



EXHIBIT "C"
DESKTOP ANALYSIS



December 12, 2022

Sent Via Electronic Mail

Mr. Jim Wendelgass, Interim Township Manager
East Coventry Township
855 Ellis Woods Road
Pottstown, PA 19465

Subject: 851 Bethel Church Road (Nolt Trucking)
Wetlands and Watercourses Desktop Evaluation
CEC# 226808

Dear Mr. Wendelgass:

Carroll Engineering Corporation (“CEC”) engaged the services of Maureen Watson-McDermott, the Wetlands Division Manager and Partner at Penn’s Trail Environmental of Hatfield Pennsylvania, who specializes in the identification and delineation of environmental resources. Penn’s Trail has provided a written summary of the watercourses, wetlands, and hydric soils present at 851 Bethel Church Road (attached). These features have been depicted as an overlay on an enlargement of the aerial image and property boundary included on the original permit plan consisting of four (4) sheets titled “Nolt Trucking Circular Concrete Storage Tank with HDPE Foundation Liner for Food Processing Waste Spring City Acres, LLC” prepared by Penn Del Engineering & Consulting LLC, dated June 13, 2021. Additionally, an enlarged aerial has been provided by Penn’s Trail, which notes potential areas of Waters of the Commonwealth and/or wetlands based on their observations.

An on-site evaluation was not conducted by Penn’s Trail, but rather, publicly available sources were utilized in identifying the noted resources above. These sources consist of the following:

1. FEMA’s National Flood Hazard Layer FIRMette
2. Hydric Soil Rating provided by Natural Resources Conservation Service Web Soil Survey
3. U.S. Fish and Wildlife Service – National Wetlands Inventory

Determination of any regulated Waters of the Commonwealth and/or Wetlands will need to be conducted on-site in order to establish their presence and actual boundaries. It should be noted that the drainage area of the swale to the east of the proposed storage tank is approximately 77 acres according to the USGS Stream Stats drainage area delineation tool. Therefore, the requirements for a General Permit would be waived in accordance with §105.12(a)(2) of Title 25 of the PA Code.

Today's Commitment to Tomorrow's Challenges

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East Coventry Township
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Please feel free to contact me via email at bflaharty@carrollengineering.com or by mobile phone at 484-995-7137 with any questions.

Very truly yours,

CARROLL ENGINEERING CORPORATION

A handwritten signature in blue ink, appearing to read "Brady L. Flaharty".

Brady L. Flaharty, P.E.
Township Engineer

BLF:cam

Attachments

cc: Mark A. Hosterman, Esquire, Township Solicitor, Wisler Pearlstine, LLP
William N. Malin, P.E., Vice President, CEC
Christopher Peterson, P.E., CEC
Thomas G. Wilkes, P.E., CEC



Penn's Trail Environmental, LLC
21 East Lincoln Avenue, Suite 160
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Phone: (215) 362-4610
e-mail: mwmcdermott@pennstrail.com

Mr. Christopher Peterson
Carroll Engineering
949 Easton Road
Warrington PA 18976

December 8, 2022

RE: Regulated Features Desktop Site Evaluation Summary Letter of Findings
851 Bethel Church Road Property
East Coventry Township, Chester County, PA
PTE# 6144

Dear Mr. Peterson:

Penn's Trail Environmental, LLC (PTE) has completed a Desktop Resource Study and Mapping Evaluation for Potential Regulated features at the referenced property above. The purpose of this evaluation was to confirm/verify the potential of any regulated Wetlands and/ or Waters, including Hydric Soils, within the property boundaries. Our findings indicate that there are areas that would be considered Federal and State regulated waters including wetlands present. Using the USDA/NRCS Web Soil Survey, the site does include soils that would be considered Hydric. Criteria for determination of Regulated Features is per the *Army Corps of Engineers Wetlands Delineation Manual* (1987) and the *Eastern Mountain and Piedmont Regional Supplement* (2012) criteria.

The site was evaluated by a wetland scientist using all available on-line mapping resources, including Google Earth images, USDA/NRCS Web Soil Survey, USGS, NWI and FEMA mapping sources. The Soil mapping includes an area of Croton (CyA) soils, which are considered Hydric Soils (see attached mapping). The Google Earth image (also attached) clearly shows to the PTE wetland scientist that the potential for regulated features does exist (waters, wetlands and therefor hydric soils). The NWI, FEMA and USGS mapping do not show any potential regulated features on site, rather, those features do appear to exist adjacent to this property.

In conclusion, there are indications that regulated features, Waters, Wetlands and Hydric Soils, most likely exist within the project property boundaries, which would generally fall within the jurisdiction of the Army Corp of Engineers and the Pennsylvania Department of Environmental Protection. Any encroachment or impact to these features would require approval and/or permits from one or both of the agencies.

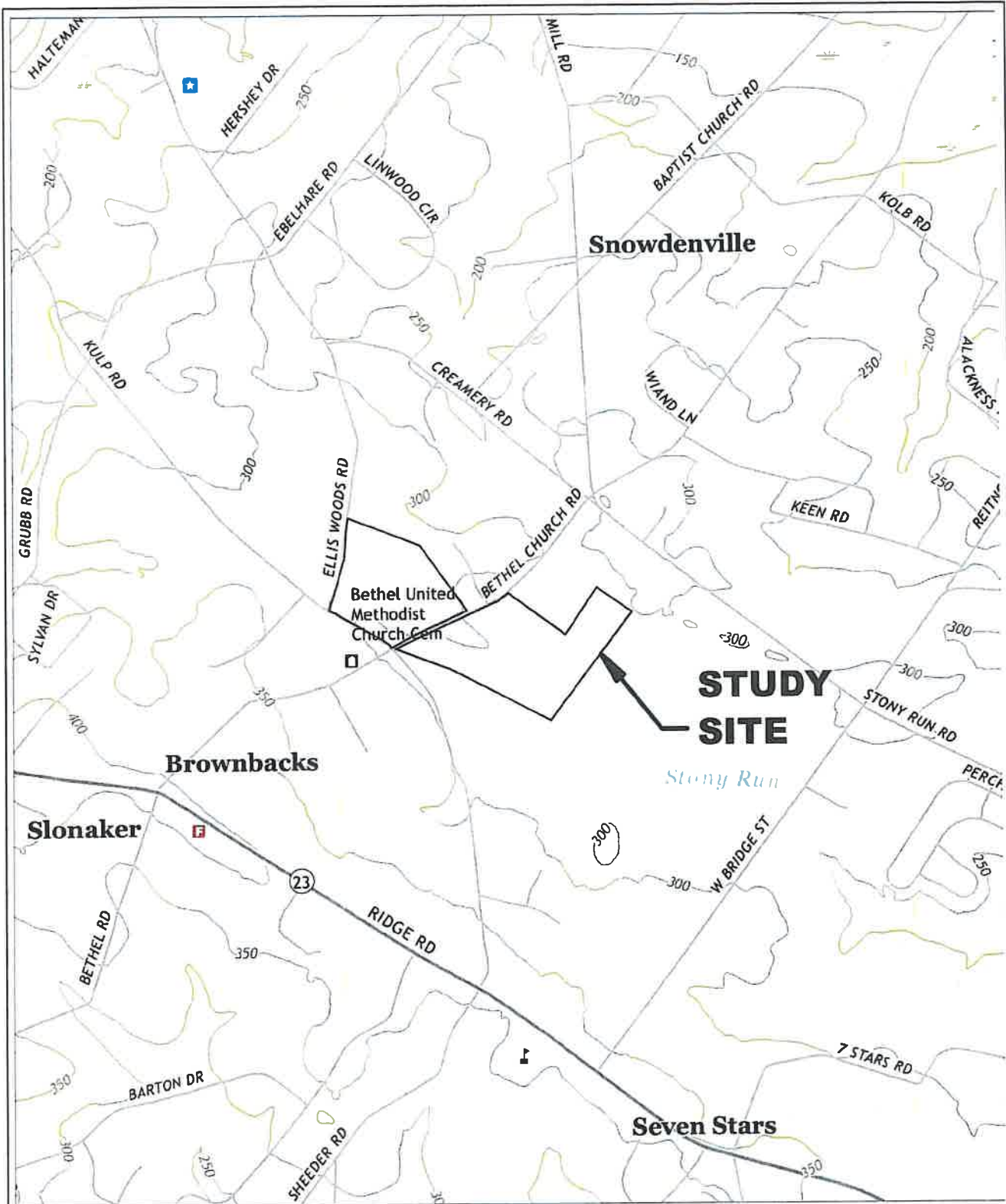
Please be aware that this determination is based on the availability and accuracy of on-line/desktop resources at the time of PTE's review.

Should you have any questions regarding this evaluation or our findings, please do not hesitate to call our office.

Sincerely;

Penn's Trail Environmental, LLC

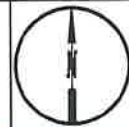
Maureen McDermott; Wetland Division Manager/Partner

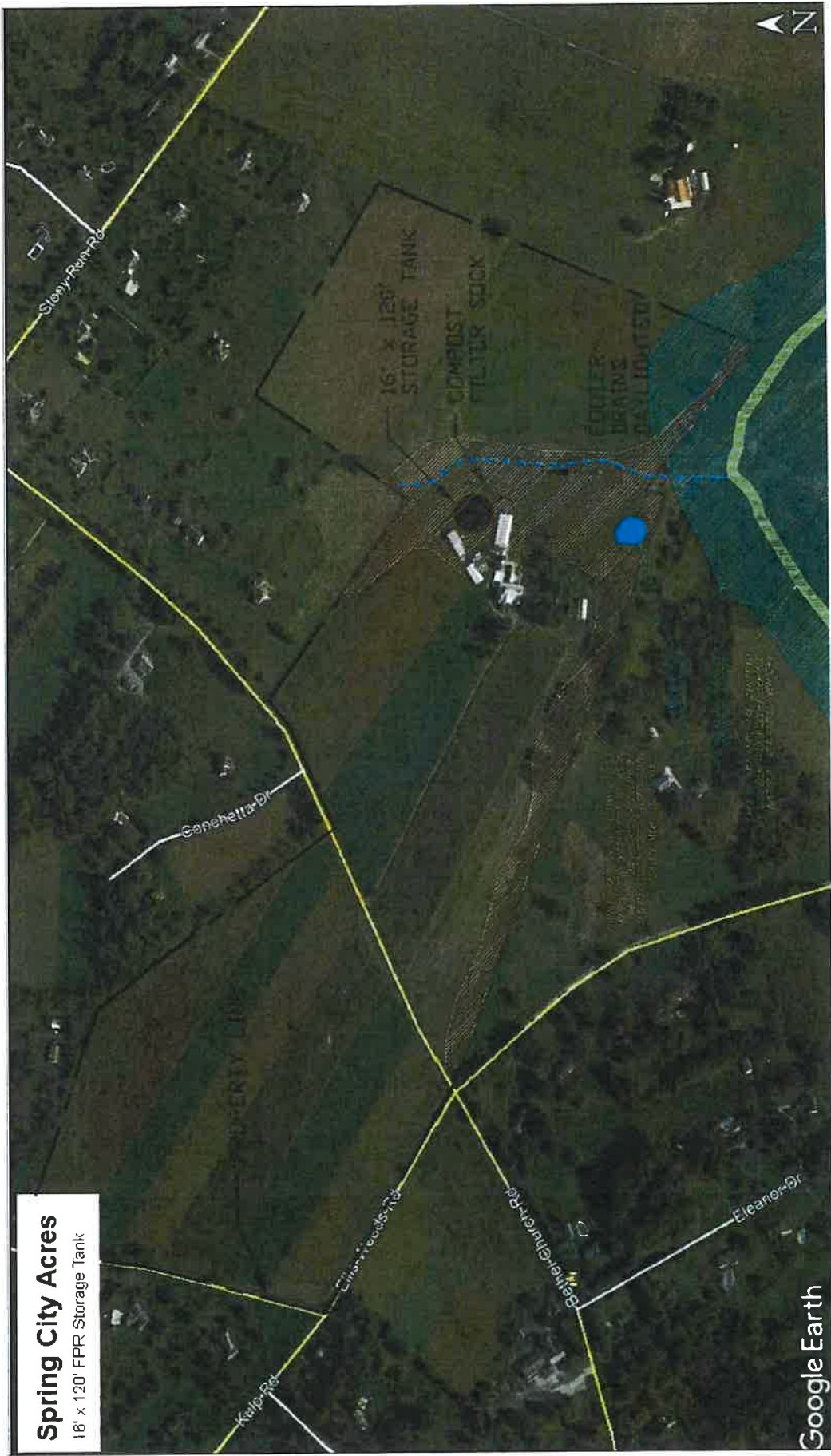


PT#46144
SHEET 1 OF 1

TOPOGRAPHIC SITE LOCATION MAP
PHOENIXVILLE PA QUADRANGLE, DATE: 2019
851 BETHEL CHURCH ROAD
E. COVENTRY TWP., CHESTER CO., PA
SCALE: 1" = 1,000'

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Spring City Acres
16' x 120' FPR Storage Tank

Google Earth

PTE 6144 851 Bethel Church Road

Google Earth view of general area of tank installation. view of Features PTE would consider potentially Regulated waters with wetland system associated

Legend

high-level of probability for regulated waters and/or wetlands

moderate-level of probability for regulated waters and/or wetlands



Google Earth



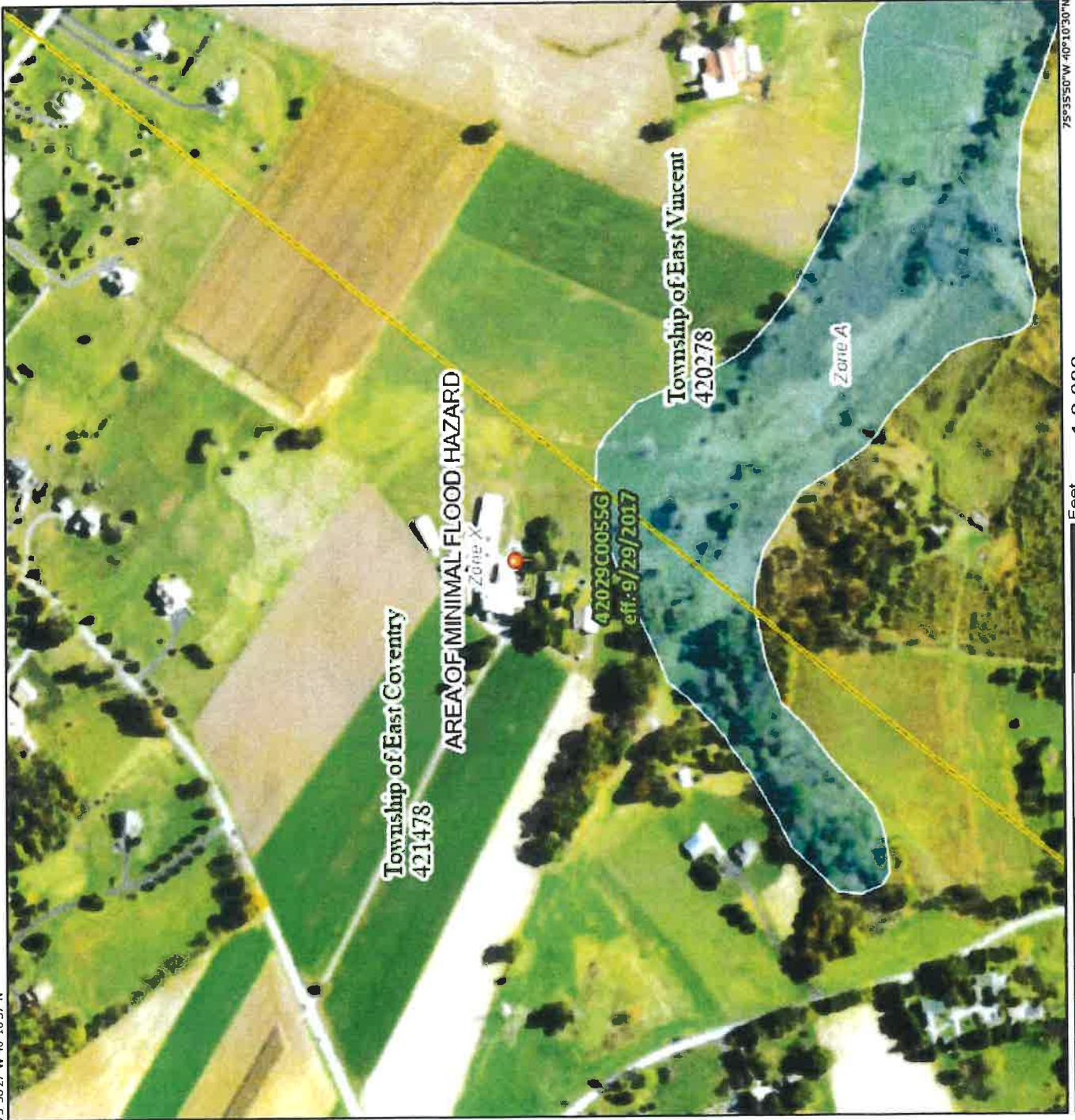
500 ft



National Flood Hazard Layer FIRMette



75°36'27"W 40°10'57"N



Legend

SEE THIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- SPECIAL FLOOD HAZARD AREAS**
- Without Base Flood Elevation (BFE) *Zone A, V, AE, AH, VE, AR*
 - With BFE or Depth *Zone AE, AO, AH, VE, AR*
 - Regulatory Floodway
 - 0.2% Annual Chance Flood Hazard. Area of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone 2*
 - Future Conditions 1% Annual Chance Flood Hazard *Zone X*
 - Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
 - Area with Flood Risk due to Levee *Zone B*
- OTHER AREAS OF FLOOD HAZARD**

- OTHER AREAS**
- Area of Minimal Flood Hazard *Zone X*
 - Effective LOMRs
 - Area of Undetermined Flood Hazard *Zone 2*
- GENERAL STRUCTURES**
- Channel, Culvert, or Storm Sewer
 - Levee, Dike, or Floodwall

- OTHER FEATURES**
- Cross Sections with 1% Annual Chance Water Surface Elevation
 - Coastal Transect
 - Base Flood Elevation Line (BFE)
 - Limit of Study
 - Jurisdiction Boundary
 - Coastal Transect Baseline
 - Profile Baseline
 - Hydrographic Feature

- MAP PANELS**
- Digital Data Available
 - No Digital Data Available
 - Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 12/7/2022 at 9:39 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.



























This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and undetermined areas cannot be used for regulatory purposes.





Hydric Rating by Map Unit—Chester County, Pennsylvania

MAP LEGEND

- Area of Interest (AOI)**
 - Area of Interest (AOI) 
- Soils**
 - Soil Rating Polygons
 - Hydric (100%) 
 - Hydric (66 to 99%) 
 - Hydric (33 to 65%) 
 - Hydric (1 to 32%) 
 - Not Hydric (0%) 
 - Not rated or not available 
- Soil Rating Lines**
 - Hydric (100%) 
 - Hydric (66 to 99%) 
 - Hydric (33 to 65%) 
 - Hydric (1 to 32%) 
 - Not Hydric (0%) 
 - Not rated or not available 
- Soil Rating Points**
 - Hydric (100%) 
 - Hydric (66 to 99%) 
 - Hydric (33 to 65%) 
 - Hydric (1 to 32%) 
 - Not Hydric (0%) 
 - Not rated or not available 
- Water Features**
 - Streams and Canals 
- Transportation**
 - Rails 
 - Interstate Highways 
 - US Routes 
 - Major Roads 
 - Local Roads 
- Background**
 - Aerial Photography 

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
 Web Soil Survey URL:
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Chester County, Pennsylvania
 Survey Area Data: Version 15, Sep 6, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Jun 3, 2022—Jul 20, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Hydric Rating by Map Unit

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
CyA	Croton silt loam, occasionally ponded, 0 to 3 percent slopes	85	19.3	18.0%
JoC	Joanna loam, 8 to 15 percent slopes	5	0.7	0.6%
PeB	Penn silt loam, 3 to 8 percent slopes	0	40.9	38.2%
PeC	Penn silt loam, 8 to 15 percent slopes	0	10.4	9.7%
ReA	Readington silt loam, 0 to 3 percent slopes	3	21.6	20.2%
ReB	Readington silt loam, 3 to 8 percent slopes	0	14.1	13.2%
Ro	Rowland silt loam	8	0.0	0.0%
Totals for Area of Interest			107.1	100.0%

Description

This rating indicates the percentage of map units that meets the criteria for hydric soils. Map units are composed of one or more map unit components or soil types, each of which is rated as hydric soil or not hydric. Map units that are made up dominantly of hydric soils may have small areas of minor nonhydric components in the higher positions on the landform, and map units that are made up dominantly of nonhydric soils may have small areas of minor hydric components in the lower positions on the landform. Each map unit is rated based on its respective components and the percentage of each component within the map unit.

The thematic map is color coded based on the composition of hydric components. The five color classes are separated as 100 percent hydric components, 66 to 99 percent hydric components, 33 to 65 percent hydric components, 1 to 32 percent hydric components, and less than one percent hydric components.

In Web Soil Survey, the Summary by Map Unit table that is displayed below the map pane contains a column named 'Rating'. In this column the percentage of each map unit that is classified as hydric is displayed.

Hydric soils are defined by the National Technical Committee for Hydric Soils (NTCHS) as soils that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part (Federal Register, 1994). Under natural conditions, these soils are either saturated or inundated long enough during the growing season to support the growth and reproduction of hydrophytic vegetation.

The NTCHS definition identifies general soil properties that are associated with wetness. In order to determine whether a specific soil is a hydric soil or nonhydric soil, however, more specific information, such as information about the depth and duration of the water table, is needed. Thus, criteria that identify those estimated soil properties unique to hydric soils have been established (Federal Register, 2002). These criteria are used to identify map unit components that normally are associated with wetlands. The criteria used are selected estimated soil properties that are described in "Soil Taxonomy" (Soil Survey Staff, 1999) and "Keys to Soil Taxonomy" (Soil Survey Staff, 2006) and in the "Soil Survey Manual" (Soil Survey Division Staff, 1993).

If soils are wet enough for a long enough period of time to be considered hydric, they should exhibit certain properties that can be easily observed in the field. These visible properties are indicators of hydric soils. The indicators used to make onsite determinations of hydric soils are specified in "Field Indicators of Hydric Soils in the United States" (Hurt and Vasilas, 2006).

References:

Federal Register. July 13, 1994. Changes in hydric soils of the United States.

Federal Register. September 18, 2002. Hydric soils of the United States.

Hurt, G.W., and L.M. Vasilas, editors. Version 6.0, 2006. Field indicators of hydric soils in the United States.

Soil Survey Division Staff. 1993. Soil survey manual. Soil Conservation Service. U.S. Department of Agriculture Handbook 18.

Soil Survey Staff. 1999. Soil taxonomy: A basic system of soil classification for making and interpreting soil surveys. 2nd edition. Natural Resources Conservation Service. U.S. Department of Agriculture Handbook 436.

Soil Survey Staff. 2006. Keys to soil taxonomy. 10th edition. U.S. Department of Agriculture, Natural Resources Conservation Service.

Rating Options

Aggregation Method: Percent Present

Component Percent Cutoff: None Specified

Tie-break Rule: Lower



U.S. Fish and Wildlife Service

National Wetlands Inventory

PTE 6144



December 7, 2022

Wetlands

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland

-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond

-  Lake
-  Other
-  Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

