



November 20, 2020

Mr. Mark Valori
Adelphia Gateway, LLC
1415 Wyckoff Road
Wall, NJ 07719

Re: Technical Deficiency Letter
Adelphia Gateway Project - Phase 2B
ESCGP-3 Permit Application No. ESG 01 00 19 001
Municipality: Lower Chichester Township, Trainer Borough, and City of Chester
County: Delaware County

Dear Mr. Valori:

The Department of Environmental Protection (DEP) and the Delaware County Conservation District (DCCD) have reviewed the above referenced ESCGP-3 permit application and have identified the technical deficiencies listed below. The *Pennsylvania Erosion and Sediment Pollution Control Program Manual* (E&S Manual) and the *Pennsylvania Stormwater Best Management Practices Manual* (BMP Manual) include information that may 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 DEP's established means of satisfying the applicable regulatory and statutory requirements.

Technical Deficiencies from DCCD

1. ABACT Controls (Marcus Hook Creek). Chapter 102.11 (a) (1)
 - a. Pump water filter bag needs to be surrounded by compost filter sock to be considered an ABACT.
 - b. Inlet protection – unsure the drainage area. So, whether or not the ½ acre drainage area limit off site bag has been exceeded.
2. Legend – Chapter 102.11 (a) (1)
 - a. The symbol used for 12” CFS is the same as 24” CFS.
 - b. Sheet SR-13 through SR-15 – why is the color blue (symbol) shown for drilling equipment area? When no exit or entry points are proposed?

Technical Deficiencies from DEP

1. With this resubmission by Adelphia Gateway, it is understood that Adelphia Gateway is requesting to increase their earth disturbance activities for this phase (Phase 2B) from 1.3 acres as initially submitted for the above referenced application to 24.76 acres. Also, with this resubmission, it is understood that the applicant is changing their Post Construction Stormwater Management (PCSM) design at the PECO meter station from a capture and reuse BMP to an infiltration BMP using dry wells.
2. Please confirm and demonstrate that the PNDI receipt/clearances, the Act 14 notifications, and the PHMC coordination includes the increase in the earth disturbance from 1.3 acre to 24.76 acres. If these items do not include the increase in the earth disturbance, please coordinate with each of these entities and provide updated correspondence documentation. [NOI/Application Checklist]
3. It is noted in the PCSM report that the stormwater runoff from the PECO meter station site will be in the form of sheet flow. It seems from the proposed features and design at the site that the runoff will be in the form of shallow concentrated or channel flow from the dry well discharge points. Please verify. Also, please identify all properties and property owners that will or may receive off-site stormwater discharges from the project site until discharges reach surface waters. This includes Municipality and PennDOT rights-of-way. Further, please verify that the off-site discharge analysis follows the Chapter 102 Off-site Discharges of Stormwater to Non-Surface Waters FAQ. [102.4; 102.8]
4. Please verify the numbers in DEP Worksheet 12 in the PCSM Report for the proposed conditions at the PECO meter station. It seems that the cover (in acres) does not add up to the Total Site Area (in acres) as listed on the same DEP Worksheet. The same numbers are presented in Section H.f of the ESCGP-3 NOI as well. [102.8]
5. Please add labels and outlines to the E&S/Site Restoration Plan Drawings to identify the areas of any Chapter 105 application that is currently under review by DEP (or any Chapter 105 authorization that the applicant has already received). [102.5]
6. For clarification with the areas of site restoration, please label the five new concrete pads at the PECO meter station site on the PCSM plan drawings and the E&S/Site Restoration plan drawings. [102.8]
7. When comparing the surface areas of the proposed buildings and the dry wells at the PECO meter station, it seems that dry well #1 has a greater loading ratio than the maximum recommended loading ratio presented in Appendix C of the PA BMP Manual. Please increase the surface area of the dry well to follow the PA BMP Manual loading ratio recommendation, or if the surface area of the dry well cannot be

increased, please justify the larger loading ratio along with a recommendation from the geotechnical engineer and please increase the factor of safety associated with the infiltration rates to a number higher than 2. [PA BMP Manual]

8. Please add the infiltration test locations and the soil evaluation (test pit) locations to the PSCM plan drawings and the E&S/Site Restoration plan drawings. [102.8]
9. For the PECO meter station site, please have your team's geotechnical engineer discuss in the Geotechnical Engineering Report the location (horizontal and vertical) of the soil evaluation (test pits) and infiltration tests with respect to the proposed dry well locations (horizontal and vertical). In the Geotechnical Engineering Report, the geotechnical engineer should state that the soil evaluation (test pits) and infiltration tests can be used or should not be used for the location (horizontal and vertical) of the proposed dry wells. [PA BMP Manual]
10. For the PECO meter station site, please verify the calculation of the proposed building area runoff and the infiltration volume using the infiltration rates with the factor of safety and the 72-hour drawdown time after the design storm. Since it seems that the dry wells are being proposed for volume management and peak rate attenuation, the design storm should include 2-year/24-hour storm event through the 100-year/24-hour storm event. The stormwater model is difficult to see the volume managed or discarded. A separate calculation may be needed to demonstrate the infiltrated runoff volume. [102.8; PA BMP Manual]
11. Please verify the Summary Table in Section H.e of the ESCGP-3 NOI for the PECO meter station, particularly the Impervious areas (in acres) and the Net Change in Volume of stormwater runoff (acre-ft) with planned stormwater BMPs. It seems that there are pre-construction and post-construction impervious areas at the PECO meter station, and it seems that the net change in Volume with planned stormwater BMPs is typically 0.00 or negative (not positive), if not, please provide justification. [NOI/Application]
12. For the PECO meter station site, please have your team's geotechnical engineer recommend the use of the soil evaluation and infiltration rates as presented in the Geotechnical Engineering Report for the infiltration BMPs (dry wells) for all storms up to and including the 100-year/24-hour storm event based on the proposed contributory drainage areas and the surface areas of the infiltration BMPs. [102.8; PA BMP Manual]
13. The PCSM plan drawings do not reflect a green roof for either of the proposed buildings at the PECO meter station. The Geotechnical Engineering Report references a green roof for each proposed building. For consistency reasons, please correct either

the PCSM Plan drawings or the Geotechnical Engineering Report to specify the proposed type of roof at each proposed building. [102.8]

14. The Geotechnical Engineering Report states, "...the groundwater data was collected in late July during the dry season, and the seasonally high groundwater table may be higher in the springtime. Given water seepage was noted at the bottom of Test Pit TP-1, depending on the seasonally high groundwater table in the Spring, dry wells may not be feasible in this location, or the bottom elevations of the dry wells should be limited to a depth that is 2 feet higher than the seasonally high groundwater table. The seasonally high groundwater table depth in this location should be investigated." For the PECO meter station site, please provide more information about the seasonally high groundwater table depth based on this recommendation in the Geotechnical Engineering Report in regards to the two proposed dry wells. [PA BMP Manual]

You must submit a response fully addressing each of the technical deficiencies set forth above. Please note that this information must be received within 30 calendar days from the date of this letter, on or before December 20, 2020, or DEP may deny the ESCGP-3 permit application.

Please submit 1 hard copy and 1 CD-ROM of the revised information to the Delaware County Conservation District, 1521 N Providence Rd, Media, PA 19063, and 1 electronic copy of the revised information to DEP at the DEP FTP Site.

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.

If you have questions about your application, please contact me by e-mail at christopsm@pa.gov or by telephone at 484-250-5152 and refer to Application No. ESG 01 00 19 001 (Phase 2B) to discuss your concerns or to schedule a meeting. You must attempt to schedule any meeting within the 30 calendar days allotted for your reply.

Sincerely,

Christopher Smith

Christopher Smith, P.E.
Chief, Construction Permits Section
Waterways and Wetlands Program

cc: Ms. Shiny Mathew – Johnson, Mirmiran & Thompson (JMT)
Mr. Magargee - Delaware County Conservation District
Municipal Engineer - Lower Chichester Township
Municipal Engineer – Trainer Borough
Municipal Engineer – City of Chester
Mr. Smith
Mr. Hohenstein
Mr. Shankar
Mr. Rocco
Ms. Yordy
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