

## Confidential and Sensitive Project Information & Electronic Submittal of Applications

for RPCO Authorized Projects

Rev. 9-1-2020

This fact sheet has been prepared to provide information to the regulated community regarding 1) the removal of Confidential and Sensitive Information (CSI) from permits and project files, and 2) the submittal of electronic applications that are being reviewed and approved by the Regional Permit Coordination Office (RPCO).

RPCO is comprised of two sections which are responsible for the permitting of various complex projects including pipelines and highways. Owing to the size and scope of permits reviewed by RPCO, only electronic copies of permit materials and project files are accepted and will be retained. In addition, per a stipulated settlement, multi-county pipeline project information must made available to the public on the Pennsylvania Pipeline Portal<sup>1</sup>.

For these reasons, applicants will likely be required to submit two separate sets of permit applications and project files. One set should contain all information, including CSI, and will be utilized to facilitate RPCO's review. The second set should exclude or redact CSI and will be utilized for public posting and public review.

## Examples of CSI may include:

CONFIDENTIAL INFORMATION	CATEGORY
Home Address and phone numbers	Personally Identifiable Information
Tax Identification Number	Personally Identifiable Information
Social Security Number	Personally Identifiable Information
Bank Account Information	Personally Identifiable Information
Attorney Client Privileged	Confidential
Proprietary Information	Declared Proprietary
Professional Licensure Numbers	Personally Identifiable Information
Geographic Information System (GIS) data and representations <sup>2</sup>	Declared Proprietary or protected from release by state or federal statute
Information on Threatened, Endangered or Sensitive Resources	Declared Sensitive or protected from release by state or federal statute

<sup>&</sup>lt;sup>1</sup> Information submitted to RPCO will be made available to the public unless the person providing that information requests that it be treated as confidential.' See <u>Document Number 012-0200-005</u>, titled: 'Public Access to Information and Right to Know Law Policy'.

<sup>&</sup>lt;sup>2</sup> GIS data and representations will be evaluated for CSI treatment on a case-by-case basis. In most cases it may be made available to the public in a printed or PDF version in an overview map format. In certain cases, locational information may be subject to state or federal statutes that prohibit its release in the interest of protecting national security. Refer to appropriate statutes, such as, Act 156



Applicants should be aware that RPCO may request two sets of materials during each step of the permitting process including application, response to technical deficiencies, and project amendments and revisions. In addition, CSI information may be contained within the files for Submerged Lands License Agreements, Mitigation Banking/In-Lieu Fee Program related documents, permit/authorization documents, permit/jurisdictional determination, guidance and correspondence, compliance/enforcement documents and fee and penalty payments.

## DEP Public Upload Form - OnBase

## http://www.depgreenport.state.pa.us/DEPFormPublicUpload

The DEP Public Upload form serves as a means for the general public to upload one or more completed DEP documents. Applicants should utilize this method to transmit all permit applications to RPCO unless directed otherwise. Applicants should submit both sets of permit documents via the same upload and include 'Confidential' in the beginning of the file name for any files with CSI information. Applicants should discuss appropriate file-size and file structure with RPCO prior to transmitting files via OnBase – however, it is recommended that the file size of the 'Confidential' files that will be uploaded to the Pennsylvania Pipeline Portal be limited to approximately 100MB.

Questions regarding the removal of CSI information from permits and project files or the utilization of OnBase may be directed to the Project Manager - or to RPCO at <a href="mailto:RA-EPREGIONALPERMIT@pa.gov">RA-EPREGIONALPERMIT@pa.gov</a> / 717-772-5986.