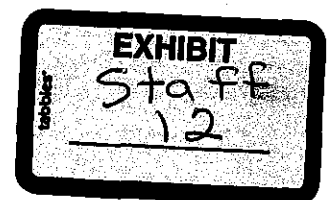


BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

DOCKET NO. HP14-002

**IN THE MATTER OF THE APPLICATION OF DAKOTA ACCESS, LLC FOR AN
ENERGY FACILITY PERMIT TO CONSTRUCT THE DAKOTA ACCESS PIPELINE**

**Direct Testimony of Ann Curnow
On Behalf of the Staff of the South Dakota Public Utilities Commission
July 6, 2015**



1 Q: Please state your name and business address.
2
3 A: Ann M. Curnow
4
5 Q: Describe your educational background.
6
7 A: B.S. Geological Engineering South Dakota School of Mines
8
9 Q: By whom are you now employed?
10
11 A: Natural Resource Group, an ERM Group Company
12
13 Q: What work experience have you had that is relevant to your involvement on
14 this project?
15
16 A: Over 25 years of experience in air quality consulting for industry, institutions, and
17 government.
18
19 Q: What Professional Credentials do you hold?
20
21 A: B.S. Geological Engineering (1987)
22
23 Q: What is the purpose of your testimony?
24
25 A: Review assessment of air permitting requirements associated with the
26 construction of the Dakota Access pipeline and their proposed mitigation
27 measures to reduce air quality impacts.
28
29 Q: What methodology did you employ?
30
31 A: Technical Review
32
33 Q: Did you review section 21.0 of the Revised Application that addresses the
34 project's impacts to air quality?
35
36 A: Yes.
37
38 Q: Regarding the pump station, do you agree with Dakota Access's statement,
39 "Dakota Access anticipates that no permit will be required?"
40
41 A: Yes. The pump will be electrically driven. The pump station will have a backup
42 power supply for the operation of critical equipment but the power will not be from
43 a fossil-fuel fired generator engine. No stationary combustion sources will be
44 onsite. The only other potential sources of air emissions at the pump station will
45 be volatile organic compounds (VOCs) from the surge tank, maintenance
46 activities, and leaks. The surge tank is used to store product in the event of an

1 upset condition. Since upsets are expected to be infrequent, the annual
2 throughput and resulting emissions will be low. Additionally, emissions from
3 maintenance activities and leaks will also be low. Emissions at the pump station
4 are expected to be below permitting thresholds.
5

6 **Q: Does Dakota Access's proposed construction techniques and mitigation**
7 **measures adequately minimize fugitive particulate emissions?**
8

9 A: Yes. Dakota Access proposes to minimize exposed soil areas, reduce vehicle
10 driving speeds, and water the ROW as needed.
11

12 **Q: Do you have any additional recommendations for Dakota Access to further**
13 **mitigate the impacts the project may have on Air Quality?**
14

15 A: Yes.

- 16 • Require that the primary contractor ensure that all construction equipment is
17 properly tuned and maintained.
- 18 • Minimize idling.
- 19 • Evaluate the use of a chemical suppressant in addition to water for dust
20 control. Any chemicals used for dust suppression should be reviewed and
21 approved by all applicable regulatory agencies.
- 22 • The water truck should be onsite at all times.
- 23 • Vehicles transporting materials with significant dust content to/from the site
24 should be covered with dustsheets.

25
26 **Q: Does this conclude your testimony?**
27

28 A: Yes.



an ERM Group company

Ann Curnow

Email: ann.curnow@NRG-LLC.com

Ann is a Senior Consultant in Natural Resource Group, LLC's (NRG) Minneapolis office. She has been working in the environmental field since 1988, specializing in providing air permitting and regulatory compliance services for industrial, institutional, and utility clients across the United States. Ann has served as the Project Manager for multiple air permitting projects, where she was responsible for obtaining all necessary permit authorizations, performing environmental reviews, and supporting public hearings.

Selected Project Experience

- Aux Sable Midstream, LLC, Construction Permit, Tioga, North Dakota: Task Manager responsible for compiling the required information to obtain authorization from North Dakota Department of Health (NDDH) to construct a flare at a crude oil pumping station in North Dakota.
- CenterPoint Energy, Capped Permit Application, Burnsville, MN. Compiled documentation to obtain Capped Permit for CenterPoint's Dakota Station to replace their existing Registration D permit issued by the MPCA. Dakota Station is a liquid natural gas and propane storage and transmission facility.
- CenterPoint Energy, RICE Compliance, Project involved developing documentation of initial and ongoing compliance with applicable requirements for corporate inventory of reciprocating internal combustion engines.
- City of Fresno, Waste Gas Turbine Permitting, Fresno, California: Task Manager responsible for completing the air quality analysis and permitting for a waste gas combustion turbine for the City of Fresno. The project was located in a serious non-attainment area for ozone and was under the jurisdiction of the San Joaquin Valley Air Pollution Control District.
- Cronus Ammonia and Urea Plant, Application for Construction Permit/Prevention of Significant Deterioration (PSD) Approval, Tuscola, Douglas County, Illinois. Prepared a PSD construction permit application for a green field facility for the conversion of natural gas to urea and ammonia. The application included completing a BACT review for all criteria pollutants and GHGs.
- Heartland Petroleum, Environmental Review and Permitting, Columbus, Ohio: Completed a compliance review and past releases of air emissions for the oil re-refinery facility as part of satisfying a court order.
- NRG Thermal, Dover Energy Center, Dover, Delaware: Task Manager responsible for preparing and submitting a major permit amendment to allow the construction of a combustion turbine and package gas boilers at an existing power plant.
- ONEOK, Identification of Air Permitting and Regulatory Requirements, Task Manager responsible for preparing a matrix of federal and state permitting and regulatory requirements for petroleum storage tanks.
- Plains Gas Solutions, LLC, Patterson Gas Processing Plant, April 2013, Patterson, Saint Mary Parish, Louisiana. Task manager responsible for preparing a Part 70 permit application for the installation of six compressor engines at an existing gas processing plant. The additional compressor capacity changed the status of the facility from a minor source of air emissions to a major source of air emissions requiring a Part 70 permit.



an ERM Group company

Ann Cunrow
Page 2 of 2

- Plains Marketing L.P., Moss Point Rail Project, Moss Point Mississippi: Task Manager responsible for preparing the application to construct and operate a petroleum storage and transfer facility in Mississippi.
- Seneca Resources East, Pennsylvania Department of Environmental Protection (PADEP) annual emission inventory and annual GHG reporting for their exploration and production (E&P) and midstream operations, PADEP GP-5 and Request for Determination (RFD) Permits for compressor engines, GHG Monitoring Plan and regulatory review in Pennsylvania and New York: Project Team Member responsible for reviewing the reports for accuracy.
- US Development Group, Minor Source Permit, New Town, North Dakota: Task Manager responsible for preparing and submitting a minor source permit application for a crude oil truck to rail transportation facility in Mountrail County, North Dakota. Because the site location was within the boundaries of a Fort Berthold Indian Reservation the EPA Region 8 was the permitting authority.

Education and Training

- B.S., Geological Engineering, South Dakota School of Mines and Technology, Rapid City, South Dakota, 1987