



PITT-07-19-050

July 24, 2019

Mr. Christopher Smith, P.E.
Chief, Construction Permits Section
Waterways & Wetlands Program
Pennsylvania Department of Protection – Southwest Region
2 East Main Street
Norristown, Pennsylvania 19401

**Re: Incompleteness Review Responses -
Pennsylvania Pipeline Project – Major Amendment
HDD 0620 Permit Application No. ESG 0100015001
Middletown Township, Delaware County**

Dear Mr. Smith:

On behalf of our client, Sunoco Pipeline L.P. (SPLP), Tetra Tech, Inc. provides the following responses to the Pennsylvania Department of Environmental Protection (DEP) Incompleteness Review letter dated May 29, 2019, regarding the above-referenced Major Amendment. The supporting attachments represent clarifications or revisions to the original modification request. We are providing three hard copies containing this letter and supporting attachments.

For ease of your review, each DEP item is set forth verbatim below, followed by a narrative response with supporting attachments.

Comments and Responses to May 29, 2019 Incompleteness Review Letter

1. Notice of Intent (NOI)		
a.	Section E, Question 5 (page 5) - The Quad maps listed do not pertain to the Major Amendment in Delaware County. Please revise the list to only include the Quad maps for the Major Amendment.	The quad map list has been revised to only include the quad map for the major modification.
b.	Section E, Question 8 (page 5) - Please verify the response to this question in regards to the Major Amendment.	The response has been verified and has not changed.
c.	Section E, Question 11 (page 5) - Please address all applicable questions in this box	The response was revised to "NO" and an explanation is provided in the geohazard evaluation included as Attachment 12 of the E&S report.
d.	Section E, Questions 15 and 16 (page 6) - Please verify the response to these questions in regards to the Major Amendment.	The responses have been verified and have not changed.
e.	Section E, Question 18 (page 6) - Please verify the information listed for the Major Amendment. Please verify if	The receiving waters have been verified. The response has been

	the received waters for the Major Amendment are or are not siltation impaired.	edited to include the siltation impairment.
f.	Section G, (page 9) – Please verify the information submitted for this section as it pertains to the Major Amendment.	The response to this section has been edited to be specific to the major modification.
g.	Section H (page 10) - Please verify the response to "Is there an Act 167 Plan?" for the area of the Major Amendment.	The response to this section has been edited to be specific to the major modification.
h.	Section H (page 11) - Please include a completed Worksheet No. 10 with the application for the area of the Major Amendment.	Worksheet 10 has been added as an attachment to the NOI.
i.	Section H (page 11) - Letter a— Please check all that apply (PCSM BMPs and/or SR BMPs) in regards to the Major Amendment.	The response has been edited to check the "SR BMPs" box.
j.	Section I (page 14) Part 1 - Please complete the Antidegradation Analysis for the area of the Major Amendment. Please provide an explanation for the nondischarge BMPs that were not checked and an explanation of why the BMPs checked were utilized.	The response has been edited and explanations have been provided as requested.
2. NOI Completeness Checklist		
a.	Item 3.d. — Please provide project site runoff in the narrative for the Major Amendment.	A Project site runoff discussion has been provided in the E&S report narrative.
b.	Items 3.e and 7.e. — Please provide surface water classification in the narrative and plan drawings for the areas of the Major Amendment.	The Project surface water classification discussion has been provided in the E&S report and SR/PCSM report narratives.
c.	Item 3.g. — Please provide a specific sequence of construction for the Major Amendment.	The constructions sequence is provided on Sheet 0.03 of the E&S drawings.
d.	Item 3.j. – Please amend the plan drawings for the Major Amendment to include the maintenance program for BMPs.	The maintenance programs is provided on Sheet 0.03A of the E&S drawings.
e.	Item 3.i. — Please provide a legend, details/specifications on the plan drawings for the Major Amendment.	The legend and details/specifications are provided on sheets ES-0.01 through ES-0.23 of the E&S drawings.
f.	Item 3.1. — Please provide Attachment 13 with information regarding the Major Amendment.	The Geohazard Evaluation is provided as Attachment 12 of the E&S report and as an Attachment to the NOI.

g.	Items 3.p. and 7.o. — Antidegradation Requirements: Depending on the receiving waters for the area of the Major Amendment, please update the PCSM narrative. Please note that Siltation Impaired receiving waters have antidegradation requirements.	The PCSM narrative has been updated to include antidegradation discussion.
h.	Item 5.b. — Please provide documents addressing this item.	Communications with PHMC have been added to Section 6.

SPLP appreciates your timely review of this response. Should you have questions regarding this correspondence, please do not hesitate to contact me at 412-921-8163 or via e-mail at Robert.Simcik@tetrattech.com.

Sincerely,



Robert F. Simcik
Project Manager
Tetra Tech, Inc.

cc: File 212IC-PB-00387
J. Hohenstein, PADEP Southeast Region
M. Wheeler, Delaware County Conservation District
M. Gordon, Sunoco Pipeline L.P.
C. Embry, Sunoco Pipeline L.P.
M. Styles, Sunoco Pipeline L.P.
L. Gremminger, Energy Transfer
B. Schaeffer, Tetra Tech

SECTION H. POST CONSTRUCTION STORMWATER MANAGEMENT (PCSM) AND/OR SITE RESTORATION(SR) PLAN

See NOI Instructions for additional guidance with PCSM Plans

PCSM/SR BMPs should be designed to use natural measures to eliminate pollution, infiltrate runoff, not require extensive construction/maintenance, promote pollutant reduction, and preserve the integrity of stream channels. All PCSM/SR BMPs proposed in the PCSM/SR Plan must be designed in accordance with Ch. 102, Ch. 78a for unconventional operations, Ch. 78 for conventional operations and the *Pennsylvania Stormwater Best Management Practices Manual (Stormwater BMP Manual)* (363-0300-002). If alternate design criteria are utilized for the proposed project, they must have prior approval by the Department, or the NOI Application will be returned to the Applicant.

After construction is completed, how much of the entire disturbed area will be restored to meadow in good condition or better, or existing conditions? All Partial None

Include PCSM narrative and drawings for remaining impervious area. Also include a map showing the proposed contours of the site restoration plan.

If there are additional stages of the project prior to permit termination or expiration, list the stages and provide the documents required by subsection 'a' to section 'g' for each stage (e.g. partial restoration or changes to the amount of compacted areas, gravel, and/or impervious areas). Upload a narrative for each additional stage in addition to the drawings.

EXAMPLE

Stage No	Stage Name	PCSM Plan	SR Plan
Stage 1		<input type="checkbox"/>	<input type="checkbox"/>
Stage 2		<input type="checkbox"/>	<input type="checkbox"/>
Stage 3		<input type="checkbox"/>	<input type="checkbox"/>
Stage 4		<input type="checkbox"/>	<input type="checkbox"/>

Act 167 Consistency. Check those that apply.

Is there an Act 167 Plan? Yes No

The attached PCSM/SR Plan is consistent with an applicable approved Act 167 Plan.

Complete the following for all approved Act 167 Stormwater Management Plans. (Use additional sheets if necessary)

Act 167 Plan Name _____ Date Adopted _____ Consistency Letter Included

Chester Creek Watershed Vol. 1 _____ June 2002 _____ Verification Report Included

Note: A consistency letter is not required if a verification report is provided. See NOI Instructions. The PCSM/SR Plan must satisfy either sub paragraph 1, 2, or 3 below. Check those that apply.

1. Act 167 Plan approvals on or after January 2005 – The attached PCSM/SR 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. Box 1 must be checked if a current, DEP approved Act 167 plan exists.
2. The PCSM/SR Plan meets the standard design criteria from sections 102.8(g)(2) and (3) and the *Stormwater BMP Manual*. For projects involving oil and gas activities authorized by a permit issued under Chapter 78 or Chapter 78a (well pads) or pipelines and other similar utility infrastructure, post construction stormwater management requirements are met for all areas that are restored to preconstruction conditions or to a condition of meadow in good condition or better. [Note: PCSM plans must meet both the volume and rate requirements in the regulations, which are provided in the 2 sections mentioned in this paragraph].
3. Alternative Design Standard – The attached PCSM/SR Plan was developed using approaches as provided in 102.8(g)(2)(iv) and 102.8(g)(3)(iii). Demonstrate/explain in the space provided below how this standard will be either more protective than what is required in 102.8(g)(2) and 102.8(g)(3) or will maintain and protect existing water quality and existing and designated uses.



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

May 21, 2019

Tetra Tech
Attn: Rob Peltier, M.A., RPA
301 Ellicott Street
Buffalo, NY 1420

RE:ER 2013-1862-042-II – DEP: Pennsylvania Pipeline Project, Negative Survey Form for Glenn Riddle/0620 Modification Area, Middletown Township, Delaware County

Dear Mr. Peltier:

Thank you for submitting the Negative Survey Form for the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Based on the negative results of this investigation, we agree with the recommendation that no further archaeological work is necessary within the surveyed area.

If you have any questions or comments concerning our review, please contact Mark Shaffer at mshaffer@pa.gov or (717) 783-9900.

Sincerely,

Douglas C. McLearn, Chief
Division of Environmental Review



Negative Survey Form

(This form may be used if the Phase I guidelines have been followed and no cultural resources have been identified.)

1. Project Identification:

ER Number 2013-1862-042

Project Name &/or Agency Tracking #: Pennsylvania Pipeline Project

Agency: PADEP Applicant: Tetra Tech

Preparers Name and affiliation: Rob Peltier/Tetra Tech, Inc.

Date Prepared: 4/18/19

Project Area County/Municipality (list all)

County	Municipality
Delaware County	Middletown Twp.

2. Project Setting: (check all that apply)

- urban/suburban; rural
- upland; floodplain/terrace (active; stable terrace)

7.5" USGS Quadrangle(s) Name (list all):

Name	Date
Media	1999

Physiographic Zone(s)(list All. Use DCNR Map 13 compiled by W.D. Sevon, Fourth Edition, 2000.):

Physiographic Zone
Piedmont Upland (39)

Project Area Drainage(s), (list all) (Sub-basin and Watershed can be obtained from CRGIS):

Sub-basin	Watershed	Major Stream	Minor Stream
3	G	Lower Delaware River	

3. Basic Field Conditions:

(Text fields will expand as needed. Please be complete)

Area of APE / Project Area in hectares: 2.23 ha subject to shovel testing and pedestrian survey

General Description of APE / Project Area: Survey area consists of all new workspace associated with the conversion from HDD to a direct pipe, a conventional auger bore under Glen Riddle Road, and conventional open trench construction through a wetland and stream crossing.

Type of Proposed Project / Impact: HDD conversion to direct pipe/Conventional auger/Conventional open trench

Date of field investigation(s): 4/2/2019

Description of Field Conditions including percentage of surface visibility:

Cool and sunny field conditions. Low grass with a 60 percent surface visibility.

4. Previously Recorded Archaeological Sites within APE / Project Area and not relocated by this project:

PASS Site Number	Reason not re-located

5. Survey Methodology: (check all that apply to the entire project; attach any supporting documents)

- PASS file Research Contacted Local Historical Association/Commission/Park/Etc.
 Informant Data Historic Records/Maps/Photos SCS Soil Maps
 Surface Survey Geomorphological Borings STPs
 Test Units Geomorphological Trenches Remote Sensing
 Other: Pedestrian Walkover Survey

Professional Geomorphologist was Present or Not Present During Field Investigations

Name: _____ Affiliation: _____

Formal Geomorphological Report Prepared: Yes No

6. Results: (Describe both the design and the results of every methodology checked in 5. Include the size and condition of the area tested by each.)

No cultural resources identified. Details provided below.

7. Statewide Pre-Contact Probability Model Analysis: (Use the model from CRGIS to determine portions of the project area that were located within each sensitivity tier and list all testing methods used within each tier. If more than one method was used, estimate the percentage of the tier tested by each method. In the Sites Located section, include Isolated Finds for which a number is assigned.)

Sensitivity Tier	Area within this Tier	Percent of Total Project Area	Method(s) Used to test this tier (Use list from 5 above. Include % if multiple.)	Number of Sites Located
High	3200 sq. m.	23%	Shovel Testing 80%, Pedestrian Walkover 20%	0
Moderate	4657 sq. m.	33 %	Pedestrian Walkover 80%, Shovel Testing 20%	0
Low	6101 sq. m.	44%	Shovel Testing 80%, Pedestrian Walkover 20%	0

8. Required Attachments:

- 7.5' USGS Quadrangle Map delineating APE / Project Area
 Project map showing testing strategy(ies)
 Testing strategy justification / predictive model
 Supporting photographs with descriptions of view and view direction
 Engineering / Project Plans if prepared
 Geomorphological Report if prepared
 Representative excavation profiles and description

List all other attachments to this Negative Survey Form:

Attachment Type
Attachment A – Project Location on USGS
Attachment B – Phase I Archaeological Investigations
Attachment C – Project Photographs/Locations Map
Attachment D – Shovel Test Summary

ER 2013-1862-042**GLEN RIDDLE / 0620 MODIFICATION AREA****MIDDLETOWN TOWNSHIP, DELAWARE COUNTY****MODIFICATION DESCRIPTION and SURVEY RESULTS**

Sunoco Pipeline L.P. (SPLP) requests a major permit modification for a change in the installation method of the 20-inch and portions of the 16-inch diameter pipelines previously permitted as the 0620 Horizontal Directional Drill (HDD) in Middletown Township, Delaware County. This permit request is to convert the HDD to a direct pipe through residential and commercial areas along Wildwood Avenue, South Pennell Road, Riddlewood Drive, War Trophy Lane, Glenn Riddle Road, and the Southeast Pennsylvania Transportation Authority's (SEPTA) Railroad, in Middletown Township, Delaware County. The modification includes a conventional auger bore under Glen Riddle Road and the SEPTA railroad and conventional open trench construction through a delineated wetland (WL-11) and a stream (S-I2).

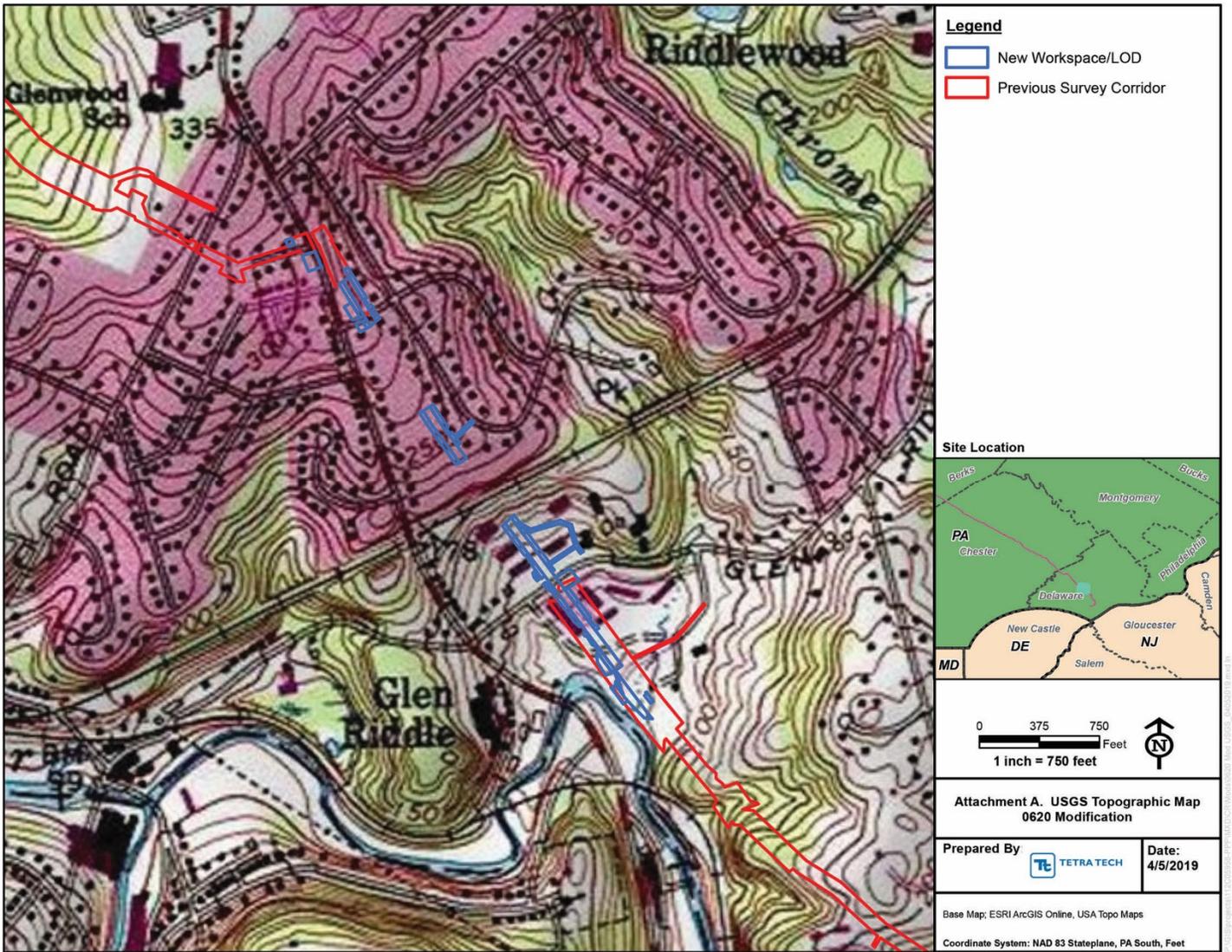
A desktop review, background research, and site file search were conducted for the Glen Riddle modification prior to field reconnaissance and survey. Background research indicated that a some of the required workspace, the modification's Limit of Disturbance (LOD) or Area of Potential Effect (APE) has been previously surveyed for cultural resources.

The total APE for the modification area is approximately 5.52 acres (ac) (2.23 hectares [ha]). Approximately 2.07 ac (0.84 ha) of the total APE had been previously surveyed by Tetra Tech in 2015. These areas were subjected to photodocumentation and limited opportunistic shovel testing. The remaining 3.45 ac (1.40 ha) of testable APE was subject to systematic subsurface shovel testing, pedestrian survey, and photodocumentation. Tetra Tech conducted a Phase I archaeological survey of the modification area on April 2nd, 2019. An existing utility corridor and temporary access road west of War Trophy Lane and adjacent to existing residences was tested with eight shovel tests. Shovel tests X1 thru X6 revealed a brown (7.5YR 4/3) silty loam Ap-horizon to an approximate depth of 22 centimeters below surface (cmbs). Beneath, a brown (7.5YR 5/4) silty clay loam B-horizon was encountered. Shovel test X2 contains fill materials. Shovel tests X7 and X8 revealed a brown (10YR 4/2) silty loam Ap-horizon, and a yellowish brown (10YR 5/6) silty clay loam B-horizon with an approximate interface depth of 15 cmbs. Areas adjacent to the intersection of Wildwood Avenue and South Pennell Road were subjected to seven shovel tests (X9 through X15). These shovel tests were determined to be disturbed and comprised of varying levels of fill. Areas along the north and south side of Riddlewood Drive were tested with ten shovel tests (X16 through X25). On the northside of Riddlewood Drive, shovel tests X16 thru X23 revealed a brown (10YR 4/4) silty loam Ap-horizon to an approximate depth of 21 cmbs. Beneath, a yellowish brown (10YR 5/6) silty clay loam B-horizon was encountered. Shovel test X19 contained fill materials. Two shovel tests (X24 and X25) were excavated on a somewhat flat area on the south side of Riddlewood Drive. Shovel tests X24 and X25 exhibited similar soil profiles as the tests X16 through X23. Two opportunistic shovel tests (X26 and X27) were excavated on somewhat flat terrain adjacent to Martin's Lane within a previously surveyed location. Approximately 147 ft (45 m) southwest of test X27, a final shovel test (X28) was excavated in a location adjacent to a Chester Creek. Shovel Test X28 was excavated to a depth of 103 cmbs and exhibited a typical floodplain profile. Shovel test results can be viewed in Attachment D. In addition to the shovel testing, each location within the APE was subjected to a full pedestrian survey and photodocumentation.

No cultural material or archaeological sites were identified during the Phase I archaeological survey and no further cultural resource investigations are recommended. The construction modification, as proposed, will have no adverse effect on cultural resources.

Attachment A includes the Glen Riddle/0620 modification area on a USGS topographic map. Attachment B also depicts the proposed LOD/APE, as well as previously surveyed areas. Attachment C1 offers representative photographs of the Glen Riddle/0620 modification area, while photograph locations are depicted on Attachment C2. Attachment D is a table containing shovel test profiles.

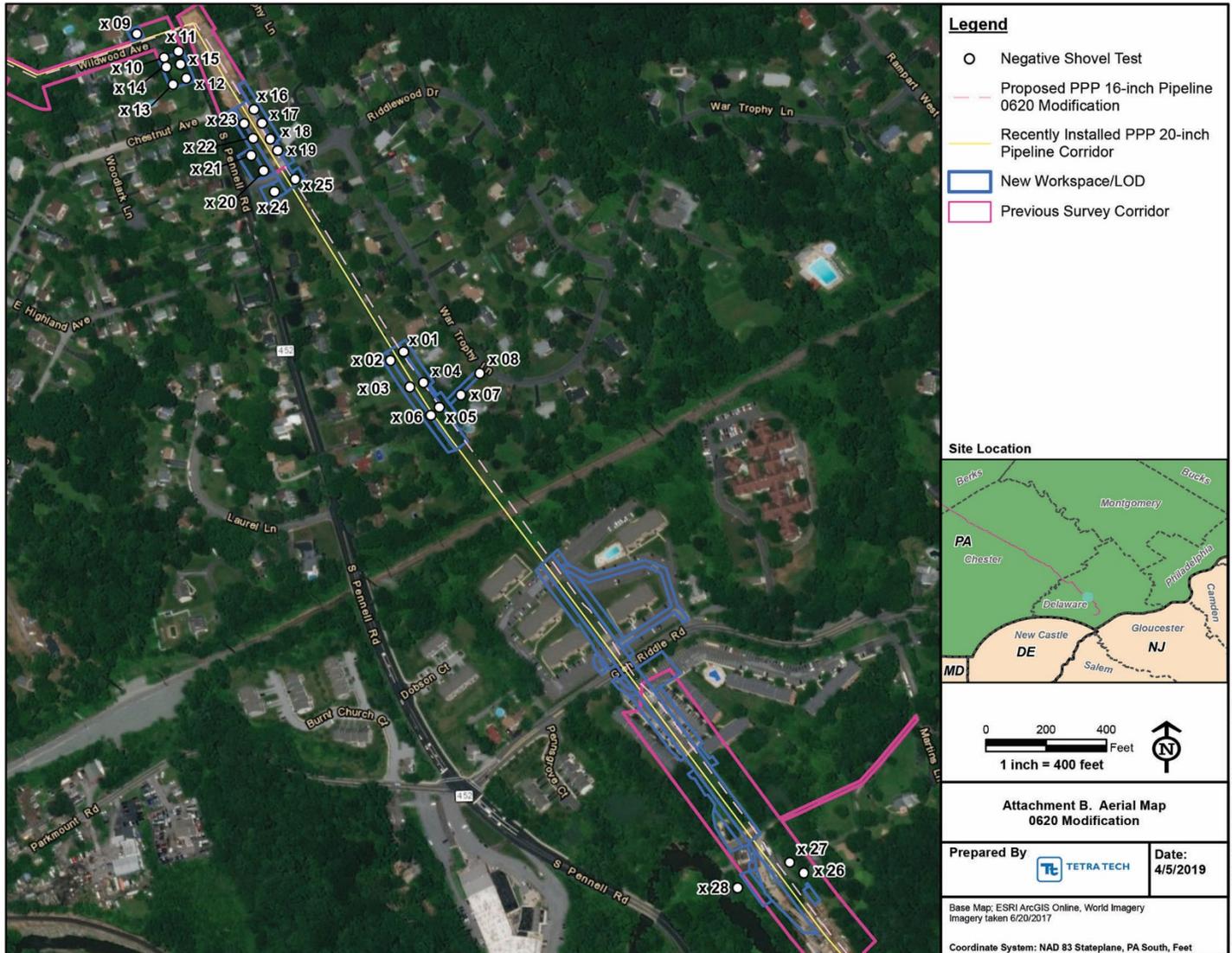
Attachment A: Glen Riddle Modification Area on USGS Topographic Map





Negative Survey Form

Attachment B: Phase I Archaeological Investigations



Attachment C1: Project Photographs



1. View of APE within existing utility corridor, west of adjacent residences along War Trophy Lane. Area subjected to subsurface investigations. Facing northwest.



2. View of APE within existing utility corridor, west of adjacent residences along War Trophy Lane. Area subjected to subsurface investigations. Facing northwest.



3. View an existing utility corridor outside of APE, west of War Trophy Lane. Area subjected to pedestrian survey. Facing southeast.



4. View of temporary access road perpendicular to War Trophy Lane. Area subjected to subsurface investigations. Facing southwest.



5. View of APE adjacent to the intersection of Wildwood Avenue and South Pennell Road. Area subjected to subsurface investigations and determined to be disturbed. Facing north.



6. View of APE north of Riddlewood Drive. Area subject to subsurface investigations along the corridor perimeter. Facing northwest.



7. View of APE south of Riddlewood Drive. Area subject to subsurface investigations. Facing southwest.



8. View of APE south of Riddlewood Drive. Area subject to subsurface investigations. Facing southeast.



9. View of APE north of Riddlewood Drive. Area subjected to subsurface investigations. Facing northwest.



10. View of APE north of Glenn Riddle Road (Glenn Riddle Station Apartments). Area impacted by modern development, subjected to pedestrian and photodocumentation. Facing southeast.



11. View of area south of Glen Riddle Road, within previously surveyed location. Area subject to pedestrian walkover and photodocumentation. Facing northwest.



12. View of area south of Glen Riddle Road, within previously surveyed location. Area was subjected to two opportunistic shovel tests. Facing southeast.

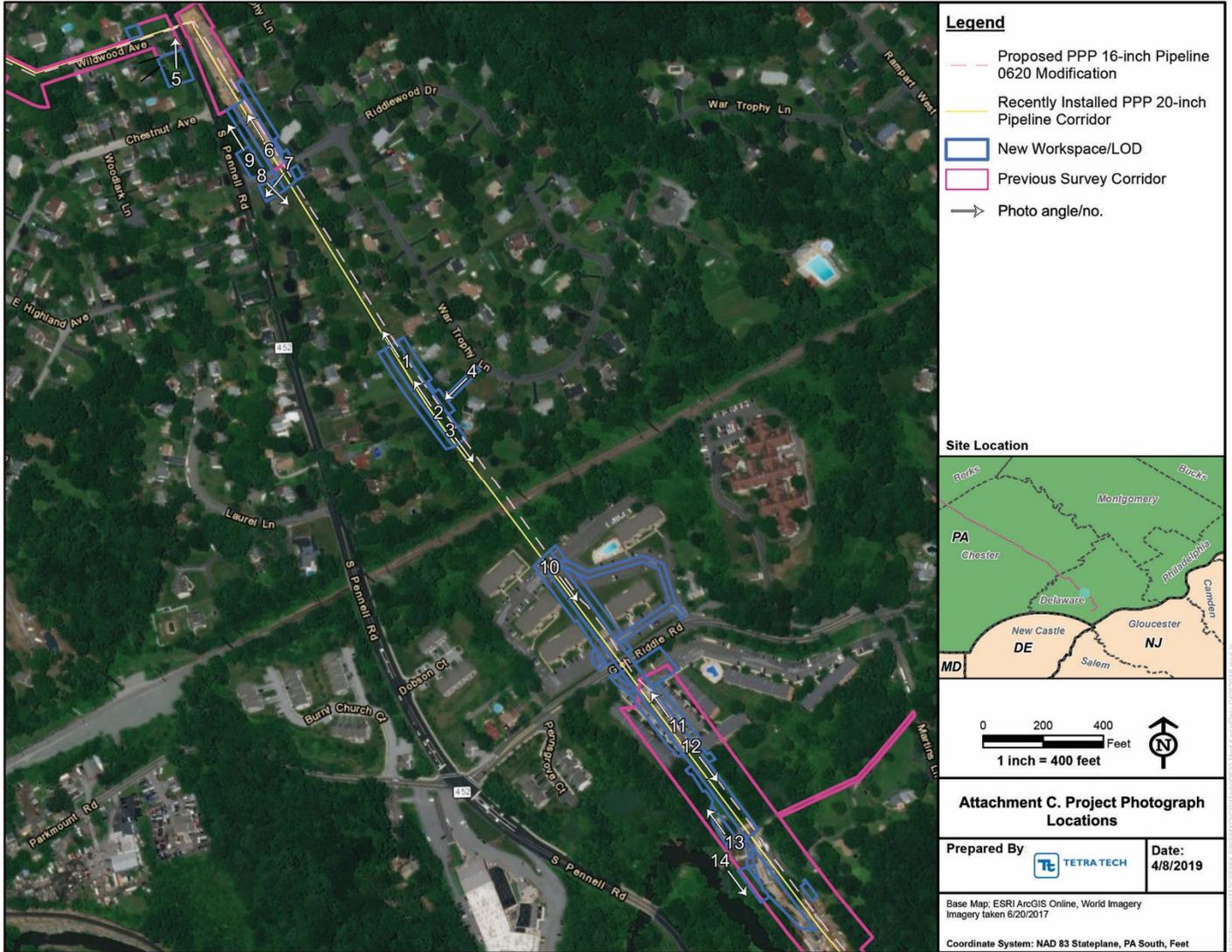


13. View of area south of Glen Riddle Road and west of Martin’s Lane, previously surveyed area. Area subject to limited shovel testing and pedestrian walkover and photodocumentation. Facing northwest.



14. View of area south of Glen Riddle Road, west of Martin’s Lane, and east of Chester Creek. Although area was previously surveyed, limited shovel testing was conducted. Facing southeast.

Attachment C2: Project Photograph Locations



Attachment D: Shovel Test Summary

Shovel Test	Strat/Level	Depth (cm)	Soil	Notes
X1	1	0-38	7.5YR 4/3 Si Lo	Rocky
	2	38-48	7.5YR 5/4 Si Cl Lo	
X2	1	0-21	10YR 4/6 Cl Lo	Disturbed
	-	21+	-	FILL
X3	1	0-23	7.5YR 4/3 Si Lo	Rocky
	2	23-33	7.5YR 5/6 Si Cl Lo	
X4	1	0-21	7.5YR 4/3 Si Lo	Rocky
	2	21-31	7.5YR 5/4 Si Cl Lo	Rocky
X5	1	0-22	7.5YR 4/3 Si Lo	
	2	22-33	7.5YR 5/4 Si Cl Lo	
X6	1	0-19	7.5YR 4/3 Si Lo	
	2	19-30	7.5YR 5/4 Si Cl Lo	Rocky
X7	1	0-20	10YR 4/2 Si Lo	
	2	20-30	10YR 5/6 Si Cl Lo	
X8	1	0-10	10YR 4/2 Si Lo	
	2	10-26	10YR 5/6 Si Cl Lo	
X9	1	0-26	10YR 4/4 mottled w/ 10YR 3/2 Cl Lo	FILL
	2	26-40	10YR 5/4 mottled w/ 10YR 3/2 Si Cl Lo	FILL
X10	1	0-10		FILL
	-	10+	-	ROCK IMPASSE
X11	1	0-20	10YR 4/4 mottled w/ 10YR 3/2 Cl Lo	FILL
	2	20-38	10YR 5/6 mottled w/ 10YR 3/2 Si Cl Lo	FILL
	-	38+	-	ROCK IMPASSE
X12	1	0-30	10YR 5/4 mottled w/ 10YR 3/2 Si Cl Lo	FILL
	-	30+	-	ROCK IMPASSE
X13	1	0-42	10YR 5/4 mottled w/ 10YR 3/2 Si Cl Lo	FILL
	-	42+	-	ROCK IMPASSE
X14	-	-	-	FILL/GRADED LOT
X15	-	-	-	FILL/GRADED LOT
X16	1	0-19	10YR 4/4 Si Lo	
	2	19-30	10YR 6/4 Si Cl Lo	
X17	1	0-21	10YR 4/4 Si Lo	
	2	21-31	10YR 6/4 Si Cl Lo	
X18	1	0-12	10YR 4/4 Si Lo	
	2	12-23	10YR 5/6 Si Cl Lo	
X19	-	-	-	FILL
X20	1	0-24	10YR 4/4 Si Lo	
	2	24-36	10YR 5/6 Si Cl Lo	
X21	1	0-20	10YR 4/4 Si Lo	
	2	20-30	10YR 5/6 Si Cl Lo	
X22	1	0-21	10YR 4/4 Si Lo	
	2	21-31	10YR 5/6 Si Cl Lo	
X23	1	0-19	10YR 4/4 Si Lo	
	2	19-31	10YR 5/6 Si Cl Lo	
X24	1	0-31	10YR 4/4 Si Lo	
	2	31-42	10YR 3/3 Si Lo	
	3	42-55	10YR 5/6 Si Cl Lo	
X25	1	0-23	10YR 4/4 Si Lo	
	2	23-33	10YR 5/6 Si Cl Lo	
X26	1	0-41	10YR 4/3 Si Lo	
	2	41-51	10YR 5/6 Si Cl Lo	
X27	1	0-36	10YR 4/3 mottled w/ 10YR 3/2 Si Lo	
	2	36-46	10YR 5/6 mottled w/ 10YR 6/4 Si Cl Lo	
X28	1	0-60	10YR 4/4 Si Lo	
	2	60-90	10YR 4/3 Sa Lo	WET
	3	90-103	7.5 YR 4/4 Sa Cl	COBBLES