



# THE COUNTY OF CHESTER



## COMMISSIONERS

Terence Farrell  
Kathi Cozzone  
Michelle Kichline

Brian N. O'Leary, AICP  
Executive Director

## PLANNING COMMISSION

Government Services Center, Suite 270  
601 Westtown Road  
P. O. Box 2747  
West Chester, PA 19380-0990  
(610) 344-6285 Fax (610) 344-6515

December 20, 2016



Rachel Silva  
Tetra Tech  
301 Ellicot Street  
Buffalo, NY 14203

Re: **Sunoco Logistics Pennsylvania Pipeline Project (Mariner East 2) Stormwater Consistency**  
East Goshen, East Nantmeal, East Whiteland, Upper Uwchlan, Uwchlan, Wallace, West Goshen, West Nantmeal, and West Whiteland Townships

Dear Ms. Silva:

On December 5, 2016, we spoke, regarding a determination of consistency with stormwater management standards and criteria for the Sunoco Logistics' Pennsylvania Pipeline Project, also known as the Mariner East 2 Project. This project extends through Chester County, specifically East Goshen, East Nantmeal, East Whiteland, Upper Uwchlan, Uwchlan, Wallace, West Goshen, West Nantmeal, and West Whiteland Townships in Chester County. We ask that you coordinate directly with these nine Townships regarding their input in this matter.

Thank you for the opportunity to provide comments. If you have any questions, please contact Carrie Conwell at 610-344-6285.

Sincerely,

cc: East Goshen Township  
East Whiteland Township  
Uwchlan Township  
West Goshen Township  
West Whiteland Township

East Nantmeal Township  
Upper Uwchlan Township  
Wallace Township  
West Nantmeal Township  
Carrie Conwell, CCPC

BOARD OF SUPERVISORS  
EAST GOSHEN TOWNSHIP  
CHESTER COUNTY  
1580 PAOLI PIKE, WEST CHESTER, PA 19380-6199

December 3, 2015

Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicot Street  
Buffalo, NY 14203

Re: Sunoco Pipeline, L.P. - Pennsylvania Pipeline Project  
Floodplain/Storm water Management Program Consistency Request

Ms. Batoon:

Please be advised that the Township has a local Storm Water Management Ordinance effective in the project area. After review of the proposed activity the Township **cannot determine compliance** with the ordinance from the materials submitted. Please forward the Township plans which identify the Limit of Disturbance for the project and the proposed Erosion and Sedimentation controls for all the work areas noted in the project area.

In regard to the Floodplain Management Plan, the proposed activity for the above referenced project has been reviewed and determined to be consistent with the Township Floodplain ordinance and the FEMA Floodplain Management Program effective in the Township

Please call or e-mail me at [mgordon@eastgoshen.org](mailto:mgordon@eastgoshen.org) if you have any questions.

Sincerely,



Mark A. Gordon  
Township Zoning Officer

Cc: Nathan Cline, P.E. Township Engineer (via e-mail only)

August 26, 2016

EGOS 0730

Mark Gordon, Zoning Officer  
East Goshen Township  
1580 Paoli Pike  
West Chester, PA 19380

**RE: Sunoco Pennsylvania Pipeline Project**

Dear Mark:

As requested, we have reviewed the following information, prepared by Tetra Tech, in connection with the referenced project:

- *“Pennsylvania Pipeline Construction Spread 6, Chester County Conservation District, E&S Control & Site Restoration Plan”*, dated March 18, 2016, Sheets ES-0.01 to 0.11 and ES-6.56 to ES-6.69.

The plans propose six (6) separate boring pit/staging area locations associated with the pipeline installation within the Township; no wetland or stream crossings are proposed. Per correspondence from Tetra Tech dated July 22, 2016, they are seeking confirmation from the Township that the noted plan submission conforms to the *Chester Creek Act 167 Plan* and the subsequent County-wide update, which has been adopted as the Township’s Stormwater Management Ordinance (§195). The Chester County Conservation District requires this confirmation as part of their permit review process.

We have reviewed the submission and offer the following comments:

STORMWATER MANAGEMENT (§195)

1. An East Goshen Township Stormwater Management (SWM) Permit is required, as this project meets the definition of *“regulated activity”*. (§195-15.A)
2. Persons proposing to construct regulated activities with one (1) acre or more of proposed earth disturbance that do not discharge directly to waters of the Commonwealth shall provide the Township with a copy of the easements authorizing such discharge or confirmation from PaDEP that an easement is not required. (§195.15.G) Based on the plans provided, it is unclear if this situation occurs; additional plan information is necessary, addressed further below.
3. In the referenced correspondence, it is indicated that *“the project limits of disturbance will be restored to meadow...”*. However, some of the areas proposed to be disturbed (and returned to meadow) are currently heavily vegetated or wooded. Furthermore, it is unclear how each area is intended to be restored; no meadow plantings or seed mixes are proposed, and it is more likely a ‘lawn’ condition would be established. Therefore, different runoff coefficients may be applicable, possibly causing the total post-construction runoff volume to exceed that of predevelopment. Further analysis may be warranted to confirm that the requirements of §195-19 through §195-24 are being met.

4. Any facility located within a PennDOT right-of-way shall comply with PennDOT minimum design standards and permit submission and approval requirements. Copies of approved Highway Occupancy Permits and associated detour plans, where applicable, shall be provide with the SWM Permit submission. (§195-24.F)
5. Regarding the SWM site plan contents, the following shall be provided:
  - a. A listing of all regulatory approvals required and the status for each. Proof of application or documentation of approval for each shall be part of the SWM site plan. (§195-27.A.(2))
  - b. The statement and signature block signed and/or sealed by the applicant and/or engineer per §195-27.A.(3) & (4).
  - c. Plans shall be provided in 24-inch by 36-inch format. (§195-27.B)
  - d. Tax parcel numbers, names, address and phone numbers of the owners of the subject properties. (§195-27.B)
  - e. Additional detail regarding the legal property boundaries, per §195-27.B.(7).
  - f. A list of potential PNDI impacts and clearances, if the total earth disturbance exceeds one acre. (§195-27.B.(8)(g)).
  - g. Any steep slope areas. (§195-27.B.(8)(j))
  - h. Soil names and boundaries, hydrologic soil groups. (§195-27.B.(8)(k))
  - i. Any contaminated subsurface areas. Note the Sunoco gas station at the northwest corner of the intersection of North Chester Road and Paoli Pike is currently subject to a PaDEP Remedial Action Plan (DEP Facility ID No. 15-20353). (§195-27.B.(8)(m))
  - j. Location of existing wells and recharge areas on the project properties. (§195-27.B.(8)(n))
  - k. Description of existing and proposed ground cover and land use, including the type and total area. (§195-27-B.(10)).
  - l. The location of all existing utilities within the site and with 50 feet of the proposed limits of disturbance. (§195-27.B.(15))
  - m. The total disturbed area in square feet and acres. (§195-27.B(16)) We recommend it be provided for each separate area.
  - n. A written description of the information required within §195-27.C shall be included in SWM site plan, notably: existing conditions (C).(1); the effect of the project on various features (C).(5); proposed nonpoint source pollution controls (C).(6); project time schedule (C).(7); and construction stages/phases, if applicable (C).(8).
6. As there are no permanent BMPs currently proposed, nor any changes to existing elevations, it does not appear plan recording, an O&M plan/agreement, nor as-built plans would be warranted.
7. The Township should confirm anticipated fees and expenses will be covered by the applicant. (§195-35)
8. It is unclear if the Township will have right of entry to the multiple properties involved with the project. (§195-46)

### E&S PLANS

9. General:
  - a. Are the proposed limits of disturbance sufficient for all construction activities, including material storage, deliveries, equipment and parking?
  - b. It is unclear why Note 18, Sheet ES-0.01 indicates Uwchland Township only.
  - c. Please confirm the proposed infiltration berm referenced on Sheet ES-0.02 (amongst other sheets) is not located within East Goshen Township; it was not apparent on the design plans.

- d. Please clarify what specific seed mix is intended for the disturbed areas within East Goshen Township, as 'lawn' areas are not indicated on the provided tables (Sheet ES-0.07).
  - e. What is the method for replacing existing vegetation? For example, along Boot Road in front of the shopping center where the pipeline is to be excavated. Decorative screening including mature trees and shrubs extend throughout this entire area. Other areas present similar concerns.
  - f. Do the plans provided to the Township reflect the changes documented in the March 2016 "Workspace Changes" plan set?
  - g. Various boring locations include monument signs for business or neighborhoods; these potential conflicts do not appear on the plans.
  - h. Inlet protection is not provided.
10. Regarding Sheets ES-6.56/ES-6.57:  
*Note: Though located within West Goshen Township, the staging area in this location drains to East Goshen Township.*
- a. The proposed access location for this staging area is a very challenging location of a four lane cross section of North Chester Road between the SR 202 on-ramp and Greenhill Road intersection.
  - b. It is unclear what is proposed by the "Riparian Forest Buffer"; no detail is provided.
  - c. No E&S controls are proposed on the south side of the tributary to Ridley Creek, a High Quality (HQ) stream that drains to East Goshen Township. However, E&S controls are proposed on the north side of the same tributary; it's unclear why the limit of disturbance extends to the opposite side of the stream.
  - d. It is unclear what material is proposed for the "Proposed Parking Area"; the limits of this area are unclear. Stormwater management controls may be required.
11. Regarding Sheets ES-6.58/ES-6.59:
- a. The limit of disturbance extends much further north than the boring pit area; it's unclear why the LOD is so large and if no excavation proposed, why the E&S controls are proposed in these areas. Further, the LOD appears to include driveways and parking of the adjacent sites; it's unclear why the LOD extends into these areas. Further information should be provided if access between these adjacent sites it be impeded or limited and if parking spaces, drive aisles and/or driveways are to be unavailable for users and emergency services.
  - b. The plans do not indicate an existing concrete median in the shopping center driveway, limiting ingress/egress. We recommend the proposed construction entrance location be reviewed due to the presence of the median and its location immediately adjacent to an existing traffic signal.
  - c. The compost filter sock and aggregate stockpile leaders are incorrect.
12. Regarding Sheet ES-6.60:
- a. Silt fence and the LOD are shown within the cartway.
13. Regarding ES-6.61/ES-6.62:
- a. The plans do not indicate an existing concrete median within Enterprise Drive, limiting vehicle ingress/egress. This staging area proposes four (4) construction entrances. We recommend the proposed entrances be reviewed and consolidated to the most appropriate location(s).
  - b. The purpose of the proposed LOD area extending south towards Paoli Pike is unclear. Currently it's a stormwater management basin and does not appear to be an appropriate location for material storage, parking or similar activities.
  - c. It appears the compost sock filter leader should state silt fence.
  - d. A portion of the LOD appears to extend into the cartway of North Chester Road.

14. Regarding Sheet ES-6.64:
  - a. Multiple buildings are not indicated on the east side of North Chester Road.
  - b. We recommend the proposed construction access at the intersection of East Boot Road and North Chester Road be reviewed due to its close proximity to an existing signal.
  - c. The plans do not indicate an existing concrete median within Eldridge Drive, limiting vehicle ingress/egress. We recommend the proposed construction entrance location be reviewed.
  - d. The limit of disturbance extends much further north than the boring pit area; it's unclear why the LOD is so large and if no excavation proposed, why the E&S controls are proposed in these areas.
15. Regarding Sheet ES-6.66:
  - a. An existing residence at the northeast corner of the intersection of North Chester Road and Bow Tree Drive is not indicated.
  - b. The plans do not indicate an existing concrete median within Bow Tree Drive, limiting vehicle ingress/egress. We recommend the proposed construction entrance location be reviewed.
16. Regarding Sheet ES-69:
  - a. Please be advised that the proposed staging areas is a low-lying area that frequently ponds with water and may not be appropriate for the proposed activities.

MISCELLANEOUS

17. We recommend sight distances for all proposed accesses meet minimum PennDOT requirements.
18. It is unclear if the construction access locations have been designed to accommodate all anticipated vehicles utilizing the same.
19. All contractors and subcontractors will be required to register with the Township. (§124)
20. Much of the construction will take place in or near residential areas; it is unclear if the project will comply with the sound level limits of §156.
21. It may be appropriate to have the Township's designated emergency services personnel review the plans.

Should you have any further questions or comments, please contact me.

Sincerely,

**PENNONI**



Nathan M. Cline, PE  
Township Engineer

cc: Rick Smith, Township Manager (via email)


Township of East Nantmeal  
3383 Conestoga Road  
Glenmore, PA 1934

Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicott Street  
Buffalo, NY 14203

**Reference: Sunoco Pipeline L.P. – Pennsylvania Pipeline Project  
Floodplain/Stormwater Management Program Consistency Request**

In accordance with Township regulations, neither a review for consistency with floodplain regulations nor a review for consistency with stormwater regulations can be done until such time as a Zoning Permit Application and a Grading Permit Application respectively are completed and submitted with applicable fees paid.

Permit applications along with a fee schedule can be found online at <https://enant.wordpress.com/>. The latest fee resolution for Grading Permits is enclosed. Applications and fees must be submitted to the Township Office. It is recommended that you contact the Township Office at 610-458-5780 to confirm their hours/availability and what constitutes a complete permit application.

  
Municipal Official (signature & title)  
LTC Consultants  
Township Engineer

LINDA CLUCK      11/30/15  
Printed Name                      Date

**RESOLUTION 2014-3**

**EAST NANTMEAL TOWNSHIP  
STORMWATER ORDINANCE  
GRADING PERMIT FEES**

BE IT RESOLVED by the East Nantmeal Township Board of Supervisors, that the initial filing and escrow fees for a Grading Permit or other information submitted which is not part of a subdivision or land development plan but requires review by the Township or its consultants under the East Nantmeal Township Stormwater Ordinance shall be based on the amount of proposed impervious surface and/or earth disturbance activity as follows:

For Regulated Activity associated with Agricultural Activity:

SIZE	FILING FEE	ESCROW FEE
between 1000 and 10,000 sq. ft. impervious plus no more than 5000 sq. ft. additional parking/movement area AND less than 1 acre disturbed	\$150	\$750
10,000 sq. ft. impervious or more or no more than 5000 sq. ft. parking/movement area AND less than 1 ac. disturbed	\$150	\$2000
1 ac. or more disturbed	\$200	\$3000

For all other Regulated Activity:

SIZE	FILING FEE	ESCROW FEE
between 1000 and 2000 sq. ft. impervious AND between 5000 and 10,000 sq. ft. disturbed	\$150	\$750
2000 sq. ft. or more impervious OR 10,000 sq. ft. or more disturbed	\$150	\$2000
1 acre or more disturbed	\$200	\$3000

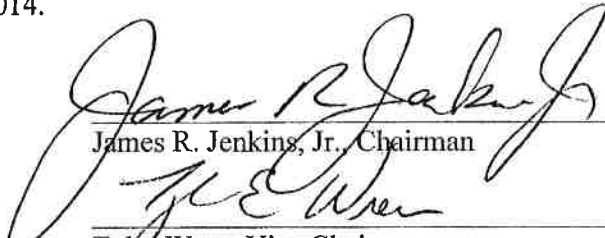
**General Fee Requirements and Information**

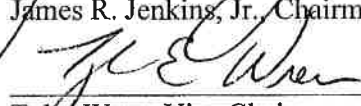
1. All fees shall be paid at the time of the initial submittal of the plan. If a waiver from plan submittal is being requested, the applicable fee shall still apply.
2. The filing fee is non-refundable.
3. When the balance in the escrow fee falls below 50% of its original amount, the applicant shall deposit additional funds to restore the escrow to the original amount prior to or at the same time as submittal of revised plan. The Township Secretary shall be consulted regarding the escrow balance.

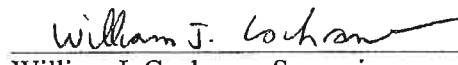


4. The applicant shall be responsible for all costs and shall reimburse the Township for all engineering and other consultant fees incurred for review and inspection in excess of the escrow fee paid. This shall be paid prior to issuance of a building, zoning and/or grading permit.
5. All engineering and other consultant fees shall be billed at the applicable effective hourly billing rate adopted by the Township.
6. The balance (if any) of the escrow fee shall be refunded to the applicant after issuance of a building, zoning and/or grading permit; or a waiver is granted AND after all bills are paid.
7. When a stormwater management plan is part of a subdivision and/or land development plan, the cost shall be covered by the subdivision and/or land development filing and escrow fee.

RESOLVED this 16<sup>th</sup> day of December, 2014.

  
James R. Jenkins, Jr., Chairman

  
Tyler Wren, Vice Chairman

  
William J. Cochrane, Supervisor

ATTEST:

  
Secretary

SEAL

Elverson Borough  
101 South Chestnut Street  
P.O. Box 206  
Elverson, PA 19520

Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicott Street  
Buffalo, NY 14203

**Reference: Sunoco Pipeline L.P. – Pennsylvania Pipeline Project  
Floodplain/Stormwater Management Program Consistency Request**

**FLOODPLAIN CONSISTENCY:**

No Plan     Project is Consistent     Project is NOT Consistent (Explain Below)

*The information given to the Borough indicates this project does not impact Floodplain within Elverson Borough.*

**STORMWATER CONSISTENCY:**

No Plan     Project is Consistent     Project is NOT Consistent (Explain Below)

*The information provided to the Borough is insufficient to determine consistency with our Stormwater Plan. Elverson requests an application and land development plan for our review to determine consistency.*

  
Municipal Official (signature & title)

*Mark W. Stoltz*    *11-23-15*  
Printed Name    Date



June 27, 2016

Ms. Lori Kolb, Secretary  
Borough of Elverson  
P. O. Box 206  
Elverson PA 19520

RE: Sunoco Pennsylvania Pipeline Project  
Stormwater Consistency Evaluation  
SSM File 105325.2016

Dear Lori:

As the appointed Engineer for Elverson Borough, our office has reviewed the Erosion and Sediment Control plans for the Chester County portion of the Sunoco Pennsylvania Pipeline Project, prepared by Tetra Tech, dated March 18, 2016. The submitted drawings consist of 15 sheets. The project proposes no permanent above ground facilities and no permanent changes to ground cover conditions.

We have determined that the above referenced project is consistent with the Elverson Borough Stormwater Management ordinance, Ordinance No. 2014-1 adopted on August 5, 2014.

As always, please contact me if you have any questions.

Sincerely,  
SSM GROUP, INC.

A handwritten signature in black ink, appearing to read "Mark Stabolepszy".

Mark Stabolepszy, P.E.  
Vice President  
[mark.stabolepszy@ssmgroup.com](mailto:mark.stabolepszy@ssmgroup.com)

cc: James D. Scheffey, Esq.  
Megan Carson, Tetra Tech

**From:** [Dan Daley](#)  
**To:** [Batoon, Ailene](#)  
**Cc:** [Rocco, Domenic](#); [Hohenstein, John](#); [Silva, Rachel](#); [Doug Hanley](#)  
**Subject:** Sunoco - Uwchlan Township, Chester County  
**Date:** Thursday, December 10, 2015 8:11:48 AM  
**Attachments:** [1265-490 Tetra Tech re SWM - Floodplain Consistency Response Ltr 12-09-15.pdf](#)

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Ailene

On behalf of Uwchlan Township, Chester County - please find a letter regarding the Stormwater and Floodplain Consistency as requested.

Please feel free to contact me with any question.

Daniel Daley, P.E.  
E. B. Walsh & Associates, Inc.  
Lionville Professional Center | 125 Dowlin Forge Road | Exton, PA 19341  
Direct: 610.903.0033 | [ddaley@ebwalshinc.com](mailto:ddaley@ebwalshinc.com)



**EDWARD B. WALSH & ASSOCIATES, INC.**  
*Complete Civil Engineering Design / Consultation Services*  
Lionville Professional Center  
125 Dowlin Forge Road  
Exton, PA 19341

December 9, 2015

Ailene Batoon  
Tetra Tech Inc.  
285 Ellicott Street  
Buffalo, NY 14203  
via electronic mail: ailene.batoon@tetrattech.com

Re: **Sunoco Pipeline L.P., Pennsylvania Pipeline Project**

Dear Ms. Batoon,

On behalf of Uwchlan Township, my office has reviewed the above referenced project as requested by your office. Please be advised that the Township has a local Storm Water Management Ordinance (Ordinance 2013-07) effective in the project area. As noted in the attached September 25, 2015 letter and after studying the proposed activity, there is insufficient information supplied on the plans to determine if the project is consistent with the Township's Act 167 Stormwater Ordinance. Therefore we cannot supply the requested consistency statement for the project.

In regard to the Floodplain Management Plan, the project is not located in the boundary of the FEMA Flood Insurance Study and therefore this project has no effects on the Floodplain Management Program effective in the Township.

Very truly yours,  
EDWARD B. WALSH & ASSOCIATES, INC.  
Uwchlan Township Engineers

Daniel H. Daley, PE

cc: Doug Hanley, Uwchlan Township (dhanley@uwchlan.com)  
Domenic Rocco, P.E., PA DEP  
John Hohenstein, P.E. (johohenste@pa.gov)  
Rachel Silva (rachel.silva@tetrattech.com)

**REGISTERED PROFESSIONAL ENGINEERS & LAND SURVEYORS**  
*Pennsylvania, New Jersey, Delaware & Maryland*  
610-903-0060 FAX 610-903-0080  
www.ebwalshinc.com  
Established 1985



**EDWARD B. WALSH & ASSOCIATES, INC.**  
*Complete Civil Engineering Design / Consultation Services*  
Lionville Professional Center  
125 Dowlin Forge Road  
Exton, PA 19341

September 25, 2015

Department of Environmental Protection  
Mr. Domenic Rocco, P.E.  
Waterways and Wetlands Program Manager  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401

Re: Sunoco Pipeline, L.P.  
Erosion and Sedimentation Control General Permit (ESCGP-2)  
Uwchlan Township, Chester County

Dear Mr. Rocco:

On behalf of Uwchlan Township, Edward B. Walsh & Associates, Inc. (EBWA) has reviewed below submitted plans and information for the Sunoco Pipeline, L.P. project. The following information has been received by the Township:

- Pennsylvania Pipeline Project Construction Spread 6, Chester County Conservation District Erosion & Sediment Control & Site Restoration Plan prepared by Tetra Tech, prepared for Sunoco Pipeline, L.P., dated August 2015 – DRAFT.
- Sunoco Pipeline, L.P. Pennsylvania Pipeline Project Notice of Intent for Coverage under the Erosion and Sediment Control General Permit (ESCGP-2) for Earth Disturbance Associated With Oil and Gas Exploration, Production, Processing, or Treatment Operations or Transmission Facilities - including five (5) attachments

As depicted on the plan, Sunoco Pipeline, L.P. (Sunoco) is proposing to install two 20-inch welded steel natural gas liquids pipelines. The installation of the pipes are shown to be constructed via a combination of boring and open cut construction. Our review is focused generally to comments associated with the ESCGP-2 permit application package. The following comments and recommendations are offered on behalf of Uwchlan Township:

**REGISTERED PROFESSIONAL ENGINEERS & LAND SURVEYORS**  
*Pennsylvania, New Jersey, Delaware & Maryland*  
610-903-0060 FAX 610-903-0080  
[www.ebwalshinc.com](http://www.ebwalshinc.com)  
Established 1985

1. **General Plan Content Comments.** In order for the Township to comment on the proposed impacts of the pipeline project, additional plan content must be provided to determine the impacts to existing resources including but not limited to:
  - a. Limits of tree removal and clearing.
  - b. Locations of bore pits.
  - c. Depth of the proposed pipes.
  - d. Location of the existing Sunoco pipeline (adjacent to the proposed pipelines).
  - e. Location and depth of existing utilities.
  
2. **Post Construction Stormwater Management Comments.** The Notice of Intent (NOI) submitted with our Act 14, 67, 68 and 127 Municipal Notice (not signed or dated), indicates in Section F – Post Construction Stormwater Management (PCSM) Plan BMPs that the PCSM Plan, in its entirety, is consistent with all requirements pertaining to rate, volume, and water quality from an Act 167 Stormwater Management Plan approved by DEP on or after January 2005. Uwchlan Township has adopted the Chester County-Wide Act 167 Model Ordinance and based upon our review, there is insufficient information supplied on the plans and within the NOI to determine if this project is consistent with the approved Act 167 Plan. We recommend the applicant be required to address the following comments prior to issuance of the PA DEP permits:

**Chapter 214 – Uwchlan Township Stormwater Management Ordinance – 2013-07**

A. **Section 15.G** – *For Regulated Activities with one (1) acre or more of proposed Earth Disturbance, existing drainage peak rate discharges up to and including the one hundred (100)-year storm onto or through adjacent property(ies) or downgradient property(ies), including diffuse drainage discharge, shall not be altered in any manner without written permission from, and, where applicable as determined by the Municipality an easement and agreement with, the affected Landowner(s) for conveyance of discharges onto or through their property(ies). Such discharge shall be subject to any applicable discharge criteria specified in this Ordinance.*

As noted below in additional detail, an increase in peak discharge rate may occur due to the change in land cover (tree removal). This increase in peak rate must be controlled by stormwater management facilities that meet the requirements of the Township Ordinance or agreements with the affected Landowners must be obtained.

B. **Section 17. Erosion and Sediment Control**

1. Additional erosion and sedimentation controls must be provided at the bore pit locations.
  
2. The limit of disturbance must be shown on the plan.

**C. Section 19. Water Quality and Runoff Volume Requirements**  
**Section 20. Infiltration Requirements**  
**Section 21. Stream Channel Protection Requirements**  
**Section 22. Stormwater Peak Rate Control Requirements**  
**Section 23. Calculation Methodology**

Within Uwchlan Township, the proposed improvements will include the installation of two new 20-inch diameter pipes. It does not appear that any new impervious coverages are proposed to be constructed. Stormwater runoff impacts as a result of the project may include:

1. An increase in runoff volume and / or peak rate of runoff due to the following:
  - A change in ground cover from the pre-developed condition to the post developed condition.
  - An alteration of the absorption / infiltration capacity of the soil within the project area (compaction) as a result of the construction activities.
2. Flow alteration due to grading modifications that may occur during the final restoration process (ie. divert runoff to locations which previously did not receive runoff due to the installation of water bar or mounding of backfill operation).

In order to determine if the project is in compliance with the above referenced Sections 19-23 of the Township's Act 167 Stormwater Management Ordinance, the design engineer must provide the following:

- A plan and calculations detailing the areas in which the ground cover will be permanently modified after the construction is complete.
- The design of stormwater management controls for all areas in which the runoff volume and / or rate will be increased based upon the change in ground cover, including but not limited to wooded areas that will not be restored following construction. In order to minimize impacts, it is recommended that all wooded temporary workspace areas be restored to a wooded condition following the completion of construction.
- Design details and construction notes must be provided to detail the proposed soil restoration process for all areas within the limit of disturbance, including but not limited to construction entrances, stockpile areas and staging areas.
- The design must detail the plans for the soil backfill operation procedures for the pipe placement and if the excess material will be exported from the site or remain onsite. Alterations to the ground surface elevations in the post developed condition from the spoils must be detailed on the plan to ensure modifications to the overland flow of runoff does not occur.



**D. Section 27. SWM Site Plan Contents**

The submitted plans do not comply with the Township's Ordinance Act 167 Ordinance for the following plan content items:

1. Section 27.A.3&4 – Certification blocks must be added to the plan set.
2. Section 27.B.2 – Names and tax parcel numbers must be added to the plan for all affected parcels.
3. Section 27.B.7 - Legal property boundaries must be shown on the plans. The Township Boundary lines must be properly depicted on both the north and south end of the Township. The location is significantly mislabeled (700 feet +/-).
4. Section 27.B.8, 10 & 11 – Additional plan content must be added to the plan including but not limited to steep slopes, soil types, FEMA floodplain boundaries, and the limit of earth disturbance.
  - a. On Sheet 6.33 of 93, the watershed label indicates the incorrect watershed and stream classification. This area of the project is located in the Shamona Creek Watershed and the Chapter 93 classification is High Quality.
  - b. On sheets 6.41 and 6.42 of 93, the existing features, with the exception of roads, contour lines and the streams, are not shown on the plan. All existing buildings are not shown on the plans.
5. Section 27.B.15 – The location of all existing utilities, including but not limited to the Township storm and sanitary sewer, must be indicated on the plan in the areas of the proposed work.

**E. Article V – Performance and Inspection of Regulated Activities, and Final As-built Plans & Article VII – Operation and Maintenance (O&M) Responsibilities and Easements**

Depending on the stormwater analysis resulting for the proposed construction impacts, in particular the tree removal, if stormwater management facilities are required, the requirements for Article V and VII must be followed.

**F. General Comments**

1. On the submitted plans, six (6) water bars are proposed to be constructed along the project corridor within Uwchlan Township. Clarification as to the purpose of the water bars must be provided as they will divert runoff to locations which previously did not receive runoff. As per the detail on sheet 0.08 of 93, the water bars shall be left in place after permanent stabilization has been achieved.
2. Clarification is requested as if any rock blasting is anticipated.
3. Legend on sheet 0.02 of 93 indicates a hatch pattern for the locations of the soil amendments. This same hatch pattern is shown on sheet 6.34 and 6.35 for properties within Eagleview Boulevard. Clarification if soil amendments are proposed in these areas or if the hatch pattern is labeled incorrectly compared to

the legend. Similarly, the Infiltration Berm legend line type appears to be incorrect (compared to the limit of disturbance).

3. **Notice of Intent Comments.**

- Page 2. Project Description. The length of the project is not labeled on the project description (XXX miles).
- Page 3.
  - Item 11. Geologic formations or soil types have not been identified on the submitted plans.
  - Item 14. Riparian Forest Buffers have not been identified on the submitted plans.
  - Item 16. Antidegradation implementation requirements have not been addressed on the submitted plans. Uwchlan Township requests copies of these requirements for our review and comment.
  - Item 17. Seasonal high groundwater levels have not been identified. The depth of the proposed excavation and pipeline installation must be identified to determine if potential impacts may occur.
- Page 5. Item 2 – Riparian Buffers and limits of clearing have not been identified on the plan therefore the impacts to the buffers cannot be identified.
- Page 6. Section E. Site Restoration Plan BMPs. Applicant has indicated the Site Restoration Plan is consistent with an applicable approved Act 167 Plan. Based upon the supplied information, Uwchlan Township does not concur the project is consistent with the County-Wide Act 167 Plan model ordinance. Uwchlan Township requests a copy of the “verification report” as noted in Section E.
- Page 7.
  - Item 1.A. The NOI indicates the PCSM, in its entirety, is consistent with all requirements pertaining to rate, volume, and water quality from an Act 167 Stormwater Management Plan approved by DEP. Again, based upon the supplied information, Uwchlan Township does not concur with this statement.
  - Item 2. Riparian Buffer Information. Riparian buffers and impacts to the buffers are not identified on the plan therefore it is not clear as to the impacts of the project to the buffers. The applicant is indicating they are proposing to Protect and Convert the riparian buffer. A Buffer Management Plan is required as noted on the bottom of Page 7.
- Page 8. The applicant has indicated on the top of Page 8, the project is proposing to restore the pipeline right-of-way to a meadow condition therefore supporting calculations are not required. As noted above, stormwater impacts may occur due to the clearing operation and construction equipment impacts. The applicant should be made to address these issues.
- Page 10 and 11. Refer to *Page 7* comments noted above.
- Page 12 and 13. Not applicable as the proposed impervious coverages are located outside of Uwchlan Township.
- Page 14. Antidegradation Analysis. The nondischarge BMPs are indicated *re-construction drainage pattern intact within the right of way*. Water bars are proposed to remain which will alter the drainage pattern.

- Page 17. The submitted NOI received by Uwchlan Township was not signed, sealed or dated.
- Uwchlan Township requests Attachment A and B of the NOI Instructions to be submitted to the Township for future submittals (*A - Standard E&S Plan Technical Guide and B - Standard PCSM Technical Guide*).

4. **General Information Form (GIF).**

- Page 3 of 7.
  - The box was checked that the applicant has informed the surrounding community and addressed any concerns prior to submitting the application to the Department. By receipt of this letter, we are informing the Department that our concerns have not been addressed.
  - Land Use Information. Municipal Land Use Letters for the project have not been provided (no letter issued from Uwchlan Township).
- Page 6 of 7. Item 13.0 – the air emission information has not been provided (labeled *To Be Determined*).
- Page 7 of 7. The submitted copy of the GIF Certification was not signed.

5. **Township Ordinance Requirements.**

The project is inconsistent with the following Township Ordinance requirements:

- A. Subdivision and Land Development Ordinance. Section 509.2.d - *There shall be a minimum distance of 50 feet, measured in the shortest distance, between any proposed dwelling unit and any petroleum, petroleum products or natural gas transmission line which traverses the subdivision or land development.* It appears the new pipelines may violate this minimum setback requirement from various dwelling units along the project corridor.
- B. Zoning Ordinance – Section 510 – Floodplain District. Within the project limits of Uwchlan Township, the proposed pipes cross floodplain areas. The installation of pipelines within the floodplain is not permitted without obtaining a variance.
- C. Zoning Ordinance - Section 618 – Steep Slopes. In order to evaluate the impacts to steep slopes, the plans must be revised to delineate the Precautionary (15% to 25%) and Prohibitive (greater than 25%) steep slope areas within the project limits.
- a. Per Section 618.4.a.2, No more than 15% of prohibitive slopes on within the project area shall be regraded, cleared, built upon, or otherwise altered or disturbed. Utility lines where approved by the Township and all other regulatory agencies, when it can be demonstrated that no other routing is feasible, are a permitted use within prohibitive slopes.
  - b. Per Section 618.4.e, all stockpiles of earth shall be seeded or otherwise stabilized immediately. Any disturbed area of prohibitive slopes or any cut and fill resulting in slopes of greater than 3:1 shall be protected with an erosion control blanket.
  - c. Per Section 618.4.h, removal of, or disturbance to, existing vegetation on the site shall be minimized. The proposed impacts on existing vegetation shall be evaluated in terms of the potentially detrimental effects on slope stability, transportation and recharge of stormwater, aesthetic and traditional characteristics

September 25, 2015  
Department of Environmental Protection  
Mr. Domenic Rocco, P.E.  
Re: Sunoco Pipeline, L.P.  
Uwchlan Township, Chester County  
Page 7 of 7

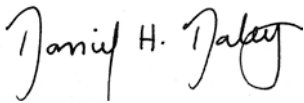
of the landscape, and existing drainage patterns. Mitigation measures may be required by the Board as it deems appropriate. Upon receipt of the delineation of the steep slopes, mitigation measures may be required.

6. **General Comments.**

- A. The proposed pipeline will cross the Township's sanitary sewer conveyance system in approximately sixteen (16) locations. Many of the sewer crossings are asbestos cement pipe. In order to ensure the construction does not negatively affect the Township's sewer system and cause a pollution event, plan and profile view of all sewer crossings must be submitted for review and approval.
  
- B. The majority of the project through Uwchlan Township is proposed to be constructed via a boring operation. In order to minimize the impact to the resident properties to the southeast of N. Whitford Road (parallel to Crump Road) and the west of Colonial Drive (east of Carton Place), we request Sunoco change the construction method from open cut to boring at these locations.

In conclusion, the above comments are offered for the Departments review of the project. If you should have any questions or require any additional information, please feel free to contact me.

Very truly yours,  
EDWARD B. WALSH & ASSOCIATES, INC.  
Uwchlan Township Engineers



Daniel H. Daley, P.E.

cc: Uwchlan Township  
Sunoco ([DONALD.ZOLADKIEWICZ@sunoco.com](mailto:DONALD.ZOLADKIEWICZ@sunoco.com))  
Joe Sofranko ([jsofranko@chesco.org](mailto:jsofranko@chesco.org))  
Robert Simcik ([Robert.Simcik@tetrattech.com](mailto:Robert.Simcik@tetrattech.com))



December 14, 2015

Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicott Street  
Buffalo, NY 14203

RE: Sunoco Pipeline L.P. – Pennsylvania Pipeline Project  
Floodplain/Stormwater Management Program Consistency Request  
PN: WNT-15-202

Dear Ms. Batoon:

On behalf of West Nantmeal Township, we have completed a review of the Consistency Request letter dated November 18, 2015 along with the accompanying Location Maps and Site Maps submitted by Tetra Tech on behalf of Sunoco Pipeline L.P. requesting our acknowledgment of consistency with the Township Floodplain Management and Stormwater Management Programs.

We offer the following comments for your consideration:

- 1) We find the presented design to be in general conformance with the West Nantmeal Township Zoning Ordinance for the Flood Hazard Overlay District (Article 5, Section 502).
- 2) The proposed pipeline will incur  $\geq 5,000$  square feet of proposed earth disturbance, and is subject to the provisions of the Stormwater Ordinance (Ordinance No. 113-2013, Table 106.1). Please submit an application for a Stormwater Management Permit with the required information as specified in the *Stormwater Management Application Package* demonstrating the pipeline project's compliance with the provisions of the West Nantmeal Stormwater Management Ordinance, specifically the Erosion and Sediment Control requirements.

Should you have any questions or concerns, please do not hesitate to contact me at 610-705-4500.

Very truly yours,  
CEDARVILLE Engineering Group, LLC

April M. Barkasi, P.E.  
Township Engineer

cc: Gary C. Elston, Chairman, West Nantmeal Township Board of Supervisors  
Susan L. Ward, Secretary/Treasurer, West Nantmeal Township

# West Whiteland Township

101 Commerce Drive, Exton, Pennsylvania 19341  
Telephone (610) 363-9525 \* Admin Fax (610) 363-5099 \* Code Fax (610) 280-7739  
Web Page: [www.westwhiteland.org](http://www.westwhiteland.org)

February 9, 2016

Ms Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicott St.  
Buffalo, NY 14203

In re: Sunoco Pipeline L.P., Pennsylvania Pipeline Project  
Review for consistency with local floodplain and stormwater management regulations

Dear Ms Batoon:

In response to your correspondence to this office dated November 18, 2015, please be advised as follows:

## STORMWATER CONSISTENCY:

West Whiteland Township has a Stormwater Management Ordinance, adopted as Township Ordinance 409 on December 11, 2013 pursuant to and consistent with the requirements of Pennsylvania Act 167, which now exists as Chapter 270 of our Code of Ordinances. Unfortunately, the information you provided with your request was not sufficient for me to make a determination of compliance.

The mapping you provided with your request shows segments of "horizontal directional drill," which I assume indicates sub-surface activity and would not be subject to regulation by our Stormwater Management Ordinance. However, it is not clear whether the other segments will require excavation or other surface disturbance. As provided for in §270-6.B of the Stormwater Management Ordinance, this project will be exempt from the Ordinance requirements if no area of proposed earth disturbance exceeds 5,000 square feet. Please provide information showing the proposed limits of disturbance as well as the size of each such area so that we may make a determination of whether this project is exempt.

Please note that even if we should determine that this project is exempt, §270-6.B also states that "exemption shall not relieve the Applicant from implementing such measures as are necessary to protect health, safety, and welfare, property, and water quality." If this project will involve *any* earth disturbance (as that term is defined in §270-14), we will also need to review the measures you are proposing in response to §270-6.B.

We conclude that we require more information in order to make a determination as to the consistency of the above-referenced project with the Township Stormwater Management Ordinance.

**FLOODPLAIN CONSISTENCY:**

The West Whiteland Township floodplain regulations are fully consistent with those required by the Federal Emergency Management Agency in order for our residents and property owners to participate in the National Flood Insurance Program. These regulations are found in Article XIII of our Zoning Ordinance. As shown on the mapping you provided, the proposed pipeline(s) will cross both floodways and floodplains associated with Lionville Run (see sheet 26) and Valley Creek (sheet 28).

Uses permitted in floodways and floodplain areas are listed in §325-62 of the Zoning Ordinance. Based upon our understanding that the Public Utility Commission has ruled that this project is a type of public utility, it is our determination that pipeline crossings are permitted by right pursuant to §325-62.B(1)(a)[6] and §325-62.C(1)(a) of the Zoning Ordinance as a type of "utility transmission line." We therefore conclude that the proposed activity for the above-referenced project is consistent with the FEMA floodplain management program effective in the Township. However, should it be determined at some time in the future that Sunoco Pipeline L.P. or this project is not a public utility, then we will need to revisit this conclusion.

I trust that this response addresses your request. Complete copies of all Township Ordinances, including those referenced above, are available on-line as a link from the Township website at [www.westwhiteland.org](http://www.westwhiteland.org). Please contact me if you have further questions regarding this matter.

Regards,



John R. Weller, AICP  
Director of Planning & Zoning / Zoning Officer  
West Whiteland Township

cc: Township Manager  
Township Solicitor

## Carson, Megan

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**From:** John Weller <jweller@westwhiteland.org>  
**Sent:** Tuesday, July 12, 2016 11:53 AM  
**To:** Carson, Megan  
**Subject:** RE: Sunoco PPP Act 167 Consistency Letter

Yes! Both of those documents would be helpful – critical in fact. Please send them along electronically if at all possible (my mailbox is pretty big – you shouldn't get a bounce-back).

Thx,

*John R. Weller, AICP*

Director of Planning & Zoning / Zoning Officer  
West Whiteland Township  
101 Commerce Drive  
Exton, PA 19341  
tel: 610-363-9525  
fax: 610-363-5099  
[www.westwhiteland.org](http://www.westwhiteland.org)

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**From:** Carson, Megan [mailto:Megan.Carson@tetrattech.com]  
**Sent:** Monday, July 11, 2016 12:42 PM  
**To:** John Weller <jweller@westwhiteland.org>  
**Subject:** Sunoco PPP Act 167 Consistency Letter

Hello Mr. Weller,

Thank you calling me back. I believe the Sunoco PPP project will exceed 5,000 sqft of disturbance within West Whiteland township. An E&S report and a PCSM report have been created as part of the ESCGP-2 permit application currently under review with PADEP. Please let me know if you think these reports would meet your needs and I will send them to you ASAP.

Thank you,  
Megan

**Megan Carson** | Chemist I/Permit Specialist  
Direct: 412.921.8963 | Main: 412.921.7090 | Personal Fax: 412.921.4040  
[megan.carson@tetrattech.com](mailto:megan.carson@tetrattech.com)

Tetra Tech Inc. | Site Development  
661 Andersen Dr. | Pittsburgh, Pa 15220-2700 | [www.tetrattech.com](http://www.tetrattech.com)

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.



Westtown Township  
1039 Wilmington Pike  
West Chester, PA 19382

Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicott Street  
Buffalo, NY 14203

**Reference: Sunoco Pipeline L.P. – Pennsylvania Pipeline Project  
Floodplain/Stormwater Management Program Consistency Request**

**FLOODPLAIN CONSISTENCY:**

No Plan       Project is Consistent       Project is NOT Consistent (Explain Below)

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**STORMWATER CONSISTENCY:**

No Plan       Project is Consistent       Project is NOT Consistent (Explain Below)

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Robert R. Pinger  
Municipal Official (signature & title)

Robert R. Pinger      12/1/15  
Printed Name      Date

Township Manager



**DELAWARE COUNTY CONSERVATION DISTRICT  
ROSE TREE PARK - HUNT CLUB  
1521 N. PROVIDENCE ROAD  
MEDIA, PENNSYLVANIA 19063**

Telephone: (610) 892-9484

Web Address: [www.delcocd.org](http://www.delcocd.org)

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**DIRECTORS**

**Cheryl Graff Tumola** - Chairperson  
**Robert W. Bernhardt** - Vice chair  
**Frank McKee** - Sec./Treas.  
**Colleen P. Morrone** - Co. Council  
**Ray Iacobucci**  
**Randy Bates**  
**Wayne Megill, Jr.**  
**Gino Razzi**  
**Elaine P. Schaefer**

---

**Edward M. Magargee**  
District Manager

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September 29, 2016

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Ailene Batoon  
Tetra Tech, Inc.  
301 Ellicott Street  
Buffalo, NY 14203

Re: Sunoco Pipeline L.P. Pennsylvania Pipeline Project  
Stormwater Management Program Consistency

Dear Ms. Batoon:

All consistency letters must be obtained from the impacted municipalities as per the approved Act 167 Plans and ordinances adopted for compliance by the local municipalities.

Your project will also have a Post Construction Stormwater Management Plan review by the Department of Environmental Protection.

This review does not take the place of any reviews, which may be required by the Department of Environmental Protection. It is the duty of the contractor to comply with the provisions of Act 38 (PA One Call 1-800-242-1776) before performing any excavation work.

If you would like further assistance, please feel free to contact the Conservation District Office at (610) 892-9484.

*Edward M. Magargee*

---

Edward M. Magargee,  
Conservation District Manager

**BOARD OF COMMISSIONERS**

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MICHAEL J. HIGGINS, Vice President  
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JOHN A. GRANGER  
Township Manager  
RICHARD D. LEHR  
Township Secretary  
ELIZABETH NAUGHTON-BECK  
Township Solicitor  
JOSEPH J. VISCUSO  
Township Engineer

5021 PENNELL ROAD  
ASTON, PENNSYLVANIA 19014-1896  
(610) 494-1636 Fax (610) 494-1065  
WEB SITE: [www.astontownship.net](http://www.astontownship.net)

February 17, 2016

Rachel Silva  
Tetra Tech Inc.  
285 Elliott Street.  
Buffalo, New York 14203

Dear Ms. Silva,

This is to advise you that the Sunoco Pipeline LP project is consistent with the Aston Township Floodplain Management and Stormwater Management programs.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Granger".

John A. Granger  
Township Manager



# BROOKHAVEN BOROUGH

2 Cambridge Road, Suite 100 ~ Brookhaven, PA 19015-1708

PHONE  
(610) 874-2557

FAX  
(610) 874-2612

August 11, 2016

Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicott Street  
Buffalo, NY 14203

Re: Sunoco Pennsylvania Pipeline Project  
Floodplain / Stormwater Management Consistency

Dear Ms. Batoon:

Please be advised that a review of the project has determined that the proposed work is consistent with the Borough's Stormwater Management Ordinance #163 of 2012 and Floodplain Management Ordinance #762 of 2012.

You should be aware that a Floodplain Permit will be required prior to construction.

Very truly yours,

  
Charles J. Catania, Jr., PE  
Borough Engineer

CJC,Jr/cd  
Cc M. McKinley

2016-08-11 10:00 AM

FOR OFFICIAL USE ONLY



# TOWNSHIP OF EDMONT

1000 Gradyville Road  
PO Box 267  
Gradyville, Pennsylvania 19039  
610-459-1662 phone 610-459-3760 fax

January 7, 2016

Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicott Street  
Buffalo, NY 14203

Re: Sunoco Pipeline L.P. – Pennsylvania Pipeline Project  
Stormwater Management Statement, Local Road  
Opening Permits

Dear Ms. Batoon:

In response to Tetra Tech's November 18, 2015 correspondence and request, Edgmont Township officials have reviewed and studied the materials provided. With respect to your request relative to the Project's consistency with local Stormwater Management Ordinances, this letter will confirm that Edgmont Township has adopted and enforces stormwater management regulations, including wetlands. The Township is aware of wetlands in the immediate area of the proposed project. Compliance cannot be determined until the extent of disturbance is known.

The Township requires an application for grading in order to understand impacts of and compliance with Stormwater Management. Please contact the building department for a permit application. Edgmont also requires tree replacement and road opening permits which it will pertain to the proposed Sunoco Project.

The Edgmont Township Ordinances, applications and forms are available free, on line, at [www.edgmont.org](http://www.edgmont.org).

Grading Permits, reviews and inspections will be applicable and required. Edgmont Township requests that prior to any construction, the appropriate qualified individuals contact the Township for more information. Thank you.

Very truly yours,

Samantha Reiner  
Edgmont Township Manager  
Zoning Officer  
Secretary/Treasurer

cc: Township Officials



# TOWNSHIP OF EDGMONT

1000 Gradyville Road  
PO Box 267  
Gradyville, Pennsylvania 19039  
610-459-1662 phone 610-459-3760 fax

January 7, 2016

Ailene Batoon  
Tetra Tech, Inc.  
285 Ellicott Street  
Buffalo, NY 14203

Re: Sunoco Pipeline L.P. – Pennsylvania Pipeline Project  
Floodplain Consistency Confirmation

Dear Ms. Batoon:

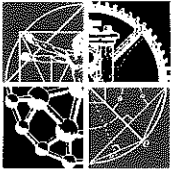
In response to Tetra Tech's November 18, 2015 correspondence and request, Edgmont Township officials have reviewed and studied the materials provided. With respect to the Project's consistency with local Floodplain Management Ordinances, this letter will confirm that as proposed, the project appears to be consistent with the FEMA Floodplain Management Program adopted and active in Edgmont Township.

Very truly yours,

A handwritten signature in blue ink that reads "Samantha Reiner". The signature is fluid and cursive, with a long, sweeping underline.

Samantha Reiner  
Edgmont Township Manager  
Zoning Officer  
Secretary/Treasurer

cc: Township Officials



# CATANIA ENGINEERING ASSOCIATES, INC.

Consulting Engineers & Land Surveyors

February 12, 2016  
File No. 84200-261

Edward M. Magargee, District Manager  
Delaware County Conservation District  
Rose Tree Park – Hunt Club  
1521 N. Providence Road.  
Media, PA 19063

Re: Sunoco Pipeline, L.P. (SPLP)  
Pennsylvania Pipeline Project  
Stormwater & Floodplains  
Thornbury Township, Delaware County

Dear Sir or Madam:

On behalf of Thornbury Township, Delaware County we are writing as the Township Engineer to give official comment with respect to Stormwater and Floodplain Consistency on the above referenced project as follows:

## Stormwater Consistency – NOT CONSISTENT

Please be advised that Thornbury Township, Delaware County has an adopted Act 167 plan for both Chester Creek and Ridley Creek Watersheds, as both were updated and adopted by Thornbury Township on October 17, 2012. After reviewing the submitted materials, it was found that submitted materials are NOT consistent with the Local Stormwater Management Plan referenced above. Please note the following:

1. It should be noted that the pipeline along SR 352 within Thornbury Township, is located within the 85% release rate district of the Ridley Creek Watershed as denoted within the Act 167 Plan and Ordinance. It should also be noted that the watershed changes to the Chester Creek Watershed once the proposed pipeline turns away from SR 352 and goes behind Duffers Restaurant. This Chester Creek watershed area is indicated within the Act 167 Plan and Ordinance as requiring a 50% stormwater runoff rate reduction. Updated Plans and calculations should be submitted for review, as the project will certainly require stormwater facilities, not currently shown, to meet the required reduction standards.
2. Prior discussions with Sunoco officials indicated that additional valves would be added near the Duffers Restaurant and within the Andover Residential Development Open Space. No valves or associated pads are shown on these plans and should be clarified. We have concerns of additional impervious areas and lack of stormwater management in this area.
3. The above referenced additional information was previously requested in a letter to PA DEP dated September 25, 2015 and copied to Sunoco Pipeline L.P. and Tetra Tech. This information was also requested during a meeting at the Thornbury Township Building with Donald Zoladkiewicz of Sunoco Logistics and various other Sunoco representatives on December 8, 2015.

Sunoco Pipeline, L.P. (SPLP)  
Thornbury Township, Delaware County  
Page 2 of 2

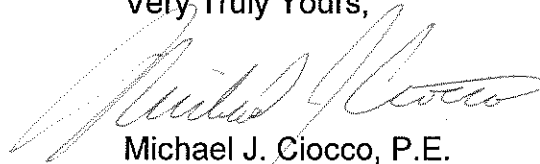
February 12, 2016

Floodplain Consistency - CONSISTENT

In regard to the Floodplain Management Plan, the above referenced project is located within Zone X – Areas determined to be outside the 0.2% annual chance of floodplain for the project areas delineated within Thornbury Township.

Thank you for the opportunity to comment on this project and we look forward to working with you in the future. Should you have any further comments or questions, please feel free to contact me.

Very Truly Yours,



Michael J. Ciocco, P.E.  
For Catania Engineering Assoc., Inc.  
Township Engineer

Cc: Sunoco Pipeline L.P.  
Tetra Tech  
PA Department of Environmental Protection  
Thornbury Township