

August 6, 2020

Transcontinental Gas Pipeline Company, LLC
c/o Joseph Dean
2800 Post Oak Blvd, Level 11
Houston, TX 77056

Re: Technical Deficiency Letter #2
Erosion & Sediment Control Permit Application
Leidy South Project
DEP Application No. ESG830019002-00
APS No. 1003044; AUTH ID No. 1290753
Chapman & Leidy Townships, Clinton County
Jordan Township, Lycoming County
Fairmount Township, Luzerne County
Orange & Jackson Townships, Columbia County
Hegins Township, Schuylkill County

Dear Mr. Dean:

The Department of Environmental Protection (DEP) has reviewed your response to the April 3, 2020 Technical Deficiency Letter, received on June 1, 2020 for the above-referenced application/NOI and has identified the following continuing technical deficiencies. 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 deficiencies listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth the DEP's established means of satisfying the applicable regulatory and statutory requirements.

Technical Deficiencies

1. Notice of Intent (NOI):
 - a. In the recently submitted NOI Section E – Project Information, the total project area, and total disturbed area entries do not match the summed entries listed in NOI Supporting Information Section 1-1.1. Please revise. §102.6(a)(1)
 - b. On NOI resubmission, please clarify why “siltation impaired” is unchecked for existing use receiving waters in Section E.18. This was checked on the original NOI submission. §102.6(a)(1)
2. Lycoming County:
 - a. The compost filter sock (CFS) worksheet for Benton Loop has a “Draft” watermark on it. Additional silt socks that were not previously undersized are now showing

- as undersized and some slope lengths changed. Please provide the correct worksheet and ensure that all socks are properly sized. § 102.4(b)5(viii)
- b. Please provide a manufactures spec sheet for the ECM channel lining. This specific channel lining was not included in the spec sheets that were provided. § 102.4(b)5(viii)
 - c. Anti-seep collar detail was provided on sheet 22a of 22 in the E&S plan set, but the sizing worksheet was not included with the other standard worksheets. Please provide the sizing worksheet (E&S standard worksheet #18) or an equivalency. § 102.4(b)5(viii)
 - d. Please explain why several channels have a shift in dimensions from unvegetated to vegetated. Example Channel DC-BL-9 has a different total depth D and a different top width at D from the un-vegetated state to the vegetated state. §102.4(b)5(viii)
3. Columbia County:
- a. Technical Comment #9b – a field check of the site indicates that the slope length for compost filter sock does not stop at the property line and that additional flow from upslope properties should be included/accounted for. Please revise. §102.4(b)5(ix)
 - b. Technical Comment 10b - The table on the detail for the compost filter sock sediment trap on the detail sheet (page 22 of 22) indicates that 2 layers of 24-inch sock will provide a 4-foot berm height. This will not be the case. Please clarify that the third row of sock will be required to provide the stated 4 feet of height or show that a lesser height will be acceptable. §102.4(b)5(ix)
4. Schuylkill County:
- a. A spot check found maximum slope lengths exceeded at sock 3,4 and 5. Maximum slope lengths should conform to those provided in Figure 4.2 of the E&SPC Manual. Please revise. §102.11(a)(1)
5. Clinton County:
- a. Contractor Yard Identification: On the drawings, there is one contractor yard specified and an “Additional Temporary Work Space (ATWS)” that was identified on page 2 of 39 and detailed on page 24 of 39 of the Hensel Replacement. However, Section 2-1 Narrative refers to two contractor yards and a truck turn-around area. Please clarify and adjust the drawings and narrative as needed. §102.4(b)5(vi) & §102.4 (b)5(ix)
 - b. On the Hilltop Loop E&S-SR Drawing Sheet 18 of 22, please clarify what table is to be referenced for rock gradation/thickness on the Rip Rap Stream Bank Stabilization (RSS) detail. §102.4(b)5(ix)
 - c. In response to the PPC including contact info in the event of a spill located in section 1-10 of the Erosion and Sediment Control Plan Narrative, please be sure to include contact information for the Conservation District and DEP, if you would like a list of contacts from the Clinton County Conservation District, please contact our office. §102.4(b)5(ix)

6. Post Construction Stormwater Management (PCSM):

- a. The PCSM Report Worksheet 4 submitted with Compressor Station 620 is from Compressor Station 607. Please provide the correct worksheet. §102.8(g)(2)
- b. It is difficult to read the Trench Drain detail on Compressor Station 607 PCSM Sheet 6 of 7. Please include a legible detail and clarify where this is to be implemented. §102.8(f)(9)

Pursuant to 25 Pa. Code § 102.6(c) of DEP's rules and regulations, you must submit a response fully addressing each of the significant technical deficiencies set forth above. Please note that this information must be received within sixty (60) calendar days from the date of this letter, on or before October 5, 2020 or DEP may consider the application to be withdrawn by the applicant.

You may request a time extension in writing before October 5, 2020 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).

Please submit a digital copy of the revised E&S and PCSM plan to each County Conservation District and a digital copy of the revised information to the Department.

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 to 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. Please keep in mind that if you fail to respond, your application will be considered withdrawn.

Should you have any questions regarding the identified deficiencies, please contact Nick Rossi at 717.772.5667 or nicrossi@pa.gov and refer to Application No. ESG830019002-00, to discuss your concerns or to schedule a meeting. Please attempt to request a meeting within 15 days of the date of the letter to better ensure a meeting can be scheduled, held, and allow time for you to provide a response with the response time allotted for your reply. You may also follow your application through the review process via eFACTS on the Web at: <http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,



Rebecca M. Albert, P.G.
Environmental Group Manager
Regional Permit Coordination Office

cc: WHM Consulting, Inc. (by email)
Clinton County Conservation District (by email)
Lycoming County Conservation District (by email)
Luzerne County Conservation District (by email)
Columbia County Conservation District (by email)
Schuylkill County Conservation District (by email)
Leidy Township (by email)
Chapman Township (by email)
Jordan Township (by email)
Fairmount Township (by email)
Jackson Township (by email)
Orange Township (by email)
Hegins Township (by email)