



August 16, 2019

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

Re: Technical Deficiency – 401 State Water Quality Certification (SWQC)
Adelphia Gateway Project
DEP File No. EA0001219-001
Various Municipalities
Bucks, Chester, Delaware, Montgomery, and Northampton Counties

Dear Mr. Valori:

The Department of Environmental Protection (DEP) has reviewed the above-referenced Request for 401 State Water Quality Certification (SWQC) and has identified the following technical deficiencies. The deficiencies are based on applicable laws and regulations, and the guidance sets forth DEP's preferred means of satisfying the applicable regulatory requirements.

Technical Deficiencies

1. Provide detailed information, including impact data for waters and wetlands crossings of the Tilghman and Parkway Loops. This information is required to complete the 401 SWQC review. The 401 SWQC, when authorized, provides coverage for the entire project. Note that remote sensing data is acceptable for the 401 SWQC but that actual field measured data is required for permitting. General Permits have been submitted for project impacts in Bucks, Chester, and Montgomery Counties. Please be advised that based on the information provided, the Tilghman Loop portion of the project appears to require an Individual Water Obstruction and Encroachment Permit Application.
2. There are discrepancies in the previously submitted impact figures between different documents such as the FERC Environmental Assessment (EA), the 105 general permit registration documents and the request for the 401 SWQC. To address these discrepancies, please prepare an updated table listing all temporary and permanent impacts for each wetland, stream, floodway, and floodplain impact. For each impact, please identify the acreage, linear feet, permit application number, and location. Also indicate how the data was collected.

For example:

- GP-8 Quakertown C.S. - Wetland impact - Stream Impact - Floodway Impact – Method
 - GP-8 Perkiomen - Wetland Impact - Stream Impact - Floodway Impact – Method
 - GP-11 East Branch Perkiomen - Wetland Impact - Stream Impact - Floodway Impact – Method
 - GP-8 Paoli Pike - Wetland Impact - Stream Impact - Floodway Impact – Method
 - GP-11 Paoli Pike - Wetland Impact - Stream Impact - Floodway Impact – Method
 - Tilghman Loop - Wetland Impact - Stream Impact - Floodway Impact – Method
 - Parkway - Wetland Impact - Stream Impact - Floodway Impact – Method
3. The FERC EA contains a project level Alternatives Analysis (AA). Comments 4–7 that follow, requests additional discussion on the avoidance, minimization, and mitigation of impacts.
 4. The FERC EA states that no wetlands will be impacted by the Tilghman Loop. However, the Request for 401 SWQC indicates a wetland crossing by Horizontal Directional Drilling (HDD) – which is still considered an impact and requires permit authorization. Please explain and verify this item. In your response, please include whether an HDD Assessment was performed and provide an AA discussion for this crossing.
 5. The FERC EA states that Marcus Hook Creek will be crossed by using HDD and that Stoney Creek will be crossed by open-trenching. Please explain and verify this item. In your response, please include whether an HDD Assessment was performed and provide an AA discussion describing why a trenchless method such as direct bore or HDD is not being proposed for the Stoney Creek crossing.
 6. The FERC EA indicates permanent impacts to the Paoli Pike BAV and the Perkiomen BAV wetlands due to proposed gravel placement. Please explain why a less impacting alternative such as removable mats cannot be utilized at these sites and why all permanent impacts cannot be eliminated.

7. The FERC EA indicates that a diversion trench will be proposed to discharge stormwater from the Transco Meter Station area to a wetland. Please provide plans showing location, and functions and values assessment of this wetland and your plans to prevent wetland impacts (such as channelization, erosion, and/or draining) due to the proposed diversion channel. Please provide an AA which includes an assessment of alternatives to discharging to the wetland.
8. Provide a copy of the clearance letter from the U.S. Fish and Wildlife Service (USFWS) for GP-8 Quakertown Compressor Station.
9. This project proposes the discharge of hydrostatic testing water. Please address the intake source(s) and discharge location(s) and volumes of hydrostatic test water. The FERC EA states that hydrostatic test water may be discharged to a storm sewer. If this is the case, a PAG-10 permit for any discharge to waters of the Commonwealth (including storm sewers) must be obtained from PADEP's Clean Water program who may be contacted at 484.250.5970. If the project proposes to discharge to treatment plant, please provide written documentation of their acceptance of this discharge.
10. The FERC EA lists seven contaminated sites that will be crossed or that are in close proximity to the proposed pipeline. To the best of our knowledge, this includes one Superfund Site, two RCRA Corrective Action sites, and several PADEP Act 2 sites. Provide documentation that the various federal, state, and local agencies regulating these sites have approved work associated with the pipeline. Include in the response to this comment plans to contain, handle and dispose of any contaminated soil, groundwater, run-off water, including dewatering pumped water from trenching, drilling fluids, and IRs.
11. Describe your plans to protect public and private water sources - including intakes and wells - that are located adjacent to the proposed project. Include notification plans that will be implemented should spills, IRs, or other releases that have the potential to impact these water sources.

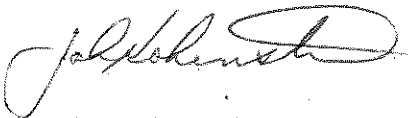
You may request a time extension, in writing, before October 8, 2019, to respond to deficiencies beyond the sixty (60) calendar days. Requests for time extensions will be reviewed by DEP and considered. You will be notified in writing of the decision either to grant or deny, including a specific due date to respond if the extension is granted. Time extensions shall be in accordance with 25 Pa. Code § 105.13a(b).

Pursuant to 25 Pa. Code § 105.13a of DEP's Chapter 105 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 8, 2019, or DEP may consider the application to be withdrawn by the applicant.

If you believe that any of the stated deficiencies is not significant, instead of submitting a response to that deficiency, you have the option of asking DEP to make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. 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 may be withdrawn or denied.

Should you have any questions regarding the identified deficiencies, please contact Mr. Donald Knorr at the telephone number located in the first page footer and refer to EA0001219-001 to discuss your concerns or to schedule a meeting. The meeting must be scheduled within the 60-day period allotted for your reply, unless otherwise extended by DEP.

Sincerely,



John Hohenstein, P.E.
Regional Manager
Waterways and Wetlands

cc: Ms. Holmes - NV5
Re 30 (GJS19WAW)228-1

Mr. Mark Valori

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August 16, 2019

bcc: Mr. Shankar, P.E.
Mr. Rocco, P.E.
Mr. Hohenstein, P.E.
Mr. C. Smith, P.E.
Mr. Knorr
Re 30 (GJS19WAW)228-1