

APPENDIX W

Fugitive Dust Control Plan

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Fugitive Dust Control Plan

Mountain Valley Pipeline Project

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ACRONYMS AND ABBREVIATIONS

BLM	U.S. Department of the Interior, Bureau of Land Management
Certificate	Certificate of Public Convenience and Necessity
EI	Environmental Inspector
FERC	Federal Energy Regulatory Commission
FERC Plan	FERC Upland Erosion Control Revegetation and Maintenance Plan
FERC Procedures	FERC Wetland and Waterbody Construction and Mitigation Procedures
FS	U.S. Forest Service of the U.S. Department of Agriculture
JNF	Jefferson National Forest ¹
MVP	Mountain Valley Pipeline, LLC
Project	Mountain Valley Pipeline Project
Transco	Transcontinental Gas Pipe Line Company, LLC
USACE	U.S. Army Corps of Engineers
Weston and Gauley Turnpike	Weston and Gauley Bridge Turnpike Trail

¹ Jefferson National Forest refers to the southern portion of the current George Washington & Jefferson National Forests throughout this document. Originally two separate national forests, the JNF and the George Washington National Forest were administratively combined in 1995 and are administered as a single national forest unit.

Mountain Valley Pipeline Project Fugitive Dust Control Plan

1.0 INTRODUCTION

Mountain Valley Pipeline, LLC (MVP), a joint venture between EQM Midstream Partners, LP; NextEra Capital Holdings, Inc.; Con Edison Gas Midstream LLC; WGL Midstream; and RGC Midstream, LLC (collectively referred to as MVP), was issued a Certificate of Public Convenience and Necessity (Certificate) from the Federal Energy Regulatory Commission (FERC) on October 13, 2017, pursuant to Section 7(c) of the Natural Gas Act authorizing it to construct and operate the Mountain Valley Pipeline Project (Project) located in 17 counties in West Virginia and Virginia. The Project is an approximately 303-mile, 42-inch-diameter natural gas pipeline to provide timely, cost-effective access to the growing demand for natural gas for use by local distribution companies, industrial users, and power generation in the Mid-Atlantic and southeastern markets, as well as potential markets in the Appalachian region.

The pipeline extends from the existing Equitrans, L.P. transmission system and other natural gas facilities in Wetzel County, West Virginia to Transcontinental Gas Pipe Line Company, LLC's (Transco) Zone 5 compressor station 165 in Pittsylvania County, Virginia. In addition to the pipeline, the Project includes approximately 171,600 horsepower of compression at three compressor stations along the route, as well as measurement, regulation, and other ancillary facilities required for the safe and reliable operation of the pipeline. The pipeline is designed to transport up to 2.0 million dekatherms per day of natural gas.

A 3.5-mile long segment of the Project crosses portions of the Jefferson National Forest (JNF) in Monroe County in southern West Virginia and in Giles, Craig, and Montgomery counties in southwestern Virginia. The JNF is managed by the U.S. Forest Service (FS) of the U.S. Department of Agriculture. Another 60-foot segment of the Project crosses the Weston and Gauley Bridge Turnpike Trail (Weston and Gauley Turnpike) in Braxton County, West Virginia, which is administered by the U.S. Army Corps of Engineers (USACE). Approval to cross land managed by two or more federal agencies is the responsibility of the U.S. Department of the Interior, Bureau of Land Management (BLM) through issuance of a Right-of-Way Grant. Project-wide construction environmental compliance is the responsibility of the FERC. The FS and USACE will also ensure compliance across lands managed or administered by those agencies. Because the majority of federal lands crossed are managed by the FS, this plan focuses on the JNF, noting any additional or different requirements that are specific to the crossing of the Weston and Gauley Turnpike.

Construction of the Project segment that crosses the Weston and Gauley Turnpike was completed in 2018. Construction of the Project segments across the JNF began in 2018 but were not completed and progress is on hold due to a July 27, 2018, order by the U.S.

Court of Appeals for the Fourth Circuit vacating and remanding the Right-of-Way Grant and a subsequent Stop Work Order issued by FERC.

The FS is responsible for enforcement of the terms and conditions of the BLM's Right-of-Way Grant on National Forest System lands during the term of the Right-of-Way Grant for the Mountain Valley Pipeline project. Compliance will be monitored on the JNF portion of this project by the FS Project Manager and the Authorized Officer's designated compliance monitors. FS will have stop work authority per terms outlined in the BLM right-of-way grant. FS will also have stop work authority if unsafe work conditions are encountered during construction.

The Project has potential to impact sensitive environmental resources and, as a result, environmental protection measures have been developed to minimize potential impacts on these resources and will be applied, as applicable, to the Project.

2.0 BACKGROUND

Land disturbance from clearing and excavation activities has the potential to generate a large amount of dust particles. Dust control measures are practices that help reduce surface and air movement of dust from disturbed soil surfaces.

MVP has developed this Fugitive Dust Control Plan to minimize visible fugitive dust emissions at or in proximity to the worksite. Fugitive dust is generated by the mechanical disturbance of granular material exposed to air. Dust from open sources is termed "fugitive" because it is not discharged to the atmosphere in a confined flow stream. This plan outlines dust control methods to be used on the Project to reduce fugitive dust emissions and outlines the recommended records to be maintained on site during construction.

MVP does not plan to divert or withdraw water from any waterbody within the JNF for dust control.

3.0 FUGITIVE DUST EMISSION SOURCES

The following Project activities have the potential to generate fugitive dust:

- Vegetation removal;
- Clearing and grading;
- Topsoil removal;
- Cutting and filling;
- Trenching;
- Backfilling;
- Track-out onto roads;
- Bulk material loading, hauling and unloading;
- Vehicle and motorized equipment movement on unpaved access roads;
- Use of material storage piles; and
- Use of parking, staging, and storage area.

Strategic construction sequencing can greatly reduce problematic dust generation.

It is the responsibility of the Project contractor(s) and the designated Environmental Inspector(s) (EIs) to ensure that contractor personnel are complying with all dust control measures and have authority to enforce and require compliance with this plan. The Project supervisors and EIs must ensure that:

1. sources of potential dust generation are identified;
2. specific areas of Project construction will be monitored for fugitive dust generation; and
3. appropriate dust suppression techniques are implemented when dust plumes are visible.

4.0 FUGITIVE DUST CONTROL METHODS

Implementation of construction and restoration best management practices and operational controls will be used to mitigate fugitive dust emissions. The Project earth-disturbance permit will outline specific practices that control fugitive dust, including a construction sequence, use of rock construction entrances, and temporary soil stabilization methods. MVP will also implement operational controls, including the use of a reduced speed limit on unpaved access roads as well as sweeping/vacuuming paved roadways when Project-related soils are tracked out onto paved surfaces.

Wet suppression, using water, is the predominate method of suppressing fugitive dust on unpaved roads and gravel pads as it causes finer materials to adhere into larger particles. Increasing the moisture content of the finer materials may be accomplished either naturally or mechanically. Moisture content of unpaved road surfaces can be naturally increased through rainfall. Moisture content can also be increased mechanically through the application of water. The amount of water required to sufficiently control fugitive dust emissions is dependent on the characteristics of materials (e.g., surface moisture content), ambient conditions (e.g., rainfall, humidity, temperature), activities occurring in the area (e.g., vehicle traffic, vehicle weight, speeds), etc. The contractors will have one or more water trucks available per spread that will load water from approved permitted sources to spray areas for dust control. Disturbed and trafficable areas will be kept sufficiently damp during working hours in dry conditions to minimize wind-blown or traffic-generated dust emissions. Areas to be watered include, but are not limited to, the following:

- the construction corridor for the pipeline, including additional temporary workspace;
- access roads;
- aboveground facility sites;
- active grading areas;
- un-stabilized areas;
- soil stockpiles; and
- parking areas.

The frequency at which water trucks will spray construction areas will vary based on weather and site conditions. More frequent applications will be required in dry conditions and where dust generation is likely. The following actions are taken to reduce fugitive dust from construction activities.

4.1 Pipeline Construction Activities and Other Earth Disturbances

Fugitive dust emissions from vegetation removal, clearing and grading, cutting and filling, topsoil removal, trenching, backfilling and stockpile storage will be controlled to a great extent by following the construction sequencing and disturbing limited areas at a time. If sustained visible dust plumes occur, dust suppression can be achieved by applying water along the travel lane and disturbed land via water truck. In Virginia, spoil piles left undisturbed for four or more days should be temporarily stabilized with seed and mulch or tarped to prevent wind and water erosion. In West Virginia, areas at final grade should be seeded and mulched or otherwise stabilized within 7 days and areas that will not be worked again for 21 days or more must be seeded and mulched or otherwise stabilized within 7 days.

4.2 Unpaved Roads

Fugitive dust emissions generated by motorized equipment and miscellaneous vehicle traffic will be controlled by wet suppression as necessary. Fugitive dust emissions from active access roads will be controlled by periodic wetting of surfaces using a water truck. During periods of high truck traffic, road surfaces will be wetted more frequently to minimize dust emissions. Watering will occur less frequently if weather conditions (e.g., rain, frozen surfaces, etc.) are adequate to suppress dust. In addition, MVP will reduce the speed limit on the unpaved roads to control dust emissions

4.3 Paved Roads

Fugitive dust emissions from paved roads will be controlled with a combination of water trucks, power washers, sweeping and/or vacuuming, as appropriate, to minimize the amount of fugitive dust that is generated and built up on the road surfaces.

4.4 Track-out onto Roads

Track-out of loose materials will be controlled using rock construction entrances on access roads that begin at a junction with paved roads. Also, the use of sweeping and/or vacuuming will be used if any loose material goes beyond the rock construction entrances.

4.5 Deposition on Other Premises

MVP will take all appropriate actions to prevent the deposition of solid or liquid materials onto any other premises from the Project site and access roads that may cause or contribute to visible dust emissions. Preventive actions may include, but are not limited to, dust control, such as wet suppression; the operation of a sweeper truck on paved roadways equipped with water suppression; and the operation of a vacuum truck.

5.0 TACKIFIERS

The construction contractor may propose the use of tackifiers to reduce fugitive dust provided that the product to be utilized has been approved by the appropriate federal and state agencies where its application will occur. The construction contractor will detail the proposed use of any such substances in its dust control plan and provide copies of the material safety data sheets and application procedures. Typically, tackifiers used are DustFloc, RoadFloc, and Kodiak Super TACKMixes.

6.0 INSPECTION, MONITORING, AND RECORD KEEPING

The construction contractor will implement the dust control measures specified in this plan. All construction personnel will be informed of the measures in this plan. EIs will have primary responsibility for monitoring and enforcing the implementation of dust control measures by the construction contractor. The inspectors will also be responsible for ensuring that these measures are effective and proper documentation is maintained. When environmental conditions are dry, inspection of dust control measures will be conducted daily, and the EIs will be responsible for recording the following information on a daily basis:

- Weather conditions, including temperature, wind speed, and wind direction;
- Number of water trucks in use;
- Incidents where dust concentration is such that special abatement measures must be implemented;
- Condition of soils (damp, crusted, unstable, other) on the right-of-way and other construction sites;
- Condition of soils (damp, crusted, unstable, other) on access roads;
- Condition of track-out pads; and
- Overall status of dust control compliance.

This information will be incorporated into the EI's daily report.

7.0 PLAN MAINTENANCE

A copy of this Fugitive Dust Control Plan will be retained at the spread's job site office and will be made available to the federal and state agencies upon request.

8.0 STAFF TRAINING

Prior to the start of construction, MVP will conduct environmental and safety training for MVP and contractor personnel. The training program will focus on the Federal Energy Regulatory Commission's *Upland Erosion Control, Revegetation, and Maintenance Plan* (FERC Plan) and *Wetland and Waterbody Construction and Mitigation Procedures* (FERC Procedures); other construction, restoration, and mitigation plans, including this *Dust Control Plan*; and applicable permit conditions. In addition, MVP will provide large-group training sessions before each work crew begins construction with periodic follow-up training for groups of newly assigned personnel.