



June 2, 2021

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

Re: Incompleteness Review Letter
Erosion & Sediment Control Permit Application
Regional Energy Access Expansion Project
DEP Application No. ESG830021002-00
APS No. 1036787; AUTH ID No. 1350583
Buck Township, Bear Creek Township, Plains Township, Jenkins Township, Laflin
Borough, Wyoming Borough, West Wyoming Borough, Kingston Township & Dallas
Township, Luzerne County
Ross Township, Chestnut Hill Township, Tunkhannock Township, Monroe County
Lower Mount Bethel Township, Northampton County
Lower Makefield Township, Ivyland Borough, Bucks County
Marcus Hook Borough, Delaware County
East Whiteland Township, Chester County
Peach Bottom Township, York County

Dear Mr. Dean:

The Department of Environmental Protection (DEP) has reviewed the above referenced application and has determined that it is incomplete, the following list specifies the items that must be included in the resubmittal of your application and/or the submission of additional information. 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 items listed below. The items are based on applicable laws and regulations, and the guidance sets forth the DEP's preferred means of satisfying the applicable regulatory requirements.

As stipulated in 25 Pa. Code § 102.6(c) of DEP's Chapter 102 rules and regulations (regarding complete applications) information requested by this office must be received within sixty (60) calendar days from the date of this letter, on or before **August 1, 2021**, or DEP will consider the application to be withdrawn by the applicant and no further action will be taken on the application. Fees are not refunded when an application is considered to be withdrawn.

Items for Resubmittal or Submission of Additional Information

I. The following comments are for the portions of the project that are within Monroe County:

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.

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):

- 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

- 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:
 - i. How the wetlands obtain their hydrology and how this project impacts it.
 - ii. What type of wetland is present and will the proposed project impact the vegetation and function of the wetland.
 - iii. Any primary and secondary impacts to the wetlands as a result of this project.

2. 25 Pa Code §102.4(b)(5)(viii) Supporting calculations and measurements.

- a. Please update the Receiving Waters list in the E&S narrative, page 3.
- 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 for the linings on the swale details and provide the staple pattern details on the drawings.
- 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.

3. 25 Pa Code §102.4(b)(5)(ix) Plan drawings.

- 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.

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.

- 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.
- 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.

5. 25 Pa Code §102.8(f)(8) Supporting calculations.

- 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.
- 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.

6. 25 Pa Code §102.8(f)(9) Plan drawings.

- a. Please label the Drainage Points of Interest (DA-1 and DA-2) on the PCSM Plans for MLV505LD86.
- b. Please label the Rock Apron designations on the PCSM Plans for MLV505LD86.
- c. Please label the side slope requirements on the Infiltration Basin and Infiltration Berm details.

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:

- a. Please make the following changes to the PCSM Spreadsheet for the MLV505LD86 site:
 - 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.
 - 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.
 - 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.
 - 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).
- II. The following comments are for the portions of the project that are within Chester County:
 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)]
 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)]
 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)]
 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)]

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)]
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)]
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)]
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)]
9. The Drawing(s) identify all discharge points. [25 Pa Code §102.8(f)(9)]
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)]
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)]
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)]

III. The following comments are for the portions of the project that are within Luzerne County:

1. Fully completed, properly signed, and notarized NOI form [25 Pa Code §102.6(a)(1)]:
 - a. Page 9 of the NOI regarding the off-site discharge is inconsistent with Page 11 of the NOI.

- b. Section G of NOI: Please explain what Road Maintenance Activities are proposed.
 - c. Section H of NOI: The verification report could not be located.
 - d. Page 14 of the NOI: Worksheet 10 was not provided.
2. Complete PCSM/SR Plans 25 Pa Code §102.8(f)(9):
 - a. The PCSM plan for the Compressor Station should be separate from the E&S plan and labeled PCSM.
 - 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.
 3. PCSM Earth Disturbance Activity [25 Pa Code §102.4(b)(5)(ix)]:
 - a. Proposed contours are not provided for channels.
 - b. Please confirm that MLV-515RA20 Collector Channel will be conveying sediment laden runoff to Dry Extended Detention Basin as labeled.
 - c. MLV-515RA20 basin and apron details not provided. Please verify all PCSM BMP details are provided.
 - d. MLV-515RA20 Infiltration Bed detail does not provide elevations.
 - e. Hildebrandt and Carverton: There appears to be a conflict between the proposed pipeline and infiltration BMPs. Please revise.
 4. PCSM Site Characterization 25 Pa Code §102.8(f)(3):
 - 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.

You may request a time extension, in writing, before **August 1, 2021**, to respond to the deficiencies beyond the sixty (60) calendar days. Requests for time extension will be reviewed by DEP and considered. You will be notified in writing of the decision either to grant or deny, including the specific due date to respond if the extension is granted. Time extensions shall be in accordance with 25 Pa. Code § 102.6(c).

Should you have any questions regarding the identified deficiencies, please contact Michael Luciani at 570-826-2597 or mluciani@pa.gov and refer to Application No. ESG830021002-00, 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>.

Sincerely,



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

cc: Kevin C. Clark, P.E., BAI Group, LLC (by email)
Luzerne Conservation District (by email)
Monroe County Conservation District (by email)
Northampton County Conservation District (by email)
Bucks County Conservation District (by email)
Chester County Conservation District (by email)
York County Conservation District (by email)
Buck Township (by email)
Bear Creek Township (by email)
Plains Township (by email)
Jenkins Township (by email)
Laflin Borough (by email)
Wyoming Borough (by email)
West Wyoming Borough (by email)
Kingston Township (by email)
Dallas Township (by email)
Ross Township (by email)
Chestnut Hill Township (by email)
Tunkhannock Township (by email)
Lower Mount Bethel Township (by email)
Lower Makefield Township (by email)
Ivyland Borough (by email)

Marcus Hook Borough (by email)
East Whiteland Township (by email)
Peach Bottom Township (by email)
Northeast Regional ARD (by email)
Northeast Regional Waterways and Wetlands (by email)
Southeast Regional ARD (by email)
Southeast Regional Waterways and Wetlands (by email)
Southcentral Regional ARD (by email)
Southcentral Regional Waterways and Wetlands (by email)