



August 28, 2020

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

Re: Technical Deficiency Letter
Adelphia Gateway Project - Phase 2B
ESCGP-3 Permit Application No. ESG 01 00 19 001
Municipality: Lower Chichester Township, Trainer Borough, and City of Chester
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. The specification for straw mulch stabilization could not be located, or wood cellulose mulch specifications for areas stabilized with hydro-seeding. Chapter 102.11 (a) (1)
2. Sheet SR-23 – disturbed areas on both sides of Stoney Creek yet no erosion control shown on erosion control matting. Chapter 102.11 (a) (1)
3. Sheet SR-34 – maybe close to the Wade Dump Capped Super Fund site. Have the limits of contamination been identified in this area? Chapter 102.11 (a) (1)
4. 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)
5. At a minimum, the E & S plan should address the separate documents for

directional drilling and inadvertent release contingency plans. Chapter 102.11 (a) (1). Note: They were not included with this submission.

6. Sequence of Construction should address removal of erosion and sediment control devices once the site is stabilized. Chapter 102.11 (a) (1)
7. The titles of the plan drawings SR-8 through SR-35 should be amended to include "Site Restoration Plan." Chapter 102.8 (f)
8. For the PECO Meter Station, it is understood that there are two (2) new buildings to be constructed and five (5) new concrete pads. To manage the increase in runoff volume, water quality, and peak rate for these new impervious surfaces, the applicant is proposing two (2) green roofs and three (3) rain barrels at this site. In the PCSM Report, it is noted that the rain barrels will function as a Capture and Reuse BMP. It is further noted that the rainwater collected in these rain barrels (collected and conveyed from the green roofs) will be reused for dust control measures throughout the site. Typically, in order to take credit for a Capture and Reuse BMP, the applicant's team needs to demonstrate the demand or water need for the collected rainwater on an annual basis. Please provide a demonstration for this water need or demand in dust control measure throughout the site. Typically, as referenced in the PA BMP Manual, the demonstration includes a schedule and a water budget for reusing the collected rainwater based on the forecasted need, demand, and/or usage. This schedule for this demand in dust control measures should be added to the Long-term Operation and Maintenance Plan for the PCSM Plan for this site. Further, regarding the five concrete pads, it seems that the applicant's team has decided that these concrete pads will not cause a rainwater runoff discharge point from the site. Please provide reasoning for this decision. In addition, please consider an adequate conveyance path for the bypass or overflow of larger storm events of the rain barrels as referenced in the PA BMP Manual. Chapter 102.8(f)

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 September 28, 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 (Phase 2B) 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
Municipal Engineer – Trainer Borough
Municipal Engineer – City of Chester
Mr. Smith
Mr. Hohenstein
Mr. Shankar
Mr. Rocco
Ms. Yordy
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