



October 27, 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 email from Chris Smith, dated October 5, 2020, in which PADEP requested the follow items to continue the technical review for Phase 2B.

The resubmission includes the following revised documents:

- Adelpia Gateway Project, Erosion and Sediment Control Plan and Post Construction Stormwater Management Plan, Tilghman Lateral -Phase 2B, dated 10/27/2020
- NOI Checklist
- Copy of \$925 Check to Delaware County Conservation District
- Copy of \$2,400 Check to PADEP

The following are our responses to comments:

Additional Requested Items:

1. **PADEP Comment (10/5/20):** The applicant should send the Conservation District fee to the Delaware County Conservation District (DCCD), 1521 N Providence Rd, Media, PA 19063 (ATTN: Ed Magargee).

JMT Response (10/27/20): A Conservation District fee of \$925.00 will be sent to DCCD with a hard copy of revised plans. A copy of the check is included in this submission for your reference.

2. **PADEP Comment (10/5/20):** For Item 2, the applicant should send the DEP disturbed acre fee to the DEP Southeast Regional Office, 2 East Main Street, Norristown, PA 19401 (ATTN: Aaron Redmond). (\$100/Acre of earth disturbance payable to the "Commonwealth of PA Clean Water Fund") Also, please update the DEP NOI Checklist and DEP NOI for this requested increase in earth disturbance.

JMT Response (10/27/20): A DEP disturbance acre fee of \$2,400.00 was sent to PADEP on October 8, 2020. A copy of the check is included in this submission for your reference. The increase in earth disturbance was updated on the previously submitted NOI. Refer to Page 4 and 5 of the NOI. The NOI Checklist was updated on Page 3 to note that the Permit NOI Filing Fee is included.

- 3.

(A) PADEP Comment (10/5/20): The applicant should amend the E&S/Site Restoration plan

drawings to identify/label and delineate the proposed temporary parking, material laydown areas, and stockpiling areas. Please add adequate erosion and sedimentation (E&S) BMPs for these temporary earth disturbance activities.

JMT Response (10/27/20): *The E&S/Site Restoration plan drawings have been updated to delineate the LOD based on their respective proposed use of workspace: parking area, drilling equipment area for HDD, material storage area and HDD pipe stringing area. The table on SR-5 and PCSM-3 have been updated to further outline the workspace use per LOD area.*

E&S BMPs have been added to the temporary earth disturbance activities, i.e. inlet protection, rock construction entrances (with wash racks, if in siltation impaired watershed), rumble pad construction entrance, compost filter socks, concrete washouts, stockpiles, erosion control blanketing, temporary cofferdam and pump bypass and pumped water filter bags, and concrete washouts.

- (B) PADEP Comment (10/5/20):** Please verify that the sequence of construction includes the install, operation/maintenance, and removal of these temporary earth disturbance activities and the associated E&S BMPs. In addition, please verify that the construction details and specifications for these areas and associated BMPs have been added to the plan drawing set. Please verify that the Site Restoration BMPs for these earth disturbance areas have been added to the E&S/Site Restoration plan drawings.

JMT Response (10/27/20): *JMT has confirmed that the construction sequence includes the install, operation/maintenance, and removal of these temporary earth disturbance activities and the associated E&S BMPs. Construction details for each E&S BMP are on SR-7 and SR-8 and further detail the required maintenance activities for the E&S BMPs.*

- (C) PADEP Comment (10/5/20):** The applicant will need to address all of the Chapter 102 regulations for these new earth disturbance areas, particularly 102.4(b)(4) "Unless otherwise authorized by the Department or conservation district after consultation with the Department, earth disturbance activities shall be planned and implemented to the extent practicable in accordance with the following: (i) Minimize the extent and duration of the earth disturbance..."

JMT Response (10/27/20): *Outlined below is how the earth disturbance activities are planned in accordance with the following:*

- (i) Minimize the extent and duration of the earth disturbance:** *The LOD will be minimized to the maximum extent possible while also promoting safe distancing and maneuvering around the project area. The project provides 0.6 miles of open cut trench and 3.8 miles of horizontal directional drilling (HDD). The use of HDD minimizes the surface disturbance along the length of the pipeline rather the disturbance is concentrated at the drill entry and exit. While included in the limit of disturbance, much of the area is not intended to disturb the subbase unless damaged. The construction team is estimating that one month will be required at each drill point, with earth disturbance lasting 7 months in duration for the project.*
- (ii) Maximize protection of existing drainage features and vegetation:** *It is specified on the plans that the contractor shall match existing topography to maintain drainage features. The design plans also indicate that all existing vegetation shall be restored as specified on the Site Restoration Schedule on SR-4. Note that the depth of the proposed pipe alignment is approximately 20-30' below grade where it should not impact existing utilities. In addition, sediment control best management practices are employed to limit sediment entry the waterways.*
- (iii) Minimize soil compaction:** *Soil compaction will be minimized by protecting disturbed soils areas from excessive compaction during construction, minimizing large cleared areas, and stockpiling of topsoil. The Site Restoration Schedule on SR-4 notes that all disturbed areas*

containing existing vegetative cover shall be decompacted to subgrade to a depth of 12 inches.

- (iv) **Utilize other measures or controls that prevent or minimize the generation of increased stormwater runoff.:** *Except for the PECO Meter Station, the limit of disturbance will be restored to existing conditions. At the PECO Meter Station, two dry wells are proposed due to an increase in stormwater runoff rate and volume. The remaining LOD will be restored to existing conditions, which will not result in a net increase of stormwater runoff rate and volume.*

Please note that these are also noted on plan sheets SR-2 and PCSM-3.

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
Water Resources

AH/sm

Enclosures

Cc: Keith Edmonds, NJR
Andrew Westhoven, NJR
Willie Keterson, HGA
Ed Magargee, Delaware County Conservation District