

Re: Technical Deficiency Notification #2  
Water Obstruction & Encroachment Permit  
Schuylkill River Horizontal Directional Drilling Project  
DEP Application No. E1583223-013  
APS ID No. 1091837; AUTH ID No. 1445595  
Spring City Borough, Chester County  
Upper Providence Township, Montgomery County

#### Technical Deficiencies

1. Please upload the entire updated permit package for file storage. In the previous submission some files, such as the EA, did not contain all the attachments from the first submission. [25 Pa. Code §§105.21(a)(1)]

The entire EA has been provided.

2. In accordance with 25 Pa. Code § 78a.68a(i), when an IR or *loss of circulation* is discovered, the IR or loss of circulation should be immediately reported to the Department. Please revise documents accordingly. [25 Pa. Code § 78a.68a(i)]

The notification requirement has been added to the E&S plan (sheets 2 and 3, Note 5) and to the HDD Contingency Plan (Section 3.3.1).

3. The EA states, "The excavated trench will be backfilled, and clean fill added as needed to reach existing grade." Please note, restored streams shall use a minimum of twelve (12) inches of native stream bed material and the size and type of clean fill should be identified. Please provide a cross section or detailed drawing of the proposed backfilled trench clearly depicting the types and depths of the substrate material. [25 Pa. Code §§105.21(a)(1)]

A cross section drawing of the proposed backfilled trench within the Schuylkill River has been added to the HDD plans (Streambed Trench detail).

4. Please include notes in the E&S plans that include language from the PFBC letter including a) all dewatering activities of the Schuylkill River shall be conducted under the supervision of a Northern Red-bellied Cooter qualified biologist and b) herpetologist that is qualified/recognized to survey for the Northern Red-bellied Cooter should be on-site to clear the area of turtles prior to fence installation and to insure that the fence is placed in appropriate habitat. [25 Pa. Code §§105.21(a)(1) and 105.24]

The requested notes have been added to the E&S plans (Sheets 2-3 Note 4 and Sheets 4-5 Note 5).

5. The Mitigation Plan indicates 0.15 acres will be replanted. Please indicate the acreage of wetland and riparian areas. [25 Pa. Code §§105.21(a)(1)]

The Mitigation Plan predominantly addresses impacts to wetland W1 both the PEM and PFO areas. The 0.15 acres references the portions of PFO wetland within the additional temporary workspace that will be planted with shrub species. Text has been added to the Mitigation Plan (Planting Scheme section) describing the riparian area plantings, approximately 0.16 acres, requested by the DCNR due to the recreational designation of the Schuylkill River.

6. On the Plan Drawings and Mitigation Plan please provide a table of the proposed planting plan. Please include size, type (bare root/container), and quantity of plantings. [25 Pa. Code §§105.21(a)(1)]

A table has been added to the E&S Plans Site Restoration (sheets 6-7) and to the Mitigation Plan (Planting Scheme section) detailing the proposed plantings.

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7. As mentioned in previous comment 18, please include corrective action plan to address noxious weeds at percentages higher onsite than outside disturbed areas. [25 Pa. Code §§105.20a(a), 105.21(a)(1), and 105.13(e)]

Invasive species monitoring and corrective actions have been added to the Monitoring Plan within the Monitoring section.

8. In the E&S Site Restoration Plan, only the riparian area has Erosion Control Blanket (ECB). Review whether the area around the wetland requires ECB. [25 Pa. Code § 105.13(g)]

Given the minimal topography associated with the wetland area and limited areas of excavation in the area around the wetland, it was determined that standard seeding/mulching would be sufficient. During restoration a field adjustment can be made if the added protection of ECB seems warranted.

9. In the Technical Deficiency Response Letter #23 and #27, Texas Eastern affirms geotextile fabric and timber mats will be used in wetlands for stockpiling. It is not clear in the Typical Wetland Construction detail in the E&S plan nor in the Figure WC-1 of the HDD plan sheets that mats will be placed under stockpiles. Please revise. Please also show the wetland will be matted on the Plan Sheets. [25 Pa. Code § 105.13(g)]

The Typical Wetland Construction detail in the E&S plan and Figure WC-1 in the HDD plan sheets have been updated to note that timber mats and geotextile fabric will be used in wetlands when stockpiling soil. Also, Note 6 of the HDD plan sheets (A-1000 and A-1010) has been revised to state the use of timber mats in the wetlands.

10. Previous comment 24 does not appear to have been placed on the E&S Plans. DEP suggests the addition of the following note: If a restrictive layer, including but not limited to clay or fragipans, is encountered during the trench excavation of a wetland, a knowledgeable wetlands scientist on the Environmental Inspection Team shall oversee backfilling of the trench and installation of trench plugs, in order to maintain wetland hydrology. [25 Pa. Code § 105.13(g)]

The note was previously added to the HDD plan sheets, Note #8 on sheet L-1200. It has now also been added to E&S Plans, sheets 4 - 5 Note 6.

11. In the E&S Narrative, please provide a narrative about removal of the Port-a-dam, should high flows be encountered. [25 Pa. Code § 105.13(g)]

Text has been added to the E&S Narrative regarding potential high flows and the Portadam (Sheet 9 under the BMP Descriptions, Temporary controls and in the Maintenance Program).

12. In the E&S Plans, the sequence should include the evaluation of weather forecast and a sign-off by environmental inspector, foreman, and any other responsible individual prior to the start of the resource crossing. [25 Pa. Code § 105.13(g)]

The evaluation of weather forecast and sign-off prior to the start of the Portadam work has been added to the Sequence of Construction (#7).

13. Please include in the Sequence of Construction the installation and removal of the proposed Port-a-dam. This should include any steps needed for installation, dewatering, etc. Also, please show all proposed E&S BMPs required for installation of the Port-a-dam and removal of the existing natural gas pipeline. This should include all pumps, dewatering areas, filter bags, etc. [25 Pa. Code § 105.13(g)]

Additional detail has been added to the Sequence of Construction (#7). BMPs associated with the Portadam have been added to the E&S Plan, including pumps and dewatering area (sheets 4-5).

14. The Sequence of Construction should be very specific to the proposed construction activities. Please revise the Sequence of Construction to be site specific in relation to the scheduling of earth moving activities on the Erosion and Sediment Control Plans. This includes direct installation, construction, stabilization and removal of BMPs in relation to the scheduling of earth disturbance activities. [25 Pa. Code § 105.13(g)]

Additional detail has been added to the Sequence of Construction (#s 4-8).

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15. In the E&S Plan, provide maintenance of the Port-a-dam. [25 Pa. Code § 105.13(g)]

Text regarding the Portadam has been added to the BMP Maintenance section and to the BMP Descriptions, Temporary controls (Sheet 9).

16. Plan mapping notes a turbidity curtain, but details call for a Port-a-dam system, please consistently label the proposed BMPs to be used in the river crossing. [25 Pa. Code §102.11(a)(1)]

A turbidity curtain will be used with the Portadam to add another layer of protection and minimize potential turbidity.