Pennsylvania
Department of
Environmental Protection

August 8, 2025

Transcontinental Gas Pipe Line Company, LLC
c/o Joseph Dean, Permitting Manager
2800 Post Oak Blvd, Level 11
Houston, TX 77056

Re: Technical Deficiency Letter
Northeast Supply Enhancement Project – Quarry Loop and Compressor Station
E&S Permit Application No. ESP830025001-00
APS No. 1139477; AUTH ID No. 1530808
East Drumore Township, Drumore Township & Eden Township, Lancaster County
East Whiteland Township, Chester County

Dear Mr. Dean:

The Department of Environmental Protection (DEP) has reviewed the above referenced application and has 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.

The technical deficiencies void the permit decision guarantee and any agreements that have been made regarding the timeline for the permit application review. DEP will continue to follow the permit review process procedures in the review and processing of this permit application.

Technical Deficiencies

E&S Plan

The following comments are from the Lancaster County Conservation District:

1. Page 283 of the PA Erosion Control Program Manual indicates the length of time required for open trench operations should be specified on the E&S plans, and this time period should be the minimum necessary to efficiently excavate the trench, install the pipe, backfill the trench, and begin stabilization of disturbed areas. Include this length of time on the E&S plans. *[25 Pa Code § 102.4(b)(4)(i), 102.11(a)(1)]*

2. The Site Restoration plans include station numbers. Include these station numbers on the E&S plan drawings. *[25 Pa Code § 102.4(b)(5)(ix)]*

3. Sheet 1 of the E&S plan drawings indicates the following under "Sequence of Construction – Pipeline": "The contractor will be required to provide a sequence of construction (with timelines and by milepost in terms of which areas of the project will be constructed in which order prior to the start of any earth disturbance." Provide this sequence of construction on the E&S plans as part of this application or justify how the current sequence of construction provided on the plan drawings is adequate. *[25 Pa Code § 102.4(b)(5)(vii)]*

4. Step 12 of the construction sequence references the installation of diversion terraces, diversion berms, bypass flumes, outlet protection, and compost filter sock after steps 10 and 11 (topsoil stripping and rough grading). Include provisions in the sequence for the installation of BMPs prior to earth disturbance activities or justify how the current construction sequence is appropriate. *[25 Pa Code § 102.4(b)(5)(vii)]*

5. Reference the construction of Channel 1 within the construction sequence. *[25 Pa Code § 102.4(b)(5)(vii)]*

6. Provide a construction sequence for the installation of the three valve sites. *[25 Pa Code § 102.4(b)(5)(vii)]*

7. Identify boundaries between soil use types on the E&S plan drawings or separate exhibit. *[25 Pa Code § 102.4(b)(5)(ii)]*

8. Within question 3 on page 1 of E&S Module 1, describe the past, present, and proposed land uses of the project site. *[25 Pa Code § 102.4(b)(5)(iii)]*

9. Within page 6 of E&S Module 1, the E&S plan developer has identified being a certified E&S Professional. In the spaces provided, include a certification type and certification number. Alternatively, to document E&S-related experience, the plan preparer may provide a completed Standard E&S Worksheet #22 from the PA Erosion Control Program Manual. *[25 Pa Code § 102.4(b)(3)]*

10. The plan drawings show "SB" proposed through the ROW, which the construction detail indicates corresponds to silt fence. However, the legend indicates that the sediment barrier is filter sock, and Standard Worksheet #1 indicates compost sock is proposed. Clarify the specific type of sediment barriers proposed on the E&S plan drawings. Note that ABACT-rated requirements may apply. *[25 Pa Code § 102.4(b)(5)(ix)]*

11. Many sediment barriers shown on the E&S plan drawings cross existing contours. Review all compost filter socks and revise each as needed to ensure the placement of the compost filter socks is parallel to existing contours. *[25 Pa Code § 102.4(b)(5)(ix)]*

12. A construction detail has been provided in the lower left of E&S plan sheet 28 with no description. Provide additional information on the E&S plans for what this detail is intended to represent. *[25 Pa Code § 102.4(b)(5)(ix)]*

13. Sheet 28 of the E&S plan drawings indicates a diversion terrace will outlet to a compost filter sock (detail OS3). Compost filter socks are not recommended to receive concentrated flow prior to changing to sheet flow. Revise the design of the diversion terrace outlet structures or justify how the compost socks will be sufficient to outlet runoff from the terraces. *[25 Pa Code § 102.4(b)(5)(ix)]*

14. The OS3 compost filter sock outlet structure detail indicates a maximum of 2-percent slope along the diversion terrace. Worksheet #11 for several of the diversion terraces indicates slopes greater than 2-percent. If this construction detail will be utilized, clarify whether any diversion terraces that outlet to a compost sock will have a slope greater than 2-percent, and if so, revise the construction detail. *[25 Pa Code § 102.4(b)(5)(ix)]*

15. For each diversion terrace on the E&S plan drawings, provide labeling indicating the BMP/construction detail that will serve as the terrace outlet. *[25 Pa Code § 102.4(b)(5)(ix)]*

16. Within the construction details for the diversion terrace and diversion berm or the construction sequence, provide instructions for the temporary and permanent stabilization of the berms after each berm is constructed. *[25 Pa Code § 102.4(b)(5)(ix)]*

17. Label each diversion terrace on the E&S plan drawings with its identifier as listed in Worksheet #11 and the bypass flume drainage area maps. *[25 Pa Code § 102.4(b)(5)(ix)]*

18. A portion of a diversion berm on sheet 14 to the west of Wetland W-T02-005A-1 is outside the limits of disturbance. Revise the E&S plan drawings to fully place this diversion berm within the limits of disturbance. *[25 Pa Code § 102.4(b)(5)(ix)]*

19. The alternative rock construction entrance (RCE) does not meet ABACT standards. The approved alternative ABACT 100-foot RCE has the first 50 feet, including entrance flare, of rolled and compacted 2RC over 4-inches of AASHTO #1 aggregate. The second 50 feet consists of standard 8-inches AASHTO #1 aggregate. Review and revise to meet ABACT standards. Refer to the Example Alternative Rock Construction Entrance detail on DEP's Alternative E&S and PCSM BMPs document, accessible from PADEP's E&S Resources webpage. Ensure that all bold-faced notes under Standard Construction Detail #3-1 (Page 14 of the E&S Manual) are included with the construction detail. *[25 Pa Code §102.4(b)(5)(ix), 102.11(a)(1)]*

20. The construction details for the "sediment barrier" and "super sediment barrier" on sheet 30 of the E&S plans do not match the construction details for the silt fence and super silt fence in the PA Erosion Control Program Manual. In particular, some of the notes have not been included on the details. Ensure these details on the plans are consistent with the details in the Manual. *[25 Pa Code §102.4(b)(5)(ix), 102.11(a)(1)]*

21. It does not appear all compost filter socks shown on the E&S plan drawings or listed in the table on sheet 26 of the E&S plan drawings have been included in Worksheet #1. Ensure all compost socks shown on the E&S plan drawings have been included in Worksheet #1 and the table on sheet 26. *[25 Pa Code § 102.4(b)(5)(viii)]*

22. A note has been provided at the end of Standard E&S Worksheet #1 indicating why slope lengths for some compost socks have been exceeded; however, this note has been cutoff in a printing error. Ensure the entirety of the note is provided on Worksheet #1. *[25 Pa Code § 102.4(b)(5)(viii)]*

23. The drainage area to the sediment traps was not able to be located on the E&S plan drawings or supporting calculations. Provide a schematic which delineates and labels the drainage area of the sediment traps, consistent with the drainage area listed in Standard E&S Worksheet #19. *[25 Pa Code § 102.4(b)(5)(viii)]*

24. Provide supporting calculations to demonstrate whether a minimum of 700 cubic feet per acre of volume for the sediment storage zone is met for each compost sock sediment trap. *[25 Pa Code § 102.4(b)(5)(viii)]*

25. Provide a construction detail for erosion control blanketing from the PA Erosion Control Program Manual on the E&S plan drawings. *[25 Pa Code §102.4(b)(5)(ix), 102.11(a)(1)]*

26. Show the known or assumed FEMA floodway for each stream crossing on the E&S plan drawings. *[25 Pa Code §102.4(b)(5)(ix)]*

27. Provide a stapling pattern detail for the erosion control blanketing proposed in Channel 1 and the diversion berms. *[25 Pa Code § 102.4(b)(5)(ix)]*

28. Show proposed channel lining for Channel 1 on the E&S plan drawings. *[25 Pa Code § 102.4(b)(5)(ix)]*

29. For the permanent conditions of Channel 1, the value of Manning's coefficient listed in Standard E&S Worksheet #11 does not match the values listed in Table 6.3 of the PA Erosion Control Program Manual for the given flow depth and slope. Revise accordingly or justify why the currently provided Manning's coefficient values are sufficient. *[25 Pa Code § 102.4(b)(5)(viii)]*

30. Worksheet #11 for Channel 1 indicates the maximum allowable velocity for the permanent conditions of Channel 1 is 8 feet per second. This appears to be the maximum allowable velocity for the SC150 blanketing; however, this blanketing is not a permanent erosion control blanket and has a functional longevity of up to 24 months per the SC150 specification sheet. Revise Worksheet #11 to indicate the maximum allowable velocities for Channel 1 in the permanent conditions. Note that per page 132 of the PA Erosion Control Program Manual a maximum velocity of 3.0 to 4.0 ft/sec should be used under normal conditions if the vegetation is to be established by seeding. *[25 Pa Code § 102.4(b)(5)(viii), 102.11(a)(1)]*

31. Show the drainage area to Channel 1 on the E&S plan drawings or clarify where this information is located in the narrative. *[25 Pa Code § 102.4(b)(5)(viii)]*

32. For each proposed riprap apron, provide entries in E&S Worksheet #20 with supporting calculations for Q and V and provide completed Standard Construction Details 9-1 or 9-2 from the PA Erosion Control Program Manual on the E&S plans. *[25 Pa Code § 102.4(b)(5)(viii), 102.11(a)(1)]*

33. On Sheet 2 of the E&S plans, provide an energy dissipation BMP at the discharge point of the culvert outfall, or justify why an energy dissipation BMP is not necessary and minimal potential for accelerated erosion is present due to discharges from this culvert pipe. *[25 Pa Code § 102.4(b)(5)(viii), 102.4(b)(5)(ix)]*

34. Provide additional labeling of existing and proposed contours on the E&S plan drawings. LCCD will use this information to verify whether E&S BMPs are adequately placed downslope of earth disturbance. *[25 Pa Code § 102.4(b)(5)(i)]*

35. On sheet 2 of the E&S plan drawings, label the proposed contours associated with the proposed valve station. *[25 Pa Code § 102.4(b)(5)(ix)]*

36. Clarify the purpose of the temporary sandbag cofferdam shown on sheets 06 and 06B. *[25 Pa Code § 102.4(b)(5)(ix)]*

37. On sheets 06 and 06B of the E&S plan drawings, show the existing grading associated with the Atlantic Sunrise stormwater basins. *[25 Pa Code § 102.4(b)(5)(ix)]*

38. The E&S plan drawings provide a note indicating that water may be applied periodically to the worksite to control dust. In addition to this note, provide additional instructions on the E&S plan drawings for the control of dust from the project. Refer to Appendix H of the PA Erosion Control Program Manual for additional guidelines and BMPs for dust management. *[25 Pa Code § 102.4(b)(5)(ix), 102.11(a)(1)]*

39. For each proposed wetland crossing shown on the E&S plan drawings, provide labels indicating the specific details to reference for construction methods and BMPs proposed in the wetlands. *[25 Pa Code § 102.4(b)(5)(ix)]*

40. The labeling on E&S plan sheet 11A has been cutoff on the south side of the ROW. Revise the plans to fully show the labeling. *[25 Pa Code § 102.4(b)(5)(ix)]*

41. Sheet 19 of the E&S plan drawings shows a gray-colored line adjacent to the proposed pipeline not depicted in the legend. Clarify what this gray line is intended to represent. *[25 Pa Code § 102.4(b)(5)(ix)]*

42. On sheets 18 and 20 of the E&S plan drawings, show flared end sections associated with the construction entrances on Robert Fulton Highway and Kirkwood Pike. Ensure flared end sections are shown on each construction entrance throughout the limits of disturbance. *[25 Pa Code § 102.4(b)(5)(ix)]*

43. On the E&S plan drawings and/or site restoration plans, provide a seed mix specific to steep slopes, other otherwise clarify how permanent stabilization will be established on steep slopes. *[25 Pa Code § 102.4(b)(5)(ix)]*

44. On sheet 18 of the E&S plan drawings, a wetland is shown adjacent to the limits of disturbance. Show safety fence/wetland exclusion fence around the wetlands adjacent to the limits of disturbance. For wetlands adjacent to the limits of disturbance, LCCD recommends showing exclusionary fencing throughout the E&S plan drawings. *[25 Pa Code § 102.4(b)(5)(ix)]*

45. Clarify on the E&S plan drawings the location of the culvert shown in the culvert bedding detail on sheet 23 of the E&S plan drawings. *[25 Pa Code § 102.4(b)(5)(ix)]*

The following comments are from the Chester County Conservation District:

46. Please illustrate Erosion Control Blanketing for the swale/s and bio retention basin on the main plan mapping. *[25 Pa Code § 102.11(a)(1)]*

47. Stage 5 of the Sequence of Construction (SOC) removes topsoil prior to installation of E&S controls. All E&S controls should be installed prior to the beginning of earth disturbance activities. *[25 Pa Code § 102.11(a)(1)]*

48. The outlet of the biorention basin will be discharging over recently disturbed ground, please provide an immediate stable flow path for the discharge such as blanketing the final grading downslope of the outlet pipes. *[25 Pa Code § 102.11(a)(1)]*

49. The installation of the Channels should be addressed in the SOC. *[25 Pa Code § 102.11(a)(1)]*

50. The temporary stone staging area restoration should be covered by a Critical Stage Inspection/s, please update SOC accordingly. *[25 Pa Code § 102.11(a)(1)]*

51. There are existing PCSM BMPs on the site below the proposed disturbance for the expanded staging area, a Critical Stage inspection should include verifying those existing PCSM BMPs have not been impacted by the earth disturbance from this current project. *[25 Pa Code § 102.11(a)(1)]*

Application Form

52. Please provide final clearance from the Pennsylvania Fish and Boat Commission and include correspondences. *[25 Pa Code § 102.6(a)(2)]*

53. Please reference the location to the Project Description in the NOI. *[25 Pa Code § 102.6(a)(1)]*

54. Please be sure to include Valley Creek in the Stormwater Discharge Section of the NOI. *[25 Pa Code § 102.6(a)(1)]*

55. Please complete page 5 of Module 2. *[25 Pa Code § 102.6(a)(1)]*

PCSM Report

56. Please provide an EP Analysis for each discharge point location for the Quarryville Loop and the Compression Station 200. *[25 Pa Code § 102.8(f)(8)]*

PCSM Plan

57. Please provide a profile of the proposed 42-inch diameter natural gas pipeline on the Soil Erosion and Sediment Control Plans and the Post Construction stormwater Management Plans. *[25 Pa Code § 102.8(f)(9)]*

58. The notations and call outs for the MLV-195-5 Geoweb System are not legible (Drawing Number 26-0100-70-28-D). Please revise the text accordingly. *[25 Pa Code § 102.8(f)(9)]*

59. The Typical Section Low-Permeability Liner System Bioretention Basin Side Slopes shows the 4" underdrain and an underdrain end cap. The underdrain end cap references another detail. This underdrain end cap detail is not provided in the Plans. Please provide the underdrain end cap detail. *[25 Pa Code § 102.8(f)(9)]*

Additional Technical Deficiencies

60. Please provide a copy of the 2016 Geology and Geohazard Risk Evaluation that was referenced within the Karst Report. *[25 Pa Code § 102.8(f)(2)]*

You must submit a response fully addressing each of the technical deficiencies set forth above. Please note that this information must be received within 60 calendar days from the date of this letter, on or before **October 8, 2025** or DEP may deny the application. Alternatively, you may consider a voluntary withdrawal.

Your response must be submitted to the District and DEP using the same method of submission as was used for the original application. Submit electronically to DEP via Public Upload.

Resubmittal Info: Reference ID: 324330; PIN: 849141.

Please be advised that if your response does not satisfy the technical deficiencies, in general your NOI or application will proceed to an Elevated Review. If you do not believe the technical deficiencies can be fully addressed within the required timeframe, you should consider a voluntary withdrawal. If a permit application is denied, there is no recovery of fees available; however, if you voluntarily withdraw the NOI or application and then submit a new NOI or application for the same project, previously paid disturbed acreage fess will be reapplied to the new NOI or application.

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.

Conservation districts may charge additional fees in accordance with section 9(13) of the Conservation District Law (3 P.S. § 857(13)). You may be billed directly by the conservation district for additional plan reviews. (See 25 Pa. Code § 102.6(b)(3)).

If you have questions about your NOI, please contact Michael Luciani by e-mail at mluciani@pa.gov or by telephone at 570-826-2597 and refer to Application No. ESP830025001-00, to discuss your questions or to schedule a meeting. You must attempt to schedule any meeting within the 60 calendar days allotted for your reply.

Sincerely,

Rebecca Albert, PG
Environmental Group Manager
Regional Permit Coordination Office

cc: Peter Haas, AECOM Technical Services, LLC (by email)
Southcentral Regional Waterways and Wetlands PM (by email)

Southcentral Regional Waterways and Wetlands ARD (by email)
Lancaster County Conservation District (by email)
Chester County Conservation District (by email)
East Drumore Township (by email)
Drumore Township (by email)
Eden Township (by email)
East Whiteland Township (by email)