



March 25, 2021

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

Re: Technical Deficiency Letter  
Adelphia Gateway Project - Phase 1  
Major Permit Amendment application  
ESCGP-3 Permit Application No. ESG 01 00 19 001 A-1  
Municipalities: Richland Township, West Rockhill Township, East Pikeland  
Township, East Whiteland Township, Thornbury Township, Lower Chichester  
Township, Skippack Township  
Counties: Bucks, Chester, Delaware, and Montgomery Counties

Dear Mr. Valori:

The Department of Environmental Protection (DEP), the Bucks County Conservation District (BCCD), the Chester County Conservation District (CCCD), the Delaware County Conservation District (DCCD), and the Montgomery County Conservation District (MCCD) 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.

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### Technical Deficiencies

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#### Technical Deficiencies from BCCD

1. The revised limit of disturbance for the temporary workspace to the east of the compressor station includes areas previously delineated as wetlands. An updated wetland delineation report was not provided. Please provide additional information justifying the change in wetland boundaries at the site.

Technical Deficiencies from CCCD

CCCD is in receipt of the Adelpia Pipeline Major Modification Plans sheets and revision dates as follows: T1- 1/22/21; ES 15- 11/25/20; ES 16 & ES 17- 1/22/21; ES 18 to ES 20- 11/25/20 and offer the following comments:

- 1.) ES sheets 16 & 17 and 18 & 19 illustrate long access lanes that appear to be over existing grades. Please identify the existing ground cover of the proposed access lane and provide appropriate E&S controls to address any earth disturbance construction equipment and contractor access will create including perimeter controls, rock construction entrances, etc. 102.11(a)(1)
- 2.) Site Inset Map on Sheet ES 17 shows mats overtop of the perimeter controls. Please revise plans to ensure E&S perimeter controls can be properly installed without conflict from other site work. 102.11(a)(1)
- 3.) Please include E&S Detail and Note sheets, Construction Sequencing and Site Restoration note and detail sheets with the Chester County portion of the plan mapping. 102.11(a)(1)
- 4.) Please verify that perimeter controls are proposed on all downslope sides of disturbance at the Schuylkill River Blow Down. It appears perimeter controls are missing adjacent to the wetlands. The CCCD requests a minimum of 24" filter sock adjacent to streams and wetlands. 102.11(a)(1) and 102.4(c)

Technical Deficiencies from DCCD

No deficiencies at this time.

Technical Deficiencies from MCCD

No deficiencies noted at this time.

Technical Deficiencies from DEP

1. Please provide clearance letters from each of the PNDI agencies and the PHMC for the above referenced ESCGP-3 permit application. If your team receives recommendations from any of the PNDI agencies and/or the PHMC in the form of conservation measures, avoidance measures, etc., please provide a demonstration for how your team will be addressing the recommendations with any cross references to the plan drawings.

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 March 25, 2021, or DEP may deny the ESCGP-3 permit application.

Please submit 1 hard copy and 1 CD-ROM of the revised information to each of the County Conservation Districts (Bucks County Conservation District, 1456 Ferry Rd # 704, Doylestown, PA 18901; Chester County Conservation District, 688 Unionville Rd # 200, Kennett Square, PA 19348; Delaware County Conservation District, 1521 N Providence Rd, Media, PA 19063; Montgomery County Conservation District, 143 Level Rd, Collegeville, PA 19426), and please upload one electronic copy of the revised information to DEP through 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 A-1 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)  
Bucks County Conservation District  
Chester County Conservation District  
Delaware County Conservation District  
Montgomery County Conservation District  
Mr. Smith  
Mr. Hohenstein  
Re 30