



OFFICE OF THE MAYOR

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CITY OF SCRANTON
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340 North Washington Avenue
Scranton, Pennsylvania 18503

August 25, 2026

VIA EMAIL AND FIRST-CLASS MAIL

Pennsylvania Department of Environmental Protection Northeast Regional Office
Waterways and Wetlands Program Manager
2 Public Square
Wilkes-Barre, PA 18701-1915

Re: Request for Public Hearing on Draft NPDES Permit No. PAD350072 Applicant: PPL
Electric Utilities Corporation Project: Stanton Summit 1&2 69kV Line Rebuild Project
Authorization ID No. 1568921

Dear Program Manager:

On behalf of the City of Scranton, I am writing to ask the Department to hold a public hearing on the draft NPDES permit it has tentatively decided to issue to PPL Electric Utilities Corporation for stormwater discharges from the Stanton Summit 1 & 2 69 kV Line Rebuild Project. The City makes this request under 25 Pa. Code § 92a.82(d), which lets any interested person or government agency petition for a hearing on a draft NPDES permit, and which tells the Department to hold one when there is significant public interest. We are filing within the thirty-day comment period that runs after the draft-permit notice appears in the Pennsylvania Bulletin. As the rest of this letter explains, the City has a real and immediate stake in this permit, and the public interest here is significant.

Let me start with who we are and why this permit matters to us. This project runs right through Scranton. It disturbs 72.5 acres of ground along the corridor and sends construction stormwater into waters that flow through and along the City, including Keyser Creek, which the Commonwealth classifies as a cold-water fishery. The City is not a distant bystander raising general worries. We are the community that lives with the results if the erosion, sediment, and post-construction controls fall short. Pennsylvania law recognizes that a municipality has a substantial, direct, and immediate interest in protecting the environment inside its own borders, because whatever harms that environment harms the City itself. The Department has already acknowledged our stake by listing Scranton among the affected municipalities and copying the City on its July 29,



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2026 notice. That interest satisfies the requirement in § 92a.82(d) that a hearing request identify the interest of the party asking for it.

Stormwater is the heart of our concern. For years, Scranton has struggled with serious stormwater problems: streets and basements that flood, drainage systems that cannot keep up, and runoff that damages public and private property. The City has spent millions of dollars of public money to fix these problems and to meet its own stormwater obligations. A project that tears up 72.5 acres and discharges construction stormwater into the same waters that move through the City puts that investment at risk. Extra sediment, changed drainage patterns, and poorly controlled runoff can worsen the very flooding we have worked so hard, and paid so much, to bring under control. The Department cannot properly weigh those local, cumulative effects on a City that already carries a heavy stormwater burden without hearing directly from the City and its residents. A public hearing is the right place to build that record.

There is a second reason a hearing makes sense, and it comes straight from the Department's own review. In the July 29, 2026 Notice of Technical Deficiencies, the Department found a series of problems with the application that bear directly on our stormwater and water-quality concerns. The application leaves out the required NRCS soil map, which is basic information for judging erosion and runoff. A proposed concrete washout sits outside the project boundary. The post-construction stormwater plan does not adequately preserve stream channels or protect identified wetlands at several site plans. Sediment-control socks are not placed on level contours. At least one access point has no clear stabilized construction entrance. The application does not resolve a Pennsylvania Natural Diversity Inventory hit, and it lacks the required DCNR clearance. The plan set also contains georeferencing and labeling errors. The Department warned that these deficiencies voided the permit decision guarantee and, if left uncorrected, would push the application into Elevated Review. Under 25 Pa. Code § 92a.36, the Department may not issue an NPDES permit unless the application is complete and consistent with the law and with NPDES standards. Several of these open items go to the core of erosion, sediment, and stormwater control, which tells us the application is not ready for approval and that a hearing should examine whether this project, as proposed, can actually protect the City's waters and drainage systems.

A few related points deserve attention as well. The draft permit does not appear to account fully for the combined effect of the project's discharges on the specific streams that receive them, including any antidegradation protections that apply to those designated-use waters. Given the size of the disturbance, the terrain, and the sensitivity of the receiving streams, the proposed erosion and stormwater controls may not be enough. These are exactly the questions a public hearing is meant to surface, and they are questions on which the City and its residents hold local knowledge that the Department should have in front of it before it acts.



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All of this adds up to the significant public interest that § 92a.82(d) describes, and the rule instructs the Department to resolve any doubt in favor of holding the hearing. This project crosses several municipalities and touches several waterways that the public uses and values. Its scale, its documented application problems, and its direct effect on a community already fighting stormwater trouble are more than enough to warrant a hearing. Consistent with the regulation, we ask that the Department hold the hearing in the area of the proposed discharge, in or near Scranton, so that the residents most affected can attend and take part.

Finally, please treat this letter as a reservation of the City's rights as well as a request. The City intends to submit written comments on the draft permit during the comment period, and it reserves the right to supplement those comments and this request, to participate fully in any hearing the Department schedules, and to pursue any further review available to it, including an appeal to the Environmental Hearing Board of any final action on this permit.

Thank you for considering this request. Please send any correspondence about it, and notice of any scheduled hearing, to me and to the City Solicitor's Office. We look forward to taking part in the hearing.

Respectfully submitted,

Paige G. Cagnetti,
Mayor, City of Scranton