

January 9, 2026

EBWT 1006

Luke Reven, Township Manager  
East Brandywine Township  
1214 Horseshoe Pike  
Downingtown, PA 19335-1153

**RE: Applecross Community  
Financial Security Releases**

Dear Luke:

The Township has received the attached request for the release of multiple bonds related to this community. While our firm was not the Township Engineer during this project, per prior and ongoing coordination and discussions with Township staff, the Township Solicitor and project representatives, we concur that it has been the intent of the Township to release these bonds pending completion of *PADEP NPDES* permitting, specifically receipt of the *Notice of Termination (NOT)*.

We have worked at length with project representatives, community representatives and the Chester County Conservation District for several years regarding remediations and repairs necessary such that the NOT could be issued, which it was on October 22, 2025 (attached). Note Pennoni was present for final site observations prior to the NOT issuance.

Further, it is our understanding that signal-related improvements continue to be coordinated separately under the auspices of a *PENNDOT Highway Occupancy Permit (HOP)*.

**Therefore, we have no objections to release of the bonds noted, pending any remaining administrative items or costs have been satisfactorily resolved.**

Should you have any questions or comments, please contact the undersigned.

Sincerely,

**PENNONI**



Nathan M. Cline, PE  
Township Engineer



October 21, 2025

**VIA CERTIFIED MAIL**

Mr. Luke Reven  
Township Manager  
East Brandywine Township  
1214 Horseshoe Pike  
Dowington, PA 19335

**Re: Applecross Community**

Dear Mr. Reven:

At this time, Pulte Homes has completed all of the bonded improvements for the above referenced neighborhood. As a result, we request that our Performance Bond No.'s 268000465, 150704, 150703 and 166378 and Cash Guarantees be returned.

All correspondence relating to this request should be sent to:

Ann Marie Maharg  
PulteGroup, Inc. – Northeast Corridor Division  
750 US Route 202, Suite 500  
Bridgewater, NJ 08807

If you have any questions or need additional information, please feel free to contact Bob Hermley (Land Development Manager) at (215) 852-1908 or me at (908) 848-2041. Thank you for your attention to this matter.

Sincerely,

  
Ann Marie Maharg  
Sr. Mgr. DRE/HOA

cc: Emily Albert, Township Treasurer, via email  
Nathan M. Cline, Pennoni, via email  
Robert Hermley





CHESTER COUNTY  
CONSERVATION DISTRICT

*Conserving Natural Resources for Our Future*

October 22, 2025

Pulte Homes  
Attn: Bill Creeger  
1210 Northbrook Road, Suite 260  
Trevose, PA 19053  
Bill.creeger@pultegroup.com

Re: Notice of Termination Approval Letter  
Applecross Country Club  
Permit No. PAI011505069  
East Brandywine Twp, Chester County

To Whom it May Concern:

The Chester County Conservation District received a Notice of Termination (NOT) form for the above-referenced project as required by 25 Pa. Code § 102.7. A final site inspection was conducted of the project site on 10/21/25 and a copy of the Chapter 102 Inspection Report form is attached to this letter.

The Chester County Conservation District acknowledges that you have satisfied the regulatory requirements at 25 Pa. Code §§ 102.7 and 102.22(a)(1) and the NOT is hereby approved.

Please note that the person(s) identified in Section 5 of the NOT is now responsible for the long-term operation and maintenance of the PCSM SCMs implemented under the approved PCSM Plan.

If you have questions, please contact me by e-mail at [jsofranko@chesco.org](mailto:jsofranko@chesco.org) or by telephone at 610-455-1383.

Sincerely,

Joe Sofranko  
Resource Conservationist  
Chester County Conservation District

cc: Ron Jackson  
DEP Permits Section Chief  
East Brandywine twp

Enclosure: Final Chapter 102 Inspection Report





# CHAPTER 102 INSPECTION REPORT

## CHESTER CONSERVATION DISTRICT

Permit No.: PAI011505069

Report No.: 2025-94

Save as PDF

Clear Report

### GENERAL INFORMATION

Project/Site Name:	<u>Applecross Country Club</u>	Permit Issuance Date:	<u>12/14/2011</u>
Site Address:	<u>Bollinger Road</u>	Permit Expiration Date:	<u>12/14/2016</u>
Site City, State, ZIP:	<u>Downingtown PA 19335</u>	Permit Type:	<u>NPDES IP</u>
RP/Permittee Name:	<u>Pulte Group- Bill Creeger</u>	Site Municipality(ies):	<u>East Brandywine Twp</u>
RP/Permittee Address:	<u>1210 Northbrook Road Ste 260</u>	Site County(ies):	<u>Chester</u>
RP/Permittee City, State, ZIP:	<u>Treose PA 19053</u>	Earth Disturbance:	<u>128.00</u> acres
RP/Permittee Email:	<u>bill.creeger@pultegroup.com</u>	Site Latitude:	_____
Surface Water(s):	<u>Beaver Creek, Culbertson Run</u>	Site Longitude:	- _____
Special Protection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Complaint Inspection?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Construction Stage:	<u>Permanently Stabilized (NOT)</u>	Activity:	<u>Construction &gt;= 1 ac</u>
Construction Sequence #:	_____	Weather:	<u>Cloudy</u>
Date Earth Disturbance Commenced:	_____	Tax Parcel ID(s):	_____

Operator Name	Operator Company	Operator Email	Operator Phone

### INSPECTION INFORMATION

Inspection Date:	<u>10/21/2025</u>	Inspection Time:	<u>1:00</u> <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM
Lead Inspector Name:	<u>Joe Sofranko</u>	Inspector Email:	<u>jsofranko@chesco.org</u>
Inspector Title:	<u>Resouce Conservationist</u>	Inspector Phone:	<u>610-455-1383</u>
Other Attendee(s):	_____	Photographs Attached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Was a representative of the project or permittee on-site during the inspection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Representative Name:	<u>Matt Gilrain, Ron Jackson</u>	Email:	_____
Representative Company:	_____	Phone:	_____
Type of Inspection:	<input type="checkbox"/> Initial <input type="checkbox"/> Follow-up (Previous Report #2022-93) <input checked="" type="checkbox"/> Final (NOT)		

Brief description of the site and summary of observations:

Matt McAloon from Pennoni on behalf of East Brandywine Township was present for this inspection.

This is the final NOT inspection.

The basins noted from the the 2022 inspection have been addressed/ maintained and stabilization is good. The remaining silt fence had been removed.

The engineer updated the Notice of Termination sign off.

The NOT is approved and the NPDES permit is terminated.

<b>INSPECTION FINDINGS</b>	
	<input checked="" type="checkbox"/> No violations observed at this time.
a.	<input type="checkbox"/> Failure to implement and/or maintain E&S BMPs for earth disturbance (§§ 102.4(b)(1), 102.22(a)(1)).
b.	<input type="checkbox"/> Failure to develop and/or implement a written E&S Plan (§ 102.4(b)(2)).
c.	<input type="checkbox"/> Failure to have a person trained and experienced in E&S control methods develop an E&S Plan (§ 102.4(b)(3)).
d.	<input type="checkbox"/> Failure to have the E&S Plan and/or inspection/monitoring reports on-site and available for review (§ 102.4(b)(8)).
e.	<input type="checkbox"/> Failure of permittee to obtain all necessary approvals/permits from DEP/CCD prior to commencing earth disturbance (§ 102.4(d)).
f.	<input type="checkbox"/> Failure to hold a pre-construction meeting and/or invite DEP/CCD staff and/or provide at least 7 days' notice (§ 102.5(e)).
g.	<input type="checkbox"/> Failure of an operator to submit a co-permittee acknowledgement form (CSL § 402(b)).
h.	<input type="checkbox"/> Failure to prepare and/or implement and/or provide upon request a PPC Plan when required (§ 102.5(l)).
i.	<input type="checkbox"/> Failure to temporarily stabilize areas where there will be a cessation of earth disturbance activities for at least 4 days (§ 102.22(b)).
j.	<input type="checkbox"/> Failure to complete or accurately complete visual site inspections as required by the permit, including color photographs (CSL § 402(b)).
k.	<input type="checkbox"/> Failure to implement PCSM BMPs (SCMs) as specified in the approved PCSM Plan (§ 102.8(a)).
l.	<input type="checkbox"/> Failure to operate and maintain PCSM BMPs (SCMs) as specified in an approved PCSM Plan (§ 102.8(a)).
m.	<input type="checkbox"/> Failure to have the PCSM Plan, inspection reports, and/or monitoring records available for review (§ 102.8(j)).
n.	<input type="checkbox"/> Failure to have a licensed professional or a designee present on-site during critical stages of PCSM BMPs (SCMs) (§ 102.8(k)).
o.	<input type="checkbox"/> Failure to record an instrument for PCSM BMPs (SCMs) (§ 102.8(m)(2)).
p.	<input type="checkbox"/> Failure to meet riparian forest buffer criteria (§ 102.14(b)).
q.	<input type="checkbox"/> Failure to permanently stabilize a project site or any phase or stage thereof (§ 102.22(a)).
r.	<input type="checkbox"/> Failure to remove temporary E&S BMPs once permanent stabilization has been established (§ 102.22(a)(1)).
s.	<input type="checkbox"/> Failure to obtain NPDES permit prior to commencing earth disturbance activity with at least one acre of disturbance (§ 102.5(a)).
t.	<input type="checkbox"/> Failure to obtain E&S permit prior to commencing earth disturbance activity with at least 25 acres of disturbance for timber harvesting and road maintenance (§ 102.5(b)).
u.	<input type="checkbox"/> Failure to obtain E&S permit prior to commencing earth disturbance activity with at least 5 acres of disturbance for oil and gas activities (§ 102.5(c)).
v.	<input type="checkbox"/> Failure of activity not requiring a permit to comply with Chapter 102 requirements (§ 102.5(k)).
w.	<input type="checkbox"/> Failure to follow the approved construction sequence in an E&S or PCSM Plan (CSL § 402(b)).
x.	<input type="checkbox"/> Failure to submit a Notice of Termination (NOT) (§ 102.7(a)).
y.	<input type="checkbox"/> Unauthorized discharge of polluting substances to waters of the Commonwealth resulting in pollution (CSL § 401).
z.	<input type="checkbox"/> Failure to comply with the terms and conditions of a permit or order (CSL § 402(b)).

aa.	<input type="checkbox"/>	Failure to remove building materials and/or wastes from the site for recycling or disposal in accordance with DEP regulations as required by the permit (CSL § 402(b)).
bb.	<input type="checkbox"/>	Failure to comply with DEP regulations or the Clean Streams Law (CSL § 611).
cc.	<input type="checkbox"/>	Failure to take necessary measures to prevent pollutants from reaching waters of the Commonwealth (§ 91.34(a)).
dd.	<input type="checkbox"/>	Failure to notify DEP of new or expanded earth disturbance not identified in an NPDES permit application (§ 92a.24(b)).
ee.	<input type="checkbox"/>	Failure to notify and/or obtain authorization from DEP/CCD for changes to NPDES permitted activities (§ 92a.41(a)(12)).
ff.	<input type="checkbox"/>	Failure to minimize the extent and duration of the earth disturbance, maximize protection of existing drainage features and vegetation, and/or minimize soil compaction (§ 102.4(b)(4)).
gg.	<input type="checkbox"/>	Failure to provide notification to DEP/CCD in writing at least 3 days prior to commencing bulk earth disturbance activities as required by the permit (CSL § 402(b)).
hh.	<input type="checkbox"/>	Failure to submit a complete SCM Construction Certification Form within 30 days of the completion of SCM construction as required by the permit. (CSL § 402(b)).
ii.	<input type="checkbox"/>	Failure to submit a complete New Property Owner Notification Form to DEP/CCD for any property containing a PCSM SCM within 30 days of sale as required by the permit (CSL § 402(b)).
jj.	<input type="checkbox"/>	Failure to submit a complete annual report to DEP/CCD by the deadline established in the permit (CSL § 402(b)).
kk.	<input type="checkbox"/>	Failure of the permittee to use a qualified inspector for visual site inspections as required by the permit (CSL § 402(b)).
ll.	<input type="checkbox"/>	Other:
	<input type="checkbox"/>	During the inspection violations of Chapter 105 were observed and are identified in a separate Chapter 105 inspection report.
	<input type="checkbox"/>	E&S BMPs were evaluated and appear to be functioning as designed.
	<input type="checkbox"/>	PCSM SCMs were evaluated and appear to be functioning as designed. <input type="checkbox"/> Form 3800-FM-BCW0531a was used to document the PCSM SCM evaluation.
	<input type="checkbox"/>	There is a need for modifications to the E&S Plan, PCSM Plan, or permit coverage. Describe:
		Date Latest Annual Report Received: _____

**COMPLIANCE ASSISTANCE RECOMMENDATIONS**

**ADDITIONAL COMMENTS**

**NOTICE AND SIGNATURES**

*This report is official notification that a representative of the Department of Environmental Protection (DEP) has conducted an inspection of your earth disturbance activity to determine compliance with 25 Pa. Code Chapter 102 and the Pennsylvania Clean Streams Law. This representative may be an employee of a County Conservation District (CCD), which by delegation agreement with DEP is authorized to investigate complaints, inspect earth disturbance activities and conduct compliance actions. Any violations observed by DEP/CCD have been noted in this report and constitute unlawful conduct as defined in Section 611 of the Clean Streams Law. Failure to take corrective actions to resolve the violations may result in administrative, civil and/or criminal penalties being assessed by DEP as specified at Section 602 of the Clean Streams Law. The Clean Streams Law provides for up to \$10,000 per day in civil penalties, up to \$10,000 in summary criminal penalties, and up to \$25,000 in misdemeanor criminal penalties for each violation. This report does not constitute an Order or appealable action of DEP. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. For further information or assistance contact the DEP/CCD inspector.*

*The Project Site Representative's signature acknowledges that they have read the report and were given an opportunity to discuss the report with the inspector. The signature does not necessarily mean the signee agrees with the report. All comments by the inspector are based on visual site observations and do not constitute professional practice under applicable law.*

- This report serves as a Compliance Notice (CN).                       This report serves as a Notice of Violation (NOV).  
 A follow-up inspection will occur on or about:   N/A

_____	_____	<b>Joe Sofranko</b>	10/22/2025
Site Representative Signature	Date	Inspector Signature	Date

cc: **Sent to RP and CC list via email only**  
**East Brandywine Twp, Matt Gilrain, Ron Jackson, Pennoni Assoc**