



July 30, 2020

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

Re: Technical Deficiency Letter
Adelphia Gateway Project - Phase 2A
ESCGP-3 Permit Application No. ESG 01 00 19 001
Municipality: Lower Chichester Township
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

1. Your plan calls for trenches to be open with stock piled material in the roadway for up to thirty days. The roadway is curbed. How will you be preventing drainage problems? [Chapter 102.11 (a) (1)]
2. At a minimum, the E & S plan should address the separate documents for directional drilling and inadvertent release contingency plans as these documents relate to the conditions of the 401 Water Quality Certificate. [Chapter 102.11 (a) (1)]
3. Please add a note to Sheet SR-9 that the Tilghman Lateral 2B will be submitted as a permit amendment at a later date. [Chapter 102.11 (a) (1)]
4. Sequence of construction should address removal of erosion and sediment control

- devices once the site is stabilized. [Chapter 102.11 (a) (1)]
5. A stabilized construction entrance should be provided. The notes suggest one would be installed if determined to be needed. [Chapter 102.11 (a) (1)]
 6. Sheet SR-7 – inlet directly below Parkway Lateral does not illustrate inlet protection. [Chapter 102.11 (a) (1)]
 7. It seems that a portion of the project site drains to a receiving surface water (named Naaman's Creek) which is located in the State of Delaware. Based on the review of the Section 303 Integrated List (dated 2018) prepared by the State of Delaware, this surface water (Naaman's Creek) is impaired for Nitrogen, Phosphorus, and Enterococcus bacteria. At this point, without evidence to the contrary, these impairments may be related to siltation, and it will need to be reviewed as a siltation-impaired surface water. Following the ESCGP-3 instructions for an impaired surface water where the cause of the impairment is identified as siltation, please update the Section I. Antidegradation Analysis (for E&S and PCSM) of the application (and the other sections of the application regarding Siltation-Impaired) for this receiving surface water, accordingly, and that non-discharge alternatives and ABACT BMPs should be considered and employed. Further, any potential construction entrance(s) that may be located within this watershed will need to be upgraded to an ABACT construction access. Please add an upgraded ABACT construction access detail to the E&S Plans for this watershed. [ESCGP-3 Application]
 8. Please demonstrate in the applicant's response letter, the PCSM Narrative, and the PCSM Plan Drawings how the permittee and/or co-permittee will address each of the components (aka subsections) listed at 102.8(n) for the areas to be restored following 102.8(n) at part of this ESCGP-3 permit application. Please address subsections 102.8(b), (c), (e), (f), (h), (i), and (l) and when applicable, subsection (m) for areas to be restored following 102.8(n). [25 Pa Code § 102.8(n)]

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 August 30, 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 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
Mr. Smith
Mr. Hohenstein
Mr. Shankar
Mr. Rocco
Ms. Yordy
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