

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.