

October 28, 2020

Texas Eastern Transmission, LP
c/o Mr. William Brett, Supervisor - Environmental Construction Permitting
890 Winter Street, Suite 300
Waltham, MA 02451

Re: Technical Deficiency Letter
Erosion and Sediment Control (E&S) Permit
Conemaugh River Crossing Project
DEP Application No. ESG836520001-00
APS No. 1017977; AUTH ID No. 1317290
Derry Township, Westmoreland County
Blacklick Township, Indiana County

Dear Mr. Brett:

The Department of Environmental Protection (DEP) has reviewed the above-referenced application/NOI and has identified the following 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

Notice of Intent - §102.6(a)(1)

1. In Section B Client Information, please list the full zip code. The current entry only has four digits.
2. Section E Project Information lists 12.23 acres for the total project area and the total disturbed area. The Stormwater Management (SWM) Report Project Description cites approximately 20 acres of total disturbed area. Please clarify and revise.
3. Section E Project Description does not mention the grouting/abandonment of the old line. Please include this component of the project.
4. Please update Section H Act 167 Consistency. Either Consistency Letter or Verification Report Included should be checked. Additionally, the appropriate box (1, 2 or 3) should be checked in the below section. The Act 167 consistency letter was provided as a response to the Incompleteness Letter; however, the NOI should be updated.

5. Section H PCSM/SR Alternative Standards is checked yes as being approved by the Department. However, it is not checked in the above section that Alternative Design Standards are being utilized. Please clarify and revise as necessary.
6. It appears there was an entry error for Section H.e, in the Summary Table for Stormwater Data. The volume design storm has an entry of 2.7 and the rainfall amount was not entered. Additionally, the listed Impervious Area of 0.2-acres does not match the plans and the SWM Report, which list approximately 0.5 acres of impervious acres added. Please revise.
7. In Section H.f Summary Description of PCSM/SR BMPs, the entry for Infiltration Trench should have two volumes entered since VC, RC, and WQ are all checked. RC requires volume for the 100-year/24-hour storm event and VC/WQ requires volume for the 2-year/24-hour storm event.
8. Section H.g Critical PCSM Plan stages – this section intends to identify the critical stages for which a licensed professional shall be present on site. The current verbiage states the licensed professional will “review the area of the proposed PCSM BMP.” Please clarify when the licensed professional is to be present.
9. Section M Additional Contact Information was not filled out. It is requested that the consultant information be included here.
10. The Summary of Bio-Infiltration BMPs at the end of the NOI was not filled out. The information for the infiltration trench should be included here.

E&S Plan - §102.4(b)(5)(ix)

11. On sheets DELM-P-8200 & 8202 the compost filter sock and the silt fence are indicated directly on the LOD preventing proper space for installing and maintaining the E&S control.
12. Compost filter sock and silt fence should be on contour. If workspace prevents keeping the E&S controls on contour they should be shown as the J-hook configuration.
13. Please indicate on the drawings that erosion control blanket will be utilized on earth disturbance within 50 feet of the wetlands and on slopes 3:1 or steeper during final stabilization.
14. Per Figure 3.7 of the PA E&SPC Manual, a geotextile underlayment shall be used on a wood mat for wetland crossings. Detail ES-0008 does not indicate this will be done. Please revise.
15. Please clarify if waterbars and trench plugs are to be installed. They are shown in the legend and details but no locations for these BMPs are shown on the plans.
16. Please clarify if any BMPs, such as a concrete washout, will be needed for the abandonment and grouting process.

PCSM Module(s) – Stormwater Management (SWM) Report

17. On page 5 of the SWM, the delineated drainage area for the Design Point of Interest includes a portion of the access road and an undisturbed area. In the PCSM Report Section 7.0 BMP Description Narrative, it mentions the access road and mainline valve (MLV) will be graded to direct stormwater to the BMP. This should then be included in the drainage area. The stormwater calculations should use the curve number to account for all cover types changing post-construction, including the MLV. Please revise.
18. The SWM Report Design Data and Methodologies mention the DEP PCSM Spreadsheet was utilized. Please include all the DEP PCSM Spreadsheets that were used.
19. The SWM storage curve input indicates a pipe diameter of 36” is to be used for the infiltration trench. Drawing PCSM- 8 indicates an 8” pipe. Please clarify and revise as necessary.
20. Worksheet 10 is included in two locations. It is included in Appendix A - Calculations of the PCSM Report and in Appendix F of the SWM Report. Please only include in the SWM Report.
21. Information should be provided for the non-structural BMPs checked on Worksheet 10 explaining how the key design elements were implemented for BMP effectiveness. Additionally, the extents of the BMPs should be delineated and notations made on the plans as appropriate. Please clarify if the non-structural BMP Re-Vegetate/Re-Forest is to protect existing trees or plant new native vegetation. Chapter 8.8 of the PA BMP Stormwater Manual Chapter 8 provides criteria for these BMPs.

PCSM Report

22. Please clarify in the Project Description that the replacement involves abandoning the old line via grouting and installing a new pipeline.
23. In the PCSM Narrative, BMP Installation Sequence, item #13 references PA E&SPC Manual March 2000, or latest edition. March 2012 is the latest edition. Please revise.
24. The narrative does not provide a description of the past (at least 50 years), present, and proposed land uses. Some land use is referenced, but a complete description is missing. Please provide.
25. Appendix E of the Spill Prevention Control and Countermeasure (SPCC) Plan includes a Pipeyard: Facility Storage Drawing. Please clarify if an additional Pipeyard is part of this project, the location of the pipe yard and if there will be any earth disturbance at the pipe yard.

PCSM Plan

26. Drawing PCSM-8 (a detail of the PCSM BMP, which is an infiltration trench) labels one item "permeable soil" but there is no spec or description for "permeable soil" included with the plan.
27. Parcel lines are included in the legend but do not appear to be on the plan drawings. Please confirm that no parcel lines exist within the plans.
28. Please evaluate the following items of the construction sequence and details of the infiltration trench for consistency:
 - a. On Drawing PCSM-2, item No. 10 in the sequence indicates to seed and stabilize, however, item No. 13 then indicates to rough grade the swale. Item No. 17 also indicates to seed. Please clarify and revise as necessary.
 - b. On Drawing PCSM-2, item No. 9 in the construction sequence indicates a 6-inch lift of approved topsoil over the infiltration trench. However, the Cross-Section detail on Drawing PCSM No. 8 shows 2-8 feet (min. 30") of permeable soil above the trench. The Infiltration Trench Profile shows 4-6 feet of permeable soil. Please clarify and ensure consistency throughout the plans.
29. On Drawing PCSM-2, the E&S Control BMP Removal says to contact Westmorland CCD before the removal of the E&SPC BMPs. Indiana CCD should additionally be listed and contacted.
30. Please clarify if/where slope breakers and trench breakers are to be installed. They are shown in the legend and the details but no locations for these BMPs are shown on the plans.
31. Please clarify the intent of the existing valve site near Newport Road. Since a new mainline valve site is being installed, will this area continue to be maintained as a valve site?

Additional Technical Deficiencies (HDD)

32. A Response to Inadvertent Returns for a release into the Conemaugh River needs to be included with the submission and defined on the E&S Plans. (Chapter 102.11(a)(4))
33. A Response to Inadvertent Returns for the potential to impact other pipelines in the right-of-way needs to be included with the submission and defined on the E&S Plans. (Chapter 102.11(a)(4))
34. The depth to groundwater in the areas of the entry and exit pits for the HDD should be determined. (Chapter 102.4(b)(4)(xii))
35. Private and public water supplies within 400 feet of the HDD should be identified and documented. (Chapter 102.4(b)(4)(xii))

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 **December 27, 2020** or DEP may consider the application to be withdrawn by the applicant.

You may request a time extension in writing before **December 27, 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 1 paper copy of the revised E&S plans and 1 copy of the revised PCSM plans to the District at their provided mail address and an electronic copy of the revised information to the DEP.

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. ESG836520001-00, 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>. (for individual permits only).

Sincerely,



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

cc: AECOM (by email)
Westmoreland County Conservation District (by email)
Indiana County Conservation District (by email)
Blacklick Township (by email)
Derry Township (by email)