



June 2, 2021

Mr. Nicholas Bryan
Sunoco Pipeline, L.P.
535 Fritztown Road
Sinking Spring, PA 19608

Re: Incompleteness Review Letter
Erosion and Sediment Control General Permit (ESCGP)
Project Name: Pennsylvania Pipeline Project - Major Amendment – HDD 0541
Permit Application Number: ESG 0100015001
Municipality: Thornbury Township
County: Delaware County

Dear Mr. Bryan:

The Department of Environmental Protection (DEP) and the Delaware County Conservation District (District) have reviewed the above referenced application and has determined that it is incomplete. The following list specifies the items that must be included in the resubmittal of your application and/or the submission of additional information. The Pennsylvania Erosion and Sediment Pollution Control Program Manual and the Pennsylvania Stormwater Best Management Practices Manual include information that will aid you in responding to some of the items listed below. The items are based on applicable laws and regulations, and the guidance sets forth the DEP's preferred means of satisfying the applicable regulatory requirements.

Please note that pursuant to 25 Pa. Code § 102.6(c), this information must be received within 60 calendar days, on or before August 4, 2021, or DEP may consider the application withdrawn by the applicant.

Items for Resubmittal or Submission of Additional Information

Please be advised that the application for the Major Amendment should be completed for the Major Amendment portion of the project.

1. NOI: Section B- If there is an existing DEP Client ID No. please include it.
2. NOI: Section H: Using the applicant's environmental due diligence, please verify the answer provided to Question 11- It was checked "No" when asked if there are there potentially hazardous naturally occurring geological or soil conditions in any portion of the project or surrounding area.

3. NOI: Section H: Box 1 is checked that “Act 167 Plan approvals on or after January 2005” however, it is stated that these plans were adopted before January, 2005 (and it is not checked on page 10 that the plan is consistent with an applicable approved Act 167 Plan). Please verify and revise the application accordingly.
4. NOI: Section H: Item D - It is checked that there are no off-site discharges to areas other than surface waters. However, the lowest berm (berm #3) discharges just to the side of the road. I wasn't sure if this should be checked 'Yes'. Please verify this and revise the application accordingly.
5. NOI: Section H: Item f- Watershed 1- It was checked “Other” but there was no description. Please provide a description.
6. NOI: Section H: Item g - There were no critical stages listed. Please provide the critical stages.
7. NOI: Section I: Part 1: Per the instructions for any non-discharge BMPs not checked an explanation of why they were not utilized is required to be provided. Please provide an explanation.
8. Checklist Item 3b **Soil Characteristics**: The limitations of the soils including methods for resolutions were not included. Please include the methods for resolutions.
9. Checklist Item 3c- **Earth Disturbance Activity**: The past and present land uses were not described for this area. Please provide the descriptions for the land uses.
10. Checklist Item 3e- **Surface Water Classification**: The location of all surface waters of the Commonwealth which may receive runoff within or from the site was not shown on the drawings. Please provide this information on the drawings.
11. Checklist Item 3g- **BMP Installation Sequence Narrative**: The sequence of construction was not included on the plans. Please add the sequence of construction on the plan drawings.
12. Checklist Item 3h- **Supporting Calculations and Measurements**: It states that this is found in “Attachment 4” but there is no Attachment 4 included. Please provide Attachment 4.
13. Checklist Item 3i- **Plan Drawings**: There is not a legend, details, notes, or specifications included. Please provide this information on the plan drawings for this Major Amendment application.

14. Checklist Item 3o- **Riparian Forest Buffers:** Please verify that there are no required riparian forest buffers for this application and mark the application accordingly.
15. Checklist Item 5b- **Pennsylvania Inventory of Historical Places and the National Register of Historical Places:** It is stated that this is found in “Section 6” but there is no Section 6 attached to this application. Please provide Section 6.
16. Checklist Item 6- **Pennsylvania Natural Heritage Program (PNHP):** In the PNDI receipt it was answered in Question 2 on page 4 that “someone qualified to identify and delineate wetlands has investigated the site, and determined that NO wetlands are located in or within 300 feet of the project area. (A written report from the wetland specialist, and detailed project maps should document this.)” Please provide the written report from the wetland specialist.
17. Checklist Item 7a- **Topographic Features:** It was indicated that the existing topographic features of the project site and immediate surrounding area was included in Attachment A but that was not found in that section. They were found on Appendix E (PCSM Plans). However, the name of USGS quadrangle map was not included. Please revise the checklist accordingly and please provide the name of the USGS quadrangle map.
18. Checklist Item 7b- **Characteristics of Naturally Occurring Geologic Formations and Soil Conditions:** The depth and limitations of the soils and the geologic formations were not included. Please include this information.
19. Checklist Item 7c- **Earth Disturbance Activity Characterization:** The characteristics of the project site, including the past, and present land uses, areas of cuts and fill, proposed impervious areas, and proposed contours of project area were not included. Please include this information.
20. Checklist Item 7d- **Net Change in Volume and Rate of Runoff:** It was indicated that this was found on Page 3 of the Narrative. However, the net change in volume was found in Appendix D for Watershed 01. Also, the net change for rate could not be located. The Point of Discharge was not labeled as such on the post-development drainage area map. Please revise the application checklist accordingly, please provide the net change for rate, and please label the discharge point.
21. Checklist Item 7e- **Surface Water Classification:** The identification and location of the surface waters of this Commonwealth, which may receive runoff within or from the project site and their classification under Chapter 93 was not included. Please include this information.

22. Checklist Item 7f- **BMP Description Narrative:** The written description did not include all of the structural BMPs. Permanent stabilization specifications were not included. Please include this information.
23. Checklist Item 7g- **BMP Installation Sequence Narrative:** There was not a sequence provided for the installation of the infiltration trench. Also, a schedule of inspections for critical stages of PCSM/Site Restoration BMP installation was not provided. Please provide this information.
24. Checklist Item 7h- **Supporting Calculations:** Attachment E of the NOI instructions was not included for the bio-infiltration BMP(s). Also, in the NOI it was checked that a verification report was included but it could not be located. Please include this information.
25. Checklist Item 7j- **Long Term Operation and Maintenance Schedule:** There was not an operation and maintenance schedule for the vegetated swales. Please amend the application to include this information.
26. Checklist Items 7k (**Material Recycling and Disposal**), 7l (**Addressing Impacts from Naturally Occurring Geologic Formations and Soil Conditions**), 7m (**Thermal Impacts**), and 7o (**Antidegradation Requirements**)- The location/page numbers were not included for these items and they are required. Please include this information.
27. Checklist Item 8a- **Site Characterization and Assessment:** Infiltration and geotechnical studies that identify location and depths of test sites and methods used were not included. Please include this information.
28. Checklist Item 8e- **Construction Techniques-** If there are soil conditions as discussed above then this would need to be addressed and it was currently answered “N/A”. Please verify and revise the application checklist accordingly.
29. Checklist Item 8f- **Antidegradation Requirements:** This was answered “N/A” but this is required to be addressed. Please address accordingly.

You may request a time extension, in writing, on or before August 4, 2021, to respond to deficiencies beyond the sixty (60) calendar days. Requests for time extensions will be received by DEP 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 § 102.6(c).

As stipulated in 25 Pa. Code § 102.6(c) of DEP Chapter 102 rules and regulation (regarding complete applications) information requested by this office must be received within sixty (60) calendar days from the date of this letter, or DEP will consider the application withdrawn by the applicant and no further action will be taken on the application. Fees are not refunded when an application is considered withdrawn by the applicant.

Please provide a response letter addressing the above items and submit 1 electronic copy of the revised plans, narratives, documents, etc. to the DEP through DEP's FTP site and 1 electronic copy of the revised plans, narratives, documents, etc. to the District. Please contact the District for information regarding electronic submissions to their office.

If you have question about your application, please contact me at (484) 250-5152 and refer to ESG 0100015001 HDD 0541.

Sincerely,

Christopher Smith

Christopher Smith, P.E.
Chief, Construction Permits Section
Waterways and Wetlands

cc: Mr. Simcik – Tetra Tech, Inc.
Ms. Wheeler – Delaware County Conservation District
Mr. Smith
Mr. Hohenstein
Mr. Shankar
Re 30