

BY OVERNIGHT (OR EXPRESS) MAIL

August 10, 2020

Mr. David Sprout
Stormwater Management Officer
Town of Dryden
93 East Main Street
Dryden, New York 13053

**RE: Dominion Energy Transmission, Inc.
Borger Replacement Project
Response to July 9, 2020 Stormwater Pollution Prevention Plan (SWPPP)
Comments
Tompkins County, New York**

Dear Mr. Sprout:

Dominion Energy Transmission, Inc. (DETI) has prepared this response to comments contained in the July 9, 2020 letter from T.G Miller, P.C. regarding the Borger Replacement – SWPPP review. Please find responses to each question below.

Stormwater Management:

1. Provide a narrative describing existing conditions, including the condition of the diversion swale at the north end of the site, infiltration beds and monitoring wells if present, existing ditch, etc.

Response: A more detailed description of existing conditions was added to Section 2.1.6 of the SWPPP.

- a. Confirm that existing infiltration beds are functioning properly. Have existing infiltration rates been confirmed or is there evidence of the existing infiltration beds not draining? The 2010 SWPPP from T.G. Millers records shows infiltration rates >5 in/hr, which requires 100% pretreatment of the WQv. Revise pretreatment calculations accordingly.

Response: The existing infiltration beds are inspected on a regular basis as part of the approved Operation, Maintenance, and Reporting Agreement. The latest inspection was done on June 18, 2020. The infiltration beds were both observed to be functioning properly, with no evidence of water lines or standing water. Anecdotal information provided by facility personnel indicates that the beds never have standing water even after heavy rainfall events. Pre-treatment calculations have been added to the PCSM calculation worksheet in Appendix F of the SWPPP.

2. The northern proposed diversion drain is sized for the 10-yr storm event. Will runoff be directed to the existing northern diversion swale when the capacity of the drain is exceeded? Will the existing diversion swale be maintained and does it have sufficient capacity for the 100-year storm event? Review offsite watershed with relationship to the highpoint in Ellis Hollow Creek Road. Will the proposed diversion drain alter the watersheds?

Response: It was determined that the diversion did alter the watersheds in a way that a change to the plan was required. The diversion was redesigned to be a parabolic channel and outlet to the east as shown on revised plan sheets C-3 and C-5. The redesigned diversion has capacity for the 100-year storm as demonstrated in the calculation worksheet in Appendix F of the SWPPP. The level spreader was also redesigned to receive flow from a channel. The revised diversion location also caused a minor change in the PCSM calculations in Appendix F.

3. It appears the 2010 SWPPP shows an approximate 1' high berm around Bed #2. Clarify if the berm currently exists or if a new berm is proposed to provide additional storage volume.

Response: The berm does exist. However, the 30-foot opening in the berm as designed in the 2010 SWPPP is not present. The berm will be modified to create the 30-foot opening and extended to capture additional runoff from the new development, as depicted on plan sheet C-3.

4. Clarify how the infiltration bed has been modeled in the post developed conditions. Has the porosity of the stone and infiltration rates been accounted for? It appears the freeboard for Bed #1 and Bed #2 are greater in the 2020 SWPPP compared to 2010 SWPPP.

Response: The porosity of the stone was assumed to be 40% and is accounted for as indicated in Table 2 and Table 3 of the PCSM Calculation Worksheet in Appendix F. The 2010 SWPPP software models were not available for use, and there were some issues found in the 2010 SWPPP calculations as described in the PCSM Calculation Worksheet. Therefore, the approach taken was to remodel the entire 2010 calculation. The freeboard is addressed in response to comment #5.

5. Model the existing infiltration basin as they are currently functioning and compare this to the previously approved SWPPP. Are the existing basins functioning as originally designed? Account for the existing basins in the pre-developed model.

Response: The basins do appear to be functioning as designed based on a recent inspection in June 2020, with no indication that water levels ever get above the overflow weir. This is consistent with the 2010 SWPPP design, which states that "Post-Dev Runoff Volume is 100% controlled, thus the runoff rates (cfs) for Q1, Q10 and Q100 are 0." Note that when the tested infiltration rate is applied to the Infiltration Bed #2, the proposed developed condition in 2020 produces the same result. A safety factor of 5 was applied to the infiltration rate in the previous calculation that produced some discharge rates for the 10-year and 100-year storms. Instead of attempting to account for the existing basins in the pre-developed model to produce a zero-outflow result, that result is assumed. The safety factor has been

adjusted in the 2020 calculation to also produce a zero-outflow result. This is clarified further in the PCSM Calculation Worksheet in Appendix F.

6. Hydrologic calculations and water quality volume calculations show different impervious areas for post-controlled B2 drainage area. Revise calculations to correspond with each other.

Response: The impervious area used for the Bed #2 WQv calculation included impervious areas from the Bed #1 calculation because Bed #1 drains to Bed #2. The Bed #1 impervious area does not need to be counted twice, so it was removed from the Bed #2 WQv calculation.

7. Complete Owner contact information on the MS4 acceptance form.

Response: The owner contact information was updated on the form.

8. Clarify how the existing turbine building and adjacent areas are directed to Bed#2. The 2010 SWPPP shows an existing pipe discharging to the grass lined swale NW of the drainage swale. Clarify whether the pipe is present and functioning properly. See sketches below.

Response: The locations of both yard drains from the 2010 SWPPP that convey overflow from Bed #1 to Bed #2 have been verified. The outlet into the drainage swale has not been visually located in the field. It is assumed that the outlet exists somewhere in the grass swale, or it was piped directly into Bed #2. The yard drains on Sheet C-3 have been numbered and the following note added: "The outlet of the existing Yard Drain #2 shall be verified in the field by the Contractor to directly outlet into Yard Drain #3, Yard Drain #4, or Infiltration Bed #2."

9. Coordinate with Town Attorney for O&M agreement and attach to SWPPP if not already provided with previous SWPPP's. Recommend including the entire site and any existing permanent stormwater practices that have been installed (existing infiltration beds and diversion swale, proposed diversion drain, flow spreader, etc.).

Response: Based a review of the existing Operation, Maintenance, and Reporting Agreement and the Permanent Easement for Stormwater Facility Maintenance Agreement with the Town of Dryden, both dated May 31, 2019, the Town Attorney has determined in an email dated July 31, 2020 the following:

"We are able to confirm that the existing easement agreement is broad enough to cover the current upgrades at the Dominion Energy Station. Specifically Section 1(b) obligates Dominion to comply with not only the Stormwater Practices that were approved at that time but also any future "Practices". We, therefore do not see the need to execute a new easement agreement. That said, any resolutions approving the present plans may require you to record the resolution and have it referenced to the property only because the existing easement agreement references a very specific approval and very specific plans."

NOI:

1. Fill out all NOI fields. A number of the fields are blank.

Response: The missing fields have been completed.

Should you have any questions or require further information, please do not hesitate to contact Mr. Frank Canneto at (804) 335-4923 or via email at Francisco.Canneto@dominionenergy.com.

Sincerely,



Richard B. Gangle
Director Environmental Services

Enclosures (2)

- 1 – Site Development Plan
- 2 – Stormwater Pollution Prevention Plan