

Appendix 19 – South Dakota Dust Control Plan



SUMMIT CARBON
SOLUTIONS

South Dakota Dust Control Plan

Project Name:

SCS Carbon Transport LLC

Midwest Carbon Express (MCE) Project



Revision History

REVISION	DATE	REVISION DESCRIPTION	PREPARED BY:	REVIEWED BY:	APPROVED BY:
1	10/3/2024	Updated Plan	RD	JZ	Summit



SUMMIT CARBON
SOLUTIONS

Acronyms and Abbreviations

BMP	Best Management Practices
CO ₂	Carbon Dioxide
EI	Environmental Inspector
SD DANR	South Dakota Department of Agriculture and Natural Resources
Plan	South Dakota Dust Control Plan
PM	Particulate Matter
PM _{2.5}	PM nominal aerodynamic diameter of 2.5 micrometers or less
PM ₁₀	PM nominal aerodynamic diameter of 10 micrometers or less
Project	Midwest Carbon Express Project
ROW	Right-of-Way
SCS	SCS Carbon Transport LLC



Table of Contents

ACRONYMS AND ABBREVIATIONS	3
1 INTRODUCTION.....	5
2 REGULATORY OVERVIEW	5
2.1 NONATTAINMENT AND MAINTENANCE AREAS	5
2.2 STATE OF SOUTH DAKOTA REGULATIONS	5
2.3 SOUTH DAKOTA PROJECT-SPECIFIC COMMITMENTS.....	5
3 BEST MANAGEMENT PRACTICES	6
4 MONITORING.....	6



1 Introduction

SCS Carbon Transport LLC (SCS) proposes to construct the Midwest Carbon Express Project (Project). The Project, as proposed, includes approximately 2,500 miles of pipeline of various diameters for the transportation of carbon dioxide (CO₂) from industrial facilities across five states (Iowa, Minnesota, Nebraska, North Dakota, and South Dakota) to underground injection control facilities in North Dakota for safe and permanent sequestration. The South Dakota portion of the Project that will be constructed in South Dakota under Public Utility Commission (PUC) jurisdiction will be comprised of approximately 698 miles of pipeline and associated facilities across Beadle, Brookings, Brown, Clark, Codington, Davison, Edmunds, Grant, Hamlin, Hand, Hyde, Kingsbury, Lake, Lincoln, McCook, McPherson, Miner, Minnehaha, Sanborn, Spink, Sully, Turner, and Union counties. The Project in South Dakota is located almost exclusively within rural agricultural areas, limiting the potential for dust-related exposure to non-residential open areas.

This document and its appendices comprise SCS' Dust Control Plan (Plan) for Project construction in South Dakota. This Plan has been prepared to provide best management practices (BMP) that Contractors will employ to control dust to acceptable levels when Project work in South Dakota approaches dwellings, buildings, public roadways, hay production land, livestock grazing land, crop land, and other areas utilized or occupied by people or livestock.

2 Regulatory Overview

2.1 Nonattainment and Maintenance Areas

The Project within South Dakota does not cross any counties currently designated as "Nonattainment" or "Maintenance" by the most recent National Ambient Air Quality Standards (NAAQS) review (2024) which include particulate matter (i.e., PM₁₀ and PM_{2.5} levels).

2.2 State of South Dakota Regulations

Fugitive particulate emissions are managed by the South Dakota Department of Agriculture and Natural Resources (SD DANR), as listed under the South Dakota Codified Law §34A-1-1 through §34A-1-64 and South Dakota Administrative Rule 74:36 Air Pollution Control Program.

No planned Project construction activity in South Dakota will emit discharges that violate these requirements.

Abatement and preventive measures for unpaved roads and unpaved parking areas may include watering, use of dust palliatives, speed control, or other means of equal or greater effectiveness in reducing dust generated during construction.

2.3 South Dakota Project-Specific Commitments

Dust control is used to help mitigate the effects of wind erosion and fugitive dust emissions during construction. Fugitive dust is especially a concern on the right-of-way (ROW) near residential areas, farm dwellings, livestock grazing areas, roads, or when dry and strong wind conditions are present. The ground may be sprayed by watering trucks or sprinklers to control the dust after vegetation is removed from the ROW. Water will not be applied in quantities to cause run off from the ROW.

Contractors will comply with all dust control commitments.



3 Best Management Practices

Implementation of construction and restoration BMPs will be used to mitigate fugitive dust emissions. SCS will also implement operational controls, including the use of a reduced speed limit on unpaved access roads and sweeping or vacuuming paved roadways when Project-related soils are tracked out onto paved surfaces.

Wet suppression, using water, is the predominate method of suppressing fugitive dust on unpaved roads, exposed construction areas, and gravel pads as it causes finer materials to adhere into larger particles. The amount of water required to sufficiently control fugitive dust emissions is dependent on the characteristics of materials (e.g., surface moisture content), ambient conditions (e.g., rainfall, humidity, temperature), activities occurring in the area (e.g., vehicle traffic, weight, speeds), etc.

The contractors will have water trucks available in each spread that will load water from approved permitted sources to spray areas for dust control. Disturbed and trafficable areas will be kept sufficiently damp during working hours in dry conditions to minimize wind-blown or traffic-generated dust emissions. Areas to be watered include, but are not limited to, the following:

- the construction ROW for each pipeline, including additional temporary workspace;
- access roads;
- aboveground facility sites;
- active grading areas;
- unstabilized areas;
- soil stockpiles pending stabilization;
- parking areas; and,
- unpaved county roads near occupied dwellings and at locations where use of such roads is reasonably expected to have an adverse impact to nearby hay production land, livestock, livestock grazing land, or actively growing crops.

The frequency at which water trucks will spray construction areas will vary based on weather and site conditions. More frequent applications may be required in dry conditions and where dust generation is likely. Water will not be applied in quantities to cause run off from the ROW.

Appropriate precautions will be taken to prevent fugitive emissions caused by sand blasting from reaching any residence or public building. Curtains of suitable material will be placed, if necessary, around the sand blasting locations to prevent wind-blown particles from sand blasting operations reaching residences, roads, or public buildings. The construction contractor may propose the use of tackifiers to reduce fugitive dust from spoil piles provided that the product to be utilized has been approved by SCS as well as where its application will occur.

The construction contractor will detail the proposed use of any such substances in its dust control plan and provide copies of the Safety Data Sheets and application procedures.

4 Monitoring

Environmental Inspectors (EI) will have primary responsibility for monitoring and enforcing the implementation of dust control measures by the construction contractor. The EI will also be responsible for ensuring that these measures are effective and proper documentation is maintained. When environmental conditions are dry,



inspection of dust control measures will be conducted daily, and the EI will be responsible for recording the following information daily:

- Weather conditions, including temperature, wind speed, and wind direction;
- Number of water trucks in use;
- Incidents where dust concentration is such that special abatement measures must be implemented;
- Condition of soils (damp, crusted, unstable, other) on the right-of-way and other construction sites;
- Condition of soils (damp, crusted, unstable, other) on access roads;
- Condition of track-out pads;
- Overall status of dust control compliance; and
- Condition of unpaved county roads near occupied dwellings and at locations where use of such roads is reasonably expected to have an adverse impact to nearby hay production land, livestock, livestock grazing land, or actively growing crops.

This information will be incorporated into the EI daily report.

The need for fugitive dust abatement measures will be addressed on a location-by-location basis during periods when wind erosion and dust generation are either occurring or likely to occur. The EI will coordinate with the Contractor on the dust control methods that best accommodate specific site and weather conditions, including the identification of any sensitive receptors in the area (e.g., children, elderly, infirm) that warrant additional precautions.