

July 11, 2017

Ms. Roberta Zwier
Transcontinental Gas Pipe Line Company, LLC
2800 Post Oak Boulevard, Level 6
Houston, Texas 77056

Re: Technical Deficiency #3
Atlantic Sunrise Pipeline Columbia County
APS ID# 878953, AUTH ID# 1087339
DEP Application No. E19-311
Cleveland, Greenwood, Franklin, Jackson, Montour, Mt. Pleasant, Orange, Hemlock and Sugarloaf
Townships
Columbia County

Dear Ms. Zwier:

On February 24, 2017 the Department of Environmental Protection (Department) sent to Transcontinental Gas Pipe Line Company, LLC (Transco) a technical deficiency letter for the above referenced Project. The Department received a response to that technical deficiency letter on May 5, 2017, and determined that the application, including the resubmission, continues to be technically deficient. The Pennsylvania Dam Safety and Waterway Management Regulations, 25 Pa. Code 105.1, *et seq.*, (Chapter 105 Regulations) include information that will aid you in responding to some of the deficiencies listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth the Department's preferred means of satisfying the applicable regulatory requirements. Any public comments that raise issues not addressed in this letter may require additional responses.

The Department has identified specific examples of deficiencies in the permit application(s) addressed in this letter. It is recommended that Transco evaluate all applications for similar deficiencies to assure accuracy and consistency.

Technical Deficiencies

1. DEP review of the provided technical information found inconsistencies relative to identified resources in various reports, tables and narratives. For example, resource identification numbers may be associated with multiple stream names in different watersheds. Please review all technical drawings, narratives, support documents, and calculations to assure that identified resources, temporary impacts, permanent impacts, and technical information are consistently reported. Provide DEP with the appropriate revisions to the application. [25 Pa. Code §105.13(e)]

2. DEP review of the provided Attachment "D", Summary of Pennsylvania Historical and Museum Commission (PHMC) Coordination, revealed a recent submission of April 21, 2017, to further evaluate the remaining portions of the Phase I survey. Provide the subsequent PHMC coordination evaluations and clearance documentation associated with the April 21, 2017 submission. Review all technical drawings, narratives, support documents, and calculations to assure that identified resources, temporary impacts, and permanent impacts are consistently identified and reported in the application. [25 Pa. Code §105.13(e)(1)(x)]
3. The Plan Sheet numbering system as found in the Impact Tables does not match the Plan Sheet Drawing numbers in the Access Road plan set. For Example: Northumberland County Impact Table Number 24-1600-70-09-A/AR-NO-078.1-01 does not match Plan Drawing No. 24-1600-70-28-A/LL113_9-AR-NO-078.1. The Lebanon County Section "E" impact number 281 Plan Sheet numbering system does not match the Access Road Plan Set. Inconsistencies like this have also been found in Lebanon, Columbia and Northumberland Counties. Review all technical drawings, narratives, support documents, and calculations to assure that identified resources, temporary impacts, and permanent impacts are consistently identified and reported. Provide DEP with the appropriate revisions to the application. [25 Pa. Code §105.13(e)]
4. It appears that a one foot (1') roadway depth has been used for all access roads as found in the Section "E" Impact Tables Floodway Fill Column. This includes those access roads that are utilizing existing roadways. Typical Section A, as found in the Access Road Plan Set, details six inches (6") of aggregate on top of the existing roadways. Access Roads along existing roadways contain a note stating that the existing roadway will be used during construction. These roadways therefore, have no proposed roadway section provided and the note explains that the surface shall be maintained as needed with AASHTO # 57 stone in areas that show signs of erosion. It is unclear how the fill quantities were calculated, how they will be distributed throughout the floodways and which section if any should be used to construct the roadways. Example; Access Road AR-LE-050.3-01; Section "E" Impact tables detail 8,051.13 cu yds. of fill in the floodway of Forge Creek (WW-T40-6002), Attachment H-2 Document tables detail 8,051.3 cu yds. of fill in the floodway of Forge Creek (WW-T40-6002), Layout Plans For Access Roads state that the existing roadway will be used, with no cross sections provided. Review all technical drawings, narratives, support documents, and calculations to assure that identified resources, temporary impacts, and permanent impacts are consistently identified and reported in the application. Provide DEP with the appropriate revisions. [25 Pa. Code §105.13(e)]
5. Attachment G-1 is a county-specific Pennsylvania Natural Diversity Index (PNDI) summary. The summary provided references and includes all information for Northumberland County. Provide a PNDI summary that is specific to Columbia County. [25 Pa. Code §105.13(e)(1)(x)]
6. Attachment H-3 shows contingency plan impact mapping for the Susquehanna River to be used if the Horizontal Directional Drilling (HDD) is not successful. Provide mapping for impacts to wetland W-T04-12001C under the contingency plan. [25 Pa. Code §105.13(e)(1)(i)(C)]


7. Table 3 in Attachment H-2 on Drawing Number 24-1600-70-28A/LL113_9-BMP-CO-TB, Sheet 2 of 6, lists crossing windows for stream crossings in Columbia County. Stocked trout in-stream restrictions from March 1 to June 15 were not taken into consideration in the table. Adjust the table to remove March 1 to June 15 from the crossing window for Stocked Trout streams and any areas within 0.5 miles of a stocked trout stream. [25 Pa. Code §105.13(e)]

Pursuant to 25 Pa. Code § 105.13a of the Chapter 105 Regulations you must submit a response fully addressing each of the significant technical deficiencies set forth above. Please note that this information must be received within sixty (60) calendar days from the date of this letter, on or before September 9, 2017 or the Department may consider the application to be withdrawn by the applicant. You may request a time extension, in writing, before September 9, 2017 to respond to deficiencies beyond the sixty (60) calendar days. Requests for time extensions will be reviewed by the Department and considered. You will be notified in writing of the decision either to grant or deny, including a specific due date to respond if the extension is granted. Time extensions shall be in accordance with 25 Pa. Code § 105.13a(b).

If you believe that any of the stated deficiencies are not significant, or that you have already addressed them sufficiently in a previous submission, instead of submitting a response to that deficiency, you have the option of asking the Department to make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. If you choose this option with regard to any deficiency, you should explain and justify how the stated deficiencies are not significant, or state specifically where in a previous submission they were addressed. Please keep in mind that if you fail to respond, your application may be withdrawn or denied.

Should you have any questions regarding the identified deficiencies, please contact George Grose at 570-988-5504, and refer to Application No. E19-311, to discuss your concerns or to schedule a meeting. The meeting must be scheduled within the 60 day period allotted for your reply, unless otherwise extended by the Department. You may also follow your application through the review process via eFACTS on the Web at:
<http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,



James A. Kuncelman, P.E.
Chief, Permits Section
Waterways and Wetlands Program

cc: Mr. Michael Dombroskie/US Army COIPS of Engineers, Baltimore District
Ms. Jamie Davis/US Environmental Protection Agency
Mr. John Zimmer, TRC Environmental
Mr. Aaron Blair/Transcontinental Pipe Line Company, LLC
PA Fish and Boat Commission, Division of Environmental Services
Columbia County Conservation District

Transcontinental Gas Pipe
Line Company, LLC

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July 11, 2017
E19-311

Cleveland Township
Greenwood Township
Franklin Township
Jackson Township
Montour Township
Mt. Pleasant Township
Orange Township
Hemlock Township
Sugarloaf Township

JAK/GG/LAR