



**Mountain Valley Pipeline Project  
Environmental Auditor  
Quarterly Reports for Q3 2024  
October 15, 2024**

James J. Golden  
DEQ Director of Regional Operations  
Piedmont Regional Director  
Virginia Department of Environmental Quality  
P.O. Box 1105  
Richmond, VA 23218

Robert Pichardo  
Senior Environmental and Regulatory Counsel  
EQT Corporation  
2200 Energy Drive  
Canonsburg, PA 15317

Dear Mr. Golden and Mr. Pichardo:

Please find the Q3 2024 Environmental Auditor Quarterly Reports including the required Bi-Weekly Reports per my review of the Mountain Valley Pipeline (MVP). These reports are provided in accordance with the Consent Decree between the Department of Environmental Quality (DEQ) and MVP. Separate reports are included for each Virginia construction spread (G, H, and I).

As you are aware, the Consent Decree requires that the Environmental Auditor prepare multiple reports. The Quarterly Report for Q3 2024 is due on or before October 15, 2024. Additionally, bi-weekly reports are to be prepared and attached to the quarterly reports.

Sincerely,

A handwritten signature in black ink that reads 'Joe Crea'.

Joe Crea, CPESC, CPSWQ  
Tetra Tech

# **Mountain Valley Pipeline Project – Spread G**

## **Environmental Auditor Quarterly Report for Q3 2024**

### **October 15, 2024**

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#### **Environmental Auditor Contact Information**

Joe Crea, CPESC, CPSWQ  
Tetra Tech  
661 Anderson Drive, Suite 200  
Pittsburgh, Pennsylvania 15220

#### **I. Introduction**

The Spread G (Construction Spread 8 and a portion of Spread 9) portion of the Mountain Valley Pipeline Project H-600 (Project) within the state of Virginia begins at approximate station 10377+20 in Giles County and ends at approximate station 12005+00 in Montgomery County. The Spread G Project includes right of way for the pipeline, laydown yards, additional temporary workspaces (ATWS), and temporary/permanent access roads. Spread G is located in Giles, Craig, and Montgomery Counties with approximately 3.5 miles located within the Jefferson National Forest (JNF).

As required by the Virginia Erosion and Stormwater Management Act, 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 G Project to include a Lead Environmental Inspector (LEI) and a staff of Environmental Inspectors (EIs). The LEI/EIs obtained the Virginia Department of Environmental Quality (VADEQ) Erosion and Sediment Control (ESC)/Stormwater Management (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 Best Management Practices (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. This reporting period covers July 1, 2024, through September 30, 2024 (Q3 reporting period).

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

- Giles, Craig, and Montgomery Counties
  - 10377+20-10458+89 - Includes Jefferson National Forest
  - 10458+89-10479+81
  - 10479+81-10487+29 - Includes Jefferson National Forest
  - 10487+29-11524+16
  - 11524+16-11600+01 - Includes Sinking Creek Mountain (Jefferson National Forest)
  - 11600+01-11618+91
  - 11618+91-11669+87 - Brush Mountain (Jefferson National Forest)
  - 11669+87-12005+00
  - Laydown Yards: LY-026, LY-028, and LY-029

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

10377+20 to 12005+00 (includes permanent access roads)

\*It should be noted that from 9/24/2024 through 9/27/2024, severe rainfall events leading up to and including remnants from Hurricane Helene caused severe erosion and sloughing impacts throughout approximately 33,454 feet of the right of way within Giles and Montgomery Counties. As a result of the impacts, additional contractor staff including heavy equipment will be mobilized to conduct permanent repairs/enhancements. Repair and restabilization activities will entail the use of previously restored access roads and reinstalling temporary bridges across environmental resources to access the impacted areas. These activities will be summarized in the Q4 2024 report.

## **II. Information Reviewed to Prepare Quarterly Report**

The Environmental Auditor utilized the following provided resources/information to assist with evaluating project compliance throughout the Q3 reporting period:

- Daily MVP Punch Lists (includes VADEQ findings);
- Environmental Auditor Bi-Weekly Reports;
- Frequent Communication with the MVP Environmental staff, Chief EI, LEI, and Environmental Coordinator (EC);
- Stormwater Pollution Prevention Plan VSIRs;
- Spread G Rain Gauge Data;
- Spread G Scatter Sheets (Contractor Available Resources and Daily Work Locations);
- Annual Project Specific Standards and Specifications (AS&S);
- Oil Discharge Contingency Plan (ODCP) Inspection reports;
- Stormwater Pollution Prevention Plans, Erosion and Sediment Control Plans, and Post Construction Stormwater Management Plans;
- MVP 48-Hour Aquatic Resource Notifications;
- VA Off Right of Way Sediment Impact Tracker Spreadsheet;
- Notice of Force Majeure Declaration submitted to the VADEQ on 7/15/2024, 7/28/2024, 8/2/2024, 8/19/2024, 9/9/2024, 9/29/2024 (Courtesy Notice of Force Majeure Declaration), and 9/30/2024;
- Agency Compliance Forms - Problem Areas Reports (PARs) and Noncompliance Reports (NCRs); and
- Landowner/Third party complaints received by the VADEQ on 5/30/2024 (reported in Q2 2024), 7/7/2024, 8/6/2024, and 8/7/2024 (Source: VADEQ website)

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

The following sections III. through VI. provide an overall summary for the 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 G-1A, the EIs observed a total of 1,033 daily MVP punchlist items (includes Carry Over items) requiring repair/maintenance throughout the Q3 reporting period. The Environmental Auditor noted 7 items identified by the EIs as ESC measures damaged due to impacts caused by third party activities related to livestock traffic, landowner traffic, and agricultural mowing activities. The ESC measures were subsequently repaired/maintained within the required timeframes and no environmental resources were impacted due to the third-party impacts. The ESC measures were subsequently repaired/maintained within the required timeframes and no environmental resources were impacted due to the third-party impacts.

During the Q3 reporting period the Spread G Environmental inspection staff observed 152 off right of way impacts within upland locations and 26 environmental resource impacts: three separate impacts at S-A32 (Kow Camp Road #1), S-HH18 (MVP-GI-234/JNF), four separate impacts at S-MN21 (FR-188/Mt. Tabor Road), two separate impacts at S-EF65 (Mt. Tabor Road), S-IJ52 (Mt. Tabor Road), S-IJ19/S-IJ19 (MVP-GI-244), two separate impacts S-IJ16b (MVP-GI-244), two separate impacts at S-P6 (Gravelly Hill Road/MVP-GI-237), S-MM18 (Highway 42), three separate impacts at S-NN12 (Seven Oaks Road/MVP-GI-253.02), S-NN11 (Old Furnace Road/MVP-GI-256, S-Q14 (MVP-GI-234), S-MM17/W-MM10 (Seven Oaks Road/MVP-GI-253.02, S-YZ1 (MVP-GI-241.03), S-G32 (Buffalo Anklets Road/MVP-GI-241.04), and S-RR5 (MVP-GI-244).

On 7/1/2024, the EIs observed two off right of way sediment impacts up to 15 feet within upland areas at the MVP-GI-249 access road and east of Kow Camp Road #1. As reported in the Q2 2024 report, on 6/29/2024, storm events with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment/gravel removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. The EIs submitted Agency Compliance Forms (Problem Area Reports # 951 and # 952) on 7/1/2024. **Refer to Section VI. for further discussion.**

On 7/6/2024, the EIs observed 17 off right of way sediment impacts up to 500 feet within upland areas throughout Giles and Montgomery Counties. On 7/5/2024, strong thunderstorms with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC and SWM measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframes via extension request approvals. No environmental resources were impacted from 15 of the off right of way impacts; however, two environmental resources were subsequently impacted (S-A32 west of Kow Camp Road #1 and S-EF65 west of Mt. Tabor Road) from two of the off right of way impacts. The LEI and EIs submitted Agency Compliance Forms (PARs #957, #961, #963, #964, and #965) on 7/6/2024 and (PAR #970) on 7/7/2024. **Refer to Section VI. for further discussion.**

On 7/6/2024, the EIs observed 6 environmental resource impacts at S-A32 west of Kow Camp Road #1, S-HH18 east of Craig Creek Road within the JNF, S-MN21 west of Mt. Tabor Road, S-EF65 (two separate locations) west of Mt. Tabor Road, and S-IJ52 west of Mt. Tabor Road. It should be noted that approximately 1,000 feet of the stream was impacted at one of the S-EF65 locations. On 7/5/2024, strong thunderstorms with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ and United States Forest Service (USFS) were immediately notified, landowner access granted, ESC measures replaced and enhanced, and sediment removed from the streams within the required timeframe. On 7/6/2024, the LEI and EIs submitted Agency Compliance Forms (PARs #959, #960, #962, and #968). The EI submitted an Agency Compliance Form (NCR #958) due to the contractor not installing ESC measures on a portion of the travel lane above S-IJ52 prior to the storm events. A Notice of Force Majeure Declaration for S-A32 (100 feet), S-HH18, S-MN21, and S-EF65 was submitted to the VADEQ on 7/15/2024. **Refer to Sections VI. and VII. for further discussion.**

On 7/8/2024, the Environmental Auditor observed one off right of way sediment impact approximately 30 feet within an upland areas west of Mt. Tabor Road. On late 7/5/2024, strong thunderstorms with high intensity/short duration rainfall caused ESC measures to become overwhelmed. The Environmental

Auditor met with the onsite EI to review the observation, and it was added as a corrective action to the daily MVP Punchlist. The VADEQ was immediately notified, landowner access granted, ESC and SWM measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. **Refer to Section VI. for further discussion.**

On 7/12/2024, the EI observed the contractor crew filling in a sump pit with no perimeter sediment controls installed causing an off right of way sediment impact within an upland area west of MVP-GI-234 within the JNF. The USFS was immediately notified and the ESC measures replaced. On 7/12/2024, the EI observed the contractor crew filling in a sump pit with no perimeter sediment controls installed causing an off right of way sediment impact within an upland area west of MVP-GI-234 within the JNF. The USFS was immediately notified and the ESC measures replaced. Due to the minimal amount of sediment, removal was not warranted or practicable. The LEI submitted an Agency Compliance Form (NCR #976) on 7/12/2024. It should be noted that this item was not reported in the daily MVP Punchlist. **Refer to Section VII. for further discussion.**

On 7/18/2024, the EIs observed 6 off right of way sediment impacts up to 75 feet within upland areas west of Steele Acres Road/MVP-GI-258.01. From 7/17/2024 into early 7/18/2024, strong storm events with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed due to improperly installed temporary waterbars. The VADEQ was immediately notified, landowner access granted, ESC measures properly installed/repared, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. An Agency Compliance Form (NCR #977) was submitted by the LEI on 7/18/2024. **Refer to Sections VI. and Section VII. for further discussion.**

On 7/21/2024, the EI observed two off right of way sediment impacts approximately 20 feet within upland areas west of Mt. Tabor Road. On 7/20/2024, a storm event with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized, within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR # 985) on 7/21/2024. **Refer to Section VI. for further discussion.**

On 7/21/2024, the EI observed an environmental resource impact at S-MN21 west of Mt. Tabor Road. On 7/20/2024, a storm event with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures repaired/enhanced and sediment removed within the required timeframe. The LEI submitted an Agency Compliance Form (PAR # 983) on 7/21/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 7/28/2024.

On 7/22/2024, the EI observed an off right of way sediment impact traveling approximately 200 linear feet parallel to the right of way up to 15 feet beyond the right of way within an upland area west of Cascade Drive. On 7/20/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures temporarily repaired/enhanced, sediment removed, and the area stabilized within the required timeframe. It should be noted that runoff from the permanent waterbar end treatments contributed to the impact. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #986) on 7/22/2024. **Refer to Section VI. for further discussion.**

On 7/23/2024, the EIs observed 5 off right of way sediment impacts up to 50 feet within upland areas west of Steele Acres Road/MVP-GI-258.01 (4) and Collins Road (1). On 7/22/2024 and 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #997) on 7/23/2024. **Refer to Section VI. for further discussion.**

On 7/23/2024, the EIs observed two environmental resource impacts at the confluence of S-IJ19/S-IJ18 at MVP-GI-244 (access road) and S-MN21 west of Mt. Tabor Road. On 7/22/2024 and 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. At S-IJ19/S-IJ18, approximately 30 feet of the stream was impacted off right of way. Runoff from the right of way above the access road caused gravel/sediment to washout on the access road. At S-MN21, it appeared that runoff from the permanent waterbar end treatments contributed to this impact. The VADEQ was immediately notified, landowner access granted, the ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe via an extension request approval due to wet conditions. The LEI submitted Agency Compliance Reports (PARs #998 and #999) on 7/23/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 8/2/2024. **Refer to Section VI. for further discussion.**

On 7/24/2024, the EIs observed two off right of way sediment/gravel impacts at MVP-GI-249 (access road) and west of MVP-GI-256.02 up to 75 feet respectively, within upland areas. On 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. At MVP-GI-249, gravel washout occurred from the access road. At MVP-GI-256.02, sediment deflected off right of way from a sediment control (foam silt dike). The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment/gravel removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Report (PAR #997) for MVP-GI-249 on 7/23/2024. The LEI submitted an Agency Compliance Form (PAR #1006) for MVP-GI-256.02 on 7/24/2024.

On 7/24/2024, the LEI observed an environmental resource impact at S-IJ16b east of MVP-GI-244. On 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed resulting in the streambank to slough, subsequently impacting approximately 100 feet of the stream off right of way. The VADEQ was immediately notified, landowner access granted, the ESC measures were repaired/enhanced, sediment removed, and the impacted areas stabilized. It should be noted that from the permanent waterbar end treatments contributed to the impact. The LEI submitted Agency Compliance Form (PAR #1008) on 7/24/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 8/2/2024. **Refer to Section VI. for further discussion.**

On 8/9/2024, the EIs observed four off right of way sediment impacts up to 40 feet within upland areas east of Stevers Gap Trail (3) and west of Hendrickson Road (1). On 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC/SWM measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1020) on 8/9/2024. **Refer to Section VI. for further discussion.**

On 8/9/2024, the LEI observed an environmental resource impact at S-IJ16b east of MVP-GI-244. On 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby caused ESC and SWM measures to become overwhelmed resulting in the streambank sloughing into the stream. It should be noted that runoff from the permanent waterbar end treatments contributed to the impact. The VADEQ was immediately notified, ESC measures enhanced via engineering redlines, and sediment removed within the required timeframe via an extension request approval. The LEI submitted Agency Compliance Form (PAR #1021) on 8/9/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 8/19/2024. **Refer to Section VI. for further discussion.**

On 8/19/2024, the EIs observed three off right of way sediment impacts up to 15 feet within upland areas west of MVP-AR-234. On 8/17/2024, a storm event with high intensity short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe via an extension request approval. No environmental resources were impacted. The LEI

submitted an Agency Compliance Form (PAR #1030) on 8/19/2024. **Refer to Section VI. for further discussion.**

On 8/30/2024, the EIs observed 7 off right of way sediment impacts up to 30 feet within upland areas east of Gravely Hill Road (6) and east of MVP-GI-238.01 (1). On 8/29/2024, a strong storm event with high intensity short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1032) on 8/30/2024. **Refer to Section VI. for further discussion.**

On 8/30/2024, the EI observed an environmental resource impact at S-P6 east of Gravely Hill Road. The strong storm event on 8/29/2024 caused ESC measures to become overwhelmed subsequently impacting approximately 50 feet of the stream off right of way. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe. The LEI submitted an Agency Compliance Form (PAR #1034) on 8/30/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 9/9/2024. **Refer to Section VI. for further discussion.**

On 9/1/2024, the EIs observed 37 off right of way sediment impacts up to 200 feet within upland areas west of MVP-GI-234 (6), east of MVP-GI-237 (3), east of Gravely Hill Road (1), east of MVP-GI-238.01 (2), east of Highway 42 (11), east of Seven Oaks Road/MVP-GI-253.02 (11), and west of Old Furnace Road/MVP-GI-256.02 (3). On 8/31/2024, strong storm events with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted at 33 locations, ESC and SWM measures repaired/maintained and enhanced, sediment removed, and the areas stabilized within the required timeframes via extension request approvals. Four of the locations received indefinite extension request approvals until landowner permission is granted. The LEI submitted Agency Compliance Forms (PARs #1039, #1040, #1041, and #1042) on 9/1/2024. **Refer to Section VI. for further discussion.**

On 9/1/2024, the EIs observed four environmental resource impacts at S-P6 east of Gravely Hill Road, S-MM18 east of Highway 42, S-NN12 east of Seven Oaks Road/MVP-GI-253.02, and S-NN11 west of Old Furnace Road/MVP-GI-256. The strong storm events on 8/31/2024 caused ESC and SWM measures to become overwhelmed. At S-P6, approximately 20 feet of the stream was impacted. At S-MM18, approximately 25 feet of the stream was impacted. At S-NN12, approximately 300 feet of the stream was impacted. At S-NN11, approximately 100 feet of the stream was impacted. The VADEQ was immediately notified, landowner access granted, sediment removed, impacted upland areas stabilized, and the ESC measures repaired/replaced and enhanced within the required timeframe via extension request approvals due to unsafe/wet conditions. The LEI submitted Agency Compliance Forms (PARs #1035, #1036, #1037, and #1038) on 9/1/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 9/9/2024. **Refer to Section VI. for further discussion.**

On 9/3/2024, the EI observed two off right of way sediment impacts up to 10 feet within upland areas east and west of Old Furnace Road/MVP-GI-256.02. On 8/31/2024, strong storm events with high intensity short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframes with one location receiving an extension request approval. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1043) on 9/3/2024. **Refer to Section VI. for further discussion.**

On 9/5/2024, the EI observed two off right of way sediment impacts approximately 5 feet and 10 feet within upland areas west of MVP-GI-234. On 8/31/2024, strong storm events with high intensity short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas

stabilized within the required timeframe. No environmental resources were impacted. **Refer to Section VI. for further discussion.**

On 9/19/2024, the EI observed an off right of way sediment impact approximately 10 feet within an upland area west of Stevers Gap Trail. From 9/18/2024 into early 9/19/2024, a storm event from a tropical system with intervals of high intensity/short duration rainfall coupled with previous rainfall and saturated ground conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted.

On 9/20/2024, the EIs observed three off right of way sediment impacts up to 100 feet within upland areas east of MVP-MN-266 (2) and east of Kow Camp Road #1 (1). On 9/19/2024, strong storm events in a short duration coupled with existing saturated conditions caused ESC measures to become overwhelmed at MVP-MN-266. At one of the off right of way locations the sediment subsequently impacted a Karst feature. The Spread G environmental inspection staff, MVP Environmental staff, and Karst geologist have been communicating/coordinating with VA Department of Conservation and Recreation pertaining to this issue. At Kow Camp Road #1, the storm event caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, sediment removed, ESC measures repaired/enhanced, and the areas stabilized within the required timeframe. No environmental resources were impacted at two of the locations; however, the off right of way impact at Kow Camp Road #1 subsequently resulted in an environmental resource impact to S-A32. The LEI submitted Agency Compliance Forms (PAR #1048 and #1049) on 9/20/2024. **Refer to Section VI. for further discussion.**

On 9/20/2024, the EI observed an environmental resource impact at S-A32 west of Kow Camp Road #1. On 9/19/2024, strong storm events in a short duration coupled with existing saturated conditions caused ESC measures to become overwhelmed and subsequently impacting approximately 50 feet of the stream. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe. The LEI submitted an Agency Compliance Form (PAR #1048) on 9/20/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 9/30/2024. **Refer to Section VI. for further discussion.**

On 9/25/2024, the EIs observed 45 off right of way sediment impacts up to 100 feet within upland areas throughout Giles (44) and Montgomery Counties (1). It should be noted that three of the impacts were located within the JNF. On 9/24/2024, storm events with high intensity/short duration rainfall caused extensive erosion and areas of sloughing resulting in ESC and SWM measures to become overwhelmed. The VADEQ and USFS were immediately notified, landowner access granted, ESC measures temporarily repaired/enhanced, sediment removed, and the areas stabilized at 17 locations. The remaining 28 locations received extension request approvals due to hazardous/saturated conditions. The LEI submitted Agency Compliance Forms (PARs #1057, #1058, #1059, #1063, and #1064) on 9/25/2024. It should be noted that two of the off right of way impacts at MVP-AR-234 (access road) and east and west of Kow Camp Road #1 resulted in environmental resource impacts at S-Q14 and S-A32, respectively. **Refer to Section VI. for further discussion.** Further documentation will be provided in the Q4 2024 report.

On 9/25/2024, the EIs observed 5 environmental resource impacts at S-Q14 below MVP-GI-234 (access road), S-MM17/W-MM10 below MVP-GI-253.02 (access road), S-NN12 east of MVP-GI-253.02, and S-A32 west of Kow Camp Road #1. The strong storm events on 9/24/2024 caused ESC and SWM measures to become overwhelmed. Based on a site evaluation at Kow Camp Road #1, the Environmental Auditor observed severe erosion on the slope above S-A32 and it appeared that runoff from the permanent waterbars and end treatments contributed to the erosion. The VADEQ was immediately notified and these items received extension request approvals due to hazardous/saturated conditions. The Environmental Auditor conducted a site evaluation at MVP-GI-234 on 9/25/2024, and observed the contractor staff conducting repairs to the access road and installing temporary ESC measures. The LEI submitted Agency Compliance Forms (PARs #1053, #1054, #1055, and #1056) on



9/25/2024. The MVP Environmental staff submitted a Courtesy Notice Force of Majeure Declaration on 9/29/2024. **Refer to Section VI. for further discussion.** Further documentation will be provided in the Q4 2024 report.

On 9/26/2024, the EI observed an off right of way sediment impact approximately 15 feet within an upland area west of Cascade Drive. From 9/25/2024 through 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified and an extension request was approved due to hazardous/saturated conditions. No environmental resources were impacted. It should be noted that previous issues occurred at this location and an engineering review will be conducted to implement permanent/enhanced measures. Based on a previous field evaluation conducted by the Environmental Auditor, it appeared that runoff from the permanent waterbar end treatments is contributing to the redundant impacts. **Refer to Section VI. for further discussion.** Further documentation will be provided in the Q4 2024 report.

On 9/26/2024, the EIs observed two environmental resource impacts at S-MN21 west of Mt. Tabor Road and S-YZ1 at MVP-GI-241.03 (access road). The storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused extensive erosion on the right of way resulting in the ESC measures becoming overwhelmed subsequently impacting S-MN21. Extensive runoff at MVP-GI-241.03 caused the access road to washout overwhelming the ESC measures and subsequently impacting S-YZ1. The VADEQ was immediately notified, landowner access granted, the access road repaired, ESC measures repaired/enhanced, and the gravel removed from S-YZ1 within the required timeframe via an extension request approval. An extension request was approved for S-MN21 due to hazardous/saturated conditions. The LEI submitted Agency Compliance Forms (PARs #1065 and #1079) on 9/26/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024. Further documentation will be provided in the Q4 2024 report.

On 9/27/2024, the EI observed an environmental resource impact at S-G32 east of Buffalo Anklets Road/MVP-GI-241.04. The storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused extensive erosion on the right of way resulting in the ESC and SWM measures becoming overwhelmed. It should be noted that the Environmental Auditor evaluated this location on 9/25/2024 and observed runoff from the permanent waterbars and end treatments contributing to the erosion. The VADEQ was immediately notified and an extension request was approved due to hazardous/saturated conditions. The LEI submitted an Agency Compliance Form (PAR #1067) on 9/27/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024. **Refer to Section VI. for further discussion.** Further documentation will be provided in the Q4 2024 report.

On 9/28/2024, the EIs observed three off right of way sediment impacts up to 20 feet within upland areas west of MVP-GI-234 (1) and east of Gravely Hill Road (2). From 9/25/2024 through 9/27/2024, a prolonged storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access was granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized east of Gravely Hill Road within the required timeframe. The remaining two areas west of MVP-GI-234 received extension request approvals due to hazardous/saturated conditions. No environmental resources were impacted. The Environmental Coordinator submitted an Agency Compliance Form (PAR #1072) on 9/28/2024. Further documentation will be provided in the Q4 2024 report.

On 9/29/2024, the EIs observed 7 off right of way sediment impacts up to 30 feet within upland areas west of MVP-GI-244 (1), east and west of MVP-GI-253.02 (3), and west of MVP-GI-256.02 (3). From 9/25/2024 through 9/27/2024, storm events up to and including remnants from Hurricane Helene coupled with saturated conditions caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access was granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized at one location west of MVP-GI-256.02 within the required timeframe.

The remaining 6 locations received extension request approvals due to hazardous/saturated conditions. It should be noted that the off right of way impact at MVP-GI-244 contributed to an environmental resource impact at S-RR5. The LEI submitted an Agency Compliance Form (PAR #1071) on 9/29/2024. Further documentation will be provided in the Q4 2024 report.

On 9/29/2024, the EIs observed environmental resource impacts at S-NN12 east of MVP-GI-253.02 and S-RR5 west of MVP-GI-244. The storm events leading up to and including remnants from Hurricane Helene caused ESC and SWM measures to become overwhelmed subsequently impacting approximately 100 feet of S-NN12 and the slope to slough resulting in ESC and SWM measures becoming overwhelmed at S-RR5. The VADEQ was immediately notified and extension requests were approved due to hazardous/saturated conditions. The LEI submitted Agency Compliance Forms (PARs #1073 and #1074) on 9/29/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. Further documentation will be provided in the Q4 2024 report.

The following is an additional contractor-related noncompliance event observed by the Spread G Environmental inspection staff that did not result in upland off right of way or environmental resource sediment impacts:

On 8/6/2024, the MVP contractor was using an unauthorized off site rock/soil disposal site per an agreement with the landowner. The material was placed by the contractor within an upland location; however, a stream was impacted via landowner grading over a fill slope. Per MVP, the contractor was informed that no further disposal was permitted at this location. The contractor subsequently stabilized the fill slope and installed ESC measures along the base of the slope. It should be noted that the Spread G Environmental inspection staff was not informed about this agreement and disposal location prior to third party complaints submitted to the Federal Energy Regulatory Commission (FERC) and VADEQ. The LEI submitted an Agency Compliance Form (NCR #1018) on 8/8/2024.

On 9/13/2024, the EI observed soil binders hydraulically applied within 100 feet of stream crossings at S-MM18 west of MVP-GI-253.02 and S-NN12 west of MVP-GI-256.02. The LEI submitted an Agency Compliance Form (NCR #1045) on 9/13/2024. These locations were subsequently restabilized with SSB. The Spread G environmental staff conducted training for the contractor staff to ensure regulations and ESC requirements are being followed. **Refer to Section VII. for further discussion.**

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 the respective Bi-Weekly Reports for further discussion.**

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

**Table G-1A**

Spread G Environmental Inspector Observations: July 1, 2024 - September 30, 2024					
Monthly Observation	Total Number Observations	Environmental Resource Impacts	Off Right of Way Impacts	Right of Way Impacts Caused by Third Parties	Weather Related Damage
July 2024	*427	10	37	0	0
August 2024	*158	2	14	4	0
September 2024	*448	14	101	3	1

\*Includes Carry Over Items

The EIs conducted a total of 251 SWPPP inspections and provided respective VSIRs throughout the Q3 reporting period. Upon review of the SWPPP VSIRs, the EIs observations were documented within the daily MVP Punchlists, communicated to the contractor, and noted issues were repaired/maintained and/or enhanced within the VADEQ approved timeframe (24 Hours/Three Days or as extended by VADEQ

authorization). It should be noted that SWPPP inspections were postponed on 9/27/2024 due to hazardous conditions related to a weather event and the VADEQ was immediately notified.

The EIs conducted ODCP site inspections at Laydown Yard 026 throughout the Q3 reporting period. Twenty-eight inspections were conducted in July, 29 inspections were conducted in August, and 15 inspections were conducted in September. No spills were observed by the ODCP inspectors/EIs throughout the Q3 reporting period. **It should be noted that the refueling tanks have been removed from the laydown yard on 9/19/2024.**

An approximate total of 30 recordable precipitation events occurred during the Q3 reporting period. On 6/29/2024, a storm event produced approximately 0.9 inches of rainfall in 1.5 hours. This event caused ESC measures to become overwhelmed resulting in two off right of way impacts within an upland areas. The impacts were observed by the EIs on 7/1/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

On 7/5/2024, strong storm events produced approximately 1.1-1.85 inches of rainfall in 0.5 hours. These storm events caused ESC and SWM measures to become overwhelmed resulting in 18 off right of way impacts within an upland areas and 6 environmental resource impacts at S-A32, S-HH18, S-MN21, S-EF65 (2), and S-IJ52. The impacts were observed by the EIs on 7/6/2024 with one of the off right of way impact observed on 7/8/2024. **Refer to discussion above, Table G-1B, and Section VI., and Section VII. for further discussion.**

From 7/17/2024 into early 7/18/2024, strong storm events with high/intensity/short duration rainfall produced approximately 0.8 inches of rainfall within 1.5 hours. These storm events caused improperly installed ESC measures to become overwhelmed resulting in 6 off right of way impacts within upland areas. The impacts were observed by the EI on 7/18/2024. **Refer to discussion above, Table G-1B, Section VI., and Section VII. for further discussion.**

On 7/20/2024, a storm event with high intensity/short duration rainfall produced approximately 0.7 inches of rainfall in two hours. This storm event caused ESC measures to become overwhelmed resulting in two off right of way impacts within upland areas and one environmental resource impact at S-MN21. The impacts were observed by the EIs on 7/21/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

On 7/21/2024, a storm event coupled with existing saturated conditions produced approximately 0.5 inches of rainfall within 2 hours. This event caused a slope to slough due to runoff from upslope permanent waterbar end treatments resulting in ESC measures becoming overwhelmed subsequently resulting in an off right of way impact within an upland area. The EI observed the impact on 7/22/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

On 7/22/2024 and 7/23/2024, storm events with high intensity/short duration rainfall produced approximately 1.25-2.1 inches of rainfall in two to five hours. These storm events coupled with existing saturated conditions caused ESC measures to become overwhelmed resulting in 7 off right of way impacts within upland locations and three environmental resource impacts at S-IJ18/S-IJ19, S-MN21, and S-IJ16b. The impacts were observed by the EIs on 7/23/2024 and 7/24/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

On 8/8/2024, a storm event from Tropical Storm Debby with intervals of high intensity/short duration rainfall produced approximately 1.5-2.25 inches of rainfall within 14 hours. This event caused ESC and SWM measures to become overwhelmed resulting in four off right of way impacts within upland areas and one environmental resource impact at S-IJ16b. The impacts were observed by the EIs on 8/9/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

On 8/17/2024, a storm event with high intensity short duration rainfall produced approximately 0.4 inches of rainfall within .25 hours. This event caused ESC measures to become overwhelmed resulting in three off right of way impacts within upland areas. The impacts were observed by the EIs on 8/19/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

On late 8/29/2024, a strong storm event with high intensity/short duration rainfall produced approximately 0.6 inches of rainfall within one hour. This event resulted in ESC and SWM measures becoming overwhelmed resulting in 7 off right of way impacts within upland areas and one environmental resource impact at S-P6. The impacts were observed by the EIs on 8/30/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

On 8/31/2024, strong storm events with high intensity/short duration rainfall produced approximately 1.1-1.2 inches of rainfall in one hour. These events caused ESC and SWM measures to become overwhelmed resulting in 41 off right of way impacts within upland areas and four environmental resource impacts at S-P6, S-MM18, S-NN12, and S-NN11. The impacts were observed by the EIs on 9/1/2024 and 9/3/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

From 9/18/2024 into early 9/19/2024, a storm event from a tropical system with intervals of high intensity/short duration rainfall produced approximately 0.9 inches of rainfall in 8 hours. This event coupled with previous rainfall and saturated conditions caused ESC measures to become overwhelmed resulting in an off right of way impact within an upland area. The impact was observed by the EI on 9/19/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

On 9/19/2024, strong storm events in a short duration produced approximately 0.9 inches of rainfall in .30 hours. This event coupled with previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed resulting in three off right of way impacts within upland areas and one environmental resource impact at S-A32. The impacts were observed by the EIs on 9/20/2024. It should be noted that one of the off right of way impacts at MVP-MN-266 resulted in a Karst feature impact. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

From 9/24/2024 through 9/27/2024, storm events leading up to and including remnants of Hurricane Helene produced approximately 10.75 inches of rainfall throughout area of the project. These storm events coupled with previous rainfall and saturated conditions caused flooding, severe erosion, and slopes to slough. These impacts caused ESC and SWM measures to become damaged/overwhelmed resulting in 56 off right of way impacts within upland areas and 9 environmental resource impacts to S-Q14, S-MM17/W-MM10, two impacts at S-NN12, S-A32, S-MN21, S-YZ1, S-G32, and S-RR5. The impacts were observed by the EIs on 9/25/2024, 9/26/2024, 9/27/2024, and 9/29/2024. **Refer to discussion above, Table G-1B, and Section VI. for further discussion.**

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

Table G-1B

Spread G Precipitation and Duration Rates: July 1, 2024 - September 30, 2024					
July		August		September	
Date Recorded	Rainfall/Snowfall and Approximate Duration	Date Recorded	Rainfall and Approximate Duration	Date Recorded	Rainfall and Approximate Duration
7/1/2024	0.0"-1.1" - 1.5 Hours *Scattered storms with intervals of high intensity/short duration rainfall occurred on 6/29/2024	8/3/2024	0.2"-0.9" - 5 Hours *Rainfall occurred on 8/2/2024	9/1/2024	0.4"-1.5" - 1 Hour *Strong storm events occurred on 8/31/2024
7/5/2024	0.0"-0.4" - 1 Hour *Isolated strong storms occurred on late 7/4/2024	8/5/2024	0.0"-0.7" - 1 Hour *Isolated storms occurred on 8/3/2024	9/17/2024	0.1"-0.6" - 12 Hours *Storm event from a tropical system occurred late on 9/16/2024
7/6/2024	0.8"-1.85" - .5 Hours *Thunderstorms with high intensity/short duration rainfall occurred late on 7/5/2024	8/8/2024-8/9/2024	1.0"-2.5" - 14 Hours *Storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby occurred from 8/8/2024 into early 8/9/2024	9/18/2024	0.0"-1.0" - 10 Hours *Storm event from a tropical system occurred on 9/17/2024
7/9/2024	0.0"-0.7" - .66 Hours *Isolated storm events with intervals of high intensity/short duration rainfall occurred on 7/8/2024	8/17/2024	0.1"-0.45" - 8 Hours *Storm event with locations receiving high intensity/short duration rainfall occurred from 8/16/2024 into 8/17/2024	9/19/2024	0.0"-1.0" - 8 Hours *Storm event from a tropical system occurred late on 9/18/2024 into early 9/19/2024
7/17/2024	0.05"-0.35" - .5 Hours *Scattered strong storm events with intervals of high intensity/short duration rainfall occurred on 7/16/2024	8/19/2024	0.0"-0.2" - 2 Hours *Isolated storm event occurred on 8/17/2024	9/20/2024	0.0"-0.9" - .30 Hours *Isolated strong thunderstorms with high intensity/short duration rainfall occurred late on 9/19/2024
7/18/2024	0.45"-1.2" - 1.5 Hours *Scattered strong storm events with areas receiving high intensity/short duration rainfall occurred on late 7/17/2024 and 7/18/2024	8/20/2024	0.0"-0.4" - 1 Hour *Scattered rainfall occurred on 8/19/2024	9/24/2024	0.0"-0.5" - 4 Hours *Scattered storm events occurred on late 9/23/2024 into early 9/24/2024
7/21/2024	0.2"-1.0" - 2 Hours *Storm events with areas receiving high intensity/short duration rainfall on 7/20/2024	8/30/2024	0.0"-0.6" - 0.25 Hours *A strong thunderstorm with high intensity/short duration rainfall occurred late on 8/29/2024	9/25/2024	1.05"-3.85" - 1 Hour *Strong storms with high intensity/short duration rainfall occurred on 9/24/2024
7/23/2024	0.2"-1.7" - 2 Hours *Storm events with areas of high intensity/short duration rainfall occurred on 7/22/2024			9/26/2024	1.7"-3.5" - 10 Hours *Storm event with intervals of high intensity rainfall occurred on 9/25/2024 into early 9/26/2024
7/24/2024	0.2"-0.55" - 3 Hours *Storm events occurred on 7/23/2024			9/27/2024	0.4"-1.5" - 3 Hours *Storm event from remnants of Hurricane Helene occurred on 9/26/2024
7/26/2024	0.1"-0.5" - 1 Hour *Storm events occurred on 7/25/2024			9/28/2024	0.5"-1.9" - 5 Hours *Storm event from remnants of Hurricane Helene occurred on 9/27/2024
7/30/2024	0.1"-0.2" - 2 Hours *Rainfall occurred on 7/29/2024			9/29/2024	0.1"-1.5" - 5 Hours *Storm event with locations receiving intervals of high intensity/short duration rainfall occurred on late 9/29/2024 into early 9/30/2024
7/31/2024	0.0"-0.25" - .66 Hours *Scattered showers occurred on 7/30/2024				

#### IV. Quarterly Summary of VADEQ Observations

Per Table G-1C, the VADEQ Inspectors observed a total of 5 items requiring ESC repair/maintenance throughout the Q3 reporting period. No items related to third party impacts were identified by the VADEQ throughout the Q3 reporting period. During the Q3 reporting period, the VADEQ did not identify project related off right of way or environmental resource impacts throughout the Spread G project area. **Refer to Table G-1C for further detailed information.**

The items provided by the VADEQ on the daily MVP Punchlists throughout the Q3 reporting period were communicated to the contractor Environmental staff and addressed within the VADEQ approved timeframe (24 hours/Three Days or as extended by VADEQ authorization).

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

**Table G-1C**

Spread G VADEQ Observations: July 1, 2024 - September 30, 2024					
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 2024	1	0	0	0	0
August 2024	1	0	0	0	0
September 2024	3	0	0	0	0

#### **V. Quarterly Summary of Landowner/Third Party Issues**

The Environmental Auditor noted three formal landowner/third party complaints submitted to the VADEQ for the Spread G Project during the Q3 reporting period.

- Per the Closure section of the VADEQ Pollution Investigation Report #314147 dated 7/11/2024 based on a third party complaint received by the VADEQ on 5/30/2024 (Q2 2024), the VADEQ concluded appropriate compliance actions were completed.
- A landowner complaint was observed on 7/5/2024 and filed with the VADEQ on 7/7/2024 (Pollution Investigation Report\_IR #314589). The complainant alleged "sediment from steep slopes" impacted S-EF65 as a result of a "very serious thunderstorm" on 7/5/2024". On 7/6/2024, the EIs observed two off right of way sediment impacts at separate locations within S-EF65 (upstream of right of way and downstream of right of way) west of Mt. Tabor Road. On 7/5/2024, a strong thunderstorm event with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed resulting in the environmental resource impacts. The VADEQ was immediately notified, landowner approval granted, and sediment removed at the upstream location within the required timeframe. Due to the extent of sediment (approximately 1,000 feet) at the downstream location, an extension request was approved by the VADEQ. On 7/11/2024, the VADEQ inspector observed appropriate compliance actions completed and no further compliance issues were observed.
- A third party complaint was observed and filed with the VADEQ on 8/6/2024 (Pollution Investigation Report\_IR #315130). The complainant alleged "boulders and unstabilized soil in a fill area are threatening to impact a stream flowing into the New River "and "believers the site is being used by MVP ". Based on an Agency Compliance Form (Noncompliance Report #1018) submitted by the LEI on 8/8/2024, the contractor was using an unauthorized offsite disposal site per an agreement with the landowner. It should be noted that the contractor did not communicate the agreement with the landowner and the off right of way disposal location with the Spread G Environmental inspection staff. The material was placed within an upland location; however, a stream was impacted via landowner grading over a fill slope. Per MVP, the contractor was informed that no further disposal was permitted at this location. The contractor subsequently stabilized the fill slope and installed ESC measures along the base of the slope. Per the VADEQ website, the VADEQ informed the complainant the off right of way disposal site is not part of the MVP ESC/SWM plans and referred this complaint to the Giles County for local program review. Further coordination is underway between the VADEQ and Giles County to determine applicability of ESC/SWM regulations and responsibility for the disposal site. On 9/4/2024, the site was inspected by the VADEQ and Giles County E&S Program staff. It was determined that the off right of way disturbed area was stabilized, not a regulated activity, and not part of the MVP project. No compliance issues were observed.
- A third party complaint was observed and filed with the VADEQ on 8/7/2024 (Pollution Investigation Report\_IR #315007). The complainant alleged "MVP was disturbing ground" "with

heavy rain expected in this area". On 8/7/2024, the contractor staff was conducting ESC measures maintenance/enhancements in preparation for the upcoming precipitation event from Tropical Storm Debby. Per the Closure section of the IR on 8/12/2024, no compliance issues were observed. **Refer to Section III. And VI. for further discussion.**

## **VI. Quarterly Summary of Environmental Auditor Observations and Recommendations**

Per Table G-1D, the Environmental Auditor conducted 58 site evaluations during the Q3 reporting period and observed locations where Pollution Prevention, ESC, and SWM measures required proper installation, repair/maintenance, or additional (enhanced) measures to be installed.

During the reporting period, the Environmental Auditor evaluated the ESC, SWM, and Pollution Prevention measures throughout the project for proper installation and functionality. The Environmental Auditor also reviewed and provided recommendations related to daily MVP Punchlists, ODCP Inspection reports, and SWPPP VSIRs. The Environmental Auditor communicated technical and administrative observations and recommendations to the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff. Throughout the Q3 reporting period, installation and repair/maintenance recommendations were forwarded to the contractor Environmental staff by the Spread G Environmental inspection staff most recommendations were addressed.

During the Q3 reporting period, the Environmental Auditor evaluated locations throughout the right of way where final cleanup and permanent restoration activities were occurring. The Environmental Auditor focused on proper installation of the SWM measures (right of way and access roads) and site restoration implementation. The Environmental Auditor also conducted evaluations at locations where off right of way and environmental resource impacts occurred throughout the Q3 reporting period. The Environmental Auditor communicated/coordinated with the onsite EIs and LEI on a continued basis to ensure permanent restoration activities were conducted in accordance with the required ESC/SWM Plans and AS&S requirements. The Environmental Auditor frequently communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to conducting proper hydraulic application operations to achieve uniform coverage at the required rates, properly installing SSB, and recognizing locations where concentrated flow resulted in erosive conditions and implemented enhanced ESC measures at such locations. The Environmental Auditor also communicated with the LEI regarding relevant documentation related to SWPPP VSIRs, daily MVP Punchlists, ODCP Inspection reports, and Agency Compliance Forms (PARs/NCRs).

The Environmental Auditor provided the following detailed technical and administrative/documentation recommendations:

### **Technical Recommendations**

- Repair rills/gullies prior to conducting stabilization activities.
- Ongoing communication to install SSB where straw/hydraulic mulch are not effective measures per Section 3.2 of the AS&S requirements. Areas of concern where concentrated runoff has caused erosion are along the inside edge of perimeter sediment controls on slopes, below waterbar end treatments, areas where rills/gullies have formed, and areas where sheet flow transitioned to concentrated flow conditions.
- Upgrading SSB throughout locations where current SSB is an ineffective measure per Section 3.2 of the AS&S due to slope, concentrated flow conditions, and limited functional longevity.
- Ongoing communication to properly install SSB related to anchoring and stapling.
- Evaluate and repair compost filter sock (CFS) where undermining was observed.
- Monitor temporary bridge crossings during active construction activities and enhance ESC measures as necessary.

- Evaluate vegetative growth throughout the right of way and restabilize locations where there is minimal to no vegetative growth. The stabilization process should entail the addition of lime and fertilizer as necessary. The Environmental Auditor also suggested to the LEI, Chief EI, and MVP Environmental staff to consider additional soil amendments to provide sustainable soil fertility. Soil fertility and pH testing is recommended to determine appropriate application rates.

#### **Administrative/Documentation Recommendations**

- Conduct QA/QC to ensure consistency and thoroughness between the daily MVP Punchlists and SWPPP VSIRs.
- Update the off right of way Sediment Tracker data and submit Agency Compliance Forms to the Environmental Auditor following an off right of way/environmental resource impact.
- Communicate third party/landowner complaints, off right of way impacts, and environmental resource impacts to the Environmental Auditor.

The following are Environmental Auditor observations at locations where off right of way and environmental resource impacts occurred throughout the Q3 reporting period. **Refer to the attached Environmental Auditor Bi-Weekly Reports for further information.**

On 7/3/2024, the Environmental Auditor conducted evaluations at MVP-GI-249 (access road) and east of Kow Camp Road #1 where off right of way impacts were observed by the EIs on 7/1/2024. The Environmental Auditor observed the ESC measures repaired/enhanced, gravel/sediment removed, and the areas stabilized. A recommendation was communicated to ensure silt fence is installed per the ESC Plan height requirements.

On 7/8/2024, the Environmental Auditor conducted evaluations west of Mt. Tabor Road and east Craig Creek Road where off right of way and environmental resource impacts were identified by the EIs on 7/6/2024. At MVP-MLV-26, the Environmental Auditor observed the contractor staff conducting ESC/SWM repair/maintenance activities throughout the right of way that included locations where off right of way sediment impacts occurred within upland areas and at the two locations where impacts occurred to S-EF65. Sediment removal was underway within an upland location above S-EF65 and approximately 1,000 feet of the stream channel exhibited heavy sediment deposition. The Environmental Auditor conducted a follow up evaluation on 8/28/2024, and observed the ESC and SWM measures installed and functional, sediment removed, and the previously impacted locations stabilized. At MVP-MN-258.04, the Environmental Auditor observed the contractor staff conducting ESC measures repair/maintenance and removing off right of way sediment at the time of the evaluation. At S-HH18, the ESC measures appeared to be repaired/enhanced, sediment removed, and impacted areas stabilized at the time of the evaluation.

On 7/18/2024, the Environmental Auditor conducted evaluations east and west of Kow Camp Road #1 where the EI observed off right of way impacts within upland areas (including Kow Camp Road) and an environmental resource impact at S-A32 on 7/6/2024. At the time of the evaluation, the Environmental Auditor observed the sediment removed, ESC measures repaired/enhanced, and the areas stabilized. The Environmental Auditor provided recommendations to ensure hydraulic mulch is properly applied per the ESC Plan requirements and installing SSB where erosion occurred on the slope.

On 7/24/2024, the Environmental Auditor conducted and evaluations at S-IJ19/S-IJ18 adjacent to MVP-GI-244 (access road), MVP-GI-249 (access road), and west of Steele Acres Road/MVP-GI-258.01 where the EIs observed an environmental resource impact and off right of way impacts on 7/23/2024. At S-IJ19/S-IJ18, the sediment was removed, ESC measures enhanced, and the area stabilized. The Environmental Auditor provided a recommendation to consider installing SSB within the portion of the right of way where erosion occurred. At MVP-GI-249, the Environmental Auditor observed repairs conducted to the access road and recommended repairing the broad based dips to meet the ESC Plan height requirements. At Steele Acres Road, the Environmental Auditor observed the ESC measures repaired, sediment removed, and the areas stabilized. The Environmental Auditor communicated



recommendations to install additional ESC measures throughout the right of way due to the amount of open disturbed area.

On 8/9/2024, the Environmental Auditor conducted an evaluation at S-IJ16b east of MVP-GI-244 where EI observed and environmental resource impact on that day. The Environmental Auditor observed the contractor staff conducting minor sediment removal and mobilizing ESC measures to be installed. It appeared that a portion of the streambank eroded and sloughed due to concentrated flow from the upslope permanent waterbar end treatments. Recommendations were provided to MVP Environmental staff and engineer to consider enhancing the SSB at this location.

On 8/9/2024, the Environmental Auditor conducted an evaluation west of Cascade Drive where the EI observed an off right of way impact on 7/22/2024. Based on the evaluation, it appeared that heavy runoff from the 7/21/2024 storm event caused severe erosion throughout the slope. Temporary/enhanced ESC measures appeared to be installed and functional, sediment removed, and the areas stabilized. A recommendation was provided to consider enhancing the SSB at this location.

On 8/28/2024, the Environmental Auditor conducted an evaluation west of Mt. Tabor Road where the EIs observed environmental resource impacts at S-MN21 on 7/6/2024, 7/21/2024, and 7/23/2024. At the time of the evaluation, the Environmental Auditor observed the sediment removed and the ESC/SWM measures installed. The Environmental Auditor provided recommendations to further evaluate the slope west of the stream to ensure proper ESC measures installation and upgrading the current SSB.

On 9/3/2024, the EI conducted evaluations east of Highway 42, east of Seven Oaks Road/MVP-GI-253.02, and west of Old Furnace Road/MVP-GI-256.02 where off right of way impacts and environmental resource impacts to S-MM18, S-NN12, and S-NN11 were observed by the EIs on 9/1/2024. At S-MM18, it appeared runoff from the permanent waterbar end treatments on the slope east of the stream contributed to the impacts. Erosion was also observed along the inside edge of the perimeter sediment controls due to concentrated flow. It should be noted that the Environmental Auditor did not observe final stabilization conducted on the slope at the time of the evaluation. On the slope west of the stream, erosion was evident below the permanent waterbar end treatments. A recommendation was provided to install SSB on the east and west slopes due to concentrated flow conditions resulting in erosion. On 9/23/2024, the Environmental Auditor conducted a follow up evaluation and observed the sediment removed from the stream and upland locations, ESC measures repaired/replaced, and most areas stabilized. Soil stabilization blanket (SSB) was being installed on the streambanks and approximately 50 feet above each side of the stream. Hydraulic mulch was reapplied on the east and west slopes.

At S-NN12, the Environmental Auditor observed severe erosion on the slope east of the stream from what appeared to be topographic conditions causing concentrated flow and below the permanent waterbar end treatments and along the inside edge of the perimeter sediment controls on the slope west of the stream. At the time of the evaluation, ESC and SWM measures were not repaired due to unsafe conditions. At S-NN11, the Environmental Auditor observed the contractor staff conducting repair/maintenance activities, sediment removed, and nearby impacted areas stabilized. Based on the evaluation, it appeared that runoff from the permanent waterbar end treatments contributed to the erosion. On 9/13/2024, the Environmental Auditor conducted a follow up evaluation and observed the ESC/SWM measures repaired/enhanced, sediment removed, and the areas stabilized.

On 9/4/2024, the Environmental Auditor accompanied by the EI conducted an evaluation east of Gravelly Hill Road where off right of way impacts and two environmental resource impacts at S-P6 were observed by the EI on 8/30/2024 and 9/1/2024. The Environmental Auditor observed the contract staff conducting repair/maintenance activities throughout the right of way, sediment removed from S-P6, and areas stabilized. Recommendations were provided to enhance ESC measures throughout the right of way and above S-P6 to minimize potential future erosion and sediment impacts. The EI also conducted an evaluation east of MVP-GI-238.01 where the EI observed off right of way impacts on 9/1/2024. The Environmental Auditor observed the off right of way sediment removed and the areas stabilized. Recommendations were provided to ensure hydraulic mulch is properly applied per the ESC Plan

requirements and install SSB along the edge of the perimeter sediment controls on the slope to meet the ESC Plan and AS&S requirements.

On 9/23/2024, the Environmental Auditor conducted evaluations east of MVP-GI-266 and east of Kow Camp Road #1 where off right of way impacts and an environmental resource impact were observed by the EIs on 9/20/2024. At MVP-GI-266, the Environmental Auditor observed the contractor conducting ESC measures repairs/enhancements, the off right of way sediment removed, and the areas stabilized. Based on a communication with the LEI, no sediment removal is to occur from the Karst feature. Based on the evaluation, the Environmental Auditor observed no permanent waterbars and end treatments installed on the slope per the SWM plans. Based on communication with the LEI and MVP Environmental staff, these structure have been removed per the landowner's request. The Environmental Auditor recommended installing SSB in areas where straw mulch become displaced resulting in erosion. At Kow Camp Road #1, the Environmental Auditor observed the sediment removed from S-A32 and the areas stabilized. The Environmental Auditor recommended installing SSB east of Kow Camp Road where straw mulch was applied in areas where erosion occurred resulting in the impact to S-A32.

On 9/25/2024, the Environmental Auditor conducted evaluations at S-A32 east and west of Kow Camp Road #1, S-G32 east of Buffalo Anklets Road/MVP-GI-241.04, and S-Q14 below MVP-GI-234 (access road) following a high intensity/short duration storm event on late 9/24/2024. At Kow Camp Road #1, the Environmental Auditor observed sediment deposition in the S-A32 and significant erosion on the slope to the west. It appeared that runoff from the permanent waterbar end treatments contributed to the erosion. The Environmental Auditor also observed erosion under areas of the SSB east of Kow Camp Road #1 which appeared to result in impacts to S-A32. The Environmental Auditor provided a recommendation to install enhanced/upgraded SSB and additional sediment controls. At MVP-GI-241.04, the Environmental Auditor did not observe any impacts to S-G32 at the time of the evaluation; however, ESC and SWM measures were overwhelmed on the slope east of the stream. It appeared that runoff from the permanent waterbars and end treatments contributed to the erosion. The Environmental Auditor evaluated the right of way west of that access road where the EI observed off right of way impacts within upland areas and observed minimal to no vegetative growth throughout areas of the right of way. At MVP-GI-234, the Environmental Auditor evaluated visual locations within S-Q14 from the right of way where an environmental resource impact was observed by the EI that day. The Environmental Auditor observed the contractor staff conducting access road repairs and installing temporary ESC measures within the right of way limits above S-Q14 at the time of the evaluation. The Environmental Auditor communicated with the MVP Environmental staff and recommended an engineer review be conducted to develop redlines to implement enhanced ESC/SWM measures throughout the access road.

The Spread G Environmental inspection staff, Chief EI, and Environmental Auditor continue to monitor locations throughout the right of way and communicate/coordinate to repair/maintain and implement additional (enhanced) ESC/SWM measures as necessary. The Environmental Auditor continues to communicate with the LEI, EC, Chief EI, onsite EIs, and MVP Environmental staff on a regular basis. Discussions entail project feedback, technical support, and recommendations/guidance to maintain compliance with the ESC/SWM plans, SWPPP VSIRs, ODCP Inspection reports, and the AS&S.

The following Table G-1D provides a summary of the monthly total number of site evaluations conducted by the Environmental Auditor throughout the Q3 reporting period:

**Table G-1D**

Environmental Auditor Field Observations: July 1, 2024 - September 30, 2024	
Month	Total Observations
July 2024	19
August 2024	13
September 2024	26

## **VII. Conclusion(s)**

Per Section IV. (b) (1) of the Consent Decree, the Environmental Auditor conducted site evaluations, evaluated daily MVP Punchlists, ODCP Inspection reports, SWPPP VSIRs, communicated with the Spread G Environmental inspection staff, contractor Environmental staff, Chief EI, and the MVP Environmental staff and has concluded the following for the Spread G 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 following issues occurred:
  - Failure to maintain ESC measures during the removal of a temporary bridge crossing resulting in an environmental resource impact on 7/5/2024 following a storm event;
  - An off right of way impact occurred 7/12/2024 while the contractor was filling in an end sump with no perimeter controls;
  - Six off right of way impacts occurred on 7/18/2024 due to improperly installed waterbars;
  - Soil binders hydraulically applied within 100 feet of stream crossings at S-MM18 west of MVP-GI-253.02 and S-NN12 west of MVP-GI-256.02 on 9/13/2024; and
- All ineffective temporary ESC 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 contractor Environmental staff) 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 continues to recommend continued monitoring and communication between the Spread G Environmental inspection staff and the contractor Environmental staff to ensure ESC measures are properly installed/functional and enhanced where necessary to maintain compliance with the approved ESC Plans and Annual Standards and Specifications.

As the VADEQ is aware, there are several previous instances noted in the Q4 2019 through Q2 2024 Reports in which sediment has left the ROW but MVP's requests for landowner permission to take corrective measures have been denied. Therefore, 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.

MOUNTAIN VALLEY PIPELINE  
SPREAD G  
ENVIRONMENTAL AUDITOR PARTIAL BI-WEEKLY REPORT - 6/30/2024 through 7/7/2024 (BEGINNING OF Q3 2024 REPORTING PERIOD)

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 7/7/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>13</b> conducted from 7/1/2024 through 7/7/2024 (includes LY-026): <b>Holiday on 7/4/2024</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/1/2024 through 7/7/2024 (includes Carry Over Items from 6/30/2024): <b>143</b>											
Total Number of ODCP Inspections at Laydown Yard 026: <b>6</b> (7/1/2024 through 7/3/2024 and 7/5/2024 through 7/7/2024): <b>Holiday on 7/4/2024</b>											
Total Number of VA DEQ Observations from 7/1/2024 through 7/7/2024: <b>0</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>1</b> (A landowner complaint was observed on 7/5/2024 and filed with the VADEQ on 7/7/2024 (Pollution Investigation Report_IR #314589). The complainant alleged "sediment from steep slopes" impacted S-EF65 as a result of a "very serious thunderstorm" on 7/5/2024". On 7/6/2024, the EIs observed two off right of way sediment impacts at separate locations within S-EF65 (upstream of right of way and downstream of right of way) west of Mt. Tabor Road. On 7/5/2024, a strong thunderstorm event with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed resulting in the environmental resource impacts. The VADEQ was immediately notified, landowner approval granted, and sediment removed at the upstream location within the required timeframe. Due to the extent of sediment (approximately 1,000 feet) at the downstream location, an extension request was approved by the VADEQ. Per the VADEQ website, formal Closure remains pending). The Environmental Auditor will evaluate both locations the week of 7/8/2024.											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damage to ESC measures caused by fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>19</b> (1. On 7/1/2024, the EI identified an off right of way gravel impact within an upland area at the MVP-GI-249 access road. On 6/29/2024, a storm event with high intensity/short duration rainfall produced approximately 0.9 inches of rainfall in 1.5 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, gravel removed, and the impacted area stabilized. No environmental resources were impacted. 2. On 7/1/2024, the EI identified an off right of way sediment impact east of Kow Camp Road #1 as a result of the storm event on 6/29/2024. The storm event produced approximately 1.1 inches of rainfall in 1.5 hours causing ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC and SWM measures repaired/maintained, sediment removed, and the area stabilized. No environmental resources were impacted. <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b> 3-19. On 7/6/2024, the EIs observed 17 off right of way sediment impacts within upland areas in Giles and Montgomery Counties (included the JNF). On 7/5/2024, storm events with high intensity/short duration rainfall produced approximately 1.1-1.85 inches in 0.5 hours causing ESC and SWM measures to become overwhelmed. The VADEQ/USFS were immediately notified, landowner access granted, ESC and SWM measures repaired/maintained, sediment removed, and the areas stabilized at two locations. Due to wet/saturated conditions throughout the right of way, extension requests were approved by the VADEQ for the remaining off 15 right of way impact locations; however, ESC measures were repaired/maintained in the interim. It should be noted that two of the off right of way impacts subsequently resulted in environmental resource impacts at S-A32, S-EF65, and public road impacts at Kow Camp Road #1 and Mt. Tabor Road). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>*6</b> (On 7/6/2024, the EIs identified <b>6</b> environmental resource impacts at S-A32 west of Kow Camp Road #1, S-HH18 east of Craig Creek Road, S-MN21 west of Mount Tabor Road, S-U52 west of Mount Tabor Road, and S-EF65 west of Mount Tabor Road. *It should be noted an additional impact at a different location occurred at S-EF65; however, this location was not reported in the daily MVP Punchlist. On 7/5/2024, strong thunderstorms with high intensity/short duration rainfall produced approximately 1.1-1.85 inches of rainfall in 0.5 hours causing ESC and SWM measures to become overwhelmed. The VADEQ/USFS were immediately notified, ESC and SWM measures repaired/maintained, sediment removed, and impacted areas stabilized at 5 of the streams. One of the locations at S-EF65 (not provided in the daily MVP Punchlist) was immediately reported to the VADEQ and received an extension request approval due to wet conditions and the extent of the impacted area. A Courtesy Notice of Force Majeure Declaration will be submitted to the VADEQ by the MVP Environmental staff due to the magnitude of the storm event. On 7/6/2024, an Agency Compliance Form (Noncompliance Report #958) was submitted by the EI due to the contractor not installing ESC measures within a disturbed portion of the travel lane above S-U52 prior to the storm events). <b>Refer to Environmental Inspector Observations, Environmental Auditor Field Observations and Recommendations, and Required Findings and Conclusions for further discussion.</b>											
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: <b>0</b>											
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 7/1/2024 through 7/7/2024.											
CARRY OVER ITEMS FROM 6/30/2024											
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
11/12/2023		1		1			1	1 on 11/12/2023 Extended indefinitely until landowner permission has been granted			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
11/22/2023	0.9"-2.0" - 14 Hours *Rainfall occurred on 11/21/2023	2		2			2	2 on 11/22/2023 Extended indefinitely until landowner permission has been granted			Two items have been extended indefinitely via VADEQ approval until landowner permission is granted.
4/12/2024	0.6"-2.7" - 6 Hours *Storm event with intervals of high intensity/short duration rainfall occurred late 4/11/2024	3		3			3	3 on 4/12/2024 Extended indefinitely until landowner permission has been granted			Three items identified by the EIs as off right of way impacts within upland locations have been extended indefinitely via VADEQ approval until landowner permission is 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
7/1/2024	0.0"-1.1" - 1.5 Hours *Scattered storms with intervals of high intensity/short duration rainfall occurred on 6/29/2024	5		2			5 (Includes off right of way impacts)		5 on 7/2/2024		Five items were identified requiring ESC repair/maintenance and completed within the required timeframe. Two of the identified items were off right of way impacts up to 15 feet within upland areas at the MVP-GI-249 access road and east of Kow Camp Road #1, respectively. On 6/29/2024, storm events caused ESC measures to become overwhelmed resulting in off right of way gravel/sediment impacts. At MVP-GI-249, the VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, gravel removed, and the impact area stabilized. At the area east of Kow Camp Road #1, the VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, the areas stabilized, and the ESC measures repaired/enhanced within the required timeframe. No environmental resources were impacted. The EIs submitted Agency Compliance Forms (Problem Area Reports # 951 and # 952) on 7/1/2024. On 7/3/2024, the Environmental Auditor conducted evaluations at both locations. Refer to Environmental Auditor Field Observations and Recommendations for further discussion.
7/2/2024		2					2		1 on 7/3/2024	1 on 7/3/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
7/5/2024	0.0"-0.4" - 1 Hour *Isolated strong storms occurred on late 7/4/2024	6					6		5 on 7/6/2024	1 on 7/6/2024	Six items were identified requiring ESC repair/maintenance and completed within the required timeframe.
7/6/2024	0.8"-1.85" - .5 Hours *Thunderstorms with high intensity/short duration rainfall occurred late on 7/5/2024	122	*6 (*1 additional impact at S-EF65 not reported in the daily MVP Punchlist)	17			122 (includes off right of way and environmental resource impacts)	17 on 7/7/2024 (24 Hours) to be completed on 7/10/2024 due to wet conditions	72 on 7/7/2024 (includes five environmental resource impacts and two right of way impacts)	26 on 7/7/2024	<p>One hundred twenty-two items were identified requiring ESC, SWM, and Pollution Prevention repair/maintenance and 98 were completed within the required timeframe. Seventeen of the following items were identified as off right of way impacts within upland areas in Giles and Montgomery Counties:</p> <p><b>Giles County:</b> Three items were identified as off right of way impacts ranging approximately up to 75 feet within upland areas. It should be noted that one of the off right of way impacts subsequently resulted in an impact to Kow Camp Road #1 and an environmental resource impact at S-A32 below the road.</p> <p><b>Montgomery County:</b> Fourteen items were identified as off right of way impacts ranging approximately up to 500 feet within upland areas. It should be noted that one of the off right of way impacts which traveled approximately 500 feet off right of way subsequently impacted S-EF65 west of Mt. Tabor Road. One off right of way impact subsequently resulted in an impact to Mt. Tabor Road.</p> <p>On 7/5/2024, strong thunderstorms with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ/USFS were immediately notified, landowner access granted, sediment removed, and the ESC and SWM measures repaired/enhanced at two locations. Extension requests for the remaining 15 locations have been approved by the VADEQ due to saturated conditions. The LEI and EIs submitted Agency Compliance Forms (Problem Area Reports #957, #961, #963, #964, and #965 on 7/6/2024 and Problem Area Report #970) on 7/7/2024. The Environmental Auditor will initiate site evaluations the week of 7/8/2024.</p> <p>*Six items were identified as environmental resource impacts within the daily MVP Punchlist at S-A32 west of Kow Camp Road #1, S-HH18 (JNF) east of Craig Creek Road, S-MN21 west of Mount Tabor Road, S-IJ52 west of Mount Tabor Road, and S-EF65 west of Mount Tabor Road. *It should be noted that an additional impact at S-EF65 was not listed in the daily MVP Punchlist but was reported to the VADEQ. On 7/5/2024, strong thunderstorms with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ/USFS were immediately notified, sediment removed, and the ESC measures repaired/enhanced at five locations. An extension request for the remaining location at S-EF65 not provided in the daily MVP Punchlist has been approved by the VADEQ due to approximately 1,000 feet of stream impacts. The Environmental Auditor will initiate site evaluations the week of 7/8/2024. On 7/6/2024, the LEI and EIs submitted Agency Compliance Forms (Problem Area Reports #959, #960, #962, and #968). A Courtesy Notice of Force Majeure Declaration is being developed by the MVP Environmental staff. On 7/6/2024, the EI submitted an Agency Compliance Form (Noncompliance Report #958) due to the contractor not installing ESC measures on a portion of the travel lane above S-IJ52. Refer to Environmental Auditor Field Observations and Recommendations and Required Findings and Conclusions for further discussion.</p> <p><b>In additional to 17 items receiving extension request approvals, 7 items have three days to be completed within the required timeframe.</b></p>
7/7/2024		2					2				Two items were identified requiring ESC repair/maintenance and have three days to be 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
LANDOWNER/THIRD PARTY REPORTED COMPLAINTS											
DATE OF OBSERVATION	NEAREST ROAD OR FEATURE						TOTAL NUMBER OBSERVATIONS			SUMMARY OF OBSERVATIONS	
7/5/2024	Mt. Tabor Road						1			A landowner complaint was observed on 7/5/2024 and filed with the VADEQ on 7/7/2024 (Pollution Investigation Report_IR #314589). The complainant alleged "sediment from steep slopes" impacted S-EF65 as a result of a "very serious thunderstorm" on 7/5/2024". On 7/6/2024, the EIs observed two off right of way sediment impacts at separate locations within S-EF65 (upstream of right of way and downstream of right of way) west of Mt. Tabor Road. On 7/5/2024, a strong thunderstorm event with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed resulting in the environmental resource impacts. The VADEQ was immediately notified, landowner approval granted, and sediment removed at the upstream location within the required timeframe. Due to the extent of sediment (approximately 1,000 feet) at the downstream location, an extension request was approved by the VADEQ. Per the VADEQ website, formal Closure remains pending. The Environmental Auditor will evaluate both locations the week of 7/8/2024.	

ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS		
DATE OF OBSERVATION	OBSERVATIONS	CONCLUSION AND RECOMMENDATIONS
7/3/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-GI-241.03 (CIS)/Access Road; MVP-GI-241.02 (CIS/GAS), Kow Camp Road #1 (CIS/GAS), Doe Creek Road (CIS), MVP-GI-249 (GAS)/Access Road, and MVP-GI-249.03 (CIS/GAS).	The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding recommendations related to installing j-hooks along CFS on a slope and final grading concerns at natural drainage feature location. The Environmental Auditor evaluated the locations where the EIs identified two off right of way impacts within upland areas at MVP-GI-249 (access road) and east of Kow Camp Road #1 on 7/1/2024. Scattered storms occurred late on 6/29/2024 causing ESC measures to become overwhelmed. At the time of the evaluation it appeared that the ESC measures were repaired/maintained, sediment removed, and the impacted areas stabilized. The Environmental Auditor provided additional recommendations related to proper sediment control installation per ESC Plan height requirements.
7/1/2024 through 7/7/2024	<p>The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread G Project.</p> <p>The Environmental Auditor communicated with the LEI and EC regarding observations related to SWPPP VISR and ODCP inspection report documentation.</p> <p>On 7/5/2024, the EI observed the contractor removing the temporary bridge crossing at S-IJ52 west of Mt. Tabor Road and conducting grading activities within the travel lane above the stream. However, the ESC measures were not installed within a disturbed portion of the travel lane directly above the stream. A strong thunderstorm occurred within this area resulting in an environmental resource impact. The VADEQ was immediately notified and the sediment removed from the stream within the required timeframe. The EI submitted an Agency Compliance Form (Noncompliance Report #958) on 7/6/2024.</p> <p>The Environmental Auditor communicated with all Spread LEIs on 7/2/2024 regarding the Partial Bi-Weekly reporting period ending on 7/7/2024. The EI communicated with the Spread G LEI on 7/7/2024 regarding the off right of way and environmental resource impacts observed on 7/6/2024.</p>	The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements. The Environmental Auditor recommends continued BMP monitoring throughout the Spread G Project. Based on the SWPPP, MVP Punchlist findings, and communication with the Lead Environmental Inspector, the Spread G Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Stormwater Management Act.
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	On 7/5/2024, the EI observed the contractor removing the temporary bridge crossing at S-IJ52 west of Mt. Tabor Road and conducting grading activities within the travel lane above the stream. However, ESC measures were not installed within a disturbed portion of the travel lane directly above the stream. A strong thunderstorm occurred within this area resulting in an environmental resource impact. The VADEQ was immediately notified and the sediment removed from the stream within the required timeframe. The EI submitted an Agency Compliance Form (Noncompliance Report #958) on 7/6/2024.
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	

MOUNTAIN VALLEY PIPELINE  
SPREAD G  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 7/8/2024 through 7/21/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 7/21/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>33</b> conducted from 7/8/2024 through 7/21/2024 (includes LY-026)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/8/2024 through 7/21/2024 (Includes Carry Over Items from 7/7/2024): <b>97</b>											
Total Number of ODCP Inspections at Laydown Yard 026: <b>6</b> (7/8/2024 through 7/13/2024); <b>6</b> (7/152024 through 7/20/2024)											
Total Number of VA DEQ Observations from 7/8/2024 through 7/21/2024: <b>1</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Per the Closure section of the VADEQ Pollution Investigation Report #314147 dated 7/11/2024 based on a third party complaint received by the VADEQ on 5/30/2024, the VADEQ concluded appropriate compliance actions completed and verified by DEQ. Per the Closure section of the VADEQ Pollution Investigation Report #314589 dated 7/11/2024 based on a third party complaint observed on 7/5/2024, the VADEQ concluded appropriate compliance actions completed and verified by DEQ.											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damage to ESC measures caused by fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>10</b> (1. On 7/8/2024, the Environmental Auditor observed an off right of way sediment impact within an upland area west of Mt. Tabor Road. On 7/5/2024, strong storm events with intervals of high intensity/short duration rainfall produced approximately 1.75 inches of rainfall in .5 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. 2. On 7/12, the EI observed the contractor crew filling in a sump pit with no perimeter sediment controls installed causing an off right of way sediment impact within an upland area west of MVP-GI-234 within the JNF. The United States Forest Service (USFS) was immediately notified and the ESC measures replaced. Due to the minimal amount of sediment, removal was not warranted or practicable. The LEI submitted an Agency Compliance Form (Noncompliance Report #976) on 7/12/2024. 3-8. On 7/18/2024, the EI observed 6 off right of way sediment impacts throughout 800 feet of the right of way within upland areas west of Steele Acres Road. From 7/17/2024 into early 7/18/2024, strong storm events with high/intensity/short duration rainfall produced approximately 0.8 inches of rainfall within 1.5 hours causing improperly installed waterbars to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized. 9-10. On 7/21/2024, the EI observed two off right of way impacts within upland areas west of MVP-MLV-AR-26. On 7/20/2024, a strong thunderstorm event produced approximately 0.7 inches of rainfall in two hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified and these corrective action items have 24 hours to be completed within the required timeframe. No environmental resources were impacted). Refer to Environmental Inspector Observations, Environmental Auditor Field Observations and Recommendations, and Required Findings and Conclusions for further discussion.											
Total Number of Environmental Resource Impacts: <b>1</b> (On 7/21/2024, the EI observed an environmental resource impact at S-MN21 west of MVP-MLV-AR-26. On 7/20/2024, a storm event with intervals of high intensity short duration rainfall produced approximately 0.7 inches of rainfall within two hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified and the corrective action items have 24 Hours to be completed within the required timeframe. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration). Refer to Environmental Inspector Observations 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: <b>0</b>											
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 7/8/2024 through 7/21/2024.											
CARRY OVER ITEMS FROM 7/7/2024											
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
11/12/2023		1		1			1	1 on 11/12/2023 Extended indefinitely until landowner permission has been granted			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
11/22/2023	0.9"-2.0" - 14 Hours *Rainfall occurred on 11/21/2023	2		2			2	2 on 11/22/2023 Extended indefinitely until landowner permission has been granted			Two items have been extended indefinitely via VADEQ approval until landowner permission is granted.
4/12/2024	0.6"-2.7" - 6 Hours *Storm event with intervals of high intensity/short duration rainfall occurred late 4/11/2024	3		3			3	3 on 4/12/2024 Extended indefinitely until landowner permission has been granted			Three items identified by the EIs as off right of way impacts within upland locations have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/6/2024	0.8"-1.85" - .5 Hours *Thunderstorms with high intensity/short duration rainfall occurred late on 7/5/2024	24	1	15			24 (includes off right of way and environmental resource impacts)	17 on 7/7/2024 to be completed on 7/10/2024 due to wet conditions (ESC/SWM repairs and off right of way impacts) 2 of the above the above items received additional extensions for 7/12/2024 and 7/13/2024, respectively	2 on 7/8/2024 11 on 7/9/2024 4 on 7/10/2024	2 on 7/8/2024 4 on 7/9/2024 1 on 7/12/2024	Twenty-four items requiring ESC and SWM repair maintenance were identified on 7/6/2024 and completed within the required timeframe. Seventeen of those items received extension request approvals from the VADEQ. Fifteen off right of way sediment impacts within upland areas and one environmental resource impact to S-EF65 were identified by the EIs on 7/6/2024. On late 7/5/2024, strong thunderstorms with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. Extension requests have been approved by the VADEQ due to saturated conditions and the extent of cleanup required at S-EF65. On 7/15/2024, the MVP Environmental staff submitted a Final Notice of Force Majeure Declaration for S-A32, S-MN21, S-HH18, and S-EF65. Two 24 hour items requiring ESC and SWM repair/maintenance were completed within the required timeframe via extension request approvals.

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
7/8/2024		1		1			1 (off right of way impact)	1 on 7/9/2024 to be completed on 7/12/2024 due to wet conditions	1 on 7/10/2024		One item was identified requiring ESC repair/maintenance and addressing an off right of way sediment impact approximately 30 feet within an upland area west of Mt. Tabor Road. During a site evaluation, the Environmental Auditor observed what appeared to be an off right of way sediment impact within an upland area west of Mt. Tabor Road. A heavy thunderstorm event on 7/5/2024 caused ESC measures to become overwhelmed. The Environmental Auditor communicated this observation with the onsite EI. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. No environmental resources were impacted.
7/9/2024	0.0"-0.7" - .66 Hours *Isolated storm events with intervals of high intensity/short duration rainfall occurred on 7/8/2024	3					3			3 on 7/10/2024	Three items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/10/2024		4					4		2 on 7/10/2024	2 on 7/10/2024	Four items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/11/2024		7					7		5 on 7/12/2024	2 on 7/12/2024	Seven items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/16/2024		8					8		8 on 7/17/2024		Eight items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/17/2024	0.05"-0.35" - .5 Hours *Scattered strong storm events with intervals of high intensity/short duration rainfall occurred on 7/16/2024	4					4		4 on 7/18/2024		Four items were identified requiring ESC repair/maintenance and completed within the required timeframe.
7/18/2024	0.45"-1.2" - 1.5 Hours *Scattered strong storm events with areas receiving high intensity/short duration rainfall occurred on late 7/17/2024 and 7/18/2024	20		6			20 (includes off right of way impacts)	1 on 7/19/2024 to be completed on 7/22/2024 due to wet conditions	13 on 7/18/2024 6 on 7/19/2024 (includes off right of way impacts)		Twenty items were identified requiring ESC repair/maintenance and 19 were completed within the required timeframe. Six of the items were identified as off right of way sediment impacts ranging approximately 10 feet to 75 feet within upland locations west of Steele Acres Road. From 7/17/2024 into early 7/18/2024, storm events with intervals of high intensity/short duration rainfall caused improperly installed ESC measures (temporary waterbars) to fail resulting in the off right of way impacts. The VADEQ was immediately notified, landowner access granted, ESC measures properly reinstalled/repared, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. An Agency Compliance Form (Noncompliance Report #977) was submitted by the LEI on 7/18/2024. <b>One of the identified items received an extension request approval.</b>
7/19/2024		3					3		3 on 7/20/2024		Three items were identified by the Environmental Auditor requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/21/2024	0.2"-1.0" - 2 Hours *Storm events with areas receiving high intensity/short duration rainfall occurred on 7/20/2024	17	1	2			17 (includes environmental resource and off right of way impacts)				Seventeen items were identified requiring ESC repair/maintenance. One of the items was identified as an environmental resource impact at S-MN21 and two of the items were off right of way sediment impacts approximately 20 feet within upland areas west of MVP-MLV-AR-26. On 7/20/2024, a storm event with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified. These items have 24 hours to be completed within the required timeframe. Agency Compliance Forms (Problem Area Reports #983 and #985) were submitted by the LEI on 7/21/2024. It should be noted that no environmental resources were impacted from the off right of way impacts within the upland areas. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. <b>A total of 17 items have 24 hours (12) and three days (2) to be completed within the required timeframes.</b>
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
7/17/2024	0.05"-0.35" - .5 Hours Scattered strong storm events with intervals of high intensity/short duration rainfall occurred on 7/16/2024	1					1			1 on 7/18/2024	One item was identified requiring ESC 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
7/8/2024	The Environmental Auditor conducted site evaluations at MVP-MLV-AR-26 (CIS/GAS) and MVP-MN-258.04 (GAS).	<p>The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to off right of way impacts observed west of Mt. Tabor Road, installing a higher grade soil stabilization blanket (SSB) on steep slopes, and not applying hydraulic mulch within 24 hours of a forecasted rain event.</p> <p>The Environmental Auditor conducted evaluations west of Mt. Tabor Road where environmental resource impacts to S-EF65 and S-IJ52 occurred on 7/5/2024 as a result of a strong thunderstorm event. The off right of way sediment (including Mt. Tabor Road) in upland areas, S-IJ52, and one upstream location at S-EF65 was removed, ESC measures repaired/enhanced, and the locations stabilized. The contractor staff was observed removing sediment from the second location at S-EF65 at the time of the evaluation. The Environmental Auditor conducted evaluations east of Craig Creek Road/MVP-MN-258.04 where off right of way sediment impacts and environmental resource impact at S-HH18 occurred on 7/5/2024 as a result of a strong thunderstorm event. The Environmental Auditor observed the sediment removed from S-HH18 and the contractor was initiating off right of way sediment removal at the upland locations. The ESC/SWM measures appeared to be repaired at the time of the evaluation.</p>
7/18/2024	The Environmental Auditor conducted site evaluations at the following locations: Norcross Road (CIS), MVP-GI-238.01 (CIS/GAS), MVP-LY-29, MVP-MLV-AR-24 (CIS/GAS), MVP-GI-240 (CIS), Big Branch Hollow Road (CIS/GAS), and Kow Camp Road #1 (CIS/GAS).	<p>The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to a potential diesel spill, installing SSB and cross culvert inlet protection within an access road ditch, Pollution Prevention concerns related to trash on the right of way, and installing appropriate ESC measures above a temporary bridge crossing as the current measures are ineffective per Section 3.2 of the Annual Standards and Specifications (AS&amp;S).</p> <p>The Environmental Auditor conducted evaluations east and west of Kow Camp Road #1 where an environmental resource impacts to S-A32 and off right of way impacts within an upland area resulting in impacts to Kow Camp Road and S-A32 occurred on 7/5/2024 as a result of a strong thunderstorm event. The Environmental Auditor observed the off right of way sediment in the upland areas (including Kow Camp Road) and S-A32 removed, ESC measures repaired/replaced, and the areas stabilized.</p>
7/8/2024 through 7/21/2024	<p>The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread G Project.</p> <p>The Environmental Auditor communicated with the LEI and EC regarding observations related to SWPPP VISR and ODCP Inspection report documentation.</p> <p>On 7/12/2024, the EI observed the contractor crew filling in a sump pit with no perimeter sediment controls installed causing an off right of way sediment impact within an upland area west of MVP-GI-234 within the JNF. The United States Forest Service (USFS) was immediately notified and the ESC measures replaced. Due to the minimal amount of sediment, removal was not warranted or practicable. The LEI submitted an Agency Compliance Form (Noncompliance Report #976) on 7/12/2024. On 7/18/2024, the EI observed 6 off right of way impacts within upland areas west of Steele Acres Road. Upon further evaluation, the EI observed improperly installed waterbars causing sediment to overtop and undermine perimeter ESC measures subsequently resulting in the off right of way impacts. The LEI submitted an Agency Compliance Form (Noncompliance Report #977) on 7/18/2024.</p> <p>The Environmental Auditor communicated with all Spread LEIs on 7/17/2024 regarding the Bi-Weekly reporting period ending on 7/21/2024. The Environmental Auditor provided continued recommendations to install appropriate ESC measures when straw mulch is rendered ineffective per Section 3.2 of the Annual Standards and Specifications and conduct QA/QC on SWPPP VSIRs to ensure documentation is accurate and thorough.</p>	<p>The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements. The Environmental Auditor recommends continued BMP monitoring throughout the Spread G Project. Based on the SWPPP, MVP Punchlist findings, and communication with the Lead Environmental Inspector, the Spread G Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Stormwater Management Act. The Environmental Auditor recommends communicating with the contractor staff related to proper ESC measures installation.</p>
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	<p>1. On 7/12/2024, the EI observed the contractor crew filling in a sump pit with no perimeter sediment controls installed causing an off right of way sediment impact within an upland area west of MVP-GI-234 within the JNF. The United States Forest Service (USFS) was immediately notified and the ESC measures replaced. Due to the minimal amount of sediment, removal was not warranted or practicable. The LEI submitted an Agency Compliance Form (Noncompliance Report #976) on 7/12/2024.</p> <p>2. On 7/18/2024, the EI observed 6 off right of way impacts within upland areas west of Steele Acres Road. Upon further evaluation, the EI observed improperly installed waterbars causing sediment to overtop and undermine perimeter ESC measures subsequently resulting in the off right of way impacts. The LEI submitted an Agency Compliance Form (Noncompliance Report #977) on 7/18/2024.</p>
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: 8/4/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>41</b> conducted from 7/22/2024 through 8/4/2024 (includes LY-026)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/22/2024 through 8/4/2024 (Includes Carry Over Items from 7/21/2024): <b>214</b>											
Total Number of ODCP Inspections at Laydown Yard 026: <b>7</b> (7/22/2024 through 7/28/2024); <b>6</b> (7/29/2024 through 8/3/2024)											
Total Number of VA DEQ Observations from 7/22/2024 through 8/4/2024: <b>0</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damage to ESC measures caused by fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>8 (1</b> . On 7/22/2024, the EI observed an off right of way sediment impact within upland an area west of Cascade Drive. On 7/21/2024, a precipitation event coupled with existing saturated conditions produced approximately 0.5 inches of rainfall within 2 hours causing a slope to slough due to concentrated flow from permanent waterbar end treatments resulting in ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures temporarily repaired/enhanced, sediment removed, and the impacted area stabilized. No environmental resources were impacted. <b>2-6</b> . On 7/23/2024, the EIs observed 5 off right of way impacts within upland areas east of Steele Acres Road (4) and west of Collins Drive (1). On 7/22/2024 into early 7/23/2024, storm events with high intensity/short duration rainfall produced approximately 1.7 inches of rainfall in two hours. These storm events coupled with existing saturated conditions caused ESC measures to become overwhelmed due to concentrated runoff from the permanent waterbar end treatments. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. <b>7-8</b> . On 7/24/2024, the EIs observed two off right of way impacts within upland areas at the MVP-GI-249 access road and west of MVP-GI-256.02. On 7/23/2024, storm events with high intensity/short duration rainfall produced approximately 1.7 inches of rainfall in two hours. These storm events coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>3 (1-2</b> . On 7/23/2024, the EI observed an environmental resource impacts at S-IJ19/S-IJ18 at the MVP-GI-244 access road and S-MN21 west of Mt. Tabor Road. On 7/22/2024 and 7/23/2024, storm events with high intensity/short duration rainfall produced approximately 1.25-1.7 inches of rainfall in two to five hours. These storm events coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, ESC and SWM measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. It should be noted that concentrated runoff from the permanent waterbar end treatments contributed to the S-MN21 impact. <b>3</b> . On 7/24/2024, the EI observed an environmental resource impact at S-IJ16b east of MVP-GI-244. On 7/22/2024 and 7/23/2024, storm events with high intensity/short duration rainfall produced approximately 2.1 inches of rainfall in five hours. These storm events coupled with existing saturated conditions caused a slope to slough resulting in ESC measures to become overwhelmed subsequently impacting approximately 100 feet of the stream off right of way. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe). The MVP Environmental staff submitted a Final Notice of Force Majeure Declaration for S-IJ19/S-IJ18 and S-IJ16b on 8/2/2024. <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
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: <b>0</b>											
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 7/22/2024 through 8/4/2024.											
CARRY OVER ITEMS FROM 7/21/2024											
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
11/12/2023		1		1			1	1 on 11/12/2023 Extended indefinitely until landowner permission has been granted			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
11/22/2023	0.9"-2.0" - 14 Hours *Rainfall occurred on 11/21/2023	2		2			2	2 on 11/22/2023 Extended indefinitely until landowner permission has been granted			Two items have been extended indefinitely via VADEQ approval until landowner permission is granted.
4/12/2024	0.6"-2.7" - 6 Hours *Storm event with intervals of high intensity/short duration rainfall occurred late 4/11/2024	3		3			3	3 on 4/12/2024 Extended indefinitely until landowner permission has been granted			Three items identified by the EIs as off right of way impacts within upland locations have been extended indefinitely via VADEQ and the USFS until landowner permission is granted.
7/18/2024	0.45"-1.2" - 1.5 Hours *Scattered strong storm events with areas receiving high intensity/short duration rainfall occurred on late 7/17/2024 and 7/18/2024	1					1	1 on 7/19/2024 to be completed on 7/22/2024 due to wet conditions	1 on 7/22/2024		One item was identified requiring ESC repair/maintenance and completed within the required timeframe via an extension request approval.
7/21/2024	0.2"-1.0" - 2 Hours *Storm events with areas receiving high intensity/short duration rainfall occurred on 7/20/2024	17	1	2			17 (includes off right of way and environmental resource impacts		15 on 7/22/2024	2 on 7/22/2024	Seventeen items were identified requiring ESC repair/maintenance and completed within the required timeframe. One item was identified as an environmental resource impact at S-MN21 and two of the items were identified as off right of way sediment impacts approximately 20 feet within upland areas west of Mt. Tabor Road. On 7/20/2024, a storm event with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed resulting in the environmental resource and off right of way impacts. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. The LEI submitted Agency Compliance Forms (Problem Area Reports #983 and #985) on 7/21/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration and Final Notice of Force Majeure Declaration for S-MN21 on 7/23/2024 and 7/28/2024, respectively. It should be noted that no environmental resources were impacted from the off right of way impacts within the upland areas.

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
7/22/2024		24		1			24 (includes off right of way impact)		23 on 7/23/2024	1 on 7/23/2024	Twenty-four items were identified requiring ESC repair/maintenance and completed within the required timeframe. One item was identified as an off right of way sediment impact traveling approximately 200 linear feet up to 15 feet off right of way from the right of way within an upland area west of Cascade Drive. On 7/20/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures temporarily repaired/enhanced, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. It should be noted that runoff from the permanent waterbar end treatments contributed to the impact. The LEI submitted Agency Compliance Report (Problem Area Report #986) on 7/22/2024.
7/23/2024	0.2"-1.7" - 2 Hours *Storm events with areas of high intensity/short duration rainfall occurred on 7/22/2024	54	2	5			54 (includes off right of way and environmental resource impacts)	6 on 7/24/2024 to be completed on 7/27/2024 due to wet conditions	35 on 7/24/2024 6 on 7/25/2024	11 on 7/24/2024 1 on 7/25/2024 1 on 7/26/2024	<p>Fifty-four items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. Five of the items were off right of way sediment impacts west of Steele Acres Road/MVP-GI-258.01 (4) and Collins Road (1) up to 50 feet within upland areas. On 7/22/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. The LEI submitted an Agency Compliance Form (Problem Area Report #997) on 7/23/2024. No environmental resources were impacted.</p> <p>Two of the identified items were environmental resource impacts at the confluence of S-IJ19/S-IJ18 at MVP-GI-244 (access road) and S-MN21 west of Mt. Tabor Road. On 7/22/2024 and 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. At S-IJ19/S-IJ18, approximately 30 feet of the stream was impacted off right of way due to gravel washout on the access road. The VADEQ was immediately notified, landowner access granted, the ESC measures were repaired/enhanced, sediment removed, and the impacted areas stabilized. On 7/24/2024, the Environmental Auditor conducted a site evaluation and recommended installing soil stabilization blanket (SSB) where the erosion originated as the straw mulch is not an effective measure per Section 3.2 of the Annual Standards and Specifications. At S-MN21, it appeared that runoff from permanent waterbar end treatments contributed to the stream impact. The VADEQ was immediately notified, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. The LEI submitted Agency Compliance Reports (Problem Area Reports #998 and #999) on 7/23/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration and Final Notice of Force Majeure Declaration for S-IJ19/S-IJ18 on 7/28/2024 and 8/2/2024, respectively.</p>
7/24/2024	0.2"-0.55" - 3 Hours *Storm events occurred on 7/23/2024	65	1	2			65 (includes off right of way and environmental resource impacts)		32 on 7/25/2024	26 on 7/25/2024 5 on 7/26/2024 2 on 7/27/2024	<p>Sixty-five items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. Two items were identified as off right of way sediment/gravel impacts at MVP-GI-249 and west of MVP-GI-256.02 approximately up to 75 feet within upland areas. On 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframe. No environmental resources were impacted. It should be noted that routine maintenance occurred in the 7/22/2024 daily MVP Punchlist for MVP-GI-249. Upon verifying completion of the 24 Hour item on 7/23/2024 the EI suspected an off right of way impact and communicated with survey to verify. Therefore, the LEI included this impact in the Agency Compliance Report (Problem Area Report #997) on 7/23/2024. A separate Problem Area Report #1006 was submitted for the off right of way impact at MVP-GI-256.02 on 7/24/2024. No environmental resources were impacted.</p> <p>One item was identified as environmental resource impact at S-IJ16b east of MVP-GI-244. On 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed resulting in the streambank to slough, subsequently impacting approximately 100 feet of the stream off right of way. The VADEQ was immediately notified, landowner access granted, the ESC measures were repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. It should be noted that runoff from the permanent waterbar end treatments contributed to this impact. The LEI submitted an Agency Compliance Report (Problem Area Report #1008) on 7/24/2024. The MVP Environmental staff submitted a Final Notice of Force Majeure Declaration on 8/2/2024.</p>
7/25/2024		17					17		9 on 7/26/2024	5 on 7/26/2024 3 on 7/27/2024	Seventeen items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
7/26/2024	0.1"-0.5" - 1 Hour *Storm events occurred on 7/25/2024	6					6		1 on 7/27/2024	5 on 7/27/2024	Six items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/29/2024		14					14		4 on 7/30/2024	10 on 7/30/2024	Fourteen items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/30/2024	0.1"-0.2" - 2 Hours *Rainfall occurred on 7/29/2024	4					4		3 on 7/31/2024	1 on 7/31/2024	Four items were identified requiring ESC repair/maintenance and completed within the required timeframe.
7/31/2024	0.0"-0.25" - .66 Hours *Scattered showers occurred on 7/30/2024	3					3			3 on 8/1/2024	Three items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/2/2024		1					1			1 on 8/3/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
8/3/2024	0.2"-0.9" - 5 Hours *Rainfall occurred on 8/2/2024	2					2		2 on 8/3/2024		Two items were identified requiring ESC 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
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			
7/24/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-GI-244 (Access Road), MVP-GI-249 (Access Road), MVP- GI-249 (CIS/GAS), and Steele Acres Road/MVP-GI-258.01 (CIS).							The Environmental Auditor observed locations where the ESC/SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to straw mulch being an ineffective measures per Section 3.2 of the Annual Standards and Specifications in areas where it has become dislodged resulting in erosion, height concerns related to broad based dips on an access road, and communicating with the contractor to have the stabilization crew immediately follow the grading crew to minimize the amount of open disturbed right of way. The Environmental Auditor conducted evaluations at MVP-GI-244 where an environmental resource impact occurred at S-U19/S-U18 as a result of a storm event on 7/22/2024. At the time of the evaluation it appears that the sediment was removed, ESC measures repaired/enhanced, and the locations stabilized The Environmental Auditor recommended installing soil stabilization blanket in an upslope area where straw mulch became dislodged resulting in erosion and subsequently impacting the environmental resource. The Environmental Auditor conducted evaluations along the MVP-GI-249 access road and Steel Acres Road (CIs) where two off right of way impacts within upland areas occurred due to storm events on 7/22/2024. At MVP-GI-249 the Environmental Auditor observed repairs conducted and the off right of way gravel/sediment not removed at the time of the evaluation. The Environmental Auditor recommended properly installing broad based dips. At Steele Acres Road (CIs), the Environmental Auditor observed ESC measures repaired, off right of way sediment removed, and the impacted areas stabilized. The Environmental Auditor recommended installing enhanced ESC measures and conducting proper track walking to minimize accelerated erosion. The Environmental Auditor also observed a large disturbed area of the right of way where final grading and SWM structures installation has been completed prior to and during heavy rainfall events. The Environmental Auditor highly recommended the need for the contractor stabilization crew to immediately conduct stabilization activities where final grading and SWM measures installation have been completed to minimize erosion and resulting off right of way sediment impacts.			
7/22/2024 through 8/4/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread G Project.  The Environmental Auditor communicated with the LEI and EC regarding observations related to SWPPP VISR and Sediment Tracker documentation. The Environmental Auditor emphasized thoroughly documenting locations in a given SWPPP VSIR where off right of way and/or environmental resource impacts occurred in between SWPPP inspections.  The Environmental Auditor communicated with all Spread LEIs on 7/31/2024 regarding the Bi-Weekly reporting period ending on 8/4/2024. The Environmental Auditor provided continued to recommend to installing SSB when straw mulch is rendered ineffective per Section 3.2 of the Annual Standards and Specifications and ensure the SSB is properly installed per the ESC Plan requirements. It should be noted that the Environmental Auditor continues to observe improper SSB anchoring throughout the Spreads which resulted in exacerbated erosion under the blanket.							The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements. The Environmental Auditor recommends continued BMP monitoring throughout the Spread G Project. Based on the SWPPP, MVP Punchlist findings, and communication with the Lead Environmental Inspector, the Spread G Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Stormwater Management Act. The Environmental Auditor recommends communicating proper ESC measures installation with the contractor.			
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										

MOUNTAIN VALLEY PIPELINE  
SPREAD G  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 8/5/2024 through 8/18/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 8/18/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 41 conducted from 8/5/2024 through 8/18/2024 (includes LY-026)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 8/5/2024 through 8/18/2024 (Includes Carry Over Items from 8/4/2024): 68											
Total Number of ODCP Inspections at Laydown Yard 026: 7 (8/5/2024 through 8/11/2024); 6 (8/12/2024 through 8/17/2024)											
Total Number of VA DEQ Observations from 8/5/2024 through 8/18/2024: 0											
Total Number of Landowner/Third Party Reported Complaints: 2 (1. A third party complaint was observed and filed with the VADEQ on 8/6/2024 (Pollution Investigation Report_IR #315130). The complainant alleged "boulders and unstabilized soil in a fill area are threatening to impact a stream flowing into the New River "and "believers the site is being used by MVP ". Based on an Agency Compliance Form (Noncompliance Report #1018) submitted by the LEI on 8/8/2024, the contractor was using an unauthorized off site disposal site per an agreement with the landowner. The material was placed within an upland location; however, a stream was impacted via landowner grading over a fill slope. Per MVP, the contractor was informed that no further disposal was permitted at this location. The contractor subsequently stabilized the fill slope and installed ESC measures along the base of the slope. A corrective action plan to implement additional measures will be submitted by the MVP contractor. Per the VADEQ website, formal Closure remains pending. 2. A third party complaint was observed and filed with the VADEQ on 8/7/2024 (Pollution Investigation Report_IR #315007). The complainant alleged "MVP was disturbing ground" "with heavy rain expected in this area". On 8/7/2024, the contractor staff was conducting ESC measures maintenance/enhancements in preparation for the upcoming tropical storm). Per the Closure section of the IR on 8/12/2024, no compliance issues were observed.											
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 (damage to ESC measures caused by fallen debris): 0											
Total Number of Off Right of Way Impacts: 4 (1-4. On 8/9/2024, the EIs observed off right of way sediment impacts within uplands areas east of Stevers Gap Trail (3) and west of Hendrickson Road (1). On 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby produced approximately 2.25 inches of rainfall within 14 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized. No environmental resources were impacted). Refer to Environmental Inspector Observations for further discussion.											
Total Number of Environmental Resource Impacts: 1 (1. On 8/9/2024, the EI observed an environmental resource impacts at S-U16b east of MVP-GI-245.01. On 8/8/2024,a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby produced approximately 1.5 inches of rainfall within 14 hours. This events caused ESC and SWM measures to become overwhelmed/damaged resulting in the slope/streambank above S-U16b to slough subsequently impacting the stream. It should be noted that based on the Environmental Auditor's evaluation the same day, it appeared that runoff from the permanent waterbar end treatments contributed to this impact. The VADEQ was immediately notified, sediment removed, and temporary ESC measures installed. Due to the sloughing, an engineering review was conducted and final repairs completed within the required timeframe via an extension request approval. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 8/14/2024. Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations 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 8/5/2024 through 8/18/2024.											
CARRY OVER ITEMS FROM 8/4/2024											
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
11/12/2023		1		1			1	1 on 11/12/2023 Extended indefinitely until landowner permission has been granted			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
11/22/2023	0.9"-2.0" - 14 Hours *Rainfall occurred on 11/21/2023	2		2			2	2 on 11/22/2023 Extended indefinitely until landowner permission has been granted			Two items have been extended indefinitely via VADEQ approval until landowner permission is granted.
4/12/2024	0.6"-2.7" - 6 Hours *Storm event with intervals of high intensity/short duration rainfall occurred late 4/11/2024	3		3			3	3 on 4/12/2024 Extended indefinitely until landowner permission has been granted			Three items identified by the EIs as off right of way impacts within upland locations have been extended indefinitely via VADEQ and the USFS until landowner permission is 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
8/5/2024	0.0"-0.7" - 1 Hour *Isolated storms occurred on 8/3/2024	5					5		5 on 8/6/2024		Five items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
8/6/2024		2					2		2 on 8/7/2024		Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/9/2024	1.0"-2.5" - 14 Hours *Storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby occurred from 8/8/2024 into early 8/9/2024	37	1	4			37 (includes off right of way and environmental resource impacts)	1 on 8/9/2024 to be completed on 8/12/2024 (engineer review/redlines related to sloughing directly above S-U16b)	19 on 8/10/2024 1 on 8/16/2024 (extension request)	13 on 8/10/2024 4 on 8/11/2024	Thirty-seven items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Four items were identified as off right of way sediment impacts up to 40 feet within upland areas east of Stevers Gap Trail (3) and west of Hendrickson Road (1). On 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby caused ESC and SWM measures to become overwhelmed resulting in the streambank sloughing into the stream. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. The LEI submitted an Agency Compliance Form (Problem Area Report #1020) on 8/9/2024. No environmental resources were impacted.  One item was identified as an environmental resource impact at S-U16b west of MVP-GI-245.01. On 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby caused ESC and SWM measures to become overwhelmed resulting in the streambank sloughing into the stream. The VADEQ was immediately notified, ESC measures temporarily repaired/enhanced, and sediment removed from the stream channel. On 8/9/2024, the Environmental Auditor conducted a site evaluation and observed the contractor staff removing the minor sediment from the stream. It should be noted that runoff from the permanent waterbar end treatments contributed to the impact. Due to the sloughing, an extension request was approved by the VADEQ as an engineering review was underway. On 8/16/2024, the slope was regraded, SWM measures repaired/maintained, and permanent/enhanced ESC measures installed. The LEI submitted an Agency Compliance Form (Problem Area Report #1021) on 8/9/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 8/14/2024.
8/13/2024		15				1	14		10 on 8/14/2024	5 on 8/14/2024	Fifteen items were identified requiring ESC repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to livestock traffic.
8/15/2024		2					2		2 on 8/16/2024		Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/16/2024		1					1			1 on 8/17/2024	One item was identified requiring ESC 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
LANDOWNER/THIRD PARTY REPORTED COMPLAINTS											
DATE OF OBSERVATION	NEAREST ROAD OR FEATURE						TOTAL NUMBER OBSERVATIONS			SUMMARY OF OBSERVATIONS	
8/6/2024	163 Riverview Lane Eggleston, VA						1			A third party complaint was observed and filed with the VADEQ on 8/6/2024 (Pollution Investigation Report_IR #315130). The complainant alleged "boulders and unstabilized soil in a fill area are threatening to impact a stream flowing into the New River "and "believers the site is being used by MVP ". Based on an Agency Compliance Form (Noncompliance Report #1018) submitted by the LEI on 8/8/2024, the contractor was using an unauthorized off site disposal site per an agreement with the landowner. It should be noted that the contractor did not communicate the agreement with the landowner and the off right of way disposal location with the Spread G Environmental inspection staff. The material was placed within an upland location; however, a stream was impacted via landowner grading over a fill slope. Per MVP, the contractor was informed that no further disposal was permitted at this location. The contractor subsequently stabilized the fill slope and installed ESC measures along the base of the slope. A corrective action plan to implement additional measures will be submitted by the MVP contractor. Per the VADEQ website, the VADEQ informed the complainant the off right of way disposal site is not part of the MVP ESC/SWM plans and referred this complaint to the Giles County for local program review. Further coordination is underway between the VADEQ and Giles County to determine applicability of ESC/SWM regulations and responsibility for the disposal site. Formal Closure remains pending.	
8/7/2024	Blue Grass Trail (Highway 42)						1			A third party complaint was observed and filed with the VADEQ on 8/7/2024 (Pollution Investigation Report_IR #315007). The complainant alleged "MVP was disturbing ground" "with heavy rain expected in this area". On 8/7/2024, the contractor staff was conducting ESC measures maintenance/enhancements in preparation for the upcoming tropical storm (Debby). Per the Closure section of the IR on 8/12/2024, no compliance issues were observed.	
ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS											
DATE OF OBSERVATION	OBSERVATIONS							CONCLUSION AND RECOMMENDATIONS			
8/9/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-GI-249/Mountain Lake Road (CIS), MVP-GI-241.04 (CIS/GAS), MVP- LY- 026, Big Branch Hollow Road (CIS/GAS), Cascade Drive (CISO, MVP-GI-241.02 (CIS/GAS), and MVP-GI-245.01/MVP-MLV-AR-25 (CIS and Access Road).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to hydraulic mulch and SSB installation not meeting the ESC Plan requirements, stabilizing a disturbed access road ditch, and installing a higher grade SSB where the current SSB is note adequately functioning.  The Environmental Auditor conducted an evaluation east of MVP-GI-244 where an environmental resource impact was observed by the EI at S-IJ16b as a result of a storm event from Tropical Storm Debby on 8/8/2024. At the time of the evaluation, the contractor staff was in the process of removing the minimal soil deposited within the stream channel. Based on the evaluation, it appeared that the east slope above the stream sloughed caused by concentrated runoff from the permanent waterbar end treatments. The environmental auditor also observed the permanent waterbar above the stream was damaged due to the excess runoff. Temporary ESC measures and permanent waterbar repair are slated to be addressed. A Geotech will be conducting a site investigation on 8/10/2024 to to review the area where sloughing occurred on the streambank.			
8/5/2024 through 8/18/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread G Project.  The Environmental Auditor communicated with the LEI and Environmental Coordinator EC regarding observations related to SWPPP VISR documentation.  On 8/6/2024, the MVP contractor was using an unauthorized off site rock/soil disposal site per an agreement with the landowner. The material was placed by the contractor within an upland location; however, a stream was impacted via landowner grading over a fill slope. Per MVP, the contractor was informed that no further disposal was permitted at this location. The contractor subsequently stabilized the fill slope and installed ESC measures along the base of the slope. A corrective action plan to implement additional measures will be submitted by the MVP contractor. It should be noted that the Spread G Environmental inspection staff was not informed about this agreement and disposal location prior to third party complaints to the FERC and VADEQ. The LEI submitted an Agency Compliance Form (Noncompliance Report #1018) on 8/8/2024.  The Environmental Auditor communicated with all Spread LEIs on 8/14/2024 regarding the Bi-Weekly reporting period ending on 8/18/2024. The Environmental Auditor provided recommendations to upgrade SSB especially on steep slopes, streambanks, and below permanent waterbar end treatments where the current SSB is not functional due to higher flows. The Environmental Auditor also recommended conducting QA/QC on SWPPP VSIRs prior to submitting the documents to ensure all Sections are complete and consistent with the daily MVP Punchlist.							The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements. The Environmental Auditor recommends continued BMP monitoring throughout the Spread G Project. Based on the SWPPP, MVP Punchlist findings, and communication with the Lead Environmental Inspector, the Spread G Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Stormwater Management Act.  The Environmental Auditor recommends the contractor effectively communicates with the Spread G Environmental inspection staff.			
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										



MOUNTAIN VALLEY PIPELINE  
SPREAD G  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 8/19/2024 through 9/1/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/1/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>43</b> conducted from 8/19/2024 through 9/1/2024 (includes LY-026)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 8/19/2024 through 9/1/2024 (Includes Carry Over Items from 8/18/2024): <b>136</b>											
Total Number of ODCP Inspections at Laydown Yard 026: <b>7</b> (8/19/2024 through 8/25/2024); <b>6</b> (8/26/2024 through 8/31/2024)											
Total Number of VA DEQ Observations from 8/19/2024 through 9/1/2024: <b>1</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>3</b> (agricultural traffic and mowing activities)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damage to ESC measures caused by fallen debris): <b>0</b>											
<b>Total Number of Off Right of Way Impacts: 47 (1-3.</b> On 8/19/2024, the EIs observed three off right of way sediment impacts (within 100 feet of each other) within upland areas west of MVP-GI-234. On 8/17/2024, a storm event with high intensity/short duration rainfall produced approximately 0.4 inches of rainfall within .25 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframe via an extension request approval. No environmental resources were impacted. <b>4-10.</b> On 8/30/2024, the EIs observed 7 off right of way sediment impacts east of Gravelly Hill Road (6) and east of MVP-GI-238.01 (1). On 8/29/2024, a strong storm event with high intensity/short duration rainfall produced approximately 0.6 inches or rainfall within one hour causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframe. No environmental resources were impacted. <b>11-47.</b> On 9/1/2024, the EIs identified 37 off right of way sediment impacts within upland areas throughout locations in Giles County. On 8/31/2024, strong storm events with high intensity/short duration rainfall produced approximately 1.1-1.2 inches of rainfall in one hour causing ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified and the items have 24 hours to be completed within the required timeframe. It should be noted that four of the locations resulted in environmental resource impacts). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>5 (1.</b> On 8/30/2024, the EI observed an environmental resource impact at S-P6 west of Norcross Road. On late 8/29/2024 a thunderstorm with high intensity/short duration rainfall produced approximately 0.6 inches of rainfall in one hour causing ESC measures to become overwhelmed via concentrated runoff from permanent waterbar end treatments subsequently impacting approximately 50 feet of the stream. The VADEQ was immediately notified, landowner access granted, sediment removed, and the ESC/SWM measures repaired/maintained. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. <b>2-5.</b> On 9/1/2024, the EIs observed environmental resource impacts at S-P6 east of Gravelly Hill Road, S-MM18 east of Highway 42, S-NN12 east of Seven Oaks Road/MVP-GI-253.02, and S-NN11 west of Old Furnace Road/MVP-GI-256.02. On 8/31/2024, strong storm events with high intensity/short duration rainfall produced approximately 1.1-1.2 inches of rainfall in one hour causing ESC measures to become overwhelmed. At S-P6, approximately 20 feet of the stream was impacted. At S-MM18, approximately 25 feet of the stream was impacted. At S-NN12, approximately 300 feet of the stream was impacted. At S-NN11, approximately 100 feet of the stream was impacted. The VADEQ was immediately notified by the LEI and MVP Environmental staff. The MVP Environmental staff is in the process of preparing a Courtesy Notice of Force Majeure Declaration. These items have 24 hours to be completed within the required timeframe). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
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: <b>0</b>											
<b>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 8/19/2024 through 9/1/2024 .</b>											
CARRY OVER ITEMS FROM 8/18/2024											
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
11/12/2023		1		1			1	1 on 11/12/2023 Extended indefinitely until landowner permission has been granted			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
11/22/2023	0.9"-2.0" - 14 Hours *Rainfall occurred on 11/21/2023	2		2			2	2 on 11/22/2023 Extended indefinitely until landowner permission has been granted			Two items have been extended indefinitely via VADEQ approval until landowner permission is granted.
4/12/2024	0.6"-2.7" - 6 Hours *Storm event with intervals of high intensity/short duration rainfall occurred late 4/11/2024	3		3			3	3 on 4/12/2024 Extended indefinitely until landowner permission has been granted			Three items have been extended indefinitely via VADEQ approval until landowner permission is 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
8/19/2024	0.0"-0.2" - 2 Hours *Isolated storm event occurred on 8/17/2024	7		3			7 (includes off right of way impacts)	3 on 8/20/2024 to be completed upon landowner permission (includes off right of way impacts)	4 on 8/20/2024 3 on 8/23/2024 (extension request)		Seven items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Three of the items were identified as off right of way sediment impacts up to 15 feet within upland areas west of MVP-AR-234. On 8/17/2024, a storm event with high intensity short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe via an extension request approval. The LEI submitted an Agency Compliance Form (Problem Area Report #1030) on 8/19/2024. No environmental resources were impacted.
8/20/2024	0.0"-0.4" - 1 Hour *Scattered rainfall occurred on 8/19/2024	3				2	1			3 on 8/21/2024	Three items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Two of the identified items were caused by third party impacts related to agricultural traffic.
8/21/2024		5					5			5 on 8/22/2024	Five items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
8/22/2024		7					7		1 on 8/23/2024	4 on 8/24/2024 2 on 8/25/2024	Seven items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/23/2024		1					1			1 on 8/25/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
8/25/2024		3					3		3 on 8/26/2024		Three items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
8/27/2024		2				1	1			1 on 8/28/2024 1 on 8/29/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. One of the items was caused by third party impacts related to mowing activities.
8/28/2024		5					5		1 on 8/29/2024		Five items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
8/29/2024		2					2			2 on 8/30/2024	Two items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.

[illegible]



MOUNTAIN VALLEY PIPELINE  
SPREAD G  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 9/2/2024 through 9/15/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/15/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>37</b> conducted from 9/2/2024 through 9/15/2024 (includes LY-026): <b>Holiday on 9/2/2024</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 9/2/2024 through 9/15/2024 (Includes Carry Over Items from 9/1/2024): <b>109</b>											
Total Number of ODCP Inspections at Laydown Yard 026: <b>6</b> (9/2/2024 through 9/7/2024); <b>6</b> (9/9/2024 through 9/14/2024)											
Total Number of VA DEQ Observations from 9/2/2024 through 9/15/2024: <b>2</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>3</b> (landowner traffic)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damage to ESC measures caused by fallen debris): <b>0</b>											
<b>Total Number of Off Right of Way Impacts: 4 (1-2.</b> On 9/3/2024, the EI observed two off right of way sediment impacts within upland areas east and west of Old Furnace Road/MVP-GI-256.02. On 8/31/2024, strong storm events with high intensity/short duration rainfall produced approximately 1.1-1.2 inches of rainfall in one hour causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe with one location receiving an extension request approval. No environmental resources were impacted. <b>3-4.</b> On 9/5/2024, the EI observed two off right of way sediment impacts within upland areas west of MVP-GI-234. On 8/31/2024, strong storm events with high intensity/short duration rainfall produced approximately 1.1-1.2 inches of rainfall in one hour causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>0</b>											
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: <b>0</b>											
<b>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 9/2/2024 through 9/15/2024.</b>											
CARRY OVER ITEMS FROM 9/1/2024											
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
11/12/2023		1		1			1	1 on 11/12/2023 Extended indefinitely until landowner permission has been granted			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
11/22/2023	0.9"-2.0" - 14 Hours *Rainfall occurred on 11/21/2023	2		2			2	2 on 11/22/2023 Extended indefinitely until landowner permission has been granted			Two items have been extended indefinitely via VADEQ approval until landowner permission is granted.
4/12/2024	0.6"-2.7" - 6 Hours *Storm event with intervals of high intensity/short duration rainfall occurred late 4/11/2024	3		3			3	3 on 4/12/2024 Extended indefinitely until landowner permission has been granted)			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
9/1/2024	0.4"-1.5" - 1 Hour *Strong storm events occurred on 8/31/2024	67	4	37			67 (includes off right of way and environmental resource impacts)	35 on 9/2/2024 to be completed on 9/4/2024 (wet/safety conditions)  17 on 9/4/2024 to be completed on 9/7/2024 (wet/safety conditions)  4 on 9/4/2024 Extended indefinitely until landowner permission has been granted	14 on 9/2/2024 18 on 9/3/2024 9 on 9/4/2024 3 on 9/5/2024 1 on 9/6/2024	7 on 9/3/2024 7 on 9/5/2024 1 on 9/6/2024 3 on 9/7/2024	Sixty-seven items were identified requiring ESC and SWM repair/maintenance and 63 were completed within the required timeframes via extension request approvals. Thirty-seven items were identified as off right of way sediment impacts up to 200 feet within upland areas west of MVP-GI-234 (6), east of MVP-GI-237 (3), east of Gravely Hill Road (1), east of MVP-GI-238.01 (2), east of Highway 42 (11), east of Seven Oaks Road (11) and west of Old Furnace Road (3). On 8/31/2024, strong storm events with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted at 33 locations, ESC and SWM measures repaired/maintained and enhanced, sediment removed, and the areas stabilized within the required timeframes via extension request approvals. The LEI submitted Agency Compliance Forms (Problem Area Reports #1039, #1040, #1041, and #1042) on 9/1/2024. <b>The remaining four items received indefinite extension request approvals until landowner permission is granted.</b>  Four items were identified as environmental resource impacts at S-P6 (east of MVP-GI-237), S-MM18 (east of Highway 42), S-NN12 (east of Seven Oaks Road/MVP-GI-253.02), and S-NN11 (west of Old Furnace Road/MVP-GI-262). The strong storm events on 8/31/2024 caused ESC measures to become overwhelmed. At S-P6, approximately 20 feet of the stream was impacted. At S-MM18, approximately 25 feet of the stream was impacted. At S-NN12, approximately 300 feet of the stream was impacted. At S-NN11, approximately 100 feet of the stream was impacted. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/replaced and enhanced, sediment removed, and the areas stabilized within the required timeframe via extension request approvals. The LEI submitted Agency Compliance Forms (Problem Area Reports #1035, #1036, #1037, and #1038) on 9/1/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/3/2024 and a Final Notice of Force Majeure Declaration on 9/9/2024. <b>Refer to Environmental Auditor Field Observations and Recommendations for further discussion.</b>

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
9/3/2024		7		2			7 (includes off right of way impacts)	2 on 9/4/2024 to be completed by 9/7/2024 (wet conditions)	2 on 9/4/2024 2 on 9/5/2024 (extension requests)	2 on 9/4/2024 1 on 9/5/2024	Seven items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Two items were identified as off right of way sediment impacts approximately 10 feet within upland areas east and west of Old Furnace Road/MVP-GI-256.02. On 8/31/2024, strong storm events with high intensity short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframes with one location receiving an extension request approval. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (Problem Area Report #1043) on 9/3/2024.
9/5/2024		10		2		1	9 (includes off right of way impacts)		6 on 9/6/2024	4 on 9/6/2024	Ten items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to landowner traffic. Two items were identified as off right of way sediment impacts approximately 5 feet and 10 feet within upland areas west of MVP-GI-234. On 8/31/2024, strong storm events with high intensity short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted.
9/6/2024		6					6			6 on 9/7/2024	Six items were identified requiring ESC repair/maintenance and completed within the required timeframe.
9/10/2024		4				2	2			4 on 9/11/2021	Four items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Two of the identified items were caused by third party impacts related to landowner traffic.
9/11/2024		4					4		1 on 9/12/2024	1 on 9/12/2024 2 on 9/13/2024	Four items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
9/12/2024		1					1			1 on 9/13/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
9/13/2024		4					4		2 on 9/14/2024	2 on 9/14/2024	Four items were identified requiring ESC 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
9/10/2020		1					1			1 on 9/11/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
9/11/2024		1					1			1 on 9/13/2024	One item was identified requiring ESC 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
9/3/2024	The Environmental Auditor conducted site evaluations at the following locations: Seven Oaks Road/MVP-GI-253 (Access Road), Seven Oaks Road/MVP-GI-253.02 (CIS/GAS), Old Furnace Road/MVP-GI-256.02 (Access Road), and Old Furnace Road/MVP-GI-256.02 (CIS/GAS).	The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to hydraulic mulch not meeting ESC Plans application rate requirements, installing Soil Stabilization Blanket (SSB) where straw/hydraulic mulch are ineffective measures due to concentrated flow conditions, and installing enhanced ESC measures to minimize potential future off right of way/environmental resource impacts. The Environmental Auditor evaluated locations where the EIs identified off right of way and environmental resource impacts at S-MM18, S-NN12, and S-NN11 on 9/1/2024. At the time of the evaluations, the contractor staff was conducting off right of way sediment removal at accessible locations. It should be noted that many areas of the project requiring foot/equipment traffic were wet with unsafe conditions. The Environmental Auditor identified locations where SSB should be installed due to straw/hydraulic mulch not being an effective measure per Section 3.2 of the Annual Standards and Specifications (AS&S) due to concentrated flow conditions. The Environmental Auditor also recommended a Karst geologist evaluate an area downstream of S-NN12 to ensure no sensitive resources were impacted.
9/4/2024	The Environmental Auditor conducted site evaluations at the following locations: Gravely Hill Road (GAS), MVP-GI-234 (CIS/GAS), Norcross Road (CIS), MVP-GI-238.01 (GAS), and MVP-MLV-AR-25.	The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to a slope sloughing, enhancing sediment controls directly above a stream that has been previously impacted, large areas of right of way not stabilized following permanent SWM measures installation, proper application of hydraulic mulch to achieve proper coverage, stabilizing areas where repair/maintenance activities occurred, and installing SSB where rills/gullies occurred due to flow conditions. The Environmental Auditor evaluated locations where the EIs identified off right of way impacts and the environmental resource impact at S-P6 on 9/1/2024. The Environmental Auditor observed many locations throughout the right of way where permanent stabilization has not occurred following permanent SWM measures installation and locations where SSB should be installed due to straw/hydraulic mulch not being an effective measure per Section 3.2 of the AS&S due to concentrated flow conditions. The Environmental Auditor observed upland locations where the off right of way sediment has been removed and the impacted areas stabilized. The Environmental Auditor conducted an evaluation within S-P6 and observed the sediment removed at the time of the evaluation.
9/13/2024	The Environmental Auditor conducted site evaluations at the following locations: Cascade Drive (CIS), MVP-GI-241.02 (GAS), State Route 42 (CIS/GAS), Seven Oaks Road/MVP-GI-253.02 (CIS/GAS), Old Furnace Road/MVP-GI-256 (CIS/GAS), and MVP-CR-258.02 (Access Road)	The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to the following: properly installing SSB (embedding/anchoring), bare areas/shadowing where hydraulic mulch was applied, installing SSB on streambanks, stabilizing an previously identified off right of way impact area within an upland, installing additional ESC measures on an access road, and ensuring final stabilization is achieved within the required timeframe. The Environmental Auditor conducted follow up evaluations at locations where the EIs identified off right of way impacts on 9/1/2024 and 9/3/2024 and environmental resource impacts at S-MM18, S-NN12, and S-NN11 on 9/1/2024. At the time of the evaluation, it appeared that the sediment was removed, impacted areas stabilized, and the ESC and SWM measures repaired and/or enhanced.
9/2/2024 through 9/15/2024	<p>The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread G Project.</p> <p>The Environmental Auditor communicated with the LEI and EC regarding observations related to SWPPP VISR documentation. <b>Based on communication with the LEI, MVP-LY-028 has been permanently restored and SWPPP inspections will be conducted on a monthly basis beginning on 9/9/2024 via VADEQ approval.</b></p> <p>The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding locations where hydraulic mulch is not an effective measure per Section 3.2 of the AS&amp;S due to concentrated flow conditions causing this application to fail resulted in off right of way and environmental resource impacts at locations throughout the project area.</p> <p>On 9/13/2024, the EI observed soil binders hydraulically applied within 100 feet of stream crossings at S-MM18 (west of MVP-GI-253.02) and S-NN12 (west of MVP-GI-256.02). Based on the Agency Compliance Form (Noncompliance Report #1045) submitted by the LEI on 9/13/2024, these locations will be stabilized with SSB. Retraining will be conducted for the contractor staff to ensure regulations and ESC requirements are being followed.</p> <p>The Environmental Auditor communicated with all Spread LEIs on 9/10/2024 regarding the Bi-Weekly reporting period ending on 9/15/2024. The Environmental Auditor provided feedback on the following: ensuring that corrective action items noted in the VSIRs are added to the respective daily MVP Punchlists; enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the Annual Standards and Specifications due to concentrated flow resulting in erosion and/or off right of way/environmental resource impacts, properly embedding/anchoring SSB per the required ESC Plans, and inspecting compost filter sock for undermining subsequently resulting in erosion.</p>	The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements. The Environmental Auditor recommends continued BMP monitoring throughout the Spread G Project. Based on the SWPPP, MVP Punchlist findings, and communication with the Lead Environmental Inspector, the Spread G Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Stormwater Management Act. The Environmental Auditor recommends the Spread G Environmental inspection staff continues to communicate with the contractor regarding ineffective ESC measures not in compliance with Section 3.2 of the AS&S.
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?	No	On 9/13/2024, the EI observed soil binders hydraulically applied within 100 feet of stream crossings at S-MM18 (west of MVP-GI-253.02) and S-NN12 (west of MVP-GI-256.02). Based on the Agency Compliance Form (Noncompliance Report #1045) submitted by the LEI on 9/13/2024, these locations will be stabilized with SSB. Retraining will be conducted for the contractor staff to ensure regulations and ESC requirements are being followed.
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	

MOUNTAIN VALLEY PIPELINE  
SPREAD G  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 9/16/2024 through 9/29/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/29/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>34</b> conducted from 9/16/2024 through 9/29/2024 (includes LY-026); <b>SWPPP inspections postponed on 9/27/2024 due to hazardous right of way conditions as a result of Hurricane Helene.</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 9/16/2024 through 9/29/2024 (includes Carry Over Items from 9/15/2024): <b>264</b>											
Total Number of ODCP Inspections at Laydown Yard 026: <b>3</b> (9/16/2024 through 9/18/2024); <b>All refueling tanks were removed from MVP-LY-026 on 9/19/2024.</b>											
Total Number of VA DEQ Observations from 9/16/2024 through 9/29/2024: <b>1</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damage to ESC measures caused by fallen debris): <b>1</b>											
Total Number of Off Right of Way Impacts: <b>60</b> (1. On 9/19/2024, the EI observed an off right of way impact within an upland area east of Stevers Gap Trail. From 9/18/2024 into early 9/19/2024, a storm event from a tropical system with intervals of high intensity/short duration rainfall coupled with previous rainfall and saturated conditions produced approximately 0.9 inches of rainfall in 8 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the impacted area stabilized within the required timeframe. No environmental resources were impacted. <b>2-4.</b> On 9/20/2024, the EIs observed three off right of way sediment impacts within upland areas east of east of MVP-MN-266 (2) and east of Kow Camp Road #1 (1). On 9/19/2024, a storm event with high intensity/short duration rainfall produced approximately 0.8-0.9 inches of rainfall within .30 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframe. No environmental resources were impacted; however, a Karst feature at MVP-MN-266 was impacted. Communication and coordination with the VA Department of Conservation and Recreation (DCR) and the Karst geologists are ongoing. <b>5-49.</b> On 9/25/2024, the EIs observed 45 off right of way impacts within upland areas throughout Giles (44) and Montgomery Counties (1). It should be noted that three of the impacts were located within the Jefferson National Forest (JNF). On 9/24/2024, strong storms with high intensity/short duration rainfall coupled with saturated conditions produced approximately 1.3 to 3.85 inches of rainfall in one hour causing ESC and SWM measures to become overwhelmed. The VADEQ and USFS were immediately notified, landowner access granted, temporary ESC measure repaired/maintained, sediment removed, and the areas stabilized at 13 locations. Extension requests were approved for the remaining locations due to hazardous/saturated conditions. <b>50.</b> On 9/26/2024, the EI observed an off right of way impact within an upland area west of Cascade Drive. From 9/25/2024 into early 9/26/2024, heavy rainfall coupled with previous rainfall and saturated conditions produced approximately 3.5 inches of rainfall in 10 hours causing ESC measures to become overwhelmed. It should be noted that previous impacts occurred at this location where permanent waterbar end treatments contributed to the impacts. The VADEQ was immediately notified and an extension request was approved due to the hazardous/saturated right of way conditions. No environmental resources were impacted. <b>51-53.</b> On 9/28/2024, the EIs observed three off right of way impacts within upland areas west of MVP-GI-234 (1) and east of Gravelly Hill Road (2). On 9/27/2024, a heavy storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions produced approximately 0.8 inches of rainfall in three hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures repaired/enhanced, sediment removed, and the areas stabilized at 9 locations. Extension requests were approved for the remaining locations due to hazardous/saturated conditions. No environmental resources were impacted. <b>54-60.</b> On 9/29/2024, the EIs observed 7 off right of way impacts within upland areas west of MVP-GI-244 (1), east and west of MVP-GI-253.02 (3), and west of MVP-GI-256.02 (3). From 9/24/2024 through 9/27/2024, storm events up to and including remnants of Hurricane Helen produced approximately 10.75 inches of rainfall throughout area of the project. These storm events coupled with previous rainfall and saturated conditions caused flooding, severe erosion, and slopes to slough resulting in ESC and SWM measures to become damaged/overwhelmed. The VADEQ was immediately notified. The ESC and SWM measures will repaired/enhanced upon safe conditions and sediment will be removed upon landowner permission ). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>10</b> (1. On 9/20/2024, the EI observed an environmental resource impact at S-A32 west of Kow Camp Road #1. On late 9/19/2024, a storm event with high intensity/short duration rainfall produced approximately 0.9 inches of rainfall within .33 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the impacted area stabilized within the required timeframe. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/24/2024. <b>2-5.</b> On 9/25/2024, the EIs observed four environmental resource impacts at S-Q14 off of MVP-GI-234 (access road), S-MM17/W-MM10 off of MVP-GI-253.02 (access road), S-NN12 east of MVP-GI-253.02, and S-A32 west of Kow Camp Road #1. On 9/24/2024, strong storms with high intensity/short duration rainfall coupled with saturated conditions produced approximately 2.5-2.9 inches of rainfall in one hour causing ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified and extension requests were approved due to hazardous/saturated conditions. The Environmental Auditor evaluated MVP-GI-234 on 9/25/2024 and observed the contractor staff conducting access road repairs and installing temporary/enhanced ESC measures. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024. <b>6-7.</b> On 9/26/2024, the EIs observed environmental resource impacts at S-MN21 west of MVP-MLV-26 and S-Y21 off of MVP-GI-241.03 (access road). On 9/25/2024, heavy rainfall coupled with previous rainfall and saturated conditions produced approximately 3.5 inches of rainfall in 10 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified and extension requests were approved due to hazardous/saturated conditions. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024. <b>8.</b> On 9/27/2024, the EI observed an environmental resource impact at S-G32 east of Buffalo Anklets Road/MVP-GI-241.04. On 9/27/2024, remnants from Hurricane Helene coupled with previous rainfall events and saturated conditions produced over 7.5 inches of rainfall causing ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified and an extension request was approved due to hazardous/saturated conditions. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024. <b>9-10.</b> On 9/29/2024, the EIs observed environmental resource impacts at S-NN12 west of MVP-GI-256.02 and S-RR5 west of MVP-GI-244. From 9/25/2024 through 9/27/2024 heavy rainfall from remnants of Hurricane Helene coupled previous rainfall and saturated conditions produced approximately 6.9-8.75 inches of rainfall in 24 hours causing erosion and a slope to slough resulting in ESC/SWM measures becoming overwhelmed. The VADEQ was immediately notified. The ESC and SWM measures are slated to repaired/enhanced and sediment will be removed upon landowner permission. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
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: <b>0</b>											
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 9/16/2024 through 9/29/2024.											
CARRY OVER ITEMS FROM 9/15/2024											
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
11/12/2023		1		1			1	1 on 11/12/2023 Extended indefinitely until landowner permission has been granted			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
11/22/2023	0.9"-2.0" - 14 Hours *Rainfall occurred on 11/21/2023	2		2			2	2 on 11/22/2023 Extended indefinitely until landowner permission has been granted			Two items have been extended indefinitely via VADEQ approval until landowner permission is granted.
4/12/2024	0.6"-2.7" - 6 Hours *Storm event with intervals of high intensity/short duration rainfall occurred late 4/11/2024	3		3			3	3 on 4/12/2024 Extended indefinitely until landowner permission has been granted			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
9/1/2024	0.4"-1.5" - 1 Hour *Strong storm events occurred on 8/31/2024	4		4			4	4 on 9/4/2024 Extended indefinitely until landowner permission has been granted			Four items identified as off right of way impacts within upland areas have been extended indefinitely via VADEQ approval until landowner permission is 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
9/16/2024		3					3		1 on 9/17/2024	2 on 9/17/2024	Three items were identified requiring ESC repair/maintenance and completed within the required timeframe.
9/17/2024	0.1"-0.6" - 12 Hours *Storm event from a tropical system occurred late on 9/16/2024	4					4			2 on 9/19/2024 2 on 9/20/2024	Four items were identified requiring ESC repair/maintenance and completed within the required timeframe.

9/18/2024	0.0"-1.0" - 10 Hours *Scattered storms from a tropical system occurred on 9/17/2024	1					1		1 on 9/19/2024		One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
9/19/2024	0.0"-1.0" - 8 Hours *Scattered storms from a tropical system occurred on 9/18/2024 into early 9/19/2024	6		1			6 (includes off right of way impact)		4 on 9/20/2024	2 on 9/20/2024	Four items were identified requiring ESC repair/maintenance and completed within the required timeframe. One item was identified as an off right of way impact approximately 10 feet within an upland area west of Stevers Gap Trail. From 9/18/2024 into early 9/19/2024, a storm event from a tropical system with intervals of high intensity/short duration rainfall coupled with previous rainfall and saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted.
9/20/2024	0.0"-0.9" - 30 Hours *Isolated strong thunderstorms with high intensity/short duration rainfall occurred late on 9/19/2024	16	1	3			16 (includes off right of way and environmental resource impacts)	1 on 9/21/2024 to be completed on 9/28/2024 (engineering review/redlines)	8 on 9/21/2024 1 on 9/23/2024 (extension request)	1 on 9/21/2024 6 on 9/22/2024	<p>Sixteen items were identified requiring ESC repair/maintenance and completed within the required timeframe. Three of the items were identified as off right of way impacts approximately 20, 100, and 8 feet within upland areas east of MVP-MN-266 (2) and east of Kow Camp Road #1 (1).</p> <p>On 9/19/2024, strong storm events in a short duration coupled with existing saturated conditions caused ESC measures to become overwhelmed at MVP-MN-266. At one of the off right of way locations the sediment subsequently impacted a Karst feature. The Spread G environmental inspection staff, MVP Environmental staff, and Karst geologist have been communicating/coordinating with VA Department of Conservation and Recreation pertaining to this issue. At Kow Camp Road #1, the storm event caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted at two of the locations; however, the off right of way impact at Kow Camp Road #1 subsequently resulted in an environmental resource impact to S-A32. The LEI submitted an Agency Compliance Forms (PAR #1048 and #1049) on 9/20/2024.</p> <p>One item was identified as an environmental resource impact at S-A32. Sediment laden runoff traveled through an existing road culvert impacting approximately 15 feet of the stream off south of the right of way as a result of the storm event. The VADEQ was immediately notified, landowner access granted, sediment removed, and the area stabilized. The LEI submitted an Agency Compliance Form (Problem Area Report #1048) on 9/20/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/24/2024. The Environmental Auditor evaluated the off right of way impacts and environmental resource impact at S-A32 and provided recommendations to install enhanced ESC measures to maintain compliance with Section 3.2 of the Annual Standards and Specifications (AS&amp;S) and ESC Plan requirements.</p>
9/23/2024		3					3		1 on 9/24/2024	2 on 9/24/2024	Three items were identified requiring ESC repair/maintenance and completed within the required timeframe.
9/25/2024	1.05"-3.85" - 1 Hour *Strong storms with high intensity/short duration rainfall occurred on 9/24/2024	131	4	45			131 (includes off right of way and environmental resource impacts)	131 on 9/26/2024 to be completed on 10/1/2024 due to hazardous/saturated conditions	17 on 9/29/2024	13 on 9/29/2024	<p>One hundred thirty-one items were identified requiring ESC and SWM repair/maintenance and 30 were completed within the required timeframe via extension request approvals. Forty-five of the items were identified as off right of way impacts up to 100 feet within upland areas in Giles (44) and Montgomery Counties (1). On 9/24/2024, storm events with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures temporarily repaired/enhanced, sediment removed, and the areas stabilized at 13 locations. The remaining 32 locations received extension request approvals due to hazardous/saturated conditions. The LEI submitted Agency Compliance Forms (Problem Area Reports #1057, #1058, #1059, #1063, and #1064) on 9/25/2024.</p> <p>Four items were identified as environmental resource impacts at S-Q14 below MVP-GI-234 (access road), S-MM17/W-MM10 at MVP-GI-253.02 (access road), S-NN12 east of MVP-GI-253.02, and S-A32 west of Kow Camp Road #1. The strong storm event caused ESC measures to become overwhelmed. Based on a site evaluation at Kow Camp Road #1, the Environmental Auditor observed severe erosion on the slope above S-A32 and it appeared runoff from the permanent waterbars and end treatments contributed to the erosion. The VADEQ was immediately notified and these items received extension request approvals due to hazardous/saturated conditions. The Environmental Auditor conducted a site evaluation at MVP-GI-234 on 9/25/2024 and observed the contractor staff conducting repairs to the access road and installing temporary ESC measures. The LEI submitted Agency Compliance Forms (Problem Area Reports #1053, #1054, #1055, and #1056) on 9/25/2024. The MVP Environmental staff submitted a Courtesy Notice Force of Majeure Declaration on 9/29/2024.</p> <p><b>A total of 101 remaining items received extension request approvals due to hazardous/saturated conditions.</b></p>
9/26/2024	1.7"-3.5" - 10 Hours *Storm event from remnants of Hurricane Helene with intervals of high intensity rainfall occurred on 9/25/2024 into early 9/26/2024	46	2	1			46 (includes off right of way and environmental resource impacts)	46 on 9/27/2024 to be completed on 10/1/2024 due to hazardous/saturated conditions	3 on 9/29/2024	2 on 9/29/2024	<p>Forty-six items were identified requiring ESC and SWM repair/maintenance and 5 were completed within the required timeframe via extension request approvals. One item was identified as an off right of way impact approximately 15 feet within an upland area west of Cascade Drive. From 9/25/2024 through 9/27/2024 heavy rainfall from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified and an extension request was approved due to hazardous/saturated conditions. No environmental resources were impacted. It should be noted that previous issues occurred at this location and an engineering review will be conducted to implement permanent/enhanced measures. Based on a previous field evaluation conducted by the Environmental Auditor, it appears concentrated runoff from the permanent waterbar end treatments is contributing to the redundant impacts.</p> <p>Two items were identified as environmental resource impacts at S-MN21 west of Mt. Tabor Road and S-YZ1 at MVP-GI-241.03 (access road). The heavy rainfall event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused extensive erosion on the right of way resulting in the ESC measures becoming overwhelmed subsequently impacting S-MN21. Extensive runoff at MVP-GI-241.03 caused the access road to washout overwhelming the ESC measures subsequently impacting S-YZ1. The VADEQ was immediately notified and extension requests were approved due to hazardous/saturated conditions. The LEI submitted Agency Compliance Forms (Problem Area Reports #1065 and #1079) on 9/26/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024.</p> <p><b>A total of 41 remaining items received extension request approvals due to hazardous/saturated conditions.</b></p>
9/27/2024	0.4"-1.5" - 3 Hours *Storm event from remnants of Hurricane Helene occurred on 9/26/2024	8	1				8 (includes environmental resource impact)	8 on 9/28/2024 to be completed on 10/1/2024 due to hazardous/saturated conditions			<p>Eight items were identified requiring ESC and SWM repair/maintenance. One item was identified as an environmental resource impact approximately 30 feet within S-G32 east of Buffalo Anklets Road/MVP-GI-241.04. On 9/27/2024, remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed. Based on a field evaluation conducted by the Environmental Auditor on 9/25/2024, it appeared that runoff from the permanent waterbars and end treatments caused severe erosion on the slope. The VADEQ was immediately notified and extension requests were approved due to hazardous/saturated conditions. The Assistant LEI submitted an Agency Compliance Form (Problem Area Report #1067) on 9/27/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024.</p> <p><b>A total of 8 items received extension request approvals due to hazardous/saturated conditions.</b></p>
9/28/2024	0.5"-1.9" - 5 Hours *Storm event from remnants of Hurricane Helene occurred on 9/27/2024	15		3	1		15 (includes off right of way impacts)	11 on 9/29/2024 to be completed on 10/1/2024 due to hazardous/saturated conditions	3 on 9/29/2024 (1 off right of way impact)	1 on 9/29/2024	<p>Fifteen items were identified requiring ESC and SWM repair/maintenance and four were completed within the required timeframe. One of the identified items was caused by weather related damage due to a fallen tree. Three items were identified as off right of way impacts approximately 75, 10, and 20 feet within upland areas west of MVP-GI-234 (1) and east of Gravely Hill Road (2). From 9/25/2024 through 9/27/2024, a prolonged storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the areas stabilized east of Gravely Hill Road. The ESC and SWM measures are slated to be repaired/enhanced and sediment will be removed upon landowner permission at the two locations west of MVP-GI-234. No environmental resources were impacted. The Environmental Coordinator submitted an Agency Compliance Form (Problem Area Report #1072) on 9/28/2024.</p> <p><b>A total of 11 items received extension request approvals due to hazardous/saturated conditions.</b></p>

9/29/2024		*21	2	7			21 (includes off right of way and environmental resource impacts)				Twenty-one items were identified requiring ESC and SWM repair/maintenance. Seven of the items were identified as off right of way impacts up to 30 feet within upland areas west of MVP-GI-244 (1), east and west of MVP-GI-253.02 (3), and west of MVP-GI-256.02 (3). From 9/24/2024 through 9/27/2024, a prolonged storm event from remnants of Hurricane Helene coupled previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified. The ESC and SWM measures are slated to repaired/enhanced and sediment will be removed upon landowner permission. The LEI submitted an Agency Compliance Form (Problem Area Report #1071) on 9/29/2024.  Two of the items were identified as environmental resource impacts at S-NN12 west of MVP-GI-256.02 and S-RR5 west of MVP-GI-244. The storm events leading up to and including remnants from Hurricane Helene caused ESC measures to become overwhelmed subsequently impacting approximately 100 feet of S-NN12 and the slope to slough resulting in ESC/SWM measures becoming overwhelmed at S-RR5. The VADEQ was immediately notified. The ESC and SWM measures are slated to repaired/enhanced and sediment will be removed upon landowner permission. The LEI submitted Agency Compliance Forms (Problem Area Reports #1073 and #1074) on 9/29/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration.  Eleven items have 24 Hours and 10 items have 72 Hours to be completed within the required timeframe. *It should be noted that one punchlist item was redundant and not included as it was noted on 9/25/2024.
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
9/18/2024	0.0"-1.0" - 10 Hours *Storm event from a tropical system occurred on 9/17/2024	1					1			1 on 9/19/2024	One item was identified requiring ESC 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			
9/23/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-MN-266 (CIS); MVP-MN-266.03 (CIS/GAS), Mt. Tabor Road (CIS/GAS), Kow Camp Road #1 (CIS/GAS), and Doe Creek Road (CIS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to straw mulch as an ineffective measures due to concentrated flow conditions per Section 3.2 of the AS&S and conducting ESC measures repair/maintenance. The Environmental Auditor evaluated locations where the EIs identified off right of way and environmental resource impacts at MVP-GI-266 (CIS) and Kow Camp Road #1 on 9/20/2024. At MVP-MN-266, the Environmental Auditor observed the slope repaired and ESC measures repaired/enhanced, the off right of way sediment removed, and the impacted area above the Karst feature seeded. The Environmental Auditor recommended installing Soil Stabilization Blanket (SSB) on the slope where concentrated flow conditions caused erosion that resulted in the off right of way impacts. At Kow Camp Road #1, the Environmental Auditor observed the sediment removed from S-A32 and the adjacent upland location and stabilized. The Environmental Auditor observed recent erosion impacts on the slope east Kow Camp Road where the recent repairs were conducted. The Environmental Auditor recommended installing SSB where areas of concentrated flow caused the erosion resulting in sediment build up at the permanent waterbar end treatments and sediment control measures. The Environmental Auditor also communicated a recommendation to install triple stack compost filter sock (CFS) on the slope directly above (east) Kow Camp Road to enhance sediment trapping.			
9/25/2024	The Environmental Auditor conducted site evaluations at the following locations: Kow Camp Road #1 (CIS/GAS), Kow Camp Road #2 (CIS), MVP-GI-241.04 (CIS/GAS), MVP-GI-234 (access road), MVP-GI-234 (CIS/GAS), and MVP-GI-235/MVP-GI-236 (access roads).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor conducted evaluations following heavy recent rainfall events. At S-A32, the Environmental Auditor observed severe erosion on the west slope above the stream that subsequently resulted in an off right of way and environmental resource impact. The Environmental Auditor observed off right of way impacts Kow Camp Road #2 and MVP-GI-241.04. The Environmental Auditor conducted an evaluation at MVP-GI-234 where runoff from heavy rain caused severe erosion on the access road resulting in an environmental resource impact at S-Q14. At the time of the evaluation, the contractor staff was conducting access road repairs and installing temporary ESC measures. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to conducting ESC measures repair/replacement, installing enhanced ESC measures where the current measures are no longer effective per Section 3.2 of the AS&S. Based on communication with the LEI and MVP Environmental staff, engineer reviews will be conducted at locations where permanent/enhanced measures need to be implemented.			
9/16/2024 through 9/29/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread G Project.  The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations related to SWPPP VSIR and daily MVP Punchlist documentation.  The Environmental Auditor communicated with all Spread LEIs on 9/24/2024 regarding the Bi-Weekly reporting period ending on 9/29/2024, Partial Bi-Weekly reporting period (End of Q3 2024) ending on 9/30/2024, and the Q3 2024 reporting period ending on 9/30/2024. The Environmental Auditor provided feedback/recommendations on the following: enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the AS&S and ESC requirements due to steep slopes and concentrated flow conditions resulting in erosion, communicating with the contractor to upgrade the SSB where low grade types are not efficient on steep slopes, concentrated flow conditions, and exhibit low functional longevity, and monitor areas where there is minimal to no vegetative growth and conducted restabilization activities as necessary (includes adding additional lime and fertilizer). It should be noted that the Environmental Auditor also communicated with the MVP Environmental staff on occasions to consider adding biotic soil amendments where soils exhibit low fertility to assist with developing an organic layer over time.							The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements. The Environmental Auditor recommends continued BMP monitoring throughout the Spread G Project. Based on the SWPPP, MVP Punchlist findings, and communication with the Lead Environmental Inspector, the Spread G Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Stormwater Management Act. The Environmental Auditor recommends communicating with the Spread G Environmental inspection staff to ensure SWPPP Inspection corrective action items are added to the respective daily MVP Punchlist(s) and conducting QA/QC of the VSIRs.			
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										



MOUNTAIN VALLEY PIPELINE  
SPREAD G  
ENVIRONMENTAL AUDITOR PARTIAL BI-WEEKLY REPORT - 9/30/2024 (END OF Q3 2024 REPORTING PERIOD)

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/30/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 3 conducted on 9/30/2024 (includes LY-026)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations on 9/30/2024 (Includes Carry Over Items from 9/29/2024): 2											
Total Number of ODCP Inspections at Laydown Yard 026: All refueling tanks were removed from MVP-LY-026 on 9/19/2024.											
Total Number of VA DEQ Observations on 9/30/2024: 0											
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 (damage to ESC measures caused by 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 on 9/30/2024.											
CARRY OVER ITEMS FROM 9/30/2024											
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
11/12/2023		1		1			1	1 on 11/12/2023 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
11/22/2023	0.9"-2.0" - 14 Hours *Rainfall occurred on 11/21/2023	2		2			2	2 on 11/22/2023 extended indefinitely to be completed upon landowner permission			Two items have been extended indefinitely via VADEQ approval until landowner permission is granted.
4/12/2024	0.6"-2.7" - 6 Hours *Storm event with intervals of high intensity/short duration rainfall occurred late 4/11/2024	3		3			3	3 on 4/12/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
9/1/2024	0.4"-1.5" - 1 Hour *Strong storm events occurred on 8/31/2024	4		4			4	4 on 9/4/2024 extended indefinitely to be completed upon landowner permission			Four items have been extended indefinitely via VADEQ approval until landowner permission is granted.
9/25/2024	1.05"-3.85" - 1 Hour *Strong storms with high intensity/short duration rainfall occurred on 9/24/202	101	4	32			101 (includes off right of way and environmental resource impacts)	101 on 9/26/2024 to be completed on 10/1/2024 due to hazardous/saturated conditions	9 on 9/30/2024 (4 off right of way impacts)	6 on 9/29/2024	One hundred one items were identified requiring ESC and SWM repair/maintenance and 15 were completed within the required timeframe via extension request approvals. Thirty-two of the items were identified as off right of way impacts within upland areas throughout Giles and Montgomery Counties. At four of those locations, landowner access was granted, ESC measures were repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframe via extension request approvals. Four items were identified as environmental resource impacts at S-Q14 off of MVP-GI-234 (access road), S-MM17/W-MM10 off of MVP-GI-253.02 (access road), S-NN12 east of MVP-GI-253.02, and S-A32 west of Kow Camp Road #1. These items received extension request approvals due to hazardous/saturated conditions. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024. The 86 remaining items received extension request approvals due to hazardous/wet conditions.
9/26/2024	1.7"-3.5" - 10 Hours *Precipitation with intervals of high intensity rainfall occurred on 9/25/2024 into early 9/26/2024	41	2	1			41 (includes off right of way and environmental resource impacts)	41 on 9/27/2024 to be completed on 10/1/2024 due to hazardous/saturated conditions	5 on 9/30/2024 (1 environmental resource impact)	3 on 9/30/2024	Forty-one items were identified requiring ESC and SWM repair/maintenance and 8 were completed within the required timeframe via extension request approvals. One item was identified as an off right of way impact approximately 15 feet within an upland area west of Cascade Drive. From 9/25/2024 through 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified and an extension request was approved due to hazardous/saturated conditions. No environmental resources were impacted. It should be noted that previous issues occurred at this location and an engineering review will be conducted to implement permanent/enhanced measures. Based on a previous field evaluation conducted by the Environmental Auditor, it appears concentrated runoff from the permanent waterbar end treatments is contributing to the redundant impacts.  Two items were identified as environmental resource impacts at S-MN21 west of MVP-MLV-26 and S-YZ1 at MVP-GI-241.03 (access road). At S-YZ1, landowner access was granted, the access road repaired, ESC measures repaired/enhanced, access road gravel removed from the stream, and the area stabilized within the required timeframe via an extension request approval. An extension request was approved for S-MN21 due to hazardous/saturated conditions. The LEI submitted Agency Compliance Forms (PARs #1065 and #1079) on 9/26/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024. The 33 remaining items received extension request approvals due to hazardous/wet conditions.
9/27/2024	0.4"-1.5" - 3 Hours *Rainfall from remnants of Hurricane Helene occurred on 9/26/2024	8	1				8 (includes environmental resource impact)	8 on 9/28/2024 to be completed on 10/1/2024 due to hazardous/saturated conditions	1 on 9/30/2024	5 on 9/30/2024	Eight items were identified requiring ESC and SWM repair/maintenance and 6 were completed within the required timeframe. One item was identified as an environmental resource impact at S-G32 east of Buffalo Anklets Road/MVP-GI-241.04. The storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused extensive erosion on the right of way resulting in the ESC and SWM measures becoming overwhelmed. It should be noted that the EI evaluated this location on 9/25/2024 and observed runoff from the permanent waterbars and end treatments contributing to the erosion. The VADEQ was immediately notified and an extension request was approved due to hazardous/saturated conditions. The LEI submitted an Agency Compliance Form (Problem Area Report #1067) on 9/27/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 9/29/2024. The two remaining items received extension request approvals due to hazardous/wet conditions.

9/28/2024	0.5"-1.9" - 5 Hours *Rainfall from remnants of Hurricane Helene occurred on 9/27/2024	11		2	1		11 (includes off right of way impacts)	11 on 9/29/2024 to be completed on 10/1/2024 due to wet conditions			Eleven items were identified requiring ESC and SWM repair/maintenance. One of the identified items was caused by weather related damage due to a fallen tree. Two items were identified as off right of way impacts within upland areas west of MVP-GI-234 (1) and east of Gravely Hill Road (2). <b>These items received extension request approvals due to hazardous/wet conditions.</b>
9/29/2024		21	2	7			21 (includes off right of way and environmental resource impacts)	7 on 9/30/2024 to be completed on 10/5/2024  14 on 9/30/2024 10/14/2024	2 on 9/30/2024 (1 off right of way impact)		Twenty-one items were identified requiring ESC and SWM repair/maintenance and two were completed in the required timeframe. One of the completed items was an off right of way impact west of MVP-GI-256.02. The VADEQ was previously notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe. Six of the remaining items were identified as off right of way impacts within upland areas west of MVP-GI-244 (1), east and west of MVP-GI-253.02 (3), and west of MVP-GI-256.02 (2). These items received an extension request approval due to hazardous/saturated conditions.  Two of the items were identified as environmental resource impacts at S-NN12 west of MVP-GI-256.02 and S-RR5 west of MVP-GI-244. These items received an extension request approval due to hazardous/saturated conditions. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure. <b>The 19 remaining items received extension request approvals due to hazardous/wet conditions.</b>
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
9/30/2024	0.1"-1.5" - 5 Hours *Precipitation with locations receiving intervals of high intensity/short duration rainfall occurred on late 9/29/2024 into early 9/30/2024	2					2				Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. <b>These items have three days to be completed within the required timeframe.</b>
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
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			
9/30/2024	<p>The Environmental Auditor reviewed and noted the daily MVP Punchlists and SWPPP VSIRs to be compliant during this reporting period for the Spread G Project.</p> <p>The Environmental Auditor communicated with all Spread LEIs on 9/24/2024 regarding the Bi-Weekly reporting period ending on 9/29/2024, Partial Bi-Weekly reporting period (End of Q3 2024) ending on 9/30/2024, and the Q3 2024 reporting period ending on 9/30/2024. The Environmental Auditor provided feedback/recommendations on the following: enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the AS&amp;S and ESC requirements due to steep slopes and concentrated flow conditions resulting in erosion, communicating with the contractor to upgrade the SSB where low grade types are not efficient on steep slopes, concentrated flow conditions, and exhibit low functional longevity, and monitor areas where there is minimal to no vegetative growth and conducted restabilization activities as necessary (includes adding additional lime and fertilizer). It should be noted that the Environmental Auditor also communicated with the MVP Environmental staff on occasions to consider adding biotic soil amendments where soils exhibit low fertility to assist with developing an organic layer over time.</p>							<p>The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements. The Environmental Auditor recommends continued BMP monitoring throughout the Spread G Project. Based on the SWPPP, MVP Punchlist findings, and communication with the Lead Environmental Inspector, the Spread G Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Stormwater Management Act.</p>			
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										



# **Mountain Valley Pipeline Project – Spread H**

## **Environmental Auditor Quarterly Report for Q3 2024**

### **October 15, 2024**

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#### **Environmental Auditor Contact Information**

Joe Crea, CPESC, CPSWQ  
Tetra Tech  
661 Anderson Drive, Suite 200  
Pittsburgh, Pennsylvania 15220

#### **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 12005+00 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 Stormwater Management Act, 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 Department of Environmental Quality (VADEQ) Erosion and Sediment Control (ESC)/Stormwater Management (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 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. This reporting period covers July 1, 2024, through September 30, 2024 (Q3 reporting period).

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

- Montgomery, Roanoke, and Franklin Counties
  - 12005+00-13415+51
  - Laydown Yards: PY-006 and LY-049

\*The following portions of the right of way have been permanently restored via final grading and permanent stabilization per the approved Annual Standard and Specification (AS&S) details and the ESC/Post Construction SWM Plans:

- 12005+00-12587+90; 12630+03-13415+51 (includes permanent access roads)

\*It should be noted that from 9/24/2024 through 9/27/2024, heavy rainfall events and previous rainfall events leading up to and including remnants from Hurricane Helene caused severe erosion and sloughing impacts throughout the right of way within Montgomery and Roanoke Counties. As a result of the impacts, additional contractor staff including heavy equipment will be mobilized to conduct permanent repairs/enhancements. Repair and restabilization activities will entail the use of previously restored access roads and reinstalling temporary bridges across environmental resources to access the impacted areas. Information related to these upcoming activities will be provided in the Q4 2024 report.

## **II. Information Reviewed to Prepare Quarterly Report**

The Environmental Auditor utilized the following provided resources/information to assist with evaluating project compliance throughout the Q3 reporting period:

- Daily MVP Punch Lists (includes VADEQ findings);
- Environmental Auditor Bi-Weekly Reports;
- Frequent Communication with the MVP Environmental staff, Chief EI, LEI, Assistant LEI, and Environmental Coordinator (EC);
- Stormwater Pollution Prevention Plan VSIRs;
- Spread H Rain Gauge Data;
- Spread H Scatter Sheets (Contractor Available Resources and Daily Work Locations);
- Annual Project Specific Standards and Specifications;
- Oil Discharge Contingency Plan (ODCP) Inspection reports;
- Storm Water Pollution Prevention Plans, Erosion and Sediment Control Plans, and Post Construction Stormwater Management Plans;
- MVP 48-Hour Aquatic Resource Notifications;
- VA Off Right of Way Sediment Impact Tracker Spreadsheet;
- Agency Compliance Forms - Problem Area Reports (PARs) and Noncompliance Reports (NCRs);
- Notice of Force Majeure Declaration submitted to the VADEQ on 7/15/2024, 7/28/2024, and 8/2/2024; and
- Landowner/Third Party Reported Complaints received by the VADEQ on 7/23/2024, 7/24/2024, 7/25/2024, 8/17/2024, and 8/27/2024 (Source: VADEQ website)

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

The following sections III. through VI. provide an overall summary for the 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 EIs observed a total of 420 daily MVP Punchlist items (includes Carry Over items) requiring repair/maintenance throughout the Q3 reporting period. The Environmental Auditor noted 5 items identified by the EIs as ESC measures damaged due to impacts caused by third party activities related to landowner and unauthorized traffic. One weather related impact was caused by a fallen tree during a heavy rainfall/wind event from remnants of Hurricane Helene. The ESC measures were subsequently repaired/maintained within the required timeframes and no environmental resources were impacted due to the third-party impacts.

During the Q3 reporting period the Spread H Environmental inspection staff observed 20 off right of way impacts within upland locations and 11 environmental resource impacts at S-MM22 (MVP-MN-278.01), two separate impacts at S-IJ50 (MVP-RO-279.01), S-G40 (MVP-MN-268.01), S-PP23 (MVP-MN-268.01), S-G39 (MVP-MN-268.01), S-MM15 (MVP-MN-270), two separate impacts at S-EF19 (MVP-MN-278.01), W-IJ62 (MVP-RO-287), and W-KL1 (MVP-RO-288).

On 7/5/2024, the EIs observed three right of way sediment impacts at the MVP-RO-281 access road (1) and west of MVP-RO-282 up to 50 feet within upland areas. On 7/4/2024, a storm event with high intensity/short duration rainfall caused ESC measures to become overwhelmed resulting in a gravel impact at MVP-RO-281 and sediment impacts west of MVP-RO-282. The VADEQ was immediately notified and the ESC measures repaired/enhanced within the required timeframe. Indefinite extension requests were approved by the VADEQ until landowner permission is granted. No environmental resources were impacted. The LEI submitted Agency Compliance Forms (PARs #954 and #955) on 7/5/2024. **Refer to Section VI. for further discussion.**

On 7/5/2024, the EI observed an environmental resource impact at S-IJ50 east of MVP-RO-279.01. On 7/4/2024, a storm event with high intensity/short duration rainfall caused severe erosion and portions of a slope to slough overwhelming the ESC measures and subsequently impacting approximately 400 feet of the stream. The VADEQ was immediately notified, landowner access granted, ESC measures replaced/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. The LEI submitted an Agency Compliance Form (PAR #953) on 7/5/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 7/15/2024. **Refer to Section VI. for further discussion.**

On 7/9/2024, the EI observed an off right of way sediment impact paralleling the right of way for approximately 900 linear feet extending 30 feet off right of way within an upland area east of MVP-MN-278.01. On 7/4/2024, a strong storm event with high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. The LEI submitted an Agency Compliance Form (PAR #975) on 7/9/2024. It should be noted that this event subsequently impacted S-MM22. **Refer to Section VI. for further discussion.**

On 7/9/2024, the EI observed an environmental resource impact at S-MM22 east of MVP-MN-278.01 as a result of an off right of way impact on the slope east of the stream. On 7/4/2024, a strong storm event with high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. The LEI submitted an Agency Compliance Form (PAR #975) on 7/9/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 7/15/2024. **Refer to Section VI. for further discussion.**

On 7/15/2024, the Assistant LEI observed an off right of way sediment impact approximately 100 feet within an upland area east of MVP-MN-278.01. A slough occurred on a steep slope due to extremely dry soil conditions. The VADEQ was immediately notified and the ESC measures were enhanced to minimize potential future dust related impacts. An indefinite extension request was approved by the VADEQ until landowner permission is granted. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #982) on 7/20/2024.

On 7/18/2024, the EI observed an environmental resource impact at S-IJ50 east of MVP-RO-279.01. On 7/18/2024, a strong storm event with high intensity/short duration rainfall caused a slope to slough. This event resulted in ESC and SWM measures becoming overwhelmed and subsequently impacting approximately 500 feet of the stream. It should be noted that the contractor was in the process of completing repairs on the slope from the 7/5/2024 impacts. The VADEQ was immediately notified, landowner access granted, temporary ESC measures installed, sediment removed from the stream, and the area stabilized within the required timeframe via a long term extension request. The Spread H

Environmental inspection staff, contractor staff, and MVP Environmental staff developed and implemented enhanced ESC measures that entailed rip rap installation on a portion of the slope. Due to severe topographic and saturated conditions, remedial activities within S-IJ50 were conducted mostly using hand tools. The rip rap installation and sediment removal from S-IJ50 (verified and approved by the VADEQ aquatic biologist) was completed on 8/20/2024. The LEI submitted an Agency Compliance Form (PAR #953-revised from 7/5/2024) on 7/18/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 7/28/2024. **Refer to Section VI. for further discussion.**

On 7/21/2024, the EI observed an off right of way sediment impact approximately 1500 feet within an upland area east of MVP-MN-268.01. On 7/21/2024, strong storm events coupled with existing saturated conditions caused a slip which overwhelmed ESC measures. Sediment traveled to an off-ROW drainage feature which conveyed sediment to S-PP23 and S-G40. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. The LEI submitted an Agency Compliance Form (PAR #984) on 7/21/2024. **Refer to Section VI. for further discussion.**

On 7/21/2024, the EI observed two environmental resource impacts at S-PP23 and S-G40 east of MVP-MN-268.01 as a result of the off right of way impact. On 7/21/2024, strong storm events coupled with existing saturated conditions caused a slope to fail east of the streams. The sediment traveled approximately 1500 feet within a drainage feature subsequently impacting the streams. The impact extended approximately 2,000 feet downstream from the right of way. The VADEQ was immediately notified, landowner access granted, ESC and SWM measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. The LEI submitted an Agency Compliance Form (PAR #984) on 7/21/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 7/28/2024. **Refer to Section VI. for further discussion.**

On 7/23/2024, the EIs observed 6 off right of way sediment impacts up to 400 feet within upland areas west of MVP-RO-282, northwest of MVP-MN270, east of MVP-MN-268.01, east of MVP-MN-276.03, and both east and west of MVP-MN-278.01 (2). On 7/22/2024 and 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. It should be noted that runoff from the permanent waterbar end treatments contributed to the erosion and subsequent off right of way impacts. The VADEQ was immediately notified, landowner access was granted at five locations, ESC measures repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframe via extension request approvals. Erosion and Sediment Control measures were installed at the remaining location where landowner permission has not been granted and an indefinite extension request was approved by the VADEQ. It should be noted that two incident locations resulted in environmental resource impacts at S-G39 and S-MM15. The LEI submitted Agency Compliance Forms (PARs #996, #1000, and #1007) for three of the off right of way impacts on 7/23/2024 and 7/24/2024. **Refer to Section VI. for further discussion.**

On 7/23/2024, the EIs observed three environmental resource impacts at S-G39 east of MVP-MN-268.01, S-MM15 east of MVP-MN-270, and S-EF19 east of MVP-MN-278.01. On 7/22/2024 and 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. At S-G39, erosion caused sloughing on the west slope subsequently impacting the stream. At S-MM15, significant erosion occurred along the edge of the right of way impacting approximately 400 feet off right of way within an upland area prior to entering S-MM15. Approximately 4,000 feet of the stream was impacted. At S-EF19, approximately 250 feet of the slope sloughed, overwhelmed ESC measures and impacted 50 feet of the stream. It should be noted that runoff from the permanent waterbar end treatments contributed to the erosion and sloughing. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained and enhanced, sediment removed, and the impacted areas stabilized within the required timeframes extension request approvals. The LEI submitted Agency Compliance

Forms (PARs #996, #1000, and #1007) on 7/23/2024 and 7/24/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 8/2/2024. **Refer to Section VI. for further discussion.**

On 8/13/2024, the EI observed an off right of way sediment impact approximately 30 feet within an upland area east MVP-MN-276.03. On 8/8/2024, a storm event intervals of high intensity/short duration rainfall from Tropical Storm Debby caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1026) on 8/13/2024.

On 8/30/2024, the EI observed an off right of way sediment impact approximately 50 feet within an upland area (three locations within 50 feet of each other) east MVP-MN-276.03. On 8/29/2024, a storm event with an interval of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe via an extension request approval. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1033) on 8/30/2024.

On 9/18/2024, the Assistant LEI observed an off right of sediment way impact paralleling the right of way for approximately 70 linear feet extending 10 feet off right of way within an upland area east of MVP-RO-279.01. A prolonged storm event from a tropical system occurred from 9/16/2024 through 9/18/2024 caused ESC measures to become overwhelmed. The impacted area was between the edge of the rip rap armor and the edge of right of way. The VADEQ was immediately notified, landowner access granted, ESC measures temporarily repaired, sediment removed, and the area stabilized within the required timeframe via extension request approvals. No environmental resources were impacted. A long term stabilization plan is being developed to prevent future impacts throughout this location. The LEI submitted an Agency Compliance Form (PAR #1046) on 9/48/2024. **Refer to Section VI. for further discussion.**

On 9/21/2024, the Assistant LEI observed an off right of way sediment impact that occurred approximately 1800 feet in length and a distance of approximately 600 feet from the edge of the right of way within an upland area west of MVP-RO-279.02. From 9/16/2024 through 9/18/2024, a prolonged storm event from a tropical system caused ESC and SWM measures to become overwhelmed on the slope above the AEP powerline crossing. It should be noted that this impact was not documented immediately following the rainfall event due to hazardous conditions preventing access to this area of right of way. Upon discovery of the off right of way impact, the VADEQ was immediately notified and an indefinite extension request was approved until landowner access is granted. Throughout the remainder of the week following the storm event, the contractor staff initiated repairs on the ESC and SWM measures throughout the slope. No environmental resources were impacted. An enhanced stabilization plan is being developed for this location. The LEI submitted and Agency Compliance Form (PAR#1050) on 9/21/2024. Further documentation will be provided in the Q4 2024 report.

On 9/28/2024, the Assistant LEI and EI observed three off right of way sediment impacts up to 50 feet within upland areas west of MVP-MN-278.01 (2) and east of MVP-RO-279.01 (1). On 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused severe erosion and sloughing that overwhelmed ESC and SWM measures. The VADEQ was immediately notified. Extension requests were approved until landowner access is granted at the remaining locations. A request has been submitted to the VADEQ to extend earthen waterbars across the full width of the right of way as the permanent waterbar end treatments contributed to the impacts. No environmental resources were impacted. The LEI submitted Agency Compliance Forms (PARs #11046, #1077, and #1080) on 9/30/2024. Further documentation will be provided in the Q4 2024 report.

On 9/28/2024, the EIs observed three environmental resource impacts at S-EF19 west of MVP-MN-278.01, W-IJ62 at MVP-RO-287, and W-KL1 at MVP-RO-288. The storm event from remnants of

Hurricane Helene coupled with previous rainfall and saturated conditions caused erosion/sloughing on the right of way resulting in ESC and SWM measures to become overwhelmed at S-EF19. Flooding at MVP-RO-287 and MVP-RO-288 caused gravel washout to overwhelm the ESC measures and impacting W-IJ62 and W-KL1, respectively. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, and gravel removed from W-KL1 at MVP-RO-288. Extension requests were approved until landowner access is granted at W-IJ62. Temporary ESC measures repairs/enhancements are slated to be conducted at these locations upon safe conditions. Long term enhanced ESC measures are planned for the slopes above S-EF19. The LEI submitted Agency Compliance Forms (PARs #1070, #1075, and #1076) on 9/30/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. Further documentation will be provided in the Q4 2024 report.

On 9/30/2024, the EI observed an off right of way sediment impact approximately 10 feet within an upland area east MVP-MLV-AR-28. On 9/29/2024, a storm event coupled previous rainfall and saturated conditions caused a slope to slough overwhelming the ESC measures. The VADEQ was immediately notified. Landowner access has been requested and this item has 24 Hours to be completed within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1081) on 9/30/2024.

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 the respective Bi-Weekly Reports for further discussion.**

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 EIs throughout the Q3 reporting period:

**Table H-1A**

Spread H Environmental Inspector Observations: July 1, 2024 – September 30, 2024					
Monthly Observation	Total Number Observations	Environmental Resource Impacts	Off Right of Way Impacts	Right of Way Impacts Caused by Third Parties	Weather Related Damage
July 2024	*97	8	12	0	0
August 2024	*93	0	2	0	0
September 2024	*230	3	6	5	1

\* Includes Carry Over Items

The EIs conducted a total of 224 SWPPP inspections and provided respective VSIRs throughout the Q3 reporting period. Upon review of the SWPPP VSIRs, the EIs observations were documented within the daily MVP Punchlists, communicated to the contractor, and noted issues were repaired/maintained and/or enhanced within the same day or within the VADEQ approved timeframe (24 Hours/Three Days or as extended by VADEQ authorization). It should be noted that SWPPP inspections were postponed on 8/8/2024, 9/14/2024, and 9/27/2024 due to hazardous conditions related to weather events and the VADEQ was immediately notified.

The EIs conducted ODCP site inspections at Laydown Yard PY-006 throughout the Q3 reporting period. Twenty-seven inspections were conducted in July, 29 inspections were conducted in August, and 25 inspections were conducted in September. No spills were observed during the Spread H ODCP inspections throughout the Q3 reporting period.

An approximate total of 26 recordable precipitation events occurred during the Q3 reporting period. On 7/4/2024, a strong storm event with high intensity/short duration rainfall produced approximately 1.7 inches of rainfall in two hours. This event caused ESC measures to become overwhelmed resulting in three off right of way impacts within upland areas and an environmental resource impact at S-IJ50. The

impacts were observed by the EIs on 7/5/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

On 7/4/2024, a storm event with high intensity/short duration rainfall produced approximately 1.7 inches of rainfall in two hours. This event caused ESC measures to become overwhelmed resulting an off right of way impact within an upland area that resulted in an environmental resource impact at S-MM22. The impact was observed by the EI during a SWPPP inspection on 7/9/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

On 7/18/2024, a strong storm event with high intensity/short duration rainfall produced approximately 1.1 inches of rainfall in .5 hours. This event caused erosion and a portion of a slope to slough. This impact caused ESC measures to become overwhelmed resulting in an environmental resource impact at S-IJ50. The impact was identified by the EI on 7/18/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

On 7/21/2024, strong storm events with high intensity/short duration rainfall produced approximately 0.9 inches of rainfall in one hour. This event coupled with saturated conditions caused severe erosion and sloughing. ESC and SWM measures were overwhelmed resulting in one off right of way impact within an upland area and two environmental resource impacts at S-PP23 and S-G40. The impacts were observed by the EI on 7/21/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

On 7/22/2024, a strong storm event with high intensity/short duration rainfall coupled with existing saturated condition produced approximately 1.5 inches to 1.8 inches of rainfall in 1.5 hours. This event coupled with previous storm events and saturated conditions caused severe erosion and sloughing. The ESC and SWM measures were overwhelmed resulting in 6 off right of way impacts within upland areas and three environmental resource impacts at S-G39, S-MM15, and S-EF19. The impacts were observed by the EIs on 7/23/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

On 8/8/2024, a storm event from Tropical Storm Debby with intervals of high intensity/short duration rainfall produced approximately 2 inches of rainfall in 14 hours. This event coupled with saturated conditions caused ESC measures to become overwhelmed resulting in an off right of way impact within an upland area. This impact was observed by the EI on 8/13/2024. **Refer to discussion above and Table H-1B for further discussion.**

On 8/29/2024, a storm event with an interval of high intensity/short duration rainfall produced approximately 0.5 inches of rainfall in 1.25 hours. This event caused ESC measures to become overwhelmed resulting in an off right of way impact within an upland area. The impact was observed by the EI on 8/30/2024. **Refer to discussion above and Table H-1B for further discussion.**

From 9/16/2024 through 9/18/2024, a prolonged storm event from a tropical system with intervals of high intensity/short duration rainfall produced approximately 7.0 inches in 36 hours. This event caused ESC measures to become overwhelmed. The impact was observed by the Assistant LEI on 9/18/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

From 9/16/2024 through 9/19/2024, a prolonged storm event from a tropical system with intervals of high intensity/short duration rainfall produced approximately 7.2 inches in 36 hours causing ESC measures to become overwhelmed. This event caused ESC measures to become overwhelmed resulting in an off right of way impact within an upland area. The impact was observed by the Assistant LEI on 9/21/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

On 9/27/2024, a storm event from remnants of Hurricane Helene produced approximately 3.5 inches of rainfall in 7 hours. This event coupled with previous heavy rainfall and saturated conditions caused severe erosion and sloughing throughout areas of the right of way. Erosion and Sediment Controls and SWM measures were overwhelmed subsequently resulting in three off right of way impacts within upland areas and three environmental resource impacts at S-EF19, W-IJ62, and W-KL1. The impacts were

observed by the EIs on 9/28/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

From 9-24-2024 through 9/29/2024, storm events including remnants from Hurricane Helene produced approximately 7.2 inches of rainfall causing a slope to slough. The ESC measures became overwhelmed resulting in an off right of way impact within an upland area. The VADEQ was immediately notified. Landowner access has been requested and this item has 24 Hours to be completed within the required timeframe. The impact was observed by the EI on 9/30/2024. **Refer to discussion above, Table H-1B, and Section VI. for further discussion.**

Based on precipitation 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 Precipitation and Duration Rates: July 1, 2024 – September 30, 2024					
July		August		September	
Date Recorded	Precipitation and Approximate Duration	Date Recorded	Precipitation and Approximate Duration	Date Recorded	Precipitation and Approximate Duration
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	8/3/2024	0.0"-0.6" - 2 Hours *Isolated thunderstorms occurred on 8/2/2024	9/1/2024	0.2"-2.1" - 5 Hours *Isolated thunderstorms with locations receiving high intensity/short duration rainfall occurred on 8/31/2024
7/6/2024	0.1"-1.9" - 1 Hour *Isolated moderate to heavy thunderstorms occurred on 7/5/2024	8/4/2024	0.1"-1.6" - 2.25 Hours *Scattered storm events with area of high intensity/short duration rainfall occurred on 8/3/2024	9/17/2024	0.4"-1.7" - 12 Hours *Precipitation from a tropical system with locations receiving intervals of high intensity/short duration rainfall began on late 9/16/2024
7/17/2024	0.0"-0.5" - 1 Hour *Scattered storms occurred on late 7/16/2024	8/8/2024 and 8/9/2024	2.0"-7.0" - 22 Hours *Precipitation from Tropical Storm Debby with intervals of high intensity rainfall occurred on from late 8/7/2024 through late 8/8/2024	9/18/2024	0.7"-5.5" - 24 Hours *Precipitation from a tropical system with locations receiving intervals of high intensity/short duration rainfall continued from 9/17/2024
7/18/2024	0.0"-0.4" - 1 Hour *Scattered storms occurred on late 7/17/2024	8/17/2024	0.1"-1.1" - 1.75 Hours *A storm event with locations receiving high intensity/short duration rainfall occurred on late 8/16/2024	9/19/2024	0.1"-1.7" - 6 Hours *Scattered thunderstorms occurred on late 9/18/2024
7/19/2024	0.4"-1.2" - 2 Hours *A strong thunderstorm occurred on 7/18/2024	8/30/2024	0.0"-1.5" - 4.25 Hours *Scattered storms with intervals of high intensity/short duration rainfall occurred on late 8/29/2024	9/20/2024	0.0"-1.1" - 2.25 Hours *Isolated thunderstorms with intervals of high intensity/short duration rainfall occurred on late 9/19/2024
7/21/2024	0.4"-1.1" - 2.75 Hours *Strong storm events			9/24/2024	0.0"-0.5" - 12.5 Hours *Rain showers occurred late on 9/23/2024 into early 9/24/2024
7/23/2024	0.5"-1.8" - 3.25 Hours *Strong thunderstorms occurred late on 7/22/2024			9/25/2024	0.5"-1.4" - 4 Hours *Moderate to heavy rainfall occurred on late 9/24/2024 and early morning on 9/25/2024
7/24/2024	0.1"-0.8" - 24 Hours *Scattered showers occurred on from 7/23/2024 into 7/24/2024			9/26/2024	0.7"-1.7" - 3.5 Hours *Thunderstorms occurred on late 9/25/2024 and early morning 9/26/2024
7/25/2024	0.2"-0.5" - 24 Hours *Scattered showers occurred from 7/24/2024 into 7/25/2024			9/27/2024	0.8"-2.7" - 24 Hours *Precipitation from remnants of Hurricane Helene with intervals of high intensity/short duration rainfall began early 9/26/2024 and continued into early 9/27/2024
7/30/2024	0.1"-0.4" - 6.5 Hours *Scattered showers occurred on 7/29/2024			9/28/2024	1.1"-3.5" - 7 Hours *Precipitation from remnants of Hurricane Helene with intervals of high intensity/short duration rainfall occurred on 9/27/2024
				9/30/2024	0.1"-0.6" - 2.5 Hours *Precipitation with locations receiving intervals of high intensity/short duration rainfall occurred on 9/29/2024



#### **IV. Quarterly Summary of VADEQ Observations**

Per Table H-1C, the VADEQ Inspectors observed a total of 6 items requiring ESC repair/maintenance throughout the Q3 reporting period. During the Q3 reporting period, the VADEQ did not identify project related off right of way or environmental resource impacts throughout the Spread H project area. **Refer to Table H-1C for further detailed information.**

The items provided by the VADEQ on the daily MVP Punchlists throughout the Q3 reporting period were communicated to the contractor Environmental staff and addressed within the VADEQ approved timeframe (24 hours/Three Days or as extended by VADEQ authorization).

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, 2024 – September 30, 2024					
Monthly Observation	Total Number Observations	Environmental Resource Impacts	Off Right of Way Impacts	Right of Way Impacts Caused by Third Parties	Weather Related Damage
July 2024	2	0	0	0	0
August 2024	3	0	0	0	0
September 2024	1	0	0	0	0

#### **V. Quarterly Summary of Landowner/Third Party Issues**

The Environmental Auditor noted five formal landowner/third party complaints submitted to the VADEQ for the Spread H Project during the Q3 reporting period.

- A third party complaint was observed on 7/11/2024 and filed with the VADEQ on 7/24/2024 (Pollution Investigation Report\_IR #314875). The complainant alleged "uncontrolled dust release as equipment goes up and down slope". On 7/22/2024, the Environmental Auditor conducted a site evaluation at this location and observed permanent restoration activities nearing completion on the slope west of MVP-MN-276.03. Based on communication with the LEI, the contractor was applying water to suppress dust throughout areas of the slope during the dry period. Per the Closure section of the IR on 8/2/2024, the VADEQ observed construction completed and the area permanently stabilized. No compliance issues were observed.
- A third party complaint was observed on 7/18/2024 and filed with the VADEQ on 7/23/2024 (Pollution Investigation Report\_IR #314782). The complainant alleged "muddy runoff below the MVP cut in Catawba Valley on the North Fork of the Roanoke River". On 7/16/2022, 7/22/2024, and 8/2/2024 the Environmental Auditor conducted site evaluations and observed no project related impacts at S-G36. Per the Closure section of the IR on 7/26/2024, the VADEQ inspector observed turbid conditions upstream and downstream of the MVP project due to a strong storm event late 7/22/2024. The VADEQ observed no project related impacts to S-G36 (North Fork of the Roanoke River). No compliance issues were observed.
- A third party complaint was observed and filed with the VADEQ on 7/25/2024 (Pollution Investigation Report\_IR #314813). The complainant alleged "persistent poor stream water quality" in the North Fork of the Roanoke River "one mile downstream from the MVP". On 7/16/2022, 7/22/2024, and 8/2/2024 the Environmental Auditor conducted site evaluations and observed no project related impacts at S-G36 (North Fork of the Roanoke River). Per the Closure section of the IR on 7/29/2024, the VADEQ inspector observed no project related impacts to S-G36 and no compliance issues were observed.

- A third party complaint was observed and filed with the VADEQ on 8/17/2024 (Pollution Investigation Report\_IR #315153). The complainant alleged "Mountain Valley Pipeline refueling" within a 100 ft of a wetland and sensitive area" on Yellow Finch Road (MVP-MN-278.01). It should be noted that based on FERC Procedure IV.A.1.d where a 100 feet refueling buffer is unavoidable due to site restrictions, Yellow Finch Lane was determined to be considered a special case per the EIs determination. As part of determination, special measures have been implemented by the contractor to avoid environmental resource impacts during refueling activities. The VADEQ has been aware of this condition since 2023 and allowed refueling to occur provided spill prevention measures were implemented. Per the Closure section of the IR on 8/19/2024, the VADEQ inspector observed no pollution and no compliance issues were observed.
- A third party complaint was observed on 8/26/2024 and filed with the VADEQ on 8/27/2024 (Pollution Investigation Report\_IR #315299). The complainant alleged "an unbelievable amount of dust coming off the MVP worksites". It should be noted that during the reported timeframe weather and soil conditions were extremely dry in locations where final restoration was occurring. Based on communication with the LEI, water was applied to the slope for dust suppression activities throughout the dry period. A storm event with high intensity/short duration rainfall occurred across the spread on 8/31/2024 which provided additional dust suppression. Per the Closure section of the IR on 9/4/2024, the VADEQ concluded no compliance issues were observed.

#### **VI. Quarterly Summary of Environmental Auditor Observations and Recommendations**

Per Table H-1D, the Environmental Auditor conducted 65 site evaluations during the Q3 reporting period and observed locations where Pollution Prevention, ESC, and SWM measures required proper installation, repair/maintenance, or additional (enhanced) measures to be installed.

During the reporting period, the Environmental Auditor evaluated the ESC, SWM, and Pollution Prevention measures throughout the project for proper installation and functionality. The Environmental Auditor also reviewed and provided recommendations related to daily MVP Punchlists, ODCP Inspection reports, and SWPPP VSIRs. The Environmental Auditor communicated technical and administrative observations and recommendations to the LEI, Assistant LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff. Installation and repair/maintenance recommendations were forwarded to the contractor Environmental staff by the Spread H Environmental inspection staff and most recommendations were subsequently addressed.

During the Q3 reporting period, the Environmental Auditor evaluated locations throughout the right of way where final cleanup and permanent restoration activities were occurring. The Environmental Auditor focused on proper installation of the SWM measures (right of way and access roads) and site restoration implementation. The Environmental Auditor also conducted evaluations at locations where off right of way and environmental resource impacts occurred throughout the Q3 reporting period. The Environmental Auditor communicated/coordinated with the onsite EIs and LEI on a continued basis to ensure permanent restoration activities were conducted in accordance with the required ESC/SWM Plans and AS&S requirements. The Environmental Auditor frequently communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to conducting proper hydraulic application operations to achieve uniform coverage at the required rates, properly installing soil stabilization blanket (SSB), and recognizing locations where concentrated flow resulted in erosive conditions and implemented enhanced ESC measures at such locations. The Environmental Auditor also communicated with the LEI regarding relevant documentation related to SWPPP VSIRs, daily MVP Punchlists, ODCP Inspection reports, and Agency Compliance Forms (PARs).

The Environmental Auditor provided the following detailed technical and administrative/documentation recommendations:

### **Technical Recommendations**

- Repair rills/gullies prior to conducting stabilization activities.
- Ongoing communication to install SSB where straw/hydraulic mulch are not effective measures per Section 3.2 of the AS&S requirements. Areas of concern where concentrated runoff has caused erosion are along the inside edge of perimeter sediment controls on slopes, below waterbar end treatments, areas where rills/gullies have formed, and areas where sheet flow transitioned to concentrated flow conditions.
- Upgrading SSB throughout locations where current SSB is an ineffective measure per Section 3.2 of the AS&S due to slope, concentrated flow conditions, and limited functional longevity.
- Ongoing communication to properly install SSB related to anchoring and stapling.
- Evaluate and repair compost filter sock (CFS) where undermining was observed.
- Install SSB and check dams along the inside edge of perimeter sediment controls on slopes where concentrated runoff was observed creating erosive conditions.
- Proper SSB installation related to ensuring the blanket has uniform contact with the ground surface.
- Monitor temporary bridge crossings during active construction activities and enhance ESC measures as necessary.
- Evaluate vegetative growth throughout the right of way and restabilize locations where there is currently minimal to no vegetative growth. The stabilization process should entail the addition of lime and fertilizer as necessary. The Environmental Auditor also suggested to the LEI, Chief EI, and MVP Environmental staff to consider additional soil amendments to provide sustainable soil fertility. Soil fertility and pH testing is recommended to determine appropriate application rates.

### **Administrative/Documentation Recommendations**

- Conduct QA/QC to ensure consistency and thoroughness between the daily MVP Punchlists and SWPPP VSIRs. This includes SWPPP VSIR documentation not reflecting actual site conditions at the time of the SWPPP inspection related to items that have not been completed in entirety. The Environmental Auditor recommended reopening the items and ensuring future daily MVP Punchlists include separate corrective action items for temporary ESC measures, long term repairs via extension requests, and off right of way/environmental resource impacts. Following identification of these concerns, corrective actions were undertaken by the Spread H Environmental inspection staff.
- Update the off right of way Sediment Tracker data and submit Agency Compliance Forms to the Environmental Auditor following an off right of way/environmental resource impact.
- Communicate third party/landowner complaints, off right of way impacts, and environmental resource impacts to the Environmental Auditor.

The following are Environmental Auditor observations at locations where off right of way and environmental resource impacts occurred throughout the Q3 reporting period. **Refer to the attached Environmental Auditor Bi-Weekly Reports for further information.**

On 7/9/2024, the Environmental Auditor conducted an evaluation on the slope east MVP-RO-279.01 where the EI observed an off right of way impact resulting in an environmental resource impact at S-IJ50 on 7/5/2024. The Environmental Auditor observed the contractor staff conducting maintenance and initiating sediment removal from the off right of way and S-IJ50 impacts. The ESC measures appeared to be repaired and enhanced. The Environmental Auditor conducted a follow up evaluation on 8/6/2024 where another environmental resource impact at S-IJ50 was observed by the EI on 7/18/2024. The Environmental Auditor observed temporary waterbars placed across the slope and the contractor staff conducting ESC and SWM measures repair/maintenance activities at the time of the evaluation. Based on the evaluation, it appeared that the permanent waterbar end treatments directed a large volume of

runoff down the center of the slope which contributed to the impact. Based on communication with the Spread H LEI and MVP Environmental staff, an engineering review was underway to implement enhanced long term stabilization measures on the slope. On 9/18/2024, the Environmental Auditor conducted a follow up evaluation on the slope above S-IJ50 where an off right of way impact within an upland area was observed by the EI on the same day. The Environmental Auditor observed rip rap revetment installed throughout a portion of the slope above S-IJ50. However, it appeared that runoff concentrated between the edge of the rip rap and the edge of the right of way caused severe erosion and damage to the ESC measures. The contractor staff was initiating ESC measure repairs and off right of way sediment removal at the time of the evaluation. Based on communication with the LEI, a long term stabilization plan is being developed to install enhanced ESC measures within the impacted area.

On 7/9/2024, the Environmental Auditor conducted an evaluation MVP-RO-281 where an off right of way gravel impact was observed by the EI on 7/5/2024. The access road was repaired and the ESC measures repaired and enhanced. The off right of way gravel was not removed and an indefinite extension request was approved by the VADEQ until landowner permission is granted. The extension request remains open as landowner permission has not been granted.

On 7/9/2024, the Environmental Auditor evaluated a location and west of MVP-RO-282 where the EI observed off right of way impacts on 7/5/2024. At the time of the evaluation, final grading and permanent restoration activities were occurring and the ESC measures appeared to be installed and functional. The off right of way sediment was not removed and an indefinite extension request was approved by the VADEQ until landowner permission is granted. On 8/6/2024 and 9/6/2024, the Environmental Auditor conducted a follow up evaluation where a reoccurring impact was observed by the EI on 7/23/2024. Based on the evaluation, it appeared that runoff from the permanent waterbar end treatments contributed to the impacts. The ESC measures were repaired/maintained; however, the Environmental Auditor observed erosion beneath the SSB. A recommendation was provided to install enhanced SSB due to concentrated flow conditions and ensuring it is properly anchored to minimize undermining. The minor off right of way sediment was not removed and an indefinite extension request was approved by the VADEQ until landowner permission is granted. The Environmental Auditor conducted an evaluation on 9/17/2024 and observed enhanced SSB installed.

On 7/22/2024, the Environmental Auditor conducted an evaluation east of MVP-MN-268.01 where the EI observed an off right of way impact resulting in environmental resource impacts at S-PP23 and S-G40 on 7/21/2024. At the time of the evaluation, the contractor staff was conducting sediment removal from streams S-PP23 and S-G40. The Environmental Auditor observed ESC and SWM measures damaged for approximately 500 feet within the right of way. The Environmental Auditor observed sediment at S-G40 extending approximately 2,000 feet downstream of the right of way. No off right of way sediment was removed at the time of the evaluation due to the hazardous/wet conditions throughout the right of way. Based on the evaluation, it appeared that runoff from the permanent waterbar end treatments contributed to the impacts. It should be noted that the Environmental Auditor evaluated this area on 7/16/2024 and observed the ESC and SWM measures installed and functional. On 8/2/2024, the Environmental Auditor conducted a follow up evaluation. On the slope east of S-PP23, it appeared that off right of way sediment was removed, the areas stabilized, and repairs conducted to the ESC and SWM measures. A temporary travel lane was constructed on the slope east of S-PP23 and temporary bridge crossings were reinstalled across S-PP23 and S-G40 to conduct the upslope repair/maintenance activities. Based on an evaluation at S-PP23, the Environmental Auditor observed two locations where additional sediment removal was necessary and discussed this issue with the onsite EI. On 8/27/2024, the Environmental Auditor conducted a follow up evaluation and observed the ESC and SWM measures installed and functional and the minor sediment deposits observed by the Environmental Auditor on 8/2/2024 removed from S-PP23. It should be noted that in response to the third party complaints filed with the VADEQ on 7/23/2024 and 7/25/2024, the Environmental Auditor also evaluated S-G36 (North Fork Roanoke River) on 7/22/2024 and 8/2/2024 following the high intensity/short duration storm events. At the time of the evaluations the Environmental Auditor observed the no project related impacts immediately downstream of the project area.

On 8/2/2024, the Environmental Auditor conducted site evaluations at MVP-MN-268.01 (GAS) where the EI observed an off right of way impact resulting in an environmental resource impact at S-G39 on 7/23/2024. Based on the evaluation, it appeared that concentrated runoff from the permanent waterbar end treatments caused erosion to overwhelm the ESC/SWM measures resulting in the off right of way and environmental resource impacts. At the time of the evaluation, it appeared that the sediment was removed from the stream. Temporary ESC measures and permanent SWM measures repairs were underway on the slope west of S-G39. The off right of way area impacted by the storm event had upslope sediment control measures installed; however, the Environmental Auditor recommended implementing erosion control measures on the slope and installing additional sediment control measures at the toe of the slope immediately above S-G39 to avoid potential future impacts. The Environmental Auditor also communicated concerns to the Spread H Environmental inspection staff, Chief EI, and MVP Environmental staff regarding concerns related to closing out daily MVP Punchlist items where final repairs/maintenance activities have not been completed. On 8/27/2024, the Environmental Auditor conducted a follow up evaluation

On 8/2/2024, the Environmental Auditor evaluated the right of way west and east of MVP-MN-270 where off right of way impacts and an environmental resource impact at S-MM15 were observed by the EI on 7/23/2024. Based on the evaluation, it appeared that concentrated runoff from the permanent waterbar end treatments caused erosion to overwhelm the ESC and SWM measures resulting in the off right of way and environmental resource impacts. It appeared that repairs had been initiated on the upslope permanent waterbars and end treatments; however, the erosion was not repaired along the east edge of the right of way at the time of the evaluation. Recommendations were provided to install temporary ESC measures until conditions improved to avoid potential future impacts. Sediment removal was initiated within the right of way portion of S-MM15 and the overall impacted stream area extended to the MVP-MN-270 access road crossing approximately 4,000 feet below the right of way. On 8/27/2024, the Environmental Auditor conducted a follow up evaluation from the S-MM15 stream crossing at the access road up to the right of way and observed the sediment removed and impacted areas stabilized. The Environmental Auditor evaluated the right of way and observed the ESC and SWM measures installed and functional, off right of way sediment removed, and the areas stabilized.

The Spread H Environmental inspection staff, Chief EI, and Environmental Auditor continue to monitor locations throughout the right of way and communicate/coordinate to repair/maintain and implement additional (enhanced) ESC and SWM measures as necessary. The Environmental Auditor continues to communicate with the LEI, Assistant LEI, EC, Chief EI, onsite EIs, and MVP Environmental staff on a regular basis. Discussions entail project feedback, technical support, and recommendations/guidance to maintain compliance with the ESC/SWM Plans, SWPPP VSIRs, ODCP Inspection reports, and the AS&S. It should be noted that the Environmental Auditor will be conducting evaluations at locations where off right of way and environmental resource impacts occurred on 9/28/2024 and 9/29/2024 and providing documentation in the Q4 2024 report.

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

**Table H-1D**

Environmental Auditor Field Observations: July 1, 2024 – September 30, 2024	
Month	Total Observations
July 2024	13
August 2024	23
September 2024	29

## **VII. Conclusion(s)**

Per Section IV. (b) (1) of the Consent Decree, the Environmental Auditor conducted site evaluations, evaluated daily MVP Punchlists, ODCP Inspection reports, SWPPP VSIRs, 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; 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 contractor Environmental staff) 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 Spread H Environmental inspection staff and the contractor Environmental staff to ensure all ESC measures are properly installed/functional and enhanced where necessary to maintain compliance with the approved ESC Plans and Annual Standards and Specifications.

As the VADEQ is aware, there are instances noted in the Q4 2019 through Q2 2024 Reports in which sediment has left the ROW but MVP's requests for landowner permission to take corrective measures have been denied. Therefore, 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.

MOUNTAIN VALLEY PIPELINE  
SPREAD H  
ENVIRONMENTAL AUDITOR PARTIAL BI-WEEKLY REPORT - 6/30/2024 through 7/7/2024 (BEGINNING OF Q3 2024 REPORTING PERIOD)

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 7/7/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>14</b> conducted from 7/1/2024 through 7/7/2024 (includes PY-006): <b>Holiday on 7/4/2024</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/1/2024 through 7/7/2024 (includes Carry Over Items from 6/30/2024): <b>19</b>											
Total Number of ODCP Inspections at Laydown Yard PY-006: <b>5</b> (7/1/2024 through 7/3/2024 and 7/5/2024 through 7/6/2024): <b>Holiday on 7/4/2024</b>											
Total Number of VA DEQ Observations from 7/1/2024 through 7/7/2024: <b>0</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>3</b> ( <b>1</b> . On 7/5/2024, the EI observed an off right of way gravel impact within an upland area at MVP-RO-281 (access road). On 7/4/2024, a storm event with high intensity/short duration rainfall produced approximately 1.7 inches of rainfall in two hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified and the ESC measures repaired/maintained. An indefinite extension request has been approved by the VADEQ until landowner permission is granted to conduct sediment removal and stabilization. No environmental resources were impacted. <b>2-3</b> . On 7/5/2024, the EI observed two off right of way impacts within upland areas west MVP-RO-282 as a result of a storm event with high intensity/short duration rainfall that occurred on late 7/4/2024. The storm event produced approximately 1.7 inches of rainfall in two hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified and the ESC measures repaired/maintained. An indefinite extension request has been approved by the VADEQ until landowner permission is granted to conduct sediment removal and stabilization. No environmental resources were impacted). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>1</b> (On 7/5/2024, the EI identified an environmental resource impact at S-IJ50 east of MVP-RO-279.01. On 7/4/2024, a storm event with high intensity/short duration rainfall produced approximately 1.7 inches of rainfall in two hours causing approximately 1,000 feet of erosion and sloughing within the temporary easement of a permanently restored slope. This event overwhelmed the ESC measures subsequently impacting approximately 400 feet of S-IJ50. The VADEQ was immediately notified and temporary ESC measures were installed on the slope. An indefinite extension request was approved by the VADEQ until landowner access is granted to conduct sediment/debris removal from the stream. Upon completion, the impacted portion of the right of way will be permanently restored. The MVP Environmental staff is preparing a Courtesy Force Majeure Declaration due to the magnitude of the storm event). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
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: <b>0</b>											
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 7/1/2024 through 7/7/2024.											
CARRY OVER ITEMS FROM 6/30/2024											
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	<b>2020</b> 1 on 11/12, 11/18, 11/25, 12/9, 12/17, 12/23, and 12/30/2020 <b>2021</b> 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, 6/16, 7/15, 8/16, 9/16, 10/16, 11/16, and 12/16/2021 <b>2022</b> 1/17, 2/17, 3/17, 4/15, 5/16, 6/15, 7/15, 8/15, 9/16, 10/14, 11/15, and 12/15/2022 <b>2023</b> 1/16, 2/16, 3/15, 4/14, 5/15, 6/15, 7/14, 8/15, 9/16, 10/17, 11/17, and 12/16/2023 <b>2024</b> 1/17, 2/17, 3/16, 4/16, 5/17, and 6/17 to be completed on 7/17/2024		7/2/2024	The slip area west of Flanders Road has been stable since previous repairs were conducted and no issues have occurred over the past four years. This item has been closed via approval by the VADEQ.
4/12/2024	0.5"-2.6" - 18 Hours *Intermittent light rainfall followed by high intensity/short duration storm events occurred on 4/11/2024	1		1			1	1 on 4/13/2024 (24 Hours) extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/8/2024		1		1			1	1 on 5/9/2024 (24 Hours) extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/15/2024	0.8"-1.3" - 16 Hours *Precipitation with periods of high intensity/short duration rainfall occurred on 5/14/2024 into early morning 5/15/2024	3		3			3	3 on 5/16/2024 (24 Hours) extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is 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
7/1/2024		1					1			1 on 7/2/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	12	1	3			12 (includes off right of way impacts and environmental resource impact)	4 on 7/6/2024 (environmental resource and off right of way impacts) extended indefinitely until landowner permission is granted	1 on 7/6/2024	1 on 7/5/2024 6 on 7/6/2024	Twelve items were identified requiring ESC/SWM repair/maintenance and 8 were completed within the required timeframe. Three items were identified as off right of way impacts approximately 5 feet at MVP-RO-281 (access road) and approximately 20 and 50 feet west of MVP-RO-282. On late 7/4/2024, a storm event with high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified and the ESC measures repaired/maintained. Extension requests were approved by the VADEQ until land owner access is granted. No environmental resources were impacted. The LEI submitted Agency Compliance Forms (Problem Area Reports #954 and #955) on 7/5/2024. The Environmental Auditor will initiate site evaluations the week of 7/8/2024.  One item was identified as an environmental resource impact at S-IJ50 east of MVP-RO-279.01. On late 7/4/2024, a storm event with high intensity/short duration rainfall caused approximately 1,000 feet of erosion and sloughing within the temporary easement of a permanently restored slope, overwhelmed the ESC measures, and subsequently impacting approximately 400 feet of S-IJ50 east of MVP-RO-279.01. The VADEQ was immediately notified and temporary ESC measures were installed on the slope. An indefinite extension request was approved by the VADEQ until landowner access is granted to conduct sediment/debris removal from the stream. Upon completion, the impacted portion of the right of way will be permanently restored. The LEI submitted an Agency Compliance Form (Problem Area Report #953) on 7/5/2024. The MVP Environmental staff is preparing a Courtesy Force Majeure Declaration due to the magnitude of the storm event. The Environmental Auditor will conduct a site evaluation the week of 7/8/2024.
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
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			
7/1/2024 through 7/7/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread H Project.  The Environmental Auditor communicated with all Spread LEIs on 7/2/2024 regarding the Partial Bi-Weekly reporting period ending on 7/7/2024.							The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and conducting enhancements as needed throughout the Spread H project. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector (LEI), Assistant LEI, and Environmental Coordinator, 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										



MOUNTAIN VALLEY PIPELINE  
SPREAD H  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 7/8/2024 through 7/21/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 7/21/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>34</b> conducted from 7/8/2024 through 7/21/2024 (includes PY-006)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/8/2024 through 7/21/2024 (includes Carry Over Items from 7/7/2024): <b>40</b>											
Total Number of ODCP Inspections at Laydown Yard PY-006: <b>6</b> (7/8/2024 through 7/13/2024); <b>6</b> (7/15/2024 through 7/20/2024)											
Total Number of VA DEQ Observations from 7/8/2024 through 7/21/2024: <b>1</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>3</b> (1. On 7/9/2024, the EI was conducting a SWPPP inspection and observed an off right of way sediment impact east of MVP-MN-278.01. On 7/4/2024, a strong storm event with high intensity/short duration storm event produced approximately 1.7 inches of rainfall in two hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. This impact resulted in an environmental resource impact at S-MM22. 2. On 7/15/2024, the Assistant EI observed an off right of way impact within an upland area east of MVP-MN-278.01. Due to extremely dry conditions, a slough occurred on the slope subsequently overwhelming the ESC measures. The VADEQ was immediately notified and the ESC measures were enhanced to minimize potential future impacts. An indefinite extension request was approved by the VADEQ until landowner access is granted. 3. On 7/21/2024 following a strong storm event, the EI observed an off right of way impact east of MVP-MN-268.01. On the same day, strong storm events coupled with existing saturated conditions caused a slope to slough overwhelming the ESC measures. The VADEQ was immediately notified. It should be noted that this impact resulted in environmental resource impacts at S-PP23 and S-G40. The impacted area has 24 Hours to be completed within the required timeframe). Refer to Environmental Inspector Observations for further discussion.											
Total Number of Environmental Resource Impacts: <b>4</b> (1. On 7/9/2024, the EI was conducting a SWPPP inspection and observed an environmental resource impact at S-MM22 east of MVP-MN-278.01. On 7/4/2024, a strong storm event with high intensity/short duration rainfall produced approximately 1.7 inches of rainfall in two hours causing upslope ESC measures to become overwhelmed, resulting in an off right of way impact, and subsequently impacting approximately 250 feet of S-MM22. The VADEQ was immediately notified, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approved by the VADEQ. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 7/10/2024 and a Final Notice of Force Majeure Declaration on 7/15/2024. 2. On 7/18/2024, the EI observed an environmental resource impact at S-IJ50 east of MVP-RO-279.01. On 7/18/2024, a strong storm event with high intensity/short duration rainfall produced approximately 1.1 inches of rainfall in .5 hours. This event caused approximately 1,000 feet of a slope to slough overwhelming ESC measures and subsequently impacting approximately 500 feet of S-IJ50. It should be noted that this exact location was impacted by a strong storm event on 7/4/2024. The VADEQ was immediately notified and temporary ESC measures installed. An indefinite extension request was approved by the VADEQ until landowner access is granted. A Courtesy Notice of Force Majeure Declaration is being prepared by the MVP Environmental staff. 3-4. On 7/21/2024, the EI observed environmental resource impacts at S-PP23 and S-G40 east of MVP-MN-268.01. On the same day, strong storms with high intensity/short duration rainfall produced approximately 0.9 inches of rainfall in one hour. This event coupled with existing saturated conditions caused a slope to fail east of the streams. The impact extended approximately 2,000 feet downstream at S-G40. These impacts have 24 Hours to be completed within the required timeframe. A Courtesy Notice of Force Majeure Declaration is being prepared by the MVP Environmental staff). Refer to Environmental Inspector Observations 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: <b>0</b>											
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 7/8/2024 through 7/21/2024.											
CARRY OVER ITEMS FROM 7/7/2024											
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
4/12/2024	0.5"-2.6" - 18 Hours *Intermittent light rainfall followed by high intensity/short duration storm events occurred on 4/11/2024	1		1			1	1 on 4/13/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/8/2024		1		1			1	1 on 5/9/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted. Currently, landowner permission has been denied.
5/15/2024	0.8"-1.3" - 16 Hours *Precipitation with periods of high intensity/short duration rainfall occurred on 5/14/2024 into early morning 5/15/2024	3		3			3	3 on 5/16/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	4	1	3			4	4 on 7/6/2024 extended indefinitely to be completed upon landowner permission	1 on 7/13/2024 (environmental resource impact)		Three items were identified as off right of way impacts within upland areas and one item was identified as an environmental resource impact at S-IJ50. On late 7/4/2024, a storm event with high intensity/short duration rainfall caused a slope to slough overwhelming ESC measures and subsequently impacting the stream. The environmental resource impact was completed within the required timeframe via an extension request approval. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 7/10/2024 and a Final Notice of Force Majeure Declaration on 7/15/2024. The same storm event caused ESC measures to become overwhelmed resulting in gravel/sediment impacts within three upland locations at the MVP-RO-281 access road and west of MVP-RO-282. The ESC measures were immediately repaired/enhanced per the Bi-Weekly Report ending on 7/7/2024. However, these items received indefinite extension requests approved by the VADEQ until landowner access is granted. The remaining three items received an indefinite extension request approval until landowner access is 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
7/9/2024		9	1	1			5	1 on 7/10/2024 extended indefinitely upon landowner permission	1 on 7/10/2024 1 on 7/12/2024 (extension requests)	1 on 7/10/2024 6 on 7/12/2024	Nine items were identified requiring ESC repair/maintenance and completed within the required timeframe. One item was identified as an off right of way sediment impact paralleling the right of way for approximately 900 feet extending to 30 feet off right of way within an upland area east of MVP-MN-278.01. This event subsequently impacted approximately 250 feet of S-MM22 east of MVP-MN-278.01. On 7/4/2024, a strong storm event with high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed and the impacted areas stabilized within the required timeframe via an extension request approval. The LEI submitted an Agency Compliance Form (Problem Area Report #975) on 7/9/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 7/10/2024 and a Final Notice of Force Majeure Declaration on 7/15/2024.
7/10/2024		4					4			1 on 7/10/2024 1 on 7/11/2024 2 on 7/12/2024	Four items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.



MOUNTAIN VALLEY PIPELINE  
SPREAD H  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 7/22/2024 through 8/4/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 8/4/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>36</b> conducted from 7/22/2024 through 8/4/2024 (includes PY-006); <b>Refer to Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/22/2024 through 8/4/2024 (includes Carry Over Items from 7/21/2024): <b>59</b>											
Total Number of ODCP Inspections at Laydown Yard PY-006: <b>7</b> (7/22/2024 through 7/28/2024); <b>7</b> (7/29/2024 through 8/4/2024)											
Total Number of VA DEQ Observations from 7/22/2024 through 8/4/2024: <b>1</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>3</b> ( <b>1</b> . A third party complaint was observed on 7/11/2024 and filed with the VADEQ on 7/24/2024 (Pollution Investigation Report_IR #314875). The complainant alleged "uncontrolled dust release as equipment goes up and down slope". On 7/22/2024, the Environmental Auditor conducted a site evaluation at this location and observed permanent restoration activities nearing completion on the slope west of MVP-MN-276.03. Based on communication with the LEI, the contractor was applying water to suppress dust throughout areas of the slope during the dry period. Per the Closure Section of the IR on 8/2/2024, no compliance issues were observed. <b>2</b> . A third party complaint was observed on 7/18/2024 and filed with the VADEQ on 7/23/2024 (Pollution Investigation Report_IR #314782). The complainant alleged "muddy runoff below the MVP cut in Catawba Valley on the North Fork of the Roanoke River". Per the Closure section of the IR on 7/26/2024, no compliance issues were observed. <b>3</b> . A third party complaint was observed and filed with the VADEQ on 7/25/2024 (Pollution Investigation Report_IR #314813). The complainant alleged "persistent poor stream water quality" in the North Fork of the Roanoke River "one mile downstream from the MVP". Per the Closure section of the IR on 7/29/2024, no compliance issues were observed). <b>Refer to Landowner/Third Party Related Complaints for further discussion.</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>6</b> ( <b>1-6</b> . On 7/23/2024, the EIs observed 6 off right of way impacts west of MVP-RO-282, northwest of MVP-MN270, east of MVP-MN-268.01, east of MVP-MN-276.03, east and west of MVP-MN-278.01 ( <b>2</b> ). On 7/22/2024, a strong storm event with high intensity/short duration rainfall coupled with existing saturated condition produced approximately 1.5 inches to 1.8 inches of rainfall in 1.5 hours causing ESC and SWM measures to become overwhelmed. It should be noted that in most locations, runoff from the permanent waterbar end treatments contributed to the impacts. The VADEQ was immediately notified, landowner access granted at four locations, most ESC and SWM measures repaired/enhanced in entirety, sediment removed, and the areas stabilized within the required timeframe via extension request approvals. The remaining two locations were granted indefinite extensions until landowner access is granted. No environmental resource impacts occurred from four of the off right of way impacts. <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>3</b> ( <b>1-3</b> . On 7/23/2024, the EIs observed environmental resource impacts at S-G39 east of MVP-MN-268.01, S-MM15 east of MVP-MN-270, and S-EF19 west of MVP-MN-278.01. On 7/22/2024, a strong storm event with high intensity/short duration rainfall coupled with existing saturated conditions produced approximately 1.5 inches to 1.8 inches of rainfall in 1.5 hours causing ESC measures to become overwhelmed. It should be noted that in most locations, runoff from the permanent waterbar end treatments contributed to the impacts. The VADEQ was immediately notified, landowner access granted at two locations, ESC measures repaired/enhanced, sediment removed, and the areas stabilized within the required timeframe via extension request approvals. The remaining one location at S-MM15 has been granted an indefinite extension until landowner access is granted. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration and Final Notice of Force Majeure Declaration on 7/28/2024 and 8/2/2024, respectively). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
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: <b>0</b>											
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 7/22/2024 through 8/4/2024 .											
CARRY OVER ITEMS FROM 7/21/2024											
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
4/12/2024	0.5"-2.6" - 18 Hours *Intermittent light rainfall followed by high intensity/short duration storm events occurred on 4/11/2024	1		1			1	1 on 4/13/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/8/2024		1		1			1	1 on 5/9/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted. Currently, landowner permission has been denied.
5/15/2024	0.8"-1.3" - 16 Hours *Precipitation with periods of high intensity/short duration rainfall occurred on 5/14/2024 into early morning 5/15/2024	3		3			3	3 on 5/16/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	3		3			3 (off right of way impacts)	3 on 7/6/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/15/2024		1		1			1	1 on 7/16/2024 extended indefinitely upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
7/18/2024	0.0"-0.4" - 1 Hour *Scattered storms occurred on late 7/17/2024 and 0.4"-1.2" - 2 Hours *A strong thunderstorm occurred on 7/18/2024	1	1				1	1 on 7/19/2024 extended indefinitely upon landowner permission			The EI identified an environmental resource impact at S-IJ50 east of MVP-RO-279.01. Per the Environmental Auditor's Partial Bi-Weekly Report ending on 7/7/2024, this is the same location where impacts occurred from the 7/4/2024 storm event. On 7/18/2024, the contractor staff was completing ESC/SWM repairs on the right of way due to the 7/4/2024 storm event. On 7/18/2024, a strong storm event with high intensity/short duration rainfall caused the right of way to slough, overwhelming the ESC measures, and subsequently impacting approximately 500 feet of the S-IJ50 channel. The VADEQ was immediately notified and temporary ESC measures installed. An indefinite extension request was approved by the VADEQ until landowner access is granted. It should be noted that the Spread H Environmental inspection staff and MVP Environmental staff are coordinating to implement enhanced repair measures to minimize potential future impacts. The LEI submitted a revised Agency Compliance Form (Problem Area Report #953) on 7/25/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 7/23/2024 and a Final Notice of Force Majeure Declaration on 7/28/2024, respectively.
7/19/2024	0.4"-1.2" - 2 Hours *A strong thunderstorm occurred on 7/18/2024	1					1	1 on 7/22 and 7/25/2024 to be completed on 7/28/2024 due to wet conditions		1 on 7/28/2024	One item was identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.

7/21/2024	0.4"-1.1" - 2.75 Hours *Strong storm events	5	2	1			5 (includes off right of way and environmental resources impacts)	1 on 7/22, 7/23, 7/24, and 7/25 to be completed on 7/26/2024 due to wet conditions  1 on 7/22, 7/23, 7/24, 7/25, and 7/26/2024 to be completed on 8/2/2024 due to wet conditions  3 on 7/24/2024 to be completed on 7/27/2024 due to wet conditions	1 on 7/26/2024 1 on 7/28/2024	3 on 7/26/2024	Five items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe via extension request approvals. One item was identified as an off right of way sediment impact approximately 1500 feet within an upland area subsequently resulting in two environmental resource impacts at S-PP23 and S-G40 east of MVP-MN-268.01. On 7/21/2024, strong storm events coupled with existing saturated ground conditions caused the slope to fail, overwhelming ESC measures, resulting in the off right of way approximately 150 feet to a natural drainage feature. The sediment traveled approximately 1500 feet subsequently impacting S-PP23 and S-G40. Approximately 2,000 feet of sediment impacted S-G40. Based on the site evaluation conducted by the Environmental Auditor, it appears that concentrated runoff from the permanent waterbar end treatments contributed to the impacts. The VADEQ was immediately notified, landowner access granted, ESC/SWM measures repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframes via extension request approvals. The LEI submitted an Agency Compliance Form (Problem Area Report #984) on 7/21/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 7/23/2024 and a Final Notice of Force Majeure Declaration on 7/28/2024, respectively.
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
7/22/2024		5					5			4 on 7/23/2024 1 on 7/24/2024	Five items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
7/23/2024	0.5"-1.8" - 3.25 Hours *Strong thunderstorms occurred late on 7/22/2024	24	3	6			24	7 on 7/24/2024 (extended indefinitely upon landowner permission)	2 on 7/23/2024 1 on 7/24/2024 1 on 7/25/2024 (extension request) 1 on 7/26/2024 (extension request) 1 on 7/28/2024 (extension request) 1 on 7/30/2024 (extension request)	3 on 7/23/2024 3 on 7/24/2024 2 on 7/25/2024 6 on 7/26/2024	Twenty-four items were identified requiring ESC and SWM repair/maintenance and 21 were completed within the required timeframe. It should be noted that two of these items required additional ESC measures. Six items were identified as off right of way impacts ranging approximately two feet to 400 feet within upland areas west of MVP-RO-282, northwest of MVP-MN270, east of MVP-MN-268.01 , east of MVP-MN-276.03, east of MVP-MN-278.01, and west of MVP-MN-278.01. Two of the off right of way impacts resulted in environmental resource impacts at S-G39 and S-MM15. On 7/22/2024 and 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. It should be noted that runoff from the permanent waterbar end treatments contributed to the erosion and subsequent off right of way impacts. The VADEQ was immediately notified, landowner access granted at four locations, ESC measures repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframe. Erosion and Sediment Control measures have been installed at the two locations where landowner permission has not been granted and extension requests were approved by the VADEQ. It should be noted that two incident locations resulted in environmental resource impacts at S-G39 and S-MM15. The LEI submitted Agency Compliance Forms (Problem Area Report #996, #1000, and #1007) on 7/23/2024 and 7/24/2024.  Three items were identified as environmental resource impacts at S-G39 east of MVP-MN-268.01, S-MM15 east of MVP-MN-270, and S-EF19 west of MVP-MN-278.01. On 7/22/2024 and 7/23/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. It should be noted that runoff from the permanent waterbar end treatments contributed to the erosion and subsequent off right of way impacts. At S-G39, erosion caused sloughing on the above slope impacting approximately 50 feet off right of way subsequently impacting the stream. The VADEQ was immediately notified, landowner access granted, most ESC measures were repaired/enhanced, and sediment removed from the stream channel. At S-MM15, significant erosion occurred along the edge of the right of way impacted approximately 400 feet off right of way subsequently impacting approximately 4,000 feet of the stream. The VADEQ was immediately notified and most ESC measures were repaired/enhanced. Landowner permission was requested and an indefinite extension request was approved by the VADEQ. At S-EF19, approximately 250 feet of the slope sloughed, overwhelmed the ESC measures and impacted 50 feet of the stream. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the impacted areas stabilized within the required timeframe via an extension request approval. The LEI submitted Agency Compliance Forms (Problem Area Reports #996, #1000, and #1007) on 7/23/2024 and 7/24/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration and Final Notice of Force Majeure Declaration on 7/28/2024 and 8/2/2024, respectively.  <b>Three items remain open until landowner access is granted.</b>
7/24/2024	0.1"-0.8" - 24 Hours *Scattered showers occurred on from 7/23/2024 into 7/24/2024	3					3			2 on 7/25/2024 1 on 7/27/2024	Three items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
7/25/2024	0.2"-0.5" - 24 Hours *Scattered showers occurred from 7/24/2024 into 7/25/2024	2					2			2 on 7/26/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
7/29/2024		3					3			2 on 7/30/2024 1 on 7/31/2024	Three items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
7/31/2024		1					1		1 on 7/31/2024		One identified requiring ESC repair/maintenance and completed within the required timeframe.
8/1/2024		1					1			1 on 8/2/2024	One identified requiring ESC repair/maintenance and completed within the required timeframe.
8/4/2024	0.1"-1.6" - 2.25 Hours *Scattered storm events with area of high intensity/short duration rainfall occurred on 8/3/2024	4					4				<b>Four items were identified requiring ESC and SWM repair/maintenance and have three days to be completed within the required timeframe.</b>
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
7/23/2024	0.5"-1.4" - 3.25 Hours *Strong thunderstorms occurred late on 7/22/2024	1				1			1 on 7/24/2024		One item was identified requiring ESC 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
7/11/2024 (received by VADEQ on 7/24/2024)	MVP-MN-276.03	1	A third party complaint was observed on 7/11/2024 and filed with the VADEQ on 7/24/2024 (Pollution Investigation Report_IR #314875). The complainant alleged "uncontrolled dust release as equipment goes up and down slope". On 7/22/2024, the Environmental Auditor conducted a site evaluation at this location and observed permanent restoration activities nearing completion on the slope west of MVP-MN-276.03. Based on communication with the LEI, the contractor was applying water to suppress dust throughout areas of the slope during the dry period. Per the Closure Section of the IR on 8/2/2024, no compliance issues were observed.
7/18/2024 (received by VADEQ on 7/23/2024)	Catawba Road	1	A third party complaint was observed on 7/18/2024 and filed with the VADEQ on 7/23/2024 (Pollution Investigation Report_IR #314782). The complainant alleged "muddy runoff below the MVP cut in Catawba Valley on the North Fork of the Roanoke River". On 7/16/2022, 7/22/2024, and 8/2/2024 the Environmental Auditor conducted site evaluations and observed no project related impacts at S-G36. Per the Closure section of the IR on 7/26/2024, the VADEQ inspector observed turbid conditions upstream and downstream of the MVP project due to a strong storm event late 7/22/2024. The VADEQ observed no project related impacts to S-G36 (North Fork of the Roanoke River). No compliance issues were observed.
7/25/2024	Catawba Road	1	A third party complaint was observed and filed with the VADEQ on 7/25/2024 (Pollution Investigation Report_IR #314813). The complainant alleged "persistent poor stream water quality" in the North Fork of the Roanoke River "one mile downstream from the MVP". On 7/16/2022, 7/22/2024, and 8/2/2024 the Environmental Auditor conducted site evaluations and observed no project related impacts at S-G36 (North Fork of the Roanoke River). Per the Closure section of the IR on 7/29/2024, the VADEQ inspector observed no project related impacts and no compliance issues were observed at S-G36.
ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS			
DATE OF OBSERVATION	OBSERVATIONS	CONCLUSION AND RECOMMENDATIONS	
7/22/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-MN-268.01 (GAS), MVP-MN-276.03 (access road), and MVP-MN-276.03 (GAS).	The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Assistant LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to ESC measures repair/maintenance and enhancements along an access road, and not installing defective soil stabilization blanket (SSB) which likely occurred during the manufacturing process.  The Environmental Auditor conducted site evaluations at MVP-MN-268.01 (GAS) where off right of way and environmental resource impacts occurred above and at S-PP23 and S-G40 due to strong storm events on 7/21/2024. Based on the evaluation, it appeared that the permanent waterbars and end treatments concentrated runoff downslope, caused erosion to overwhelm the ESC/SWM measures, resulting in the off right of way and environmental resource impacts. At the time of the evaluation, it appeared that the sediment removal was initiated within the streams. It should be noted the EA observed the ESC/SWM measures installed and functional on the slope east of S-PP23 per an evaluation conducted on 7/16/2024.	
8/2/2024	The Environmental Auditor conducted site evaluations at MVP-MN-268.01 (GAS), MVP-MN-270 (access road), and MVP-MN-270 (CIS/GAS).	The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to ESC measures repair/maintenance and proper installation, installing Soil Stabilization Matting (SSM) with enhanced anchoring pins/staples on slopes where recent erosion occurred and resulted in off right of way/environmental resource impacts, installing earthen waterbars across a temporary travel lane, and conducting access road maintenance. The Environmental Auditor also communicated concerns regarding daily MVP Punchlists concerns related to ensuring items are not closed out if work is still occurring based on the punchlist comments and ensuring additional punchlist items are added to include the source(s) which caused off right of way and/or environmental resource impacts.  The Environmental Auditor conducted site evaluations at MVP-MN-268.01 (GAS) where off right of way and environmental resource impacts occurred above and at S-G39 due to strong storm events coupled with existing saturated conditions that occurred on 7/22/2024. Based on the evaluation, it appeared that the permanent waterbars and end treatments concentrated runoff downslope, caused erosion to overwhelm the ESC/SWM measures, resulting in the off right of way and environmental resource impacts. At the time of the evaluation, it appeared that the sediment was removed from the stream. Temporary ESC measures and permanent SWM measures repairs were underway on the slope west of S-G39. The off right of way area impacted by the storm event had upslope sediment control measures installed; however, the Environmental Auditor recommended installing additional measures at the toe of the slope immediately above S-G39. The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding concerns related to closing out the punchlist items prior to all repairs being completed.  The Environmental Auditor conducted site follow evaluations at MVP-MN-268.01 (GAS) where off right of way and environmental resource impacts occurred above and at S-PP23 and S-G40 due to strong storm events on 7/21/2024. Based on the evaluation, it appeared that repairs have been conducted to the ESC measures and permanent waterbars and end treatments impacted by the 7/21/2024 storm events. Based on a stream evaluation at S-PP23 the Environmental Auditor observed two locations where additional sediment removal should be conducted and discussed this issue with the onsite EI. The off right of way sediment in the upland locations appeared to be removed and the impacted areas stabilized at the time of the evaluation. A temporary travel lane was constructed and temporary bridge crossings reinstalled across S-PP23 and S-G40. It should be noted that a high intensity/short duration rainfall event occurred while onsite and upon driving from the project area the water flowing in the North Fork Roanoke River appeared to be clear along Catawba Road downstream of the project area; however, heavy sediment laden runoff was observed from private driveways discharging to the North Fork Roanoke along North Fork Road.  The Environmental Auditor conducted site evaluations at MVP-MN-270 (CIS/GAS) where off right of way and environmental resource impacts occurred above and at S-MM15 due to strong storm events on 7/22/2024. Based on the evaluation, it appeared that the permanent waterbars and end treatments concentrated runoff downslope, caused erosion to overwhelm the ESC/SWM measures, resulting in the off right of way and environmental resource impacts. At the time of the evaluation, it appeared that the SWM measures and most ESC measures have been repaired; however, severe erosion along the east edge of the right of way was not repaired and temporary sediment control measures were installed. The Environmental Auditor observed sediment removed from the S-MM15 stream channel within the right of way at the time of the evaluation. The off right of way sediment within the upland area and downstream within S-MM15 has not been removed as long term extension requests were approved until landowner access is granted. It should be noted that the Environmental Auditor observed the S-MM15 impact area extending to the MVP-MN-270 access road. The Environmental Auditor recommended installing SSM (SC-250 or equivalent) on the steep slope where erosion occurred. The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding concerns related to closing out the punchlist items prior to all repairs being completed.	
7/22/2024 through 8/4/2024	<p>The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread H Project. However, the Environmental Auditor communicated the following concerns: The Environmental Auditor communicated with the Assistant LEI and EC regarding Sediment Tracker and daily MVP Punchlist documentation. The Environmental Auditor also communicated with the Chief EI and MVP Environmental staff regarding daily MVP Punchlists concerns related to ensuring items are not closed out if work is still occurring based on the punchlist comments and ensuring additional punchlist items are added to include the source(s) which caused off right of way and/or environmental resource impacts. The Environmental Auditor communicated concerns related to SWPPP VSIR documentation not reflecting actual site conditions at the time of the SWPPP inspection related to items that have not been completed in entirety. The Environmental Auditor recommended reopening the items and ensuring the future daily MVP Punchlists are set up to include separate items for temporary ESC measures, long term repairs via extension requests, and off right of way/environmental resource impacts.</p> <p>The Environmental Auditor communicated with all Spread LEIs on 7/31/2024 regarding the Bi-Weekly reporting period ending on 8/4/2024. The Environmental Auditor provided continued to recommend to installing SSB when straw mulch is rendered ineffective per Section 3.2 of the Annual Standards and Specifications and ensure the SSB is properly installed per the ESC Plan requirements. It should be noted that the Environmental Auditor continues to observe improper SSB anchoring throughout the Spreads which resulted in exacerbated erosion under the blanket.</p>	The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and conducting enhancements as needed throughout the Spread H project. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector (LEI), Assistant LEI, and Environmental Coordinator, 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		



MOUNTAIN VALLEY PIPELINE  
SPREAD H  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 8/5/2024 through 8/18/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 8/18/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>34</b> conducted from 8/5/2024 through 8/18/2024 (includes PY-006); It should be noted that SWPPP inspections were not conducted on 8/8/2024 due to safety concerns related to Tropical Storm Debby. The VADEQ was notified in advance regarding the postponed inspections.											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 8/5/2024 through 8/18/2024 (includes Carry Over Items from 8/4/2024): <b>61</b>											
Total Number of ODCP Inspections at Laydown Yard PY-006: <b>7</b> (8/5/2024 through 8/11/2024); <b>7</b> (8/12/2024 through 8/18/2024)											
Total Number of VA DEQ Observations from 8/5/2024 through 8/18/2024: <b>1</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>1</b> (A third party complaint was observed and filed with the VADEQ on 8/17/2024 (Pollution Investigation Report_IR #315153). The complainant alleged "Mountain Valley Pipeline refueling" within a 100 ft of a wetland and sensitive area" on Yellow Finch Road (MVP-MN-278.01). It should be noted that based on FERC Procedure IV.A.1.d where a 100 feet refueling buffer is unavoidable due to site restrictions, Yellow Finch Lane was determined to be considered a special case per the EIs determination. As part of determination, special measures have been implemented by the contractor to avoid environmental resource impacts during refueling activities. The VADEQ has been aware of this condition since 2023 and allowed refueling to occur. Per the VADEQ website, formal Closure remains pending). <b>Refer to Landowner/Third Party Related Complaints for further discussion.</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>1</b> (On 8/13/2024, the EI observed an off right of way impact west of MVP-MN-276.03. On 8/8/2024, storm event from Tropical Storm Debby with intervals of high intensity/short duration rainfall produced approximately 2 inches of rainfall in 14 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and the area stabilized within the required timeframe via an extension request approval. No environmental resources were impacted). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>0</b>											
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: <b>0</b>											
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 8/5/2024 through 8/18/2024.											
CARRY OVER ITEMS FROM 8/4/2024											
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
4/12/2024	0.5"-2.6" - 18 Hours *Intermittent light rainfall followed by high intensity/short duration storm events occurred on 4/11/2024	1		1			1	1 on 4/13/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/8/2024		1		1			1	1 on 5/9/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted. Currently, landowner permission has been denied.
5/15/2024	0.8"-1.3" - 16 Hours *Precipitation with periods of high intensity/short duration rainfall occurred on 5/14/2024 into early morning 5/15/2024	3		3			3	3 on 5/16/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	3		3			3	3 on 7/6/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/15/2024		1		1			1	1 on 7/16/2024 extended indefinitely upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted. Currently, landowner permission has been denied.
7/18/2024	0.0"-0.4" - 1 Hour *Scattered storms occurred on late 7/17/2024 and 0.4"-1.2" - 2 Hours *A strong thunderstorm occurred on 7/18/2024	1	1				1	1 on 7/19/2024 extended indefinitely upon landowner permission			The EI identified an environmental resource impact at S-IJ50 east of MVP-RO-279.01. Per the Environmental Auditor's Partial Bi-Weekly Report ending on 7/7/2024, this is the same location where impacts occurred from the 7/4/2024 storm event. On 7/18/2024, the contractor staff was completing ESC/SWM repairs on the right of way due to the 7/4/2024 storm event. On 7/18/2024, a strong storm event with high intensity/short duration rainfall caused severe erosion and portions of the right of way to slough, overwhelming the ESC measures, and subsequently impacting approximately 500 feet of S-IJ50. The VADEQ was immediately notified and temporary ESC measures installed. An indefinite extension request was approved by the VADEQ until landowner access is granted. It should be noted that the Spread H Environmental inspection staff, contractor staff, and MVP Environmental staff are coordinating to implement enhanced repair measures to minimize potential future impacts. The LEI submitted a revised Agency Compliance Report (Problem Area Report #953) on 7/25/2024. The MVP Environmental staff submitted a Final Notice of Force Majeure Declaration on 7/28/2024.
7/23/2024	0.5"-1.8" - 3.25 Hours *Strong thunderstorms occurred late on 7/22/2024	3	1	2			3	3 on 7/24/2024 extended indefinitely upon landowner permission			Two items were identified as off right of way sediment impacts within upland areas and one item was identified as an environmental resource impact at S-MM15. These items received indefinite extension requests approved by the VADEQ until landowner permission is granted to remove the material from the impacted areas. At S-MM15, significant erosion occurred along the edge of the right of way impacted approximately 400 feet off right of way within an upland area subsequently impacting 4,000 feet of the stream. The VADEQ was immediately notified and most ESC measures were repaired/enhanced. Landowner permission was requested and an indefinite extension request was approved by the VADEQ. The MVP Environmental staff submitted a Final Notice of Force Majeure Declaration on 8/2/2024.
8/4/2024	0.1"-1.6" - 2.25 Hours *Scattered storm events with area of high intensity/short duration rainfall occurred on 8/3/2024	4					4	1 on 8/7, 8/10, and 8/13/2024 to be completed on 8/16/2024 due to wet conditions		3 on 8/5/2024 1 on 8/15/2024	Four items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.



MOUNTAIN VALLEY PIPELINE  
SPREAD H  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 8/19/2024 through 9/1/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/1/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>36</b> conducted from 8/19/2024 through 9/1/2024 (includes PY-006)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 8/19/2024 through 9/1/2024 (includes Carry Over Items from 8/18/2024): <b>24</b>											
Total Number of ODCP Inspections at Laydown Yard PY-006: <b>6</b> (8/19/2024 through 8/24/2024); <b>6</b> (8/26/2024 through 8/31/2024)											
Total Number of VA DEQ Observations from 8/19/2024 through 9/1/2024: <b>2</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>1</b> (A third party complaint was observed on 8/26/2024 and filed with the VADEQ on 8/27/2024 (Pollution Investigation Report_IR #315299). The complainant alleged "an unbelievable amount of dust coming off the MVP worksites". It should be noted that during the reported timeframe weather and soil conditions were extremely dry in locations where final restoration was occurring. Based on communication with the LEI, water was applied to the slope for dust suppression activities throughout the dry period. On 8/31/2024, a storm event with high intensity/short duration rainfall occurred across the spread which provided additional dust suppression. Based on the VADEQ website, Formal Closure remains pending). <b>Refer to Landowner/Third Party Reported Complaints for further discussion.</b> <b>Per the Closure section of the VADEQ Pollution Investigation Report #315153 dated 8/19/2024 based on a third party complaint received by the VADEQ on 8/17/2024, the VADEQ concluded no pollution observed and no corrective actions specified.</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>0</b>											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>1</b> (On 8/30/2024, the EI observed an off right of way impact west of MVP-MN-276.03. On 8/29/2024, a storm event with an interval of high intensity/short duration rainfall produced approximately 0.5 inches of rainfall in 1.25 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified and ESC measures repaired/enhanced within the required timeframe. An indefinite an extension request was approved by the VADEQ until landowner permission is granted to remove the off right of way sediment. No environmental resources were impacted). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>0</b>											
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: <b>0</b>											
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 8/19/2024 through 9/1/2024.											
CARRY OVER ITEMS FROM 8/18/2024											
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
4/12/2024	0.5"-2.6" - 18 Hours *Intermittent light rainfall followed by high intensity/short duration storm events occurred on 4/11/2024	1		1			1	1 on 4/13/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/8/2024		1		1			1	1 on 5/9/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted. Currently, landowner permission has been denied.
5/15/2024	0.8"-1.3" - 16 Hours *Precipitation with periods of high intensity/short duration rainfall occurred on 5/14/2024 into early morning 5/15/2024	3		3			3	3 on 5/16/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	3		3			3	3 on 7/6/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/15/2024		1		1			1	1 on 7/16/2024 extended indefinitely upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
7/18/2024	0.0"-0.4" - 1 Hour *Scattered storms occurred on late 7/17/2024 and 0.4"-1.2" - 2 Hours *A strong thunderstorm occurred on 7/18/2024	1	1				1	1 on 7/19/2024 extended indefinitely upon landowner permission	1 on 8/20/2024		The EI identified an environmental resource impact at S-IJ50 east of MVP-RO-279.01. On 7/18/2024, a strong storm event with high intensity/short duration rainfall caused severe erosion and portions of the right of way to slough, overwhelming the ESC measures, and subsequently impacting approximately 500 feet of S-IJ50. The Spread H Environmental inspection staff, contractor staff, and MVP Environmental staff developed a long term restoration plan and implemented enhanced ESC measures that entailed rip rap installation on a portion of the slope.
7/23/2024	0.5"-1.8" - 3.25 Hours *Strong thunderstorms occurred late on 7/22/2024	3	1	2			3	3 on 7/24/2024 extended indefinitely upon landowner permission	1 on 8/20/2024 (off right of way impact)  1 on 8/22/2024 (environmental resource impact)		Two items were identified as off right of way impacts within upland areas and one was completed within the required timeframe via an extension request approval. The VEDEQ was immediately notified, landowner permission was granted, enhanced ESC measures installed, off right of way sediment removed, and the impacted area stabilized within the required timeframe via an extension request approval. <b>The remaining item received an indefinite extension request approval until landowner permission is granted.</b>  One item was identified as an environmental resource impact at S-MM15. The VADEQ was immediately notified, landowner access was granted, ESC measures repaired/enhanced, sediment removed from the stream, and adjacent upland areas stabilized within the required timeframe via an extension request approval. The MVP Environmental staff submitted a Final Notice of Force Majeure Declaration on 8/2/2024.



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
8/20/2024		1					1			1 on 8/22/2024	One item was identified requiring SWM repair/maintenance and completed within the required timeframe.
8/21/2024		1					1			1 on 8/24/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
8/22/2024		2					2			2 on 8/24/2024	Two items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
8/27/2024		1					1			1 on 8/28/2024	One item was identified requiring Pollution Prevention repair/maintenance and completed within the required timeframe.
8/28/2024		1					1			1 on 8/28/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
8/30/2024	0.0"-1.5" - 4.25 Hours *Scattered storms with intervals of high intensity/short duration rainfall occurred on late 8/29/2024	5		1			5 (includes off right of way impact)	1 on 8/31/2024 extended indefinitely upon landowner permission		4 on 8/31/2024	Five items were identified requiring ESC repair/maintenance and four were completed within the required timeframe. One item was identified as an off right of way impact (three locations within 50 feet of each other) approximately 50 feet within an upland area east of MVP-MN-276.03. On 8/29/2024, a storm event with an interval of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified and the ESC measures repaired/maintained. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (Problem Area Report #1033) on 8/30/2024. <b>An indefinite extension request was approved by the VADEQ until landowner access is granted.</b>
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
8/28/2024		2					2		2 on 8/28/2024		Two items were identified requiring ESC and Pollution Prevention 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	
8/27/2024	MVP-MN-278.01						1			A third party complaint was observed on 8/26/2024 and filed with the VADEQ on 8/27/2024 (Pollution Investigation Report_IR #315299). The complainant alleged "an unbelievable amount of dust coming off the MVP worksites". It should be noted that during the reported timeframe weather and soil conditions were extremely dry in locations where final restoration was occurring. Based on communication with the LEI, water was applied to the slope for dust suppression activities throughout the dry period. A storm event with high intensity/short duration rainfall occurred across the spread on 8/31/2024 which provided additional dust suppression. Based on the VADEQ website, Formal Closure remains pending.	
ENVIRONMENTAL AUDITOR FIELD OBSERVATIONS AND RECOMMENDATIONS											
DATE OF OBSERVATION	OBSERVATIONS							CONCLUSION AND RECOMMENDATIONS			
8/21/2024	The Environmental Auditor conducted site evaluations at the following locations: Cahas Mountain Road #1 (CIS/GAS), Flanders Road (CIS), MVP-FR-292.01 (Access Road), MVP-FR-292.01 (GAS), MVP-FR-292 (CISGAS), MVP-FR-291 (Access Road), and MVP-FR-291 (GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Assistant LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to ESC measures repair/maintenance and enhancements along a permanently restored access road where legacy erosion has been an issue. The Environmental Auditor also noted burlap sand bags incorporated into permanent waterbar structures damaged via heavy rainfall events. The Environmental Auditor communicated this observation as this measures is not part of the approved ESC and SWM Plans.			
8/26/2024	The Environmental Auditor conducted site evaluations at MVP-AR-028 and MVP-ATWS-1566.							The Environmental Auditor observed locations where the ESC measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor evaluated the dewatering structure installed for upcoming lake tank dewatering activities and communicated with the Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding an observation related to ensuring the pumped water filter bags are properly sized based on pumping rates.			
8/27/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-MN-268/268.01 (GAS), MVP-MN-270 (CIS), MVP-MN-270 (access road), Bradshaw Road (GAS), and MVP-AR-028.							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to proper soil stabilization blanket (SSB) installation, anchoring straw mulch, and monitoring permanently restored access roads following a heavy runoff event. The Environmental Auditor conducted a follow up evaluations where previous off right of way and environmental resource impacts occurred at MVP-MN-268.01 (GAS) and MVP-MN-270 (CIS/GAS). The Environmental Auditor observed repairs conducted to the ESC/SWM measures, sediment removed, and impacted areas stabilized.			
8/19/2024 through 9/1/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread H Project.  The Environmental Auditor communicated with all Spread LEIs on 8/28/2024 regarding the Bi-Weekly reporting period ending on 9/1/2024.							The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and conducting enhancements as needed throughout the Spread H project. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector (LEI), Assistant LEI, and Environmental Coordinator, 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										

MOUNTAIN VALLEY PIPELINE  
SPREAD H  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 9/2/2024 through 9/15/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/15/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>31</b> conducted from 9/2/2024 through 9/15/2024 (includes PY-006): <b>Holiday on 9/2/2024</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 9/2/2024 through 9/15/2024 (includes Carry Over Items from 9/1/2024): <b>30</b>											
Total Number of ODCP Inspections at Laydown Yard PY-006: <b>5</b> (9/3/2024 through 9/7/2024); <b>6</b> (9/9/2024 through 9/14/2024): <b>Holiday on 9/2/2024</b>											
Total Number of VA DEQ Observations from 9/2/2024 through 9/15/2024: <b>1</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Per the Closure section of the VADEQ Pollution Investigation Report #315299 dated 9/4/2024 based on a third party complaint received by the VADEQ on 8/27/2024, the VADEQ concluded no compliance issues were observed.											
Total Number of Right of Way Impacts Caused by Third Parties: <b>4</b> (landowner traffic and unauthorized traffic)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>0</b>											
Total Number of Environmental Resource Impacts: <b>0</b>											
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: <b>0</b>											
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 9/2/2024 through 9/15/2024.											
CARRY OVER ITEMS FROM 9/1/2024											
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
4/12/2024	0.5"-2.6" - 18 Hours *Intermittent light rainfall followed by high intensity/short duration storm events occurred on 4/11/2024	1		1			1	1 on 4/13/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/8/2024		1		1			1	1 on 5/9/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted. Currently, landowner permission has been denied.
5/15/2024	0.8"-1.3" - 16 Hours *Precipitation with periods of high intensity/short duration rainfall occurred on 5/14/2024 into early morning 5/15/2024	3		3			3	3 on 5/16/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	3		3			3	3 on 7/6/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/15/2024		1		1			1	1 on 7/16/2024 extended indefinitely upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
7/23/2024	0.5"-1.8" - 3.25 Hours *Strong thunderstorms occurred late on 7/22/2024	1		1			1	1 on 7/24/2024 extended indefinitely upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
8/30/2024	0.0"-1.5" - 4.25 Hours *Scattered storms with intervals of high intensity/short duration rainfall occurred on late 8/29/2024	1		1			1	1 on 8/31/2024 extended indefinitely upon landowner permission	1 on 9/7/2024		One item was identified as an off right of way impact (three locations within 50 feet of each other) and completed within the required timeframe via an extension request approval. Landowner permission was granted, sediment removed and the impacted area stabilized.

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
9/3/2024		6					6			1 on 9/3/2024 2 on 9/4/2024 3 on 9/5/2024	Six items were identified requiring ESC, SWM, and Pollution Prevention repair/maintenance and completed within the required timeframe.
9/4/2024		1					1			1 on 9/6/2024	One item was identified requiring Pollution Prevention repair/maintenance and completed within the required timeframe.
9/5/2024		6				1	5			6 on 9/6/2024	Six items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to landowner traffic.
9/10/2024		2				1	1		1 on 9/11/2021	1 on 9/10/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic.
9/11/2024		2					2			2 on 9/11/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
9/13/2024		2				2				2 on 9/14/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. Both items were caused by third party impacts related to unauthorized traffic.
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
9/11/2024		1					1			1 on 9/12/2024	One item was identified requiring ESC 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			
9/6/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-RO-283 (CIS/GAS), MVP-RO-283 (Access Road), MVP-RO-279.01 (GAS), MVP-RO-279.02 (CIS), Honeysuckle Road (CIS), and MVP-RO-282 (CIS/GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Assistant LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to ESC measures repair/maintenance, installing Soil Stabilization Blanket (SSB) on slopes 3:1 and greater, and installing compost filter sock (CFS) check dams along the perimeter sediment controls on an access road.			
9/10/2024	The Environmental Auditor conducted site evaluations at the following locations: Bottom Creek Road (GAS), MVP-RO-286 (CIS/GAS), MVP-RO-287 (CIS/GAS), MVP-RO-288 (CIS), and US Highway 221.							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to a location where a slope is sloughing. The Environmental Auditor was informed by the LEI that this location is currently being evaluated by a geotech to develop remediation efforts.			
9/12/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-MN-276.03 (CIS), MVP-MN-276.03 (access road), MVP-PY-006, MVP-MN-278.01 (GAS), MVP-AR-028 (access road), and MVP-AR-028 (dewatering location).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Environmental Coordinator EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to ESC measures requiring repair/maintenance on an access road. The EA also communicated SWM measures damaged on another access road and was informed that a higher grade geogrid is slated to replace the existing one due to slope steepness and traffic.			
9/2/2024 through 9/15/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread H Project.  The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding observations related to SWPPP VSIR documentation.  The Environmental Auditor communicated with all Spread LEIs on 9/10/2024 regarding the Bi-Weekly reporting period ending on 9/15/2024. The Environmental Auditor provided feedback on the following: ensuring that corrective action items noted in the VSIRs are added to the respective daily MVP Punchlists; enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the Annual Standards and Specifications due to concentrated flow resulting in erosion and/or off right of way/environmental resource impacts, properly embedding/anchoring SSB per the required ESC Plans, and inspecting compost filter sock for undermining subsequently resulting in erosion.							The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and conducting enhancements as needed throughout the Spread H project. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector (LEI), Assistant LEI, and Environmental Coordinator, 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										

MOUNTAIN VALLEY PIPELINE  
SPREAD H  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 9/16/2024 through 9/29/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/29/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>36</b> conducted from 9/16/2024 through 9/29/2024 (includes PY-006); <b>SWPPP inspections postponed on 9/27/2024 due to hazardous right of way conditions as a result of Hurricane Helene.</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 9/16/2024 through 9/29/2024 (includes Carry Over Items from 9/1/2024): <b>105</b>											
Total Number of ODCP Inspections at Laydown Yard PY-006: <b>7</b> (9/16/2024 through 9/22/2024); <b>6</b> (9/23/2024 through 9/28/2024)											
Total Number of VA DEQ Observations from 9/16/2024 through 9/29/2024: <b>0</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>1</b> (unauthorized traffic)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>1</b>											
Total Number of Off Right of Way Impacts: <b>5</b> ( <b>1</b> . On 9/18/2024, the Assistant LEI observed an off right of way impact within an upland area east of MVP-RO-279.01. From late 9/16/2024 through early 9/18/2024, a prolonged storm event from a tropical system with intervals of high intensity/short duration rainfall produced approximately 7.0 inches in 36 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures temporarily repaired/enhanced, sediment removed, and the area stabilized. A long term permanent stabilization plan is being developed to prevent future impacts in this area. No environmental resources were impacted. <b>2</b> . On 9/21/2024, the Assistant LEI observed an off right of way impact within an upland area west of MVP-RO-279.02. From late 9/16/2024 through early 9/19/2024, a prolonged storm event from a tropical system with intervals of high intensity/short duration rainfall produced approximately 7.2 inches in 36 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified and the ESC measures temporarily repaired. A long term extension request has been approved until landowner access is granted to retrieve the sediment and conduct long term stabilization activities. No environmental resources were impacted. <b>3-5</b> . On 9/28/2024, the Assistant LEI and EI observed off right of way impacts within upland areas west of MVP-MN-278.01 (2) and east of MVP-RO-279 (1). On 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated ground conditions produced approximately 3.5 inches of rainfall in 7 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified and extension requests were approved until landowner access is granted. A request has been submitted to the VADEQ to extend earthen waterbars across the full width of the right of way as the permanent waterbar end treatments contributed to the impacts. No environmental resources were impacted). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>3</b> ( <b>1-3</b> . On 9/28/2024, the Assistant LEI observed an environmental resource impact at S-EF19 west of MVP-MN-278.01 and the EI observed environmental resource impacts at W-II62 MVP-RO-287 (access road) and at W-KL1 MVP-RO-288 (access road). On 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall events and saturated conditions produced approximately 2.2-3.5 inches of rainfall in 7 hours causing erosion/sloughing resulting in ESC and SWM measures to become overwhelmed at S-EF19. Gravel washout from MVP-RO-287 and MVP-RO-288 (access roads) caused ESC measures to become overwhelmed at W-II62 and W-KL1, respectively. The VADEQ was immediately notified and an extension request was approved until landowner access is granted. Temporary ESC repairs/enhancements will be conducted at these locations and long term enhanced ESC measures are planned for the slopes above S-EF19. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
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: <b>0</b>											
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 9/16/2024 through 9/29/2024.											
CARRY OVER ITEMS FROM 9/15/2024											
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
4/12/2024	0.5"-2.6" - 18 Hours *Intermittent light rainfall followed by high intensity/short duration storm events occurred on 4/11/2024	1		1			1	1 on 4/13/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/8/2024		1		1			1	1 on 5/9/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted. Currently, landowner permission has been denied.
5/15/2024	0.8"-1.3" - 16 Hours *Precipitation with periods of high intensity/short duration rainfall occurred on 5/14/2024 into early morning 5/15/2024	3		3			3	3 on 5/16/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	3		3			3	3 on 7/6/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/15/2024		1		1			1	1 on 7/16/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
7/23/2024	0.5"-1.8" - 3.25 Hours *Strong thunderstorms occurred on late 7/22/2024	1		1			1	1 on 7/24/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is 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
9/17/2024	0.4"-1.7" - 12 Hours *Precipitation from a tropical system with locations receiving intervals of high intensity/short duration rainfall began on late 9/16/2024	3					3			2 on 9/17/2024 1 on 9/20/2024	Three items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
9/18/2024	0.7"-5.5" - 24 Hours *Precipitation from a tropical system with locations receiving intervals of high intensity/short duration rainfall continued from 9/17/2024	18		1			18 (includes off right of way impact)	3 on 9/21/2024 to be completed on 9/24/2024 due to wet conditions  1 on 9/21, 9/24, and 9/27/2024 to be completed on 9/30/2024 due to wet conditions	2 on 9/19/2024	8 on 9/19/2024 1 on 9/20/2024 3 on 9/21/2024 1 on 9/22/2024 (extension request) 2 on 9/24/2024 (extension requests)	Eighteen items were identified requiring ESC, SWM, and Pollution Prevention repair/maintenance and 17 were completed within the required timeframe. One item was identified as an off right of way impact paralleling the right of way for approximately 70 linear feet extending 10 feet off right of way within an upland area east of MVP-RO-279.01. From 9/16/2024 through 9/18/2024, a prolonged storm event from a tropical system caused ESC measures to become overwhelmed on the slope above S-IJ50. The impacted area was within the permanent between the rip rap armor and edge of right of way. The VADEQ was immediately notified, landowner access granted, ESC measures temporarily repaired, sediment removed, and the area stabilized via an extension request approval. No environmental resources were impacted. A long term stabilization plan is being developed to prevent future impacts throughout this area. The LEI submitted and Agency Compliance Form (Problem Area Report #1046) on 9/18/2024.  <b>The remaining item received extension request approvals due to wet conditions.</b>
9/19/2024	0.1"-1.7" - 6 Hours *Scattered thunderstorms occurred on late 9/18/2024	1					1			1 on 9/20/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
9/20/2024	0.0"-1.1" - 2.25 Hours *Isolated thunderstorms with intervals of high intensity/short duration rainfall occurred on late 9/19/2024	6					6			6 on 9/21/2024	Six items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe.
9/21/2024		1		1			1 (off right of way impact)	1 on 9/22/2024 extended indefinitely to be completed upon landowner permission			One item was identified requiring ESC and SWM repair/maintenance and removal of off right of way sediment. The off right of way impact occurred approximately 1800 feet in length and a distance of approximately 600 feet from the edge of the right of way within an upland area west of MVP-RO-279.02. From 9/16/2024 through 9/18/2024, a prolonged storm event from a tropical system caused ESC and SWM measures to become overwhelmed on the slope above the AEP powerline crossing. It should be noted that this impact was not documented immediately following the rainfall event due to hazardous conditions preventing access to the off right of way. Upon discovery of the off right of way impact, the VADEQ was immediately notified and an indefinite extension request was approved until landowner access is granted. Throughout the remainder of the week following the precipitation event, the contactor staff initiated repairs on the ESC and SWM measures throughout the slope. No environmental resources were impacted. An enhanced stabilization plan is being developed for this location. The LEI submitted and Agency Compliance Form (Problem Area Report #1050) on 9/21/2024.
9/23/2024		1				1				1 on 9/24/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe. This item was caused by third party impacts related to unauthorized ATV traffic.
9/25/2024	0.5"-1.4" - 4 Hours *Moderate to heavy rainfall occurred on late 9/24/2024 and early morning on 9/25/2024	4					4	1 on 9/28/2024 to be completed on 10/1/2024 due to wet conditions		1 on 9/25/2024 2 on 9/26/2024	Four items were identified requiring ESC repair/maintenance and three were completed within the required timeframe. <b>One of the identified items received and extension request approval due to wet conditions.</b>
9/26/2024	0.7"-1.7" - 3.5 Hours *Thunderstorms occurred on late 9/25/2024 and early morning 9/26/2024	11					11	11 on 9/29/2024 to be completed on 10/2/2024 due to wet conditions			Eleven items were identified requiring ESC and SWM repair/maintenance.  <b>These items received extension requests due to wet conditions.</b>
9/28/2024	1.1"-3.5" - 7 Hours *Precipitation from remnants of Hurricane Helene with intervals of high intensity/short duration rainfall occurred on 9/27/2024	50	3	3	1		50 (includes off right of way and environmental resource impacts)	1 on 9/29/2024 to be completed on 9/30/2024 (engineer review/redlines)  5 on 9/29/2024 extended indefinitely to be completed upon landowner permission	1 on 9/29/2024 (environmental resource impact)		Fifty items were identified requiring ESC and SWM repair/maintenance and one was completed within the required timeframe. One of the items was caused by weather related damage due to a fallen tree. Three items were identified as off right of way impacts up to 50 feet within upland areas west of MVP-MN-278.01 (2) and east of MVP-RO-279.01 (1). On 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused severe erosion and sloughing that overwhelmed ESC and SWM measures. The VADEQ was immediately notified. Extension requests were approved until landowner access is granted at the remaining locations. A request has been submitted to the VADEQ to extend earthen waterbars across the full width of the right of way as the permanent waterbar end treatments contributed to the impacts. No environmental resources were impacted. The LEI submitted Agency Compliance Forms (Problem Area Reports #11046, #1077, and #1080) on 9/30/2024. The Environmental Auditor will conduct evaluations during the upcoming Bi-Weekly reporting period.  Three items were identified as environmental resource impacts at S-EF19 west of MVP-MN-278.01, W-IJ62 at MVP-RO-287 (access road), and W-KL1 at MVP-RO-288 (access road). The storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused erosion/sloughing on the right of way resulting in ESC and SWM measures to become overwhelmed at S-EF19. Flooding at MVP-RO-287 and MVP-RO-288 caused gravel washout resulting in the ESC measures to become overwhelmed at W-IJ62 and W-KL1, respectively. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, and gravel removed from W-KL1 at MVP-RO-288. Extension requests were approved until landowner access is granted at the remaining locations. Temporary ESC measures repairs/enhancements are slated to be conducted at these locations. Long term enhanced measures are planned to be installed on the slopes above S-EF19. The LEI submitted Agency Compliance Forms (Problem Area Reports #1070, #1075, and #1076) on 9/30/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. The Environmental Auditor will conduct evaluations during the upcoming Bi-Weekly reporting period.  <b>In addition to the 6 items receiving extension request approvals, the remaining 43 items have three days to be completed within the required timeframe.</b>

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
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			
9/17/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-RO-282 (CIS/GAS), MVP-RO-281 (Access Road), and MVP-RO-281.02 (CIS/GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Assistant LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding observations and recommendations related to severe erosion occurring on an access road during a heavy rainfall event affiliated with a tropical system. This observation was included within the daily MVP Punchlist.			
9/18/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-RO-279.01 (GAS), MVP-FR-291 (Access Road), MVP-FR-291 (GAS), MVP-FR-292.01 (Access Road), and MVP-FR-292.01 (GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to installing additional ESC measures on an access road where erosion is occurring, and ESC measures repair/maintenance. The Environmental Auditor conducted an evaluation east of MVP-RO-279.01 where the Assistant LEI observed an off right of way impact on the slope above S-IJ50 due to a prolonged storm event affiliated with a tropical system. The Environmental Auditor observed saturated conditions and the contractor staff initiating repairs and off right of way sediment removal. It appeared that runoff concentrated between the edge of the rip rap installed as slope protection and the edge of the right of way. Based on communication with the LEI and MVP Environmental staff, a long term stabilization plan is being developed for the impacted area.			
9/24/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-FR-292 (CIS/GAS), MVP-MLV-AR-29 (access road), MVP-MLV-AR-29 (CIS/GAS), and Webster Corner Road (CIS/GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding a recommendation to monitor vegetative growth within the mid-section of a permanent access road and conduct restabilization activities as necessary.			
9/16/2024 through 9/29/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread H Project.  The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding observations related to SWPPP VSIR documentation.  The Environmental Auditor communicated with all Spread LEIs on 9/24/2024 regarding the Bi-Weekly reporting period ending on 9/29/2024, Partial Bi-Weekly reporting period (End of Q3 2024) ending on 9/30/2024, and the Q3 2024 reporting period ending on 9/30/2024. The Environmental Auditor provided feedback/recommendations on the following: enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the AS&S and ESC requirements due to steep slopes and concentrated flow conditions resulting in erosion, communicating with the contractor to upgrade the SSB where low grade types are not efficient on steep slopes, concentrated flow conditions, and exhibit low functional longevity, and monitor areas where there is minimal to no vegetative growth and conducted restabilization activities as necessary (includes adding additional lime and fertilizer). It should be noted that the Environmental Auditor also communicated with the MVP Environmental staff on occasions to consider adding biotic soil amendments where soils exhibit low fertility to assist with developing an organic layer over time.							The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and conducting enhancements as needed throughout the Spread H project. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector (LEI), Assistant LEI, and Environmental Coordinator, 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									

MOUNTAIN VALLEY PIPELINE  
SPREAD H  
ENVIRONMENTAL AUDITOR PARTIAL BI-WEEKLY REPORT - 9/30/2024 (END OF Q3 2024 REPORTING PERIOD)

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/30/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 3 conducted on 9/30/2024 (includes PY-006)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations on 9/30/2024 (includes Carry Over Items from 9/29/2024): 82											
Total Number of ODCP Inspections at Laydown Yard PY-006: 1 (9/30/2024)											
Total Number of VA DEQ Observations on 9/30/2024: 0											
Total Number of Landowner/Third Party Reported Complaints: 0											
Total Number of Right of Way Impacts Caused by Third Parties: 0 (unauthorized traffic)											
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: 1 (On 9/30/2024, the EI observed an off right of way impact within an upland area east of MVP-MLV-AR-28. From 9-24-2024 through 9/29/2024, storm events that included remnants from Hurricane Helene produced approximately 7.2 inches of rainfall causing a slope to slough resulting in the ESC measures becoming overwhelmed. The VADEQ was immediately notified. Landowner access has been requested and this item has 24 Hours to be completed within the required timeframe. No environmental resources were impacted). Refer to Environmental Inspector Observations 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 on 9/30/2024)											
CARRY OVER ITEMS FROM 9/29/2024											
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
4/12/2024	0.5"-2.6" - 18 Hours *Intermittent light rainfall followed by high intensity/short duration storm events occurred on 4/11/2024	1		1			1	1 on 4/13/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted.
5/8/2024		1		1			1	1 on 5/9/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted. Currently, landowner permission has been denied.
5/15/2024	0.8"-1.3" - 16 Hours *Precipitation with periods of high intensity/short duration rainfall occurred on 5/14/2024 into early morning 5/15/2024	3		3			3	3 on 5/16/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/5/2024	0.2"-1.7" - 3.25 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on late 7/4/2024	3		3			3 (off right of way impacts)	3 on 7/6/2024 extended indefinitely to be completed upon landowner permission			Three items have been extended indefinitely via VADEQ approval until landowner permission is granted.
7/15/2024		1		1			1	1 on 7/16/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted
7/23/2024	0.5"-1.8" - 3.25 Hours *Strong thunderstorms occurred on late 7/22/2024	1		1			1	1 on 7/24/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted
9/18/2024	0.7"-5.5" - 24 Hours *Precipitation from a tropical system with locations receiving intervals of high intensity/short duration rainfall continued from 9/17/2024	1					1	1 on 9/21, 9/24, 9/27, and 9/30/2024 to be completed on 10/3/2024 due to wet conditions			One item has been extended indefinitely via VADEQ approval until landowner permission is granted
9/21/2024		1		1			1 (off right of way impact)	1 on 9/22/2024 extended indefinitely to be completed upon landowner permission			One item has been extended indefinitely via VADEQ approval until landowner permission is granted
9/25/2024	0.5"-1.4" - 4 Hours *Moderate to heavy rainfall occurred on late 9/24/2024 and early morning on 9/25/2024	1					1	1 on 9/28/2024 to be completed on 10/1/2024 due to hazardous/wet conditions			One item requiring ESC and access road repair/maintenance received an extension request approval due to hazardous/wet conditions.
9/26/2024	0.7"-1.7" - 3.5 Hours *Thunderstorms occurred on late 9/25/2024 and early morning 9/26/2024	11					11	11 on 9/29/2024 to be completed on 10/2/2024 due to hazardous/wet conditions			Eleven items requiring ESC and SWM repair/maintenance received extension request approvals due to hazardous/wet conditions.



9/28/2024	1.1"-3.5" - 7 Hours *Precipitation from remnants of Hurricane Helene with intervals of high intensity/short duration rainfall occurred on 9/27/2024	49	2	3	1		49 (includes off right of way and environmental resource impacts)	1 on 9/29/2024 to be completed on 10/7/2024 (engineer review/redlines)  5 on 9/29/2024 extended indefinitely to be completed upon landowner permission		2 on 9/30/2024	Forty-nine items were identified requiring ESC and SWM repair/maintenance and two were completed within the required timeframe. Three items were identified as off right of way impacts within upland areas west of MVP-MN-278.01 (2) and east of MVP-RO-279.01 (1). Two items were identified as environmental resource impacts at S-EF19 east of MVP-MN-278.01 and W-U62 at MVP-RO-287 (access road). These items received indefinite extension request approvals until landowner permission is granted.  In addition to the 6 items receiving extension request approvals, the remaining 41 items have three days to be completed within the required timeframe.
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
9/30/2024	0.1"-0.6" - 3 Hours *Precipitation with locations receiving intervals of high intensity/short duration rainfall occurred on 9/29/2024	9		1			9 (includes off right of way impact)				Nine items were identified requiring ESC and SWM repair/maintenance. One item was identified as an off right of way impact approximately 10 feet within an upland area east of MVP-MLV-AR-28. On 9/29/2024, a storm event coupled with previous rainfall and saturated conditions caused a slope to slough overwhelming the ESC measures. The VADEQ was immediately notified. Landowner access has been requested and this item has 24 Hours to be completed within the required timeframe. No environmental resources were impacted.  One item has 24 Hours and 7 items have 72 Hours to be completed within the required timeframes
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
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			
9/30/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread H Project.  The Environmental Auditor communicated with the LEI, Assistant LEI, EC, Chief EI, and MVP Environmental staff regarding observations related to SWPPP VSIR documentation.  The Environmental Auditor communicated with all Spread LEIs on 9/24/2024 regarding the Partial Bi-Weekly reporting period (End of Q3 2024) ending on 9/30/2024 and the Q3 2024 reporting period ending on 9/30/2024. The Environmental Auditor provided feedback/recommendations on the following: enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the AS&S and ESC requirements due to steep slopes and concentrated flow conditions resulting in erosion, communicating with the contractor to upgrade the SSB where low grade types are not efficient on steep slopes, concentrated flow conditions, and exhibit low functional longevity, and monitor areas where there is minimal to no vegetative growth and conducted restabilization activities as necessary (includes adding additional lime and fertilizer). It should be noted that the Environmental Auditor also communicated with the MVP Environmental staff on occasions to consider adding biotic soil amendments where soils exhibit low fertility to assist with developing an organic layer over time.							The Environmental Auditor concludes that SWPPP Inspections meet inspection timeframe requirements and recommends continued BMP monitoring and conducting enhancements as needed throughout the Spread H project. Based on the SWPPP, MVP Punchlist findings and communication with the Lead Environmental Inspector (LEI), Assistant LEI, and Environmental Coordinator, 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										



# **Mountain Valley Pipeline Project – Spread I**

## **Environmental Auditor Quarterly Report for Q3 2024**

### **October 15, 2024**

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#### **Environmental Auditor Contact Information**

Joe Crea, CPESC, CPSWQ  
Tetra Tech  
661 Anderson Drive, Suite 200  
Pittsburgh, Pennsylvania 15220

#### **I. Introduction**

The Spread I (portions of Construction Spreads 10 and 11) portion of the Mountain Valley Pipeline Project H-600 (Project) within the State of Virginia begins at approximate station 13415+51 in Franklin County and ends at approximate station 16027+46 in Pittsylvania County. The Spread I Project includes right of way for the pipeline, laydown yards, additional temporary workspaces (ATWS) and temporary/permanent access roads. This Quarterly Report also includes the Transco Interconnect Station, H-602, and H-603 as the Environmental inspection staff from Spread I is covering these portions of the Project. Spread I is located in Franklin and Pittsylvania Counties.

As required by the Virginia Erosion and Sediment Control Law and the Stormwater Management Act Linear Entity, MVP has developed Annual Project Specific 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 I Project to include a Lead Environmental Inspector (LEI) and a staff of Environmental Inspectors (EIs). The LEI/EIs obtained the Virginia Department of Environmental Quality (VADEQ) Erosion and Sediment Control (ESC)/Stormwater Management (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. This reporting period covers July 1, 2024, through September 30, 2024 (Q3 reporting period).

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

- Franklin and Pittsylvania Counties
  - 13415+51-16027+46 and the Transco Interconnect Station (includes H-602 and H-603)
  - Laydown Yards: LY-045/046, LY-032, LY-033, LY-ANC-006, and Blairs Yard. It should be noted that upon completion of permanent restoration at LY-ANC-006 and Blairs Yard, the MVP lease agreement was terminated and these locations were returned to the respective landowners.

\*Based on coordination with the Spread I Environmental inspection staff, the following portions of the right of way have been permanently restored via final grading and permanent stabilization per the approved Annual Standard and Specification details and the ESC/Post Construction SWM Plans:

- 13415+51-16027+46
- H-603: 0+00-24+53
- H-602: 0+00-7+19
- Laydown Yards: LY-045/046, LY-032, LY-033, LY-ANC-006, and Blairs Yard

\*It should be noted that from 9/19/2024 through 9/27/2024, heavy rainfall events leading up to and including remnants from Hurricane Helene caused severe erosion and sloughing impacts at right of way locations within Franklin and Pittsylvania Counties. As a result of the impacts, additional contractor staff including heavy equipment will be mobilized to conduct permanent repairs/enhancements. Repair and restabilization activities will entail traveling through previously restored areas of the right of way and reinstalling temporary bridges across environmental resources to access the impacted areas. Information related to these upcoming activities will be provided in the Q4 2024 report.

## **II. Information Reviewed to Prepare Quarterly Report**

The Environmental Auditor utilized the following resources to assist with evaluating project compliance throughout the Q3 reporting period:

- Daily MVP Punch Lists (includes VADEQ findings);
- Environmental Auditor Bi-Weekly Reports;
- Frequent Communication with the MVP Environmental staff, Chief EI, LEI, and Environmental Coordinator (EC);
- Stormwater Pollution Prevention Plan VSIRs;
- Spread I Rain Gauge Data;
- Spread I Scatter Sheets (Contractor Available Resources and Daily Work Locations);
- Annual Project Specific Standards and Specifications;
- Oil Discharge Contingency Plan (ODCP) Inspection reports;
- Storm Water Pollution Prevention Plans, Erosion and Sediment Control Plans, and Post Construction Stormwater Management Plans;
- MVP 48-Hour Aquatic Resource Notifications;
- VA Off Right of Way Sediment Impact Tracker Spreadsheet;
- Agency Compliance Forms - Problem Area Reports (PARs); and
- Notice of Force Majeure Declaration submitted on 7/15/2024, 7/28/2024, 8/2/2024, 8/14/2024, 8/19/2024, and 8/26/2024

The Environmental Auditor also relied on assistance and information from the MVP Environmental staff, Chief EI, Spread I Environmental inspection staff, contractor Environmental staff, and the Tetra Tech Civil Engineering and Construction Management Departments.

The following sections III. through VI. provide an overall summary for the 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 I-1A, the EIs observed a total of 839 daily punchlist items (includes Carry Over items) requiring repair/maintenance throughout the Q3 reporting period. The Environmental Auditor noted 54 items identified by the EIs as ESC measures damaged by third party impacts related to livestock traffic, wildlife traffic, unauthorized traffic, agricultural equipment traffic, and landowner traffic. One item was a weather related impact caused by a fallen tree due to rain and wind impacts from remnants of Hurricane Helene. The items provided on the daily MVP Punchlists throughout the Q3 reporting period were communicated to the contractor Environmental staff and most items were addressed within the VADEQ approved timeframe (24 hours/Three Days or as extended by VADEQ authorization). However, 28 items exceeded the three day timeframe requirement. **Refer to Table I-1C, Sections V., VI., and VII., and the respective Bi-Weekly Reports for further detailed information.**

During the Q3 reporting period the Spread I Environmental inspection staff observed 39 off right of way impacts within upland locations and 17 environmental resource impacts at S-CD8 (Bar Ridge Road), S-AB8 (Bar Ridge Road), S-DD3 (Ramsey Memorial Road), S-MM44 (Indian Cave Road), S-SS8 (Bar Ridge Road), three separate impacts at S-B6 (Riddle Road), S-A7 (Listening Hill Road), S-OO2 (Chalk Level Road), S-G15 (Ramsey Memorial Road), two separate impacts S-H37 (Jacks Creek Road), W-H17 (Highway 40), S-G18 (Timber Ridge Road), S-G13 (Ramsey Memorial Road), and S-II9 (House Rock Road).

On 7/5/2024, the EIs observed 2 off right of way sediment impacts up to 50 feet within upland areas west of Ramsey Memorial Road. On 7/4/2024, strong storm events with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. **Refer to Section VI. for further discussion.**

On 7/6/2024, the EIs observed 23 off right of way sediment impacts up to 150 feet within upland areas west of Listening Hill Road, east of Bar Ridge Road, west of Ramsey Memorial Road, and west of Snow Creek Road. On 7/4/2024, strong storm events with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, sediment removed, ESC and SWM measures repaired/enhanced, and the areas stabilized within the required timeframe with 5 of those locations receiving extension request approvals. The LEI submitted an Agency Compliance Form (PAR #956) on 7/6/2024. **Refer to Section VI. for further discussion.**

On 7/6/2024, the EIs observed three environmental resource impacts at S-CD8 east of Bar Ridge Road, S-AB8 east of Bar Ridge Road, and S-DD3 west of Ramsey Memorial Road. On 7/4/2024, strong storm events with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, ESC and SWM measures repaired/maintained, sediment removed, and areas stabilized within the required timeframe. The LEI submitted Agency Compliance Forms (PARs #971, #972, and #973) on 7/6/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 7/15/2024. **Refer to Section VI. for further discussion.**

On 7/19/2024, the EI observed an off right of way sediment impact approximately 15 feet within an upland location west of Listening Hill Road. On 7/18/2024, strong storm events caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. **Refer to Section VI. for further discussion.**

On 7/19/2024, the EI observed an environmental resource impact at S-MM44 east of Indian Cave Road and the Environmental Auditor observed an environmental resource impact at S-SS8 east of Bar Ridge Road. On 7/18/2024, strong storm events caused ESC measures to become overwhelmed impacting approximately 100 feet of S-MM44. It should be noted that based on communication from the Environmental Auditor on 7/5/2024, ESC measures above the stream were not repaired/maintained when this impact occurred. At S-SS8, severe gully erosion under the SSB on the west streambank contributed to the impact. The VADEQ was immediately notified, landowner access granted (S-MM44), ESC

measures repaired/enhanced, and sediment removed within the required timeframe at both streams with S-MM44 receiving an extension request approval. The LEI submitted Agency Compliance Forms (PARs #980 and #981) on 7/19/2024. A Notice of Force Majeure Declaration was submitted to the VADEQ on 7/28/2024. **Refer to Sections VI. and VII. for further discussion.**

On 7/21/2024, the EIs observed four off right of way sediment impacts up to 20 feet within upland areas west of Jacks Creek Road. On 7/20/2024, strong storm events caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #988) on 7/21/2024. **Refer to Section VI. for further discussion.**

On 7/22/2024, the EI observed an off right of way sediment impact approximately 15 feet within an upland area west of Indian Cave Road. On 7/21/2024, a strong storm event coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1003) on 7/22/2024. **Refer to Section VI. for further discussion.**

On 7/23/2024, the EI observed two off right of way sediment impacts up to 60 feet, within upland areas east of Listening Hill Road and west of Ramsey Memorial Road. On 7/22/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. It should be noted that runoff from the permanent waterbar end treatments contributed to the erosion and subsequent off right of way impacts. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the areas stabilized within the required timeframe. One of the items received an extension request approval. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1004) on 7/23/2024. **Refer to Section VI. for further discussion.**

On 7/23/2024, the EIs observed two environmental resource impacts at S-B6 east of Riddle Road and S-A7 west of Listening Hill Road. On 7/22/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. It should be noted that runoff from the permanent waterbar end treatments contributed to the erosion and subsequent stream impacts. At S-B6, runoff from above permanent waterbar end treatments caused erosion on the streambank subsequently depositing sediment into the stream channel. The VADEQ was immediately notified, ESC measures temporarily repaired/maintained, sediment removed, and the area temporarily stabilized within the required timeframe. At S-A7, runoff from the upslope permanent waterbar end treatments caused erosion resulting in the ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures were repaired/enhanced, and sediment removed from the stream channel within the required timeframe via an extension request approval. The LEI submitted Agency Compliance Form (PARs #1005 and #1010) on 7/23/2024. A Notice of Force Majeure Declaration was submitted on 8/2/2024. **Refer to Section VI. for further discussion.**

On 7/25/2024, the EI observed an off right of way sediment impact approximately 60 feet within an upland area east of Chalk Level Road. On 7/23/2024, a strong storm event coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. **Refer to Section VI. for further discussion.**

On 7/25/2024, the EI observed an environmental resource impact at S-OO2 east of Chalk Level Road. On 7/23/2024, a strong storm event coupled with existing saturated conditions caused erosion on the streambank subsequently impacting the stream. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. The LEI submitted an Agency Compliance Form (PAR #1012) on 7/26/2024. A

Notice of Force Majeure Declaration was submitted on 8/2/2024. **Refer to Section VI. for further discussion.**

On 7/29/2024, the EI observed an off right of way sediment impact approximately 5 feet within an upland area west of Riddle Road. On 7/23/2024, a strong storm event coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. **Refer to Section VI. for further discussion.**

On 7/29/2024, the EI observed an environmental resource impact at S-B6 east of Riddle Road. On 7/23/2024, a strong storm event coupled with existing saturated conditions caused the upland slope and streambank to become saturated and subsequently sloughing into the stream. It should be noted that runoff from permanent waterbar end treatments east of the stream contributed to the impact. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the area stabilized within the required timeframe. This area received an extension request approval due to an engineering review and redlines to provide long term slope stabilization. The LEI submitted an Agency Compliance Form (PAR #1013) on 7/29/2024. A Notice of Force Majeure Declaration was submitted on 8/2/2024. **Refer to Section VI. for further discussion.**

On 7/30/2024, the EI observed an environmental resource impact at S-G15 east of Ramsey Memorial Road. On 7/29/2024, storm events coupled with existing saturated conditions and erosion under the SSB caused the streambank to slough into the stream channel. It should be noted that on previous evaluations, the Environmental Auditor communicated concerns regarding this location related to the erosion and the streambank instability. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the areas stabilized within the required timeframe via an extension request approval. As request by the VADEQ, an engineering review was conducted and the ESC plans were redlined on 8/2/2024 to address ongoing erosion issues above the stream. It should be noted that the Environmental Auditor conducted previous evaluations at this location related to the streambank instability and upslope erosion issues. The LEI submitted an Agency Compliance Form (PAR #1015) on 7/30/2024. **Refer to Sections VI. and VII. for further discussion.**

On 8/4/2024, the EI observed an off right of way sediment impact approximately 10 feet within an upland area west of Jacks Creek Road. On 8/3/2024, a strong storm event caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. **Refer to Section VI. for further discussion.**

On 8/4/2024, the EI observed an environmental resource impact at S-H37 west of Jacks Creek Road caused by third party impacts related to continued extensive livestock activity. On 8/3/2024, a strong storm event coupled with damaged ESC measures from livestock activities resulted in streambank erosion subsequently impacting the stream. The VADEQ was immediately notified, sediment removed, ESC measures repaired/enhanced, and the streambanks restabilized within the required timeframe. A Notice of Force Majeure Declaration was submitted on 8/14/2024. **Refer to Section VI. for further discussion.**

On 8/10/2024, the EIs observed three environmental resource impacts at S-B6 east of Riddle Road, W-H17 east of Highway 40, and S-H37 west of Jacks Creek Road. From 8/7/2024 through 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby caused ESC and SWM measures to become overwhelmed. At S-B6, continued issues related to runoff from permanent waterbar end treatments east of the stream caused the streambank to slough resulting in a sediment impact to the stream. The VADEQ was immediately notified, temporary ESC and SWM measures repaired/maintained, and sediment removed from the stream within the required timeframe. It should be noted that due to redundant impacts at this location, extension requests were approved by the VADEQ until permanent repairs could be conducted. The LEI submitted an Agency Compliance Form (PAR #1022) on 8/10/2024. On 8/19/2024, a permanent waterbar was extended across the right of way

above S-B6 and permanent repairs/enhancements completed. At W-H17, off right of way run-on caused severe erosion within the right of way. This event caused ESC and SWM measures to become damaged resulting in sediment impacts to the wetland. The VADEQ was immediately notified, ESC and SWM measures repaired/enhanced, and sediment removed from W-H17 within the required timeframe. Based on previous issues related to the off right of way run-on at this location, the Environmental Auditor recommended installing soil stabilization matting (SSM) within a draw across the right of way. The LEI submitted an Agency Compliance Form (PAR #1023) on 8/10/2024. At S-H37, heavy rainfall coupled with damaged ESC and SWM measures from livestock activities caused streambank erosion resulting in a sediment impact to the stream. The VADEQ was immediately notified, ESC and SWM measures repaired/enhanced, and sediment removed from the stream within the required timeframe. The LEI submitted an Agency Compliance Form (PAR #1024) on 8/10/2024. A Notice of Force Majeure Declaration for all three impacts was submitted on 8/19/2024. **Refer to Section VI. for further discussion.**

On 8/12/2024, the EI observed an environmental resource impact at S-G18 east of Timber Ridge Road. From 8/7/2024 through 8/8/2024, a storm event from Tropical Storm Debby with intervals of high intensity/short duration rainfall caused streambank erosion resulting in the stream impact. The VADEQ was immediately notified, the streambank regraded, ESC measures repaired/enhanced, and sediment removed from the stream within the required timeframe. The LEI submitted Agency Compliance Form (PAR #1025) on 8/12/2024. A Notice of Force Majeure Declaration was submitted on 8/19/2024. **Refer to Section VI. for further discussion.**

On 9/19/2024, the EI observed an off right of way sediment impact approximately 50 feet within an upland area east of Ramsey Memorial Road. On 9/18/2024, a storm event from a tropical system caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, temporary ESC measures installed, sediment removed, the area stabilized. It should be noted this impact was caused by upslope runoff due to topographic conditions and permanent waterbar end treatments. Due to redundant ESC measures repair/maintenance at this location, an engineering review is underway to implement ESC and SWM enhancements. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (PAR #1047) on 9/19/2024. **Refer to Section VI. for further discussion.**

On 9/25/2024, the EI observed an environmental resource impact at S-G13 east of Ramsey Memorial Road. From 9/24/2024 into early 9/25/2024, strong storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, sediment removed, ESC measures temporarily repaired, and the streambank stabilized. Based on a field evaluation conducted by the Environmental Auditor on 9/26/2024, it appeared this impact was caused by upslope runoff due to topographic conditions and permanent waterbar end treatments. Due to the redundant issues identified on 9/19/2024, an enhanced stabilization plan is being developed for this area. The LEI submitted an Agency Compliance Form (PAR #1052) on 9/25/2024. The MVP Environmental staff is preparing a Notice of Force Majeure Declaration. **Refer to Section VI. for further discussion.**

On 9/26/2024, the LEI and Environmental Auditor observed an off right of way sediment impact approximately 100 feet within upland area east of Ramsey Memorial Road. The impact was caused by redundant issues identified on 9/19/2024 and 9/25/2024. Due to ongoing issues on the slope, the Environmental Auditor provided recommendations and redlines are currently being developed to enhance ESC measures and extend waterbars across the full width of the right of way (pending VADEQ approval). The EI observed an off right of way impact approximately 20 feet within an upland area east of Armstrong Road. On 9/25/2024, a strong storm event coupled with previous rainfall and saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, temporary ESC measures installed, sediment removed, and the areas stabilized at both locations within the required timeframe. No environmental resources were impacted. The LEI submitted Agency Compliance Forms (PARs #1061 and #1062, respectively) on 9/26/2024. **Refer to Section VI. for further discussion.**

On 9/28/2024, the EI observed an environmental resource impact at S-II9 east of House Rock Road. On 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions caused a slope to slough and ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the streambank stabilized within the required timeframe. It should be noted that an engineering review is underway to develop enhanced stabilization measures due to redundant issues occurring on the slope. The LEI submitted an Agency Compliance Form (Problem Area Report #1069) on 9/28/2024. The MVP Environmental staff is preparing a Notice of Force Majeure Declaration.

During the Q3 reporting period all items provided on the punchlist were communicated between the Spread I Environmental inspection staff and contractor Environmental staff and addressed within the VADEQ approved timeframe (24 hours/Three Days or as extended by VADEQ authorization). **Refer to the respective Bi-Weekly Reports for further detailed information.**

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

**Table I-1A**

Spread I Environmental Inspector Observations: July 1, 2024 – September 30, 2024					
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 2024	*370	10	35	26	0
August 2024	*239	5	1	22	0
September 2024	*230	2	3	23	1

\* Includes Carry Over Items

The EIs conducted a total of 430 SWPPP inspections and provided respective VSIRs throughout the Q3 reporting period. Upon review of the SWPPP VSIRs, it appears that the EIs observations were documented within the daily MVP Punchlists, 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). However, one daily MVP Punchlist item was exceeded between 8/2/2024 and 8/16/2024. It should be noted that SWPPP inspections were postponed on 8/8/2024, 8/9/2024, 9/17/2024, and 9/27/2024 due to hazardous conditions related to weather events and the VADEQ was immediately notified. **Refer to Sections VI. and VII. for further discussion.**

While conducting SWPPP inspections throughout the Q3 reporting period the Spread I Environmental inspection staff noted environmental resource impacts caused by upstream third party activities at S-C4 and S-C3 west of Lark Drive. On 7/1/2024, 7/11/2024 and 7/16/2024, the EI observed milk (dairy) impacts to S-C4 and S-C3 due to upslope dairy farm operations. On 8/5/2024, the EI observed sediment deposition from upstream third party activities within S-CC16, S-G3, S-G4, and S-G6 east of Snowberry Road following a strong storm event on 8/4/2024. On 8/14/2024, the EI observed sediment deposition from upstream third party activities at S-MM8, S-CC8, S-CC9, and S-CC10 east of Toshes Road following precipitation from remnants of Tropical Storm Debby that occurred from 8/7/2024 through 8/8/2024. No project related impacts were observed at the time of the inspections in these areas.

The Spread I Environmental inspection staff conducted ODCP inspections at Laydown Yard 045/046 throughout a portion of the Q3 reporting period. Fourteen inspections were conducted in July. On 7/17/2024, refueling operations ceased at the laydown yard and the fuel storage units were removed. No spills were observed during the ODCP inspections on Spread I throughout the Q3 reporting period.

An approximate total of 27 recordable precipitation events occurred during the Q3 reporting period. On 7/4/2024, strong storm events with high intensity/short duration rainfall produced approximately 2.1 inches of rainfall in three hours. The storm events caused ESC and SWM measures to become overwhelmed resulting in 25 off right of way impacts within upland areas and three environmental resource impacts at S-CD8, S-AB8, and S-DD3. Two of the off right of way impacts were observed by the

EIs on 7/5/2024. Twenty-three of the off right of way impacts and environmental resource impacts were observed by the EIs on 7/6/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

On 7/18/2024, strong storm events with high intensity/short duration rainfall produced approximately 1.3 inches of rainfall in 0.5 hours. The events caused ESC measures to become overwhelmed resulting in one off right of way impact within an upland area and two environmental resource impacts at S-MM44 and S-SS8. The EIs and Environmental Auditor observed the impacts on 7/19/2024. **Refer to discussion above, Table I-1B, Section VI., and Section VII. for further discussion.**

On 7/20/2024, strong storm events with high intensity/short duration rainfall produced approximately 1.3 inches of rainfall in one hour. This event caused ESC measures to become overwhelmed resulting in four off right of way impacts within upland areas. The EIs observed the impacts on 7/21/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

On 7/21/2024, a strong storm event produced approximately 1.1 inches of rainfall in one hour. This event coupled with existing saturated conditions caused ESC measures to become overwhelmed resulting in an off right of way impact within an upland area. This impact was observed by the EI on 7/22/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

On 7/22/2024, storm events produced approximately 1.3 inches of rainfall in one hour. The storms coupled with existing saturated conditions caused ESC measures to become overwhelmed resulting in two off right of way impacts within upland areas and two environmental resource impacts at S-B6 and S-A7. The impacts were observed by the EIs on 7/23/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

On 7/23/2024, a strong storm event produced approximately 1.1 inches of rainfall in two hours. The storm coupled with previous rainfall and saturated conditions caused ESC measures to become overwhelmed resulting in two off right of way impacts within upland areas and two environmental resource impacts at S-OO2 and S-B6. The impacts were observed by the EIs on 7/23/2024 and 7/25/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

On 7/29/2024, storm events produced approximately one inch of rainfall in two hours. This event coupled with existing saturated conditions and erosion occurring under the soil stabilization blanket caused the S-G15 streambank to slough into the stream. The EI observed this impact on 7/30/2024. **Refer to discussion above, Table I-1B, Section VI., and Section VII. for further discussion.**

On 8/3/2024, a strong storm event produced approximately 1.4 inches of rainfall in one hour. The storm coupled with existing saturated conditions caused ESC measures to become overwhelmed resulting in one off right of way impact within an upland area and one environmental resource impact at S-H37. The impacts were observed by the EIs on 8/4/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

From 8/7/2024 through 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby produced approximately 4.4 inches in 24 hours. This event caused ESC and SWM measures to become overwhelmed resulting in four environmental resource impacts at S-B6, W-H17, S-H37, and S-G18. The EIs observed these impacts on 8/10/2024 and 8/12/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

On 9/18/2024, a storm event from a tropical system produced approximately 2.6 inches of rainfall in 1.5 hours. This event coupled with saturated conditions caused ESC measures to become overwhelmed resulting in an off right of way impact within an upland area. The impact was observed by the EI on 9/19/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

From 9/24/2024 into 9/25/2024, strong storm events produced approximately 2.8 inches of rainfall in 12 hours. This event coupled with previous rainfall and saturated conditions caused ESC measures to become overwhelmed resulting in an environmental resource impact at S-G13. The EI observed the impact on 9/25/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**



On 9/25/2024, a strong storm event produced approximately 2.2 inches of rainfall in two hours. This event coupled with previous rainfall and saturated conditions caused ESC and SWM measures to become overwhelmed resulting in two off right of way impacts within upland areas. The EIs observed the impacts on 9/26/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

From 9/26/2024 through 9/27/2024, storm events leading up to and including remnants from Hurricane Helene produced approximately 2.5 inches of rainfall in 48 Hours. These events coupled with previous rainfall and saturated conditions caused a slope to slough which overwhelmed the ESC measures resulting in an environmental resource impact to S-II9. The EI observed the impact on 9/28/2024. **Refer to discussion above, Table I-1B, and Section VI. for further discussion.**

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

**Table I-1B**

Spread I Precipitation and Duration Rates: July 1, 2024 – September 30, 2024					
July		August		September	
Date Recorded	Precipitation and Approximate Duration	Date Recorded	Precipitation and Approximate Duration	Date Recorded	Precipitation and Approximate Duration
7/1/2024	0.0"-1.2" - .5 Hours *Isolated storms with high intensity/short duration rainfall occurred on 6/30/2024	8/3/2024	0.0"-0.7" - 2 Hours *Isolated storm events occurred on 8/2/2024	9/1/2024	0.1"-1.6" - 36 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred on 8/30/2024 and 8/31/2024
7/5/2024	0.2"-2.1" - 3 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred late on 7/4/2024	8/4/2024	0.25"-2.0" - 1 Hour *Scattered storm events with areas of high intensity/short duration rainfall occurred on late 8/3/2024	9/3/2024	0.0"-0.8" - 12 Hours Isolated precipitation with locations receiving high intensity/short duration rainfall occurred on 9/2/2024
7/6/2024	0.0"-0.7" - 4 Hours *Scattered storm events with intervals of high intensity/short duration rainfall occurred on 7/5/2024	8/8/2024 and 8/9/2024	1.8"-4.4" - 36 Hours *A storm event from Tropical Storm Debby began on 8/7/2024 and continued through late 8/8/2024	9/17/2024	0.4"-2.0" - 12 Hours *Storm events with areas receiving high intensity/short duration rainfall began on 9/16/2024
7/13/2024	0.0"-0.9" - 2 Hours *Isolated storm events with high intensity/short duration rainfall occurred on 7/12/2024	8/19/2024	0.0"-0.75" - 48 Hours *Scattered rainfall occurred on 8/17/2024 and 8/18/2024	9/18/2024	0.7"-3.5" - 36 Hours *A storm event from a tropical system with intervals of high intensity rainfall occurred from 9/17/2024 through 9/18/2024
7/18/2024	0.1"-0.25" - 2 Hours *Scattered storms occurred on 7/17/2024	8/30/2024	0.0"-2.8" - 12 Hours *Scattered strong storms occurred on 8/29/2024	9/19/2024	0.2"-2.6" - 1.5 Hours *A strong storm event from a tropical system with locations receiving high intensity/short duration rainfall occurred late on 9/18/2024
7/19/2024	0.3"-1.3" - .5 Hours *Strong storms occurred on 7/18/2024			9/20/2024	0.0"- 0.3" - 1 Hour *Isolated strong storms occurred on late 9/20/2024
7/21/2024	0.3"-1.3" - 1 Hour *Strong storm events occurred on 7/20/2024			9/25/2024	0.8"-3.6" - 24 Hours *Strong storm events with heavier intensity throughout a 12 hour period occurred from 9/24/2024 into 9/25/2024

Spread I Precipitation and Duration Rates: July 1, 2024 – September 30, 2024					
July		August		September	
Date Recorded	Precipitation and Approximate Duration	Date Recorded	Precipitation and Approximate Duration	Date Recorded	Precipitation and Approximate Duration
7/22/2024	0.2"-1.4" - 1 Hour *A strong storm event occurred on 7/21/2024			9/26/2024	0.6"-2.2" - 12 Hours *A strong storm event with intervals of high intensity short duration rainfall occurred throughout 9/25/2024
7/23/2024	0.0"-0.75" - 2 Hours *Scattered storm events occurred on 7/22/2024			9/27/2024	0.2"-1.3" - 24 Hours *A storm event from remnants of Hurricane Helene began on 9/26/2024
7/24/2024	0.5"-1.1" - 2 Hours *Scattered storm events occurred on 7/23/2024			9/28/2024	0.4" - 2.0" - 24 Hours *A storm event from remnants of Hurricane Helene with intervals of high intensity/short duration rainfall continued through 9/27/2024
7/30/2024	0.0"-1.0" - 12 Hours *Isolated storm events occurred on 7/29/2024			9/30/2024	

#### IV. Quarterly Summary of VADEQ Observations

Per Table I-1C, the VADEQ Inspectors observed a total of 82 items requiring repair/maintenance throughout the Q3 reporting period. The Environmental Auditor noted four items identified by the VADEQ as ESC measures damaged due to third party impacts related to unauthorized traffic throughout the Q3 reporting period. During the Q3 reporting period, the VADEQ identified one environmental resource impact at S-OO2 east of Chalk Level Road. The items provided on the daily MVP Punchlists throughout the Q3 reporting period were communicated to the contractor staff and most items were addressed within the VADEQ approved timeframe (24 hours/Three Days or as extended by VADEQ authorization). However, one item exceeded the three day timeframe requirement without receiving an approved extension request. **Refer to Table I-1C, Sections VI. and VII., and the respective Bi-Weekly Reports for further detailed information.**

On 8/16/2024, the VADEQ inspector identified an environmental resource impact at S-OO2 east of Chalk Level Road. Third party foot traffic damaged the ESC measures and caused an area of the streambank to slough resulting in a sediment impact to the stream. The streambank was regraded, ESC measures repaired/enhanced, and sediment removed from the stream within the required timeframe. The LEI submitted Agency Compliance Form (PAR #1029) on 8/16/2024. The MVP Environmental staff submitted a Notice of Force Majeure Declaration on 8/26/2024.

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

**Table I-1C**

Spread I VADEQ Observations: July 1, 2024 – September 30, 2024					
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 2024	*25	0	0	0	0
August 2024	*28	1	0	2	0
September 2024	*29	0	0	2	0

\* Includes Carry Over Items

## **V. Quarterly Summary of Landowner/Third Party Issues**

The Environmental Auditor noted no formal landowner/third party complaints submitted to the VADEQ for the Spread I Project during the Q3 reporting period.

## **VI. Quarterly Summary of Environmental Auditor Observations and Recommendations**

Per Table I-1D, the Environmental Auditor conducted 77 site evaluations during the Q3 reporting period and observed locations where ESC measures required 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, SWM, and Pollution Prevention measures throughout the project for proper installation and functionality. The Environmental Auditor also reviewed and provided recommendations related to daily MVP Punchlists and SWPPP VSIRs. The Environmental Auditor communicated technical and administrative observations and recommendations to the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff. Installation and repair/maintenance recommendations were forwarded to the contractor Environmental staff by the Spread H Environmental inspection staff and most recommendations were subsequently addressed.

During the Q3 reporting period, the Environmental Auditor evaluated locations throughout the right of way where final cleanup and permanent restoration activities were occurring. The Environmental Auditor focused on proper installation of the ESC measures, SWM measures (right of way and access roads), and site restoration implementation. The Environmental Auditor also conducted evaluations at locations where off right of way and environmental resource impacts occurred throughout the Q3 reporting period. The Environmental Auditor communicated/coordinated with the onsite EIs and LEI on a continued basis to ensure permanent restoration activities were conducted in accordance with the required ESC Plans, SWM Plans and AS&S requirements. The Environmental Auditor frequently communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations and recommendations related to conducting proper mulching operations to achieve uniform coverage at the required rates, properly installing SSB, and recognizing locations where concentrated flow resulted in erosive conditions and implementing enhanced ESC measures at such locations. The Environmental Auditor also communicated with the LEI regarding relevant documentation related to SWPPP VSIRs, daily MVP Punchlists, ODCP Inspection reports, and Agency Compliance Forms (PARs).

The Environmental Auditor provided the following detailed technical and administrative/documentation recommendations:

### **Technical Recommendations**

- Repair rills/gullies prior to conducting stabilization activities.
- Ongoing communication to install SSB where straw/hydraulic mulch are not effective measures per Section 3.2 of the AS&S requirements. Areas of concern where concentrated runoff has caused erosion are along the inside edge of perimeter sediment controls on slopes, below waterbar end treatments, areas where rills/gullies have formed, and areas where sheet flow transitioned to concentrated flow conditions. Install SSM in locations where flow and velocity conditions exceed the specifications for SSB.
- Upgrading SSB throughout locations where the previously installed SSB is not an ineffective measure per Section 3.2 of the AS&S due to slope, concentrated flow conditions, and limited functional longevity.
- Ongoing communication to properly install SSB related to anchoring and stapling.
- Evaluate and repair compost filter sock (CFS) where undermining was observed.
- Install SSB and check dams along the inside edge of perimeter sediment controls on slopes where concentrated runoff could potentially cause erosive conditions.

- Monitor temporary bridge crossings during active construction activities and enhance ESC measures as necessary.
- Evaluate vegetative growth throughout the right of way and restabilize locations where there is minimal to no vegetative growth. The stabilization process should entail the addition of lime and fertilizer as necessary. The Environmental Auditor also suggested to the LEI, Chief EI, and MVP Environmental staff to consider additional soil amendments to provide sustainable soil fertility. Soil fertility and pH testing is recommended to determine appropriate application rates.

#### **Administrative/Documentation Recommendations**

- Conduct QA/QC to ensure consistency and thoroughness between the daily MVP Punchlists and SWPPP VSIRs.
- Update the off right of way Sediment Tracker data and submit Agency Compliance Forms to the Environmental Auditor following an off right of way/environmental resource impact.
- Communicate third party/landowner complaints, off right of way impacts, and environmental resource impacts to the Environmental Auditor.

The Environmental Auditor continued to communicate concerns related to areas of the right of way where mulch applied during the Q2 2024 reporting periods did not meet Section 3.2 of the AS&S due to observations related to extensive erosion and off right of way sediment impacts following storm events. The Environmental Auditor provided recommendations to install Soil Stabilization Blanket (SSB) or Soil Stabilization Matting (SSM) and enhanced ESC measures as necessary to minimize ongoing and potential erosion and sediment impacts.

On 7/11/2024, the Environmental Auditor conducted evaluations east and west of Ramsey Memorial Road where the EIs observed off right of way impacts and an environmental resource impact at S-DD3 on 7/5/2024 and 7/6/2024. The Environmental Auditor observed locations where the ESC measures were repaired/enhanced, sediment removed, and the impacted areas stabilized. Recommendations were provided to install enhanced ESC measures in locations where runoff was concentrated along the inside edge of the perimeter sediment controls, installing SSB within areas of concentrated flow and on slopes greater than 3:1 where straw mulch was applied. The Environmental Auditor communicated observations related to the S-G15 streambank sloughing and erosion occurring under the SSB.

On 7/17/2024, the Environmental Auditor conducted evaluations west of Snow Creek Road where the EI observed an off right of way impact on 7/6/2024. The Environmental Auditor observed the ESC measures repaired, off right of way sediment removed, and the area stabilized. However, erosion was observed under straw mulch and the SSB at the time of the evaluation. A recommendation was provided to repair the erosion and install SSB in areas of concentrated flow to meet Section 3.2 of the AS&S requirements. The Environmental Auditor conducted a follow up evaluation on 8/20/2024 and observed the erosion repaired and SSB properly installed.

On 7/19/2024, the Environmental Auditor conducted an evaluation east of Indian Cave Road where the EI observed an environmental resource impact at S-MM44 on that day. At the time of the evaluation, the Environmental Auditor observed sediment removal was pending from approximately 100 feet of the stream channel, undermining of the CFS and SSB upslope of the stream, and locations where SSB was not properly installed. It should be noted that the Environmental Auditor conducted an evaluation at this location on 7/5/2024 and observed a location where SSB was not installed and several locations where the SSB was not properly installed per the ESC Plan requirements. The observations were communicated with the LEI, Chief EI, EC, and Environmental staff. On 8/1/2024 the Environmental Auditor conducted a follow up evaluation and observed the sediment removed from S-MM44, impacted areas stabilized, and most ESC measures repaired. However, undermining at the CFS below waterbar end treatments and locations where the SSB was not properly installed was observed. On 8/7/2024, the Environmental Auditor evaluated the slope above S-MM44 and observed additional/enhanced ESC measures installed and continued to recommend properly anchoring the SSB. On 9/16/2024, the Environmental Auditor conducted an evaluation and observed the ESC and SWM measures installed and functional. **Refer to Section VII. for further discussion.**

On 7/19/2024, the Environmental Auditor conducted an evaluation at locations east of Bar Ridge Road where the EI observed off right of way impacts and environmental resource impacts at S-CD8 and S-AB8 on 7/6/2024. The Environmental Auditor observed ESC measures repaired/maintained, sediment removed, and the impacted areas stabilized. Recommendations were communicated to install enhanced ESC measures in locations where runoff was concentrated along the inside edge of the perimeter sediment controls and to install SSB within areas of concentrated flow and on slopes greater than 3:1 where hydraulic applications were conducted to comply with Section 3.2 of the AS&S. Additionally, in areas where hydraulic applications were conducted that developed areas of concentrated flow, recommended installation of appropriate grade SSB to address erosive conditions. While conducting the evaluation, the Environmental Auditor observed a sediment impact to S-SS8 due to severe erosion under the SSB above the stream. The Environmental Auditor communicated the observations and provided a recommendation to enhance the SSB in this area as the current SSB was no longer an effective measure per Section 3.2 of the AS&S. On 8/7/2024, the Environmental Auditor conducted a follow up evaluation and observed the sediment removed from S-SS8 and enhanced ESC measures installed and functional.

On 7/23/2024, the Environmental Auditor conducted evaluations west of Jacks Creek Road where off right of way sediment impacts were observed by the EI on 7/21/2024. The Environmental Auditor observed the ESC measures repaired, sediment removed, and the areas stabilized. It should be noted that these locations along with S-H37 have been subjected to continuous livestock traffic.

On 8/1/2024, the Environmental Auditor conducted an evaluation east of Ramsey Memorial Road where an off right of way impact and environmental resource impact at S-G15 were observed by the EI on 7/30/2024. The Environmental Auditor observed the S-G15 streambank repaired and stabilized. It should be noted the Environmental Auditor evaluated S-G15 east of Ramsey Memorial Road on 7/11/2024 and 7/17/2024 and observed the west streambank showing signs of sloughing and erosion under the SSB directly above the streambank. The Environmental Auditor communicated these concerns to the Spread I Environmental inspection staff, Chief EI, and MVP Environmental staff immediately following the evaluations. The upland ESC measures were repaired/maintained, sediment removed, and the area stabilized. Based on the evaluation of this location and where severe erosion occurred within a natural drainage feature east of S-G15, the Environmental Auditor provided recommendations to install enhanced runoff control and ESC measures to minimize potential future off right of way and environmental resource impacts. The Environmental Auditor coordinated with the engineer and as requested by the VADEQ, redlines were submitted on 8/2/2024. The EI conducted a follow up evaluations on 8/7/2024, 8/20/2024, 9/16/2024, and 9/26/2024. The Environmental Auditor did not observe any off right of way impacts or environmental resource impacts at S-G15. However, on 9/26/2024, the Environmental Auditor observed erosion occurring on the slope west of S-G15 and throughout the natural drainage feature east of the stream. The Environmental Auditor reviewed the areas of concern onsite with the LEI on 9/26/2024 and noted that the recommended redline revisions to the ESC Plans for both locations be implemented to address this conditions. The Environmental Auditor will continue to monitor these locations throughout Q4 2024. **Refer to Section VII. for further discussion.**

On 8/1/2024, the Environmental Auditor conducted evaluations east of Chalk Level Road where the EI observed an off right of way impact and environmental resource impact at S-OO2 on 7/25/2024. The Environmental Auditor observed the ESC measures repaired/maintained, sediment removed, and the impacted areas stabilized. A recommendation was provided to enhance the SSB on the S-OO2 streambank and slopes above the stream as the current SSB did not appear to be an effective measure per Section 3.2 of the AS&S.

On 8/1/2024, the Environmental Auditor conducted an evaluation east of Riddle Road where the EI observed environmental resource impacts at S-B6 on 7/23/2024 and 7/29/2024. The Environmental Auditor observed the sediment removed and temporary ESC measures installed and functional. The Environmental Auditor evaluated the permanent waterbars and end treatments on the slope east of the stream and it appeared that runoff from these structures contributed to the impacts at S-B6. On 8/20/2024, the Environmental Auditor conducted a follow up evaluation and observed a permanent waterbar above S-B6 extended fully across the right of way and final restoration activities occurring on the

streambank. On 9/20/2024, the Environmental Auditor conducted a follow up evaluation and observed the ESC and SWM measures installed and functional. A recommendation was provided to monitor the S-B6 west streambank as there appeared to be minimal to no vegetative growth and the SSB was degrading.

On 8/1/2024, the Environmental Auditor conducted an evaluation west of Listening Hill Road where the EI observed an off right of way impact and environmental resource impact at S-A7. The Environmental Auditor observed the ESC and SWM measures repaired/enhanced, sediment removed, and the areas stabilized. Based on the evaluation at S-A7, it appeared that runoff from the upslope permanent waterbar end treatments contributed to the impact. A recommendation was provided to enhance the SSB within the upland location where the off right of way impact occurred as the current SSB did not appear to be an effective measure per Section 3.2 of the AS&S. On 9/16/2024, the Environmental Auditor conducted a follow up evaluation and observed the ESC measures installed and functional.

On 8/20/2024, the Environmental Auditor conducted an evaluation east of Timber Ridge Road where the EI observed an environmental resource impact at S-G18 on 8/12/2024. The Environmental Auditor observed the ESC measures repaired/enhanced, the streambank stabilized, and sediment removed from the stream.

On 8/20/2024, the Environmental Auditor conducted evaluations east of Highway 40 and west of Jacks Creek Road where the EIs observed two environmental resource impacts at S-H37 on 8/4/2024 and 8/10/2024 and an environmental resource impact at W-H17 on 8/11/2024. At S-H37 the Environmental Auditor observed the ESC and SWM measures repaired/enhanced, the streambank stabilized, and sediment removed from S-H37. On 9/26/2024, the Environmental Auditor conducted a follow up evaluation and observed most ESC and SWM measures installed and functional. It should be noted that during the evaluations, the Environmental Auditor observed continued damage to the ESC and SWM measures due to active livestock activity throughout this area. Recommendations were provided to conduct ESC measures repair/maintenance, monitor the streambanks, and enhance ESC measures as needed. It should also be noted that the Environmental Auditor communicated and observation related to channel incision occurring over the pipeline centerline. At W-H17, the Environmental Auditor observed the ESC and SWM measures repaired/replaced, sediment removed, and the area stabilized. A recommendation was provided to consider implementing enhanced ESC measures throughout this location due to previous off right of way run-on issues.

On 8/21/2024, 9/9/2024, and 9/24/2024 the Environmental Auditor conducted evaluations on the steep slope above S-II9 east of House Rock Road. Based on previous evaluations, heavy rainfall events caused an area of the slope to slough due to steep/complex topographic conditions with prolonged periods of saturation. The Environmental Auditor observed the contractor staff conducting ESC measures repairs/enhancements throughout the Q3 reporting period. Based on communication with the Spread I Environmental and the MVP Environmental staff, an engineering review is currently underway to implement enhanced slope protection measures. The Environmental Auditor will continue to evaluate this location throughout the Q4 2024 reporting period.

On 9/26/2024, the Environmental Auditor met with the LEI onsite east of Ramsey Memorial Road where the EI observed an off right of way impact on 9/19/2024 and an environmental resource impact at S-G13 on 9/25/2024. At the time of the evaluation, the contractor staff was mobilizing to conduct repairs and sediment removal at S-G13. The LEI and Environmental Auditor observed an off right of way impact within an upland area while evaluating the slope east of the stream. No environmental resource impacts were observed. The Environmental Auditor observed temporary ESC measures reinstalled throughout the slope; however, severe erosion was observed under the SSB and throughout areas of the slope. Based on the evaluation, it appeared that runoff from upslope permanent waterbar end treatments coupled with a topographic draw is causing the severe erosion resulting in the off right of way and environmental resource impacts. On 9/29/2024, the Environmental Auditor coordinated with the engineer and LEI to develop redlines that entail regrading the slope, extending the permanent waterbars across the right of way, and installing enhanced ESC measures. The Environmental Auditor will continue to evaluate this location throughout the Q4 2024 reporting period.

Based on communication, internal feedback, VADEQ extension request denials (8/1/2024, 8/6/2024, and 8/15/2024), and daily MVP Punchlist items exceeding timeframe requirements, the contractor was not adequately staffed to address the daily MVP Punchlist items from 7/22/2024 through 8/15/2024. Per extension request email responses from the VADEQ, approximately 29 items were not completed within the required timeframe. No 24 Hour timeframe requirements and no daily MVP Punchlist items for off right of way/environmental resource impacts were exceeded. The Environmental Auditor communicated with the MVP Environmental staff and Chief EI and was informed that additional contractor personnel were added to the project. The following should be noted: no extension requests were submitted for three items where the three day timeframe requirement expired and extension requests for Punchlist items were submitted but did not receive timely responses to the requests. This resulted in a brief period of non-compliance before a response from the agency was received approving extension requests. It should also be noted that Environmental inspection staff changes occurred throughout the Q3 reporting period. **Refer to Section VII. for further discussion.**

The Spread I Environmental inspection staff, contractor Environmental staff, Chief EI, and Environmental Auditor continue to monitor locations throughout the right of way and communicate/coordinate to repair/maintain and implement additional (enhanced) ESC/SWM measures as necessary. The Environmental Auditor continues to communicate with the LEI, Environmental Coordinator, Assistant LEI, Chief EI, and MVP Environmental staff on a regular basis. Discussions entail project feedback, technical support, and recommendations/guidance to maintain compliance with the Annual Standards and Specifications.

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

**Table I-1D**

<b>Environmental Auditor Field Observations: July 1, 2024 – September 30, 2024</b>	
<b>Month</b>	<b>Total Observations</b>
July 2024	19
August 2024	25
September 2024	33

## **VII. Conclusion(s)**

Per Section IV. (b) (1) of the Consent Decree the Environmental Auditor conducted site evaluations, evaluated daily MVP Punchlists, ODCP Inspection reports, SWPPP VSIRs, communicated with the Spread I Environmental inspection staff, contractor Environmental staff, Chief EI, and the MVP Environmental staff and has concluded the following for the Spread I Project:

- The Best Management Practices for the Project have been implemented in accordance with MVP's Project Specific Annual Standards and Specifications, Erosion and Sediment Control Plans, and Stormwater Management plans;
- The ESC measures were properly installed, inspected, and maintained; however, the following issues occurred:
  - On 7/5/2024, the Environmental Auditor communicated concerns regarding improperly installed ESC measures above S-MM44. On 7/19/2024, the Environmental Auditor evaluated an environmental resource impact to S-MM44 and observed the ESC measures not repaired/maintained which subsequently contributed to the impact;
  - On 7/11/2024 and 7/17/2024, the Environmental Auditor communicated concerns regarding the streambank above S-G15 showing signs of sloughing. On 7/30/2024, the EI observed an environmental resource impact due to the bank sloughing into the stream;

- All ineffective temporary ESC measures observed by the Environmental Inspectors 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. However, the following issue occurred:
  - From 7/22/2024 through 8/15/2024 the contractor was not adequately staffed to address the daily MVP Punchlist items to meet the required timeframes. As a result, 29 daily MVP Punchlist items were not completed within the required timeframes.

Based on the aforementioned observations, the resources available and deployed in the field (contractor Environmental staff) were not sufficient to conduct routine maintenance and/or repair ineffective ESC measures in a timely manner between 7/22/2024 and 8/15/2024, particularly during periods of severe weather conditions. The Environmental Auditor recommended conducting QA/QC on SWPPP VSIRs and daily MVP Punchlists. The Environmental Auditor also recommended communicating and coordinating with the Environmental inspection staff and contractor to ensure all ESC and SWM measures are properly installed, functional, and enhanced where necessary to maintain compliance with the approved ESC Plans, SWM Plans, and AS&S.

As the VADEQ is aware, there are several instances noted in the Q4 2019 through Q2 2024 Reports in which sediment has left the ROW but MVP's requests for landowner permission to take corrective measures have been denied. Therefore, 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.



MOUNTAIN VALLEY PIPELINE  
SPREAD I  
ENVIRONMENTAL AUDITOR PARTIAL BI-WEEKLY REPORT - 6/30/2024 through 7/7/2024 (BEGINNING OF Q3 2024 REPORTING PERIOD)

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 7/7/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 36 conducted from 7/1/2024 through 7/7/2024 (includes Transco Interconnect Station/H-602/H-603/Laydown Yards)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/1/2024 through 7/7/2024 (includes Carry Over Items from 6/30/2024): 117											
Total Number of ODCP Inspections at Laydown Yard 045/046: 5 (7/1/2024 through 7/3/2024 and 7/5/2024 through 7/6/2024): Holiday on 7/4/2024											
Total Number of VA DEQ Observations from 7/1/2024 through 7/7/2024: 2											
Total Number of Landowner/Third Party Reported Complaints: 0											
Total Number of Right of Way Impacts Caused by Third Parties: 2 (unauthorized traffic and livestock traffic)											
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: 25 (1. and 2. On 7/5/2024, the EIs observed two off right of way sediment impacts within upland areas west of Ramsey Memorial Road. On 7/4/2024, strong storm events with high intensity/short duration rainfall produced approximately 2.1 inches of rainfall in three hours causing ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, sediment removed, and the areas stabilized within the required timeframes. No environmental resources were impacted. 3-25. On 7/6/2024, the EIs observed 23 off right of way sediment impacts within upland areas west of Listening Hill Road, east and west of Bar Ridge Road, west of Ramsey Memorial Road, and east of Snow Creek Road. On 7/4/2024, strong storm events with high intensity/short duration rainfall produced approximately 2.1 inches of rainfall in three hours causing ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted at 18 locations, sediment removed, and the areas stabilized within the required timeframes. Extension requests have been approved by the VADEQ for 5 of the remaining locations until landowner permission is granted. The ESC measures were repaired/maintained at these locations. No environmental resource impacts occurred from 18 of the off right of way impacts; however, three incident areas subsequently impacted S-CD8, S-AB8, and S-DD3). Refer to Environmental Inspector Observations for further discussion.											
Total Number of Environmental Resource Impacts: 3 (1-3. On 7/6/2024, the EIs observed three environmental resource impacts at S-CD8 east of Bar Ridge Road, S-AB8 east of Bar Ridge Road, and S-DD3 west of Ramsey Memorial Road. On 7/4/2024, strong storm events with high intensity/short duration rainfall produced approximately 2.1 inches of rainfall in three hours causing ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, ESC and SWM measures repaired/maintained, sediment removed, and the areas stabilized within the required timeframe. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration). Refer to Environmental Inspector Observations 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 7/1/2024 through 7/7/2024.											
CARRY OVER ITEMS FROM 6/30/2024											
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
2/21/2024		1	1					1 on 2/22, 2/29, and 4/2//2024 to be completed upon engineer review/redlines			One item was identified as an environmental resource impact at S-F11 (Blackwater River) requiring streambank repair due to water flowing from the dewatering facilities to a natural low point just above the streambank resulting in the bank sloughing. Sediment caused by the streambank sloughing was removed below the streambank. A long term extension request has been approved by the VADEQ on 2/29/2024 to conduct streambank repairs upon engineer review/redlines and agency approvals.
2/22/2024		1	1					1 on 2/22, 2/29, and 4/2//2024 to be completed upon verification by the VADEQ Aquatic Biologist			One item was identified as an environmental resource impact at S-C-19 (Maggodee Creek) requiring streambank repair due to water flowing from dewatering facilities to natural low spots and through existing gullies on the S-C19 streambank. Sediment caused by the streambank erosion was removed. The VADEQ required an extension request until an aquatic biologist from the agency confirms sediment removal and streambank stabilization are adequate.
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
7/1/2024	0.0"-1.2" - .5 Hours *Isolated storms with high intensity/short duration rainfall occurred on 6/30/2024	8					8			8 on 7/1/2024	Twenty-eight items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to livestock traffic.
7/2/2024		28				1	28			22 on 7/2/2024 2 on 7/3/2024 4 on 7/5/2024	Twenty-eight items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic.
7/3/2024		10				1	9			10 on 7/3/2024	Ten items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to livestock traffic.
7/5/2024	0.2"-2.1" - 3 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred late on 7/4/2024	21		2			21 (includes off right of way impacts)		1 on 7/5/2024	10 on 7/5/2024 10 on 7/6/2024	Twenty-one items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. Two of the identified items were off right of way sediment impacts up to 50 feet within upland areas west of Ramsey Memorial Road. On 7/4/2024, strong storm events with intervals of high intensity/short duration rainfall caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner permission granted, ESC measures repaired/maintained, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted.
7/6/2024	0.0"-0.7" - 4 Hours *Scattered strong storm events with intervals of high intensity/short duration rainfall occurred on 7/5/2024	48	3	23			48 (includes off right of way and environmental resource impacts)	5 on 7/7/2024 off right of way impacts to be completed upon landowner permission	11 on 7/6/2024 7 on 7/7/2024	17 on 7/7/2024	Forty-eight items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Twenty-three items were identified as off right of way sediment impacts up to 150 feet within upland areas west of Listening Hill Road, east of Bar Ridge Road, west of Ramsey Memorial Road, and west of Snow Creek Road. On 7/4/2024, strong storm events with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC and SWM measures repaired/maintained, sediment removed, and the areas stabilized at 18 locations. Erosion and Sediment Control and SWM measures were repaired/maintained at the remaining five locations and extension requests for 5 of the items and an extension request was approved until landowner permission is granted. No environmental resource impacts occurred from 18 of the off right of way impact locations; however, three incident areas subsequently impacted S-CD8, S-AB8, and S-DD3. The LEI submitted an Agency Compliance Form (Problem Area Report #956) on 7/6/2024. The Environmental Auditor will initiate site evaluations the week of 7/8/2024.  Three of the identified items were environmental resource impacts at S-CD8 east of Bar Ridge Road, S-AB8 east of Bar Ridge Road, and S-DD3 west of Ramsey Memorial Road. On 7/4/2024, strong storm events with high intensity/short duration rainfall caused ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, ESC and SWM measures repaired/maintained, sediment removed, and areas stabilized within the required timeframe. The LEI submitted Agency Compliance Forms (Problem Area Reports #971, #972, and #973) on 7/6/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. The Environmental Auditor will initiate site evaluations the week of 7/8/2024.  In addition to the 5 items that received extension request approvals, 8 items have three days to be 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
7/3/2024		2					2		1 on 7/3/2024	1 on 7/3/2024	Two items were identified requiring Pollution Prevention repair/maintenance (included a small spill) 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			
7/5/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-FR-323 (CIS/GAS), MVP-FR-322 (CIS/GAS), Indian Cave Road (CIS), and MVP-FR-306.04 (GAS).							The Environmental Auditor observed locations where the ESC/SWM and Pollution Prevention measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding the following observations and recommendations: ESC and Pollution Prevention measures repair/maintenance, monitoring and installing soil stabilization blanket (SSB) at areas of the right of way where upslope drainage features discharge onto the right of way, locations where straw mulch has been dislodge due to concentrated flow conditions, a new corrugated HDPE culvert installed within a stream where the gravel/soil fill appeared to be less than 6 inches and the culvert inlet invert elevation was above the bottom of the streambed, and concerns related to proper permanent waterbar and end treatment heights.			
7/1/2024 through 7/7/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread I Project.  During a SWPPP inspection on 7/1/2024, the EI observed sediment impacts to S-C3 and S-C4 west of Lark Drive caused by an upslope third party dairy farm operation.  The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding documentation issues related to SWPPP VSIRs .  The Environmental Auditor communicated with all Spread LEIs on 7/2/2024 regarding the Partial Bi-Weekly reporting period ending on 7/7/2024,							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 I 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 continues to recommend conducting QA/QC on SWPPP VSIRs to ensure documentation is thorough and complete.			
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										

MOUNTAIN VALLEY PIPELINE  
SPREAD I  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 7/8/2024 through 7/21/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 7/21/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>78</b> conducted from 7/8/2024 through 7/21/2024 (includes Transco Interconnect Station/H-602/H-603/Laydown Yards)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/8/2024 through 7/21/2024 (includes Carry Over Items from 7/7/2024): <b>150</b>											
Total Number of ODCP Inspections at Laydown Yard 045/046: <b>6</b> (7/8/2024 through 7/14/2024); <b>3</b> (7/15/2024 through 7/17/2024); <b>All refueling tanks were removed from MVP-LY-046 on 7/17/2024.</b>											
Total Number of VA DEQ Observations from 7/8/2024 through 7/21/2024: <b>6</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>13</b> (livestock traffic, unauthorized traffic, and agricultural equipment traffic)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>5</b> (1. On 7/19/2024, the EI observed an off right of way sediment impact within an upland area west of Listening Hill Road. On 7/18/2024, strong storm events produced approximately inches of 1.3 rainfall in .5 hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures repaired/maintained, landowner access granted, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. 3-5. On 7/21/2024, the EI identified four off right of way sediment impacts within upland areas west of Jacks Creek Road. On 7/20/2024, strong storm events produced approximately 1.3 inches of rainfall in one hour causing ESC measures to become overwhelmed. The VADEQ was immediately notified. The ESC measures repair/maintenance, sediment removal, and stabilization action items have 24 Hours to be completed within the required timeframe. No resources were impacted). <b>Refer to Environmental Inspector Observations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>2</b> (1. On 7/19/2024, the EI observed an environmental resource impact at S-MM44 east of Indian Creek Road. On 7/18/2024, strong storm events produced approximately 1.3 inches of rainfall in .5 hours causing ESC measures to become overwhelmed subsequently impacting 100 feet of S-MM44. The VADEQ was immediately notified. An extension request was submitted to the VADEQ on 7/20/2024 due to wet conditions throughout the right of way. On 7/19/2024, the Environmental Auditor conducted a site evaluation at this location and observed ESC measures improperly installed that included a location directly above S-MM44 where the Environmental Auditor previously communicated the issues on 7/5/2024. <b>Refer to Environmental Inspector Observations, Environmental Auditor Field Observations and Recommendations, and Required Findings and Conclusions for further discussion.</b> 2. On 7/19/2024, the Environmental Auditor observed an environmental resource impact at S-SS8 east of Bar Ridge Road. On 7/18/2024, strong storm events produced approximately 1.3 inches of rainfall in .5 hours causing severe erosion under the soil stabilization blanket (SSB) on the west streambank. The VADEQ was immediately notified, ESC measures repaired/enhanced, and sediment removed from the streambed within the required timeframe. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
On 7/15/2024, the MVP Environmental staff submitted a Final Notice of Force Majeure Declaration to the VADEQ related to environmental resource impacts at S-DD3, S-CD8, and S-AB8. These streams were impacted from a storm event on 7/5/2024 which produced approximately 2.1 inches of rainfall in three hours. Refer to the Environmental Auditor Partial Bi-Weekly Report ending on 7/7/2024 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: <b>0</b>											
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 7/8/2024 through 7/21/2024.											
CARRY OVER ITEMS FROM 7/7/2024											
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
2/21/2024		1	1					1 on 2/22, 2/29, and 4/2//2024 to be completed upon engineer review/redlines			One item was identified as an environmental resource impact at S-F11 (Blackwater River) requiring streambank repair due to water flowing from the dewatering facilities to a natural low point just above the streambank resulting in the bank sloughing. Sediment caused by the streambank sloughing was removed below the streambank. A long term extension request has been approved by the VADEQ on 2/29/2024 to conduct streambank repairs upon engineer review/redlines and agency approvals.
2/22/2024		1	1					1 on 2/22, 2/29, and 4/2/2024 to be completed upon verification by the VADEQ Aquatic Biologist			One item was identified as an environmental resource impact at S-C-19 (Maggodee Creek) requiring streambank repair due to water flowing from dewatering facilities to natural low spots and through existing gullies on the S-C19 streambank. Sediment caused by the streambank erosion was removed. The VADEQ required an extension request until an aquatic biologist from the agency confirms sediment removal and streambank stabilization are adequate.
7/6/2024	0.2"-2.1" - 3 Hours *Scattered thunderstorms with locations receiving high intensity/short duration rainfall occurred late on 7/4/2024 and 0.0"-0.7" - 4 Hours *Scattered storm events with intervals of high intensity/short duration rainfall occurred on 7/5/2024	13		5				5 on 7/7/2024 extended indefinitely until landowner permission is granted	5 on 7/8/2024 (extension requests)	7 on 7/8/2024 1 on 7/9/2024	Thirteen items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Five of the identified items were off right of way sediment impacts within upland areas. On 7/4/2024, strong storms caused ESC measures to become overwhelmed resulting in the off right of way impacts. The VADEQ was immediately notified and ESC measures repaired/enhanced, landowner access granted, sediment removed, and the areas stabilized via an extension request approval. Refer to Environmental Auditor Field Observations and Recommendations (7/11/2024) for further discussion.
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
7/8/2024		18				3	15			12 on 7/9/2024 6 on 7/10/2024	Eighteen items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. Three of the identified items were caused by third party impacts related to unauthorized traffic (2) and agricultural equipment (1).
7/9/2024		16					16			7 on 7/9/2024 9 on 7/10/2024	Sixteen items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/10/2024		21				6	15			12 on 7/10/2024 5 on 7/11/2024 4 on 7/12/2024	Twenty-one items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. Seven of the identified items were caused by third party impacts related to livestock traffic.
7/11/2024		10					10			4 on 7/11/2024 6 on 7/12/2024	Ten items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/12/2024		4					4			4 on 7/12/2024	Four items were identified requiring Pollution Prevention repair/maintenance and completed within the required timeframe.
7/15/2024		3				1	2			2 on 7/15/2024 1 on 7/16/2024	Three items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to livestock traffic.
7/16/2024		3				2	1			3 on 7/16/2024	Three items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. Two of the identified items were caused by third party impacts related to unauthorized traffic.
7/17/2024		5					5			3 on 7/17/2024 2 on 7/18/2024	Five items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.
7/18/2024	0.1"-0.25" - 2 Hours *Scattered storms occurred on 7/17/2024	17				1	17	5 on 7/20/2023 to be completed on 7/23/2024 due to wet conditions		6 on 7/18/2024 5 on 7/19/2024 1 on 7/20/2024	Seventeen items were identified requiring ESC and Pollution Prevention repair/maintenance and 12 were completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic. <b>The five remaining items received an extension request approval due to wet conditions throughout the right of way.</b>

7/19/2024	0.3"-1.3" - .5 Hours *Strong storms occurred on 7/18/2024	34	2	1			34 (Includes off right of way and environmental resources impacts)	1 on 7/20/202 to be completed on 7/23/2024 due to wet conditions (environmental resource impact)	5 on 7/20/2024	3 on 7/20/2024	Thirty-four items were identified requiring ESC and Pollution Prevention repair/maintenance and 8 were completed within the required timeframe. Two items were identified environmental resource impacts at S-MM44 east of Indian Cave Road and S-SS8 east of Bar Ridge Road. On 7/18/2024, strong storm events caused ESC measures to become overwhelmed impacting approximately 100 feet of the S-MM44 stream channel. Severe gully erosion under the SSB on the S-SS8 west streambank impacted the S-SS8 stream channel within the right of way. The VADEQ was immediately notified regarding both environmental resource impacts. The ESC measures were repaired/enhanced and sediment removed from the S-SS8 stream channel within the required timeframe. An extension request was submitted to the VADEQ on 7/20/2024 due to wet conditions where the S-MM44 impact occurred. The LEI submitted Agency Compliance Forms (Problem Area Reports #980 and #981) on 7/19/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. It should be noted that the Environmental Auditor observed ESC measures directly above S-MM44 not properly installed per the required ESC Plans and Annual Standards and Specifications (AS&S). Refer to Environmental Auditor Field Observations and Recommendations and Required Findings and Conclusions for further discussion.  One item was identified as an off right of way sediment impact approximately 15 feet within an upland location west of Listening Hill Road. The strong storm events on 7/18/2024 caused ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures repaired/maintained, landowner access granted, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted.  In addition to the off right of way impact item receiving and extension request approval, twenty-five of the remaining items have three days to be completed within the required timeframe.
7/21/2024	0.3"-1.3" - 1 Hour *Strong storm events occurred on 7/20/2024	4		4			4				Four items were identified requiring ESC repair/maintenance. These items were off right of way sediment impacts up to 20 feet within upland areas west of Jacks Creek Road. On 7/20/2024, strong storm events caused ESC measures to become overwhelmed. The VADEQ was immediately notified and the LEI submitted an Agency Compliance Form (Problem Area Report #988) on 7/21/2024. No environmental resources were impacted.  These items have 24 Hours to be 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
7/10/2024		4					4			4 on 7/11/2024	Four items were identified requiring ESC repair/maintenance and completed within the required timeframe.
7/12/2024		1					1			1 on 7/12/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
7/16/2024		1					1			1 on 7/16/2024	One item was identified requiring ESC 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			
7/11/2024	The Environmental Auditor conducted site evaluations at the following locations: Ramsey Memorial Road (CIS/GIS), Listening Hill Road (CIS), and Bar Ridge Road (GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor evaluated locations where off right of way and environmental resource impacts were identified by the EIs on 7/6/2024. The Environmental Auditor communicated with the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding the following observations and recommendations: conducting repairs and installing soil stabilization blanket (SSB) due to erosion along the perimeter compost filter socks (CFS) on slopes, conducting ESC measures repair/maintenance, a streambank starting to slough, areas of gullies underneath SSB and straw mulch, and monitoring a cross culvert installed across the right of way per previous land use conditions and ensuring the culvert inlet and outlet protection is installed per the ESC Plan requirements.			
7/17/2024	The Environmental Auditor conducted site evaluations at the following locations: Star Land Drive (CIS/GAS), Museville Road (CIS/GAS), Snow Creek Road (CIS), and Ramsey Memorial Road (GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor evaluated locations where off right of way impacts were identified by the EIs on 7/6/2024. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding the following observations and recommendations: conducting repairs and installing SSB) due to erosion along the perimeter compost filter socks (CFS) on slopes, conducting ESC measures repair/maintenance, a streambank appearing to slough, areas of gullies underneath SSB and straw mulch, and sediment build up at a permanent waterbar and end treatment causing runoff to route around this structure resulting in sediment accumulated at perimeter sediment controls directly above a stream. The Environmental Auditor communicated there is a high potential for off right of way and environmental resource impacts where the issues were observed.			
7/19/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-FR-322 (CIS/GAS), Bar Ridge Road (GAS), and MVP-FR-306.04/ATWS-1468.							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor evaluated the right of way at and above S-MM44 (east of Indian Cave Road) where an environmental resource impact was identified by the EI the same day. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding undermining at sediment controls and improperly installed SSB above S-MM44 resulting in rills/gullies subsequently contributing to the environmental resource impact. It should be noted that the Environmental Auditor previously communicated the issues on 7/5/2024. At the time of the evaluation, sediment was not removed from the stream channel. Refer to Required Findings and Conclusions for further discussion. While conducting an evaluation east of Bar Ridge Road, the Environmental Auditor observed a sediment impact to S-SS8 due to runoff causing deep gullies under the SSB. The Environmental Auditor met with the Chief EI and EI to discuss the observations and recommended enhancing the SSB to a higher grade suitable for the given site conditions. The Environmental Auditor evaluated S-CD8 and S-AB8 where environmental resource impacts were observed by the EI on 7/6/2024 due to strong storm events and observed the ESC measures repaired/maintained and the sediment removed from the streambeds. The EA also communicated the following concerns: conducting repairs and installing SSB due to erosion along the perimeter compost filter socks (CFS) on slopes, and rilling on slopes where hydraulic mulch is not an effective measure per Section 3.2 of the AS&S.			
7/8/2024 through 7/21/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists, SWPPP VSIRs, and ODCP reports to be compliant during this reporting period for the Spread I Project.  On 7/11/2024 and 7/16/2024, the EI observed environmental resource impacts to S-C3 and S-C4 caused by milk (dairy) impacts from upslope dairy farm operations west of Lark Drive.  On 7/19/2024, the Environmental Auditor evaluated S-MM44 east of Indian Cave Road where the EI observed an environmental resource impact the same day. On 7/5/2024, the Environmental Auditor communicated concerns related to improperly installed SSB directly above the stream. Based on the evaluation, it appeared that the SSB was not repaired at this location and throughout the right of way above this location. Gullies were observed under the SSB and undermining at sediment controls via concentrated runoff from permanent waterbar end treatments which contributed to the environmental resource impact.  The Environmental Auditor communicated with all Spread LEIs on 7/17/2024 regarding the Bi-Weekly reporting period ending on 7/21/2024. The Environmental Auditor provided continued recommendations to install appropriate ESC measures when straw mulch is rendered ineffective per Section 3.2 of the Annual Standards and Specifications and conduct QA/QC on SWPPP VSIRs to ensure documentation is accurate and thorough.							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 I 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 the LEI communicate ESC measures installation concerns with the Spread I Environmental inspection staff and contractor staff.			
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	On 7/19/2024, the Environmental Auditor evaluated S-MM44 east of Indian Cave Road where the EI observed and environmental resource impact the same day. On 7/5/2024, the Environmental Auditor communicated concerns related to improperly installed SSB directly above the stream. Based on the evaluation, it appeared that the SSB was not repaired at this location and throughout the right of way above this location. Gullies were observed under the SSB and undermining at sediment controls via concentrated runoff from permanent waterbar end treatments which contributed to the environmental resource impact.									
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										

MOUNTAIN VALLEY PIPELINE  
SPREAD I  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 7/22/2024 through 8/4/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 8/4/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS												
Total Number of SWPPP Inspections: <b>72</b> conducted from 7/22/2024 through 8/4/2024 (includes Transco Interconnect Station/H-602/H-603/Laydown Yards); <b>Refer to Environmental Auditor Field Observations and Recommendations for further discussion.</b>												
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 7/22/2024 through 8/4/2024 (includes Carry Over Items from 7/21/2024): <b>171</b>												
Total Number of ODCP Inspections at Laydown Yard 045/046: <b>0; All refueling tanks were removed from MVP-LY-046 on 7/17/2024.</b>												
Total Number of VA DEQ Observations from 7/22/2024 through 8/4/2024: <b>21</b>												
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>												
Total Number of Right of Way Impacts Caused by Third Parties: <b>13</b> (livestock traffic, wildlife traffic, and unauthorized traffic)												
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>												
Total Number of Off Right of Way Impacts: <b>6 (1.</b> On 7/22/2024, the EI observed an off right of way sediment impact within an upland area west of Indian Cave Road. On 7/21/2024, a strong storm event coupled with existing saturated conditions produced approximately 1.1 inches of rainfall in one hour causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. <b>2-3.</b> On 7/23/2024, the EI identified two off right of way sediment impacts within upland areas east of Listening Hill Road and west of Ramsey Memorial Road. On 7/22/2024, a strong storm event with intervals of high intensity/short duration rainfall produced approximately 1.3 inches of rainfall in one hour. This event coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. No environmental resources were impacted. <b>4.</b> On 7/25/2024, the EI identified an off right of way sediment impact within an upland area east of Chalk Level Road. On 7/23/2024, a strong storm event coupled with previous rainfall and saturated conditions produced approximately 1.1 inches of rainfall in two hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. <b>5.</b> On 7/29/2024, the EI observed an off right of way sediment impact within an upland area west of Riddle Road. On 7/23/2024, a strong storm event coupled with previous rainfall and saturated conditions produced approximately 1.1 inches of rainfall in two hours causing ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. <b>6.</b> On 8/4/2024, the EI identified an off right of way sediment impact within an upland area west of Jacks Creek Road. On 8/3/2024, a strong storm event produced approximately 1.4 inches of rainfall in one hour causing ESC measures to become overwhelmed. No environmental resources were impacted. It should be noted that the EI observed this impact during the late afternoon hours and this item will be discussed in the Environmental Auditor Bi-Weekly Report ending on 8/18/2024. It should be noted that the permanent waterbar end treatments contributed to approximately four of the off right of way impacts). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>												
Total Number of Environmental Resource Impacts: <b>6 (1-2.</b> On 7/23/2024, the EIs observed environmental resource impacts at S-B6 east of Riddle Road and S-A7 east of Listening Hill Road. On 7/22/2024, a strong storm event produced approximately 1.2 inches to 1.3 inches in one to two hours causing ESC and SWM measures to become overwhelmed. It should be noted that runoff from the permanent waterbar end treatments contributed to the impacts. The VADEQ was immediately notified, ESC and SWM measures repaired/maintained, sediment removed, and the impacted areas stabilized within the required timeframe. <b>3.</b> On 7/25/2024 the EI observed an environmental resource impact at S-002 east of Chalk Level Road. On 7/3/2024, a strong storm event produced approximately 0.9" in two hours. This storm event coupled with existing saturated conditions caused streambank erosion. The VADEQ was immediately notified, ESC measures repaired/enhanced, sediment removed, and the impacted area stabilized within the required timeframe. <b>4.</b> On 7/29/2024 the EI identified and environmental resource impact at S-B6 east of Riddle Road. On 7/23/2024, a strong storm event produced approximately 1.1 inches of rainfall in two hours. This storm event coupled with existing saturated conditions and runoff from the upslope permanent waterbar end treatments caused the upland slope and streambank to become saturated and subsequently sloughing into the stream. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the impacted area stabilized within the required timeframe. An engineering review and redlines are underway to provide long term slope stabilization. <b>5.</b> On 7/30, the EI observed an environmental resource impact at S-G15 east of Ramsey Memorial Road. On 7/29/2024, storm events produced approximately one inch of rainfall in two hours. These events coupled with existing saturated conditions and existing erosion under the soil stabilization blanket caused the streambank to slough into the stream channel. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the impacted area stabilized within the required timeframe via an extension request approval. An engineering review is currently underway to develop long term streambank stabilization. <b>6.</b> On 8/4/2024, the EI observed an environmental resource impact due to livestock damage at S-H37 west of Jacks Creek Road. On 8/3/2024, a strong storm event produced approximately 1.4 inches of rainfall in one hour. This event coupled with damaged ESC measures from livestock activities resulted in the stream impact. This item has 24 Hours to be addressed and will be further discussed in the Environmental Auditor Bi-Weekly Report ending on 8/18/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration and Final Notice of Force Majeure Declaration on 7/28/2024 and 8/2/2024, respectively for S-B6, S-A7, and S-002. <b>Refer to Environmental Inspector Observations, Environmental Auditor Field Observations and Recommendations, and Required Findings and Conclusions for further discussion.</b>												
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: <b>10</b> <b>Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were not sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 7/22/2024 through 8/4/2024. Refer to Environmental Auditor Field Observations and Recommendations and required Findings and Conclusions for further discussion.</b>												
CARRY OVER ITEMS FROM 7/20/2024												
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	
2/21/2024		1	1					1 on 2/22, 2/29, and 4/2//2024 to be completed upon engineer review/redlines			One item was identified as an environmental resource impact at S-F11 (Blackwater River) requiring streambank repair due to water flowing from the dewatering facilities to a natural low point just above the streambank resulting in the bank sloughing. Sediment caused by the streambank sloughing was removed below the streambank. A long term extension request has been approved by the VADEQ on 2/29/2024 to conduct streambank repairs upon engineer review/redlines and agency approvals.	
2/22/2024		1	1					1 on 2/22, 2/29, and 4/2/2024 to be completed upon verification by the VADEQ Aquatic Biologist			One item was identified as an environmental resource impact at S-C-19 (Maggodee Creek) requiring streambank repair due to water flowing from dewatering facilities to natural low spots and through existing gullies on the S-C19 streambank. Sediment caused by the streambank erosion was removed. The VADEQ required an extension request until an aquatic biologist from the agency confirms sediment removal and streambank stabilization are adequate.	
7/18/2024	0.1"-0.25" - 2 Hours *Scattered storms occurred on 7/17/2024	5					5	4 on 7/20, 7/23, 7/26, and 7/29 to be completed on 8/2/2024 due to wet conditions 1 item received multiple extension requests on 7/20/2024 through 8/2/2024 (engineer review/redlines and wet conditions)		4 on 7/31/2024	Five items were identified requiring ESC and SWM repair/maintenance and four were completed within the required timeframe via extension request approvals. <b>One of the identified items has until 8/5/2024 to be completed via an extension request approval due to an engineering and redlines. It should be noted that this item received an additional extension request on 8/2/2024 due to another rainfall event resulting in wet conditions.</b>	
7/19/2024	0.3"-1.3" - .5 Hours *Strong storms occurred on 7/18/2024	26	1 (S-MM44)				26 (includes environmental resource impact)	1 on 7/20/2024 to be completed on 7/23/2024 due to wet conditions (environmental resource impact)  12 on 7/20/2024 to be completed on 7/23/2024 due to wet conditions  8 on 8/20/2024 through 8/1/2024 due to due to wet conditions	1 on 7/23/2024 (environmental resource impact)	2 on 7/22/2024 8 on 7/23/2024 7 on 7/25/2024 1 on 7/31/2024 3 on 8/1/2024 *4 on 8/2/2024	Twenty-six items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe.  One of the identified items was an environmental resource impact at S-MM44 east of Indian Cave Road. On 7/18/2024, strong storm events caused ESC measures to become overwhelmed impacting approximately 100 feet of the stream. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/enhanced, sediment removed, and areas stabilized within the required timeframe via an extension request approval. It should be noted that the Environmental Auditor observed ESC measures directly above S-MM44 not properly installed per the required ESC Plans and Annual Standards and Specifications (AS&S). Refer to the 7/21/2024 Environmental Auditor Bi-Weekly Report for further discussion. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration and Final Notice of Force Majeure Declaration on 7/23/2024 and 7/28/2024, respectively.  <b>*It should be noted that four of the items completed on 8/2/2024 were due on 8/1/2024 and exceeded the three day timeframe requirement by one day as extension requests were denied by the VADEQ due to dry conditions. Refer to Environmental Auditor Field Observations and Recommendations and Required Findings and Conclusions for further discussion.</b>	
7/21/2024	0.3"-1.3" - 1 Hour *Strong storm events occurred on 7/20/2024	4		4					4 on 7/22/2024		Four items were identified requiring ESC repair/maintenance and completed within the required timeframe. These items were off right of way sediment impacts up to 20 feet within upland areas west of Jacks Creek Road. On 7/20/2024, strong storm events caused ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures repaired/maintained, landowner access granted, sediment removed, and the areas stabilized within the required timeframe. The LEI submitted an Agency Compliance Form (Problem Area Report #988) on 7/21/2024.	



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
7/22/2024	0.2"-1.4" - 1 Hour *A strong storm event occurred on 7/21/2024	20		1		2	20 (includes off right of way impact)	15 on 7/24/2024 with several items extending through 7/30/2024 due to wet conditions	1 on 7/23/2024 (off right of way impact)	4 on 7/23/2024 4 on 7/25/2024 3 on 7/30/2024 1 on 8/1/2024 *7 on 8/2/2024	Twenty items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Two of the identified items were caused by third party impacts related to unauthorized traffic and wildlife traffic. One item was identified as an off right of way sediment impact approximately 15 feet within an upland area west of Indian Cave Road. On 7/21/2024, a strong storm event coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (Problem Area Report #1003) on 7/22/2024.  <b>*It should be noted that 6 of the items completed on 8/2/2024 were due on 8/1/2024 and exceeded the three day timeframe requirement by one day as the extension requests were denied by the VADEQ due to dry conditions. Refer to Environmental Auditor Field Observations and Recommendations and Required Findings and Conclusions for further discussion.</b>
7/23/2024	0.0"-0.75" - 2 Hours *Scattered storm events occurred on 7/22/2024	26	2	2		1	26 (includes off right of way and environmental resource impacts)	22 on 7/24/2024 with several items extending through 8/2/2024 due to wet conditions	2 on 7/25/2024 1 on 7/24/2024	3 on 7/24/2024 1 on 7/28/2024 3 on 7/29/2024 1 on 8/1/2024 5 on 8/2/2024 6 on 8/3/2024	Twenty-six items were identified requiring ESC and SWM repair/maintenance and 22 were completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic. Two items were identified as off right of way sediment impacts up to 60 feet within upland areas east of Listening Hill Road west of Ramsey Memorial Road. On 7/22/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. It should be noted that runoff from the permanent waterbar end treatments contributed to the erosion and subsequent off right of way impacts. The VADEQ was immediately notified, landowner access granted, ESC and SWM measures repaired/maintained, sediment removed, and the areas stabilized within the required timeframe. One of the completed items received an extension request approval. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (Problem Area Report #1004) on 7/23/2024.  Two items were identified as environmental resource impacts at S-B6 east of Riddle Road and S-A7 east of Listening Hill Road. On 7/22/2024, storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC and SWM measures to become overwhelmed. It should be noted that runoff from the permanent waterbar end treatments contributed to the erosion and subsequent stream impacts. At S-B6, runoff from above permanent waterbar end treatments caused erosion on the streambank subsequently depositing sediment into the stream channel. The VADEQ was immediately notified, ESC measures temporarily repaired/maintained, sediment removed, and the area temporarily stabilized within the required timeframe. At S-A7, runoff from the upslope permanent waterbar end treatments caused erosion resulting in the ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures repaired/enhanced, and sediment removed from the stream channel within the required timeframe via an extension request approval. The LEI submitted Agency Compliance Form (Problem Area Reports #1005 and #1010) on 7/23/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration and Final Notice of Force Majeure Declaration on 7/28/2024 and 8/2/2024, respectively.  <b>The remaining four items received extension request approvals due to wet conditions.</b>
7/24/2024	0.5"-1.1" - 2 Hours *Scattered storm events occurred on 7/23/2024	13					13	2 on 7/27 and 7/30/2024 to be completed on 8/2/2024  10 on 7/27, 7/30, and 8/2/2024 to be completed on 8/5/2024		1 on 7/27/2024 2 on 7/31/2024 4 on 8/3/2024	Thirteen items were identified requiring ESC repair/maintenance and 7 were completed within the required timeframe. <b>The remaining 6 items received extension request approvals.</b>
7/25/2024		18	1	1			18 (includes off right of way and environmental resource impacts)	5 on 7/27 and 7/30/2024 to be completed on 8/2/2024  6 on 7/27, 7/30, and 8/2/2024 to be completed on 8/6/2024 due to wet conditions	1 on 7/26/2024 (environmental resource impact)	6 on 7/26/2024 5 on 8/1/2024	Eighteen items were identified requiring ESC and SWM repair/maintenance and 12 were completed within the required timeframe. One item was identified as an off right of way sediment impact approximately 60 feet within an upland area east of Chalk Level Road. On 7/23/2024, a strong storm event coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted.  One item was identified as an environmental resource impact at S-OO2 east of Chalk Level Road. On 7/23/2024, a strong storm event coupled with existing saturated conditions caused erosion on the streambank subsequently impacting the stream. The VADEQ was immediately notified, ESC measures replaced on the streambank, sediment removed, and the impacted area stabilized within the required timeframe. The LEI submitted an Agency Compliance Form (Problem Area Report #1012) on 7/26/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration and Final Notice of Force Majeure Declaration on 7/28/2024 and 8/2/2024, respectively.  <b>The remaining 6 items received extension request approvals.</b>
7/26/2024		5						5 on 7/27, 7/30, and 8/2/2024 to be completed on 8/6/2024 due to wet conditions			<b>Five items were identified requiring ESC repair/maintenance and received extension request approvals.</b>
7/29/2024		9	1	1		2	7 (includes off right of way and environmental resource impacts)	6 on 8/1 and 8/2/2024 to be completed on 8/6/2024 due to wet conditions	2 on 7/30/2024 (environmental resource impact)	1 on 7/30/2024 (off right of way impact)	Nine items were identified requiring ESC repair/maintenance and three were completed within the required timeframe. Two of the identified items were caused by third party impacts related to unauthorized traffic. One item was identified as an off right of way impact sediment approximately 5 feet within an upland area west of Riddle Road. On 7/23/2024, a strong storm event coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted.  One item was identified as an environmental resource impact at S-B6 east of Riddle Road. On 7/23/2024, a strong storm event coupled with existing saturated conditions caused the upland slope and streambank to become saturated and subsequently sloughing into the stream channel. It should be noted that runoff from the permanent waterbar end treatments east of the stream contributed to the impact. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the impacted area stabilized within the required timeframe. This area received an extension request approval due to necessary engineering review and redlines to provide long term slope stabilization. The LEI submitted an Agency Compliance Form (Problem Area Report #1013) on 7/29/2024. The MVP Environmental staff submitted a Final Notice of Force Majeure Declaration on 8/2/2024.  <b>The remaining 6 items received extension request approvals.</b>

7/30/2024	0.0"-1.0" - 12 Hours *Isolated storm events occurred on 7/29/2024	11	1				11 (includes environmental resource impact)	1 on 7/31 and 8/2/2024 to be completed on 8/5/2024 9 on 8/2/2024 to be completed on 8/6/2024 due to wet conditions	1 on 7/31/2024 (environmental resource impact)	1 on 8/3/2024 (extension request)	Eleven items were identified requiring ESC repair/maintenance and two were completed within the required timeframe. One item was identified as an environmental resource impact at S-G15 east of Ramsey Memorial Road. On 7/29/2024, storm events coupled with existing saturated conditions and existing erosion under the soil stabilization blanket caused the streambank to slough into the stream channel. It should be noted that on previous evaluations, the Environmental Auditor communicated concerns regarding this location related to the erosion and the streambank instability. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the impacted area stabilized within the required timeframe via an extension request approval. An engineering review is currently underway to develop long term streambank stabilization. The LEI submitted an Agency Compliance Form (Problem Area Report #1015) on 7/30/2024. <b>Refer to Environmental Auditor Observations and Recommendations and Required Findings and Conclusions for further discussion.</b>  <b>The remaining 9 items received extension request approvals.</b>
7/31/2024		1				1			1 on 8/1/2024		One item was identified requiring ESC repair/maintenance and completed within the required timeframe. This item was caused by third party impacts related to livestock traffic.
8/1/2024		10				5	5	1 on 8/2/2024 to be completed on 8/6/2024 6 on 8/3/2024 to be completed on 8/7/2024 due to wet conditions	1 on 8/2/2024	1 on 8/1/2024 1 on 8/2/2024	Ten items were identified requiring ESC repair/maintenance and three were completed within the required timeframe. Five of the identified items were caused by third party impacts related to unauthorized traffic (3) and wildlife traffic (2). <b>The remaining 7 items received extension request approvals.</b>
8/2/2024		2					2				<b>Two items were identified requiring ESC repair/maintenance and have three days to be completed within the required timeframe.</b>
8/4/2024	0.25"-2.0" - 1 Hour *Scattered storm events with areas of high intensity/short duration rainfall occurred on late 8/3/2024	19	1	1		1	18 (includes off right of way and environmental resource impacts)				Nineteen items were identified requiring ESC and SWM repair/maintenance. One item was identified as an off right of way sediment impact approximately 10 feet within an upland area west of Jacks Creek Road. On 8/3/2024, a strong storm event caused ESC measures to become overwhelmed. The VADEQ was immediately notified and this item has 24 Hours to be completed within the required timeframe.  One item was identified as an environmental resource impact at S-H37 west of Jacks Creek Road caused by third party impacts related to livestock activity. On 8/3/2024, a strong storm event coupled with damaged to ESC measures due to livestock activity resulted in streambank erosion subsequently impacting the stream. The VADEQ was immediately notified and this item has 24 Hours to be completed within the required timeframe.  <b>Two items have 24 hours to be completed within the required timeframe and 17 items have three days to be completed within the required timeframe. It should be noted that the off right of way and stream impacts were identified by the EI during the late afternoon hours.</b>
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
7/23/2024	0.0"-0.75" - 2 Hours *Scattered storms occurred on 7/22/2024	1					1	1 on 7/24, 7/27, and 7/30/2024 to be completed on 8/2/2024		1 on 8/2/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
7/24/2024	0.5"-1.1" - 2 Hours *Scattered storm events occurred on 7/23/2024	11				1	10	8 on 7/27 and 7/30/2024 to be completed on 8/2/2024 One of the items received an additional extension request on 8/2/2024 to be completed on 8/6/2024 due to wet conditions	3 on 7/25/2024	7 on 8/1/2024	Eleven items were identified requiring ESC and SWM repair/maintenance and 10 were completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic. <b>This remaining item received an extension request due to the magnitude of the damage and wet conditions.</b>
7/25/2024		3					3	2 on 7/27 and 7/30/2024 to be completed on 8/2/2024	1 on 7/25/2024	1 on 8/1/2024 1 on 8/2/2024	Three items were identified requiring ESC repair/maintenance and completed within the required timeframe.
7/27/2024		1					1	1 on 7/30 and 8/2/2024 to be completed on 8/10/2024 due to saturated conditions on steep slope prohibiting heavy equipment from completing permanent repairs			One item was identified requiring ESC repair/maintenance due to saturated soil sliding over dry soil on a steep slope. Temporary ESC measures were installed in the interim and final repairs will be conducted once drier conditions allow for heavy equipment activities. <b>This item received extension request approvals.</b>
7/31/2024		1					1			1 on 8/2/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
8/1/2024		2					2			2 on 8/2/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/2/2024		1					1				<b>One item was identified requiring ESC repair/maintenance and has three days to be completed within the required timeframe.</b>
8/3/2024	0.0"-0.7" - 2 Hours *Isolated rainfall occurred on 8/2/2024	1					1				<b>One item was identified requiring ESC repair/maintenance and has three days to be completed within the required timeframe.</b>
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			
7/23/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-LY-045/046, MVP-FR-320 (CIS/GAS), Jacks Creek Road (CIS/GAS), MVP-FR-321.01 (CIS/GAS), and Longwood Road (GAS).							The Environmental Auditor observed locations where the ESC and SWM and Pollution Prevention measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor evaluated the right of way west of Jacks Creek Road where off right of way impacts within upland locations were identified by the EI on 7/21/2024. The Environmental Auditor observed the ESC measures repaired, sediment removed, and the impacted areas stabilized. It should be noted that these locations along with S-H37 have been subjected to continuous livestock traffic. The Environmental Auditor communicated with the LEI, Environmental Coordinator (EC), Chief EI, and MVP Environmental staff regarding locations where erosion was observed on the right of way which could result in potential off right of way/environmental resource impacts. It should be noted that it appeared runoff is concentrating at the permanent waterbar end treatments resulting in increased runoff rates downslope.			

8/1/2024	<p>The Environmental Auditor conducted site evaluations at the following locations: Ramsey Memorial Road (GAS), Transco Road (CIS), Transco Interconnect Station, H-602, Riddle Road (GAS), and Bar Ridge Road (CIS).</p>	<p>The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor met with the EI at Ramsey Memorial Road (GAS) to review the impacts to S-G15 identified by the EI on 7/30/2024 and ongoing upland erosion issues which appear to be emanating from the permanent waterbar end treatments and a natural swale along the edge of the right of way. The Environmental Auditor observed temporary ESC measure repairs directly above the S-G15 streambank. The Environmental Auditor provided recommendations to address the upslope erosion issues that entailed stabilizing the swale and below permanent waterbar end treatments with soil stabilization matting (SSM) coupled with sediment control measures to direct flow off the right of way. The Environmental Auditor also reviewed a natural drainage feature east of S-G15 where continued erosion is occurring due to improper erosion control measures installed. The Environmental Auditor recommended grading the erosion, removing sediment build up at the terminus of the drainage feature, and stabilizing the flow path with soil stabilization matting (SSM). The proposed recommendations were discussed with the project engineer and redlines were developed and submitted on 8/2/2024. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding the observations and recommendations.</p> <p>The Environmental Auditor evaluated locations where an right of way impact and environmental resource impact at S-002 were identified by the EIs on 7/25/2024. The Environmental Auditor observed the ESC measures enhanced, off right of way sediment removed, and the impact area stabilized within the upland off right of way impact area. The Environmental Auditor observed the sediment removed from the S-002 streambed and repairs conducted on the streambank and slope. During the evaluation, it appeared there may be additional sediment deposition immediately downstream and the Environmental Auditor requested the EI investigate this area. The Environmental Auditor also noted torn SSB on the opposite streambank/slope with minor erosion occurring. The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding this issue and highly recommended installing a higher grade SSB as the current SSB is not an effective measure per Section 3.2 of the Annual Standards and Specifications (AS&amp;S) due to concentrated flow conditions (shear stress, velocity, and functional longevity).</p>
7/22/2024 through 8/4/2024	<p>The Environmental Auditor reviewed and noted issues with the daily MVP Punchlists and SWPPP VSIRs during this reporting period for the Spread I Project. Throughout this reporting period the Environmental Auditor found multiple inconsistencies with the daily MVP Punchlists and issues related to complete and thorough SWPPP VSIR documentation. The Environmental Auditor communicated findings on a daily basis with the Chief EI, Lead EI, EC, and MVP Environmental staff. The Environmental Auditor also communicated entering proper timeframe prioritization on the daily MVP Punchlist per the AS&amp;S requirements.</p> <p>On 7/11/2024 and 7/17/2024, the Environmental Auditor evaluated S-G15 east of Ramsey Memorial Road and observed the west streambank showing signs of sloughing and erosion under the SSB directly above the streambank. The Environmental Auditor communicated these concerns during and immediately following the evaluations. On 7/30/2024, the EI observed an environmental resource impact at S-G15 due to the streambank sloughing into the stream channel following precipitation events.</p> <p>Based on communication, internal feedback, and VADEQ extension request denials on 8/1/2024 (email from VADEQ at 3:09 pm), the contractor was not adequately staffed to address the daily MVP Punchlist items to meet the required timeframes. It should be noted that based on the VADEQ denials, 10 items were not completed within the required timeframe. It should be noted that no 24 Hour timeframe requirements and no daily MVP Punchlist items for off right of way/environmental resource impacts were exceeded. Based on communication with the MVP Environmental staff and Chief EI, additional contractor personnel have been added to the project.</p> <p>The Environmental Auditor communicated with all Spread LEIs on 7/31/2024 regarding the Bi-Weekly reporting period ending on 8/4/2024. The Environmental Auditor provided continued recommendations to install appropriate ESC measures when straw mulch is rendered ineffective per Section 3.2 of the Annual Standards and Specifications and ensure soil stabilization blanket is properly installed per the ESC Plan requirements related to anchoring/entrenching and blanket to ground contact. The Environmental Auditor also made a recommendation to upgrade the soil stabilization blanket to one applicable to the steep slopes and flow conditions.</p>	<p>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 I Project appears to meet the MVP Annual Standards and Specifications as required by the Virginia Erosion and Stormwater Management Act .</p> <p>The Environmental Auditor recommended ensuring sufficient contractor staff is available to conducted ESC and SWM repairs/maintenance in the required timeframes as applicable to weather conditions. The Environmental Auditor also recommended conducting QA/QC on all documentation to ensure thoroughness and consistency is achieved in a timely manner.</p>
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	On 7/11/2024 and 7/17/2024, the Environmental Auditor evaluated S-G15 east of Ramsey Memorial Road and observed the west streambank showing signs of sloughing and erosion under the SSB directly above the streambank. The Environmental Auditor communicated these concerns during an onsite meeting with the EI and immediately following the evaluations. On 7/30/2024, the EI observed an environmental resource impact at S-G15 due to the streambank sloughing into the stream channel following precipitation events.
All Ineffective Temporary Erosion and Sediment Control Measures are repaired and ESC Measures in Need of Routine Maintenance are maintained within the required timeframes?	No	Based on communication, internal feedback, and VADEQ extension request denials on 8/1/2024 (email from VADEQ at 3:09 pm), the contractor was not adequately staffed to address the daily MVP Punchlist items to meet the required timeframes throughout this reporting period. It should be noted that based on the VADEQ denials, 10 items were not completed within the required timeframe. It should be noted that no 24 Hour timeframe requirements and no daily MVP Punchlist items for off right of way/environmental resource impacts were exceeded. Per communication with the MVP Environmental staff and Chief EI, additional contractor personnel have been added to the project.



MOUNTAIN VALLEY PIPELINE  
SPREAD I  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 8/5/2024 through 8/18/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 8/18/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>60</b> conducted from 8/5/2024 through 8/18/2024 (includes Transco Interconnect Station/H-602/H-603/Laydown Yards); It should be noted that SWPPP inspections were not conducted on 8/8/2024 and 8/9/2024 due to safety concerns related to Tropical Storm Debby. The VADEQ was notified in advance regarding the postponed inspections. <b>Refer to Environmental Auditor Field Observations and Recommendations for further discussion related to SWPPP VSIR reviews.</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 8/5/2024 through 8/18/2024 (includes Carry Over Items from 8/4/2024): <b>146</b> <b>(Refer to Environmental Auditor Field Observations and Recommendations for further discussion related to daily MVP Punchlist observations).</b>											
Total Number of ODCP Inspections at Laydown Yard 045/046: <b>0; All refueling tanks were removed from MVP-LY-046 on 7/17/2024.</b>											
Total Number of VA DEQ Observations from 8/5/2024 through 8/18/2024 (includes Carry Over Items from 8/4/2024): <b>14</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>13</b> (livestock traffic, unauthorized traffic, and landowner traffic)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>0</b>											
Total Number of Environmental Resource Impacts: <b>5</b> (1-3. On 8/10/2024, the EIs observed environmental resource impacts at S-B6 east of Riddle Road, W-H17 east of Highway 40, and S-H37 west of MVP-FR-320. From 8/7/2024 through 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby produced approximately 4.4 inches in 24 hours. This event caused streambank erosion/sloughing resulting in impacts to the streams and ESC and SWM measures to become overwhelmed resulting in a wetland impact. At S-B6, continued runoff from the upslope permanent waterbar end treatments contributed to the impact. It should be noted that previous related impacts occurred at this location and extension requests were approved by the VADEQ until permanent repairs can be conducted. At W-H17, upslope off right of way run-on contributed to the impact. At S-H37, ongoing livestock activities damaged the ESC and SWM measures resulting in the impact. The VADEQ was immediately notified, ESC and SWM measures repaired/maintained, sediment removed, and the areas stabilized within the required timeframe. 4. On 8/12/2024 the EI observed an environmental resource impact at S-G18 east of Timber Ridge Road. From 8/7/2024 through 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby produced approximately 4.4 inches in 24 hours causing streambank erosion resulting in a sediment impact to the stream. The VADEQ was immediately notified, ESC measures replaced, sediment removed, and the streambanks stabilized within the required timeframe. 5. On 8/16/2024, the VADEQ inspector identified and environmental resource impact at S-002 east of Chalk Level Road. Third party foot traffic damaged the ESC measures and caused an area of the slope to slough resulting in a sediment impact to the stream. The streambank was regraded, ESC measures repaired/enhanced, and sediment removed from the stream within the required timeframe. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 8/14/2024 for S-B6, W-H17, and S-H37. The MVP Environmental staff is in the process of preparing a Courtesy Notice of Force Majeure Declaration for S-002). <b>Refer to Environmental Inspector Observations and VADEQ Observations for further discussion.</b>											
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: <b>19</b>											
Based on the Environmental Auditor's observations, the resources available and deployed in the field, including environmental inspectors and the construction contractor, were <u>not</u> sufficient to regularly and consistently repair ineffective BMP measures in a timely manner from 8/5/2024 through 8/18/2024. <b>Refer to Environmental Auditor Field Observations and Recommendations and required Findings and Conclusions for further discussion.</b>											
CARRY OVER ITEMS FROM 8/4/2024											
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
2/21/2024		1	1					1 on 2/22, 2/29, and 4/2/2024 to be completed upon engineer review/redlines			One item was identified as an environmental resource impact at S-F11 (Blackwater River) requiring streambank repair due to water flowing from the dewatering facilities to a natural low point just above the streambank resulting in the bank sloughing. Sediment caused by the streambank sloughing was removed below the streambank. A long term extension request has been approved by the VADEQ on 2/29/2024 to conduct streambank repairs upon engineer review/redlines and agency approvals.
2/22/2024		1	1					1 on 2/22, 2/29, and 4/2/2024 to be completed upon verification by the VADEQ Aquatic Biologist			One item was identified as an environmental resource impact at S-C-19 (Maggodee Creek) requiring streambank repair due to water flowing from dewatering facilities to natural low spots and through existing gullies on the S-C19 streambank. Sediment caused by the streambank erosion was removed. The VADEQ required an extension request until an aquatic biologist from the agency confirms sediment removal and streambank stabilization are adequate.
7/18/2024	0.1"-0.25" - 2 Hours *Scattered storms occurred on 7/17/2024	1					1	1 on 7/20/2024 through 8/8/2024 to be completed on 8/12/2024 (engineer review/redlines and wet conditions)		1 on 8/12/2024	One item was identified requiring ESC and SWM repair/maintenance repair. This item received extension request approvals due to wet conditions as engineered redlines require the use of heavy equipment. It should be noted that temporary ESC measures were repaired/replaced just prior to Tropical Storm Debby.
7/23/2024	0.0"-0.75" - 2 Hours *Scattered rainfall occurred on 7/22/2024	4				1	3	3 on 7/24/2024 through 8/2/2024 to be completed on 8/6/2024  1 on 7/24/2024 through 8/8/2024 to be completed on 8/12/2023		3 on 8/6/2024 1 on 8/12/2024	Four items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe via extension request approvals. One of the identified items was caused by third party impacts related to unauthorized traffic.
7/24/2024	0.5"-1.1" - 2 Hours *Scattered storm events occurred on 7/23/2024	7 (1 VADEQ item)				1	6	3 on 7/27/2024 through 8/2/2024 to be completed on 8/6/2024 1 on 7/27/2024 through 8/7/2024 to be completed on 8/10/2024 (1 extension request denied by the VADEQ due to dry conditions) 2 on 7/27/2024 through 8/15/2024 to be completed on 8/16/2024 (2 extension request denied by the VADEQ due to dry conditions) 1 on 7/27/2024 through 8/15/2024 to be completed on 8/18/2024 (1 extension request denied by the VADEQ due to dry conditions)		1 on 8/5/2024 2 on 8/6/2024 *1 on 8/9/2024 *1 on 8/16/2024	Seven items were identified requiring ESC and SWM repair/maintenance and three were completed within the required timeframe via extension request approvals.  *It should be noted two items were due on 8/6/2024 and exceeded the three day required timeframe by one day as the VADEQ denied additional extension requests due to dry conditions. Due to a rain event on 8/7/2024, these item received new extension request approvals and were completed on 8/9/2024 and 8/16/2024, respectively.  One remaining item was granted an extension request to be completed on 8/16/2024 and was not completed within the required timeframe. This item was subsequently granted an extension request on 8/17/2024 due to a rain event on 8/16/2024.  One remaining item was denied an additional extension request by the VADEQ on 8/15/2024 and not completed within the required timeframe. This item was subsequently granted an extension request on 8/17/2024 due to a rain event on 8/16/2024.

7/25/2024		*5					5 (1 non-environmental ponding item removed from the punchlist due to subsidence)	1 on 7/27/2024 through 8/2/2024 to be completed on 8/6/2024 1 on 7/27/2024 through 8/6/2024 to be completed on 8/6/2024 2 on 7/27/2024 through 8/6/2024 to be completed on 8/9/2024 1 on 7/27/2024 through 8/15/2024 to be completed on 8/16/2024 (1 extension request denied by the VADEQ due to dry conditions)		1 on 8/6/2024 *3 on 8/7/2024 *1 on 8/16/2024	Five items were identified requiring ESC and SWM repair/maintenance and three were completed within the required timeframe via extension request approvals.  *It should be noted two items were due on 8/6/2024 and exceeded the three day required timeframe by one day as the VADEQ denied additional extension requests due to dry conditions. One of the items was subsequently granted an extension request due to a rain event on 8/7/2024.
7/26/2024		5					5	2 on 7/27/2024 through 8/2/2024 to be completed on 8/6/2024 3 on 7/27/2024 through 8/6/2024 to be completed on 8/9/2024 (1 extension request denied by the VADEQ due to dry conditions)		2 on 8/5/2024 *3 on 8/7/2024	Five items were identified requiring ESC and SWM repair/maintenance and four were completed within the required timeframe via extension request approvals.  *It should be noted one item was due on 8/6/2024 as an extension request was denied by the VADEQ due to dry conditions. The item was completed on 8/7/2024 and exceeded the required three day timeframe by one day.
7/27/2024		1 (VADEQ item)					1	1 on 7/30, 8/2, 8/9, 8/12, and 8/15/2024 to be completed on 8/16/2024 (saturated conditions on steep slope prohibiting heavy equipment from completing permanent repairs)			One item was identified requiring ESC repairs on a steep slope. Saturated soils on top of dry soils caused a portion of the slope to slide. Interim ESC measures were installed until equipment can conduct permanent grading activities.
7/29/2024		6				2	4	5 on 8/1 and 8/2/2024 to be completed on 8/6/2024 1 on 8/1/2024 through 8/9/2024 to be completed on 8/13/2024		5 on 8/6/2024 *1 on 8/9/2024	Six items were identified requiring ESC repair/maintenance and 5 were completed within the required timeframe via extension request approvals.  *It should be noted one of items was due on 8/6/2024 as an extension request was denied by the VADEQ due to dry conditions and exceeded the timeframe required by one day. This item was subsequently granted an extension request approval due to a rain event on 8/7/2024.
7/30/2024	0.0"-1.0" - 12 Hours *Isolated rainfall occurred on 7/29/2024	9					9	7 on 8/2 and 8/6/2024 to be completed on 8/6/2024  2 on 8/2/2024 through 8/9/2024 to be completed on 8/13/2024		*7 on 8/7/2024 *2 on 8/9/2024	Nine items were identified requiring ESC repair/maintenance.  *Seven items were due on 8/6/2024 and two items were due on 8/8/2024. These items exceeded the required three day timeframes by one day.
8/1/2024		6				5	1	3 on 8/3/2024 to be completed on 8/7/2024  *1 on 8/2/2024 through 8/15/2024 to be completed on 8/16/2024 (engineer/geotech review for unstable/saturated streambank at S-B6)  2 on 8/3, 8/7, and 8/9/2024 to be completed on 8/13/2024		3 on 8/5/2024 2 on 8/13/2024 *1 on 8/16/2024	Six items were identified requiring ESC and SWM repair/maintenance and 5 were completed within the required timeframe via extension request approvals. Five of the identified items were caused by third party impacts related to unauthorized traffic (3) and wildlife traffic (2).  *It should be noted one item completed on 8/16/2024 was due on 8/15/2024 and exceeded the required three day timeframe by one day. However, based on the Environmental Auditor's field observation, the S-B6 streambank was saturated and requires and additional engineer review and redlines to implement additional permanent slope protection measures. At the time of the evaluation, temporary ESC measures were installed within the required timeframe.
8/2/2024		3 (1 VADEQ item)					3			*3 on 8/6/2024 (items exceeded timeframe by one day)	Three items were identified requiring ESC repair/maintenance and completed. *It should be noted that these items were due on 8/5/2024 and exceeded the required timeframe by one day. No extension requests were submitted to the VADEQ.
8/3/2024	0.0"-0.7" - 2 Hours *Isolated rainfall occurred on 8/2/2024	*1 (VADEQ item)					1			1 on 8/6/2024	One item was identified requiring ESC properly installation and completed within the required timeframe. *It should be noted that this item was evaluated by the EI and observed that the SSB was properly installed.
8/4/2024	0.25"-2.0" - 1 Hour *Scattered storm events with areas of high intensity/short duration rainfall occurred on late 8/3/2024	19	1	1		1	18 (includes off right of way and environmental resource impacts)		2 on 8/5/2024	16 on 8/5/2024 1 on 8/7/2024	Nineteen items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. One item was identified as an off right of way sediment impact approximately 10 feet within an upland area west of Jacks Creek Road. On 8/3/2024, a strong storm event caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the area stabilized within the required timeframe. No environmental resources were impacted.  One item was identified as an environmental resource impact at S-H37 west of Jacks Creek Road caused by third party impacts related to livestock traffic. On 8/3/2024, a strong storm event coupled with damaged ESC measures due to extensive livestock traffic caused streambank erosion resulting in a sediment impact to the stream. The VADEQ was immediately notified, ESC measures repaired/enhanced, and sediment removed within the required timeframe. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 8/9/2024 and a Final Notice of Force Majeure Declaration on 8/14/2024.
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
8/5/2024		5				2	3			4 on 8/6/2024 1 on 8/7/2024	Five items were identified requiring ESC repair/maintenance and completed within the required timeframe. Two of the identified items were caused by third party impacts related to unauthorized traffic.
8/6/2024		15				3	12	10 on 8/8/2024 to be completed on 8/12/2024  1 on 8/9/2024 to be completed on 8/12/2024 due to wet conditions		3 on 8/6/2024 1 on 8/7/2024 4 on 8/9/2024 6 on 8/10/2024 1 on 8/12/2024	Fifteen items were identified requiring ESC repair/maintenance and completed within the required timeframe. Three of the identified items were caused by third party impacts related to livestock traffic (1) unauthorized traffic (2).
8/9/2024	1.8"-4.4" - 24 Hours *A storm event from Tropical Storm Debby began on 8/7/2024 and continued through 8/8/2024	14				1	13	1 on 8/11 and 8/14/2024 to be completed on 8/18/2024 due to wet conditions		6 on 8/9/2024 6 on 8/10/2024 1 on 8/11/2024 1 on 8/16/2024	Fourteen items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. One of the identified items was caused by a third party impact related to unauthorized traffic.

8/10/2024		14	3				14 (includes environmental resource impacts)		1 on 8/10/2024 2 on 8/11/2024	8 on 8/10/2024 3 on 8/11/2024	Fourteen items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic. Three items were identified as environmental resource impacts at S-B6 east of Riddle Road, W-H17 east of Highway 40, and S-H37 east of Highway 40. From 8/7/2024 through 8/8/2024, a storm event with intervals of high intensity/short duration rainfall from Tropical Storm Debby caused ESC and SWM measures to become overwhelmed. At S-B6, continued issues related to runoff from permanent waterbar end treatments east of the stream caused the streambank to slough resulting in a sediment impact to the stream. The VADEQ was immediately notified, temporary ESC and SWM measures repaired/maintained, and sediment removed from the stream within the required timeframe. It should be noted that previous related impacts occurred at this location and extension requests were approved by the VADEQ until permanent repairs can be conducted. The LEI submitted an Agency Compliance Form (Problem Area Report #1022) on 8/10/2024. At W-H17, off right of way run-on caused severe erosion within the right of way. This event caused ESC and SWM measures to become damaged resulting in impacts to the wetland. The VADEQ was immediately notified, ESC and SWM measures repaired/enhanced, and sediment removed from W-H17 within the required timeframe. The LEI submitted an Agency Compliance Form (Problem Area Report #1023) on 8/10/2024. Based on previous issues related to the off right of way run-on, the Environmental Auditor recommended installing a higher grade soil stabilization matting (SSM) within the draw across the right of way. At S-H37, heavy rainfall coupled with damaged ESC and SWM measures from livestock activities caused streambank erosion resulting in a sediment impact to the stream. The VADEQ was immediately notified, ESC and SWM measures repaired/enhanced, and sediment removed from the stream within the required timeframe. The LEI submitted an Agency Compliance Form (Problem Area Report #1024) on 8/10/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration for all three impacts on 8/14/2024.
8/12/2024		18	1			2	16 (includes environmental resource impact)		1 on 8/13/2024	5 on 8/12/2024 5 on 8/13/2024 7 on 8/14/2024	Eighteen items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. Two of the identified items was caused by third party impacts related to landowner activities. One item was identified as an environmental resource impact at S-G18 east of Timber Ridge Road. On 8/8/2024, a storm event from Tropical Storm Debby with intervals of high intensity/short duration rainfall caused streambank erosion resulting in the stream impact. The VADEQ was immediately notified, the streambank regraded, ESC measures repaired/enhanced, and sediment removed from the stream within the required timeframe. The LEI submitted Agency Compliance Form (Problem Area Report #1025) on 8/12/2024. The MVP Environmental staff submitted a Courtesy Notice of Force Majeure Declaration on 8/14/2024.
8/13/2024		7				1	6			3 on 8/13/2024 4 on 8/14/2024	Seven items were identified requiring ESC and Pollution Prevention repair/maintenance and completed within the required timeframe. One of the identified items was caused by a third party impact related to landowner traffic.
8/14/2024		6				2	4			6 on 8/15/2024	Six items were identified requiring ESC repair/maintenance and completed within the required timeframe. Two of the identified items was caused by a third party impacts related to landowner traffic and livestock traffic.
8/15/2024		1				1				1 on 8/15/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe. This item was caused by third party impacts related to unauthorized traffic.
8/16/2024		1					1			1 on 8/16/2024	One item was identified requiring ESC 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
8/7/2024		2					2	1 on 8/9/2024 to be completed on 8/13/2024 due to wet conditions		1 on 8/9/2024 1 on 8/10/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/13/2024		1					1			1 on 8/15/2024	One item was identified requiring SWM repair/maintenance and completed within the required timeframe.
8/14/2024		3					3			3 on 8/15/2024	Three items were identified requiring ESC, SWM, and Pollution Prevention repair/maintenance and completed within the required timeframe.
8/15/2024		2					2			2 on 8/15/2024	Two items were identified requiring Pollution Prevention repair/maintenance and completed within the required timeframe.
8/16/2024		2	1			1	1 (includes environmental resource impact)		2 on 8/16/2024		Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. One item was identified as an environmental resource impact at S-002 east of Chalk Level Road. Third party foot traffic damaged the ESC measures and caused an area of the slope to slough resulting in a sediment impact to the stream. The streambank was regraded, ESC measures repaired/enhanced, and sediment removed from the stream within the required timeframe. The LEI submitted Agency Compliance Form (Problem Area Report #1029) on 8/16/2024. The MVP Environmental staff is in the process of preparing a Courtesy Notice of Force Majeure Declaration.
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			
8/7/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-FR-320 (CIS), Indian Cave Road (GAS), Anderson Mill Road #2 (CIS), Ramsey Memorial Road (GAS), and Bar Ridge Road (GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, and MVP Environmental staff regarding continued observations related to improper Soil Stabilization Blanket (SSB) installation, compost filter sock (CFS) undermining below permanent waterbar end treatments at several locations, and erosion occurring within a roadside ditch where straw mulch was applied.  The Environmental Auditor evaluated location where an right of way impact and environmental resource impact at S-H37 (west of Jacks Creek Road) were identified by the EI on 8/4/2024. The Environmental Auditor observed the ESC measures repaired/enhanced, off right of way sediment removed, and the impact area stabilized within the upland off right of way impact area. The Environmental Auditor observed the sediment removed from the S-H37 streambed and repairs conducted on the streambank and slope. It appears that livestock traffic at S-H37 continue to damage the ESC measures. The Environmental Auditor conducted a follow up evaluation at S-SS8 and observed the ESC measures enhanced at and above the stream. The Environmental Auditor conducted a follow up evaluation at Ramsey Memorial Road (GAS) and observed SSB installed over rills/gullies and a high potential for off right of way/environmental resource impacts as the ESC Plan redlines submitted on 8/2/2024 were not implemented at the time of the evaluation. The observations were communicated to the LEI, Chief EI, and MVP Environmental staff.			

8/5/2024 through 8/18/2024	The Environmental Auditor reviewed and continued to note issues with the daily MVP Punchlists and SWPPP VSIRs during this reporting period for the Spread I Project. Throughout this reporting period the Environmental Auditor found multiple inconsistencies with the daily MVP Punchlists and issues related to complete and thorough SWPPP VSIR documentation. The Environmental Auditor communicated findings on a daily basis with the Chief EI and MVP Environmental staff.		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 I Project appears to meet the MVP Annual Standards and Specifications (AS&S) as required by the Virginia Erosion and Sediment Control Law (VESCL) and the Stormwater Management Act Linear Entity.	
	On 8/5/2024, the EI observed sediment deposition from upstream third party activities within S-CC16, S-G3, S-G4, and S-G6 east of Snowberry Road following a strong storm event on 8/4/2024. On 8/14/2024, the EI observed sediment deposition from upstream third party activities at S-MM8, S-CC8, S-CC9, and S-CC10 east of Toshes Road following precipitation from remnants of Tropical Storm Debby that occurred from 8/7/2024 through 8/8/2024. No project related impacts were observed at the time of the inspections.			
	Based on communication, internal feedback and VADEQ extension request denials on 8/6/2024 and 8/15/2024 (emails from the VADEQ ) the contractor was not adequately staffed to address the daily MVP Punchlist items to meet the required timeframe. No 24 Hour timeframe requirements and no daily MVP Punchlist items for off right of way/environmental resource impacts were exceeded. The Environmental Auditor communicated with the MVP Environmental staff and Chief EI and was informed that additional contractor personnel were added to the project. The following should be noted: no extension requests were submitted for three items where the three day timeframe requirement expired and extension requests for Punchlist items were submitted but did not receive timely responses to the requests. This resulted in a short period of non-compliance before a response from the agency was received approving extension requests.			
		The Environmental Auditor communicates with all Spread LEIs on 8/14/2024 regarding the Bi-Weekly reporting period ending on 8/18/2024. The Environmental Auditor provided recommendations to upgrade SSB especially on steep slopes, streambanks, and below permanent waterbar end treatments where the current SSB is not functional due to higher flows. The Environmental Auditor also recommended conducting QA/QC on SWPPP VSIRs prior to submitting the documents to ensure all Sections are complete and consistent with the daily MVP Punchlist.		The Environmental Auditor continues to recommend ensuring sufficient contractor staff is available to conducted ESC and SWM repairs/maintenance in the required timeframes. The Environmental Auditor also continues to recommend conducting QA/QC on all daily MVP Punchlist and SWPPP VSIR documentation to ensure thoroughness, consistency, and timeframe requirements comply with the AS&S requirements.
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?	No	Based on communication, internal feedback, and VADEQ extension request denials on 8/6/2024 and 8/15/2024 (emails from VADEQ ), the contractor was not adequately staffed to address the daily MVP Punchlist items to meet the required timeframes. It should be noted that based on the VADEQ denials, 19 items were not completed within the required timeframe. No extensions were requested for three of the items. It should be noted that no 24 Hour timeframe requirements and no daily MVP Punchlist items for off right of way/environmental resource impacts were exceeded. Based on communication with the MVP Environmental staff and Chief EI, additional contractor personnel have been added to the project.		

Report Period Ending: 9/1/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>70</b> conducted from 8/19/2024 through 9/1/2024 (includes Transco Interconnect Station/H-602/H-603/Laydown Yards)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 8/19/2024 through 9/1/2024 (includes Carry Over Items from 8/18/2024): <b>29</b>											
Total Number of ODCP Inspections at Laydown Yard 045/046: <b>0</b> ; <b>All refueling tanks were removed from MVP-LY-046 on 7/17/2024.</b>											
Total Number of VA DEQ Observations from 8/19/2024 through 9/1/2024 (includes Carry Over Items from 8/18/2024): <b>10</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>9</b> (livestock traffic and unauthorized traffic)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>0</b>											
Total Number of Environmental Resource Impacts: <b>0</b>											
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: <b>0</b>											
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 8/19/2024 through 9/1/2024.											
CARRY OVER ITEMS FROM 8/18/2024											
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
2/21/2024		1	1					1 on 2/22, 2/29, and 4/2/2024 (24 Hours) to be completed upon engineer review/redlines			One item was identified as an environmental resource impact at S-F11 (Blackwater River) requiring streambank repair due to water flowing from the dewatering facilities to a natural low point just above the streambank resulting in the bank sloughing. Sediment caused by the streambank sloughing was removed below the streambank. A long term extension request has been approved by the VADEQ on 2/29/2024 to conduct streambank repairs upon engineer review/redlines and agency approvals.
2/22/2024		1	1					1 on 2/22, 2/29, and 4/2/2024 (24 Hours) to be completed upon verification by the VADEQ Aquatic Biologist			One item was identified as an environmental resource impact at S-C-19 (Maggodee Creek) requiring streambank repair due to water flowing from dewatering facilities to natural low spots and through existing gullies on the S-C19 streambank. Sediment caused by the streambank erosion was removed. The VADEQ required an extension request until an aquatic biologist from the agency confirms sediment removal and streambank stabilization are adequate.
7/24/2024	0.5"-1.1" - 2 Hours *Scattered storm events occurred on 7/23/2024	2					2	1 on 7/27/2024 through 8/19/2024 to be completed on 8/22/2024  1 on 7/27/2024 through 8/21/2024 to be completed on 8/25/2024		1 on 8/21/2024 1 on 8/23/2024	Two items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe via extension request approvals due to wet conditions inhibiting equipment.
7/27/2024		1 (VADEQ Item)					1	1 on 7/30/2024 through 8/25/2024 to be completed on 8/28/2024 (saturated conditions on steep slope prohibiting heavy equipment from completing permanent repairs)		1 on 8/27/2024	One item was identified requiring ESC repairs on a steep slope and completed within the required timeframe via extension request approvals. Saturated soils on top of dry soils caused a portion of the slope to slide. Erosion and Sediment Control measures were installed in the interim until equipment conducted permanent grading activities.
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
8/20/2024		5					5			2 on 8/20/2024 3 on 8/21/2024	Five items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/21/2024		6				3	3			1 on 8/21/2024 5 on 8/23/2024	Six items were identified requiring ESC repair/maintenance and completed within the required timeframe. Three of the identified items were caused by third party impacts related to unauthorized traffic.
8/22/2024		3				2	1			3 on 8/23/2024	Three items were identified requiring ESC repair/maintenance and completed within the required timeframe. Two of the identified items were caused by third party impacts related to unauthorized traffic.
8/23/2024		1				1				1 on 8/23/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe. This item was caused by third party impacts related to unauthorized traffic.
8/27/2024		1				1				1 on 8/27/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe. This item was caused by third party impacts related to unauthorized traffic.
8/28/2024		4				2	2			4 on 8/28/2024	Four items were identified requiring ESC repair/maintenance and completed within the required timeframe. Three of the identified items were caused by third party impacts related to unauthorized traffic and livestock traffic.
8/30/2024	0.0"-2.8" - 12 Hours *Scattered strong storms occurred on 8/29/2024	5					5			5 on 8/30/2024	Five items were identified requiring ESC 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
8/22/2024		2					2			2 on 8/23/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/27/2024		1					1			1 on 8/28/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
8/28/2024		1					1			1 on 8/29/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe. <b>It should be noted that the Environmental Auditor observed and communicated this same issue on 8/20/2024.</b>
8/29/2024		4					4			1 on 8/29/2024 3 on 8/30/2024	Four items were identified requiring ESC repair/maintenance and completed within the required timeframe.
8/30/2024	0.0"-2.8" - 12 Hours *Scattered strong storms occurred on 8/29/2024	1					1			1 on 8/30/2024	One item was identified requiring ESC 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			
8/20/2024	The Environmental Auditor conducted site evaluations at the following locations: Riddle Road (GAS), Snow Creek Road (CIS), Ramsey Memorial Road (GAS), MVP-FR-321 (CIS/GAS), MVP-FR-320 (CIS), and Timber Ridge Road (GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, and MVP Environmental staff regarding observations related to monitoring Soil Stabilization Blanket (SSB) and upgrading if necessary, removing a Clean Water Diversion (CWD) pipe not addressed during permanent restoration activities, installing enhanced ESC measures at a location where a previous off right of way impact occurred, repairing/installing a higher grade SSB at a stream crossing.  The Environmental Auditor evaluated S-B6 east of Riddle Road where SWM measures repairs and permanent slope restoration was occurring. Based on the evaluation, it appeared that the ESC and SWM measures were properly repaired/reinstalled. The Environmental Auditor recommended the slope above S-B6 and upgrading the SSB as necessary. The Environmental Auditor evaluated S-H37 and W-H17 west of MVP-FR-320 where previous environmental impacts occurred. It appeared that the ESC measures were repaired at S-H37; however, livestock traffic continues to damage the ESC and SWM measures at and above the stream. At W-H17, it appeared that upslope (off right of way) landowner earth disturbance activities caused the sediment laden runoff to impact the project right of way. The ESC and SWM measures were repaired and sediment removed from the wetland. The Environmental Auditor provided a recommendation to monitor this location and conduct minor regrading and install enhanced ESC measures as necessary. The Environmental Auditor evaluated S-G18 east of Timber Ridge Road where runoff from a previous precipitation event caused streambank erosion resulting in the impact. The Environmental Auditor observed what appeared to be upslope timber harvesting activities which could exacerbate runoff within the stream. The Environmental Auditor recommended monitoring the current SSB and upgrade as necessary.			
8/21/2024	The Environmental Auditor conducted site evaluations at House Rock Road (GAS) and MVP-FR-293.02.							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor evaluated the steep hill between House Rock Road and S-II9 where previous runoff activities cause erosion and slope slippage. At the time of the evaluation the Environmental Auditor observed the ESC measures installed and functional and the soil conditions to be too wet to conduct final restoration repairs. The Environmental Auditor communicated with the LEI, Chief EI, and MVP Environmental staff regarding recommendations to install enhanced sediment control measures above S-II9 if rainfall is forecasted prior to conducting slope restoration activities.			
8/22/2024	The Environmental Auditor conducted a site evaluation at MVP-FR-320 (CIS).							The Environmental Auditor conducted an evaluation at S-H38 to confirm an environmental resource impact identified by the VADEQ the same day. At the time of the evaluation, the Environmental Auditor did not observed any sediment impact to the stream. It should be noted that this stream through the project area was subjected to non project related high flows due to upstream third party earth disturbance activities during 2022. These activities contributed to streambank erosion at two locations within the right of way. The Environmental Auditor communicated with the LEI, Chief EI, and MVP Environmental staff regarding a recommendation to install soil stabilization matting (SSM) where the current SSB is degrading and not in contact with the ground surface.			
8/26/2024	The Environmental Auditor conducted site evaluations at the following locations: US 220 (CIS), Foggy Ridge Road (GAS), MVP-FR-305 (CIS), Iron Ridge Road (CIS), and MVP-FR-303.01 (CIS/GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, and MVP Environmental staff regarding an observation to conduct restabilization activities at a small area within an ATWS.			
8/19/2024 through 9/1/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists and SWPPP VSIRs to be compliant during this reporting period for the Spread I Project.  The Environmental Auditor communicated with the LEI and Environmental Coordinator (EC) regarding observations related to SWPPP VSIR documentation.  The Environmental Auditor communicated with all Spread LEIs on 8/28/2024 regarding the Bi-Weekly reporting period ending on 9/1/2024.							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 I 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 continues to recommend conducting QA/QC on SWPPP VSIRs documentation to ensure the reports are thorough and consistent and coincide with the daily MVP Punchlists.			
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										



MOUNTAIN VALLEY PIPELINE  
SPREAD I  
ENVIRONMENTAL AUDITOR BI-WEEKLY REPORT - 9/2/2024 through 9/15/2024

ENVIRONMENTAL AUDITOR CONTACT INFORMATION  
Joe Crea CPESC, CPSWQ  
Tetra Tech  
661 Andersen Drive, Suite 200, Pittsburgh PA 15220

Report Period Ending: 9/15/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 57 conducted from 9/2/2024 through 9/15/2024 (includes Transco Interconnect Station/H-602/H-603/Laydown Yards): <b>Holiday on 9/2/2024</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 9/2/2024 through 9/15/2024 (includes Carry Over Items from 9/1/2024): <b>32</b>											
Total Number of ODCP Inspections at Laydown Yard 045/046: <b>0; All refueling tanks were removed from MVP-LY-046 on 7/17/2024.</b>											
Total Number of VA DEQ Observations from 9/2/2024 through 9/15/2024: <b>14</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>13</b> (livestock traffic, unauthorized traffic, and landowner traffic)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>0</b>											
Total Number of Off Right of Way Impacts: <b>0</b>											
Total Number of Environmental Resource Impacts: <b>0</b>											
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: <b>0</b>											
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 9/2/2024 through 9/15/2024.											
CARRY OVER ITEMS FROM 9/1/2024											
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
2/21/2024		1	1					1 on 2/22, 2/29, and 4/2/2024 to be completed upon engineer review/redlines			One item was identified as an environmental resource impact at S-F11 (Blackwater River) requiring streambank repair due to water flowing from the dewatering facilities to a natural low point just above the streambank resulting in the bank sloughing. Sediment caused by the streambank sloughing was removed below the streambank. A long term extension request has been approved by the VADEQ on 2/29/2024 to conduct streambank repairs upon engineer review/redlines and agency approvals.
2/22/2024		1	1					1 on 2/22, 2/29, and 4/2/2024 to be completed upon verification by the VADEQ Aquatic Biologist			One item was identified as an environmental resource impact at S-C-19 (Maggodee Creek) requiring streambank repair due to water flowing from dewatering facilities to natural low spots and through existing gullies on the S-C19 streambank. Sediment caused by the streambank erosion was removed. The VADEQ required an extension request until an aquatic biologist from the agency confirms sediment removal and streambank stabilization are adequate.
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
9/2/2024		8					8			8 on 9/3/2024	Eight items were identified requiring ESC repair/maintenance and completed within the required timeframe.
9/3/2024	0.0"-0.8" - 12 Hours Isolated precipitation with locations receiving high intensity/short duration rainfall occurred on 9/2/2024	7				4	3			6 on 9/4/2024 1 on 9/6/2024	Seven items were identified requiring ESC repair/maintenance and completed within the required timeframe. Four of the identified items were caused by third party impacts related to unauthorized traffic, livestock traffic, wildlife traffic, and agricultural equipment traffic.
9/4/2024		2				1	1			2 on 9/5/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic.
9/5/2024		2				1	1			2 on 9/5/2024	Two items were identified requiring ESC and SWM repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic.
9/10/2024		2				2				2 on 9/11/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. Both items were caused by third party impacts related to unauthorized traffic.
9/12/2024		5				1	4			2 on 9/12/2024 3 on 9/13/2024	Five items were identified requiring ESC repair/maintenance and completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic.
9/13/2024		4				2	2			2 on 9/13/2024	Four items were identified requiring ESC repair/maintenance and two were completed within the required timeframe. Two of the identified items were caused by third party impacts related to unauthorized traffic and livestock traffic. <b>The remaining two items have three days to be completed within the required timeframe.</b>

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
9/9/2024		1					1			1 on 9/9/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
9/10/2024		3					3			3 on 9/11/2024	Three items were identified requiring ESC repair/maintenance and completed within the required timeframe.
9/11/2024		2					2			2 on 9/12/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe.
9/12/2024		4				2	2	1 on 9/13/2024 long term extension to be completed upon landowner permission	1 on 9/13/2024	2 on 9/13/2024	Four items were identified requiring ESC repair/maintenance and three were completed within the required timeframe. Two of the identified items were caused by third party impacts related to landowner activities. The remaining item received a long term extension request approval until landowner permission is granted.
9/13/2024		4					4			1 on 9/13/2024	Four items were identified requiring ESC repair/maintenance and one was completed within the required timeframe. <b>The remaining three items have three days to be completed within the required timeframe.</b>
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			
9/5/2024	The Environmental Auditor conducted site evaluations at the following locations: Webster Road (GAS), MVP-FR-315 (CIS/GAS), MVP-FR-313.01 (GAS), Farm View Road (GAS), MVP-FR-302(GAS), and Brick Church Road (CIS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, Environmental Coordinator (EC) and MVP Environmental staff regarding observations and recommendations related to monitoring a streambank where vegetation is minimal and the Soil Stabilization Blanket (SSB) is degrading.			
9/9/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-FR-293.02 (access road), Cahas Mountain Road #2 (GAS), House Rock Road (GAS), Leaning Oak Road (CIS/GAS), MVP-FR-295.01 (CIS/GAS), Green Level Road (CIS), and MVP-FR-300 (CIS/GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, EC, and MVP Environmental staff regarding observations and recommendations related to installing runoff control measures on an access road where washout continues to be an issue, landowner agricultural activities on the right of way adjacent to an environmental resource, and monitoring a streambank.			
9/11/2024	The Environmental Auditor conducted site evaluations at the following locations: Transco Interconnect Station, H-602, Mill Creek Road (CIS/GAS), Riddle Road (GAS), MVP-PI-336.01 (CIS), and Anderson Mill Road #1 (CIS/GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, and MVP Environmental staff regarding observations and recommendations related to monitoring a streambank where vegetation is minimal and the SSB is degrading, conducting restabilization activities where bare/disturbed areas were observed, and monitoring a section of the right of way where potential erosion could occur along the inside edge of the perimeter sediment control along the slope. The Environmental Auditor also communicated with the LEI regarding permanent/MLV access roads where permanent SWM measures will need to be installed per the SWM Plan requirements.			
9/2/2024 through 9/15/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists and SWPPP VSIRs to be compliant during this reporting period for the Spread I Project.  The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations related to SWPPP VSIR documentation that includes photo logs not covering significant portions of the right of way during SWPPP inspections.  The Environmental Auditor communicated with all Spread LEIs on 9/10/2024 regarding the Bi-Weekly reporting period ending on 9/15/2024. The Environmental Auditor provided feedback on the following: ensuring that corrective action items noted in the VSIRs are added to the respective daily MVP Punchlists; enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the Annual Standards and Specifications due to concentrated flow resulting in erosion and/or off right of way/environmental resource impacts, properly embedding/anchoring SSB per the required ESC Plans, and inspecting compost filter sock for undermining subsequently resulting in erosion.							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 I 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: 9/29/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: <b>52</b> conducted from 9/16/2024 through 9/29/2024 (includes Transco Interconnect Station/H-602/H-603/Laydown Yards): <b>SWPPP inspections postponed on 9/17/2024 and 9/27/2024 due to hazardous right of way conditions as a result of a tropical system and a storm system from remnants of Hurricane Helene, respectively.</b>											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations from 9/16/2024 through 9/29/2024 (includes Carry Over Items from 9/15/2024): <b>139</b>											
Total Number of ODCP Inspections at Laydown Yard 045/046: <b>0; All refueling tanks were removed from MVP-LY-046 on 7/17/2024.</b>											
Total Number of VA DEQ Observations from 9/16/2024 through 9/29/2024 (includes Carry Over Items from 9/15/2024): <b>10</b>											
Total Number of Landowner/Third Party Reported Complaints: <b>0</b>											
Total Number of Right of Way Impacts Caused by Third Parties: <b>12</b> (livestock traffic and unauthorized traffic)											
Total Number of Right of Way Impacts Caused by Weather Related Damage (damaged ESC measures from fallen debris): <b>1</b>											
Total Number of Off Right of Way Impacts: <b>3</b> ( <b>1.</b> On 9/19/2024, the EI observed an off right of way sediment impact within an upland area east of Ramsey Memorial Road. On 9/18/2024, a storm event from a tropical system coupled with existing saturated conditions produced approximately 2.6 inches of rainfall within 1.5 hours causing ESC measures to become overwhelmed. The VADEQ was immediately contacted, landowner access granted, temporary ESC measures installed, sediment removed, the area stabilized within the required timeframe. It appears that this impact was caused by runoff from topographic conditions and permanent waterbar end treatments. Due to redundant issues on this slope, a long term plan is being developed to implement enhanced ESC and SWM measures. No environmental resources were impacted. <b>2-3.</b> On 9/26/2024, the LEI and Environmental Auditor observed an off right of way sediment impact within upland area east of Ramsey Memorial Road and the EI observed an off right of way impact within an upland area east of Armstrong Road. On 9/25/2024, a strong storm event coupled with previous rainfall and saturated conditions produced approximately 2.2 inches of rainfall in two hours causing ESC and SWM measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, ESC measures repaired/maintained, sediment removed, and the areas stabilized within the required timeframe. No environmental resources were impacted). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
Total Number of Environmental Resource Impacts: <b>2</b> ( <b>1.</b> On 9/25/2024 the EI observed an environmental resource impact at S-G13 east of Ramsey Memorial Road. From 9/24/2024 into early 9/25/2024 a storm event coupled with previous rainfall and saturated conditions produced approximately 2.8 inches of rainfall in 12 hours causing severe erosion on the slope east of the stream resulting in ESC measures becoming overwhelmed. The VADEQ was immediately notified, ESC measures repaired/maintained, sediment removed, and the streambank stabilized. On 9/26/2024, the Environmental Auditor met onsite with the LEI to review this area and redlines are being developed to implement enhanced ESC/SWM measures due to redundant issues. The LEI submitted an Agency Compliance Form (Problem Area Report #1052) on 9/25/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. <b>2.</b> On 9/28/2024, the EI observed and environmental resource impact at S-II9 east of House Rock Road. From 9/26/2024 through 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall and saturated conditions produced approximately 2.5 inches of rainfall in 48 hours causing a slope to slough resulting in ESC measures becoming overwhelmed. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the area stabilized within the required timeframe. It should be noted that an engineering review is underway to implement enhanced ESC measures due to redundant issues occurring on the slope. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration). <b>Refer to Environmental Inspector Observations and Environmental Auditor Field Observations and Recommendations for further discussion.</b>											
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: <b>0</b>											
<b>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 9/16/2024 through 9/29/2024.</b>											
CARRY OVER ITEMS FROM 9/15/2024											
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
2/21/2024		1	1				1	1 on 2/22, 2/29, and 4/2/2024 to be completed upon engineer review/redlines			One item was identified as an environmental resource impact at S-F11 (Blackwater River) requiring streambank repair due to water flowing from the dewatering facilities to a natural low point just above the streambank resulting in the bank sloughing. Sediment caused by the streambank sloughing was removed below the streambank. A long term extension request has been approved by the VADEQ on 2/29/2024 to conduct streambank repairs upon engineer review/redlines and agency approvals.
2/22/2024		1	1				1	1 on 2/22, 2/29, and 4/2/2024 to be completed upon verification by the VADEQ Aquatic Biologist			One item was identified as an environmental resource impact at S-C-19 (Maggodee Creek) requiring streambank repair due to water flowing from dewatering facilities to natural low spots and through existing gullies on the S-C19 streambank. Sediment caused by the streambank erosion was removed. The VADEQ required an extension request until an aquatic biologist from the agency confirms sediment removal and streambank stabilization are adequate.
9/12/2024		1 (VADEQ)					1	1 on 9/13/2024 long term extension to be completed upon landowner permission			A long term extension request was approved via the VADEQ until landowner permission is granted to conduct repair/maintenance.
9/13/2024		5 (3 VADEQ items)					5			5 on 9/16/2024	Five items were identified requiring ESC repair/maintenance and completed within the required timeframe.

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
9/16/2024		5				2	3			2 on 9/16/2024 3 on 9/19/2024	Five items were identified requiring ESC repair/maintenance and completed within the required timeframe. Two of the identified items were caused by third party impacts related to livestock traffic.
9/18/2024	0.7"-3.5" - 36 Hours *A storm event from a tropical system with intervals of high intensity occurred from 9/17/2024 through 9/18/2024	2					2	1 on 9/21 and 9/26/2024 to be completed on 10/4/2024 (engineering review/redlines)		1 on 9/19/2024	Two items were identified requiring ESC repair/maintenance and one was completed within the required timeframe. <b>One item received extension request approvals due to an engineering review to implement enhanced ESC measures on a slope where redundant issues occurred due to concentrated flow conditions.</b>
9/19/2024	0.2"-2.6" - 1.5 Hours *A storm event from a tropical system with locations receiving high intensity/short duration rainfall occurred late on 9/18/2024	39		1		2	37 (includes off right of way impact)	3 on 9/21 and 9/26/2024 to be completed on 10/4/2024 due to wet conditions and engineering review/redlines		18 on 9/20/2024 18 on 9/21/2024	Thirty-nine items were identified requiring ESC and SWM repair/maintenance and 36 were completed within the required timeframe. Two of the identified items were caused by third party impacts related to livestock traffic and unauthorized traffic. One item was identified as an off right of way sediment impact approximately 50 feet within an upland area east of Ramsey Memorial Road. On 9/18/2024, a storm event from a tropical system caused ESC measures to become overwhelmed. The VADEQ was immediately notified, landowner access granted, sediment removed, the impacted area stabilized, and temporary ESC measures installed. It appears that this impact was caused by runoff from upslope topographic conditions and permanent waterbar end treatments. Due to ongoing issues on this slope, a long term plan is being developed to enhance the current ESC and SWM measures. No environmental resources were impacted. The LEI submitted an Agency Compliance Form (Problem Area Report #1047) on 9/19/2024.  <b>Three items received extension request approvals due to engineering reviews to implement enhanced ESC measures where redundant issues are occurring due to topographic conditions and permanent waterbar end treatments contributing to the impacts.</b>
9/20/2024	0.0"- 0.3" - 1 Hour *Isolated strong storms occurred on late 9/20/2024	6					6	5 on 9/22/2024 to be completed on 9/26/2024 due to wet conditions		1 on 9/20/2024 5 on 9/23/2024	Six items were identified requiring ESC repair/maintenance and completed within the required timeframe.
9/23/2024		2				2				2 on 9/26/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. These items were caused by third party impacts related to unauthorized traffic.
9/24/2024		2				2				2 on 9/26/2024	Two items were identified requiring ESC repair/maintenance and completed within the required timeframe. These items were caused by third party impacts related to unauthorized traffic.
9/25/2024	0.8"-3.6" - 24 Hours *Strong storm events with heavier intensity throughout a 12 hour period occurred from 9/24/2024 into 9/25/2024	45	1			2	43 (includes environmental resource impact)	36 on 9/27/2024 to be completed on 10/1/2024 due to wet conditions and engineering review/redlines	2 on 9/26/2024	6 on 9/26/2024 1 on 9/27/2024 8 on 9/28/2024 (extension requests)	Forty-five items were identified requiring ESC and SWM repair/maintenance and 17 were completed within the required timeframe. Two items were caused by third party impacts related to livestock traffic and unauthorized traffic. One item was identified as an environmental resource impact at S-G13 east of Ramsey Memorial Road. From 9/24/2024 into 9/25/2024, strong storm events with intervals of high intensity/short duration rainfall coupled with existing saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, sediment removed, ESC measures temporarily repaired, and the streambank stabilized. Based on a field evaluation conducted by the Environmental Auditor on 9/26/2024, it appears that this impact was caused by runoff from upslope topographic conditions that included discharge from the permanent waterbar end treatments. Due to redundant issues on this slope, a long term plan is being developed that entails redlines to the current ESC/SWM measures and enhancing the ESC measures. The LEI submitted an Agency Compliance Form (Problem Area Report #1052) on 9/25/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration. Refer to Environmental Auditor Field Observations for further discussion.  <b>Twenty-eight items received extension request approvals due to wet/saturated conditions.</b>
9/26/2024	0.6"-2.2" - 12 Hours *A strong storm event with intervals of high intensity short duration rainfall occurred throughout 9/25/2024	27		2		1	26 (includes off right of way impacts)	20 on 9/28/2024 to be completed on 10/2/2024 due to wet conditions and engineering review/redlines	1 on 9/26/2024 1 on 9/27/2024	1 on 9/26/2024 4 on 9/28/2024 5 on 9/29/2024	Twenty-seven items were identified requiring ESC and SWM repair/maintenance and 12 were completed within the required timeframe. One of the identified items was caused by third party impacts related to unauthorized traffic. Two of the items were identified as off right of way sediment impacts approximately 100 feet and 20 feet within upland areas east of Ramsey Memorial Road and east of Armstrong Road, respectively. On 9/25/2024, a strong storm event with high intensity/short duration rainfall coupled with previous rainfall and saturated conditions caused ESC measures to become overwhelmed. The VADEQ was immediately notified, temporary ESC measures installed, landowner access granted, sediment removed, and the areas stabilized at both locations within the required timeframe. It appears that the impact at Ramsey Memorial Road was caused by topographic conditions and permanent waterbar end treatments. Due to ongoing issues on this slope, the Environmental Auditor provided recommendations and redlines are currently being developed to enhance ESC measures and extend waterbars across the full width of the right of way (pending VADEQ approval). No environmental resources were impacted. The LEI submitted Agency Compliance Forms (Problem Area Reports #1061 and #1062, respectively) on 9/26/2024.  <b>The 15 remaining items received extension request approvals due to wet/saturated conditions.</b>
9/28/2024	0.4" - 2.0" - 24 Hours *A storm event from remnants of Hurricane Helene with intervals of high intensity/short duration rainfall continued through 9/27/2024	7	1		1	1	6 (includes environmental resource impact)		1 on 9/29/2024		Seven items were identified requiring ESC repair/maintenance and one was completed within the required timeframe. One of the identified items was caused by third party impacts related to livestock traffic. One item was caused by weather related damage related to a fallen tree. One item was identified as an environmental resource impact at S-I19 east of House Rock Road. On 9/27/2024, a storm event from remnants of Hurricane Helene coupled with previous rainfall and existing saturated conditions caused a slope to slough resulting in the ESC measures to become overwhelmed. The VADEQ was immediately notified, ESC measures temporarily repaired, sediment removed, and the streambank stabilized within the required timeframe. It should be noted that an engineering review is underway to implement enhanced ESC measures due to redundant issues occurring on the slope. The LEI submitted an Agency Compliance Form (Problem Area Report #1069) on 9/28/2024. The MVP Environmental staff is preparing a Courtesy Notice of Force Majeure Declaration.  <b>The six remaining items have three days to be completed within the required timeframe.</b>

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
9/21/2024		1					1	1 on 9/22/2024 to be completed on 9/26/2024		1 on 9/23/2024	One item was identified requiring ESC repair/maintenance and completed within the required timeframe.
9/26/2024	0.6"-2.2" - 12 Hours *A strong storm event with intervals of high intensity short duration rainfall occurred throughout 9/25/2024	2					2	1 on 9/28/2024 to be completed on 10/2/2024 due to saturated conditions	1 on 9/27/2024		Two items were identified requiring ESC repair/maintenance and one was completed within the required timeframe. <b>The remaining item received an extension request approval due to wet/saturated conditions.</b>
9/28/2024	0.4" - 2.0" - 24 Hours *A storm event due to remnants of Hurricane Helene with intervals of high intensity/short duration rainfall continued through 9/27/2024	3					3				Three items were identified requiring ESC repair/maintenance and have three days to be 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			
9/16/2024	The Environmental Auditor conducted site evaluations at the following locations: MVP-LY-045/046, MVP-ANC-006, Indian Cave Road (CIS/GAS), MVP-FR-322 (CIS/GAS), Bar Ridge Road (CIS), and Ramsey Memorial Road (GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, Environmental Coordinator (EC), and MVP Environmental staff regarding an observation related to erosion occurring within the right of way due to undermining at a section of compost filter sock.			
9/24/2024	The Environmental Auditor conducted site evaluations at the following locations: House Rock Road (GAS), Monty Road (CIS/GAS), Grassy Hill Road (GAS), and Brick Church Road (GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, EC, and MVP Environmental staff regarding a recommendation to enhance sediment control measures directly above stream S-II9 where redundant slope issues are occurring due to steep topographic conditions.			
9/26/2024	The Environmental Auditor conducted site evaluations at the following locations: Ramsey Memorial Road (GAS), MVP-FR-321.01 (CIS/GAS), Jacks Creek Road (CIS/GAS), and MVP-FR-320 (CIS/GAS).							The Environmental Auditor observed locations where the ESC and SWM measures appeared to be installed and functional at the time of the evaluation. The Environmental Auditor communicated with the LEI, Chief EI, EC, and MVP Environmental staff regarding observations and recommendations related to conducting restabilization activities where vegetative growth is minimal to none, ESC measures repair/maintenance, and properly installing enhanced soil stabilization blanket (SSB) where the current SSB is degrading. The Environmental Auditor met onsite with the LEI to evaluate S-G13 and the slope to the east where redundant issues have occurred due to runoff from topographic conditions (draw) and the permanent waterbar end treatments. The Environmental Auditor and LEI reviewed potential solutions to minimize upslope runoff and enhance the ESC measures to comply with Section 3.2 of the Annual Standards and Specifications and the ESC/SWM Plan requirements. The Environmental Auditor communicated with the LEI, Chief EI, and MVP Environmental staff regarding the site evaluation and proposed redlines to be developed. The Environmental Auditor also communicated continued concerns regarding ESC Plan redlines submitted on 8/2/2024 not implemented for the slope west of S-G15 and a natural drainage feature where erosion is evident due to the recent rainfall events.			
9/16/2024 through 9/29/2024	The Environmental Auditor reviewed and noted the daily MVP Punchlists and SWPPP VSIRs to be compliant during this reporting period for the Spread I Project.  The Environmental Auditor communicated with the LEI, EC, Chief EI, and MVP Environmental staff regarding observations related to SWPPP VSIR documentation.  The Environmental Auditor communicated with all Spread LEIs on 9/24/2024 regarding the Bi-Weekly reporting period ending on 9/29/2024, Partial Bi-Weekly reporting period (End of Q3 2024) ending on 9/30/2024, and the Q3 2024 reporting period ending on 9/30/2024. The Environmental Auditor provided feedback/recommendations on the following: enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the AS&S and ESC requirements due to steep slopes and concentrated flow conditions resulting in erosion, communicating with the contractor to upgrade the SSB where low grade types are not efficient on steep slopes, concentrated flow conditions, and exhibit low functional longevity, and monitor areas where there is minimal to no vegetative growth and conducted restabilization activities as necessary (includes adding additional lime and fertilizer). It should be noted that the Environmental Auditor also communicated with the MVP Environmental staff on occasions to consider adding biotic soil amendments where soils exhibit low fertility to assist with developing an organic layer over time.							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 I 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: 9/30/2024  
Report Prepared By: Joe Crea

SUMMARY OF FINDINGS											
Total Number of SWPPP Inspections: 5 conducted on 9/30/2024 (includes Transco Interconnect Station/H-602/H-603/Laydown Yards)											
Total Number of Environmental Inspector (EI) Erosion and Sediment Control (ESC) Observations on 9/30/2024 (includes Carry Over Items from 9/29/2024): 55											
Total Number of ODCP Inspections at Laydown Yard 045/046: 0; All refueling tanks were removed from MVP-LY-046 on 7/17/2024.											
Total Number of VA DEQ Observations on 9/30/2024 (includes Carry Over Items from 9/30/2024): 5											
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 on 9/30/2024.											
CARRY OVER ITEMS FROM 9/29/2024											
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
2/21/2024		1	1				1	1 on 2/22, 2/29, and 4/2/2024 to be completed upon engineer review/redlines			One item was identified as an environmental resource impact at S-F11 (Blackwater River) requiring streambank repair due to water flowing from the dewatering facilities to a natural low point just above the streambank resulting in the bank sloughing. Sediment caused by the streambank sloughing was removed below the streambank. A long term extension request has been approved by the VADEQ on 2/29/2024 to conduct streambank repairs upon engineer review/redlines and agency approvals.
2/22/2024		1	1				1	1 on 2/22, 2/29, and 4/2/2024 to be completed upon verification by the VADEQ Aquatic Biologist			One item was identified as an environmental resource impact at S-C-19 (Maggodee Creek) requiring streambank repair due to water flowing from dewatering facilities to natural low spots and through existing gullies on the S-C19 streambank. Sediment caused by the streambank erosion was removed. The VADEQ required an extension request until an aquatic biologist from the agency confirms sediment removal and streambank stabilization are adequate.
9/12/2024		1 (VADEQ)					1	1 on 9/13/2024 long term extension to be completed landowner permission			A long term extension request was approved via the VADEQ until landowner permission is granted to conduct repair/maintenance.
9/18/2024	0.7"-3.5" - 36 Hours *A storm event from a tropical system with intervals of high intensity occurred from 9/17/2024 through 9/18/2024	1					1	1 on 9/21 and 9/26/2024 to be completed on 10/4/2024 due to engineering review/redlines			One item received extension request approvals due to an engineering review to implement enhanced ESC measures on a slope where redundant issues occurred due to concentrated flow conditions.
9/19/2024	0.2"-2.6" - 1.5 Hours *Strong storms with locations receiving high intensity/short duration rainfall occurred late on 9/18/2024	3					3	3 on 9/21 and 9/26/2024 to be completed on 10/4/2024 due to wet conditions and engineering review/redlines			Three items received extension request approvals due to engineering reviews to implement enhanced ESC measures where redundant issues are occurring due to topographic conditions and permanent waterbar end treatments contributing to concentrated runoff.
9/25/2024	0.8"-3.6" - 24 Hours *Strong storm events with heavier intensity within a 12 hour period occurred from 9/24/2024 into 9/25/2024	28					28	15 on 9/27/2024 to be completed on 10/1/2024 due to wet conditions  13 on 9/27 and 9/30/2024 to be completed on 10/4/2024 due to wet conditions		13 on 9/30/2024	Twenty-eight items were identified requiring ESC and SWM repair/maintenance and 13 were completed within the required timeframe. <b>Fifteen items received extension request approvals due to wet/saturated conditions.</b>
9/26/2024	0.6"-2.2" - 12 Hours * A storm event with intervals of high intensity short duration rainfall occurred throughout 9/25/2024	16 ( 1 VADEQ item)					16	16 on 9/28/2024 to be completed on 10/2/2024 due to wet conditions			<b>Sixteen remaining items received extension request approvals due to wet/saturated conditions.</b>
9/28/2024	0.4" - 2.0" - 24 Hours *A storm event from remnants of Hurricane Helene with intervals of high intensity/short duration rainfall continued through 9/27/2024	9 (3 VADEQ items)					9	9 on 9/30/2024 to be completed on 10/4/2024 due to wet conditions			<b>Nine items have three days to be completed within the required timeframe.</b>

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
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
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			
9/30/2024	<p>The Environmental Auditor reviewed and noted the daily MVP Punchlists and SWPPP VSIRs to be compliant during this reporting period for the Spread I Project.</p> <p>The Environmental Auditor communicated with all Spread LEIs on 9/24/2024 regarding the Partial Bi-Weekly reporting period (End of Q3 2024) ending on 9/30/2024 and the Q3 2024 reporting period ending on 9/30/2024. The Environmental Auditor provided feedback/recommendations on the following: enhancing ESC measures (i.e. SSB) where straw mulch or hydraulic applications are not effective measures per Section 3.2 of the AS&amp;S and ESC requirements due to steep slopes and concentrated flow conditions resulting in erosion, communicating with the contractor to upgrade the SSB where low grade types are not efficient on steep slopes, concentrated flow conditions, and exhibit low functional longevity, and monitor areas where there is minimal to no vegetative growth and conducted restabilization activities as necessary (includes adding additional lime and fertilizer). It should be noted that the Environmental Auditor also communicated with the MVP Environmental staff on occasions to consider adding biotic soil amendments where soils exhibit low fertility to assist with developing an organic layer over time.</p>							<p>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 I 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.</p>			
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										