

BOARD OF SUPERVISORS  
EAST GOSHEN TOWNSHIP  
CHESTER COUNTY  
1580 PAOLI PIKE, WEST CHESTER, PA 19380-6199

April 20, 2017

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

Re: Erosion and Sediment Control (E&S) Permit  
Pennsylvania Pipeline Project

Dear Mr. Gordon:

East Goshen has reviewed your Erosion and Sediment Control plan for the Pennsylvania Pipeline Project and determined that it is in compliance with the requirements of the East Goshen Township Act 167 Ordinance, §195 of the East Goshen Township Code.

Accordingly, the Erosion and Sedimentation Control permit for the earth disturbance proposed for the pipeline project areas within East Goshen Township has been issued with the following conditions:

1. The permit fee of \$100 shall be submitted and payable to East Goshen Township.
2. A pre-construction meeting shall be scheduled at the first project area prior to any type of clearing or construction activity.
3. Once the E&S controls have been installed and inspected the earth disturbance activities (i.e. drilling operation or excavation) can begin.
4. We will repeat this process for each new work area as the project progresses.

The Township Engineer's review letter dated April 20, 2017 is enclosed for your use.

Please contact me with any questions and to schedule the pre-construction meeting

Sincerely,



Mark A. Gordon  
Township Zoning Officer

Enclosure

CC: Nathan Cline, Township Engineer (via email only)  
Ivana Wolf, Sunoco Logistics (via email only)  
Rick Smith, Township Manager



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April 20, 2017

EGOS 0730

Mark Gordon, Zoning Officer  
East Goshen Township  
1580 Paoli Pike  
West Chester, PA 19380

**RE: Sunoco Pennsylvania Pipeline Project – 2<sup>nd</sup> Submission**

Dear Mark:

As requested, we have reviewed the following information, prepared by Tetra Tech, in connection with the referenced project:

- *“Pennsylvania Pipeline Construction Spread 6, Chester County Conservation District, E&S Control & Site Restoration Plan”*, dated March 18, 2016, last revised February 6, 2017, Sheets ES-0.01 to 0.11 and ES-6.56 to ES-6.69 and supplemental information including March 9, 2017 and April 17, 2017 response letters.

The plans propose six (6) separate boring pit/staging area locations associated with the pipeline installation within the Township; no wetland or stream crossings are proposed. Per correspondence from Tetra Tech dated July 22, 2016, they are seeking confirmation from the Township that the noted plan submission conforms to the *Chester Creek Act 167 Plan* and the subsequent County-wide update, which has been adopted as the Township’s Stormwater Management Ordinance (§195). The Chester County Conservation District requires this confirmation as part of their permit review process.

We offer the following comments (new comments in ***bold/italics***):

**STORMWATER MANAGEMENT (§195)**

1. An East Goshen Township Stormwater Management (SWM) Permit is required, as this project meets the definition of “*regulated activity*”. (§195-15.A)  
**RESOLVED.**
2. Persons proposing to construct regulated activities with one (1) acre or more of proposed earth disturbance that do not discharge directly to waters of the Commonwealth shall provide the Township with a copy of the easements authorizing such discharge or confirmation from PaDEP that an easement is not required. (§195.15.G) Based on the plans provided, it is unclear if this situation occurs; additional plan information is necessary, addressed further below.  
**RESOLVED. The applicant has indicated there are no areas of concentrated flow in the Township.**
3. In the referenced correspondence, it is indicated that “*the project limits of disturbance will be restored to meadow...*”. However, some of the areas proposed to be disturbed (and returned to meadow) are currently heavily vegetated or wooded. Furthermore, it is unclear how each area is intended to be restored; no meadow plantings or seed mixes are proposed, and it is more likely a ‘lawn’ condition would be established. Therefore, different runoff coefficients may be applicable, possibly causing the

total post-construction runoff volume to exceed that of predevelopment. Further analysis may be warranted to confirm that the requirements of §195-19 through §195-24 are being met.

**RESOLVED. The applicant has indicated all areas within the LOD will be restored to pre-construction conditions. Clarification regarding the scope of work and site visits confirm no wooded areas are affected.**

4. Any facility located within a PennDOT right-of-way shall comply with PennDOT minimum design standards and permit submission and approval requirements. Copies of approved Highway Occupancy Permits and associated detour plans, where applicable, shall be provide with the SWM Permit submission. (§195-24.F)

**RESOLVED. The applicant has provided all approved PennDOT permits.**

5. Regarding the SWM site plan contents, the following shall be provided:
  - a. A listing of all regulatory approvals required and the status for each. Proof of application or documentation of approval for each shall be part of the SWM site plan. (§195-27.A.(2))  
**RESOLVED. The applicant has provided a list of all regulatory approvals and clearances.**
  - b. The statement and signature block signed and/or sealed by the applicant and/or engineer per §195-27.A.(3) & (4).  
**RESOLVED.**
  - c. Plans shall be provided in 24-inch by 36-inch format. (§195-27.B)  
**RESOLVED.**
  - d. Tax parcel numbers, names, address and phone numbers of the owners of the subject properties. (§195-27.B)  
**RESOLVED. A "Land Owner Table" has been provided**
  - e. Additional detail regarding the legal property boundaries, per §195-27.B.(7).  
**RESOLVED. A "Land Owner Table" has been provided.**
  - f. A list of potential PNDI impacts and clearances, if the total earth disturbance exceeds one acre. (§195-27.B.(8)(g)).  
**RESOLVED. The applicant has provided the PNDI clearance letters.**
  - g. Any steep slope areas. (§195-27.B.(8)(j))  
**RESOLVED. The applicant has indicated there are no steep slope areas.**
  - h. Soil names and boundaries, hydrologic soil groups. (§195-27.B.(8)(k))  
**RESOLVED.**
  - i. Any contaminated subsurface areas. Note the Sunoco gas station at the northwest corner of the intersection of North Chester Road and Paoli Pike is currently subject to a PaDEP Remedial Action Plan (DEP Facility ID No. 15-20353). (§195-27.B.(8)(m))  
**RESOLVED. The Sunoco gas station is now indicated on the plans. The applicant notes the pipeline will be installed via HDD approximately 45-50 feet below ground surface.**
  - j. Location of existing wells and recharge areas on the project properties. (§195-27.B.(8)(n))  
**RESOLVED. A "Water Supply Assessment, Preparedness, Prevention and Contingency Plan" was provided. However, they note "The locations of these wells are kept within the Project files and are not displayed here to protect the rights of the individual owners. Although the PAGWIS data is made available to the public, the accuracy as stated within the metadata is not reliable and what SPLP has or will obtain represents exact well locations." (Section 4.1) Per discussions with Tetra Tech representatives, it is our understanding all well testing is being coordinated with individual property owners and DEP in accordance with this Plan.**
  - k. Description of existing and proposed ground cover and land use, including the type and total area. (§195-27-B.(10)).  
**RESOLVED.**



- l. The location of all existing utilities within the site and with 50 feet of the proposed limits of disturbance. (§195-27.B.(15))  
**RESOLVED. Note continued utility coordination with PA One Call will run concurrently with the project.**
  - m. The total disturbed area in square feet and acres. (§195-27.B(16)) We recommend it be provided for each separate area.  
**RESOLVED. The total disturbed area is 551,969.13 square feet.**
  - n. A written description of the information required within §195-27.C shall be included in SWM site plan, notably: existing conditions (C).(1); the effect of the project on various features (C).(5); proposed nonpoint source pollution controls (C).(6); project time schedule (C).(7); and construction stages/phases, if applicable (C).(8).  
**RESOLVED. The applicant has indicated the information is provided within the narrative of the E&S and PCSM reports.**
6. As there are no permanent BMPs currently proposed, nor any changes to existing elevations, it does not appear plan recording, an O&M plan/agreement, nor as-built plans would be warranted.  
**RESOLVED.**
7. The Township should confirm anticipated fees and expenses will be covered by the applicant. (§195-35)  
**RESOLVED. The applicant has agreed to cover anticipated fees and expenses.**
8. It is unclear if the Township will have right of entry to the multiple properties involved with the project. (§195-46)  
**RESOLVED. The applicant has indicated the Township will have the right of entry.**

#### E&S PLANS

9. General:
  - a. Are the proposed limits of disturbance sufficient for all construction activities, including material storage, deliveries, equipment and parking?  
**RESOLVED. The applicant has indicated the area is sufficient for construction.**
  - b. It is unclear why Note 18, Sheet ES-0.01 indicates Uwchland Township only.  
**RESOLVED. The note has been removed from the plans.**
  - c. Please confirm the proposed infiltration berm referenced on Sheet ES-0.02 (amongst other sheets) is not located within East Goshen Township; it was not apparent on the design plans.  
**RESOLVED. The applicant has confirmed the infiltration berm is not located within the Township.**
  - d. Please clarify what specific seed mix is intended for the disturbed areas within East Goshen Township, as 'lawn' areas are not indicated on the provided tables (Sheet ES-0.07).  
**RESOLVED. The seed mixture to be used is indicated on Sheet ES-0.04.**
  - e. What is the method for replacing existing vegetation? For example, along Boot Road in front of the shopping center where the pipeline is to be excavated. Decorative screening including mature trees and shrubs extend throughout this entire area. Other areas present similar concerns.  
**RESOLVED. The applicant has indicated the existing vegetation will be removed. It will be the responsibility of the property owner to plant decorative shrubs once construction is complete if they'd like. Note, mature trees cannot be planted within the pipeline ROW.**
  - f. Do the plans provided to the Township reflect the changes documented in the March 2016 "Workspace Changes" plan set?

**RESOLVED. The applicant has indicated the plans reflect these changes.**

- g. Various boring locations include monument signs for business or neighborhoods; these potential conflicts do not appear on the plans.

**RESOLVED. The applicant has indicated the signs are to be bored under and will not be affected.**

- h. Inlet protection is not provided.

**RESOLVED. The applicant has indicated it will be implemented where needed.**

10. Regarding Sheets ES-6.56/ES-6.57:

*Note: Though located within West Goshen Township, the staging area in this location drains to East Goshen Township.*

- a. The proposed access location for this staging area is a very challenging location of a four lane cross section of North Chester Road between the SR 202 on-ramp and Greenhill Road intersection.

**RESOLVED.**

- b. It is unclear what is proposed by the "Riparian Forest Buffer"; no detail is provided.

**RESOLVED.**

- c. No E&S controls are proposed on the south side of the tributary to Ridley Creek, a High Quality (HQ) stream that drains to East Goshen Township. However, E&S controls are proposed on the north side of the same tributary; it's unclear why the limit of disturbance extends to the opposite side of the stream.

**RESOLVED. Additional E&S controls have been added south of the stream. Note the LOD no longer crosses the stream.**

- d. It is unclear what material is proposed for the "Proposed Parking Area"; the limits of this area are unclear. Stormwater management controls may be required.

**RESOLVED. The applicant has indicated the proposed parking area is temporary and no surface coverage change is planned. Timber mats will be used if necessary.**

11. Regarding Sheets ES-6.58/ES-6.59:

- a. The limit of disturbance extends much further north than the boring pit area; it's unclear why the LOD is so large and if no excavation proposed, why the E&S controls are proposed in these areas. Further, the LOD appears to include driveways and parking of the adjacent sites; it's unclear why the LOD extends into these areas. Further information should be provided if access between these adjacent sites it be impeded or limited and if parking spaces, drive aisles and/or driveways are to be unavailable for users and emergency services.

**RESOLVED. The applicant has indicated the area will be used for a HDD work space pullback and vehicle parking. A portion of the road will be vehicle and equipment accessing the workspace however will not block the parking lot. The other area of the road is designated as temporary workspace and will be fenced off and used for the HDD and open cut construction activities.**

- b. The plans do not indicate an existing concrete median in the shopping center driveway, limiting ingress/egress. We recommend the proposed construction entrance location be reviewed due to the presence of the median and its location immediately adjacent to an existing traffic signal.

**RESOLVED. The construction entrance has been relocated and the median indicated on the plans.**

- c. The compost filter sock and aggregate stockpile leaders are incorrect.

**RESOLVED. The leaders have been corrected.**

12. Regarding Sheet ES-6.60:

- a. Silt fence and the LOD are shown within the cartway.

**RESOLVED.**

13. Regarding ES-6.61/ES-6.62:

- a. The plans do not indicate an existing concrete median within Enterprise Drive, limiting vehicle ingress/egress. This staging area proposes four (4) construction entrances. We recommend the proposed entrances be reviewed and consolidated to the most appropriate location(s).  
**RESOLVED. The median is now indicated on the plans. The applicant has indicated this location will primarily be used as an exit point with right in/right out traffic flow.**
- b. The purpose of the proposed LOD area extending south towards Paoli Pike is unclear. Currently it's a stormwater management basin and does not appear to be an appropriate location for material storage, parking or similar activities.  
**RESOLVED. The applicant has indicated this area will be used for temporarily string out for pullback of the HDD. The area will be covered in timber or composite mats to protect the basin.**
- c. It appears the compost sock filter leader should state silt fence.  
**RESOLVED. The leader has been corrected.**
- d. A portion of the LOD appears to extend into the cartway of North Chester Road.  
**RESOLVED. The LOD has been removed from the cartway.**

14. Regarding Sheet ES-6.64:

- a. Multiple buildings are not indicated on the east side of North Chester Road.  
**RESOLVED.**
- b. We recommend the proposed construction access at the intersection of East Boot Road and North Chester Road be reviewed due to its close proximity to an existing signal.  
**RESOLVED. The applicant has indicated a traffic study was conducted and prepared a traffic control plan which was submitted to PennDOT.**
- c. The plans do not indicate an existing concrete median within Eldridge Drive, limiting vehicle ingress/egress. We recommend the proposed construction entrance location be reviewed.  
**RESOLVED. The concrete median has been indicated on the plans.**
- d. The limit of disturbance extends much further north than the boring pit area; it's unclear why the LOD is so large and if no excavation proposed, why the E&S controls are proposed in these areas.  
**RESOLVED. The applicant has indicated the areas are HDD pullback and staging areas required for construction.**

15. Regarding Sheet ES-6.66:

- a. An existing residence at the northeast corner of the intersection of North Chester Road and Bow Tree Drive is not indicated.  
**RESOLVED.**
- b. The plans do not indicate an existing concrete median within Bow Tree Drive, limiting vehicle ingress/egress. We recommend the proposed construction entrance location be reviewed.  
**RESOLVED. The median is now indicated on the plans. The applicant has indicated this location will primarily be used as an exit point with right in/right out traffic flow.**

16. Regarding Sheet ES-6.69:

- a. Please be advised that the proposed staging areas is a low-lying area that frequently ponds with water and may not be appropriate for the proposed activities.  
**RESOLVED. The applicant has indicated the contractor has been informed of this information.**

MISCELLANEOUS

- 17. We recommend sight distances for all proposed accesses meet minimum PennDOT requirements.  
**RESOLVED. The applicant has obtained required permits from PennDOT.**

18. It is unclear if the construction access locations have been designed to accommodate all anticipated vehicles utilizing the same.

***RESOLVED. The applicant has indicated all construction entrances have been designed to accommodate anticipated vehicles and obtained all required permits from PennDOT.***

19. All contractors and subcontractors will be required to register with the Township. (§124)

***RESOLVED. The applicant has indicated all contractors and subcontractors will register with the Township.***

20. Much of the construction will take place in or near residential areas; it is unclear if the project will comply with the sound level limits of §156.

***RESOLVED. The applicant has indicated it will comply with the Township's ordinances and work with the Township in the event any special circumstances result in higher sound level limits.***

21. It may be appropriate to have the Township's designated emergency services personnel review the plans.

***RESOLVED. The applicant has indicated they have met with the Township's emergency service personnel and the Township officials to discuss the project.***

Should you have any further questions or comments, please contact me.

Sincerely,

PENNONI



Nathan M. Cline, PE  
Township Engineer

cc: Rick Smith, Township Manager (via e-mail)  
Mark Miller, Public Works Director (via e-mail)  
Bill Smith, PE, Tetra Tech (via e-mail)  
Matt Gordon, Sunoco Logistics (via e-mail)