pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

December 23, 2020

Mr. Mark Valori
Adelphia Gateway, LLC
1415 Wyckoff Road
Wall, NJ 07719

Re: Technical Deficiency Letter
Adelphia Gateway Project - Phase 2B
ESCGP-3 Permit Application No. ESG 01 00 19 001
Municipality: Lower Chichester Township, Trainer Borough, and City of Chester
County: Delaware County

Dear Mr. Valori:

The Department of Environmental Protection (DEP) and the Delaware County Conservation District (DCCD) have reviewed the above referenced ESCGP-3 permit application and have identified the technical deficiencies listed below. The *Pennsylvania Erosion and Sediment Pollution Control Program Manual* (E&S Manual) and the *Pennsylvania Stormwater Best Management Practices Manual* (BMP Manual) include information that may aid you in responding to some of the deficiencies listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth DEP's established means of satisfying the applicable regulatory and statutory requirements.

Technical Deficiencies from DCCD

ABACT Controls (Marcus Hook Creek). Chapter 102,11 (a) (1)

1. **DCCD Comment (11/20/20):** Pump water filter bag needs to be surrounded by compost filter sock to be considered an ABACT.

   JMT Response (12/14/20): Pumped water filter bag detail on SR-7 was updated to include Note 8, which indicates that in special protection watersheds, the pumped water filter bag must be surrounded by a compost filter sock or operated in conjunction with a sump pit.

   DCCD Comment (12/23/20): The note added by the consultant concerning Surrounding Pump water filter bag with a compost filter sock in Special Protection Watersheds is not sufficient. This ABACT is also required for use when used in areas of Impaired Waters. As is the case when used within the Marcus Hook Watershed.

2. **DCCD Comment (11/20/20):** Inlet protection – unsure the drainage area. So, whether or not the ½ acre drainage area limit of filter bag has been exceeded.

   JMT Response (12/14/20): JMT has confirmed that inlet protection and a corresponding drainage area label, is being provided for all inlets that collect drainage from the limit of disturbance. JMT has also ensured that all DAs do not exceed ½ acre per the filter bag inlet protection detail on SR-7. Legend – Chapter 102.11 (a) (1)

   DCCD Comment (12/23/20): No further comment.

Legend – Chapter 102.11 (a) (1)

1. **DCCD Comment (11/20/20):** The symbol used for 12" CFS is the same as 24" CFS.

   JMT Response (12/14/20): The symbol used for the 24" CFS was updated in the legend.

   DCCD Comment (12/23/20): No further comment

2. **DCCD Comment (11/20/20):** Sheet SR-13 through SR-15 – why is the color blue (symbol) shown for drilling equipment area? When no exit or entry points are proposed?

   JMT Response (12/14/20): The workspace on Sheet SR-13 to SR-15 has been revised to color green, pipe stringing and welding area.

   DCCD Comment (12/23/20): No further comment.

Technical Deficiencies from DEP

1. **PADEP Comment (12/23/20):** No further comment.

2. **PADEP Comment (11/20/20):** Please confirm and demonstrate that the PNDI receipt/clearances, the Act 14 notifications, and the PHMC coordination includes the increase in the earth disturbance from 1.3 acre to 24.76 acres. If these items do not include the increase in the earth disturbance, please coordinate with each of these entities and provide updated correspondence documentation. [NOI/Application Checklist]

JMT Response (12/14/20): Please note that the additional LOD was included in the PNDI and PHMC documentation previously submitted during administrative review. For the PNDI, see the project boundary plan on page 2-3 of the PNDI receipt. For the PHMC, see the 20080817 Ltr from NV5 to PHMC, Consultation Request Package, 3rd Submittal, Attachment C.

Act 14 notification letters were resubmitted for the increased LOD to City of Chester, Borough of Trainer, Delaware County and Lower Chichester Township. Please find enclosed copies of the letters and receipts.

PADEP Comment (12/23/20): For the PNDI demonstration, for all proposed areas of earth disturbance associated with this application, we will need a copy of the PNDI search receipt(s), a copy of the specific project information (as requested in the PNDI search receipt) sent to each PNDI agency by the applicant, and proof of delivery to each PNDI agency. Please note that in following JMT's response, we reviewed the project boundary plan on page 2-3 of the PNDI receipt. From pages 2 and 3, it is difficult to see if all areas of earth disturbance associated with this application were included in the PNDI search. As part of the PNDI demonstration, please provide the specific information (as requested in the PNDI search receipt) sent to each PNDI agency by the applicant.

For the PHMC demonstration, for all proposed areas of earth disturbance associated with this application, we will need a copy of the PHMC Project Review Form(s) sent to the PHMC by the applicant, a copy of the attachments (map, description/scope of work, site plans/drawings, photographs, etc.) as listed on the PHMC form sent to the PHMC by the applicant, and proof of delivery to PHMC. Please note that in following the response letter dated December 11, 2020, we reviewed Attachment C in the PDF document named "20080817_Ltr_from_NV5_to_PHMC_Consultation Request Package_3rd Submittal.pdf." The mapping in this attachment does not identify all the proposed areas of earth disturbance associated with this application.

3. **PADEP Comment (12/23/20):** No further comment.

4. **PADEP Comment (12/23/20):** No further comment.

5. **PADEP Comment (12/23/20):** No further comment.

6. **PADEP Comment (11/20/20):** For clarification with the areas of site restoration, please label the five new concrete pads at the PECO meter station site on the PCSM plan drawings and the E&S/Site Restoration plan drawings. [102.8]

   JMT Response (12/14/20): Labels have been added to PCSM-5 and SR-38 for the five new concrete pad areas at the PECO meter station.

PADEP Comment (12/23/20): At the PECO meter station, it seems that the five concrete pads were labeled on sheets SR-38 and PCSM-5. However, there are other proposed features/objects on this plan that are not labeled. It is uncertain if these proposed features/objects are at the surface or below grade. Also, it is uncertain if these proposed features/objects will cause any increase in stormwater runoff. Please amend the plan to address these uncertainties.

7. **PADEP Comment (11/20/20):** When comparing the surface areas of the proposed buildings and the dry wells at the PECO meter station, it seems that dry well #1 has a greater loading ratio than the maximum recommended loading ratio presented in Appendix C of the PA BMP Manual. If the surface area of the dry well cannot be increased, please justify the larger loading ratio along with a recommendation from the geotechnical engineer and please increase the factor of safety associated with the infiltration rates to a number higher than 2. [PA BMP Manual]

   JMT Response (12/14/20): The footprint for dry well #1 was increased to an 8'x5'-2" rectangular precast structure. The footprint is 41.3 SF for a contributing impervious surface of 180 SF, resulting in a loading ratio of 4.4:1. This meets PADEP criteria, which states within Appendix C of the PA BMP Manual, that the maximum impervious loading ratio is 5:1.

   PADEP Comment (12/23/20): Since there is only one dry well detail, it seems that both dry wells (dry wells #1 and #2) have been increased to an 8'x5'-2" rectangular precast structure. Please confirm.

8. **PADEP Comment (12/23/20):** No further comment.

9. **PADEP Comment (12/23/20):** No further comment.

10. **PADEP Comment (12/23/20):** No further comment.

11. **PADEP Comment (12/23/20):** No further comment.

12. **PADEP Comment (12/23/20):** No further comment.

13. **PADEP Comment (12/23/20):** No further comment.

14. **PADEP Comment (11/20/20):** The Geotechnical Engineering Report states, "…the groundwater data was collected in late July during the dry season, and the seasonally high groundwater table may be higher in the springtime. Given water seepage was noted at the bottom of Test Pit TP-1, depending on the seasonally high groundwater table in the Spring, dry wells may not be feasible in this location, or the bottom elevations of the dry wells should be limited to a depth that is 2 feet higher than the

seasonally high groundwater table. The seasonally high groundwater table depth in this location should be investigated." For the PECO meter station site, please provide more information about the seasonally high groundwater table depth based on this recommendation in the Geotechnical Engineering Report in regards to the two proposed dry wells. [PA BMP Manual]

JMT Response (12/14/20): Section 6 of the Geotechnical Engineering Report was revised to include additional information for the seasonally high groundwater table. Per the Natural Resources Conservation Service, the depth to the water table in this location between March and April is 152 cm, or 5 ft (see Appendix D). The ground surface elevation of TP-1 is 14 ft; therefore, it is estimated that the seasonally high groundwater table elevation is 9 ft. As a result, it is recommended that the bottom of the dry well is constructed at a minimum bottom elevation of 11 ft, which provides a depth that is 2 feet higher than the seasonally high groundwater table per the guidelines of the Pennsylvania Stormwater Best Management Practices Manual, Appendix C, Protocol 2, Section 1. a.

PADEP Comment (12/23/20): The provided response and the amended geotechnical report does not explain the groundwater that was observed in test pit TP-1 at approximate elevation 7' in late July during the dry season. There is a concern that this groundwater that was observed could re-occur when the Dry Well #1 is supposed to be functioning. This groundwater may reduce the capacity of the drywell. Please amend the dry well design to include countermeasures to minimize the potential adverse impacts of this observed groundwater.

You must submit a response fully addressing each of the technical deficiencies set forth above. Please note that this information must be received within 30 calendar days from the date of this letter, on or before January 23, 2020, or DEP may deny the ESCGP-3 permit application.

Please submit 1 hard copy and 1 CD-ROM of the revised information to the Delaware County Conservation District, 1521 N Providence Rd, Media, PA 19063, and 1 electronic copy of the revised information to DEP at the DEP FTP Site.

If you believe that any of the stated deficiencies are not significant, instead of submitting a response to that deficiency, you have the option of requesting that DEP make a permit decision based on the information you have already provided regarding the subject matter of that deficiency. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency.

If you have questions about your application, please contact me by e-mail at christopsm@pa.gov or by telephone at 484-250-5152 and refer to Application No. ESG 01 00 19 001 (Phase 2B) to discuss your concerns or to schedule a meeting. You must attempt to schedule any meeting within the 30 calendar days allotted for your reply.

Sincerely,

Christopher Smith

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

cc: Ms. Shiny Mathew – Johnson, Mirmiran & Thompson (JMT)
Mr. Magargee - Delaware County Conservation District
Municipal Engineer - Lower Chichester Township
Municipal Engineer – Trainer Borough
Municipal Engineer – City of Chester
Mr. Smith
Mr. Hohenstein
Mr. Shankar
Mr. Rocco
Ms. Yordy
Re 30