



Mountain Valley Pipeline Project – Spread H

Environmental Auditor Quarterly Report for Q3 2021

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Environmental Auditor Contact Information

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I. Introduction

The Spread H (portions of Construction Spreads 9 and 10) portion of the Mountain Valley Pipeline Project H-600 (Project) within the state of Virginia begins at approximate station 12001+80 in Montgomery County and ends at approximate station 13415+51 in Franklin County. The Spread H Project includes right of way for the pipeline, laydown yards, additional temporary workspaces (ATWS) and temporary/permanent access roads. Spread H is located in Montgomery, Roanoke, and Franklin Counties.

As required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity, Mountain Valley Pipeline, LLC (MVP) has developed Annual Standards and Specifications to identify means and methods for controlling erosion and sediment during construction and post construction. MVP currently has inspection staff requirements on the Spread H Project to include a Lead Environmental Inspector (LEI) and a staff of Environmental Inspectors (EIs). The LEI/EIs obtained the Virginia DEQ (VADEQ) ESC/SWM Inspector Certifications. In addition to these Certifications, the LEI also obtained the VADEQ Program Administrator Certification. The MVP Environmental inspection staff is responsible for conducting routine daily inspections and inspecting all temporary BMPs every four business days per the Storm Water Pollution Prevention Plan (SWPPP) requirements to ensure environmental compliance. These inspections are documented via Visual Site Inspection Reports (VSIRs) and internal/external communication to ensure the repair of all ineffective temporary ESC measures within 24 hours of identification, or as soon as conditions allow if compliance within this time frame would result in greater environmental impacts (provided the VADEQ concurs). Temporary ESC measures that are still effective but found to be in need of routine maintenance must be maintained within three days unless an extension is granted by VADEQ.

The Spread H EIs currently conduct inspections for the following geographical locations:

- Montgomery, Roanoke and Franklin Counties
 - 12005+00-12544+06
 - 12600+00-13141+65
 - 13141+65-13422+00
 - PY-006
 - LY-049

Inspections did not occur from July 1, 2021 through September 30, 2021, between approximate stations 12544+06-12600+70 as earth disturbance activities have not commenced within these locations.

Forward construction progress occurred/continued during this reporting period at the following locations:

- 12215+50-12234+50 (previously graded)
- 12281+00-12291+70 (previously graded)
- 12464+45-12505+00 (previously graded)
- 12600+70-12638+00 (new grade)
- 12691+05-12715+80
- 12715+80-12744+00
- 12744+00-12763+27 (new grade)
- 12763+27-12776+82
- 12776+82-12796+62
- 12870+00-12937+00 (new grade)
- 13122+00-13145+90
- 13145+90-13159+20 (new grade)
- 13159+20-13195+15
- 13198+60-13210+00 (previously cleared, new grade)

The following portions of the right of way have been permanently restored via final grading and permanent stabilization per the approved Standard and Specification Details and the ESC/Post Construction SWM Plans:

- 12009+00-12011+63; 12113+00-12115+00
- 12145+50-12147+50; 12147+50-12152+00
- 12212+00-12216+00; 12235+00-12281+00
- 12999+30-13022+00; 13044+00-13057+00
- 13058+93-13061+40; 13063+96-13115+00
- 13213+00-13260+00; 13262+58-13316+00

II. Information Reviewed to Prepare Quarterly Report

The Environmental Auditor utilized the following resources to assist with evaluating project compliance from July 1, 2021 through September 30, 2021 (end of reporting period for Q3 2021):

- MVP Daily Punch Lists (includes VADEQ findings);
- Environmental Auditor Bi-Weekly Reports;
- Weekly meetings with MVP staff and the Lead Environmental Inspectors (LEIs);
- Stormwater Pollution Prevention Plan VSIRs;
- Spread H LEI Spread Pipe Line Workbook and Progress Tracker Spreadsheets;
- Project Rain Gauge Data;
- Spread H Scatter Sheets (Contractor Available Resources and Daily Work Locations);
- Annual Project Specific Standards and Specifications;
- Oil Discharge Contingency Plan (ODPC) Inspection Reports;
- Storm Water Pollution Prevention Plans (SWPPPs), Erosion and Sediment Control (ESC) Plans and Post Construction Stormwater Management (SWM) Plans;
- Off Right of Way Sediment Impact Tracker Spreadsheet;
- Agency Compliance Forms (Problem Areas Reports and Noncompliance Reports);
- Third party complaint submitted to the VADEQ on July 14, 2021;
- Third party complaint submitted to the VADEQ on July 27, 2021;
- Third party complaint submitted to the VADEQ on August 6, 2021
- Third party complaint submitted to the VADEQ on August 14, 2021;
- Third party complaint submitted to the FERC and filed on August 23, 2021;
- VADEQ Pollution Incident Report #300801 dated September 2, 2021;
- Third party complaint submitted to the VADEQ on September 21, 2021; and
- VADEQ Pollution Incident Report #301005 dated September 23, 2021

The Environmental Auditor also relied on assistance and information from the MVP staff, MVP Chief Environmental Inspector, MVP Spread H Environmental inspection staff, contractor (Environmental and Construction staff), Geotechnical staff and the Tetra Tech Civil Engineering and Construction Management Departments.

The following sections III. through VI. provide an overall summary from July 1, 2021 through September 30, 2021 (Q3 reporting period). **Please refer to the attached Environmental Auditor Bi-Weekly Reports for further detailed information.**

III. Quarterly Summary of Environmental Inspector Observations

Per Table H-1A, the Environmental Inspectors observed a total of 316 daily punchlist items (includes Carry Over items from previous Bi-Weekly Reports) requiring repair/maintenance throughout the Q3 reporting period. During this reporting period, the Environmental Auditor noted one item identified by the EI as ESC measures damaged due to impacts caused by third party activities related to livestock traffic. The ESC measures were subsequently repaired/maintained within the required timeframe and no resources were impacted.

During the Q3 reporting period, the Spread H Environmental inspection staff identified 32 off right of way impacts in upland areas. Thirty-one of the impacts were caused by runoff events on 7/12/2021, 8/12/2021, 8/16/2021, 8/18/2021, 8/20/2021, and 9/22/2021. Three of the identified impacts identified on 8/20/2021 resulted in impacts to environmental resources. A voluntary temporary suspension of construction activities related to forward progress was implemented by MVP on 8/16/2021 from approximate stations 13116+00 to 13213+00. During this timeframe construction crews focused on addressing ESC measures impacted by the storm events. Prior to resuming forward progress covered by the temporary suspension of work, the Spread H Construction Management staff is required to submit an authorization request to MVP for review and approval and a DEQ follow up inspection. Additional ESC enhancements and BMP measures related to open trench construction were developed by MVP. Please note that the remaining off right of way impact was caused by rock and soil overburden material migrating off right of way during blasting activity on 8/13/2021 and is discussed below.

The majority of off right of way impacts were caused by high intensity/short duration storm events which included remnants of Tropical Storm Fred and Hurricane Ida. **Refer to rainfall discussion/Table H-1B below.** The storm events caused ESC measures to become overwhelmed resulting in the following:

July 2021

- One off right of way sediment impact was identified on 7/12/2021. The sediment traveled approximately 20 feet off right of way within an upland area. A high intensity/short duration rainfall event caused sediment controls to become overwhelmed. The ESC measures were repaired/maintained. This item received an indefinite extension request approval as this location did not receive landowner approval and the off right of way issue has not been resolved as a result of the restricted access. An Agency Compliance Form (Problem Area Report #641) was submitted by the Spread H Environmental inspection staff. No resources were impacted.

August 2021

- Two off right of way sediment impacts were identified on 8/12/2021. The sediment/access road gravel traveled approximately 40 and 15 feet off right of way within upland areas, respectively. A high intensity/short duration rainfall event caused sediment controls to become overwhelmed. The ESC measures were repaired/maintained, landowner access granted, off right of way sediment clean up and stabilization occurred within the required timeframe. An Agency Compliance Form (Problem Area Report #647) was submitted by the EI on 8/13/2021. No resources were impacted.

- Eleven off right of way sediment impacts were identified on 8/16/2021. The sediment traveled approximately 50, 700, 15, 10, 3, 5, 2, 225, 6, 1, and 5 feet off right of way within upland areas. Heavy storm events with intervals of high intensity/short duration rainfall caused sediment controls to become overwhelmed. The ESC measures were repaired/maintained and enhanced within the required timeframes via multiple extension request approvals from the VADEQ. Due to the saturated conditions coupled with the severity of the slope where the 700 feet off right of way impact occurred, temporary ESC measures were initially installed until final re-installation of the ESC measures was completed. Landowner access was granted, off right of way sediment clean up occurred and the off right of way areas were stabilized at 10 of the identified locations within the required timeframes via extension request approvals. The remaining item received an indefinite extension request approval from the VADEQ and is awaiting landowner permission. Agency Compliance Forms (Problem Area Reports #654, #656, #657, #659, #660, and #662) were submitted by the EI on 8/16/2021. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event. No resources were impacted.
- Two off right of way sediment impacts were identified on 8/18/2021. The sediment traveled approximately 25 and 50 feet off right of way within upland areas. A high intensity/short duration rainfall event (remnants of Tropical Storm Fred) caused sediment controls to become overwhelmed. The ESC measures were repaired/maintained, landowner access granted, off right of way sediment clean up and stabilization occurred at one of the locations within the required timeframe. The remaining item received an indefinite extension request approval from the VADEQ and is awaiting landowner permission. Agency Compliance Forms (Problem Area Reports #666 and #668) were submitted by the Spread H LEI on 8/18/2021. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event. No resources were impacted.
- Twelve off right of way sediment impacts were identified within upland areas on 8/20/2021. The sediment traveled approximately 4, 80, 4, 10, 4, 10, 8, 3, 20, 10, 100, and 15 feet off right of way within upland areas. Storm events with intervals of high intensity/short duration rainfall caused sediment controls to become overwhelmed. The ESC measures were repaired/maintained at all 12 locations. Landowner access was granted, and off right of way sediment clean up and stabilization occurred at three of the upland locations within the required timeframes via extension request approvals. The remaining 9 items received indefinite extension request approvals from the VADEQ and are awaiting landowner permission. Agency Compliance Forms (Problem Area Reports #669, #670, #671, #673, #674, #675, #676, and #677) were submitted by the Spread H LEI on 8/20/2021. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event. The Environmental Auditor observed a location where an ESC measure was not installed prior to this rainfall event which contributed to the off right of way sediment impact that traveled 80 feet subsequently impacting an environmental resource (S-IJ12/W-MN7). **Refer to Sections VI. and VII below for further discussion.**

Three environmental resources were subsequently impacted by this event (S-IJ12/W-MN7, W-EF45, and W-EF17):

The off right of way impact which traveled approximately 80 feet resulted in an environmental resource impact at S-IJ12/W-MN7. During the evaluation the Environmental Auditor observed the impact to S-IJ12/W-MN7 appeared to be minor staining. Based on communication with the Spread H LEI, the VADEQ conducted an inspection on 9/21/2021 and observed no visible impacts to S-IJ12/W-MN7. The ESC measures above this environmental resource were repaired/maintained and enhanced. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event.

The off right of way impact which traveled approximately 100 feet resulted in an environmental resource impact at W-EF45. The ESC measures were repaired/maintained and enhanced. This item received an indefinite extension request approval from the VADEQ and is awaiting landowner permission. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event.

The off right of way impact at W-EF17 occurred when heavy runoff traveled down an adjacent landowner access road and combined with runoff from the project access road. Scouring occurred at an existing culvert resulting in gravel depositing 5 feet off the access road within the wetland. The ESC measures were repaired/maintained and enhanced, landowner access granted, off right of way sediment clean up, and stabilization occurred within the required timeframe. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event.

September 2021

- Three off right of way sediment impacts were identified on 9/22/2021. These locations were combined into one punchlist item due to upslope ESC measures becoming overwhelmed during a slope failure and impacting one general area. The sediment traveled approximately 1500 feet off right of way within an upland area. A prolonged storm event with intervals of high intensity/short duration rainfall caused sediment controls to become overwhelmed over an approximate 700 feet stretch of slope above the impacted locations. Temporary ESC measures have been installed and multiple extension requests have been approved by the VADEQ due to wet conditions. Grading and ESC measure re-installation activities continue. An Agency Compliance Form (Problem Area Report #688) was submitted by the EI on 9/22/2021. Landowner access was granted and off right of way sediment removal and stabilization continues via multiple extension request approvals from the VADEQ.

The Spread H Environmental inspection staff observed one off right of way impact caused by blasting activities on 8/13/2021. The off right of way overburden impact occurred within an upland area and was caused by rock and soil material migrating off right of way during blasting activity. The material travelled approximately 10-20 feet off right of way. Landowner approval has not been granted to retrieve the rock and soil material and conduct stabilization activities. This item has been extended indefinitely by the VADEQ until landowner approval is granted.

During the Q3 reporting period all items provided on the punchlist were communicated to the contractor environmental staff and addressed within the VADEQ approved timeframe (24 hours/Three Days or as extended by VADEQ authorization). **Refer to rainfall discussion, Sections IV., VI. and VII. below for further discussions.**

Based on the MVP Punchlist data and the Environmental Auditor's Bi-Weekly Reports, the following Table H-1A provides a summary of maintenance/repair items identified by the Environmental Inspectors throughout the Q3 reporting period:

Table H-1A

Spread H Environmental Inspector Observations: July 1, 2021 – September 30, 2021					
Monthly Observation	Total Number Observations	Environmental Resource Impact	Off Right of Way Impact	Right of Way Impacts Caused by Third Parties	Weather Related Damage
July 2021	*41	0	1	1	0
August 2021	*134	3	28	0	0
September 2021	*141	0	3	0	0

* Includes Carry Over Items

The EIs conducted a total of 181 SWPPP inspections and provided respective VSIRs throughout the reporting period. Upon review of the SWPPP VSIRs, it appears that the EIs' observations were communicated to the contractor and noted issues were maintained/repared within the same day or within the VADEQ approved timeframe (24 Hours/Three Days or as extended by VADEQ authorization).

The MVP ODCP inspectors conducted weekly site inspections at Laydown Yard PY-006 from July 1, 2021 through September 30, 2021. Twenty-seven inspections were conducted in July, twenty-five inspections were conducted in August and twenty-six inspections were conducted in September. A minor spill near the primary tank in the Contractor yard was observed by the ODCP inspector on 7/6/2021. The contractor was notified and the spill was cleaned up immediately. The ODCP inspector documented the spill cleanup in the 7/6/2021 report photo log. One ODCP inspection was not conducted on August 11, 2021.

An approximate total of 27 recordable precipitation events occurred during the Q3 reporting period. Several events produced high intensity/short duration rainfall events which included remnants of Tropical Storm Fred (8/17/2021) and Hurricane Ida (8/31/2021 through 9/1/2021) resulting in heavy runoff that caused ESC measures to become overwhelmed. **Refer to the discussion above for detailed information pertaining to the corrective action measures and Agency Compliance Forms submitted for the off right of way and environmental resource impacts.** The following dates identify the approximate precipitation data related to the corresponding off right of way and environmental resource impacts:

July 2021

- A rainfall event with intervals of high intensity/short duration storm events occurred overnight on 7/10/2021 producing approximately 1.5 inches in 8.5 hours. One off right of way impact resulted from gravel displaced from an access road was observed on 7/12/2021.

August 2021

- A high intensity/short duration storm event occurred during the afternoon of 8/12/2021 producing approximately 1.7 inches in 40 minutes. Two off right of way sediment/gravel impacts were identified by the EI following the storm event.
- Heavy storm events with intervals of high intensity/short duration rainfall occurred overnight on 8/15/2021 producing approximately 3.9 inches in 2.5 hours. Eleven off right of way impacts were observed by the EIs on 8/16/2021.
- During the overnight hours of 8/17/2021, high intensity/short duration storm events (remnants of Tropical Storm Fred) produced approximately 1.2 to 2.4-inches in two hours. Two off right of way sediment/gravel impacts were identified by the EIs on 8/18/2021.
- Isolated high intensity/short duration storm events occurred late 8/19/2021 and produced approximately 0.8 to 1.9 inches in 1.2 hours. Twelve off right of way impacts and three environmental resource impacts (S-IJ12/W-MN7, W-EF45, and W-EF17) were identified by the EIs on 8/20/2021.

September 2021

- A prolonged storm event with intervals of high intensity/short duration rainfall began on 9/21/2021 through 9/22/2021 and produced approximately 4.9 inches in 23 hours. Three off right of way impacts were identified by the EI on 9/22/2021.

Based on rainfall gauge data provided by the Spread H EIs, the following Table H-1B provides a summary of monthly recorded rainfall dates, amounts based on lowest to highest rates, and estimated duration for each event throughout the Q3 reporting period:

Table H-1B

Spread H Rainfall and Duration Rates: July 1, 2021 – September 30, 2021					
July		August		September	
Date Recorded	Rainfall and Approximate Duration	Date Recorded	Rainfall and Approximate Duration	Date Recorded	Rainfall and Approximate Duration
7/1/2021	0.0"-0.2" – 1.5 Hours	8/2/2021	0.0"-0.2" – 2 Hours *Rainfall occurred on 8/1/2021	9/1/2021	0.5"-2.3" – 11.7 Hours *Isolated high intensity/short duration storm events occurred on 8/31/2021 *Remnants of Hurricane Ida
7/2/2021	1.0"-2.5" – 19.5 Hours *Intervals of high intensity/short duration storm events began on 7/1/2021	8/12/2021	0.0"-0.2" – 1.5 Hours *Rainfall occurred on 8/11/2021	9/2/2021	0.3"-0.8" – 5.3 Hours *Rainfall continued through 9/1/2021 *Remnants of Hurricane Ida
7/8/2021	0.0"-0.4" – 1.25 Hours *Rainfall occurred on 7/7/2021	8/13/2021	0.0"-1.5" – 4 Hours *Isolated high intensity/short duration storm events occurred on 8/12/2021	9/9/2021	0.0"-0.2" – 1 Hour
7/9/2021	0.5"-1.4" – 4.75 Hours *High intensity/short duration storm events occurred on 7/8/2021	8/14/2021	0.0"-1.0" – 15 Hours *Isolated high intensity/short duration storm events occurred on 8/13/2021	9/20/2021	0.0"-0.6" – 3 Hours
7/11/2021	0.3"-1.8" – 8.7 Hours *Rainfall occurred on 7/10/2021	8/15/2021	0.0"-1.0" – 7 Hours *Rainfall occurred from late 8/14/2021-8/15/2021	9/22/2021	2.3"-4.9" – 23 Hours *Rainfall with intervals of high intensity/short duration events began on 9/21/2021
7/15/2021	0.0"-0.3" – 1 Hour *Rainfall occurred on 7/14/2021	8/16/2021	0.6"-4.2" – 9 Hours *Isolated high intensity/short duration storm events occurred from late 8/15/2021 through early 8/16/2021	9/23/2021	0.3"-2.1" – 11 Hours *Rainfall continued from 9/21/2021
7/19/2021	0.0"-0.3" – 1.5 Hours	8/17/2021	0.0"-0.6" – 3.25 Hours *Rainfall occurred on 8/16/2021		
7/26/2021	0.0"-0.1" – 1.5 Hour *Rainfall occurred on 7/24/2021	8/18/2021	0.5"-1.6" – 16 Hours *Rainfall occurred from late 8/17/2021 through 8/18/2021 *Remnants of Tropical Storm Fred		
		8/20/2021	0.1"-1.9" – 2 Hours *Isolated high intensity/short duration storm events occurred on 8/19/2021		
		8/25/2021	0.0"-0.6" – 25 Minutes *Isolated high intensity/short duration storm event		
		8/27/2021	0.0"-0.3" – 1 Hour *Rainfall occurred on 8/26/2021		
		8/28/2021	0.0"-0.5" - .5 Hours *Rainfall occurred on 8/27/2021		
		8/30/2021	0.1"-1.8" – 3 Hours *Isolated high intensity/short duration storm events occurred on 8/29/2021		

IV. Quarterly Summary of VADEQ Observations

Per Table H-1C, the VADEQ Inspectors observed a total of 77 items requiring repair/maintenance throughout the Q3 reporting period. During this reporting period, the Environmental Auditor noted one item identified by the VADEQ as weather related damage to ESC measures due to a fallen tree from a storm event. All items provided on the punchlist for the reporting period were communicated to the contractor staff and addressed within the VADEQ approved timeframe (24 hours/Three Days or as extended by VADEQ authorization). It should be noted that several VADEQ observations were redundant (after the fact) with the same observations previously noted by the Environmental Inspectors. **Refer to Table H-1C and the respective Bi-Weekly Reports for further detailed information.**

During the Q3 reporting period, the VADEQ identified one off right of way sediment impact in an upland location on 8/20/2021. It should be noted that the off right of way impact was a redundant observation as this impact was initially observed and documented by the respective EI. The ESC measures were repaired/maintained and enhance. An indefinite extension request approval was granted by the VADEQ until landowner permission is granted to access the off right of way impact. **Refer to Table H-1C and the respective Bi-Weekly Reports for further detailed information.**

During the Q3 reporting period the ESC measures identified on the punchlist by the VADEQ were communicated by the Spread H Environmental staff to the contractor staff and addressed within the required timeframes including extension requests approved by the VADEQ. The VADEQ conducted follow up inspections based on landowner/third party complaints and observed no impacts to S-EF44/W-EF44 and S-IJ12/W-MN7. The VADEQ conducted a site inspection and observed no off right of way sediment impacts (which included S-EF20A). The ESC measures were observed to be installed and functional except of one location where sediment control measures required maintenance. The VADEQ noted that the repairs were conducted immediately on the day of their inspection. **Refer to Section III., Section V., and Section VI. for additional information.**

Based on the MVP Punchlist data and the Environmental Auditor's Bi-Weekly Reports, the following Table H-1C provides a summary of maintenance/repair items identified by the VADEQ Inspectors throughout the Q3 reporting period:

Table H-1C

Spread H VADEQ Observations: July 1, 2021 – September 30, 2021					
Monthly Observation	Total Number Observations	Environmental Resource Impact	Off Right of Way Impact	Right of Way Impacts Caused by Third Parties	Weather Related Damage
July 2021	24	0	0	0	1
August 2021	**34	0	**1	0	0
September 2021	19	0	0	0	0

** Includes redundant items initially identified by the EI. Refer to the Bi-Weekly Reports for further details.

V. Quarterly Summary of Landowner/Third Party Issues

- A third party complaint was submitted to the VADEQ on July 14, 2021 (IR #300189). The complainant cited "muddy runoff pumped from MVP trenching" from the "MVP trenching site in a field at the intersection of Dillons Mill and Adney Gap Road". Based on communication with the Spread H Environmental Inspection staff, the complainant entered the landowner's property on an all-terrain vehicle (ATV) adjacent to the MVP right of way. The Environmental Inspection staff compiled documentation which included photos depicting rutting caused by the complainant's vehicle and the complainant driving the ATV through the North Fork Blackwater River (S-D8). Dewatering activities were occurring on the right of way on July 14, 2021. Erosion and sediment control measures, which were enhanced were proper installed and functional. The VADEQ conducted an inspection on July 15, 2021 and per a Complaint Investigation Report (CIR) observed no off right of way impacts and the ESC measures installed/implemented and properly maintained per the approved ESC and SWM plans. The Environmental Auditor evaluated the

dewatering structure on July 20, 2021. The structure was not operational at the time of the evaluation; however, it appeared to be properly installed and functional. The right of way was fully vegetated and the current construction activities were approximately 1,300 feet west of the stream location. Erosion and sediment control measures were observed to be installed and functional where construction activities were occurring at the time of the evaluation.

- A third party complaint was submitted to the VADEQ on July 27, 2021. The report narrative alleges areas of "seeding of disturbed areas in the MVP right-of-way has not met minimum cover requirements". Photo documentation within the report (photos taken July 14, 2021) notes "areas of the right of way that are not adequately covered with vegetation". The photo log which serves as the basis for the report was developed via aerial photos taken from a manned aircraft. The Spread H Environmental Inspection staff continues to conduct daily inspections in addition to the required SWPPP inspections. The ESC measures throughout the right of way are repaired/maintained and enhanced as needed based on daily punch lists. The Environmental Auditor conducted evaluations throughout portions of the locations noted in the Complainant report and observed areas where stabilization meets coverage requirements along with isolated locations where vegetation has not been fully established and restabilization will need to occur. The ESC measures throughout the evaluated areas appeared to be installed and functional with no off right of way or resource impacts noted. The Environmental Auditor and the Spread H/MVP Environmental staff continue to communicate and recommendations are provided by the Environmental Auditor based on observations noted during the evaluations.
- A third party complaint was submitted to the VADEQ on August 6, 2021. The introduction of the complaint cites that the "report includes photos from Franklin County, VA starting near Wirtz south of Route 220". However, the photos and noted Mileposts were actually located in Montgomery County. The complainant alleges areas of "seeding of disturbed areas in the MVP right-of-way has not met minimum cover requirements". Photo documentation within the report (corresponding photos taken November 2020 and July 2021) notes "areas of the right of way that are not adequately covered with vegetation". The photo log which serves as the basis for the report was developed via aerial photos taken from a manned aircraft. The Spread H Environmental Inspection staff continues to conduct daily inspections in addition to the required SWPPP inspections.

The ESC measures throughout the right of way are repaired/maintained and enhanced as needed based on daily punch lists and the required SWPPP inspections. The Environmental Auditor reviews SWPPP Inspection Reports and Daily Punchlists which address temporary and permanent vegetative stabilization conditions throughout the right of way. The ESC measures, which include soil stabilization blanket, straw mulch and temporary seeding, throughout the evaluated areas are installed and maintained as necessary and no off right of way or resource impacts have been noted during this timeframe. The Environmental Auditor and the Spread H/MVP Environmental staff continue to communicate and recommendations are provided by the Environmental Auditor based on observations noted during the evaluations.

- A third party complaint was submitted to the VADEQ on August 14, 2021. A Pollution Incident Summary Report (IR #300568) was generated by the VADEQ. The complainant alleged that the contractor was "actively running heavy digging equipment through a stream". Based on communication with the Spread H Environmental Inspection staff a site inspection was conducted on 8/14/2021 and no construction equipment operated within the stream. The VADEQ conducted an inspection on 8/16/2021 and did not observe any impacts to the stream. The Environmental Auditor conducted a follow up inspection on 8/19/2021 and did not observe any impacts to the stream.

- A third party complaint was submitted to the FERC and filed on August 23, 2021. The complainant cited an "excavator in stream" and the "MVP's rushed and aggressive construction has and will continue to cause immediate and long-term effects, in addition to cumulative impacts to groundwater, streams, wetlands". The complainant specifically cites S-EF44/W-EF44 and W-EF45 as resources impacted by the project.

Based on communication with the Spread H Environmental Inspection staff a site inspection was conducted on 8/14/2021 by the Spread H EI and on 8/16/2021 by the VADEQ. Both inspections observed no construction equipment operated within S-EF44/W-EF44. The Environmental Auditor conducted a follow up inspection on 8/19/2021 and did not observe any impacts to the stream. On 8/20/2021 a high intensity/short duration storm event produced approximately 1.9 inches in 1.2 hours resulting in an off right of way sediment impact to W-EF45. The ESC measures were repaired/maintained and enhanced on 8/21/2021 and the Environmental Auditor evaluated this location on 8/25/2021 and provided additional recommendations. The off right of way sediment (approximately 1 cubic yard) has not been retrieved due to restricted access and awaiting landowner permission. The MVP Environmental Inspection staff continues to conduct daily inspections and required SWPPP inspections. The Environmental Auditor continues to conduct site evaluations and notes communication between the Environmental Inspection staff and the contractor.

- A third party complaint from a Soil and Water Conservation District Director was submitted to the VA DEQ on 9/2/2021 (Pollution Incident Detail #300801). The complainant alleges "multiple failures of erosion and sediment controls". Per the Closure section of the PID #30081 dated 9/7/2021, the VADEQ conducted a site inspection and observed no off right of way sediment impacts (which included S-EF20A). The ESC measures were observed to be installed and functional except of one location where sediment control measures required maintenance. The VADEQ noted that the repairs were conducted immediately on the day of their inspection. The Environmental Auditor conducted an evaluation on 9/27/2021 and observed the ESC measures to be installed and functional with no impacts to environmental resources at the time of the evaluation.
- A third party complaint was drafted and submitted on 9/8/2021 to Roanoke County regarding ponding on Honeysuckle Road. On 9/9/2021 the Roanoke County staff inspected the area and alleged that a "berm had been created" as "part of the MVP Project" and "not letting the water effectively dissipate." The Environmental Auditor observed no berm was constructed related to the MVP project and ponded water not present due to continued road maintenance by the MVP contractor.
- A third party complaint was submitted to the VADEQ on behalf of a landowner. The undated report which was received by MVP on 9/21/2021 alleges "continuing problems" related to "Stormwater runoff from the right of way". The complainant's narratives affiliated with the photo log provide incorrect information regarding the right of way topography, drainage and functionality of the installed ESC measures. The off right of way property to the north (not fully shown within the complainant's report) is currently in grassed conditions and void of forested conditions which appear to be a result of previous logging activities. This location drains directly to the west into the landowner's existing disturbed road which runs parallel to the right of way. This existing landowner access road (not part of the MVP project) appears to have been graded in a cut condition and remains in a disturbed condition per previous site evaluations. The project right of way is currently stabilized with soil stabilization blanket (SSB)/vegetation, temporary waterbars, and permanent waterbars/end treatments. The Environmental Auditor observed no off right of way stormwater-related impacts from the right of way at the time of the evaluation.
- A landowner complaint was submitted to the VA DEQ on 9/23/2021 (IR #301005). The complainant alleged that erosion and sediment was leaving the MVP right of way on her property. The Spread H EI and the VA DEQ conducted an inspection on 9/24/2021 and did not observe

any off right of way impacts. Another inspection was conducted on 9/28/2021 by representatives from the ACOE and DEQ and no resources appeared to be impacted during the inspection. The ESC measures were observed to be installed and functional at the time of the inspection. The Environmental Auditor continues to evaluate this area of the right of way and communicates with the Spread H Environmental Inspection staff.

VI. Quarterly Summary of Environmental Auditor Observations and Recommendations

Per Table H-1D, the Environmental Auditor conducted 63 site evaluations during the Q3 reporting period and observed locations where ESC measures required proper installation, repair/maintenance or additional (enhanced) ESC measures be installed as necessary to minimize erosion and sediment impacts. During the reporting period, the Environmental Auditor evaluated the ESC and PCSM measures throughout the project for proper installation and functionality. The Environmental Auditor communicated observations and recommendations with the Spread H Environmental Inspection staff, contractor staff and MVP Environmental staff (includes the Chief EI). Repair/maintenance items and recommendations were forwarded to the Spread H LEI and addressed. The recommendations provided by the Environmental Auditor to install enhanced ESC measures pertained to runoff control, erosion control, and sediment control Best Management Practices (BMPS). The Environmental Auditor provided recommendations to install additional enhanced ESC measures and assisted the MVP Environmental staff with the development of ESC enhancements and BMP measures related to open trench construction to minimize erosion and sediment impacts during heavy runoff events. The Spread H Environmental Inspection staff, contractor Environmental staff, Chief EI, and Environmental Auditor continue to monitor locations throughout the right of way and communicate/coordinate to implement enhanced ESC measures as necessary.

The Environmental Auditor evaluated areas of the project where off right of way impacts occurred throughout the Q3 reporting period. At the time of the evaluations the Environmental Auditor noted the ESC measures were repaired/maintained and enhanced. However, on August 20, 2021 the Environmental Auditor conducted a post rainfall event evaluation at MVP-RO-286 (CIS) and observed that an ESC measure was not installed at approximate station 12893+00. This location experienced a high intensity/short duration storm event late 8/19/2021 which resulted in an off right of way and environmental resource impact. The Environmental Auditor observed that a waterbar end sump was overwhelmed at approximate station 12895+00 and subsequently caused an off right of way/resource impact. Upon further assessment the Environmental Auditor observed that a waterbar was not installed at approximate station 12893+00 (upslope of approximate station 12895+00) per the approved ESC plans and contributed to the off right of way impacts which includes S-IJ12/W-MN7. The Environmental Auditor communicated with the Spread H Environmental Inspection staff and recommended installing the waterbar per the required ESC plans. The Environmental Auditor conducted a follow up evaluation on September 10, 2021 and observed the waterbar properly installed with enhanced ESC measures and functional.

The Environmental Auditor continues to communicate with the Spread H Environmental Inspection staff, MVP Environmental staff (including the Chief EI), and contractor staff on a continued basis. Discussions entail project feedback and recommendations/guidance to maintain compliance.

The following Table H-1D provides a summary of the monthly total number of observations (site evaluations) conducted by the Environmental Auditor throughout the Q3 reporting period.

Table H-1D

Environmental Auditor Field Observations: July 1, 2021 – September 30, 2021	
Month	Total Observations
July 2021	17
August 2021	23
September 2021	23

VII. Conclusion(s)

Per Section IV. (b) (1) of the Consent Decree, the Environmental Auditor conducted site evaluations, evaluated Daily Punchlists, VSIR/SWPPP reports, communicated with the Spread H Environmental Inspection staff, Chief EI, and the MVP Environmental staff, and has concluded the following for the Spread H Project:

- The Best Management Practices for the Project have been implemented in accordance with MVP's Annual Standards and Specifications, erosion and sediment control plans and stormwater management plans;
- The temporary ESC measures were properly installed, inspected, and maintained; however, the environmental auditor conducted a site evaluation on August 20, 2021 following a high intensity short duration storm event which resulted in an off right of way and resource impact. The Environmental Auditor observed an ESC measure not installed per the approved ESC Plans which appeared to result in the off right of way impacts; and
- All ineffective temporary E&SC measures observed by the Environmental Inspectors/Environmental Auditor were repaired and ESC measures in need of routine maintenance were maintained within the timeframes required by MVP's Annual Standards and Specifications or as otherwise provided in the Consent Decree.

Based on the aforementioned observations, the resources available and deployed in the field, including EIs and the construction contractor, were sufficient to regularly and consistently conduct routine maintenance and/or repair ineffective ESC measures in a timely manner throughout the Q3 reporting period. The Environmental Auditor recommends continued communication between the MVP Environmental inspection staff and the contractor to ensure all ESC measures are properly installed and functional prior to an upcoming precipitation event to ensure compliance will be maintained with the approved Annual Standards and Specifications.

In accordance with Section IV.a of the Consent Decree, the Environmental Auditor concludes that all alleged instances of non-compliance with MVP's Annual Standards and Specifications, MVP's Site-Specific ESC and SWM Plans, and Clean Water Act Section 401 Water Quality Certification No. 17.001 addressed in the Consent Decree that are within MVP's power to correct have been corrected. As DEQ is aware, there are instances noted in the Q4 2019 through Q2 2021 Reports in which sediment has left the ROW but MVP's requests for landowner permission to take corrective measures have been denied.

Report Period Ending: 7/11/2021
 Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 27 conducted from 6/28/2021 through 7/11/2021 (includes PY-006)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 6/28/2021 through 7/11/2021 (includes Carry Over Items from 6/27/2021): 19											
Total Number of ODCP Inspections at Laydown Yard PY-006: 6 (6/28/2021 through 7/3/2021); 6 (7/5/2021 through 7/10/2021) A minor spill near the primary tank in the Contractor yard was observed by the ODCP inspector on 7/6/2021. The contractor was notified and the spill was cleaned up immediately. The ODCP inspector documented the spill clean up in the 7/6/2021 report photo log.											
Total Number of VADEQ Observations from 6/28/2021 through 7/11/2021: 3											
Total Number of Landowner/Third Party Reported Complaints: 0											
Total Number of Right of Way Impacts Caused by Third Parties: 0											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): 0											
Total Number of Off Right of Way Impacts: 0											
Total Number of Environmental Resource Impacts: 0											
Total Number of ESC Measures in Need of Routine Maintenance Not Maintained Within Timeframes Required by MVP's Annual Standards and Specifications or as Otherwise Provided in the Consent Decree: 0											
Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 6/28/2021 through 7/11/2021.											
CARRY OVER ITEMS FROM 6/27/2021											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
11/12/2020	2.4"-4.0" - 22 Hours *Remnants of Hurricane Eta continuing from 11/11/2020	1					1	1 on 11/12, 11/18, 11/25, 12/9/, 12/17, 12/23, 12/30/2020, 1/6/, 1/13, 1/20, 1/27, 2/3/, 2/10, 2/17, 2/24, 3/10, 3/17, 3/23, 3/31, 4/7, 4/13, 4/21, 4/28, 5/5, 5/12, 5/19, 6/2, 6/9 and 6/16/2021 to be completed on 7/17/2021			Engineering design being prepared for slide impact area. A long term extension approval has been granted.
ENVIRONMENTAL INSPECTOR OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
6/28/2021		2					2			1 on 6/28/2021 1 on 6/29/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
6/29/2021		3					3		1 on 6/30/2021	2 on 6/30/2021	Three items were identified requiring repair/maintenance and completed within the required timeframe.
7/2/2021	1.0"-2.5" - 19 Hours *Rainfall began on 7/1/2021	9					9		3 on 7/2/2021	4 on 7/2/2021 2 on 7/3/2021	Nine items were identified requiring repair/maintenance and completed within the required timeframe.
7/6/2021		3					3			3 on 7/6/2021	Three items were identified requiring repair/maintenance and completed within the required timeframe.
7/9/2021	0.5"-1.4" - 3.75 Hours *Intervals of high intensity/short duration rainfall occurred on 7/8/2021	1					1			1 on 7/9/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
VADEQ OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
7/1/2021	0.0"-0.2" - 1.5 Hours	1					1			1 on 7/2/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
7/7/2021		2					2		2 on 7/7/2021		Two items were identified requiring repair/maintenance and completed within the required timeframe.

LANDOWNER/THIRD PARTY REPORTED COMPLAINTS			
DATE OF OBSERVATION	NEAREST ROAD OR FEATURE	TOTAL NUMBER OBSERVATIONS	SUMMARY OF OBSERVATIONS
ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS			
DATE OF OBSERVATION	OBSERVATIONS	CONCLUSION AND RECOMMENDATIONS	
6/29/2021	The Environmental Auditor conducted a site evaluation at MVP-FR-292 (CIS/GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations related to proper ESC measures installation and installing enhanced ESC measures.	
7/2/2021	The Environmental Auditor conducted site evaluations at MVP-RO-281 (CIS/GAS) and MVP-RO-282 (CIS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental inspection staff regarding observations and recommendations related to monitoring and installing additional ESC measures as necessary.	
6/28/2021 through 7/11/2021	The Environmental Auditor reviewed and noted the daily MVP Punchlists, ODC reports and SWPPP Inspection Reports to be compliant during this reporting period for the Spread H Project.	The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and installing enhanced ESC measures as needed. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector, the Spread H Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity.	
REQUIRED FINDINGS AND CONCLUSIONS			
	Yes/No	If No, provide explanation and recommendation for corrective action (if any).	
Best management practices for the Project are in accordance with MVP's Annual Standards and Specifications and MVP's Site Specific ESC and SWM Plans?	Yes		
The temporary erosion and sediment control measures are properly installed, inspected, and maintained?	Yes		
All Ineffective Temporary Erosion and Sediment Control Measures are repaired and ESC Measures in Need of Routine Maintenance are maintained within the required timeframes ?	Yes		

Report Period Ending: 7/25/2021
 Report Prepared By: Joe Crea

SUMMARY OF FINDINGS

Total Number of SWPPP Inspections: **28** conducted from 7/12/2021 through 7/25/2021 (includes PY-006)
 Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/12/2021 through 7/25/2021 (includes Carry Over Items from 7/11/2021): **20**
 Total Number of ODCP Inspections at Laydown Yard PY-006: **6** (7/12/2021 through 7/17/2021); **6** (7/19/2021 through 7/24/2021)
 Total Number of VADEQ Observations from 7/12/2021 through 7/25/2021: **9**
 Total Number of Landowner/Third Party Reported Complaints: **1** (A third party complaint was submitted to the VADEQ on July 14, 2021 (IR #300189). The complainant cited "muddy runoff pumped from MVP trenching" from the "MVP trenching site in a field at the intersection of Dillons Mill and Adney Gap Road". Based on communication with the Spread H Environmental Inspection staff, the complainant entered the landowner's property on an all-terrain vehicle (ATV) adjacent to the MVP right of way. The Environmental Inspection staff compiled documentation which included photos depicting rutting caused by the complainant's vehicle and the complainant driving the ATV through the North Fork Blackwater River (S-D8). Dewatering activities were occurring on the right of way on July 14, 2021. Erosion and sediment control measures, which were enhanced were proper installed and functional. The VADEQ conducted an inspection on July 15, 2021 and per a Complaint Investigation Report (CIR) observed no off right of way impacts and the ESC measures installed/implemented and properly maintained per the approved ESC and SWM plans. The Environmental Auditor evaluated the dewatering structure on July 20, 2021. The structure was not operational at the time of the evaluation; however, it appeared to be properly installed and functional. The right of way was fully vegetated and the current construction activities were approximately 1,300 feet west of the stream location. Erosion and sediment control measures were observed to be installed and functional where construction activities were occurring at the time of the evaluation).
 Total Number of Right of Way Impacts Caused by Third Parties: **1** (livestock traffic)
 Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): **1**
 Total Number of Off Right of Way Impacts: **1** (The impacted area (access road) experienced high intensity/short duration rainfall events during the late evening on 7/10/2021. The storm events resulted in approximately 1.5 inches within approximate 8.5 hours. The ESC measures were repaired and enhanced per verification by the Environmental Auditor on 7/22/2021. The off right of way sediment impact has been extended indefinitely as landowner approval has not been granted. Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion).
 Total Number of Environmental Resource Impacts: **0**
 Total Number of ESC Measures in Need of Routine Maintenance Not Maintained Within Timeframes Required by MVP's Annual Standards and Specifications or as Otherwise Provided in the Consent Decree: **0**
Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 7/12/2021 through 7/25/2021.

CARRY OVER ITEMS FROM 7/11/2021

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
11/12/2020	2.4"-4.0" - 22 Hours *Remnants of Hurricane Eta continuing from 11/11/2020	1					1	1 on 11/12, 11/18, 11/25, 12/9/, 12/17, 12/23, 12/30/2020, 1/6/, 1/13, 1/20, 1/27, 2/3/, 2/10, 2/17, 2/24, 3/10, 3/17, 3/23, 3/31, 4/7, 4/13, 4/21, 4/28, 5/5, 5/12, 5/19, 6/2, 6/9 and 6/16, and 7/15/2021 to be completed on 8/17/2021			Engineering design being prepared for slide impact area. A long term extension approval has been granted.

ENVIRONMENTAL INSPECTOR OBSERVATIONS

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
7/12/2021	0.3"-1.8" - 8.5 Hours *High intensity/short duration storm events occurred late 7/10/2021	10		1			9		3 on 7/12/2021 (Off right of way impact was extended indefinitely due to restricted access) 3 on 7/13/2021	1 on 7/12/2021 2 on 7/13/2021 1 on 7/14/2021	Ten items were identified requiring repair/maintenance and completed within the required timeframe. One of the identified items was identified as an off right of way sediment impact approximately 20 feet off right of way within an upland area. High intensity/short duration rainfall events caused sediment controls along an access road to become overwhelmed. The ESC measures were repaired and enhanced. The off right of way impacted area has been extended indefinitely due to landowner approval not being granted due to restricted access. No resources were impacted. An Agency Compliance Form (Problem Area Report #641) was submitted on 7/12/2021 by the Spread H LEI. The Environmental Auditor evaluated the location on 7/12/2021 and provided recommendations to the EI and LEI to install enhanced ESC measures. The Environmental Auditor observed the enhancements installed on 7/22/2021.
7/13/2021		1					1			1 on 7/14/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
7/14/2021		2				1	1			1 on 7/14/2021 1 on 7/15/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to livestock traffic.
7/16/2021		2					2			2 on 7/16/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
7/17/2021		1					1			1 on 7/17/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
7/22/2021		2					2			2 on 7/23/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
7/23/2021		1					1			1 on 7/23/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.

VADEQ OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
7/14/2021		5			1		4			5 on 7/15/2021	Five items were identified requiring repair/maintenance and completed within the required timeframe. One of the identified items was caused by weather related damage to ESC measures due to a fallen tree.
7/16/2021		1					1			1 on 7/16/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
7/21/2021		2					2			2 on 7/21/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
7/22/2021		1					1			1 on 7/22/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
LANDOWNER/THIRD PARTY REPORTED COMPLAINTS											
DATE OF OBSERVATION	NEAREST ROAD OR FEATURE						TOTAL NUMBER OBSERVATIONS			SUMMARY OF OBSERVATIONS	
7/14/2021	Dillons Mill Road/MVP-FR-292.01						1			A third party complaint was submitted to the VADEQ on July 14, 2021 (IR #300189). The complainant cited "muddy runoff pumped from MVP trenching" from the "MVP trenching site in a field at the intersection of Dillons Mill and Adney Gap Road". Based on communication with the Spread H Environmental Inspection staff, the complainant entered the landowner's property on an all-terrain vehicle (ATV) adjacent to the MVP right of way. The Environmental Inspection staff compiled documentation which included photos depicting rutting caused by the complainant's vehicle and the complainant driving the ATV through the North Fork Blackwater River (S-D8). Dewatering activities were occurring on the right of way on July 14, 2021. Erosion and sediment control measures, which were enhanced were proper installed and functional. The VADEQ conducted an inspection on July 15, 2021 and per a Complaint Investigation Report (CIR) observed no off right of way impacts and the ESC measures installed/implemented and properly maintained per the approved ESC and SWM plans. The Environmental Auditor evaluated the dewatering structure on July 20, 2021. The structure was not operational at the time of the evaluation; however, it appeared to be properly installed and functional. The right of way was fully vegetated and the current construction activities were approximately 1,300 feet west of the stream location. Erosion and sediment control measures were observed to be installed and functional where construction activities were occurring at the time of the evaluation.	
ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS											
DATE OF OBSERVATION	OBSERVATIONS						CONCLUSION AND RECOMMENDATIONS				
7/12/2021	The Environmental Auditor conducted site evaluations at MVP-FR-292.01 (CIS) and MVP-RO-280 (GAS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations related to proper ESC measures installation and installing enhanced ESC measures.				
7/13/2021	The Environmental Auditor conducted site evaluation at the following locations: MVP-RO-281 (CIS/GAS), MVP-RO-281.02 (CIS/GAS) and MVP-FR-292 (CIS/GAS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations related to monitoring ESC measures.				
7/19/2021	The Environmental Auditor conducted a site evaluation at MVP-RO-286.						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff and contractor staff regarding upcoming redlines implementation.				
7/20/2021	The Environmental Auditor conducted a site evaluation at MVP-FR-292 (GAS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations related to ESC measures repair/maintenance.				
7/22/2021	The Environmental Auditor conducted site evaluations at MVP-RO-280 (GAS) and MVP-RO-282 (CIS/GAS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations related to proper ESC measures installation.				
7/12/2021 through 7/25/2021	The Environmental Auditor reviewed and noted the daily MVP Punchlists, ODC reports and SWPPP Inspection Reports to be compliant during this reporting period for the Spread H Project.						The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and installing enhanced ESC measures as needed. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector, the Spread H Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity.				
REQUIRED FINDINGS AND CONCLUSIONS											
	Yes/No	If No, provide explanation and recommendation for corrective action (if any).									
Best management practices for the Project are in accordance with MVP's Annual Standards and Specifications and MVP's Site Specific ESC and SWM Plans?	Yes										
The temporary erosion and sediment control measures are properly installed, inspected, and maintained?	Yes										
All Ineffective Temporary Erosion and Sediment Control Measures are repaired and ESC Measures in Need of Routine Maintenance are maintained within the required timeframes ?	Yes										

Report Period Ending: 8/8/2021
 Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 27 conducted from 7/26/2021 through 8/8/2021 (includes PY-006)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/26/2021 through 8/8/2021 (includes Carry Over Items from 7/25/2021): 8											
Total Number of ODCP Inspections at Laydown Yard PY-006: 6 (7/26/2021 through 7/31/2021); 6 (8/2/2021 through 8/7/2021)											
Total Number of VADEQ Observations from 7/26/2021 through 8/8/2021: 13											
Total Number of Landowner/Third Party Reported Complaints: 2 (A third party complaint was submitted to the VADEQ on July 27, 2021. The report narrative alleges areas of "seeding of disturbed areas in the MVP right-of-way has not met minimum cover requirements". Photo documentation within the report (photos taken July 14, 2021) notes "areas of the right of way that are not adequately covered with vegetation". The photo log which serves as the basis for the report was developed via aerial photos taken from a manned aircraft. The Spread H Environmental Inspection staff continues to conduct daily inspections in addition to the required SWPPP inspections. The ESC measures throughout the right of way are repaired/maintained and enhanced as needed based on daily punch lists. The Environmental Auditor conducted evaluations throughout portions of the locations noted in the Complainant report and observed areas where stabilization meets coverage requirements along with isolated locations where vegetation has not been fully established and restabilization will need to occur. The ESC measures throughout the evaluated areas appeared to be installed and functional with no off right of way or resource impacts noted. The Environmental Auditor and the Spread H/MVP Environmental staff continue to communicate and recommendations are provided by the Environmental Auditor based on observations noted during the evaluations. 2. A third party complaint was submitted to the VADEQ on August 6, 2021. The introduction of the complaint cites that the "report includes photos from Franklin County, VA starting near Wirtz south of Route 220". However, the photos and noted Mileposts were actually located in Montgomery County. The complainant alleges areas of "seeding of disturbed areas in the MVP right-of-way has not met minimum cover requirements". Photo documentation within the report (corresponding photos taken November 2020 and July 2021) notes "areas of the right of way that are not adequately covered with vegetation". The photo log which serves as the basis for the report was developed via aerial photos taken from a manned aircraft. The Spread H Environmental Inspection staff continues to conduct daily inspections in addition to the required SWPPP inspections. The ESC measures throughout the right of way are repaired/maintained and enhanced as needed based on daily punch lists and the required SWPPP inspections. The Environmental Auditor reviews SWPPP Inspection Reports and Daily Punchlists which address temporary and permanent vegetative stabilization conditions throughout the right of way. The ESC measures, which include soil stabilization blanket, straw mulch and temporary seeding, throughout the evaluated areas are installed and maintained as necessary and no off right of way or resource impacts have been noted during this timeframe. The Environmental Auditor and the Spread H/MVP Environmental staff continue to communicate and recommendations are provided by the Environmental Auditor based on observations noted during the evaluations).											
Total Number of Right of Way Impacts Caused by Third Parties: 0											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): 0											
Total Number of Off Right of Way Impacts: 0											
Total Number of Environmental Resource Impacts: 0											
Total Number of ESC Measures in Need of Routine Maintenance Not Maintained Within Timeframes Required by MVP's Annual Standards and Specifications or as Otherwise Provided in the Consent Decree: 0											
Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 7/26/2021 through 8/8/2021.											

CARRY OVER ITEMS FROM 7/25/2021

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
11/12/2020	2.4"-4.0" - 22 Hours *Remnants of Hurricane Eta continuing from 11/11/2020	1					1	1 on 11/12, 11/18, 11/25, 12/9/12/17, 12/23, 12/30/2020, 1/6/1/13, 1/20, 1/27, 2/3/2/10, 2/17, 2/24, 3/10, 3/17, 3/23, 3/31, 4/7, 4/13, 4/21, 4/28, 5/5, 5/12, 5/19, 6/2, 6/9 and 6/16, and 7/15/2021 to be completed on 8/17/2021			Engineering design being prepared for slide impact area. A long term extension approval has been granted.

ENVIRONMENTAL INSPECTOR OBSERVATIONS

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
7/27/2021		3					3			3 on 7/28/2021	Three items were identified requiring repair/maintenance and completed within the required timeframe.
7/28/2021		2					2			2 on 7/28/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
7/30/2021		1					1			1 on 7/30/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
8/5/2021		1					1			1 on 8/5/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.

VADEQ OBSERVATIONS

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
7/28/2021		6					6	1 on 7/29/2021 to be completed on 7/30/2021	2 on 7/28/2021 1 on 7/30/2021 (Ext. Request)	1 on 7/28/2021 2 on 7/29/2021	Six items were identified requiring repair/maintenance and completed within the required timeframe. One of the identified items was via an extension request approval.
7/29/2021		6					6		1 on 7/30/2021	5 on 7/30/2021	Six items were identified requiring repair/maintenance and completed within the required timeframe.
8/2/2021		1					1			1 on 8/3/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.

LANDOWNER/THIRD PARTY REPORTED COMPLAINTS			
DATE OF OBSERVATION	NEAREST ROAD OR FEATURE	TOTAL NUMBER OBSERVATIONS	SUMMARY OF OBSERVATIONS
7/27/2021	MVP-FR-292 (CIS), Websters Corner Road (CIS/GAS) and Cahas Mountain Road #2 (CIS)	4 photos related to right of way stabilization	A third party complaint was submitted to the VADEQ on July 27, 2021. The report narrative alleges areas of "seeding of disturbed areas in the MVP right-of-way has not met minimum cover requirements". Photo documentation within the report (photos taken July 14, 2021) notes "areas of the right of way that are not adequately covered with vegetation". The photo log which serves as the basis for the report was developed via aerial photos taken from a manned aircraft. The Spread H Environmental Inspection staff continues to conduct daily inspections in addition to the required SWPPP inspections. The ESC measures throughout the right of way are repaired/maintained and enhanced as needed based on daily punch lists. The Environmental Auditor conducted evaluations throughout portions of the locations noted in the Complainant report and observed areas where stabilization meets coverage requirements along with isolated locations where vegetation has not been fully established and restabilization will need to occur. The ESC measures throughout the evaluated areas appeared to be installed and functional with no off right of way or resource impacts noted. The Environmental Auditor and the Spread H/MVP Environmental staff continue to communicate and recommendations are provided by the Environmental Auditor based on observations noted during the evaluations.
Report dated 8/6/2021 Photo Log November 2021 and July 2021	Catawba Road (MP 227.45) to MVP-MN-278.01 (MP 237.2)	16 Observations (July Photo Log)	A third party complaint was submitted to the VADEQ on August 6, 2021. The introduction of the complaint cites that the "report includes photos from Franklin County, VA starting near Wirtz south of Route 220". However, the photos and noted Mileposts were actually located in Montgomery County. The complainant alleges areas of "seeding of disturbed areas in the MVP right-of-way has not met minimum cover requirements". Photo documentation within the report (corresponding photos taken November 2020 and July 2021) notes "areas of the right of way that are not adequately covered with vegetation". The photo log which serves as the basis for the report was developed via aerial photos taken from a manned aircraft. The Spread H Environmental Inspection staff continues to conduct daily inspections in addition to the required SWPPP inspections. The ESC measures throughout the right of way are repaired/maintained and enhanced as needed based on daily punch lists and the required SWPPP inspections. The Environmental Auditor reviews SWPPP Inspection Reports and Daily Punchlists which address temporary and permanent vegetative stabilization conditions throughout the right of way. The ESC measures, which include soil stabilization blanket, straw mulch and temporary seeding, throughout the evaluated areas are installed and maintained as necessary and no off right of way or resource impacts have been noted during this timeframe. The Environmental Auditor and the Spread H/MVP Environmental staff continue to communicate and recommendations are provided by the Environmental Auditor based on observations noted during the evaluations.
ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS			
DATE OF OBSERVATION	OBSERVATIONS	CONCLUSION AND RECOMMENDATIONS	
7/26/2021	The Environmental Auditor conducted site evaluations at MVP-FR-292 (CIS) and MVP-MLV-AR-29.01 (CIS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations related to repair/maintenance and proper ESC measures installation.	
7/27/2021	The Environmental Auditor conducted site evaluations at MVP-RO-279.01 and Webster Corner Road (CIS/GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations to monitor ESC measures related to temporary stabilization. The Environmental Auditor met with the LEI to evaluate the current access road conditions and surrounding topography to determine appropriate ESC measures prior to the commencement of construction activities.	
7/28/2021	The Environmental Auditor conducted a site evaluation at MVP-RO-286.	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff regarding observations and recommendations related to ESC measures installation.	
7/29/2021	The Environmental Auditor conducted a site evaluation at MVP-RO-286.	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff regarding observations and recommendations related to ESC measures installation.	
8/2/2021	The Environmental Auditor conducted site evaluations at MVP-RO-286 and MVP-RO-282 (GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff regarding observations and recommendations related to proper ESC measures installation and assisted with draft redlines related to a Clean Water Diversion (CWD) system.	
8/3/2021	The Environmental Auditor conducted a site evaluation at MVP-RO-282 (GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations related to proper ESC measures installation.	
8/5/2021	The Environmental Auditor conducted site evaluations at MVP-RO-286 (CIS/GAS) and MVP-FR-292 (CIS/GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental staff regarding observations and recommendations related to maintenance/repair and proper ESC measures installation.	
8/6/2021	The Environmental Auditor conducted a site evaluation at MVP-RO-279.01.	The Environmental Auditor met with the EI to evaluate the current access road conditions and develop a plan for appropriate ESC measures prior to the commencement of maintenance activities.	
7/26/2021 through 8/8/2021	The Environmental Auditor reviewed and noted the daily MVP Punchlists, ODC reports and SWPPP Inspection Reports to be compliant during this reporting period for the Spread H Project.	The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and installing enhanced ESC measures as needed. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector, the Spread H Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity.	
REQUIRED FINDINGS AND CONCLUSIONS			
	Yes/No	If No, provide explanation and recommendation for corrective action (if any).	
Best management practices for the Project are in accordance with MVP's Annual Standards and Specifications and MVP's Site Specific ESC and SWM Plans?	Yes		
The temporary erosion and sediment control measures are properly installed, inspected, and maintained?	Yes		
All Ineffective Temporary Erosion and Sediment Control Measures are repaired and ESC Measures in Need of Routine Maintenance are maintained within the required timeframes ?	Yes		

Report Period Ending: 8/22/2021
 Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 30 conducted from 8/9/2021 through 8/22/2021 (includes PY-006)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 8/9/2021 through 8/22/2021 (includes Carry Over Items from 8/8/2021): 97											
Total Number of ODCP Inspections at Laydown Yard PY-006: 5 (8/9/2021-8/10/2021 and 8/12/2021-8/14/2021); 6 (8/16/2021 through 8/21/2021) *ODCP inspection was not conducted on 8/11/2021											
Total Number of VADEQ Observations from 8/9/2021 through 8/22/2021: 26 (One item was redundant item on 8/20/2021 as it was initially observed within Environmental Inspector Observation)											
Total Number of Landowner/Third Party Reported Complaints: 1 (A third party complaint was submitted to the VADEQ on August 14, 2021. A Pollution Incident Summary Report (IR #300568) was generated by the VADEQ. The complainant alleged that the contractor was "actively running heavy digging equipment through a stream". Based on communication with the Spread H Environmental Inspection staff a site inspection was conducted on 8/14/2021 and no construction equipment operated within the stream. The VADEQ conducted an inspection on 8/16/2021 and did not observe any impacts to the stream. The Environmental Auditor conducted a follow up inspection on 8/19/2021 and did not observe any impacts to the stream. Refer to Landowner/Third Party Complaints below).											
Total Number of Right of Way Impacts Caused by Third Parties: 0											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): 0											
Total Number of Off Right of Way Impacts: 28 (1. Two off right of way impacted areas were observed on 8/12/2021 as a result high intensity/short duration rainfall events . These storm events resulted in approximately 1.7 inches in approximately 36 minutes. The ESC measures were repaired/maintained, off right of way sediment clean up and stabilization occurred within the required timeframe. 2. One off right of way sediment impact occurred on 8/13/2021 due to rock and soil overburden material migrating off right of way during a blasting detonation. The off right of way impact has been extended indefinitely as landowner approval has not been granted. 3. Twenty-five off right of way impacts due to high intensity/short duration rainfall events were observed by the EIs on 8/16/2021, 8/18/2021 and 8/20/2021. These storm events resulted in approximately 3.9 inches in 2.25 hours on late 8/15/2021, 1.6 inches in 2 hours on 8/17/2021, and 0.8 and 1.9 inches in 1.20 hours, respectively on late 8/19/2021. The ESC measures at 24 locations have been repaired/maintained and enhanced within the required timeframes. The remaining location has interim ESC measures installed with ongoing repair/maintenance via extension request approvals due to saturated conditions. The off right of way sediment at 13 locations was retrieved and the areas stabilized. The remaining 12 off right of way sediment impacts have been issued indefinite extension approvals and will be addressed upon landowner permission. A voluntary temporary suspension of construction activities related to forward progress was implemented by MVP on 8/16/2021 from approximate stations 13116+00 to 13213+00. During this timeframe construction crews focused on addressing ESC measures impacted by the storm events. Prior to resuming forward progress covered by the temporary suspension of work, the Spread H Construction Management staff is required to submit an authorization request to MVP for review and approval and a DEQ follow up inspection. Additional ESC enhancements and BMP measures related to open trench construction were developed by MVP. The Environmental Auditor will continue to evaluate the impacted areas the week of 8/23/2021 and provide additional recommendations as needed. Refer to Environmental Inspector Observations, VADEQ Observations, and Environmental Auditor Field Observations below for further discussion).											
Total Number of Environmental Resource Impacts: 3 (On 8/20/2021 S-IJ12/W-MN7, W-EF45 and W-EF17 were observed to be impacted due to high intensity/short duration rainfall events late 8/19/2021 which produced approximately 1.9 inches (S-IJ12/W-MN7 and W-EF45) and 0.8 inches (W-EF17) in 1.20 hours, respectively. The ESC measures were repaired/maintained and enhanced at all impacted environmental resource locations. Landowner access was granted and off right of way access road gravel clean up occurred at W-EF17. Sediment clean up occurred within the right of way portion of S-IJ12/W-MN7. The remaining off right way portion of S-IJ12/W-MN7 and W-EF45 received indefinite extension approvals until landowner permission is granted. Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations below for further discussion).											
Total Number of ESC Measures in Need of Routine Maintenance Not Maintained Within Timeframes Required by MVP's Annual Standards and Specifications or as Otherwise Provided in the Consent Decree: 0											
Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 8/9/2021 through 8/22/2021.											

CARRY OVER ITEMS FROM 8/8/2021											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
11/12/2020	2.4"-4.0" - 22 Hours *Remnants of Hurricane Eta continuing from 11/11/2020	1					1	1 on 11/12, 11/18, 11/25, 12/9/, 12/17, 12/23, 12/30/2020, 1/6/, 1/13, 1/20, 1/27, 2/3/, 2/10, 2/17, 2/24, 3/10, 3/17, 3/23, 3/31, 4/7, 4/13, 4/21, 4/28, 5/5, 5/12, 5/19, 6/2, 6/9 and 6/16, 7/15, and 8/16/2021 to be completed on 9/17/2021			Engineering design being prepared for slide impact area. A long term extension approval has been granted.

ENVIRONMENTAL INSPECTOR OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
8/12/2021	0.0"-0.2" - 1.5 Hours *Rainfall occurred on 8/11/2021	2		2			0		2 on 8/13/2021		Two of the items were identified as off right of way sediment impacts approximately 40-feet and 15-feet off right of way within upland areas. A high intensity/short duration rainfall event caused sediment controls to become overwhelmed. The 40-foot off right of way impact occurred within the pipeline right of way and the 15-foot off right of way impact occurred along an access road. The impacted ESC measures were repaired/maintained, off right of way sediment/gravel cleaned up, and the area stabilized. An Agency Compliance Form (Problem Area Report #647) was submitted by the EI on 8/13/2021. No resources were impacted. The Environmental Auditor evaluated both of the locations, communicated with the Spread H Environmental staff, and provided recommendations that included the installation of enhanced ESC measures.
8/13/2021	0.0"-1.7" - 4 Hours *Isolated high intensity/short duration storm events with a period of heavy rainfall occurring within 40 minutes began in the afternoon on 8/12/2021	2		1			1	1 on 8/14/2021 (Extended indefinitely until landowner approval is granted)		1 on 8/14/2021	Two items were identified requiring repair/maintenance and one was completed within the required timeframe. The off right of way impact occurred within an upland area and was caused by rock and soil overburden material migrating off right of way upon detonation of a blast for establishing the right of way. The material travelled approximately 10-20 feet off right of way. Landowner approval has not been granted to retrieve the rock and soil material and conduct stabilization activities and this item has been extended indefinitely until landowner approval is granted. The Spread H Environmental Inspection staff recommended the use of blasting mats for future blasting activities.
8/16/2021	0.6"-4.2" - 9 Hours Heavy storm events with high intensity/short duration rainfall occurred late 8/15/2021	28		11			16	8 on 8/17/2021 (7 off right of way impacts and one off right of way stabilization extended indefinitely until landowner permission is granted) 4 on 8/17/2021 to be completed on 8/18/2021 (3 off right of way impacts) 2 on 8/17/2021 through 8/22/2021 to be completed on 8/23/2021 (1 off right of way impact) 1 on 8/19/2021 and 8/22/2021 to be completed on 8/25/2021	1 on 8/16/2021 9 on 8/17/2021 (6 off right of way impacts 3 Ext. Request/3 Landowner permission granted) 4 on 8/18/2021 (3 off right of way impacts and one off right of way stabilization landowner permission granted) 1 on 8/18/2021 (Ext. Request)	1 on 8/16/2021 8 on 8/17/2021	Twenty-eight items were identified requiring repair/maintenance and 24 were completed within the required timeframe. Eleven of the identified items were identified as off right of way sediment impacts approximately 50, 700, 15, 10, 3, 5, 2, 225, 6, 1, and 5-feet off right of way within upland areas. Heavy storm events with intervals of high intensity/short duration rainfall caused sediment controls to become overwhelmed. The impacted ESC measures were repaired/maintained and enhanced as allowable due to saturated conditions and additional interim ESC measures were installed where the 700-foot off right of way impact occurred as repair/maintenance has been ongoing. Off right of way sediment clean up occurred and the impacted off right of way areas were stabilized within 9 of the identified locations. Two off right of way impacts received extension request approvals. One received multiple extension requests due to saturated conditions and the other an indefinite extension until landowner permission is granted. Agency Compliance Forms (Problem Area Reports #654, #656, #657, #659, #660, and #662) were submitted by the EIs on 8/16/2021. No resources were impacted. The Environmental Auditor evaluated several of the locations, communicated with the Spread H Environmental staff, and provided recommendations that included the installation of enhanced ESC measures. Two items have been extended via extension request approvals (one 24-Hour item and one Three Day item).
8/18/2021	0.5"-1.6" - 4 Hours *Isolated high intensity/short duration storm events occurred late on 8/17/2021 (Remnants of Tropical Storm Fred)	16		2			14	1 on 8/19/2021 (Extended indefinitely until landowner permission is granted) 1 on 8/19/2021 to be completed on 8/20/2021	1 on 8/18/2021 4 on 8/19/2021 1 on 8/20/2021 (Ext. Request)	3 on 8/18/2021 6 on 8/19/2021	Sixteen items were identified requiring repair/maintenance and 15 were completed within the required timeframe. Two of the identified items were identified as off right of way sediment impacts approximately 25 and 50-feet off right of way within upland areas. A high intensity/short duration rainfall event caused sediment controls to become overwhelmed. The impacted ESC measures were repaired/maintained and enhanced at both locations. Off right of way sediment clean up occurred and the impacted area was stabilized at one of the identified locations. The other location received an indefinite extension until landowner permission is granted. Agency Compliance Forms (Problem Area Reports #666 and #668) were submitted by the Spread H LEI on 8/18/2021. No resources were impacted. The Environmental Auditor evaluated the right of way, communicated with the Spread H Environmental staff, and provided recommendations that included the installation of enhanced ESC measures. An extension request was approved for one other location and completed within the required timeframe.
8/20/2021	0.1"-1.9" - 2 Hours *Isolated high intensity/short duration storm events occurred late on 8/19/2021	48	3 (S-U12/W-MN7, W-EF45, and W-EF17)	12			34	11 on 8/21/2021 (9 off right of way and 2 resource impacts extended indefinitely until landowner permission is granted)	4 on 8/20/2021 6 on 8/21/2021 (3 off right of way and 1 resource impact)	10 on 8/20/2021 15 on 8/21/2021	Forty-eight items were identified requiring repair/maintenance and 36 were completed within the required timeframe. Twelve of the identified items were identified as off right of way sediment impacts approximately 4, 80, 4, 10, 4, 10, 8, 3, 20, 10, 100 and 15-feet off right of way within upland areas. The off right of way impact which traveled approximately 80 feet resulted in an environmental resource impact at S-U12/W-MN7. The sediment overwhelmed the ESC measures and subsequently impacted the stream. The off right of way impact which traveled approximately 100 feet resulted in an environmental resource impact at W-EF45. The sediment overwhelmed the ESC measures and subsequently deposited within the wetland. The third resource impact was at W-EF17 where heavy runoff traveled down an adjacent landowner access road and combined with runoff from a project access road. Scouring occurred at an existing culvert resulting in gravel depositing 5 feet off the access road within the wetland. High intensity/short duration rainfall events caused sediment controls to become overwhelmed. The impacted ESC measures were repaired/maintained and enhanced at all locations. Off right of way sediment clean up occurred and the impacted areas stabilized at four of the identified locations (3 off right of way and W-EF17). Agency Compliance Forms (Problem Area Reports #669, #670, #671, #673, #674, #675, #676, and #677) were submitted by the Spread H LEI on 8/20/2021. The Environmental Auditor evaluated portions of the right of way, communicated with the Spread H Environmental staff, and provided recommendations that included the installation of enhanced ESC measures. Nine off right of way and two resource impacts received indefinite extensions until landowner permission is granted. Two remaining maintenance/repair items have three days to be completed.

VADEQ OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
8/9/2021		2					2			2 on 8/10/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
8/11/2021		3					3			3 on 8/12/2021	Three items were identified requiring repair/maintenance and completed within the required timeframe.
8/12/2021	0.0"-0.2" - 1.5 Hours *Rainfall occurred on 8/11/2021	2					2			2 on 8/13/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
8/13/2021	0.0"-1.7" - 4 Hours *Isolated high intensity/short duration storm events with a period of heavy rainfall occurring within 40 minutes began in the afternoon on 8/12/2021	4					4		2 on 8/14/2021	2 on 8/14/2021	Four items were identified requiring repair/maintenance and completed within the required timeframe.
8/17/2021	8/15/2021 0.0"-1.7" - 4 Hours *Isolated high intensity/short duration storm events with a period of heavy rainfall occurring within 40 minutes 8/16/2021 0.0"-0.1" - 3.25 Hours *Rainfall occurred on 8/16/2021	11					11			4 on 8/18/2021 5 on 8/19/2021 2 on 8/20/2021	Eleven items were identified requiring repair/maintenance and completed within the required timeframe.
8/18/2021	0.5"-1.6" - 4 Hours *Isolated high intensity/short duration storm events occurred late on 8/17/2021 (Remnants of Tropical Storm Fred)	1					1		1 on 8/19/2021		One item was identified requiring repair/maintenance and completed within the required timeframe.
8/20/2021	0.1"-1.9" - 2 Hours *Isolated high intensity/short duration storm events occurred late on 8/19/2021	3			*1 (Redundant item per Environmental Inspector Observation reported above on 8/20/2021)		2	1 on 8/21/2021 (Extended indefinitely until landowner permission is granted) *Redundant item per Environmental Inspector Observation reported above on 8/20/2021		1 on 8/20/2021 1 on 8/21/2021	Three items were identified requiring repair/maintenance and two were completed within the required timeframe. The off right of way sediment impact was also observed by the Spread H EI and noted in the Environmental Inspector Observations on 8/20/2021. An indefinite extension was approved until landowner permission has been granted. No resources were impacted.
LANDOWNER/THIRD PARTY REPORTED COMPLAINTS											
DATE OF OBSERVATION	NEAREST ROAD OR FEATURE						TOTAL NUMBER OBSERVATIONS			SUMMARY OF OBSERVATIONS	
8/14/2021	MVP-RO-286 (GAS)						1			A third party complaint was submitted to the VADEQ on August 14, 2021. A Pollution Incident Summary Report (IR #300568) was generated by the VADEQ. The complainant alleged that the contractor was "actively running heavy digging equipment through a stream". Based on communication with the Spread H Environmental Inspection staff a site inspection was conducted on 8/14/2021 and no construction equipment operated within the stream. The VADEQ conducted an inspection on 8/16/2021 and did not observe any impacts to the stream. The Environmental Auditor conducted a follow up inspection on 8/19/2021 and did not observe any impacts to the stream.	
ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS											
DATE OF OBSERVATION	OBSERVATIONS						CONCLUSION AND RECOMMENDATIONS				
8/9/2021	The Environmental Auditor conducted a site evaluation at MVP-RO-280 (GAS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI regarding recommendations related to grading and ESC measures in areas where open pipeline trenches exist.				
8/10/2021	The Environmental Auditor conducted site evaluations at MVP-RO-282 (GAS) and MVP-RO-286 (CIS/GAS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI regarding proper soil stabilization blanket (SSB) installation.				
8/16/2021	The Environmental Auditor conducted site evaluations at MVP-FR-292.01/MVP-MLV-AR-29.01 (CIS) and MVP-FR-292 (CIS).						The Environmental Auditor evaluated locations where off right of way sediment impacts occurred as a result of high intensity/short duration storm events. The Environmental Auditor observed locations where ESC measures were being repaired/maintained and off right of way clean up/stabilization efforts were underway. The Environmental Auditor observed locations where ESC measures require proper installation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff, Chief EI and MVP Environmental staff regarding observations and recommendations related to proper ESC measures installation and installing enhanced ESC measures.				
8/19/2021	The Environmental Auditor conducted site evaluations at MVP-FR-291 (GAS) and MVP-RO-286 (CIS/GAS).						The Environmental Auditor evaluated a steep slope location where runoff caused by a high intensity/short duration storm event resulted in off right of way sediment impacts. The Environmental Auditor observed ESC measures on the slope being repaired and replaced at the time of the evaluation. The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff regarding observations and recommendations to conduct additional repairs/maintenance and install enhanced ESC measures.				
8/20/2021	The Environmental Auditor conducted site evaluations at MVP-RO-282 (Access Road) and MVP-RO-286 (CIS).						The Environmental Auditor evaluated locations where off right of way sediment impacts occurred as a result of high intensity/short duration storm events. The Environmental Auditor observed locations where ESC measures were being repaired/maintained and off right of way clean up/stabilization efforts were underway. The Environmental Auditor observed locations where ESC measures require proper installation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff, Chief EI and MVP Environmental staff regarding observations and recommendations related to proper ESC measures installation and installing enhanced ESC measures.				
8/9/2021 through 8/22/2021	The Environmental Auditor reviewed and noted the daily MVP Punchlists and SWPPP Inspection Reports to be compliant during this reporting period for the Spread H Project. The Environmental Auditor noted that an ODCP inspection was not conducted on 8/11/2021 and confirmed that this inspection was missed.						The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and installing enhanced ESC measures as needed. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector, the Spread H Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity. The Environmental Auditor recommends that ODCP inspections are conducted each day active construction is occurring.				
REQUIRED FINDINGS AND CONCLUSIONS											
	Yes/No	If No, provide explanation and recommendation for corrective action (if any).									
Best management practices for the Project are in accordance with MVP's Annual Standards and Specifications and MVP's Site Specific ESC and SWM Plans?	Yes										
The temporary erosion and sediment control measures are properly installed, inspected, and maintained?	No	MVP-RO-286 (CIS) approximate station 12893+00: The Environmental Auditor conducted a site evaluation on 8/20/2021 following a storm event with high intensity/short duration rainfall which resulted in off right of way and a resource impact. The Environmental Auditor observed that a waterbar end sump was overwhelmed at approximate station 12895+00 and subsequently caused an off right of way/resource impact. Upon further assessment the Environmental Auditor observed that a waterbar was not installed at approximate station 12893+00 (upslope of approximate station 12895+00) per the ESC plans. The Environmental Auditor recommends installing ESC measures per the required ESC plans.									
All Ineffective Temporary Erosion and Sediment Control Measures are repaired and ESC Measures in Need of Routine Maintenance are maintained within the required timeframes ?	Yes										

Report Period Ending: 9/5/2021

Report Prepared By: Joe Crea

SUMMARY OF FINDINGS

Total Number of SWPPP Inspections: 27 conducted from 8/23/2021 through 9/5/2021 (includes PY-006)

Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 8/23/2021 through 9/5/2021 (includes Carry Over Items from 8/22/2021): 45

Total Number of ODCP Inspections at Laydown Yard PY-006: 6 (8/23/2021-8/28/2021); 6 (8/30/2021 through 9/4/2021)

Total Number of VADEQ Observations from 8/23/2021 through 9/5/2021: 11

Total Number of Landowner/Third Party Reported Complaints: 2 (1. A third party complaint was submitted to the FERC and filed on August 23, 2021. The complainant cited an "excavator in stream" and the "MVP's rushed and aggressive construction has and will continue to cause immediate and long-term effects, in addition to cumulative impacts to groundwater, streams, wetlands". The complainant specifically cites S-EF44/W-EF44 and W-EF45 as resources impacted by the project. Based on communication with the Spread H Environmental Inspection staff a site inspection was conducted on 8/14/2021 by the Spread H EI and on 8/16/2021 by the VADEQ. Both inspections observed no construction equipment operated within S-EF44/W-EF44. The Environmental Auditor conducted a follow up inspection on 8/19/2021 and did not observe any impacts to the stream. On 8/20/2021 a high intensity/short duration storm event produced approximately 1.9 inches in 1.2 hours resulting in an off right of way sediment impact to W-EF45. The ESC measures were repaired/maintained and enhanced on 8/21/2021 and the Environmental Auditor evaluated this location on 8/25/2021 and provided additional recommendations. The off right of way sediment (approximately 1 cubic yard) has not been retrieved due to restricted access and awaiting landowner permission. The Spread H Environmental Inspection staff continues to conduct daily inspections and required SWPPP inspections. The Environmental Auditor continues to conduct site evaluations and notes communication between the Environmental Inspection staff and the contractor. 2. A third party complaint from a Soil and Water Conservation District Director was submitted to the VADEQ on 9/2/2021 (Pollution Incident Detail #300801). The complainant alleges "multiple failures of erosion and sediment controls". Per the Closure section of #30081 dated 9/7/2021, the VADEQ conducted a site inspection and observed no off right of way sediment impacts (which included S-EF20A). The ESC measures were observed to be installed and functional except of one location where sediment control measures required maintenance. The VADEQ noted that the repairs were conducted immediately on the day of their inspection).

Total Number of Right of Way Impacts Caused by Third Parties: 0

Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): 0

Total Number of Off Right of Way Impacts: 0

Total Number of Environmental Resource Impacts: 0

Total Number of ESC Measures in Need of Routine Maintenance Not Maintained Within Timeframes Required by MVP's Annual Standards and Specifications or as Otherwise Provided in the Consent Decree: 0

Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 8/23/2021 through 9/5/2021.

CARRY OVER ITEMS FROM 8/22/2021

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
11/12/2020	2.4"-4.0" - 22 Hours *Remnants of Hurricane Eta continuing from 11/11/2020	1					1	1 on 11/12, 11/18, 11/25, 12/9/, 12/17, 12/23, 12/30/2020, 1/6/, 1/13, 1/20, 1/27, 2/3/, 2/10, 2/17, 2/24, 3/10, 3/17, 3/23, 3/31, 4/7, 4/13, 4/21, 4/28, 5/5, 5/12, 5/19, 6/2, 6/9 and 6/16, 7/15, and 8/16/2021 to be completed on 9/17/2021			Engineering design being prepared for slide impact area. A long term extension approval has been granted.
8/13/2021	0.0"-1.7" - 4 Hours *Isolated high intensity/short duration storm events with a period of heavy rainfall occurring within 40 minutes	1		1				1 on 8/14/2021 (Extended indefinitely until landowner permission is granted)			One item is awaiting landowner permission for off right of way access.
8/16/2021	0.6"-4.2" - 9 Hours Heavy storm events with high intensity/short duration rainfall occurred late 8/15/2021	4		2			2	1 on 8/17/2021 to 8/31/2021 (Off right of way impact to be completed on 9/1/2021 due to saturated conditions) 1 on 8/17/2021 (Off right of way impact extended indefinitely until landowner permission is granted) 1 on 8/17/2021 to 8/27/2021 to be completed on 8/28/2021 1 on 8/19/2021 and 8/22/2021 to be completed on 8/25/2021	1 on 8/28/2021 (Ext. Request) 1 on 9/1/2021 (*Off right of way Ext Request/Received Landowner Permission)	1 on 8/23/2021 (Ext. Request)	Four items were identified requiring repair/maintenance and three were completed within the required timeframe via extension request approvals. One of the identified items received extension request approvals. The off right of way sediment was cleaned up and the impacted area stabilized. No resources were impacted. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event. The remaining item is awaiting landowner permission for off right of way access.
8/18/2021	0.5"-1.6" - 4 Hours *Isolated high intensity/short duration storm events (remnants of Tropical Storm Fred) occurred late on 8/17/2021	1		1				1 on 8/19/2021 (Off right of way impact extended indefinitely until landowner permission is granted)			One item is awaiting landowner permission for off right of way access. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event.
8/20/2021	0.1"-1.9" - 2 Hours *Isolated high intensity/short duration storm events occurred late on 8/19/2021	13	2	9			2	11 on 8/21/2021 (9 off right of way and 2 resource impacts extended indefinitely until landowner permission is granted)		2 on 8/23/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe. Eleven items are awaiting landowner permission for off right of way access. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event.

ENVIRONMENTAL INSPECTOR OBSERVATIONS

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
8/23/2021		1					1			1 on 8/24/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
8/25/2021	0.0"-0.6" - 25 minutes *Isolated high intensity/short duration rainfall event	4					4	1 on 8/28/2021 to be completed on 8/31/2021 due to safety concerns		3 on 8/28/2021 1 on 8/31/2021 (Ext. Request)	Four items were identified requiring repair/maintenance and completed within the required timeframe. One of the completed items received an extension request approval.
8/30/2021	0.1"-1.8" - 3 Hours *Isolated high intensity/short duration storm events occurred late 8/29/2021	10					10		3 on 8/30/2021 1 on 8/31/2021	4 on 8/30/2021 2 on 8/31/2021	Ten items were identified requiring repair/maintenance and completed within the required timeframe.
9/1/2021	0.5"-2.3" - 11.66 Hours *Rainfall (heavy at times) began late 8/31/2021 (Remnants of Hurricane Ida)	9					9		1 on 9/2/2021	3 on 9/1/2021 4 on 9/2/2021 1 on 9/3/2021	Nine items were identified requiring repair/maintenance and completed within the required timeframe.
9/3/2021		1					1			1 on 9/3/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.

VADEQ OBSERVATIONS

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
8/23/2021		1					1			1 on 8/23/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
8/31/2021		6					6			6 on 8/31/2021	Six items were identified requiring repair/maintenance and completed within the required timeframe.
9/1/2021	0.5"-2.3" - 11.66 Hours *Rainfall (heavy at times) began late 8/31/2021 (Remnants of Hurricane Ida)	1					1			1 on 9/1/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
9/3/2021		2					2			2 on 9/3/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
9/4/2021		1					1			1 on 9/4/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.

LANDOWNER/THIRD PARTY REPORTED COMPLAINTS

DATE OF OBSERVATION	NEAREST ROAD OR FEATURE	TOTAL NUMBER OBSERVATIONS	SUMMARY OF OBSERVATIONS
8/20/2021 (Filed by FERC on 8/23/2021)	MVP-RO-286	3	A third party complaint was submitted to the FERC and filed on August 23, 2021. The complainant cited an "excavator in stream" and the "MVP's rushed and aggressive construction has and will continue to cause immediate and long-term effects, in addition to cumulative impacts to groundwater, streams, wetlands". The complainant specifically cites S-EF44/W-EF44 and W-EF45 as resources impacted by the project. Based on communication with the Spread H Environmental Inspection staff a site inspection was conducted on 8/14/2021 by the Spread H EI and on 8/16/2021 by the VADEQ. Both inspections observed no construction equipment operated within S-EF44/W-EF44. The Environmental Auditor conducted a follow up inspection on 8/19/2021 and did not observe any impacts to the stream. On 8/20/2021 a high intensity/short duration storm event produced approximately 1.9 inches in 1.2 hours resulting in an off right of way sediment impact to W-EF45. The ESC measures were repaired/maintained and enhanced on 8/21/2021 and the Environmental Auditor evaluated this location on 8/25/2021 and provided additional recommendations. The off right of way sediment (approximately 1 cubic yard) has not been retrieved due to restricted access and awaiting landowner permission. The MVP Environmental Inspection staff continues to conduct daily inspections and required SWPPP inspections. The Environmental Auditor continues to conduct site evaluations and notes communication between the Environmental Inspection staff and the contractor.
9/1/2021 (Received by the VADEQ on 9/2/2021)	Yellow Finch Lane	1	A third party complaint from a Soil and Water Conservation District Director was submitted to the VADEQ on 9/2/2021 (Pollution Incident Detail #300801). The complainant alleges "multiple failures of erosion and sediment controls". Per the Closure section of #30081 dated 9/7/2021, the VADEQ conducted a site inspection and observed no off right of way sediment impacts (which included S-EF20A). The ESC measures were observed to be installed and functional except of one location where sediment control measures required maintenance. The VADEQ noted that the repairs were conducted immediately on the day of their inspection.

ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS

DATE OF OBSERVATION	OBSERVATIONS	CONCLUSION AND RECOMMENDATIONS
8/25/2021	The Environmental Auditor conducted site evaluations at MVP-RO-286 (CIS/GAS) and MVP-RO-282 (CIS/GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI regarding recommendations related to repair/maintenance and installing enhanced ESC measures.
8/27/2021	The Environmental Auditor conducted site evaluations at MVP-FR-292.01/MVP-MLV-AR-29.01 (CIS) and MVP-FR-291 (GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff, Chief EI and MVP Environmental staff regarding observations and recommendations related to proper ESC measures installation and installing enhanced ESC measures.
8/30/2021	The Environmental Auditor conducted site evaluations at MVP-FR-292 (CIS) and MVP-FR-291 (GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff, Chief EI and MVP Environmental staff regarding observations and recommendations related to proper ESC measures installation and installing enhanced ESC measures.
8/31/2021	The Environmental Auditor conducted site evaluations at MVP-RO-286 (CIS/GAS) and MVP-FR-291 (GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff, Chief EI and MVP Environmental staff regarding observations and recommendations related to proper ESC measures installation and installing enhanced ESC measures.
9/2/2021	The Environmental Auditor conducted a site evaluation at MVP-MN-276.03 (CIS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H Environmental Inspection staff, Chief EI and MVP Environmental staff regarding observations and recommendations related to repair/maintenance, proper ESC measures installation, and installing enhanced ESC measures.
8/23/2021 through 9/5/2021	The Environmental Auditor reviewed and noted the daily MVP Punchlists, ODCP Inspection Reports, and SWPPP Inspection Reports to be compliant during this reporting period for the Spread H Project.	The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and installing enhanced ESC measures as needed. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector, the Spread H Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity.

REQUIRED FINDINGS AND CONCLUSIONS

	Yes/No	If No, provide explanation and recommendation for corrective action (if any).
Best management practices for the Project are in accordance with MVP's Annual Standards and Specifications and MVP's Site Specific ESC and SWM Plans?	Yes	
The temporary erosion and sediment control measures are properly installed, inspected, and maintained?	Yes	
All Ineffective Temporary Erosion and Sediment Control Measures are repaired and ESC Measures in Need of Routine Maintenance are maintained within the required timeframes ?	Yes	

Report Period Ending: 9/19/2021
 Report Prepared By: Joe Crea

SUMMARY OF FINDINGS

Total Number of SWPPP Inspections: 26 conducted from 9/7/2021 through 9/19/2021 (includes PY-006) Labor Day Holiday on 9/6/2021
 Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 9/6/2021 through 9/19/2021 (includes Carry Over Items from 9/5/2021): 50
 Total Number of ODCP Inspections at Laydown Yard PY-006: 5 (9/7/2021-9/11/2021); 6 (9/13/2021 through 9/18/2021): Labor Day Holiday on 9/6/2021
 Total Number of VADEQ Observations from 9/6/2021 through 9/19/2021: 11
 Total Number of Landowner/Third Party Reported Complaints: 1 (A third party complaint was drafted and submitted on 9/8/2021 to Roanoke County regarding ponding on Honeysuckle Road. On 9/9/2021 the Roanoke County staff inspected the area and alleged that a "berm had been created" as "part of the MVP Project" and "not letting the water effectively dissipate." The Environmental Auditor observed no berm was constructed related to the MVP project and the ponded water was not present due to ongoing road maintenance by the MVP contractor).
 Total Number of Right of Way Impacts Caused by Third Parties: 0
 Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): 0
 Total Number of Off Right of Way Impacts: 0
 Total Number of Environmental Resource Impacts: 0
 Total Number of ESC Measures in Need of Routine Maintenance Not Maintained Within Timeframes Required by MVP's Annual Standards and Specifications or as Otherwise Provided in the Consent Decree: 0
 Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 9/6/2021 through 9/19/2021.

CARRY OVER ITEMS FROM 9/5/2021

DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
11/12/2020	2.4"-4.0" - 22 Hours *Remnants of Hurricane Eta continuing from 11/11/2020	1					1	1 on 11/12, 11/18, 11/25, 12/9/, 12/17, 12/23, 12/30/2020, 1/6/, 1/13, 1/20, 1/27, 2/3/, 2/10, 2/17, 2/24, 3/10, 3/17, 3/23, 3/31, 4/7, 4/13, 4/21, 4/28, 5/5, 5/12, 5/19, 6/2, 6/9 and 6/16, 7/15, 8/16, and 9/16/2021 to be completed on 10/17/2021			Engineering design being prepared for slide impact area and awaiting landowner permission. A long term extension approval has been granted.
8/13/2021	0.0"-1.7" - 4 Hours *Isolated high intensity/short duration storm events with a period of heavy rainfall occurring within 40 minutes	1		1				1 on 8/14/2021 (Extended indefinitely until landowner permission is granted)	1 on 9/16/2021		The rock and soil overburden material off right of way impact due to a blasting activity received an indefinite extension approval by the VADEQ. Per communication with the Spread H LEI, landowner permission has not been granted.
8/16/2021	0.6"-4.2" - 9 Hours Heavy storm events with high intensity/short duration rainfall occurred late 8/15/2021	1		1				1 on 8/17/2021 (Off right of way impact extended indefinitely until landowner permission is granted)			One item is awaiting landowner permission for off right of way access. The ESC measures were repaired/maintained and enhanced. No resources were impacted. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event.
8/18/2021	0.5"-1.6" - 4 Hours *Isolated high intensity/short duration storm events (remnants of Tropical Storm Fred) occurred late on 8/17/2021	1		1				1 on 8/19/2021 (Off right of way impact extended indefinitely until landowner permission is granted)			One item is awaiting landowner permission for off right of way access. The ESC measures were repaired/maintained and enhanced. No resources were impacted. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude
8/20/2021	0.1"-1.9" - 2 Hours *Isolated high intensity/short duration storm events occurred late on 8/19/2021	11	2	9				11 on 8/21/2021 (9 off right of way and 2 resource impacts extended indefinitely until landowner permission is granted)			Eleven items are awaiting landowner permission for off right of way access. The ESC measures were repaired/maintained and enhanced. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event.

ENVIRONMENTAL INSPECTOR OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
9/7/2021		6					6			4 on 9/7/2021 2 on 9/8/2021	Six items were identified requiring repair/maintenance and completed within the required timeframe.
9/8/2021		8					8			6 on 9/8/2021 2 on 9/9/2021	Eight items were identified requiring repair/maintenance and completed within the required timeframe.
9/9/2021	0.0"-0.2" - 2 Hours	1					1			1 on 9/9/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
9/10/2021		1					1			1 on 9/10/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
9/13/2021		9 (1 item by the Environmental Auditor)					9			2 on 9/13/2021 7 on 9/14/2021	Nine items were identified requiring repair/maintenance and completed within the required timeframe.
9/15/2021		2					2		2 on 9/15/2021		Two items were identified requiring repair/maintenance and completed within the required timeframe.
9/16/2021		6 (Environmental Auditor)					6			2 on 9/16/2021 4 on 9/17/2021	Six items were identified requiring repair/maintenance and completed within the required timeframe.
9/18/2021		2					2		2 on 9/18/2021		Two items were identified requiring repair/maintenance and completed within the required timeframe.
VADEQ OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
9/9/2021	0.0"-0.2" - 2 Hours	3					3		3 on 9/9/2021		Three items were identified requiring repair/maintenance and completed within the required timeframe.
9/11/2021		6					6			6 on 9/11/2021	Six items were identified requiring repair/maintenance and completed within the required timeframe.
9/15/2021		2					2			2 on 9/16/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
LANDOWNER/THIRD PARTY REPORTED COMPLAINTS											
DATE OF OBSERVATION	NEAREST ROAD OR FEATURE						TOTAL NUMBER OBSERVATIONS			SUMMARY OF OBSERVATIONS	
9/8/2021	Honeysuckle Road						1			A third party complaint was drafted and submitted on 9/8/2021 to Roanoke County regarding ponding on Honeysuckle Road. On 9/9/2021 the Roanoke County staff inspected the area and alleged that a "berm had been created" as "part of the MVP Project" and "not letting the water effectively dissipate." The Environmental Auditor observed no berm was constructed related to the MVP project and the ponded water not present due to continued road maintenance by the MVP contractor.	
ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS											
DATE OF OBSERVATION	OBSERVATIONS						CONCLUSION AND RECOMMENDATIONS				
9/7/2021	The Environmental Auditor conducted a site evaluation at Bottom Creek Road (GAS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI and EI regarding recommendations related to installing enhanced ESC measures.				
9/13/2021	The Environmental Auditor conducted site evaluations at Bottom Creek Road (GAS), MVP-RO-279.01 (CIS), and MVP-RO-281 (CIS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI and EI regarding recommendations related to installing enhanced ESC measures.				
9/15/2021	The Environmental Auditor conducted a site evaluation at MVP-MN-276.03 (CIS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI and EI regarding recommendations related to ESC measures repair/maintenance, installing enhanced ESC measures, and observations related to third party earth disturbance activities near the right of way.				
9/16/2021	The Environmental Auditor conducted site evaluations at Honeysuckle Road, MVP-RO-279.01 (CIS), and MVP-RO-286 (GAS).						The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI, EI and MVP Environmental staff regarding recommendations related to proper ESC measures installation. The Environmental Auditor reviewed a complaint regarding alleged berm construction related to MVP construction activities at Honeysuckle Road and observed no construction activities were conducted by the MVP contractor other than routine roadway maintenance.				
9/6/2021 through 9/19/2021	The Environmental Auditor reviewed and noted the daily MVP Punchlists, ODCP Inspection Reports, and SWPPP Inspection Reports to be compliant during this reporting period for the Spread H Project.						The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and installing enhanced ESC measures as needed. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector, the Spread H Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity.				
REQUIRED FINDINGS AND CONCLUSIONS											
		Yes/No	If No, provide explanation and recommendation for corrective action (if any).								
Best management practices for the Project are in accordance with MVP's Annual Standards and Specifications and MVP's Site Specific ESC and SWM Plans?		Yes									
The temporary erosion and sediment control measures are properly installed, inspected, and maintained?		Yes									
All Ineffective Temporary Erosion and Sediment Control Measures are repaired and ESC Measures in Need of Routine Maintenance are maintained within the required timeframes ?		Yes									

Report Period Ending: 9/30/2021
 Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 25 conducted from 9/20/2021 through 9/30/2021 (includes PY-006)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 9/20/2021 through 9/30/2021 (includes Carry Over Items from 9/19/2021): 61											
Total Number of ODCP Inspections at Laydown Yard PY-006: 6 (9/20/2021-9/25/2021); 5 (9/26/2021 through 9/30/2021)											
Total Number of VADEQ Observations from 9/20/2021 through 9/30/2021: 4											
Total Number of Landowner/Third Party Reported Complaints: 2 (1. A third party complaint was submitted to the VADEQ on behalf of a landowner. The undated report which was received by MVP on 9/21/2021 alleges "continuing problems" related to "Stormwater runoff from the right of way". The complainant's narratives affiliated with the photo log provide incorrect information regarding the right of way topography, drainage and functionality of the installed ESC measures. The off right of way property to the north (not fully shown within the complainant's report) is currently in grassed conditions and void of forested conditions which appear to be a result of previous logging activities. This location drains directly to the west into the landowner's existing disturbed road which runs parallel to the right of way. This existing landowner access road (not part of the MVP project) appears to have been graded in a cut condition and remains in a disturbed condition per previous site evaluations. The project right of way is currently stabilized with soil stabilization blanket (SSB)/vegetation, temporary waterbars, and permanent waterbars/end treatments. The Environmental Auditor observed no off right of way stormwater-related impacts from the right of way at the time of the evaluation. 2. A landowner complaint was submitted to the VADEQ on 9/23/2021 (IR #301005). The complainant alleged that erosion and sediment was leaving the MVP right of way on her property. The Spread H EI and the VADEQ conducted an inspection on 9/24/2021 and did not observe any off right of way impacts. Another inspection was conducted on 9/28/2021 by representatives from the ACOE and VADEQ and no resources appeared to be impacted during the inspection. The ESC measures were observed to be installed and functional at the time of the inspection).											
Total Number of Right of Way Impacts Caused by Third Parties: 0											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): 0											
Total Number of Off Right of Way Impacts: 3 (Three off right of way impacts were observed (noted on punchlist under 1 item due to these areas discharging into the same off right of way flow path) on 9/22/2021 as a result of a prolonged storm event with periods of high intensity/short duration rainfall. This storm event produced approximately 4.9 inches in 23 hours. Temporary ESC measures have been installed and multiple extension requests have been approved by the VADEQ due to saturated conditions). Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations below for further discussion.											
Total Number of Environmental Resource Impacts: 0											
Total Number of ESC Measures in Need of Routine Maintenance Not Maintained Within Timeframes Required by MVP's Annual Standards and Specifications or as Otherwise Provided in the Consent Decree: 0											
Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 9/20/2021 through 9/30/2021.											
CARRY OVER ITEMS FROM 9/19/2021											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
11/12/2020	2.4"-4.0" - 22 Hours *Remnants of Hurricane Eta continuing from 11/11/2020	1					1	1 on 11/12, 11/18, 11/25, 12/9/, 12/17, 12/23, 12/30/2020, 1/6/, 1/13, 1/20, 1/27, 2/3/, 2/10, 2/17, 2/24, 3/10, 3/17, 3/23, 3/31, 4/7, 4/13, 4/21, 4/28, 5/5, 5/12, 5/19, 6/2, 6/9 and 6/16, 7/15, 8/16, and 9/16/2021 to be completed on 10/17/2021			Engineering design being prepared for slide impact area and awaiting landowner permission. A long term extension approval has been granted.
8/16/2021	0.6"-4.2" - 9 Hours Heavy storm events with high intensity/short duration rainfall occurred late 8/15/2021	1		1				1 on 8/17/2021 (Off right of way impact extended indefinitely until landowner permission is granted)			One item is awaiting landowner permission for off right of way access. The ESC measures were repaired/maintained and enhanced. No resources were impacted. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event.
8/18/2021	0.5"-1.6" - 4 Hours *Isolated high intensity/short duration storm events (remnants of Tropical Storm Fred) occurred late on 8/17/2021	1		1				1 on 8/19/2021 (Off right of way impact extended indefinitely until landowner permission is granted)			One item is awaiting landowner permission for off right of way access. The ESC measures were repaired/maintained and enhanced. No resources were impacted. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude
8/20/2021	0.1"-1.9" - 2 Hours *Isolated high intensity/short duration storm events occurred late on 8/19/2021	11	2	9				11 on 8/21/2021 (9 off right of way and 2 resource impacts extended indefinitely until landowner permission is granted)	1 on 9/21/2021 (S-IJ12/W-MN7 Ext. Request)		Eleven items are awaiting landowner permission for off right of way access and one of those items has been completed within the required timeframe per a VADEQ approved indefinite extension request. The identified item (S-IJ12/W-MN7) was evaluated by the VADEQ on 9/21/2021 and determined that no impacts were visible at the time of the inspection. A Declaration of Force Majeure was submitted to the VADEQ on August 26, 2021 due to the magnitude of the storm event. Ten items remain under indefinite extensions awaiting landowner permission.

ENVIRONMENTAL INSPECTOR OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
9/20/2021	0.0" - 0.6" - 3 Hours *Rainfall occurred on 9/19/2021	4					4		1 on 9/20/2021	3 on 9/21/2021	Four items were identified requiring repair/maintenance and completed within the required timeframe.
9/22/2021	2.3"-4.9" - 23 Hours *Prolonged storm event with intervals of high intensity/short duration rainfall began on 9/21/2021	22		*1 (*3 impacted locations noted as one due to above slope failure impacting one general area)			21	3 on 9/23, 9/25, 9/26, and 9/27, 9/28, 9/29, and 9/30/2021 to be completed on 10/1/2021 1 on 9/23, 9/24, 9/25, 9/26, 9/27, 9/28, 9/29, and 9/30/2021 to be completed on 10/1/2021 (Off right of way impact) 8 on 9/25/2021 to be completed on 9/28/2021	3 on 9/22/2021 1 on 9/30/2021	7 on 9/23/2021 7 on 9/27/2021 1 on 9/28/2021	Twenty-two items were identified requiring repair/maintenance and 19 were completed within the required timeframe. One of the identified items was an off right of way sediment impact approximately 1,500 feet off right of way within an upland area. Two adjacent locations due to an upslope failure were also overwhelmed resulting in additional off right of way impacts to the same 1,500 feet item. An Agency Compliance Form (Problem Area Report #688) was submitted by the EI on 9/22/2021. Three items received extension requests approvals. Temporary ESC measures have been installed and multiple extension requests have been approved by the VADEQ due to wet conditions.
9/23/2021	0.3"-2.1" - 13 Hours *Rainfall event from 9/21/2021 occurred on 9/22/2021	11					11	1 on 9/23, 9/25, 9/26, and 9/27/2021 to be completed on 9/29/2021 2 on 9/26/2021 to be completed on 9/29/2021 1 on 9/26 and 9/29/2021 to be completed on 10/2/2021	1 on 9/28/2021	4 on 9/23/2021 2 on 9/24/2021 1 on 9/25/2021 2 on 9/27/2021	Eleven items were identified requiring repair/maintenance and 10 were completed within the required timeframe. One item received extension request approvals.
9/24/2021		2 (Env. Auditor)					2			1 on 9/25/2021 1 on 9/26/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.
9/27/2021		7					7			5 on 9/28/2021 2 on 9/29/2021	Seven items were identified requiring repair/maintenance and completed within the required timeframe.
9/29/2021		1					1			1 on 9/30/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
VADEQ OBSERVATIONS											
DATE OF OBSERVATION	PRECIPITATION AMOUNT AND DURATION	TOTAL NUMBER OBSERVATIONS	ENVIRONMENTAL RESOURCE IMPACT	OFF RIGHT OF WAY IMPACT	RIGHT OF WAY IMPACTS CAUSED BY WEATHER RELATED DAMAGE	RIGHT OF WAY IMPACTS CAUSED BY THIRD PARTIES	MAINTENANCE/ REPAIR	TOTAL NUMBER EXTENSION REQUEST(S)	DATE COMPLETED 24-HOURS	DATE COMPLETED THREE DAYS	SUMMARY OF OBSERVATIONS
9/21/2021		1					1			1 on 9/23/2021	One item was identified requiring repair/maintenance and completed within the required timeframe.
9/28/2021		1					1				One item was identified requiring repair/maintenance and has three days to be completed within the required timeframe.
9/29/2021		2					2			2 on 9/29/2021	Two items were identified requiring repair/maintenance and completed within the required timeframe.

LANDOWNER/THIRD PARTY REPORTED COMPLAINTS			
DATE OF OBSERVATION	NEAREST ROAD OR FEATURE	TOTAL NUMBER OBSERVATIONS	SUMMARY OF OBSERVATIONS
9/21/2021 (Photo Log depicts 9/2/2021)	Webster Corner Road (GAS)	1	A third party complaint was submitted to the VADEQ on behalf of a landowner. The undated report which was received by MVP on 9/21/2021 alleges "continuing problems" related to "Stormwater runoff from the right of way". The complainant's narratives affiliated with the photo log provide incorrect information regarding the right of way topography, drainage and functionality of the installed ESC measures. The off right of way property to the north (not fully shown within the complainant's report) is currently in grassed conditions and void of forested conditions which appear to be a result of previous logging activities. This location drains directly to the west into the landowner's existing disturbed road which runs parallel to the right of way. This existing landowner access road (not part of the MVP project) appears to have been graded in a cut condition and remains in a disturbed condition per previous site evaluations. The project right of way is currently stabilized with soil stabilization blanket (SSB)/vegetation, temporary waterbars, and permanent waterbars/end treatments. The Environmental Auditor observed no off right of way stormwater-related impacts from the right of way at the time of the evaluation.
9/22/2021	Bottom Creek Road (GAS)	1	A landowner complaint was submitted to the VADEQ on 9/23/2021 (IR #301005). The complainant alleged that erosion and sediment was leaving the MVP right of way on her property. The Spread H EI and the VADEQ conducted an inspection on 9/24/2021 and did not observe any off right of way impacts. Another inspection was conducted on 9/28/2021 by representatives from the ACOE and DEQ and no resources appeared to be impacted during the inspection. The ESC measures were observed to be installed and functional at the time of the inspection.

ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS		
DATE OF OBSERVATION	OBSERVATIONS	CONCLUSION AND RECOMMENDATIONS
9/20/2021	The Environmental Auditor conducted site evaluations at MVP-RO-287 (CIS/GAS) and Bottom Creek Road (GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI and EI regarding recommendations related to repair/maintenance and installing enhanced ESC measures.
9/21/2021	The Environmental Auditor conducted site evaluations at MVP-FR-292 (CIS) and MVP-RO-282.	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI and the MVP Environmental staff regarding continued recommendations related to proper soil stabilization blanket installation.
9/22/2021	The Environmental Auditor conducted site evaluations at the following locations: MVP-RO-286 (GAS), MVP-RO-281 (CIS) and MVP-FR-291 to MVP-FR-292.	The Environmental Auditor conducted a post rainfall event evaluation and observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor observed ESC measures overwhelmed and damaged due to a rainfall event producing approximately 4.9 inches in 23 hours with intervals of high intensity/ short duration storm events. The Environmental Auditor communicated with the Spread H EI and the MVP Environmental staff regarding recommendations for waterbar installation protocol and installing enhanced ESC measures with an emphasis placed on completing the pipeline installation and final restoration.
9/24/2021	The Environmental Auditor conducted site evaluations at Webster Corner Road (GAS) and MVP-RO-282 (CIS).	The Environmental Auditor observed locations where ESC and PCSM measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI and EI regarding recommendations related to repair/maintenance and installing enhanced ESC measures.
9/27/2021	The Environmental Auditor conducted site evaluations at Yellow Finch Lane/MVP-MN-278.01 (CIS) and MVP-RO-282 (GAS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Spread H EI regarding continued recommendations related to ESC measure repair/maintenance.
9/28/2021	The Environmental Auditor conducted a site evaluation at MVP-MN-276.03 (CIS).	The Environmental Auditor observed locations where ESC measures were installed and functional at the time of the evaluation.
9/29/2021	The Environmental Auditor conducted a site evaluation at MVP-FR-291 (GAS).	The Environmental Auditor observed continued ESC measures repairs on the steep slope following the high intensity/short duration storm event that occurred on 9/22/2021.
9/20/2021 through 9/30/2021	The Environmental Auditor reviewed and noted the daily MVP Punchlists, ODCP Inspection Reports, and SWPPP Inspection Reports to be compliant during this reporting period for the Spread H Project.	The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and installing enhanced ESC measures as needed. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector, the Spread H Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity.

REQUIRED FINDINGS AND CONCLUSIONS		
	Yes/No	If No, provide explanation and recommendation for corrective action (if any).
Best management practices for the Project are in accordance with MVP's Annual Standards and Specifications and MVP's Site Specific ESC and SWM Plans?	Yes	
The temporary erosion and sediment control measures are properly installed, inspected, and maintained?	Yes	
All Ineffective Temporary Erosion and Sediment Control Measures are repaired and ESC Measures in Need of Routine Maintenance are maintained within the required timeframes ?	Yes	