

APPENDIX C

AGENCY CORRESPONDENCE AND RESPONSES

Bradshaw and Mobley Compressor Sites

On April 25th, MVP Environmental Coordinator Matthew Hoover received a Notice of Violation (NOV) from the West Virginia Department of Environmental Protection (WVDEP). The NOV is associated with the partial inspection completed on April 3, 2018 at the Mobley substation, Bradshaw substation, and the cleared ROW between the two substations. MVP is in the process of writing a response letter to the WVDEP. A copy of the NOV is included in Appendix C.

**WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WV OIL AND GAS CONSTRUCTION STORMWATER PERMIT**

FACILITY NAME:	Mountain Valley Pipeline Project		REG. #	EXPIRE DATE:
PERMITTEE	MOUNTAIN VALLEY PIPELINE, LLC		WVR310667	5/13/2018
ADDRESS/PHONE:	Attn: Matt Hoover 625 LIBERTY AVE, ST 1700 PITTSBURGH, PA 15222			
LOCATION:	Wileyville, WV		Entry Date/Time:	4/3/18 8:30am
COUNTY:	Wetzel		Exit Date/Time:	4/3/18 1:37pm
Site Representative /Phone	Matt Hoover Sr. Environmental Coordinator (412) 258-5627		PHOTOS <input checked="" type="checkbox"/>	
CO-PERMITTEE:		ADDRESS:		
SITE OPERATOR:	Precision Pipeline	ADDRESS:		
PERMITTED ACREAGE	4214	WEATHER:	Rain	LAST INSPECTION:
				N/A
RECEIVING STREAM(S)	Mobley Run> Ohio River			NOV: 1
Regular Mail <input type="checkbox"/>	Certified Mail <input checked="" type="checkbox"/>	Tracking #		
OVERALL FACILITY RATING:	Unsatisfactory	COMPLIANCE OUTCOME	Not Immediately Corrected	

PERMIT / SITE EVALUATION

S-Satisfactory	U-Unsatisfactory	N/A-Not Applicable	N/O-Not Observed	N/D Not Determined	M-Marginal	Y-Yes	N-No
1. PERIMETER CONTROLS	U	9. HOUSEKEEPING/SOLID WASTE	S	17. CONCRETE WASHOUT			N/A
2. DIVERSIONS/DITCH CHECKS	S	10. RECORDS, REPORTS & PLANS ON SITE	S	18. PUBLIC NOTICE SIGN			S
3. SEDIMENT TRAPS/BASINS	S	11. STABLE CONSTRUCTION ENTRANCE	S	19. SEDIMENT LADEN WATER LEAVING SITE			U
4. OUTLET MARKERS	N/A	12. MUD ON ROADWAY/DUST	S	20. CONDITIONS NOT ALLOWABLE			U
5. WASTE/BORROW SITES	S	13. APPROPRIATE BMP'S IMPLEMENTED	S	21. SWPPP/ GPP/PERMIT COMPLIANCE			S
6. OPERATIONS & MAINTENANCE	U	14. FILL SLOPE PROTECTION	U	22. ORDER COMPLIANCE			
7. WATER BARS	N/A	15. DEVICES INSTALLED IN TIMELY MANNER	S	23. OTHER:			
8. STABILIZATION PRACTICES	S	16 DROP INLET PROTECTION	U	24. OTHER:			

COMMENTS DEFICIENCIES AND RECOMMENDATIONS

Partial inspection with Matt Hoover and EI inspectors on 4/3/18. The sites investigated were the Mobley substation, the Bradshaw substation, and the cleared right of way between the two substations. The two substations in Wetzel County have begun earthwork. The pipeline contractor has begun clearing trees by hand. No earthwork has begun. A slip was reported to the hotline near the Bradshaw Station after recent rain events. The project experienced over 4 inches of rain in the week preceding the inspection.

8:43am 39.53532, -80.52691 Bear Run Road leading to Bradshaw Station

(1,6,14,19) After recent rain events hillside slip has breached perimeter controls and sediment-laden water has left the site without going through a control device. Sediment has not impacted any waterbodies. Contractor has installed new perimeter controls below slip area.
Water not being properly channeled down the hill creating rills and picking up sediment.

9:21am 39.53199, -80.53405 Bradshaw Compressor Station

(1,6,14,19) There were three areas where sediment laden water was leaving the site under triple stack silt sock. Water not being properly channeled down the hill was eroding the hillside. Sediment has not impacted any waterbodies. Contractor has installed new perimeter controls below slip area.
Water not being properly channeled down the hill creating rills and picking up sediment.

10:52am 39.56221, -80.54347 Mobley Station (start of project)
(1,16,20) Drop inlets on northern and southern end of site were not protected allowing sediment laden water to enter UT of Mobley Run.

9:21am 39.54882, -80.54671 Pipeline ROW between two substations.
The pipeline sine has been cleared by hand. No earthwork has been done to the area. No deficiencies were noted.

INSPECTOR: Ryan Dague *Ryan Dague* Telephone: 304-238-1220
ext. 3512
Modified: 10-15-2017 JHH

STATE OF WEST VIRGINIA
Department of Environmental Protection
Environmental Enforcement
NOTICE OF VIOLATION

Violation No W18-52-021-RDD

To the Operator or Agent of:

Facility Name: Mountain Valley Pipeline Project Permit No. WVR310667

Permittee or Individual: MOUNTAIN VALLEY PIPELINE, LLC

Located at or near: Wileyville, West Virginia in Wetzel County

Representative: Date: 4/3/18 Time: 1:37pm

Address / phone number: 625 LIBERTY AVE, ST 1700, PITTSBURGH, PA 15222 /

Whereas, an inspection of the above named operation by the undersigned, duly authorized agent of the Secretary, at which the following described condition or practice exists, in violation of Chapter 22, Article 11, Section(s) 1 et. Seq. of the Code of West Virginia and/or Section(s) ___ of the Rules and Regulations and/or Section(s) B,D,G of the Permit referenced above promulgated thereunder in that you:

Have violated the following terms and conditions of WV/NPDES General Water Pollution Control Permit No. WV0116815, Registration No. WVR310667:

- Section G.4.e.2.A.ii.j - Permittee has failed to prevent sediment-laden water from leaving the site without going through silt sock located at the Bradshaw Compressor Station.
- Section G.4.e.2. - Permittee has failed to properly implement controls: lack of drop inlet protection at the Mobley Compressor Station.
- Section G.4.e.2.A.ii.f. - Permittee has failed to protect fill slopes at the Bradshaw Compressor Station.

The following corrective measures were discussed with you at the time of this inspection:

Take measures to correct the aforementioned violations.

- Install properly operate and maintain silt sock to prevent sediment laden water from leaving the site.
- Provide proper inlet protection.
- Install erosion control devices to protect fill slopes.

Within 20 days provide a written response to the inspector named below, at the address indicated, detailing the actions taken to abate this violation.

Received by:

Sent Certified Mail -- 9171999991703840801638

Signature

Title

Duly Authorized Agent /
Inspector

304-238-1220
ext. 3512

Telephone

Ryan.d.dague@wv.gov

E-mail

Send Response to the Inspector at the address indicated below:

WV Department of Environmental Protection
Environmental Enforcement / WW
131 Peninsula St
Wheeling, WV 26003



Disturbed area near the reported slip area.



Reported slip area near Bradshaw Compressor Station.



Concentrated flow eroding slope near slip.



Hillside above slip near Bradshaw Compressor Station.



Slope above slip area.



Sediment laden water leaving site at Bradshaw Compressor Station.



Second site of sediment laden water leaving site at Bradshaw Compressor Station.



Third site of sediment laden water leaving site at Bradshaw Compressor Station.



UT of Mobley Run near Mobley Compressor Station.



Unprotected drop inlet at Mobley Compressor Station.



Sediment laden water leaving site into UT of Mobley Run.



Sediment laden water leaving site into UT of Mobley Run.



Sediment laden water leaving site through drop inlet.



Line clearing off North Fork Road.