



June 26, 2025

Electronic submission via Public Upload

Pennsylvania Department of Environmental Protection
Regional Permit Coordination Office
Rachel Carson State Office Building
400 Market Street, Harrisburg, PA 17101
Attn: Rebecca Albert, P.G.

Re: ESC Permit Application No. ESP830024001-00
Tioga Pathway Project
Brookfield, Westfield, Deerfield, Chatham, and Middlebury Townships; Tioga County
Alleghany and Harrison Townships; Potter County
Liberty Township; McKean County

On November 11, 2024, National Fuel Gas Supply Corporation (“National Fuel”) electronically submitted an Erosion and Sediment Control Permit For Discharges Of Stormwater Associated With Construction Activities Application to the Regional Permit Coordination Office (“RPCO”) of the Pennsylvania Department of Environmental Protection (“PADEP”) for the Tioga Pathway Project (“Project”) located in Tioga, Potter, and McKean Counties, Pennsylvania. Copies of the application were also submitted to each corresponding county conservation district.

On May 2, 2025, National Fuel and Tetra Tech, Inc. (“Tetra Tech”) – National Fuel’s engineering consultant – received a Technical Deficiency Letter from the PADEP. The following information is provided in response to the PADEP’s technical comments and all of the supporting documents (i.e., revised attachments/files, etc.) have been electronically uploaded to the appropriate RPCO project Public Upload site and submitted electronically to each corresponding county conservation district.

E&S Plan

1. *The procedure for the removal of the existing pipe is vague. Please provide more information on how the pipe will be removed and how this will be reflected on the drawings/details. Such as, near Chapter 105 resources, recycling and disposal, timing of BMP installation, etc. [25 Pa Code §102.4(b)(5)]*

Response: Procedures for removal of the existing pipeline are detailed in the construction sequence developed for the Project. The construction sequence is reflected on the drawings in the notes provided on E&S Plan drawing sheet ES-0.08. The construction sequence is also provided in the E&S Plan narrative on pages 9 through 14. Specific clarifications for the topics mentioned in the comment above are as follows:

- Specific procedures for how the existing pipeline will be removed are detailed in steps 9 and 10 of the construction sequence notes available in column 3 on drawing sheet ES-0.08.
- Specific procedures for construction near Chapter 105 resources are detailed in the notes sections titled “Stream Crossing Construction Sequence and General Notes” and “Wetland Crossing Construction Sequence and General Notes” available in column 4 on drawing sheet ES-0.08, which have been developed as part of the overall construction sequence.
- Specific procedures for recycling and disposal of construction waste are detailed in the notes section titled “Recycling and Disposal Procedures of Construction Waste” available in

column 2 on drawings sheet SR-0.01. E&S Plan drawing sheet ES-0.09 has been revised to include the “Recycling and Disposal Procedures of Construction Waste” notes in column 1.

- Timing of BMP installations is detailed in steps 4 through 8 of the construction sequence notes available in column 3 on drawing sheet ES-0.08.

2. *BMPs appear to be insufficient along the ROW where existing drainage swales parallel the ROW; typically from Municipal or State roadways. Please reevaluate project-wide, example on page ES-1.05. [25 Pa Code §102.4(b)(5)]*

Response: The entire Project right-of-way depicted on the E&S Plan drawings has been reviewed. Where necessary, adjustments to the proposed E&S BMPs were made for clarity of their intended application; and, additional E&S BMPs were identified on the plan drawings at locations where implementation of BMPs may have needed improvement (e.g., existing drainage swales, roadway ditches, etc.).

Tioga County Comments

3. *Please identify trench plugs on the drawings for ES-1.13 by wetland W14 PEM by match line to ES-1.12, ES-1.14 by W54 PEM by temporary access road, ES-1.15 by UNT to Cowanesque River S23, ES-1.25 stream S67 and wetland W59, ES-1.33 by wetland W32, ES-1.37 by wetland W39, ES-1.45 Stream crossing, and ES-1.47 Stream crossing as per the E&S Manual pages 284 to 290. [25 Pa Code §102.11(a)(1)]*

Response: For the locations mentioned in the comment above, no trenching applicable to the use of trench plugs is proposed. Specific clarifications of proposed activities at each of the locations are described as follows:

- ES-1.13 depicts a timber mat crossing of wetland W14 requiring no excavation;
- ES-1.14 revised to show alignment of the cathodic protection ground bed wire and the trench plugs associated with installation through wetland W54;
- ES-1.15 depicts a timber mat placed on an existing driveway overtop of existing culverts at the temporary access road crossing of stream S23 requiring no excavation (Note: trench plugs are already identified for installation at the location where the pipeline will cross stream S23);
- ES-1.25 depicts a timber mat placed on an existing driveway overtop of existing culvert at the temporary access road crossing of stream S67 requiring no excavation. Additionally, ES-1.25 depicts a timber mat crossing of wetland W59 and the horizontal directional drilling alignment beneath W59, both requiring no excavation;
- ES-1.33 depicts a timber mat crossing of wetland W32 requiring no excavation;
- ES-1.37 depicts a timber mat crossing of wetland W39 requiring no excavation;
- ES-1.45 depicts a timber mat placed on an existing driveway overtop of an existing culvert at the temporary access road crossing of stream S56 requiring no excavation; and,
- ES-1.47 depicts a temporary equipment bridge placed at the temporary access road crossing of stream S68 and wetland W56, and temporary portable bridges placed at the temporary access road crossings of stream S63 and stream S64, none of which require excavation.

4. *It is difficult to identify silt socks and locations due to clutter and being the same color as the LOD. Please revise the plans to avoid clutter as per the E&S Manual page 397 (first paragraph). [25 Pa Code §102.11(a)(1)]*

Response: Color of the compost filter socks identified throughout the E&S Plan drawings has been revised from red to magenta for clarity in distinguishing the filter socks from other objects.

5. *Please provide temporary and permanent access roads standard construction detail. [25 Pa Code §102.4(b)(5)(iii)]*

Response: A standard detail for Typical Aggregate Access Road construction is available on E&S Plan drawing sheet ES-0.10 and PCSM/SR Plan drawing sheet SR-0.03. This detail applies to the construction of both temporary and permanent access roads proposed for the Project at locations where an existing access road is not already present.

6. *On ES-1.24 between 510+00 and 512+00, it appears to be wetland W57 PEM and a stream (not identified) in the LOD with no Best Management Practices. Please verify and label accordingly. [25 Pa Code §102.4(b)(5)(ii) & §102.8(f)(3)]*

Response: E&S Plan drawing sheet ES-1.24 has been revised to identify stream S65, and the associated compost filter sock installation updated to better protect the stream and wetland. Since the existing use of the upland area adjacent to the stream and wetland is agricultural, erosion control blanket is not proposed for installation associated with these resources.

7. *ES-1.33 between 782+00 and 784+00, it appears to be wetland W32 PSS in the LOD with no Best Management Practices. Please verify and label accordingly. [25 Pa Code §102.4(b)(5)(ii) & §102.8(f)(3)]*

Response: E&S Plan drawing sheet ES-1.33 has been revised to include installation of compost filter sock on the upslope of wetland W32 as an E&S BMP in addition to the proposed trench plugs and erosion control blanket that are already identified on the drawing.

8. *Please include the manufacturers specifications for stapling of Erosion Control Blanket. [25 Pa Code §102.4(b)(5)(iii)]*

Response: The Erosion Control Blanket Installation detail on E&S Plan drawing sheet ES-0.10 and PCSM/SR Plan drawing sheet SR-0.03 have been revised to include the manufacturer staple pattern guide.

Application Form

9. *Please include all names of receiving waters on the Stormwater Discharge Information section of the Notice of Intent (NOI). There should be consistency between Post Construction Stormwater Management/Site Restoration Plan Narrative, Section 6.1, Stream Crossings, and Stormwater Discharge Information Section. [25 Pa Code §102.8(f)(8)]*

Response: The Stormwater Discharge Information section on page 5 of the NOI application form has been revised accordingly and is consistent with section 6.1 of the PCSM/SR Plan narrative.

PCSM Report

10. *The Department does not accept the PCSM worksheets. Please provide the PCSM Spreadsheets for each location that is proposing PCSM BMPs. The PCSM Spreadsheets can be found in this link (DEP_PCSM_Spreadsheet.xlsb). [25 Pa Code §102.8(f)(8)]*

Response: The PCSM worksheets originally provided for each PCSM BMP location have been replaced with corresponding DEP PCSM Spreadsheets. Attachment 4 Supporting Calculations provided in the PCSM/SR Plan narrative has been revised accordingly.

11. *Please identify within the Post Construction Stormwater Management/Site Restoration Plan Narrative which hydrograph report(s) corresponds with the appropriate site on the Post Construction Stormwater Management/Site Restoration Plan. [25 Pa Code §102.8(f)(8)]*

Response: Attachment 4 Supporting Calculations provided in the PCSM/SR Plan narrative has been re-organized for clarity. The DEP PCSM Spreadsheets, rainfall data, and hydrograph reports for each site identified on the PCSM/SR Plan drawings are grouped together and separated by flysheets.

12. *Please provide the infiltration period (draw down time) for each individual geocell infiltration bed. [25 Pa Code §102.8(f)(8)]*

Response: Attachment 4 Supporting Calculations provided in the PCSM/SR Plan narrative has been revised to include BMP Supporting Calculations, including an infiltration period calculation, for each geocell location.

13. *Please provide a maximum impervious loading ratio of 5:1 (impervious area to infiltration bed area) and the maximum loading ratio of 8:1 (total drainage area to infiltration bed area) for each proposed geocell infiltration bed. [25 Pa Code §102.8(f)(8)]*

Response: Attachment 4 Supporting Calculations provided in the PCSM/SR Plan narrative has been revised to include BMP Supporting Calculations, including loading ratio calculations, for each geocell location.

14. *Please provide a detailed description of the proposed horizontal directional drill. The description should include all proposed work, depths of entry and exit pits, depth of the bore, waters of the Commonwealth that are affected, etc. [25 Pa Code §102.8(f)(8)]*

Response: Specific details for the horizontal direction drill (“HDD”) are available in the HDD Feasibility Report provided as part of this response package (ITEM 9 – HDD Feasibility Report).

PCSM Plan

15. *Please show on the Post Construction Stormwater Management/Site Restoration Plans the depth of the proposed Geoweb infiltration bed. [25 Pa Code §102.8(f)(9)]*

Response: The Geoweb Cellular Confinement System detail on E&S Plan drawing sheet ES-0.15 and PCSM/SR Plan drawing sheet SR-0.08 has been revised to more clearly identify that the total depth of the Geoweb infiltration bed is 8-inches.

16. *Please provide a profile of the proposed YM59 PAR-9 permanent gravel access road. The profile should include how the proposed Geoweb infiltration bed will adequately infiltrate the stormwater volume as required. Should the Geoweb infiltration bed be at an angle, calculations should be provided showing that the infiltration bed can adequately infiltrate the required stormwater volume. [25 Pa Code §102.8(f)(9)]*

Response: The E&S Plan has been revised to include drawing sheet ES-0.17 and the PCSM/SR Plan revised to include drawing sheet SR-0.10, both of which include the plan view for YM59 PAR-9 in addition to a newly provided profile of the access road. The plan view and profile identify location of the geoweb infiltration bed intended specifically for volume management. The angle of this location is minimal at 1.5%, which should have no significant impact on the performance of the BMP. The remainder of the geoweb within the access road is intended to support rate control and stabilization of the access road.

17. *The Post Construction Stormwater Management/Site Restoration Plans show the location of the proposed Lee Hill Interconnect. Please provide on the Plans the location of any land cover changes associated with this interconnect (gravel, pavement, etc.). [25 Pa Code §102.8(f)(9)]*

Response: The Lee Hill Interconnect is an existing facility recently constructed as a project separate from the Tioga Pathway Project. The facility is not shown on the aerial imagery in the plan drawings since construction of the facility was subsequent to the date of the most recent aerial imagery that is available. However, E&S Plan drawing sheet ES-1.41 and PCSM/SR Plan drawing sheet SR-1.41 have been revised to identify edge of existing gravel at the facility.

Also, activities at the Lee Hill Interconnect will include only those relating to tying-in of the proposed YM-59 pipeline to the facility. No land cover changes associated with the Lee Hill Interconnect are proposed as part of the Tioga Pathway Project.

18. *Please show on the Post Construction Stormwater Management/Site Restoration Plans the locations of the proposed entry and exit pits for the HDD. The Plans should show the sizes, dimensions, depths, and any support activities that may be associated with the proposed HDD. [25 Pa Code §102.8(f)(9)]*

Response: E&S Plan drawing sheet ES-1.25 and PCSM/SR Plan drawing sheet SR-1.25 have been revised to show location and orientation of the HDD entry and exit pits. Notes have also been added to the plan sheets identifying dimensions of the pits.

19. *Please show the profile of the proposed YM59 natural gas pipeline along the proposed HDD route on the Post Construction Stormwater Management/Site Restoration Plans. The profile should also include the depth of cover for the proposed pipeline. [25 Pa Code §102.8(f)(9)]*

Response: E&S Plan drawing sheet ES-1.25 and PCSM/SR Plan drawing sheet SR-1.25 have been revised to show the profile of the proposed HDD route. Depth of cover varies along the HDD route; however, depth can be determined at any specific location using the elevations provided on the profile. Notes identifying depth at water resource crossings have been provided.

20. *It appears that the proposed HDD exit pit will be located within Wetland W59. Please move the HDD exit pit out of any watercourse or wetland along the pipeline route. [25 Pa Code §102.8(f)(9)]*

Response: E&S Plan drawing sheet ES-1.25 and PCSM/SR Plan drawing sheet SR-1.25 have been revised to show that the proposed HDD exit pit will be located outside of Wetland W59.

Additional Technical Deficiencies

21. *The project proponent should identify all properties within 450-feet of the HDD centerline to inquire as to whether a private well or other water supply (e.g., spring) is present on the property and notify them of the proposed drilling. [25 Pa Code §102.11(a)(4)]*

Response: Landowner notifications, including those within 450 feet of the proposed HDD, are performed by National Fuel as part of the Environmental Assessment submitted as part of the Joint Permit application prepared for the Project. National Fuel will notify landowners again prior to construction, including those within 450 feet of the proposed HDD and will inquire again as to whether a private well or other water supply is present on the property.

22. *The Inadvertent Return Plan should be revised to include the following key information:*
- a. When an IR or loss of circulation is discovered, the IR or loss of circulation should be immediately reported to DEP as required under 25 Pa. Code §78a.68a(i) and §91.33.*
 - b. When an IR is discovered (regardless of whether the IR is to uplands or waters of the Commonwealth), it should be immediately reported to DEP as required under 25 Pa. Code §78a.68a(i) and §91.33.*

An example Inadvertent Return PPC Plan is provided on the Department's Trenchless Technologies Resources Page which can be found here: <https://www.dep.pa.gov/About/Regional/RPCO/Pages/Trenchless.aspx>

Response: Noted; the Inadvertent Return Plan has been revised accordingly and submitted as part of the Joint Permit application prepared for the Project.

Additional Consideration

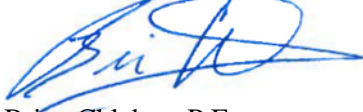
- *Prior to HDD advancement, surface casing should be installed within granular unconsolidated overburden, as detailed within the HDD Feasibility Report, to isolate the problematic overburden material and reduce the risk of an inadvertent return. [25 Pa Code §102.11(a)(1)]*

Response: A surface casing is proposed to be installed at both the HDD entry and exit points as shown on the HDD Plan and Profile. Specific details for the HDD are available in the HDD Feasibility Report provided as part of this response package (ITEM 9 – HDD Feasibility Report).

We believe these responses and the information provided should adequately address the technical deficiency comments received from RPCO. Feel free to contact me at (330) 318-4291 or at brian.chlebus@tetrattech.com, or Lauren McMillan at (814) 871-8195 or at mcmillanl@natfuel.com if you require additional information. Thank you.

Regards,

TETRA TECH, INC.



Brian Chlebus, P.E.
Civil Engineer

Attachments

cc: File 212C-BF-00493

Sandy Lare, Tetra Tech (by email via Tetra Tech FTP)

Lauren McMillan, National Fuel (by email via Tetra Tech FTP)

Scott Moore, Tioga County Conservation District (by email via Tetra Tech FTP)

Glenn Dunn, Potter County Conservation District (by email via Tetra Tech FTP)

Sandy Thompson, McKean County Conservation District (by email via Tetra Tech FTP)