



April 24, 2020

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

Re: Technical Deficiency Letter
Adelphia Gateway Project - Phase 1
ESCGP-3 Permit Application No. ESG 01 00 19 001
Municipalities: Lower Chichester Township, Concord Township, East Goshen
Township, East Whiteland Township, East Pikeland Township, West Rockhill
Township, Thornbury Township, Perkiomen Township, Richland Township, and
Skippack Township
Counties: Bucks, Chester, Delaware, and Montgomery Counties

Dear Mr. Valori:

The Department of Environmental Protection (DEP), the Bucks County Conservation District (BCCD), the Chester County Conservation District (CCCD), the Delaware County Conservation District (DCCD), and the Montgomery County Conservation District (MCCD) have reviewed the above referenced ESCGP-3 permit application, and DEP, DCCD, and MCCD 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.

Remaining Technical Deficiencies from DCCD, MCCD, and DEP

Technical Deficiencies from DCCD

All comments from DCCD refer to regulatory citation of Chapter 102.11(a)(1)

Marcus Hook Compressor Station:

1. DCCD Comment (2/25/20): L.O.D. expanded to impact two existing drainage swales and storm sewer outfalls. No erosion control provided, no swale designs and calculations for

reinstallation and stabilization.

.....**ADDRESSED**

2. DCCD Comment (2/25/20): An 18" F.S. placed across one stormwater outfall, and also to a disturbed area which is unacceptable for erosion and sediment control. Swales and disturbed area along New Castle County, DE, border no sediment control provided.

.....**ADDRESSED**

3. DCCD Comment (2/25/20): Sequence of Construction Item 5 - install the MRC during final stages of site construction, but the only step before this item is the installation of compost filter sock.

.....**ADDRESSED**

4. DCCD Comment (2/25/20): No erosion and sediment control provided for the construction of the MRC to prevent disturbed areas from draining to the facility or to temporary protect the outlet structure top of grate until facility is stabilized. This is an upslope diversion, so why two different linings?

Follow-up Comments:

My assumption is that you plan to place a 24" circle of compost filter sock around the existing pipe where MRC 1 is to be installed. It is labeled as a Compost Filter Sock Trap, but no design calculation were submitted, and the trap detail did not suggest a design for the Transco Site. The standard detail suggests it would be Compost Filter Socks of 24, 18. And 12. Please clarify.

5. DCCD Comment (2/25/20): The plan does not label this endwall at the MRC, and it could not be determined whether or not a design detail and calculations have been prepared for the rock rip apron illustrated.

.....**ADDRESSED**

Transco Meter Station:

1. DCCD Comment (2/25/20): Compost Filter Sock No. 4 is not placed on the contour.

.....**ADDRESSED**

2. DCCD Comment (2/25/20):

Rock lined Channel No. 2 and riprap apron from storm-tank infiltration system does not discharge to a surface water. Please provide a discharge analysis that meets the standard Item 15 on page 161 and Items 1—3 of page 439 of the E&SPC Manual.

JMT Response (3/24/20): The PCSM and E&S Narratives were updated to include an off-site discharge analysis for the existing swales at Marcus Hook and Transco, see PCSM Appendix D.3.

Follow-up Comments:

In the previous submission, the applicant had the channels in all the way to the wetland line and removed them from this submission for some unknown reason. The applicant does not propose level spreaders, and the applicant does not provided photo from the discharge to the surface water.

3. DCCD Comment (2/25/20): ES-9 list CH-2 design detail as temporary, then temporary lining of SC150, and then permanent lining as R-3. Also, the table points to detail and stating temporary geotextile lining — it should read just geotextile lining. Finally, it has a column T (FT) 0.25. If it is a representative of t or rock lining placement thickness, it should be 9 inches. It would also be preferred if the table would also list location. Freeboard must be a minimum of 0.5 feet calculations state 0.25 feet.

Follow-up Comments:

- 1. Design Detail still notes that geotextile under rip rap is temporary**
- 2. CH-2 Design Detail – Dimension B- Should be the design flow depth, plus the freeboard. I am making an assumption that 0.21 ft is the design flow depth. E&S Calculations were not submitted or labeled as one of the electronic submission items.**

4. DCCD Comment (2/25/20): Detail for rock filter/check dam are all listed as used in Quakertown. Where is the detail for rock filters used at Marcus Hook?

.....**ADDRESSED**

ABACT Controls:

1. DCCD Comment (2/25/20): The two smaller sites, Chester Creek Blow-Down and Mainline Valve 1, are impaired for Siltation. They both use Compost Filter Sock. But they would both be deficient because they do not call for the use of an ABACT for Construction Access.

.....**ADDRESSED**

Technical Deficiencies from MCCD

Sheet ES-21 Comments

A. Plan Drawings §102.4(b)(5)(ix)

1. **Previous Comment:** The ends of the proposed compost socks should point sufficiently upslope to create adequate pooling of runoff for the settling of sediment and to prevent end-around flows. For example, 18” socks should be pointed upslope at least 18”-24” upslope in elevation difference to ensure that end-around flows are avoided. Per the E&S Manual, pages 61 & 62, “The ends of sediment barriers should be turned upslope at 45 degrees to the main barrier alignment for a distance sufficient to elevate the bottom of the barrier ends to the elevation of the top of the barrier at the lowest point. This is to prevent runoff from flowing around the barrier rather than through it.
Subsequent Comment: End of proposed compost sock do not appear to be sufficiently pointed upslope for example, Compost socks 1, 3, 4, 5, 6 and 7.
2. **Previous Comment:** Silt fence should be shown exactly parallel to existing contours. Maximum deviation from level grade should be 1%, and not extend for more than 25 ft.
Subsequent Comment: Please refer to compost socks 1, 3, 5, 6 and 7.
3. **New Comment:** There appears to be a gap in the E&S controls located between compost socks 4 & 7. Please revise.
4. **New Comment:** Please verify how the two discharge pipes to the north of the rock construction entrance will be allowed to pass through the site. It appears that they are discharging straight into the construction entrance.
5. **New Comment:** Please verify how the construction entrance wash water will be handled.

Sheet ES-22 Comments

A. Plan Drawings §102.4(b)(5)(ix)

1. Inlets/Inlet Protection

Previous comment: Please provide the drainage areas to the proposed inlet protection on sheet ES-22.

Subsequent Comment: The drainage areas provided to the inlet protections appear to exceed the maximum drainage areas allowed to the inlet protect. Please revise.

2. **Previous Comment:** It appears that the maximum slope length has been exceeded for several sections of silt fence. Was not able to verify slope lengths for compost sock located on sheet ES-22 due to insufficient upslope contours. Please revise.
Subsequent Comment: Was still not able to verify the slope lengths going to proposed compost filter socks since adequate upslope contours did not appear to be provided.
3. **Previous Comment:** The ends of the proposed compost socks should point sufficiently upslope to create adequate pooling of runoff for the settling of sediment and to prevent end-around flows. For example, 18” socks should be pointed upslope at least 18”-24” upslope in elevation difference to ensure that end-around flows are avoided. Per the E&S Manual, pages 61 & 62, “The ends of sediment barriers should be turned upslope at 45 degrees to the main barrier alignment for a distance sufficient to elevate the bottom of the barrier ends to the elevation of the top of the barrier at the lowest point. This is to prevent runoff from flowing around the barrier rather than through it.
Subsequent Comment: End of proposed compost sock do not appear to be sufficiently pointed upslope.
4. **Previous Comment:** Compost sock/Silt fence should not be shown within areas of proposed grading/disturbance.
Subsequent Comment: Appears to still be areas were compost sock is shown through grading. For example, compost socks CFS-1 and CFS-2.
5. **New Comment:** Please verify that compost sock CFS-4 is adequate to control wash water from the construction entrance.

Sheet ES-23 Comments

A. Plan Drawings §102.4(b)(5)(ix)

1. **Previous Comment:** The ends of the proposed compost socks should point sufficiently upslope to create adequate pooling of runoff for the settling of sediment and to prevent end-around flows. For example, 18” socks should be pointed upslope at least 18”-24” upslope in elevation difference to ensure that end-around flows are avoided. Per the E&S Manual, pages 61 & 62, “The ends of sediment barriers should be turned upslope at 45 degrees to the main barrier alignment for a distance sufficient to elevate the bottom of the barrier ends to the elevation of the top of the barrier at the lowest point. This is to prevent runoff from flowing around the barrier rather than through it.
Subsequent Comment: End of proposed compost sock do not appear to be sufficiently pointed upslope.
2. **New Comment:** There appears to be proposed grading to the southern end of compost sock CFS-1 that is not being controlled by an E&S BMP. Please revise.

B. Overall Miscellaneous

1. Please note that a resubmission fee is necessary. Please refer to the MCCD E&S Plan Review Application for further information.
2. Please take note that MCCD will not accept “piecemeal” plan revisions. All revisions must be submitted as part of a complete application package unless specifically otherwise agreed and allowed by the reviewer. Additionally, “piecemeal” applications could lead to the project being withdrawn if the complete set is not submitted by the due date.

Technical Deficiencies from DEP

1. DEP Comment (2/25/20): For each Managed Release Concept (MRC) Best Management Practices (BMP) proposed for the above-referenced project, the professional engineer should document and demonstrate that the specific MRC BMP design addresses each and all of the 13 MRC design standards listed in the MRC document dated May 15, 2019 (the design standards start on page 4 of the MRC document), in narrative form with cross references to the specific location in the Post Construction Stormwater Management (PCSM) report. We have attached a courtesy template for the applicant’s use to address the 13 MRC design standards. For each number or justification used to demonstrate that the design addresses the 13 design standards, the engineer will need to provide a specific page number in their PCSM report that reflects that number or justification. We need this information to verify that the numbers or justification are correct as modeled or calculated. Also, all hydrographs need to include the supporting and input data for hydrology and hydraulics associated with the hydrograph. Please make sure to include or account for any basin bypass areas in the design standards. This documentation/ demonstration should be provided in the respective section or appendix of the PCSM Report for each MRC BMP. [25 Pa. Code § 102.11(b)]

1. JMT Response (3/24/20): A courtesy template has been submitted to document and demonstrate that the specific MRC BMP design addresses each and all of the 13 MRC design standards listed in the MRC document dated May 15, 2019 (the design standards start on page 4 of the MRC document), in narrative form with cross references to the specific location in the Post Construction Stormwater Management (PCSM) report. This is attached to this letter, and also included in Appendix D.2, Supporting Calculations, for Quakertown and Marcus Hook Compressor Stations.

1. DEP Comment April 24, 2020: This comment was partially addressed by the applicant/consultant.

For Design Standard 1 of the MRC BMP at Quakertown – Please explain why 0 cubic feet is acceptable for being removed by the underdrain. Please explain how the runoff from the 1.2-inch/2-hour storm from the contributing watershed, that the MRC is intended to treat, will be captured and managed by the MRC BMP, filtered through vegetated media, or treated and

filtered to the extent practicable through the on-site undisturbed soils or other acceptable treatment systems.

For Design Standard 1 of the MRC BMP at Marcus Hook, please clarify the calculation and reporting of the evapotranspiration volume. This calculation does not seem to apply to the May 15, 2019 version of the MRC guidance document.

For Design Standard 2 of the MRC BMP at Quakertown - Please explain why the 2-inch/24-hour storm was used for this design standard. Depending on the explanation, please correct the design storm to analyze the outflow to be "1.2-inch/2-hour" (instead of 2-inch/24-hour). Further, it seems from the HydroCAD model that the outflow is 0.00 cubic feet per second (cfs) (instead of 0.01 cfs) for 1.2"/2-hour storm. Please verify and revise the responses in the "MRC – 13 Design Standards" document, or justify accordingly.

For Design Standard 2 of the MRC BMP at Marcus Hook – Please explain why the 2-inch/24-hour storm was used for this design standard. Depending on the explanation, please correct the design storm to analyze the outflow to be "1.2-inch/2-hour" (instead of 2-inch/24-hour). Further, it seems from the HydroCAD model that the outflow is 0.00 cfs (instead of 0.01 cfs) for the 1.2"/2-hour storm. Please verify and revise the responses in the "MRC – 13 Design Standards" document, or justify accordingly.

For the MRC BMPs, verify that the basin bypass areas are accounted for in the design standards. Please amend the responses in the MRC – 13 Design Standards document to include this verification. The net change in volume from the DEP Worksheet 4 needs to be managed at each site. For the MRC BMPs, the 1.2 inch from all equivalent impervious area and the 2-year/24-hour storm back to the one-year/24-hour storm needs to include the basin bypass. Please verify.

The DEP Worksheet 12 numbers could not be verified without the updated DEP Worksheet 4s. Please provide updated copies of the DEP Worksheet 4 for Marcus Hook and Quakertown sites. Please note that the regulation for 20% of the existing impervious cover to be disturbed considered as meadow in good condition or better applies to Water Quality DEP Worksheet 12s as well as the runoff volume on DEP Worksheet 4. Please expand the PCSM BMP, revise the drainage area, or add additional Water Quality BMPs to account for the increase in NO3. In addition, the DEP Worksheet 12 numbers are not matching up with Section VII in the PCSM narrative.

2. DEP Comment (2/25/20): 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 all of the components of Title 25 Pa. Code § 102.8(n) for the restoration activities of the proposed earth disturbance activities for the areas to be restored as part of this ESCGP-3 permit application. Please note that the Site Restoration Schedule, that is located in the E&S

Plan drawing set (General Notes Sheet 6 of 7), should also be located in the PCSM Plan drawing set since it is a PCSM BMP with Long-Term Operation and Maintenance requirements. (25 Pa. Code § 102.8(n)]

2. JMT Response (3/24/20): To best demonstrate how the applicant is to meet Title 25 Pa. Code § 102.8(n) to describe the project scope. There are 13 sites included with this permit application, 3-meter stations and 10 valve sites. This is comprised of 3 new valve sites and replacement of 7 existing valve sites.

The meter stations (Marcus Hook, Transco, and Quakertown) proposes new buildings and paved areas. These sites provide stormwater management practice on each site to manage the increased volume runoff due to the revised land cover. These sites have been designed in accordance with DEP requirements for water quality, volume control, and rate control. The PCSM narrative has the complete analysis, infiltration testing results, and hydrologic modeling data for review. In addition, the PCSM design plans provide design details for the construction of the proposed BMP's on each site. Both the plans and narrative identify the long-term operation and maintenance requirements associated with these facilities. Finally, the applicant is abundantly aware of their long-term responsibilities as the selection of the BMP was discussed in great detail to ensure that the long term commitment was acceptable to the applicant.

The valve sites have no change in land cover from existing conditions and the applicant is to restore the disturbed areas to match the existing land cover and drainage patterns. The scope of work for each site is to access the valve site, replace the valve and segments of pipeline, backfill the excavated areas, place fencing, regrade the disturbed areas to maintain the existing drainage patterns, and restore the land cover (gravel or vegetation). The land cover on these existing valve sites is gravel with is to be replaced (in kind) and new sites will be restored to vegetated conditions. These sites have no increase in impervious land cover and it is not anticipated to negatively impact the watersheds drainage area. This is further defined on the PCSM and E&S plan notes in the "Site Restoration Schedule", PCSM 3 and E&S 6.

The design has given consideration on how to (1) preserve the integrity of stream channels and maintain and protect the physical, biological and chemical qualities of the receiving stream, (2) prevent an increase in the rate of stormwater runoff, (3) minimize any increase in stormwater runoff volume, (4) minimize impervious areas, (5) maximize the protection of existing drainage features and existing vegetation, (6) minimize land clearing and grading (7) minimize soil compaction, and (8) utilize other structural or nonstructural BMPs that prevent or minimize changes in stormwater runoff. The E&S and PCSM narratives and plans provide for ABACT control measures in special watersheds, structural stormwater management facilities on site with increased impervious land cover, maintaining tight workspaces to limit disturbance, and limiting impervious cover where feasible. Additional language has been added to the PCSM Narrative, Section V, to describe how the site restoration activities will satisfy the requirement set forth in Chapter 102.

2. DEP Comment April 24, 2020: This comment was partially addressed by the applicant/consultant.

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).

8. DEP Comment (2/25/20): Regarding the Existing Conditions section of the completed DEP Worksheet 4 for this application, there are comments related to the regulation at Title 25 Pa. Code Chapter 102.8(g)(2)(i) and (ii). Please address the following in the PCSM Report [ESCGP-3 permit application worksheet and 25 Pa. Code § 102.8(g)(2)]:

- a. For the Transco Meter Station site, please provide an explanation for the use of "woods" and "brush" cover and the associated CN values listed in the Existing Conditions section.
- b. For the Marcus Hook Compressor Station site, please provide an explanation for the use of "gravel" and "impervious" cover and the associated CN values listed in the Existing Conditions section.
- c. For the Quakertown Compressor Station site, please provide an explanation for the use of "impervious," "gravel," and "brush" cover and the associated CA values listed in the Existing Conditions section.

8. JMT Response (3/24/20): Per Chapter 102.8(g)(2), the Existing Conditions 2-yr, 24-hr runoff volume was revised to ensure runoff calculations within Worksheet 4 are using 20% of impervious and gravel as meadow and all non-forested areas, which includes brush areas, were also considered meadow in existing conditions. This is noted in PCSM Report, Section VII, and calculations are in App D.1. Please note the Existing Conditions and Demolition Plans for the Transco, Marcus Hook and Quakertown sites notes the existing land covers. Furthermore, the drainage area maps detail the land covers as well.

8. DEP Comment April 24, 2020: This comment was partially addressed by the applicant/consultant. Please provide updated copies of the DEP Worksheet 4 for the Transco and Marcus Hook sites. Please clarify the existing pervious, non-forested areas considered as meadow in good condition or its equivalent, and 20% of the existing impervious areas to be disturbed considered as meadow in good condition or better on DEP Worksheet 4 for each of the three sites (Marcus Hook, Transco, and Quakertown sites).

9. DEP Comment (2/25/20): At the Transco Meter Station site, it is recommended to apply an appropriate factor of safety to the field measured infiltration rates to determine a recommended design infiltration rate, following Appendix C of the PA BMP Manual. Please revise the PCSM computations accordingly to include an appropriate factor of safety, or please provide adequate justification. [PA BMP Manual Appendix C]

9. JMT Response (3/24/20): Using a factor of safety of 2, an infiltration testing rate of 0.13 in/hr was used in the design calculations. HydroCAD computations within Appendix D.2 reflect this revision.

9. DEP Comment April 24, 2020: This comment was partially addressed by the applicant/consultant. With the addition of the factor of safety of 2 and using 0.13 inch/hour for the design infiltration rate, please demonstrate by referencing specific calculations and numbers in the HydroCAD Model (Appendix D.2), the ESCGP-3 NOI/Application Section H.e Summary Table for Transco Meter Station Site (PDF page 32 of 58), and DEP Worksheet 4 that the PCSM/SR Plan meets the standard design criteria from sections 102.8(g)(2) and (3) and the Stormwater BMP Manual. In addition, for the Transco Meter Station Site, the HydroCAD Model (Appendix D.2), the ESCGP-3 NOI/Application Section H.e Summary Table, and DEP Worksheets 4 and 5 should be verified to make sure each of these documents are consistent with each other.

Please amend the PCSM narrative to better address the Basin Bypass drainage areas for the Transco site and how the Basin bypass area is managed for net increase runoff volume, water quality, and peak rate.

The DEP Water Quality Worksheet 12 numbers could not be verified without the updated DEP Worksheet 4 for the Transco site. Please note that the regulation for 20% of the existing impervious areas to be disturbed considered as meadow in good condition or better applies to the DEP Water Quality Worksheet 12s as well as the runoff volume on DEP Worksheet 4. Please expand the PCSM BMP, revise the drainage area, or add additional Water Quality BMPs to account for the increase in Nitrate as noted in the PCSM narrative. Please note that the DEP Worksheet 12 numbers are not matching up with Section VII in the PCSM narrative.

Please provide the calculations for the drawdown time for the infiltration basin using the design infiltration rate, verifying that the basin completely drains between 24 and 72 hours after the end of the design storm (per the recommendations of Chapter 3 of the PCSM Manual). The volume used for this calculation should correspond to the runoff volume increase calculated in DEP Worksheet 4.

13. DEP Comment (2/25/20): For the Off-site Discharge Analyses provided for this ESCGP-3 permit application, please follow the Frequently Asked Questions (FAQ) - Chapter 102 Off-Site Discharges of Stormwater to Non-Surface Waters dated January 2, 2019. In the applicant's response, please document the changes that were made to address the items listed in the FAQ document. The FAQ document can be found on DEP's website at: <https://www.dep.pa.gov/Business/Water/CleanWater/StormwaterMgmt/Stormwater%20Construction/Pages/E-S%20Resources.aspx> [ESCGP-3 permit application and 102.4(c)]

13. JMT Response (3/24/20): The PCSM and E&S Narratives were updated to include an off-site discharge analysis for the existing swales at Marcus Hook and Transco, see PCSM Appendix D.3. The analysis within the narrative notes the resulting reduction in rate and volume. The following revisions were completed as part of this submission in response to the FAQ guidance: • Per FAQ #3, the appendix includes a separate exhibit detailing the soil types, flow path, and adjacent property owners. The exhibits illustrate that the flow path meet an unnamed tributary of Naaman’s Creek (per eMaps). • Per FAQ #5, JMT has provided additional calculations to demonstrate stable flow at the existing swales. • Per FAQ #6, the flow does enter a MS4 sewer system prior to reaching a surface water however there is no increase in rate or volume and does not require consent from the MS4 permittee.

13. DEP Comment April 24, 2020: This comment was partially addressed by the applicant/consultant. In addition to DCCD’s remaining comments as listed above, DEP has the following comments:

From FAQ #3: “On the Erosion and Sediment Control (E&S) and the PCSM Plan drawings, identify all properties and property owners that will or may receive stormwater discharges from the project site until discharges reach surface waters. Identify the flow path from discharge point to the confluence with a surface water.” Please identify these items on the E&S and the PCSM Plan drawings. Please note that the flow path is somewhat difficult to identify from the contour lines for these sites; therefore, photographs are recommended to supplement the identification of the flow path from the point source (i.e., BMP outlet, channel, storm sewer, etc.) until the confluence with the receiving surface water for these sites. In addition, identify the soil types, erodibility factors and vegetative cover of the flow path on the E&S and the PCSM Plan drawings.

From FAQ #3: In the written narrative portion of the E&S and PCSM Plans, provide an analysis that demonstrates that the proposed volume and peak rate of stormwater discharging to the flow path will avoid, minimize, or mitigate accelerated erosion or sedimentation for storm events up to and including the 10-year/24-hour storm. The calculations should be consistent with the Erosion and Sediment Pollution Control Program Manual and the Pennsylvania Stormwater Best Management Practices Manual.” Please provide a narrative that discusses the calculations and the results of the calculations. Please include separate segments of the flow path with different cross-sectional area, longitudinal slope, soil types, erodibility factors, vegetative cover, etc.

From FAQ #5: “If the PCSM Plan reduces the post-construction stormwater runoff rate to the preconstruction rate, is that a sufficient demonstration for preventing accelerated erosion?”

A demonstration of meeting pre-construction runoff rates would not be sufficient where postconstruction runoff is concentrated in comparison to pre-construction conditions.

EXAMPLE 5.A – The pre-development flow rate is 10 cfs, spread across an area that is 100-ft. wide in a shallow concentrated flow condition. The post-construction flow rate from the PCSM BMP's outlet is 8 cfs (for a reduction to the flow rate). However, the post-construction flow width will be narrowed down to an area that is only 15-ft. wide, producing a more concentrated flow condition. The off-site discharge analysis should evaluate the 15-ft. wide flow area to ensure that it is a stable flow path.”

Following FAQ #5, at Transco and Quakertown sites, it seems that there are sheet flow conditions from the area of the project site in the existing conditions that flow into adjacent wetlands. Please note that the word “wetlands” is included in the definition of “surface waters” at 102.1. The proposed conditions reflect a concentrated discharge from the PCSM BMP. This proposed concentrated discharge may need to be spread out to discharge to the same wetlands to mimic existing conditions. This needs to be addressed by the applicant.

From FAQ #6: If stormwater discharges will enter a municipal separate storm sewer system (MS4) or a combined sewer system with combined sewer overflows (CSOs), and there will be an increase in runoff volume or peak rate, the applicant must provide written consent from the MS4 or CSO permittee before a permit under Chapter 102 can be issued or general permit coverage authorized. This is applicable until the runoff reaches the receiving surface water.” Please address any MS4s and/or CSOs for the entire flow path from the point source (i.e., BMP outlet, channel, storm sewer, etc.) until the confluence with the receiving surface water for these sites.

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, or DEP may deny the ESCGP-3 permit application.

Please submit 1 hard copy and 1 CD-ROM of the application documents that address the above comments to each of the County Conservation Districts (Bucks County Conservation District, 1456 Ferry Rd # 704, Doylestown, PA 18901; Chester County Conservation District, 688 Unionville Rd # 200, Kennett Square, PA 19348; Delaware County Conservation District, 1521 N Providence Rd, Media, PA 19063; Montgomery County Conservation District, 143 Level Rd, Colledgeville, PA 19426), and 1 hard copy, 1 CD-ROM, and 1 electronic submission via DEP's FTP Site of the application documents that address the above comments to DEP at 2 East Main Street, Norristown, PA 19401.

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)
Bucks County Conservation District
Chester County Conservation District
Delaware County Conservation District
Montgomery County Conservation District
Mr. Hohenstein
Ms. Cain
Mr. Shankar
Mr. Patterson
Mr. Rocco
Re 30