

July 11, 2017

Ms. Roberta Zwier
Transcontinental Gas Pipeline Company, LLC
2800 Post Oak Boulevard, Level 6
Houston, TX 77056

Re: Technical Deficiency #3
Atlantic Sunrise Central Penn Pipeline South Project
APS ID# 880147, AUTH ID# 1089687
DEP Application No. E36-947
Conestoga, Drumore, East Donegal, Eden, Manor, Martic, Mount Joy, Pequea, Rapho and West
Hempfield Townships
Mount Joy Borough
Lancaster 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, a review of the various access road site plans for AR-LA-009.1 identified the unnamed tributary to Pequea Creek as WW-T65-001. Conversely, it appears that Attachment E-2 PA DEP Impact Table (Impact #252) and Attachment H-2 Stream Disturbance for Access Road AR-LA-009.1 identified that same watercourse as WW-T31-003 or Pequea Creek. Please review all technical drawings, narratives, support documents, and calculations to assure that the identified resources, temporary impacts,

permanent impacts, and technical information are consistently reported. Provide DEP with the appropriate revisions. [25 Pa. Code §105.13(e)]

2. DEP review of listed watercourse Chapter 93 water quality designations in various technical information provided found inconsistencies when cross-checking those reported Chapter 93 designations with 25 Pa. Code § 93.9o. Drainage List O (Susquehanna River). For example, a cross-check review of the Chapter 93 classification reported in Attachment E-2 PA DEP Impact Table for Brubaker Run (WW-T31-3005), indicated it was listed as TSF, MF, whereas a cross-check of 25 Pa. Code § 93.9o found Brubaker Run listed as WWF, MF. Indian Run (WW-T36-1007) was also reported being WWF, MF, whereas § 93.9o found Indian Run listed as TSF, MF. Please review all technical information, drawings, narratives and support documents to assure that the technical details being reported are accurate and consistent. Provide DEP with the appropriate revisions to the application. [25 Pa. Code §105.13(e)]
3. DEP cross-check review of the provided Attachment H-2 County Specific Impact Mapping with Access Road E&S Plans found existing structures were not consistently identified. For example, Attachment H-2 County Specific Impact Mapping (Drawing #24-1600-70-09-A/AR-LA-030-01) identified an existing road crossing of Shells Run (WW-T25-4002) as being constructed with a 15-inch diameter concrete culvert, whereas Access Road E&S Plans (Drawing #24-1600-70-09-A) for Access Road AR-LA-030 identified the same existing road crossing being constructed with a bridge. Please review all technical drawings, narratives, support documents, and calculations to assure that the identified resources, temporary impacts, and permanent impacts are consistently identified in the application. Provide DEP with the appropriate revisions to the application. [25 Pa. Code §105.13(e)]
4. DEP review of the provided technical information for floodway fill volumes found such volumes were not consistently reported in various reports, tables and narratives. For example, Attachment E-2 PA DEP Impact Tables (Impact #254) listed that 129.25-cubic yards of floodway fill will be placed, temporarily, for Access Road AR-LA-020 across an unnamed tributary to Strickler Run (WW-T25-2001), whereas the floodway fill volume was not reported in the corresponding Attachment H-2 County Specific Impact Mapping (Drawing #24-1600-70-09-A/AR-LA-020-01) for that same access road. Please review all technical drawings, narratives, support documents, and calculations to assure that the 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)]
5. DEP cross-check review of the technical information provided in Attachment H-2 County Specific Impact Mapping with the Access Road E&S Plan raised questions about how floodway fill volumes (although most are temporary) reported in Attachment H-2 correlated to the specified "typical roadway section" reported in corresponding Access Road E&S Plans. For example, Attachment H-2 (Drawing #24-1600-70-09/AR-LA-030-01) reported 499.08-cubic yards of floodway fill, whereas the respective Access Road E&S Plan did not specify any "typical roadway section" to be constructed. The Access Road E&S Plan only specified minimal floodway fill to existing roadway which does not correlate or explain 499-cubic yards of floodway fill referred to in Attachment H-2. Please evaluate all technical drawings, narratives, support documents, calculations, construction specifications to assure that the technical

information consistently, concisely correlates in all various plan sets and tables. Provide DEP with the appropriate revisions to the application. [25 Pa. Code §105.13(e)]

6. DEP review of Attachment H-2 County Specific Impact Mapping with the proposed activities listed in Attachment E-2 PA DEP Impact Tables found mapped impacts were not consistently listed. For example, Attachment H-2 (Drawing #24-1600-70-09-A/8.00-01) depicted instream and floodway activities associated with surface water withdrawals, whereas under the water withdrawal section in the Attachment E-2 tables, this impact was not listed. Please evaluate all technical drawings, narratives, support documents, calculations, construction specifications to assure the technical information consistently and concisely correlates in all various plan sets and tables. Provide DEP with the appropriate revisions to the application. [25 Pa. Code §105.13(e)]
7. DEP cross-check review of the provided cultural resources evaluations with the subsequent Pennsylvania Historical and Museum Commission (PHMC) correspondence found one identified potential archeologic site and four above-ground historic sites that may require cultural resource evaluation clearance. Referenced in the PHMC March 22, 2017 correspondence, review staff understood Archeologic Site ID 36LA1535 could be under PHMC review. Review of Attachment D-1 (Table D-4) identified above-ground sites BHP Key #862287, BHP Key #862260, No BHP Key- Like Cemetery, and BHP Key #862288 which suggested PHMC coordination was pending. However, no PHMC documentation relative to these four above-ground sites was found. If PHMC correspondence for the archeological site and four above-ground sites was provided to DEP in your May 2107 submission or as follow-up addendum, please provide DEP with direction as to where to locate this necessary PHMC documentation. If these cultural resources are under PHMC review, please acknowledge that this agency review is ongoing and provide DEP with copies of the PHMC final clearance letters. [25 Pa. Code §105.13(e)(1)(x)]
8. Section L-5 Appendix L-2 Riparian Area Impact Assessment and Restoration Plan, Appendix B Tree and Shrub Planting List appears to reference the Department's Riparian Forest Buffer Guidance; however, your list does not include the "Comments" column as shown in the Department's Guidance which details species susceptibility to insects and disease. Please be sure to evaluate these potential impacts to plantings when designing your replanting plan and revise the application as appropriate. [25 Pa Code § 105.13(e)]
9. The Hibred Farms Permittee Responsible Mitigation Plan (PRMP) includes three wetland and stream crossings that are referenced as "HIBRED FARMS PLAN, SHEET 4" in Attachment E-2 PA DEP Impact Table. Please revise the Plans to clearly identify crossings one through three. [25 Pa. Code § 105.13(e)(1)(i)(C)]

Also, it appears that rock fill is planned to construct or augment agricultural crossings within the mitigation area. If the wetland and stream crossings identified on the Plans are intended to represent the existing agricultural crossings identified on Sheet 4, please explain why there is a need to impact these resources by placing fill if there will be no further agricultural activities in the mitigation area. [25 Pa. Code § 105.13(e)(1)(ix)]


10. The PRMP Section 3.0 Site Selection references tile draining. Please explain proposed mitigation measures that are intended to address historic tile drains in the proposed mitigation area. [25 Pa. Code § 105.13(e)(1)(ix)]
11. Notes on Sheet 06 – 01 of the PRMP stated rock size is inconsistent with rock size identified in Attachment E-2 PA DEP Impact Table. Please clarify or revise the application as appropriate. [25 Pa. Code § 105.13(e)]
12. Please ensure that the Monitoring Requirements described in Section 10 of the PMRP meet, at a minimum, the monitoring guidelines found in the Department's "*Design Criteria for Wetlands Replacement*". [25 Pa. Code § 105.20a.(b)]

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 either Darrell Smeal at (814) 342-8139 or Jay Maneval at (570) 327-3765, and refer to Application No. E36-947, 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: US Army Corps of Engineers, Baltimore District, Michael Dombroskie
US Environmental Protection Agency, Jamie Davis
John Zimmer, TRC Environmental
Aaron Blair, TGPC, LLC
Lancaster CCD
PA Fish and Boat Commission, Division of Environmental Services
Conestoga Township
Drumore Township
East Donegal Township
Eden Township
Manor Township
Martic Township
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Mount Joy Township
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