



Transcontinental Gas Pipe Line Company, LLC
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P.O. Box 1396
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713/215-2000

July 26, 2021

Rebecca Albert | P.G.
Environmental Group Manager
PADEP Regional Permit Coordination Office
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

**RE: REGIONAL ENERGY ACCESS EXPANSION PROJECT – LUZERNE, MONROE,
NORTHAMPTON, BUCKS, DELAWARE, CHESTER AND YORK COUNTIES;
INCOMPLETENESS REVIEW LETTER RESPONSE SUBMITTAL; EROSION & SEDIMENT
CONTROL PERMIT APPLICATION; PADEP APPLICATION NO. ESG830021002-00**

Dear Ms. Albert;

On April 9, 2021, Transcontinental Gas Pipe Line Company, LLC (Transco), a subsidiary of The Williams Companies, Inc., submitted a Chapter 102 Erosion and Sediment Control Permit Application (ESCGP-3) to the Pennsylvania Department of Environmental Protection (PADEP) for earth disturbance associated with the proposed Regional Energy Access Expansion Project (Project) located in Luzerne, Monroe, Northampton, Chester, Bucks, York and Delaware Counties. The PADEP issued an incompleteness review letter on June 2, 2021. The package herein responds to PADEP's Chapter 102 incompleteness review comments. Also, this response address permit application type changes, from the ESCGP-3 to the Erosion and Sediment Control Permit for Discharges of Stormwater Associated with Construction Activities Application (ESCP).

Transco has responded to the incompleteness review deficiencies as outlined in the attached incompleteness review comment / response tables. This document outlines the DEP comment and Transco's response to address the comment. Minor design changes, modifications and updates have been incorporated since the original submission, including addressing Chapter 102 incompleteness review deficiencies.

In transitioning the application from the ESCGP-3 to the ESCP, Transco has maintained the same application format to maintain consistency from the previously reviewed application materials. Transco has replaced the ESCGP-3 NOI with the ESCP Application and has also included Modules 1-4 for the ESCP application. An electronic copy of the ESCP Permit submittal has been uploaded onto PADEP's OnBase site. A check for \$1,000 made payable to the "Commonwealth of Pennsylvania Clean Water Fund" is included for the additional filing fees associated with the revised permit. The disturbed acres fees were previously provided with the original submission.

It is our hope that the information as provided will allow you to complete your review in accordance with your regulations and issue the requested ESCP Permit. If you require any additional information that will facilitate your review, please do not hesitate to contact Josh Henry at (412) 713-0485 or at Josh.Henry@williams.com or Karen Olson at (713) 215-4232 or at karen.olson@williams.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Dean", with a long horizontal flourish extending to the right.

Joseph Dean
Manager, Environmental Health and Safety

Enclosures

Attachment A-1 – ESCP Incompleteness Review Comment/Response – Monroe County

Attachment A-2 – ESCP Incompleteness Review Comment/Response – Chester County

Attachment A-3 – ESCP Incompleteness Review Comment/Response – Luzerne County

Attachment A-1 - ESCP Incompleteness Review Comment/Response - Monroe County		
Comment Number	DEP Comment	Response
<p><u>1. 25 Pa Code §102.4(b)(5)(v) The location of all surface waters of this Commonwealth which may receive runoff within or from the project site and their classification under Chapter 93.</u></p>	<p>A. Please update the Receiving Waters list on the NOI, plans, and other supporting documentation (as applicable) for the Effort Loop in Monroe County to the following (also provided are the approximately mile marker designations for each of the receiving waters):</p> <ul style="list-style-type: none"> i. Lake Creek (HQ-CWF, MF)-Beginning to Mile 43.75 ii. Princess Run (CWF, MF)-Beginning to Mile 44.8 iii. Weir Creek (CWF, MF)-Mile 44.5 to 44.7 iv. UNT to McMichael Creek (HQ-CWF, MF)-Mile 44.8 to 46.1 v. UNT to McMichael Creek (EV, MF)-Mile 46.1 to 46.5 and Mile 47.3 to 48.2 vi. UNT to Weir Creek (CWF, MF)-Mile 46.5 to 47.3 vii. UNT to Pohopoco Creek (CWF, MF)-Mile 48.2 to 48.9 viii. Sugar Hollow Creek (CWF, MF)-Mile 48.9 to 50.6 ix. Poplar Creek (EV, MF)-Mile 50.6 to 52.55 and Mile 52.9 to 53.2 x. UNT to Poplar Creek (EV, MF)-Mile 52.55 to 52.9 xi. Mud Run (HQ-CWF, MF)-Mile 52.9 to 54.3 xii. UNT to Mud Pond Run (EV, MF)-Mile 54.3 to 54.75 xiii. Mud Pond Run (EV, MF)-Mile 54.75 to 55.7 xiv. Long Pond to Tunkhannock Creek (HQ-CWF, MF)-Mile 55.7 to 56.7 xv. UNT to Tunkhannock Creek (Keiper Run) (HQ-CWF, MF)-Mile 56.7 to end 	<p>The updated permit forms/modules, drawings and narratives are updated to reflect these watershed designations and ranges. Mud Run is respresented with a range of 53.2 to 54.3. The existing use of Mill Creek (Luzerne County/Regional Energy Lateral) Sugar Hollow Creek and UNT to Pohopoco Creek were recently updated to HQ-CWF,MF and this designation is reflected throughout the application.</p>
	<p>b. EV Wetlands should be identified on the drawings and an EV wetlands anti-degradation analysis should be provided for any discharges to EV wetlands from the project. The analysis should be performed by the wetland biologist and should comment on the project's effect and potential impacts on the type of wetland present, the hydrology, soils, and vegetation of the wetland. The analysis should consider the following:</p>	<p>A table is now included on the E&S drawings identifying the EV wetlands for both the Effort Loop and Regional Energy Lateral. The E&S narratives for each pipeline have been updated to discuss EV wetlands.</p>
	<p>b.i. How the wetlands obtain their hydrology and how this project impacts it.</p>	
	<p>b.ii. What type of wetland is present and will the proposed project impact the vegetation and function of the wetland.</p>	
	<p>b.iii. Any primary and secondary impacts to the wetlands as a result of this Project.</p>	
<p><u>2. 25 Pa Code §102.4(b)(5)(viii) Supporting calculations and measurements.</u></p>	<p>a. Please update the Receiving Waters list in the E&S narrative, page 3.</p>	<p>The E&S narratives were updated with the revised receiving water information.</p>
	<p>b. Please provide North American Green (NAG) computer printouts for the design of the swale linings, indicating the swale linings specified are stable for the design flows. In addition, please specify the required staple pattern on the linings on the swale details and provide the staple pattern details on the drawings.</p>	<p>The computer printouts are included within Attachment 4 of each PCSM narrative within Section 3 of the application associated with channel designs at each facility. Attachment 3 of the E&S narrative within Section 2.0 of the application includes the computer printouts associated with the diversion channel designs. The staple patterns for the ECB are noted in the E&S drawing details within the Typical Channel/Diversion Channel Detail.</p>
	<p>c. Please provide North American Green (NAG) computer printouts for the step slope erosion control blankets, specifying the model and staple pattern. It is suggested the design take into account the worst-case scenario or blankets specified based on a range of slopes/lengths anticipated. Please specify the blanket and staple pattern required on the drawings.</p>	<p>The computer printouts are included within Attachment 3 of the E&S narrative for the Effort Loop and Regional Energy Lateral. The ECB drawing detail reflects the blanket and staple patterns for the Project. The plan drawings have been updated to show the staple patterns for each area of ECB.</p>
<p><u>3. 25 Pa Code §102.4(b)(5)(ix) Plan drawings.</u></p>	<p>a. Please label Contractor Yard CY-MO-001 on E&S Plans and SR Plans. Please show any temporary improvements (gravel, job trailers, etc) anticipated in the yard. Please identify on the plans the required restoration for the area (gravel removal, regrading, seeding, etc.) upon project completion.</p>	<p>The contractor yard is now labeled on the plans. Approximate locations of gravel areas are shown, which includes the entire yard. The label "Construction Support facilities, including gravel, parking, job trailers, etc. will be located within the contractor yard staging area limits of disturbance. Exact locations to be determined at the time of construction. Remove gravel and other site improvements and restore to existing conditions upon final restoration." Additionally, contractor yards on the other plan sets have been updated with similiar notes.</p>

<p><u>4. 25 Pa Code §102.6(a)(1) Submit to the Department or a conservation district a complete application or NOI, an E&S Plan meeting the requirements of §102.4 (relating to erosion and sediment control requirements), a PCSM Plan meeting the requirements of § 102.8 (relating to PCSM requirements), and other information the Department may require.</u></p>	<p>a. NOI, Section H: Portions of the project lie within the Brodhead/McMichaels Act 167 Plan area. Please identify this plan under the Act 167 Consistency portion of this NOI section. In addition, please check #3 (Alternative Design Standard) since the above-referenced plan is over 5 years old.</p>	<p>The Act 167 Verification Report located in Section 3-5 of the application has been updated to note the Brodhead/McMichaels Plan Area within the Effort Loop Project area. The PCSM Module 2 checks box 3 for Alternative Design Standard and has a note indicating the Act 167 Plan is greater than 5 years old, as applicable.</p>
	<p>b. NOI, Section H: under "a. PCSM Plan Summary". Please describe the final disposition/ restoration which will be provided for the access roads which will be utilized on the project. Please note any access roads not restored to existing conditions may require PCSM BMP's to mitigate Rate, Volume, and Water Quality impacts.</p>	<p>This description was not added in the new ESCP application form as this form does not have this section, however, the plan drawings and details identify the proposed road activities. Note 9 in the Access Road Detail was added indicating "Roads for temporary construction use are to be maintained and restored to their previous conditions in accordance with Chapter 102 Road Maintenance Activities. Plan view access road callouts identify the proposed road maintenance activity for the Project (i.e. maintenance only, temporary widening, etc.)".</p>
<p><u>5. 25 Pa Code §102.8(f)(8) Supporting calculations.</u></p>	<p>a. The rate control analysis indicates that discharge from the 100-year routings will overtop the infiltration berms. Please provide a calculation for the anticipated velocity over the berms and design an appropriate lining to withstand the velocity. The lining should extend 10 feet beyond the toe of the berm. Please provide the required lining and staple pattern on the infiltration berm detail.</p>	<p>The requested calculations are provided in Attachment 4 of each PCSM narrative within Section 3.0 of the application where these conditions occur. The lining and proposed staple pattern have been added to the infiltration berm detail.</p>
	<p>b. The maximum velocity values for Culverts #1-#3 on the MLV505LD86 site exceeds 7 fps. Please provide rock aprons at the culvert discharge to minimize erosion in the receiving channel.</p>	<p>Rip rap aprons have been added to these culvert outlets on the PCSM plans. Calculations and appropriate details were revised and are provided in this response.</p>
<p><u>6. 25 Pa Code §102.8(f)(9) Plan drawings.</u></p>	<p>a. Please label the Drainage Points of Interest (DA-1 and DA-2) on the PCSM Plans for MLV505LD86.</p>	<p>The drainage points of interest labels have been added to the PCSM plan sheet.</p>
	<p>b. Please label the Rock Apron designations on the PCSM Plans for MLV505LD86.</p>	<p>The Rock Apron Designations have been added to the PCSM Plan Sheet.</p>
	<p>c. Please label the side slope requirements on the Infiltration Basin and Infiltration Berm details.</p>	<p>The construction details and plan view identify the slope requirements at the Infiltration Basin and Berm.</p>
<p><u>7. 25 Pa Code §102.8(g)(2) Analysis demonstrating that the PCSM BMPs will meet the volume reduction and water quality requirements specified in an applicable Department approved and current Act 167 stormwater management watershed plan; or manage the net change for storms up to and including the 2-year/24-hour storm event when compared to preconstruction runoff volume and water quality. The analysis for the 2-year/24-hour storm event shall be conducted using the following minimum criteria:</u></p>	<p>a. Please make the following changes to the PCSM Spreadsheet for the MLV505LD86 site:</p>	
	<p>a.i. The soil testing performed on the site indicated raw infiltration rates near 18 inches/hr. Applying the recommended factor of safety of 2 results in an infiltration rate of 9 inches/hr and a 2-hour dewatering time. Please provide justification for the use of the 3 inches/hour rate used in the spreadsheet or revise the rate and dewatering time.</p>	<p>3"/hour was used as a conservative value to base the design. As suggested, a sensitivity analysis was performed using the 9"/hour which utilizes the recommended factor of safety to ensure that we were being conservative in all aspects of the design as well as the PCSM spreadsheets. After performing the analysis, 3"/hour was found to result in a more conservative design than using the 9"/hr, while both met the volume credit requirements in the PCSM spreadsheet.</p>
	<p>a.ii. Volume Tab: The infiltration Area for the various BMP's should be the area at the first outlet above the bottom of the BMP. The infiltration basin value should be 5278 sf.</p>	<p>The PCSM Worksheet has been revised to reflect the provided value.</p>
	<p>a.iii. Volume Tab: The infiltration period should be equal to the dewatering time for the facility (depth of water divided by infiltration rate). Please revise in conjunction with the comment above.</p>	<p>The infiltration period in the PCSM Worksheet has been revised.</p>
<p>a.iv. The Storage volume in the BMP's should be volume at the first outlet above the bottom of the basin or the inflow volume, whichever is less. Please revise the values for BMP 1 (1123 ft3), BMP 2 (751 ft3), and BMP 3 (2044 ft3).</p>	<p>The PCSM worksheet has been revised with the provided values for BMP 1 and 3. BMP 2 has been revised and the appropriate storage volume is shown in the worksheet.</p>	

Attachment A-2 - ESCP Incompleteness Review Comment/Response - Chester County	
DEP Comment	Response
1. The Drawing(s) show receiving surface water(s) and watershed boundaries, if applicable, within the project site and floodway or floodplain. Please identify all surface waters (i.e. if a pond exists around the wetlands to the northeast of the site) and show the watershed boundaries. [25 Pa Code §102.4(b)(5)(v)]	The drawings were updated to identify the existing pond and the watershed boundaries within the Project area.
2. The Drawing(s) identify all discharge points. Discharge point(s) is not identified on the E&SC plan drawings. [25 Pa Code §102.4(b)(5)(ix)]	A discharge point is not shown on the E&S plans, as structural BMP's (such as sediment basins, compost filter sock traps, etc.) are not proposed for Erosion and Sediment Control.
3. The Drawing(s) show existing and proposed utilities and site improvements. E&SC plan drawings do not show existing and proposed utilities at Compressor Station 200. [25 Pa Code §102.4(b)(5)(iii)]	The existing and proposed utilities are shown on the drawings. The PCSM BMP location was re-evaluated and it was further verified no utilities are located in this area.
4. The Drawing(s) show existing and proposed riparian buffer(s), if applicable. Please confirm if there are riparian buffers within 150' of the earth disturbance area or project site per 102.14(a) (i.e. pond). [25 Pa Code §102.4(b)(5)(xv)]	The pond is located within a non-special protection (CWF-MF) watershed. Based on correspondence on 06/10/2021, a riparian buffer is not required on the pond due to the watershed designation.
5. The Drawing(s) show the Avoidance Measures specified on the signed PNDI receipt, if applicable. Please confirm applicable PNDI avoidance measures are incorporated into the E&SC plan drawings for Compressor Station 200. [25 Pa Code §102.4(c)]	No avoidance measures are proposed. A bog turtle habitat assessment was completed in 2020 with no potentially suitable habitat identified. Coordination with the USFWS is ongoing for the Project.
6. The Drawing(s) provide for protection of infiltration PCSM BMPs until drainage areas are completely stabilized, if applicable. The E&SC plan drawings do not show the proposed infiltration facility as being protected from a reduction, loss, or failure. [25 Pa Code §102.4(b)(5)(vii)]	Infiltration berm protection is now included on the drawings via safety fence. Additionally, the construction sequence was updated to note safety fence to be installed around areas to be protected.
7. Three copies of the PCSM Plan Narrative (or one original and two copies of the complete PCSM Module 2 (3800-PM-BCW0406b)) were submitted and were completed. Please submit a completed Module 2. [25 Pa Code §102.6(a)(1)]	The permit was revised from an ESCGP-3 Application to an Erosion and Sediment Control Permit, which includes Modules 1-4. Module 2 is included with this submission.
8. The Drawing(s) show receiving surface water(s) and watershed boundaries, if applicable, within the project site and floodway or floodplain. Please identify all surface waters (i.e. if a pond exists around the wetlands to the northeast of the site) and show the watershed boundaries. [25 Pa Code §102.8(f)(5)]	The drawings were updated to identify the existing pond and the watershed boundaries within the Project area.
9. The Drawing(s) identify all discharge points. [25 Pa Code §102.8(f)(9)]	Discharge points across the Project have been identified on the PCSM and E&S drawings.
10. The Drawing(s) show existing and proposed riparian buffer(s), if applicable. Please confirm if there are riparian buffers within 150' of the earth disturbance area or project site per 102.14(a) (i.e. pond). [25 Pa Code §102.8(f)(14)]	The pond is located within a non-special protection (CWF-MF) watershed. Based on correspondence on 06/10/2021, a riparian buffer is not required on the pond due to the watershed designation.
11. The Drawing(s) show the Avoidance Measures specified on the signed PNDI receipt, if applicable. Please confirm. [25 Pa Code §102.8(f)(15)]	No avoidance measures are proposed. A bog turtle habitat assessment was completed in 2020 with no potentially suitable habitat identified.
12. The Drawing(s) show the location of test pits used for infiltration testing as cross-referenced to PCSM Module 2, Infiltration Information. [25 Pa Code §102.8(g)(1)]	The test pits are now included on the revised PCSM drawings.

Attachment A-3 - ESCP Incompleteness Review Comment/Response - Luzerne County

Comment Number	DEP Comment	Response
<u>1. Fully completed, properly signed, and notarized NOI form [25 Pa Code §102.6(a)(1)]:</u>	a. Page 9 of the NOI regarding the off-site discharge is inconsistent with Page 11 of the NOI.	The permit was revised from an ESCGP-3 Application to an Erosion and Sediment Control Permit. The ESCGP-3 NOI form is no longer applicable. Offsite discharge reports are included within the application.
	b. Section G of NOI: Please explain what Road Maintenance Activities are proposed.	The plan drawings and details identify the proposed road maintenance activities. Note 9 in the Access Road Detail was added indicating "Roads for temporary construction use are to be maintained and restored to their previous conditions in accordance with Chapter 102 Road Maintenance Activities. Plan view access road callouts identify the proposed road maintenance activity for the Project (i.e. maintenance only, temporary widening, etc.)".
	c. Section H of NOI: The verification report could not be located.	The verification report is included under Section 3-5 of the application, as it was previously omitted in the submission to Luzerne County.
	d. Page 14 of the NOI: Worksheet 10 was not provided.	The permit was revised from an ESCGP-3 Application to an Erosion and Sediment Control Permit. The ESCGP-3 NOI form is no longer applicable. The Stormwater BMP Manual Appx. D Worksheet includes the water quality worksheet.
<u>2. Complete PCSM/SR Plans 25 Pa Code §102.8(f)(9):</u>	a. The PCSM plan for the Compressor Station should be separate from the E&S plan and labeled PCSM.	The PCSM narrative and drawings for Compressor Station 515 are included under Section 3.4.1 and 3.4.2 of the application.
	b. The applicant's name, company, government agency, or entity that is to have ownership and responsibility for the PCSM BMP's should be specifically named.	Within the PCSM Details, under the Long Term Operation and Maintenance Schedule, a statement has been added indicating "Transcontinental Gas Pipe Line Company, LLC. will be responsible for the long term operation and maintenance of the post-construction stormwater management facilities proposed at the site."
<u>3. PCSM Earth Disturbance Activity [25 Pa Code §102.4(b)(5)(ix)]:</u>	a. Proposed contours are not provided for channels.	The proposed channel contours at PCSM Facilities have been updated and are shown on the drawings.
	b. Please confirm that MLV-515RA20 Collector Channel will be conveying sediment laden runoff to Dry Extended Detention Basin as labeled.	The collector channels will be part of the PCSM construction and will not carry sediment laden water.
	c. MLV-515RA20 basin and apron details not provided. Please verify all PCSM BMP details are provided.	The basin has been revised to an infiltration berm. The infiltration berm and apron details have been added to the PCSM BMP details at this facility.
	d. MLV-515RA20 Infiltration Bed detail does not provide elevations.	The PCSM plans have been revised to show the proposed elevations and conditions for the valve pad. An infiltration bed is not proposed at this site.
	e. Hildebrandt and Carverton: There appears to be a conflict between the proposed pipeline and infiltration BMPs. Please revise.	Infiltration is proposed within the Hildebrandt Tie-in/MLV-515RA40 valve pad, as well as the Lower Demunds REL Tie-In and MLV-515RA30 Valve Pad. Based on past correspondence, trench plugs have been added to these facilities to contain stormwater within the pad area. Notes were added to the Long Term Operation and Maintenance to provide a plan and restoration guidance for potential maintenance activities that may occur during the life of the facility. The Carverton Site does not propose infiltration within the pad and no conflict is occurring at this site.
<u>4. PCSM Site Characterization 25 Pa Code §102.8(f)(3):</u>	a. As per the Pennsylvania Stormwater Best Management Practices Manual, Appendix C, Protocol 2, a 2-foot clearance should be maintained between the bottom and the bedrock, etc. The proposed PCSM BMPs have the potential to have an inadequate distance as specified by the manual. Please provide testing/documentation that shows an adequate distance exists or revise the BMPs as required.	Each site with PCSM BMP's with infiltration proposed were reviewed to verify the 2-foot of separation. Those BMP's that did not meet the 2-foot of separation were revised to provide the adequate separation. The notes within the PCSM drawings have been updated to clarify the separation information used for the Project design. The PCSM Narratives within Section 3.0 of the application outline the separation identified for each PCSM BMP.