not Stamped by a NYS Licensed Professional Engineer, Prepared by Davidson Architecture & Engineering, LLC, Prepared for the Delventhal Company, Dated 2018, Received November 5, 2018
- Site Plan Drawings for a New Development for KFC at 2138 Grand Central Avenue (Sheets C1.1, C1.2, C1.3, C1.4, C2.1, C2.2, C3.1, and C3.2), Village of Horseheads, Chemung County, NY, Stamped by a NYS Licensed Professional Engineer, Prepared by Davidson Architecture & Engineering, LLC, Dated August 8, 2018

My cursory review comments and questions regarding the SWPPP and stormwater management system for the above-referenced project, based upon the submitted information, are as follows.

I. STORMWATER MANAGEMENT

1. When compared to the original, approved site plans for the "RITE AID – CONIFER COMMERCIAL" project (Dated March 2008), the currently proposed site plan for the "Conifer Commercial" portion of the project is different than the originally approved site plans. Given this revision to the site plans, the SWPPP (including the stormwater management system design) should be updated to address the current New York State Stormwater Design Manual (including Runoff Reduction requirements and Soil Restoration requirements).
2. Specific requirements for the proposed soil restoration should be included on the plans and SWPPP to clarify the Contractor's responsibilities and work in regards to this item. It is recommended that NYSDEC's document entitled Deep-Ripping and Decompaction, April 2008, be included as part of the SWPPP.

It is important to note that for pervious areas that are compacted during construction, but do not undergo soil restoration, the Hydrologic Soil Group (for modeling purposes) has to be increased by one group (for example, HSG C to HSG D).

3. From a cursory review, it does not appear that the existing stormwater management basin was constructed in accordance with the original approved plans (entitled RITE AID – CONIFER COMMERCIAL, dated March 2008, prepared by Passero Associates).
 - As per the topography provided for the detention basin in the Davidson plans, it appears that the storage volume between elevation 887 and 889 is less than the volume outlined in the calculations in the original 2008 SWPPP.
 - As per the March 2008 SWPPP, the top of berm elevation was proposed to be 891. As per the topography provided in the Davidson plans, the top of berm elevation is less than 891.
 - The outlet storm sewer from the basin was intended to be 10-inch diameter, while the current plans indicated that this pipe is 12-inch diameter. The proposed smaller diameter pipe was intended to provide a hydraulic restriction, to reduce peak stormwater flows being discharged from the basin.
 - The proposed screen was not placed around the low flow orifice.
4. As per the calculations included in the original 2008 SWPPP, the existing storm sewer (on the Rite-Aid site) was designed to accommodate only a 10-year storm event. On the other hand, the stormwater management basin is intended to accommodate up to the 100-year storm event. How will stormwater flows, in excess of the capacity of this existing storm sewer and the proposed new storm sewer, be conveyed to the stormwater management basin?
5. In regards to the sizing of the storm sewers, consideration should be given to the effects of tailwater (presented by the stormwater basin) on the overall hydraulics of the storm sewer system. Complete hydrologic and hydraulic calculations (including Time of Concentration calculations) should be provided.
6. It is unclear from the submitted plans how roof runoff is proposed to be collected and conveyed. As such, detailed information on how roof runoff is proposed to be managed should be provided on the plans and in the SWPPP.
7. A detail of the proposed catch basins is requested.
8. What are the elevations along the edge of Grand Central Avenue at the proposed entrance drive? Will stormwater have a tendency to pond/puddle at this proposed entrance? Would a drainage system be needed at this entrance?
9. A portion of an existing 12" CPPP storm sewer is shown on Sheet C1.2 that discharges to the existing stormwater management basin. Where is the entirety of this storm sewer located?
10. What is the nature of the existing "CB" near the southeast corner of the project property? Is this a dry well? Does this have a storm sewer exiting it?

III. SWPPP

1. In various locations in the submitted plans (including Sheet C1.1 and Sheet C1.4) and SWPPP, the Village of Horseheads is mistakenly referred to as the City of Horseheads.

2. In various locations in the submitted plans (including Sheet C1.1 and Sheet C1.4) and SWPPP, reference is made to complying with City standards and “jurisdictional” standards. It is recommended that any such standards be clearly specified.

On Sheet C2.1, it is noted that “*Prior to land disturbance, contractor shall install perimeter silt fence as shown per City of Horseheads standards*”. It is our understanding that the Village of Horseheads does not have their own standards for erosion and sediment control measures.

3. On Page 2 of the SWPPP narrative under “Receiving Waters”, it is noted that “*The entire site drains to a tributary to McMann’s Creek. Project is not within the jurisdiction of an MS-4*”. The following is noted.

- The Village of Horseheads is a designated MS4 and has jurisdiction regarding this project.
- The receiving stream is named McCann’s Tributary.

4. It is requested that a copy of the current SPDES General Permit for Stormwater Discharges from Construction Activity be included in the SWPPP.

5. Details for the various erosion and sediment control measures from the New York State Standards and Specifications for Erosion and Sediment Control should be included in the SWPPP and/or plans. Also, a detail for the concrete washout should be included in the SWPPP and/or plans.

6. Details for the proposed rip rap pad for the proposed storm sewer discharge should be provided on the plans.

7. Contrary to the information noted on Page 7 of the SWPPP narrative, a *Qualified Inspector* shall conduct a site inspection at least every seven (7) calendar days.

8. The SWPPP should note the following.

Trained Contractor - Prior to the commencement of construction, an owner or operator shall have each contractor and subcontractor, that has been identified as being responsible for implementation of the Stormwater Pollution Prevention Plan (SWPPP), identify at least one employee from their company (Trained Contractor) that has received 4 hours of endorsed E&SC training. The Trained Contractor must be on site on a daily basis when soil disturbance activities are being performed and will be responsible for implementation of the practices included in the SWPPP.

III. MISCELLANEOUS

1. In accordance with the Village’s Stormwater Management and Erosion and Sediment Ordinance, a formal, signed enforceable operation and maintenance agreement for the stormwater collection and management system shall be provided by the Applicant. Furthermore, this agreement must reference and include an approved Operation & Maintenance Plan that are specific to the proposed stormwater management practices. It is recommended that the O & M Plan outline steps and measures to be implemented if operational/performance issues are encountered with the proposed stormwater infiltration system.

This agreement shall be binding on all subsequent landowners and recorded in the office of the County Clerk as a deed restriction on the property. Also, the Applicant shall convey to the Village easements and/or rights-of-way to assure access for periodic inspections by the Village or their representatives (and for maintenance if required). These agreements, as well as the Operation & Maintenance Plan, shall be subject to the review and approval of the Village of Horseheads, their attorney, and Chemung County Stormwater Coalition.

2. This review pertains to stormwater management. The Applicant is responsible to obtaining all necessary approvals, including those from the Village of Horseheads. Also, for example, a driveway permit would be required from the Chemung County Department of Public Works and the Chemung County Sewer District would be responsible for reviewing and accepting the proposed sanitary lateral connection and grease trap.
3. In accordance with the SPDES Stormwater General Permit for Construction Activity, documentation must be included in the SWPPP that the proposed construction activities will not adversely affect a property that is listed or is eligible for listing on the State of National Register of Historic Places (including archeological sites).

If you have any questions or comments regarding this letter, please do not hesitate to contact me. Furthermore, I would be happy to meet to discuss this project in greater detail.

Sincerely,

A handwritten signature in blue ink that reads "Jimmie Joe Carl". The signature is written in a cursive style with a large initial "J" and "C".

Jimmie Joe Carl, P.E.

Cc: Mark Watts, Chemung County Soil & Water Conservation District
Jessica Verrigni, Chemung County Stormwater Coalition
Andrew Avery, P.E., Chemung County DPW