



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office

February 28, 2018

Pam Alley
Manager, Land and Permitting
Shell Pipeline Company, LP
150 North Dairy Ashford
Houston, TX 77079

Re: Technical Deficiency Letter
NPDES Permit No.: ESG00007170003
APS ID# 961304, AUTH ID# 1217190
Falcon Ethane Pipeline System
North Fayette and Findlay Townships, Allegheny County
Independence, Raccoon, Greene and Potter Townships, Beaver County
Chartiers, Mount Pleasant and Robinson Townships, Washington County

Dear Ms. Alley:

The Department of Environmental Protection (DEP) has identified the attached significant technical deficiencies pursuant to 25 Pa. Code § 102.11. 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 deficiencies listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth the DEP's established means of satisfying the applicable regulatory and statutory requirements.

Pursuant to Title 25 Pa. Code § 102.6 (c), you must submit a response fully addressing each of the significant technical deficiencies set forth above within 60 calendar days from the date of this letter or DEP may consider the application withdrawn. If you need additional time to address the technical deficiencies you must make that request in writing to DEP during the 60 calendar day time period. The written request for extension will be reviewed by DEP and either granted with a specific due date, or denied.

Please submit with a copy of this letter **3 copies of the revised E&S plans and 1 copy of the revised PCSM plan** to the District at: 156 Cowpath Road, Aliquippa, PA 15001 and the remaining **2 copies of the revised PCSM plan and 1 copy of the E&S plans** to the Department at: Waterways & Wetlands Program, 400 Waterfront Drive, Pittsburgh, PA 15222.

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. Please keep in mind that if you fail to respond, your application will be considered withdrawn.

Should you have any questions regarding the identified deficiencies, please contact **Katie Staudenmeier** at **Beaver County Conservation District** for questions regarding erosion and sediment control comments or contact **Howard Kellick, P.E.** of my staff at 412-442-4074 or hkellick@pa.gov and refer to the Application and Authorization numbers listed above to discuss your concerns or to schedule a meeting. Please be advised that the meeting must be scheduled within the 60-day period allotted for your reply, and a complete set of responses must be received within the 60-day period even if a meeting is requested.

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,



Gregory W. Holesh, P.E.
Environmental Group Manager
Permitting & Technical Services
Waterways & Wetlands Program

Enclosure(s)

cc: Allegheny County Conservation District
Beaver County Conservation District
Washington County Conservation District
Joseph Ryan, AECOM
North Fayette Township
Findlay Townships
Independence Township
Raccoon Township
Greene Township
Potter Township
Chartiers Township
Mount Pleasant Township
Robinson Township

bcc: File (ESG00007170003)
Dana Drake, P.E., Program Manager



CHECKLIST

The following items must be included in the resubmittal of your application or the submission of additional information.

Technical Deficiencies (E#-Erosion & Sediment; P#- PCSM)

- P1. §102.5(a): This permit will be reviewed as an individual Erosion and Sediment Control Permit. You should have already received comments from the Beaver County Conservation District, which is coordinating efforts for the review of the Erosion and Sediment portions of the project in Allegheny, Beaver and Washington Counties. The DEP will be coordinating with the county conservation districts to ensure that this permit meets the requirements of Chapter 102.
- P2. §102.8(b): Earthwork occurring in Chartiers Township, Mount Pleasant Township and Robinson Township, Washington County are proposed in locations with Act 167 plans approved after 2005. Provide a stormwater management analysis of any impacts on the Stormwater Management Plan that was prepared or adopted under the Stormwater Management Act (32 P. S. § § 680.1—680.17), along with a letter from Chartiers Township, Mount Pleasant Township and Robinson Township commenting on the analysis.
- P3. §102.8(g)(2): In order to show that the proposed infiltration basins minimize increases to the 2-year volume, provide NOI Worksheets 1 through 5.
- P4. §102.8(g)(2): Based on the submitted hydrologic model, the proposed detention basin captures less than 90% of the area which is not proposed to be restored. In order to ensure that your project is capable of maintaining water quality, submit NOI Worksheets 12 and 13 for all areas not directed through a PCSM BMP.
- P5. §102.8(d): Provide a Post-Construction Stormwater Management plan set, which is separate from the Erosion and Sediment Control plan set, and shows the proposed access road, meter site and infiltration basin, along with all appropriate notes and details.

Other comments:

1. Please note that comments will be accepted by the public until April 17, 2018. Additional deficiencies may be noted after that date based on public comments.
2. Review of this application will be coordinated with the three Joint Permit Applications for the Falcon Ethane Pipeline System project (E02-1773, E04-369, and E63-710)

Please note that the responses should be in the form of revisions to the original application. Any pages revised should bear the revision date. Please submit with a copy of this letter **3 copies of the revised E&S plans and 1 copy of the revised PCSM plan** to the District at: 156 Cowpath Road, Aliquippa, PA 15001 and the remaining **2 copies of the revised PCSM plan and 1 copy of the E&S plans** to the Department at: Waterways & Wetlands Program, 400 Waterfront Drive, Pittsburgh, PA 15222.