



September 25, 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 Adelphia Gateway Project – Phase 2B, dated August 28, 2020.

The resubmission includes the following revised documents:

- Notice of Intent for ESCGP-3 for Adelphia Gateway Project- Tilghman Lateral Phase 2B, signed and notarized, with completed Checklist
- Adelphia Gateway Project, Erosion and Sediment Control Plan and Post Construction Stormwater Management Plan, Tilghman Lateral -Phase 2B, dated 09/25/2020
- Erosion and Sediment Control Report, dated September 2020
- Post Construction Stormwater Report, dated September 2020

Please note that with the resubmission of these documents, the limit of disturbance has increased to 24.76 acres. While the limits of open cut trenching remains 1.3 acres and the majority of the main is to be installed using HDD minimizing surface disturbance, the remaining area included in the LOD is temporary workspace anticipated to be used for parking, material laydown areas, and stockpiling. In addition, the increased area is promote safe distancing and maneuvering around the project area.

The following are our responses to comments:

Technical Deficiencies:

1. **PADEP Comment (8/28/20):** The specification for straw mulch stabilization could not be located, or wood cellulose mulch specifications for areas stabilized with hydro-seeding. [Chapter 102.11 (a) (1)]

JMT Response (9/25/20): *Mulch specifications have been added to PCSM-2 and SR-4.*

2. **PADEP Comment (8/28/20):** Sheet SR-23 – disturbed areas on both sides of Stoney Creek yet no erosion control shown on erosion control matting. [Chapter 102.11 (a) (1)]

JMT Response (9/25/20): *Erosion control matting has been added to the disturbed areas on both sides of Stoney Creek. Please note this is now on Sheet SR-25.*

3. **PADEP Comment (8/28/20):** Sheet SR-34 – maybe close to the Wade Dump Capped Super Fund

site. Have the limits of contamination been identified in this area? [Chapter 102.11 (a) (1)]

JMT Response (9/25/20): *The limits of the Wade Dump Capped Super Fund site is located the West of the PECO Meter Station and is not within the project limit. Please note the PECO site is now shown on Sheet SR-37 and SR-38.*

Long-term groundwater monitoring had been conducted since remediation was completed. In the most recent 5-year site review (December 2018), PADEP determined that human exposure and groundwater migration risks were under control; 9 of the 13 wells were non-detect for all compounds and although low levels of some VOCs (predominantly benzene) were still detected in the other 4 wells, the levels were very low and no drinking water wells can be installed in the vicinity, so the risk to human health is negligible.

Following the 2018 review, the EPA determined that the site is protective and authorized PADEP to discontinue the groundwater monitoring program. At this time, no additional remediation or groundwater monitoring is required for this site.

4. **PADEP Comment (8/28/20):** 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 (9/25/20): *A note has been added to SR-2, General Note #68, to indicate that excavated material shall not be stockpiled within the roadway and shall be stockpiled beyond the edge of pavement or curbline.*

5. **PADEP Comment (8/28/20):** At a minimum, the E & S plan should address the separate documents for directional drilling and inadvertent release contingency plans. [Chapter 102.11 (a) (1)]. Note: They were not included with this submission.

JMT Response (9/25/20): *References for the Inadvertent Release Contingency and HDD Design and Constructability Review Report have been added to the Cover Sheet under Reference Documents. General Note #69 on SR-2 was added to indicate that the contractor shall follow the procedures note in the Inadvertent Release Contingency, which notes E&S device guidelines.*

6. **PADEP Comment (8/28/20):** Sequence of Construction should address removal of erosion and sediment control devices once the site is stabilized. [Chapter 102.11 (a) (1)]

JMT Response (9/25/20): *Construction Sequence on PCSM-3 and SR-3 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.*

7. **PADEP Comment (8/28/20):** The titles of the plan drawings SR-8 through SR-35 should be amended to include "Site Restoration Plan." [Chapter 102.8 (f)]

JMT Response (9/25/20): *The titles of all plan drawings have been revised to match the Title Sheet.*

8. **PADEP Comment (8/28/20):** For the PECO Meter Station, it is understood that there are two (2) new buildings to be constructed and five (5) new concrete pads. To manage the increase in runoff volume, water quality, and peak rate for these new impervious surfaces, the applicant is proposing two (2) green roofs and three (3) rain barrels at this site. In the PCSM Report, it is noted that the rain barrels will function as a Capture and Reuse BMP. It is further noted that the rainwater collected in these rain barrels (collected and conveyed from the green roofs) will be reused for dust control measures throughout the site. Typically, in order to take credit for a Capture and Reuse BMP, the applicant's

team needs to demonstrate the demand or water need for the collected rainwater on an annual basis. Please provide a demonstration for this water need or demand in dust control measure throughout the site. Typically, as referenced in the PA BMP Manual, the demonstration includes a schedule and a water budget for reusing the collected rainwater based on the forecasted need, demand, and/or usage. This schedule for this demand in dust control measures should be added to the Long-term Operation and Maintenance Plan for the PCSM Plan for this site. Further, regarding the five concrete pads, it seems that the applicant's team has decided that these concrete pads will not cause a rainwater runoff discharge point from the site. Please provide reasoning for this decision. In addition, please consider an adequate conveyance path for the bypass or overflow of larger storm events of the rain barrels as referenced in the PA BMP Manual. Chapter 102.8(f)

JMT Response (9/25/20): *JMT has revised the PCSM design to include two dry wells (BMP 6.4.6). Based on infiltration testing, these locations were deemed favorable for infiltration. All submission documents reflect this updated design element. A conveyance path for the overflow from the two dry wells are provided as part of an off-site channel analysis. Please refer to Section XV in the PCSM Report, Section XII in the E&S Report and Plan Sheets PCSM-6 to PCSM-8 and SR-39 to SR-41.*

Note the 5 concrete pads are included in the 2 yr volume analysis, see PCSM report, Appendix D. While these area not captured and managed by a BMP, the structural volume provided by the proposed dry wells is greater than the structural volume required thereby achieving the volume control requirements.

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.
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AH/sm
Enclosures

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