



PITT-06-21-001

June 1, 2021

Mr. Christopher Smith  
Pennsylvania Department of Environmental Protection  
Waterways and Wetlands Program  
Southeast Regional Office  
2 East Main Street  
Norristown, Pennsylvania 19401

**Re: Sunoco Pipeline LP – Pennsylvania Pipeline Project (Mariner East II)  
Chapter 102 Permit No. ESG0100015001– Major Amendment  
HDD S3-0290 Installation Method Change and Additional Temporary Workspace  
Upper Uwchlan Township, Chester County, PA  
Response to Technical Deficiency Letter**

Dear Mr. Smith:

On behalf of Sunoco Pipeline LP (SPLP), Tetra Tech, Inc. provides the following responses to the Pennsylvania Department of Environmental Protection (Department) Technical Deficiency letter dated May 25, 2021, regarding the above-referenced Chapter 102 ESCGP-3 Major Amendment. The supporting attachments represent additional information to be added to the original amendment request. For ease of your review, the Department's comment is set forth verbatim below, followed by a narrative response with supporting attachment.

**Comments and Responses to May 25, 2021 Technical Deficiencies:**

1. **Comment:** Please utilize a minimum of 24" Filter Sock adjacent to streams and wetlands. See adjacent to wetland H60, WL H17, etc. Check entire Major Mod plan and revise as needed. 102.4(C)

*Response: Drawing ES-6.29 has been update accordingly. ES-6.29 is the only sheet in the amendment area containing resources. Updated E&S Drawings are provided as Attachment A.*

2. **Comment:** Perimeter Filter sock BMPs should be designed for the maximum slope tributary to them, not just the LOD, please revise plans accordingly. 102.11(a)(1)

*Response: The E&S sheets were checked and compost filter sock size increased where applicable. Access from south will be matted or slope pipe diversion will be installed to address the drainage area in that location. Updated E&S Drawings are provided as Attachment A.*

3. **Comment:** Please clearly illustrate the stream crossing including the method of stream diversion on the plan mapping and provide a blow up of the stream crossing bypass system. 102.11(a)(1)

*Response: Drawing ES-6.29 has been updated to include a blow up insert of the proposed dam and pump bypass to be implemented for the open trench installation across stream S-H10. Updated E&S Drawings are provided as Attachment A.*

Mr. Christopher Smith  
Pennsylvania Department of Environmental Protection  
June 1, 2021

4. **Comment:** Please provide E&S Controls along the LOD adjacent to the existing house and driveway at station 14806+00. 102.11(a)(1)

*Response: Drawing ES-6.28 has been updated to provide 12-inch compost filter sock (CFS) along driveway and along LOD near the house. Updated E&S Drawings are provided as Attachment A.*

5. **Comment:** There is off road LOD shown on the North East corner of the intersection of Milford and Little Conestoga Road, please provide E&S controls at this location. 102.11(a)(1)

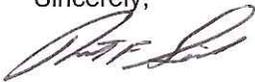
*Response: Drawing ES-6.28 has been updated to show CFS in this area. Updated E&S Drawings are provided as Attachment A.*

6. **Comment:** 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.

*Response: SPLP provided the PHMC clearance to the Department in an e-mail on May 6, 2021. SPLP also provided an initial clearance letter from the PFBC to the Department in an e-mail on April 19, 2021. However, due to the sighting of the Northern Red-bellied Cooter turtle north of the project area, new information was provided to the PFBC on May 5, 2021. The PFBC provided a conditioned clearance letter dated May 21, 2021 outlining special protections for the turtle. That letter is provided as Attachment B. Those protections and special conditions are provided as Note 6 and the location of the required exclusion fencing shown on the redline E&S Sheet ES-6.29. The legend on ES-0.01 has been updated to include the symbol for exclusion fence (---EF---EF---). Updated E&S Drawings are provided as Attachment A. The USFWS was first coordinated with on March 19, 2021. On May 27, 2021, SPLP sent additional information to the USFWS regarding the bog turtle. The USFWS clearance is pending.*

This response letter is being provided electronically via email and a 2<sup>nd</sup> review fee of \$750.00 provided to the Chester County Conservation District. SPLP appreciates your review and comments and should you have questions regarding this correspondence, please do not hesitate to contact me at 412-921-8163 or via e-mail at Robert.Simcik@tetratech.com.

Sincerely,



Robert F. Simcik, P.E.  
Project Manager  
Tetra Tech, Inc.

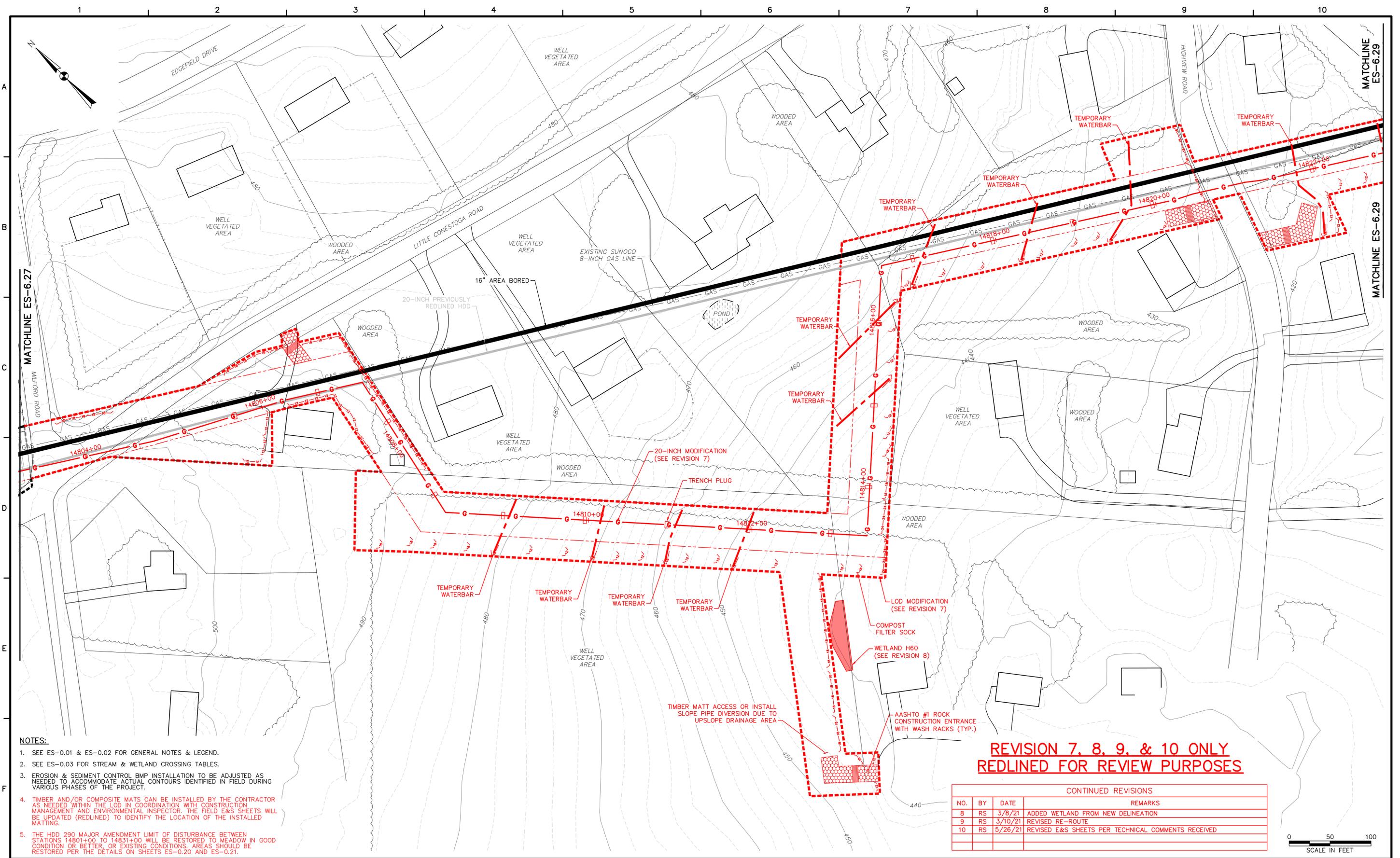
RFS/clm

Enclosures: Application

cc: File 212IC-BF-00037  
J. Hohenstein, PADEP SERO  
J. Sofranko, Chester CCD  
N. Bryan, Energy Transfer  
M. Styles, Energy Transfer  
C. Embry, Energy Transfer  
B. Schaeffer, Tetra Tech

## **Attachment A**





- NOTES:**
- SEE ES-0.01 & ES-0.02 FOR GENERAL NOTES & LEGEND.
  - SEE ES-0.03 FOR STREAM & WETLAND CROSSING TABLES.
  - EROSION & SEDIMENT CONTROL BMP INSTALLATION TO BE ADJUSTED AS NEEDED TO ACCOMMODATE ACTUAL CONTOURS IDENTIFIED IN FIELD DURING VARIOUS PHASES OF THE PROJECT.
  - TIMBER AND/OR COMPOSITE MATS CAN BE INSTALLED BY THE CONTRACTOR AS NEEDED WITHIN THE LOD IN COORDINATION WITH CONSTRUCTION MANAGEMENT AND ENVIRONMENTAL INSPECTOR. THE FIELD E&S SHEETS WILL BE UPDATED (REDLINED) TO IDENTIFY THE LOCATION OF THE INSTALLED MATTING.
  - THE HDD 290 MAJOR AMENDMENT LIMIT OF DISTURBANCE BETWEEN STATIONS 14801+00 TO 14831+00 WILL BE RESTORED TO MEADOW IN GOOD CONDITION OR BETTER, OR EXISTING CONDITIONS. AREAS SHOULD BE RESTORED PER THE DETAILS ON SHEETS ES-0.20 AND ES-0.21.

**REVISION 7, 8, 9, & 10 ONLY  
REDLINED FOR REVIEW PURPOSES**

CONTINUED REVISIONS			
NO.	BY	DATE	REMARKS
8	RS	3/8/21	ADDED WETLAND FROM NEW DELINEATION
9	RS	3/10/21	REVISED RE-ROUTE
10	RS	5/26/21	REVISED E&S SHEETS PER TECHNICAL COMMENTS RECEIVED

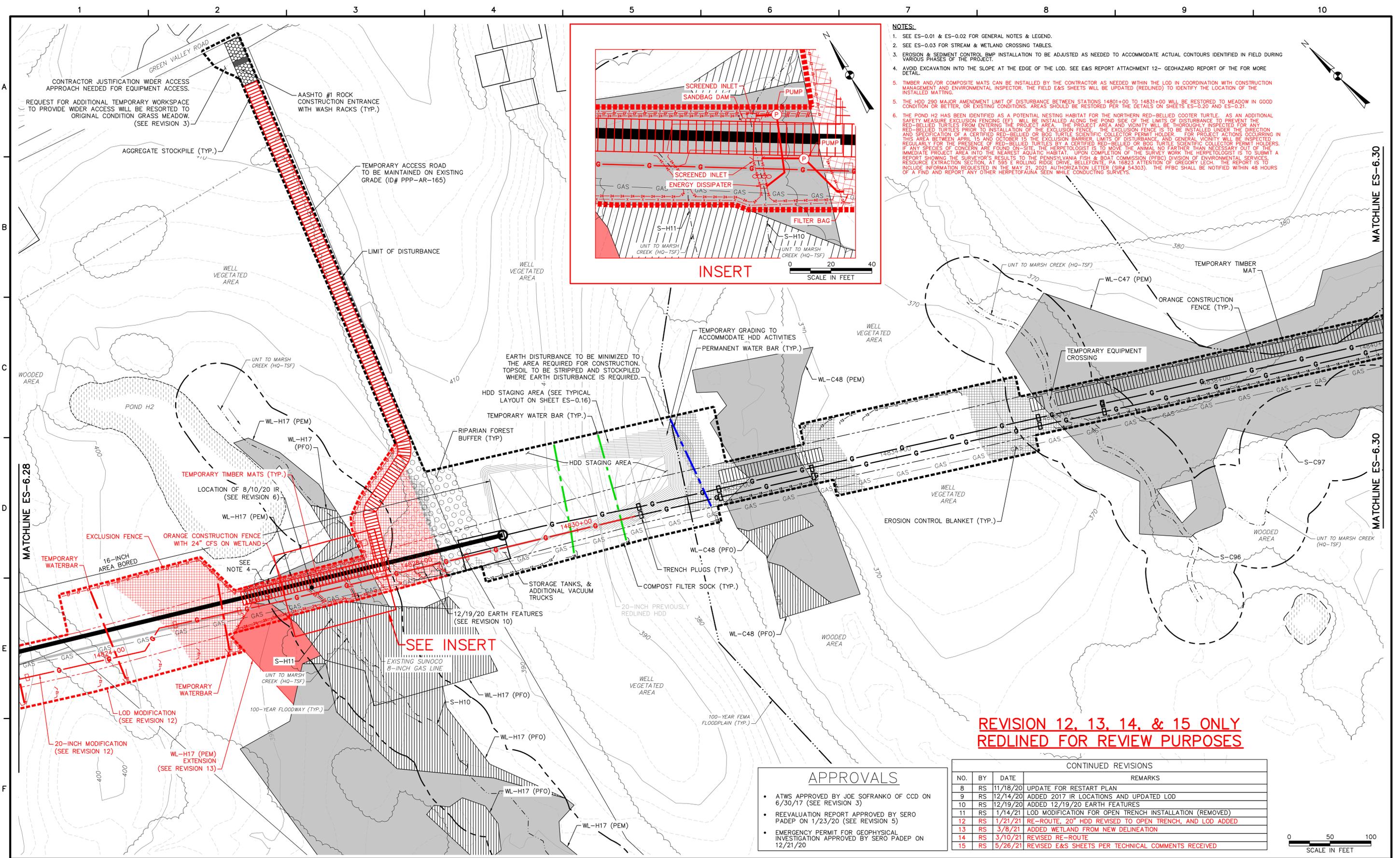


REVISIONS			
NO.	BY	DATE	REMARKS
1	RS	3/28/17	INCORPORATED THE SPECIAL CONDITIONS SET FORTH IN DEP'S CHAPTER 102 AND CHAPTER 105 PERMITS
2	RS	5/25/17	DRAWINGS PROVIDED TO FIELD
3	RS	6/26/18	CENTERLINE (16" AND 20" FLIPPED)
4	RS	6/5/19	PERM ROW EXTENDED FOR HDD
5	RS	7/17/19	20" HDD MODIFICATION
6	RS	1/14/21	LOD MODIFICATION FOR OPEN TRENCH INSTALLATION (REMOVED)
7	RS	1/21/21	RE-ROUTE, 20" HDD REMOVED, AND LOD MODIFICATION

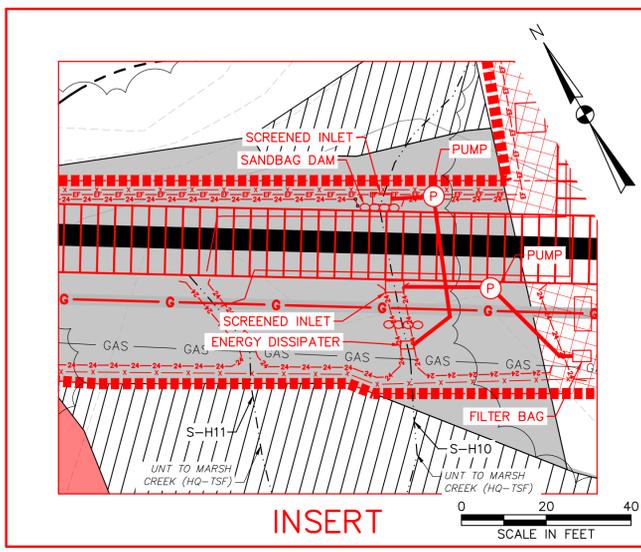
**SUNOCO PIPELINE LP  
SINKING SPRING, PENNSYLVANIA  
PENNSYLVANIA PIPELINE PROJECT  
CONSTRUCTION SPREAD 6**

**1-20" & 1-16" WELDED STEEL NATURAL GAS PIPELINES  
CHESTER COUNTY CONSERVATION DISTRICT  
EROSION & SEDIMENT CONTROL &  
SITE RESTORATION PLAN  
SHEET 28 OF 74**

DATE:	2/6/17
PROJECT NO.:	112C05958
DESIGNED BY:	JB
DRAWN BY:	BH
CHECKED BY:	RS
COPYRIGHT TETRA TECH INC.	
<b>ES-6.28</b>	
SHEET 6.28 OF 99	



- NOTES:**
- SEE ES-0.01 & ES-0.02 FOR GENERAL NOTES & LEGEND.
  - SEE ES-0.03 FOR STREAM & WETLAND CROSSING TABLES.
  - EROSION & SEDIMENT CONTROL BMP INSTALLATION TO BE ADJUSTED AS NEEDED TO ACCOMMODATE ACTUAL CONTOURS IDENTIFIED IN FIELD DURING VARIOUS PHASES OF THE PROJECT.
  - AVOID EXCAVATION INTO THE SLOPE AT THE EDGE OF THE LOD. SEE E&S REPORT ATTACHMENT 12- GEOHAZARD REPORT OF THE FOR MORE DETAIL.
  - TIMBER AND/OR COMPOSITE MATS CAN BE INSTALLED BY THE CONTRACTOR AS NEEDED WITHIN THE LOD IN COORDINATION WITH CONSTRUCTION MANAGEMENT AND ENVIRONMENTAL INSPECTOR. THE FIELD E&S SHEETS WILL BE UPDATED (REDLINED) TO IDENTIFY THE LOCATION OF THE INSTALLED MATTING.
  - THE HDD 290 MAJOR AMENDMENT LIMIT OF DISTURBANCE BETWEEN STATIONS 14801+00 TO 14831+00 WILL BE RESTORED TO MEADOW IN GOOD CONDITION OR BETTER, OR EXISTING CONDITIONS. AREAS SHOULD BE RESTORED PER THE DETAILS ON SHEETS ES-0.20 AND ES-0.21.
  - THE POND H2 HAS BEEN IDENTIFIED AS A POTENTIAL NESTING HABITAT FOR THE NORTHERN RED-BELLIED COOTER TURTLE. AS AN ADDITIONAL SAFETY MEASURE EXCLUSION FENCING (EF) WILL BE INSTALLED ALONG THE POND SIDE OF THE LIMITS OF DISTURBANCE TO PREVENT THE RED-BELLIED TURTLES FROM ENTERING THE PROJECT AREA. THE PROJECT AREA AND VICINITY WILL BE THOROUGHLY INSPECTED FOR ANY RED-BELLIED TURTLES PRIOR TO INSTALLATION OF THE EXCLUSION FENCE. THE EXCLUSION FENCE IS TO BE INSTALLED UNDER THE DIRECTION AND SPECIFICATION OF A CERTIFIED RED-BELLIED OR BOG TURTLE SCIENTIFIC COLLECTOR PERMIT HOLDER FOR PROJECT ACTIONS OCCURRING IN THIS AREA BETWEEN APRIL 15 AND OCTOBER 15. THE EXCLUSION BARRIER, LIMITS OF DISTURBANCE, AND GENERAL VICINITY WILL BE INSPECTED REGULARLY FOR THE PRESENCE OF RED-BELLIED TURTLES BY A CERTIFIED RED-BELLIED OR BOG TURTLE SCIENTIFIC COLLECTOR PERMIT HOLDERS. IF ANY SPECIES OF CONCERN ARE FOUND ON-SITE, THE HERPETOLOGIST IS TO MOVE THE ANIMAL NO FURTHER THAN NECESSARY OUT OF THE IMMEDIATE PROJECT AREA INTO THE NEAREST AQUATIC HABITAT. UPON COMPLETION OF THE SURVEY WORK, THE HERPETOLOGIST IS TO SUBMIT A REPORT SHOWING THE SURVEYOR'S RESULTS TO THE PENNSYLVANIA FISH & BOAT COMMISSION (PFBC) DIVISION OF ENVIRONMENTAL SERVICES, RESOURCE EXTRACTION SECTION, AT 595 E. ROLLING RIDGE DRIVE, BELLEFONTE, PA 16823 ATTENTION OF GREGORY LEICH. THE REPORT IS TO INCLUDE INFORMATION REQUESTED IN THE MAY 21, 2021 AUTHORIZATION LETTER (SIR# 54303). THE PFBC SHALL BE NOTIFIED WITHIN 48 HOURS OF A FIND AND REPORT ANY OTHER HERPETOFAUNA SEEN WHILE CONDUCTING SURVEYS.



**REVISION 12, 13, 14, & 15 ONLY  
REDLINED FOR REVIEW PURPOSES**

- APPROVALS**
- ATWS APPROVED BY JOE SOFRANKO OF CCD ON 6/30/17 (SEE REVISION 3)
  - REEVALUATION REPORT APPROVED BY SERO PADEP ON 1/23/20 (SEE REVISION 5)
  - EMERGENCY PERMIT FOR GEOPHYSICAL INVESTIGATION APPROVED BY SERO PADEP ON 12/21/20

CONTINUED REVISIONS			
NO.	BY	DATE	REMARKS
8	RS	11/18/20	UPDATE FOR RESTART PLAN
9	RS	12/14/20	ADDED 2017 IR LOCATIONS AND UPDATED LOD
10	RS	12/19/20	ADDED 12/19/20 EARTH FEATURES
11	RS	1/14/21	LOD MODIFICATION FOR OPEN TRENCH INSTALLATION (REMOVED)
12	RS	1/21/21	RE-ROUTE, 20" HDD REVISED TO OPEN TRENCH, AND LOD ADDED
13	RS	3/8/21	ADDED WETLAND FROM NEW DELINEATION
14	RS	3/10/21	REVISED RE-ROUTE
15	RS	5/26/21	REVISED E&S SHEETS PER TECHNICAL COMMENTS RECEIVED

REVISIONS			
NO.	BY	DATE	REMARKS
1	RS	3/28/17	INCORPORATED THE SPECIAL CONDITIONS SET FORTH IN DEP'S CHAPTER 102 AND CHAPTER 105 PERMITS
2	RS	5/25/17	DRAWINGS PROVIDED TO FIELD
3	RS	6/28/17	ATWS ADDED
4	RS	6/26/18	CENTERLINE (16" AND 20" FLIPPED)
5	RS	7/17/19	20" HDD MODIFICATION
6	RS	8/11/20	LOD ADDED FOR IR REMOVED
7	RS	9/17/20	DRILLING FLUID TRANSFER LINE NOW USED AS GROUT TRANSFER LINE (PENDING)

**SUNOCO PIPELINE LP  
SINKING SPRING, PENNSYLVANIA  
PENNSYLVANIA PIPELINE PROJECT  
CONSTRUCTION SPREAD 6**

**1-20" & 1-16" WELDED STEEL NATURAL GAS PIPELINES  
CHESTER COUNTY CONSERVATION DISTRICT  
EROSION & SEDIMENT CONTROL &  
SITE RESTORATION PLAN  
SHEET 29 OF 74**

**TETRA TECH**  
www.tetrattech.com  
661 ANDERSEN DRIVE - FOSTER PLAZA 7  
PITTSBURGH, PA 15220  
T: (412) 921-7090 | F: (412) 921-4040

DATE:	2/6/17
PROJECT NO.:	112C05958
DESIGNED BY:	JB
DRAWN BY:	BH
CHECKED BY:	RS
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<b>ES-6.29</b>	
SHEET 6.29 OF 99	

## **Attachment B**



## Pennsylvania Fish & Boat Commission

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**Division of Environmental Services**  
Resource Extraction Section  
595 E Rolling Ridge Dr.  
Bellefonte, PA 16823

May 21, 2021

**IN REPLY REFER TO**  
SIR# 54303

Tetra Tech  
Kelsey Stoneberg  
301 Ellicott Street  
Buffalo, New York 14203

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species**  
**PNDI Search No. 728453\_1**  
**0290 Alt 4 Centerline HDD PPP**  
**CHESTER County: Upper Uwchlan Township**

Dear Kelsey Stoneberg:

This responds to your updated inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search “potential conflict” or a threatened and endangered species impact review. Y

### **Northern Red-bellied Cooter (*Pseudemys rubriventris*, PA threatened)**

Based on your updated submission, the species of concern was observed in vicinity of the project. Therefore, the project site may contain accessible potential nesting habitat for the Northern Red-bellied Cooter. As a result, you proposed the following measures:

“As a result of this observation, as an additional safety measure, SPLP will be installing exclusion fencing along the pond side of the limits of disturbance, to prevent red-bellied turtles from entering the Project area. The Project area and vicinity would be thoroughly inspected for any red-bellied turtles prior to exclusion fence installation.

The exclusion fence installation would be installed under the direction and specification of a certified red-bellied or bog turtle scientific collector permit holder. For Project actions occurring in this area between April 15 and ~~October 1~~ **[October 15]**, the exclusion barrier, limits of disturbance, and general vicinity will be inspected regularly for the presence of red-bellied turtles by certified red-bellied or bog turtle scientific collector permit holders.”

Additionally, we recommend if any species of concern are found on-site, the herpetologist is to move the animal no farther than necessary out of the immediate project area into the nearest aquatic habitat. Upon completion of the survey work, the herpetologist is to forward a report showing the surveyor’s results to

### **Our Mission:**

[www.fish.state.pa.us](http://www.fish.state.pa.us)

*To protect, conserve and enhance the Commonwealth’s aquatic resources and provide fishing and boating opportunities.*

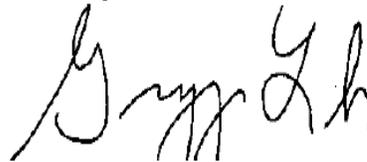
this office for our review and comment. Reports should include photographs and maps of appropriate suitable habitat. Threatened and endangered species observed in the survey should be photographed, aged, sexed, measured as to their size, and areas they were observed/captured should be mapped accordingly. Additionally, the PFBC must be contacted within 48 hours of the find. The surveyor should also report other herpetofauna seen while conducting the surveys.

**If the potential habitat areas can be fenced as recommended; the window is adjusted to October 15; and provided that best management practices are employed and strict erosion and sedimentation measures are maintained, we do not foresee any adverse impacts to Northern Red-bellied Cooter from the proposed project.**

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

**If you have any questions regarding this review, please contact Gregory Lech at 814-470-6776 and refer to the SIR # 54303.** Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,



Gregory Lech  
Resource Extraction Section

GPL/dn