Silva, Rachel

From: Kreitz, Theodora L. <tkreitz@keller-engineers.com>

Sent: Friday, February 12, 2016 11:33 AM

To: Silva, Rachel

Cc: Betty Robertson (betty@blairtownship-pa.org); Ed Silvetti (silvetti@blairtownship-pa.org);

Piper, Benjamin S.

Subject: Sunoco Pipeline LP - PA pipeline project

Follow Up Flag: Follow up Flag Status: Flagged

Rachel,

In response to your 2/8/16 letter to Blair Township, Blair County, PA requesting consistency letters regarding floodplain and stormwater management, I can let you know that the Township is able to issue a consistency letter regarding floodplain management. You should expect to receive a formal letter from the township in the next few days indicating floodplain consistency.

However, insufficient information was provided to the township to determine consistency with Blair Township's stormwater management regulations. You may be aware that the township has been in contact with Sunoco officials regarding the use of a particular township road as a construction access. During these conversations and meetings, Sunoco also explained the planned block valve station that will be installed along the pipeline route within the township. From the description offered of the block valve station it appears that a stormwater management plan might be required to be submitted for review and approval. The township's stormwater regulations are found in Blair Township Stormwater Management Ordinance No. 2011-08. Section 105 of the ordinance states:

"Any activity by a subdivider or developer, corporation, or other entity involving any surface changes in excess of 5,000 square feet shall be required to prepare and submit a stormwater management plan in conformance with these regulations for review and acceptance by the township engineer."

You can find the ordinance on the township's web page:

<u>http://www.blairco.org/BlairTwp/Pages/BlairTownshipOrdinances.aspx</u>, scroll to the bottom of the page for a link to the pdf file of this ordinance.

The Nov. 10, 2015 submission to the township did not contain sufficient detail to determine if the 5,000 sq. ft. threshold would be exceeded. It has been the general practice of the township to consider the surface changes of vegetative cover changed to impervious surface in this determination. From the description of the valve station offered by the Sunoco representative to the township, the valve station involves a concrete pad, roof top and access driveway, all of which would be considered a change in surface cover from the existing wooded hillside where the facility is presently proposed.

The township has also expressed concern to Sunoco about the proposed location of this valve facility. From information presented by Sunoco at a January 12, 2016 meeting, the valve station location at the end of Hamer Drive appeared to be depicted somewhat differently than what was presented in your Nov. 10, 2015 submission (see Sheets 15 & 16 of 321).

I believe the township will be sending you a formal response requesting additional information regarding the stormwater management consistency requirements. If you can submit plans which show that the 5,000 sq. ft. threshold will not be exceeded, then a stormwater consistency letter can be issued. Otherwise I believe the township will require the submission of a stormwater management plan.

Teddie Kreitz, CPESC, CFM **Keller Engineers, Inc.** PO Box 61 Hollidaysburg, PA 16648 814-696-7430 814-696-0150 FAX

www.Keller-Engineers.com



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