



August 10, 2020

Christopher Smith, P.E.
Chief, Construction Permits Section
Waterways and Wetlands
PADEP Southeast Region
2 East Main Street
Norristown, PA 19401

RE: Technical Deficiency Letter
Erosion and Sediment Control General Permit (ESCGP)
Permit Application No. ESG 01 00 19 001
JMT Job No. 18-00672-001

Dear Mr. Smith:

Johnson, Mirmiran & Thompson (JMT) is pleased to submit the Comment Resolution Summary letter in response to the Technical Deficiency Letter – Erosion and Sediment Control General Permit (ESCGP) for Adelpia Gateway Project – Phase 2A, dated July 30, 2020.

The resubmission includes the following revised documents:

- Notice of Intent for ESCGP-3 for Adelpia Gateway Project- Tilghman Lateral Phase 2A, signed and notarized, with completed Checklist
- Adelpia Gateway Project, Erosion and Sediment Control Plan and Post Construction Stormwater Management Plan, Tilghman Lateral -Phase 2A, dated 08/10/2020
- Erosion and Sediment Control Report, dated August 2020
- Post Construction Stormwater Report, dated August 2020

The following are our responses to comments:

Technical Deficiencies:

1. **PADEP Comment (7/31/20):** Your plan calls for trenches to be open with stockpiled material in the roadway for up to thirty days. The roadway is curbed. How will you be preventing drainage problems? [Chapter 102.11 (a) (1)]

JMT Response (8/10/20): *General Note #57 has been added to indicate that excavated material shall not be stockpiled within the roadway. Excavated material shall be stored in a dump truck, at the Marcus Hook Compressor station, or Transco Station Meter Station.*

2. **PADEP Comment (7/31/20):** At a minimum, the E & S plan should address the separate documents for directional drilling and inadvertent release contingency plans as these documents relate to the conditions of the 401 Water Quality Certificate. [Chapter 102.11 (a) (1)]

JMT Response (8/10/20): *References for the Inadvertent Release Contingency and HDD Design and Constructability Review Report have been added to the Cover Sheet under Reference Documents.*

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3. **PADEP Comment (7/31/20):** Please add a note to Sheet SR-9 that the Tilghman Lateral 2B will be submitted as a permit amendment at a later date. [Chapter 102.11 (a) (1)]

JMT Response (8/10/20): *Note #1 has been added to Sheet SR-9 to indicate that the Tilghman Lateral Phase 2B will be submitted as a permit amendment at a later date.*

4. **PADEP Comment (7/31/20):** Sequence of construction should address removal of erosion and sediment control devices once the site is stabilized. [Chapter 102.11 (a) (1)]

JMT Response (8/10/20): *Construction Sequence on SR-3, Note #11, was updated to note that contractor shall remove erosion and sediment control devices once site work is complete and a uniform 70% vegetative cover is established. Areas disturbed during removal of BMPs must be stabilized immediately.*

5. **PADEP Comment (7/31/20):** A stabilized construction entrance should be provided. The notes suggest one would be installed if determined to be needed. [Chapter 102.11 (a) (1)]

JMT Response (8/10/20): *A rock construction entrance detail with wash rack has been added to SR-5.*

6. **PADEP Comment (7/31/20):** Sheet SR-7 – inlet directly below Parkway Lateral does not illustrate inlet protection. [Chapter 102.11 (a) (1)]

JMT Response (8/10/20): *Inlet protection has been added to the inlet below the Parkway Lateral.*

7. **PADEP Comment (7/31/20):** It seems that a portion of the project site drains to a receiving surface water (named Naaman's Creek) which is located in the State of Delaware. Based on the review of the Section 303 Integrated List (dated 2018) prepared by the State of Delaware, this surface water (Naaman's Creek) is impaired for Nitrogen, Phosphorus, and Enterococcus bacteria. At this point, without evidence to the contrary, these impairments may be related to siltation, and it will need to be reviewed as a siltation-impaired surface water. Following the ESCGP-3 instructions for an impaired surface water where the cause of the impairment is identified as siltation, please update the Section I. Antidegradation Analysis (for E&S and PCSM) of the application (and the other sections of the application regarding Siltation-Impaired) for this receiving surface water, accordingly, and that non-discharge alternatives and ABACT BMPs should be considered and employed. Further, any potential construction entrance(s) that may be located within this watershed will need to be upgraded to an ABACT construction access. Please add an upgraded ABACT construction access detail to the E&S Plans for this watershed. [ESCGP-3 Application]

JMT Response (8/10/20): *All documentation has been updated to indicate that Naaman's Creek is siltation impaired. Please refer to the following references: NOI Section I, Plan Notes on SR-7 to SR-9, E&S Report Narrative Section V and X, PCSM Report Section V and X. ABACT BMPs, such as rock construction entrance with wash rack, compost filter sock and filter bag inlet protection is detailed on the plan sheets.*

8. **PADEP Comment (7/31/20):** Please demonstrate in the applicant's response letter, the PCSM Narrative, and the PCSM Plan Drawings how the permittee and/or co-permittee will address each of the components (aka subsections) listed at 102.8(n) for the areas to be restored following 102.8(n) at part of this ESCGP-3 permit application. Please address subsections 102.8(b), (c), (e), (f), (h), (i), and (l) and when applicable, subsection (m) for areas to be restored following 102.8(n). [25 Pa Code § 102.8(n)]

JMT Response (8/XX/20): *Additional responses have been added to the Chapter 102 Compliance Table within Appendix C of the PCSM report.*

If you have any questions or need further information, please do not hesitate to contact me at 215-496-4780 or smathew@jmt.com.

Very truly yours,

JOHNSON, MIRMIRAN & THOMPSON, INC.



Shiny M. Mathew, P.E.
Senior Associate
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AH/sm
Enclosures

Cc: Keith Edmonds, NJR
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