

TO Matthew Gordon
Monica Styles
Sunoco Logistics, L.P.

FROM Domenic Rocco, P.E.
Regional Manager
Waterways and Wetlands
Southeast Region

DATE January 29, 2016

RE Pennsylvania Pipeline Project
Ch. 102 Application ESG No. 01000150001
Ch. 105 Application Nos. E15-862 and E23-524
Incompleteness Deficiency Response Review
Outstanding Deficiencies

MESSAGE:

Ch. 102 Application ESG No. 01000150001:

The Department of Environmental Protection (DEP) and the Chester and Delaware County Conservation Districts have reviewed the above-referenced application and have determined that it remains incomplete. The following list specifies the items that must be included in the resubmittal of your application and/or the submission of additional information. The Pennsylvania Erosion and Sediment Pollution Control Program Manual (E&S Manual) and the Pennsylvania Stormwater Best Management Practices Manual (PCSM Manual) include information that will aid you in responding to some of the items listed below. The items are based on applicable laws and regulations, and the guidance sets forth DEP's preferred means of satisfying the applicable regulatory requirements.

The deficiencies have been assembled from the County Conservation District and DEP staff. Many of the deficiencies identified are applicable to the entire project Sunoco Logistics, L.P., and their consultant team should review the entire project submittal to ensure that these items are addressed from a comprehensive standpoint.

Previous Comments which remain:

1. Comment No. 2 – Worksheet 1 could not be found within the Construction Spread dated December 2015. [102.4 & 102.11]
2. Comment No. 10 – The NOI, Section F still indicates 1,008 acres treated for the Exton Junction site. Please revise. [102.8]
3. Comment No. 15 – Tetra Tech response still indicates that all disturbed areas will be returned to meadow excluding existing and proposed impervious features. Portions of this project are going through residential areas where lawns exist; this should be addressed. Most landowners will not agree to allow their lawns to be converted to meadow. Additionally, it was found that in the Act 167 Stormwater Consistency Verification Report for Chester County past and present land uses are labeled as agricultural and forest land. Much of the ROW is through residential areas too and this should be properly addressed. [102.8]

New Comments – including comments resulting from newly submitted information:

4. As a general comment, we recommend the consultants for this project in their response letters cite specific locations within narratives and plan pages along with highlighting and/or tabbing narrative and plan pages where additional information has been provided or revisions were made. [102.4, 102.5 & 102.8]
5. In the E&S Narrative for the pump station (because it is a separate narrative), the reference is to a constructed filter on page 3-2 as a permanent control/filter but then it does not appear in the PCSM Narrative and it is not labeled on the drawings. [102.4]
6. In Section F, Question 3 of the Notice of Intent (NOI) for the Baldwin Run/Twin Oaks calculations, they have compost filter sock checked as a PCSM BMP, but I do not see any on the PCSM Plan, just on the E&S Plans. [102.4, 102.5 & 102.8]
7. Also on drawing/sheet 6, construction details are provided for Swales A and B but I can only locate Swale A on the plans. Also, calculations for the swale in the E&S narrative or the PCSM Narrative could not be found. [102.4, 102.5 & 102.8]
8. In the construction sequence installation for a 24" compost filter sock is listed to act as a sediment trap. A detail is provided for this trap on the drawings as well. However, the trap is not shown on the E&S Plans itself and no calculations are provided for the trap. [102.4]
9. A decrease in peak rate is reflected in the summary table for each block valve in the NOI for the ESCGP-2. It is uncertain how there is a decrease in peak rate from the 10 to

100-year storm events when there is an increase in impervious cover. Please expand the reasoning and/or justification in the PCSM Narrative. This should include references to the peak rate analyses and calculations. [102.8(g)]

10. Please update the PCSM Plan drawing for the basin associated with the Twin Oaks Pump Station to reflect that the basin is to function as an infiltration basin and a detention basin as described in the PCSM Narrative. Please complete Chart 5B for this infiltration/detention basin at the Twin Oaks Pump Station. A copy of Chart 5B is enclosed for your use. [102.8]
11. There is a concern with the proposed depth of the detention basin at the Twin Oaks Pump Station due to its close proximity to the unnamed tributary and adjacent wetlands. It seems that the detention basin bottom will be lower in elevation than the existing tributary and adjacent wetlands. The concern is that the water from the stream and wetlands has the potential to move laterally into the basin – this lateral movement could have an adverse impact on the unnamed tributary and adjacent wetlands. Please provide justification or engineering controls so that this lateral movement is prevented.
12. We did not receive Appendices C, D, or G which are referenced in the Twin Oaks Pump Station narrative.
13. Please include the following items for the Twin Oaks Pump Station [102.8(g)]:
 - a. Summary Table for the following:
 - i. volume management (pre vs. post-development increase in runoff volume from the 2-year/24-hour storm)
 - ii. water quality (pre vs. post-development increase in runoff volume from the 2-year/24-hour storm)
 - iii. peak rate control (pre vs. post-development 2 through 100-year/24-hour storm)
 - b. Worksheets 1–5, and 10 (including the soil amendments and the basin)
 - c. Runoff volume calculation from the 2-year/24-hour storm event to the basin
 - d. Infiltration test data and soil evaluation for the basin
 - e. Infiltration test locations and recommended infiltration rate (recommended by a licensed professional) on the PCSM Plan drawing

- f. Volume of infiltration based on the 2-year runoff volume to the basin and infiltration rate within 24–72 hours
14. A separate Worksheet 4 was found for each Block Valve area in Chester and Delaware Counties. It is difficult to verify these Worksheets (WS No. 4) without drainage areas for Worksheet 4 and the limits of the proposed gravel and the proposed meadow areas on the PCSM Plan drawings. Please add the drainage area for each block valve and the areas of the different cover types as hatching or shading. Each area on the PCSM Plan drawing should be labeled with their respective area in square feet. [102.8]
 15. The summary table on page 24 of the narrative does not include Site B for the Block Valve(s). Please update this summary table.
 16. The impervious areas listed in the summary tables in the NOI of the ESCGP-2 are not consistent with the gravel areas listed in the Worksheet 4 for the block valves. Please correct so that these are consistent.
 17. Please update the PCSM Plan drawings for the proposed infiltration berms at the Block Valves with the following [102.8(g)]:
 - a. Drainage area to each proposed infiltration berm with drainage area labeled with square feet.
 - b. Different cover types should be labeled within each drainage area to be used for runoff volume calculation.
 - c. Runoff volume calculation from the 2-year/24-hour storm event to each berm.
 - d. Surface area of the runoff volume from the 2-year/24-hour storm event collected by each berm (show the limits of the surface area and label with square feet) (this will be the area of infiltration above the berm) (this area is part of the BMP and should be protected and maintained).
 - e. Infiltration test locations and recommended infiltration rate at each berm location (recommended by a licensed professional).
 18. Please update the PCSM and E&S Plan drawings with the following [102.4 and 102.8]:
 - a. Show proposed contours for each proposed infiltration berm.
 - b. Add top of berm elevation for each proposed infiltration berm.

19. On the E&S Plan drawings, there are large areas of disturbance areas beyond the limits of the pipeline. Please label these areas with what is intended, such as construction staging areas, pipe lay down areas, proposed pump station, etc. If there is proposed earth disturbance in these areas, these earth disturbance activities should be depicted with limits and specified on these E&S Plan drawings, such as strip topsoil, grading (with proposed contouring), stone placement (with depth and gradation of stone specified), etc. [102.4]

Chapter 105 Applications Nos E15-862 and E23-524

The original comment has been included below verbatim, followed by SPLP's response in RED and DEP's response in GREEN.

1. Note 1 on the wetland impact table indicates that all wetlands listed will have temporary road crossings. Revise the wetland impact tables to indicate which resources will also require temporary road crossings and also quantify those temporary impacts. This includes temporary road crossings after the pipes are installed. A total number of temporary road crossings should also be provided. [25 Pa. Code Sections 105.13(e)(1)(iii) and 105.15(a) and Environmental Assessment Form]

SPLP Response:

All the crossings requiring a temporary road crossing are called out on the revised Aquatic Resource Impact tables located in Attachment B. They are totaled at the end of each table. All open cut crossings will require the bridge or temporary matting to be left in after the pipe is installed to facilitate restoration.

DEP Response:

No change has been made to the table except for the addition of Wetlands C38 & C40, and the removal of C44 & C79. Note 1 indicates that all wetland crossings except HDD will require temporary road crossings. **Where are the temporary road crossings (using wetland matting) tabulated?**

Note 6 indicates that there will be additional temporary workspaces and temporary access roads associated with operation and maintenance and that these additional impacts are not included in the tabulation of the Temporary Disturbance. **Are these permanent impacts? Where are they tabulated?**

2. Revise the impacts table to specify the linear footage for both temporary and permanent stream impacts. [25 Pa. Code Sections 105.13(e)(1)(iii) and 105.15(a) and Environmental Assessment Form]

SPLP Response:

Aquatic Resource Impact tables located in Attachment B have been revised to reflect these linear footages.

DEP Response:

We are asking you to specify ALL of the temporary and permanent impacts, this includes the rows indicated as having “Open Cut Floodway/Temp Crossing or Road.

3. Revise the plans to include: existing and proposed contours, the existing pipeline permanent ROW, existing pipelines and other utility lines in the vicinity of the project, proposed and existing ROW boundaries along proposed HDD and Bore paths, and lots (show property lines and names of adjoining property owners). *[25 Pa. Code Sections 105.13(e)(1)(i)(B), 105.13(e)(1)(i)(C), and 105.301(2) and Document No. 3930-PM-WM0036, III., Section F., h., (1), (b)]*

SPLP Response:

The site plans have been revised to include existing contours. The proposed contours will be restored and therefore are the same. We have placed SPLP’s existing 8-inch pipeline alignment on the site plans. In regards to depicting the easement associated with the 8-inch line, the original easement from the 1930’s was a blanket easement with no specified ROW width, therefore there is no legal bounds to that easement. We now depict foreign utility lines in the vicinity of the project areas and the proposed easement is depicted across bores and HDDs. A full set of revised site plans is provided in Attachment C. Property owner information is also displayed, however is coded and linked to a table listing that is also provided in Attachment C.

DEP Response:

OK

4. Provide a site-specific cross section for each proposed HDD and bore crossings impacting waters of the Commonwealth. The cross sections must include wetland boundaries. *[25 Pa. Code Sections 105.13(e)(1)(i)(G) and 105.301(5)]*

SPLP Response:

Site-specific cross sections of the HDDs were provided in Attachment 7 of the application. However, at this time SPLP would like to take the opportunity to update the application with revised HDD drawings. SPLP has prepared a drawing for the proposed 20 inch line and the 16 inch line. Those updated drawings are included in Attachment D.

Only one bore crosses under aquatic resources in Chester County. This drawing is provided in Attachment D. All of the drawings depict the wetland boundaries.

No bores cross under aquatic resources in Delaware County.

DEP Response:

OK

5. Revise the provided HDD cross sections, or provide separate cross sections, to clearly depict at a sufficient scale the existing and proposed stream bed and banks. *[25 Pa. Code Sections 105.13(e)(1)(i)(G) and 105.301(5)]*

SPLP Response:

Construction ready HDD drawings were provided in Attachment 7 of the application and a revised submission of those drawings is included herein as Attachment D. Horizontal directional drilling is designed to avoid impacts to the aquatic resources that are located above the drilled area. Therefore, there are no proposed changes to the stream bed or banks. The top of the pipe will be located deep enough to provide 3 feet of cover per Sunoco and PADEP regulations. The HDD drawings provided include a detailed plan and profile of the HDD including the demarcation of stream and wetlands crossings along with the depth of the pipe from the surface elevation.

DEP Response:

The drawings provided in Attachment D are labeled “Not for Construction, Issued for Permit Only”

6. Provide cross sections for the proposed wetland crossings which depict existing and proposed conditions and structures. In addition, where standard cross sections do not accurately reflect the proposed or existing conditions for stream and/or wetland crossings, provide site-specific cross sections. [25 Pa. Code Sections 105.13(e)(1)(i)(G) and 105.301(5)]

SPLP Response:

We added a typical wetland crossing drawing to our E&S Plan and is included in Attachment E. This includes a profile. In addition, all the crossings have been reviewed for atypical wetland and stream crossing situations and site-specific drawings prepared. Those site-specific drawings for Chester and Delaware Counties are included in Attachment E.

DEP Response:

OK

7. The provided plans and standard details do not depict the location or orientation of pipe installation, work spaces, rights-of-way, structures, and other features in waters of the Commonwealth. Provide plans and details which clearly indicate how what water obstructions and encroachments are proposed in work spaces within waters of the Commonwealth. [25 Pa. Code Section 105.13(e)(1)(i)]

SPLP Response:

The provided site plans, provide the location of the pipes and the orientation of them by provision of a north arrow. All the work spaces are also called out as permanent ROW, temporary ROW, additional temporary workspace, block valve setting LOD, permanent access road, and temporary access road. The bore and HDD locations are depicted in addition to all of the applicable resources data, including ephemeral, perennial, and intermittent streams, ponds, PEM, PSS, and PFO wetlands. In addition, all permanent and temporary impacts are quantified, as well as Chapter 93 and PAFBC designations. Additional temporary workspace falling in floodways and wetlands have been called out on the revised site plans included in Attachment C as to the proposed use (e.g., spoil storage, equipment staging, and turnaround area).

DEP Response:

We are looking for detail plans similar to S-B18-19-C-101 provided in the E&S plan set.

8. Provide an assessment of the functions and values of the wetlands which are proposed to be impacted. A methodology for this assessment which DEP generally finds acceptable is the U.S. Army Corps Highway Methodology found here:
<http://www.nae.usace.army.mil/Portals/74/docs/regulatory/Forms/HighwaySupplement6Apr2015.pdf>. However, a more detailed assessment may be necessary on a case-by-case review from DEP. [25 Pa. Code Section 105.13(e)(3)]

SPLP Response:

SPLP has provided a functions and values assessment as provided in Attachment F.

DEP Response:

OK

9. A watershed storm water management plan has been prepared or adopted under the Storm Water Management Act; therefore, provide a letter from the local municipality indicating consistency with their Storm Water Management Program. [25 Pa. Code Section 105.13(d)(1)(v)]

SPLP Response:

A stormwater management analysis is provided for all non-temporary disturbances within the ESCGP-2 application and county approval is obtained through the Chapter 102 process. In addition, consistency request from Townships with adopted 167 plans have been requested and those requests are located in Attachment G.

DEP Response:

Please provide the ESCGP-2 application numbers associated with the stormwater management plans that have been submitted to the Townships listed in Attachment G. Additionally, please provide all response correspondence from the Townships listed in Attachment G, related to stormwater consistency and floodplain consistency.

10. The proposed project is located within a floodway delineated on the municipal FEMA map; therefore, please provide a letter from the local municipality indicating consistency with their municipal Floodplain Management Program. [25 Pa. Code Section 105.13(e)(1)(vi)]

SPLP Response:

A consistency request has been sent to those Townships where the proposed project is located within a FEMA designated floodway, and those requests are located in Attachment G.

DEP Response:

OK

11. Since the proposed water obstruction/encroachment poses a threat to human life or substantial potential risk to property, the plans, specifications, and reports accompanying such applications must be affixed with the seal of a registered professional engineer and a

certification statement, signed by the registered professional engineer, which shall read as follows: [25 Pa. Code Section 105.13(j)]

"I (name) do hereby certify pursuant to the penalties of 18 Pa.C.S.A., Section 4904 to the best of my knowledge, information and belief, that the information contained in the accompanying plans, specifications, and reports has been prepared in accordance with accepted engineering practice, is true and correct, and is in conformance with Chapter 105 of the rules and regulations of the Department of Environmental Protection."

SPLP Response:

SPLP has provided the seal and signature page affixed to the cover page of the site plan sheets located in Attachment C.

DEP Response:

The seal and signature page was not found as indicated above.

cc: Mr. Smith
Mr. Hohenstein
Ms. Atkinson
Ms. Roda
Re 30 (GJS15WAW)26-10