



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

October 26, 2015

RECEIVED

OCT 29 2015

Mr. Matthew Gordon
Sunoco Logistics, L.P.
535 Fritztown Road
Sinking Spring, PA 19608

Re: Incompleteness Review Letter
Pennsylvania Pipeline Project
Southeast Regional Office Submission
Construction Spread 6
DEP File No. ESG01000150001
East Goshen, East Nantmeal, East Whiteland, Upper Uwchlan,
Uwchlan, Wallace, West Goshen, West Nantmeal, Westtown,
and West Whiteland Townships and Elverson Borough, Chester County
Aston, Chester, Edgmont, Middletown, Thornbury,
and Upper Chichester Townships and Brookhaven Borough, Delaware County

Dear Mr. Gordon:

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 is 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.

Please note that pursuant to 25 Pa. Code Section 102.6(c), this information must be received within sixty (60) calendar days by December 28, 2015, or DEP may consider the application withdrawn.

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.

General Comments:

1. Provide calculations for all proposed Compost Sock Sediment Traps. Include, at a minimum, all of the information requested by Standard E&S Worksheet No. 19. [25 Pa. Code Sections 102.4(b)(5)(viii) and 102.11(a)(1)]
2. Provide calculations for all proposed Compost Sock locations. Include, at a minimum, all of the information requested by Standard E&S Worksheet No. 1, or a description of how the sock size was determined and any different sediment barriers such as silt fences and haybales

(Worksheets 3—7). It is recommended to label each section of perimeter control on the plans, so it can be cross referenced to the worksheets at technical review. Please keep in mind that perimeter controls are to be designed for the maximum slope length above, not just the work area slope length. [25 Pa. Code Sections 102.4(b)(5)(viii) and 102.11(a)(1)]

3. Naturally occurring geologic/soil conditions that have the potential to cause pollution should be addressed either on E&S Control Plan drawings or in the narrative. Several site specific soils identified in the narrative are susceptible to sinkhole formation, as per Table E.1 in the E&S Manual. The E&S Plan should provide measures to avoid/minimize/or mitigate the potential for pollution in the event that a sinkhole is encountered during construction. Refer to Chapter 17 of the E&S Manual for further guidance. [25 Pa. Code Sections 102.4(b)(5)(xii) and 102.11(a)(1)]
4. Pyritic rock could be a concern for many areas. If so, how will it be addressed and or controlled if encountered. Please provide a statement of how the contractor is to address any issues if they should arise. [25 Pa. Code Section 102.4(b)(5)(xii)]
5. An adequate predevelopment site characterization and assessment of soil and geology, including appropriate infiltration and geotechnical studies, was not provided for the Post Construction Stormwater Management (PCSM) Best Management Practices (BMPs). Refer to Appendix C of the PCSM Manual for guidance on infiltration and geotechnical studies. Descriptions of the soils listed should be included. [25 Pa. Code Sections 102.8(g)(1) and 102.11(a)(2)]

Notice of Intent (NOI) for Coverage Form

6. NOI, Section C, Question 3 - Under Project Description — The number of miles in the first paragraph is marked as XXX miles. [25 Pa. Code Section 102.6(a)(1)]
7. NOI, Section C, Question 6 — The total area and disturbed area in the phasing box was not completed. [25 Pa. Code Section 102.6(a)(1)]
8. NOI, Section F — Summary Tables are provided for each station where a PCSM BMP (infiltration berm) is being installed. The one area is listed as Glen Mills - Chester County. However, in Tab 7, the worksheets and map are provided for this station and called “Glenn Mills/South Chester.” An aerial of this area was also given calling it “Slitting Mill Road” which is in Delaware County but it does not appear to be an area along this road. Based on the information provided, it is uncertain if this area in question is in Delaware or Chester County. [25 Pa. Code Section 102.6(a)(1)]
9. NOI, Section B, the box for Boro should also be checked. [25 Pa. Code Section 102.6(a)(1)]
10. NOI, Section F — Summary Table indicates an increase in Stormwater Runoff at a location called Exton Junction - Chester County; the summary description in Box 4 indicates 1008 acres treated, please reevaluate the acres treated for all the areas where there is an increase in impervious in Chester County. Revise as needed. [25 Pa. Code Section 102.8(b)]

Checklist Items

11. Checklist Item 2.e Surface Water Classification could not be found in Tab 3. When revising, please refer to comment above where it appears the totality of streams and designations are missing. NOI, Section C, Box 18 refers to Attachment 3. The Provided Table in Attachment 3 is missing multiple receiving waterways from the project site; please provide a comprehensive list of stream names and designations for all portions of the project site. [25 Pa. Code Section 102.4(b)(5)(v)]
12. Checklist Item 2.j Maintenance Program should include the completion of a written report documenting each inspection. [25 Pa. Code Section 102.4(b)(5)(x)]
13. Checklist Item 6.j – Tab 7, page 12 of the Narrative should address a written report for each inspection of the PCSM BMPs. [25 Pa. Code Section 102.8(f)(10)]
14. Checklist Item 7 box should be checked both YES and NO since this site is proposed both restoration and structural PCSM BMPs in a few areas where impervious is being proposed. [25 Pa. Code Section 102.6(a)(1)]

Additional Comments:

15. NOI, Section E, Box 1 indicates the project is compliant with local Act 167 ordinances. However, please note that the currently approved Chester Countywide Act 167 stipulates that the predevelopment land cover condition will be presumed to be meadow when performing stormwater calculations. Additionally, the provided Act 167 verification report for Chester County states, in part, 4.0 *Stormwater Management and Act 167 Compliance* “In general, the pre-construction drainage patterns surrounding the project will be maintained, and all disturbed areas within the pipeline ROW will be restored to a meadow in good condition.” Sunoco will need to reevaluate this item to ensure compliance with Act 167. [25 Pa. Code Section 102.8(g)]
16. Also, please find enclosed two letters from Thornbury and Uwchlan Townships commenting on the project which Sunoco and Tetrtech were copied on.

Delaware County Conservation District - Point of Contact – Michelle Ferri
Chester County Conservation District - Point of Contact – Joe Sofranko

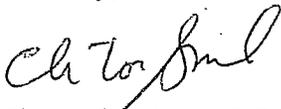
You may request a time extension, in writing, before December 28, 2015, to respond to the deficiencies beyond the sixty (60) calendar days. Requests for time extension will be reviewed by DEP and considered. You will be notified in writing of the decision either to grant or deny, including the specific due date to respond if the extension is granted. Time extensions shall be in accordance with 25 Pa. Code Section 102.6(c).

As stipulated in 25 Pa. Code Section 102.6(c) of DEP’s Chapter 102 rules and regulations (regarding complete applications), information requested by this office must be received within sixty (60) calendar days from the date of this letter, on or before December 28, 2015, or DEP will consider the application to be withdrawn by the applicant and no further action will be taken on the application. Fees are not refunded when an application is considered to be withdrawn.

Please submit one (1) hard copy and one (1) PDF copy on CD-ROM of the revised E&S/SR and PCSM Plan Drawings & Narratives to all of the County Conservation Districts, one (1) hard copy and one (1) PDF copy on CD-ROM of the revised E&S/SR and PCSM Plan Drawings & Narratives to Mr. William Himes at DEP's Altoona District Office at 3001 Fairway Drive, Altoona, PA 16602, and one (1) hard copy and one (1) PDF copy on CD-ROM of the revised E&S/SR and PCSM Plan Drawings & Narratives to DEP's Southeast Regional Office at the address located in the first page footer.

If you have questions about your application, please contact Mr. William Himes at 814.946.7325 and refer to ESG01000150001.

Sincerely,



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

Enclosure

cc: Mr. Simcik, Tetrattech
Ms. Ferri – Delaware County Conservation District
Mr. Sofranko – Chester County Conservation District
Elverson Borough
West Nantmeal Township
East Nantmeal Township
Wallace Township
Upper Uwchlan Township
Uwchlan Township
West Whiteland Township
East Whiteland Township
West Goshen Township
East Goshen Township
Westtown Township
Thornbury Township
Edgmont Township
Middletown Township
Aston Township
Brookhaven Borough
Chester Township
Upper Chichester Township
Re 30 (GJS15WAW)295