



February 13, 2018

Berks County Conservation District

1238 County Welfare Road, Suite 200
Leesport, Pennsylvania 19533

Attn: Mr. Eric Hout
Urban Resource Conservationist

Re: Response to Comments

Birdsboro Pipeline Project

Permit Number: ESG 00 011 17 0001

BCCD Project ID Number: ESP-01317

Birdsboro Borough; Union, Amity, Oley, and Rockland Townships, Berks County

Dawood Project No. 216097.01

Dear Mr. Hout:

On behalf of DTE Midstream Appalachia, LLC, we are hereby submitting the revised sheets for the above-referenced project. Included with this submission are three (3) revised copies of the ESCGP-2 Permit Sheets.

These revisions are based on comments received on February 9, 2018 from BCCD and PADEP. Due to comments from other agencies since the last review, other alterations have been made to the permit package. Following is a list of the items revised.

Berks County Conservation District

1. Comment #6 on the Berks County Conservation District's Technical Deficiency Letter dated 10/30/2017 has not been adequately addressed: "Several compost socks appear to cross contours (e.g. socks on the south side of the proposed pipeline shown on drawing D-2103. Compost socks should not cross contours. Please align compost socks parallel to contours or provide an alternative BMP demonstration. [25 Pa. Code §§ 102.4(b)(5)(ix)]"

The revised E&S plans now provide a detail for compost sock J-hooks. I'm not sure if this is acceptable to the Department, or if the J-hook detail would need to be reviewed as an alternative BMP.

- ***The use of compost filter sock as a run-off diversion in pipeline applications is common practice. This alternate BMP is currently approved by PADEP. (See attachment "Alternative E&S and PCSM BMPs, Revised March 29, 2017)***

2. Comment #12d on the Berks County Conservation District's Technical Deficiency Letter dated 10/30/2017 has not been adequately addressed: "Please provide the standard notes on Detail 5 (Erosion Control Blanket) on page 274 of the E&S Manual. [25 Pa. Code §§ 102.11(a)(1) & 102.4(b)(5)(ix)]"

It does not appear the detail for the Erosion Control Blanket found on sheets E&S-D-2207 and PCSM-D-3201 contain all of the information found on the detail from the E&S Manual.

- ***The "Erosion Control Blanket" detail has been updated to include the notes from page 274 of the E&S Manual. (Detail 1, Drawing E&S-D-2207 and Detail 5, Drawing PCSM-D-3201)***

The following new technical deficiencies regarding the Pennsylvania Natural Diversity Inventory (PNDI) search receipts dated 3/1/17 and 10/4/17 were noted upon review of the most recent submission:

3. A clearance letter from DCNR has not been provided for the 3/1/17 PNDI. [25 Pa. Code §§ 102.6(a)(2)]
 - ***No official response was received from DCNR regarding the 3/1/17 PNDI. The DCNR response, dated 10/13/2017, to the 10/4/2017 PNDI supersedes any previous versions of the PNDI and therefore acts as the final coordination.***
4. The 10/4 PNDI receipt indicates a Great Blue Heron potential impact from the PA Game Commission. The PA Game Commission Clearance Letter for the 10/4 receipt has not referenced a clearance of the Heron. Provide a clearance letter from the Game Commission providing clearance of the Heron. [25 Pa. Code §§ 102.6(a)(2)]
 - ***PGC did not mention Great Blue Heron specifically in their 10/30/2017 response, but is inherently included within that response. Prior to their response letter, a phone call with Olivia Braun occurred, where it was clarified that the only workspaces in the vicinity of the Great Blue Heron habitat (as shown on the Conservation Explorer map) were the two staging areas in Oley, PA, which will not require any improvements.***

5. No clearance letter has been provided from the USFWS for the 10/4 search receipt. The following justification was provided on page 357 of the Narrative: "Coordination with USFWS was not updated, as the information sent to them on 9/8/17 and 9/27/17 contained the most up-to-date project details and their response on 9/27/17 included a determination of no effect for bog turtle and offered no additional coordination regarding the other species under their jurisdiction." Provide clearance from the USFWS for all the species provided on the 10/4 PNDI. [25 Pa. Code §§ 102.6(a)(2)]
- ***USFWS doesn't participate in the electronic document review on the PACE system, we didn't formally re-open consultation via mailed hard copy submission for the 10/4 receipt. Our prior consultation was never closed so we continued to feed the agency project revisions as they became available. The USFWS had already reviewed and approved the project proposal as submitted on PACE via the 10/4 receipt so further consultation was not required. The ESCGP-2 submission that was previously submitted for BCCD review contained all applicable approvals from USFWS. These responses can be found in the following coordination documents:***
 - ***Bog Turtle – In their 08/02/2017 letter and 09/22/17 stamped response***
 - ***Bats – In their 08/02/2017 letter***
 - ***NE Bulrush, MBTA, and BGEPA – in Brian Scoffield's email dated 08/04/2017***

Pennsylvania Department of Environmental Protection

In addition to the comments above, an elevated review memo was received from PADEP for the Joint Permit Application, dated January 30, 2018. See below for applicable comments and responses.

1. Technical Deficiency #12 from DEP's Technical Deficiency Letter dated October 30, 2017 has not been adequately addressed. *On Detail 2 of DTE-E&S-D-2204 regarding Typical Wetland Crossing, Note 4, states that topsoil and subsoil will be segregated and stockpiled to wetlands without standing water or saturated soils. Revise the detail, or provide a separate detail, to identify how topsoil will be segregated in wetlands with standing water or saturated soils. [25 Pa. Code §105.18a(a)(3), 105.18a(b)(3), 105.14(b)(4)]*

The revised notes still do not identify soil segregation in wetlands with standing water or saturated soils. Revise this detail to identify how topsoil will be segregated in wetlands with standing water or saturated soils.

- ***The note has been revised to clarify the detail applies to all wetlands, not just wetlands without standing water or saturation. (Note 4, Detail 2, Drawing E&S-D-2204)***
2. Technical Deficiency #22 (second paragraph) from DEP's Technical Deficiency Letter dated October 30, 2017 has not been adequately addressed. Additionally, should DTE change the location of HDD exit point on the Armorcast facility, such change would need to include an evaluation of the exit points intersection with any contaminated soils on the site. If the exit point for this HDD changes, provide revised plans. [25 Pa Code §105.13(e) (1)(x), 105.14(b)(4), 105.15(c)]

Revise the application to identify and address how the proposed water obstructions and encroachments, including the HDD under the Schuylkill River, will identify, control, and prevent the spread of contamination at the Armorcast facility. Include plans and process for containment, remediation, disposal, and clean-up standards to be utilized and a description of all remedial activities for contaminants encountered that have been conducted to date. [25 Pa. Code §105.14(b)(4), 105.15(c), 105.13 (e)(1)(x)]

- ***The “Construction Monitoring and Waste Management Addendum” for “The Limited Geoprobe Investigation Report and Construction Monitoring and Waste Management Plan” was revised and expanded to include a discussion of plans and process for containment, remediation, disposal, and standards to be utilized in the event that contamination is encountered during pipeline construction. “The Limited Geoprobe Investigation Report and Construction Monitoring and Waste Management Plan” was provided to PADEP on February 9th, 2018. Applicable monitoring and procedural notes have also been added to plans. Drawings E&S-D-2206)***
3. Provide details on the proposed Conventional Bore construction methodology. Include, at a minimum, details on any proposed fluids or air for the removal of soil, if the system will be a closed or open loop, will the bore be under pressure, if a casing will be used, and if the cuttings will be returned within or outside the casing. It is recommended a diagram be provided to accompany the description. [25 Pa. Code §105.13(e)(1)(i), 105.13(e)(1)(iii), 105.136(e)(1)(x)]
- ***A detailed conventional auger boring procedure was added to the construction sequence (Drawing E&S-D-2205).***
 - ***The “Typical Road Crossing – Conventional Auger Bore” detail has been revised to include the additional notes. (Note 2 & 4, Detail 5, Drawing E&S-D-2202)***
 - ***The “Typical Stream Crossing – Conventional Auger Bore” detail has been revised to include the additional notes. (Note 2 & 4, Detail 3, Drawing E&S-D-2204)***

Additional Coordination

Since the last submission dated December 21st, 2017, additional revisions have been made to the Birdsboro Pipeline Project. See below for a summary of additional revisions.

- ***Silt Fence was added within the LOD on the Armorcast Property per RTE coordination. (Drawings E&S-D-2101 and E&S-D-2130)***
- ***Several State Road (SR) crossing methods were updated from open trench to conventional auger bore. The following is a summary of revisions:***
 - ***Limekiln Road (SR 2025) – E&S-D-2106***
 - ***Weavertown Road (SR 2041) – E&S-D-2110***
 - ***Limekiln Road (SR 2025) – E&S-D-2112***
 - ***Oley Turnpike Road (SR 2020) – E&S-D-2117***
- ***One sheet was updated to call out the road crossing method more visibly.***
 - ***Kauffman Road (T 712) – E&S-D-2121***

If you have any questions and/or comments, please contact me by phone at (412) 596-1530 or by email at twirbicki@dawood.cc.

Sincerely,
Dawood Engineering, Inc.

Thomas A. Wirbicki, P.E.
Project Manager