

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION OF NAVIGATOR HEARTLAND
GREENWAY, LLC FOR A PERMIT UNDER THE SOUTH DAKOTA ENERGY
CONVERSION AND TRANSMISSION FACILITIES ACT TO CONSTRUCT THE
HEARTLAND GREENWAY PIPELINE IN SOUTH DAKOTA**

DOCKET NO. HP22-002

**Direct Testimony of Adam DiAntonio
On Behalf of the Staff of the South Dakota Public Utilities Commission
May 25th, 2023**

1 **Q: Please state your name and business address.**
2
3 A: Adam DiAntonio, 75 Valley Stream Parkway, Suite 200, Malvern Pennsylvania
4 19355
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6 **Q: Describe your educational background.**
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8 A: I received my Bachelor of Science degree in Chemical Engineering from the
9 Pennsylvania State University.
10
11 **Q: By whom are you now employed?**
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13 A: I have been employed by Environmental Resources Management, Inc. since July
14 2012.
15
16 **Q: What work experience have you had that is relevant to your involvement on
17 this project?**
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19 A: I have 10 years' experience in air quality consulting assisting energy companies
20 with the air quality permitting for large natural gas pipeline facilities. My experience
21 includes a broad range of air compliance, permitting, and climate change projects.
22 I have experience with United States Environmental Protection Agency's
23 Greenhouse Gas (GHG) Reporting Program, New Source Performance
24 Standards, National Emission Standards for Hazardous Air Pollutants, Prevention
25 of Significant Deterioration, New Source Review (NSR), and Non-Attainment NSR
26 regulations including applicability determinations. This experience includes US
27 Title V and state-only air quality permitting including GHG and criteria pollutant
28 Best Available Control Technology and Reasonable Available Control Technology
29 analyses, Lowest Achievable Emission Rate analyses, and emission source test
30 planning and results evaluation. I've served as project manager for the air quality
31 analysis and review portion of interstate natural gas pipeline projects reviewed by
32 the Federal Energy Regulatory Commission on multiple occasions for projects in
33 the Mid-Atlantic region of the United States.
34
35 **Q: What is the purpose of your testimony?**
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37 A: To review the assessment of air quality permitting requirements provided in the
38 application associated with the construction of the Navigator Heartland Greenway
39 Pipeline System.
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41 **Q: Did you review sections 6.11 of Navigator's Application that addresses the
42 project's impacts to air quality?**
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44 A: Yes. I reviewed Section 6.11 – Air Quality of the Navigator application where the
45 applicant summarized the potential air quality impacts of the project including
46 fugitive and mobile source emissions during construction.

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Q: In your opinion, did Navigator properly address ARSD 20:10:22:21?

A: Yes. Navigator asserted in Section 6.11 of the application that air permitting requirements for proposed facilities will be fully assessed to identify the required air quality permits. Navigator subsequently responded that no aboveground facilities subject to air permitting are being constructed in South Dakota (See Applicant’s Responses to Staff’s Fifth Set of Data Requests). Potential emissions from construction and mobile sources are not subject to stationary source air quality permitting. Based on this information, the proposed pipeline will comply with all air quality standards and regulations.

Q: Did you find Navigator’s analysis on potential impacts to Air Quality consistent with industry standards and complete?

A: Typically, potential Air Quality impacts from stationary sources, construction, and operation are quantified and compared versus relevant state and federal permitting or impact thresholds for pipelines. The launcher and receiver site and mainline valves proposed in South Dakota for this project are electric powered, and therefore not expected to produce emissions. The US Army Corps of Engineers will review portions of the Navigator project; therefore, a general conformity analysis will be required which will evaluate the impact of construction and operation emissions from the project on the state’s plans to attain and maintain national standards for air quality under the Clean Air Act.

Q: Do Navigator’s proposed construction techniques and mitigation measures adequately minimize fugitive particulate emissions?

A: If implemented, fugitive particulate emissions could be adequately minimized using a combination of the mitigation measures listed in Section 6.11 of the application, which included minimizing exposed soil areas, reducing vehicle driving speeds, and watering the right-of-way, as needed.

Q: Do you have any additional recommendations for Navigator to further mitigate the impacts the project may have on Air Quality? Please explain.

A: Yes. Evaluate and implement construction techniques and mitigation measures to minimize the impact of the project on the surrounding communities during construction and operation. In addition to the measures listed in Section 6.11 of the application, the following should be considered:

- Check that all construction equipment is properly tuned and maintained.
- Minimize idling of construction equipment and vehicles.
- Covers should be utilized on equipment (e.g., dump trucks, roll-off boxes, etc.) when transporting materials with significant dust content for the project.

92 **Q: Did you review sections 1.8 of Navigator’s Application that addresses other**
93 **required permits and approvals?**
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95 A: Yes. I reviewed Section 1.8 – Other Required Permits and Approvals of the
96 Navigator application, which presents applicable state and federal permits for the
97 construction of the pipeline.
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99 **Q: Will Navigator need to obtain any state or federal air quality permits for the**
100 **Project?**
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102 A: The project will not need air quality permits based on the information presented in
103 the application.
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105 **Q: Do you agree with Navigator’s findings and conclusions regarding**
106 **potential impacts on Air Quality?**
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108 A: Based on the information provided in the application, I agree that there are no
109 stationary source air quality permits required for construction and operation of the
110 Heartland Greenway Pipeline System.
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112 **Q: Does this conclude your testimony?**
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114 A: Yes.