



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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April 21, 2016

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Comments on the Environmental Assessment for the Leidy South Project,
Dominion Transmission, Inc. (FERC Docket No. CP15-492-000; DEQ 16-079F).

Dear Secretary Bose:

The Commonwealth of Virginia has completed its review of the above-referenced document. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents submitted under the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. This is in response to the March 2016 Environmental Assessment (EA) (received April 4, 2016) for the above-referenced project. The following agencies participated in the review of this proposal:

Department of Environmental Quality (DEQ)
Department of Conservation and Recreation (DCR)
Department of Transportation (VDOT)

In addition, the Department of Agriculture and Consumer Services, Department of Historic Resources, Department of Game and Inland Fisheries, Department of Health, Department of Forestry, Department of Mines, Minerals, and Energy, the Rappahannock-Rapidan Regional Council, the Northern Virginia Regional Commission, the Virginia Outdoors Foundation, and Fauquier and Loudoun counties were invited to comment on the proposal.

PROJECT DESCRIPTION

The Federal Energy Regulatory Commission (FERC) is considering an application filed by Dominion Transmission, Inc. (Dominion), under section 7(c) of the Natural Gas Act and part 157 of FERC's Rules and Regulations for the proposed construction and operation of the Leidy South Project. The project activities include the construction and operation of additional compression and appurtenant facilities at six existing aboveground facilities in Pennsylvania, Maryland, and Virginia as well as a new metering and regulating (M&R) station. In Virginia, the project involves upgrades and an expansion at the Leesburg Compressor Station (Loudoun County), upgrades at the Quantico Compressor Station (Fauquier County), and the construction of a new M&R station, known as the Stonewall M&R Station, in Loudoun County. The purpose of the project is to provide 0.155 billion cubic feet (Bcf) per day of natural gas to the Mid-Atlantic region. Among multiple customers that this project would supply, Panda Stonewall, LLC is proposing the construction of a 750 megawatt natural gas-fired combined-cycle electric generating power plant located 4 miles south/southeast of Leesburg, Virginia.

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Water Quality and Wetlands. According to the EA (page 21), there are no Environmental Protection Agency (EPA) sole source aquifers in the vicinity of the project area. No water wells or springs are present within 150 feet of the project sites in Virginia and none of the sites are located within wellhead protection areas. The project is not expected to impact groundwater quality as it involves temporary, shallow and localized excavation and grading.

Additionally, no surface waterbodies will be affected by the project (page 22). The projects sites are not located within any designated municipal watersheds, municipal reservoirs, or State Water Protection Areas. No wetlands will be directly impacted by the project (page 23). Dominion will utilize a Spill Prevention Containment and Countermeasure (SPCC) Plan to prevent any secondary offsite impacts to groundwater, waterbodies, and wetlands in the vicinity of the project.

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the Virginia Pollutant Discharge Elimination System Permit (VPDES) regulating point source discharges to surface waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and impoundments. It also serves as §401 certification of the federal Clean Water Act §404 permits for dredge and fill

activities in waters of the U.S. The VWP Permit Program is under the Office of Wetlands and Stream Protection, within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities:

- Clean Water Act, §401;
- Section 404(b)(i) Guidelines Mitigation Memorandum of Agreement (2/90);
- State Water Control Law, Virginia Code section 62.1-44.15:20 *et seq.*; and
- State Water Control *Regulations*, 9 VAC 25-210-10.

1(b) Agency Findings. The disturbance of surface waters or wetlands may require prior approval by DEQ and/or the U.S. Army Corps of Engineers.

The hydrostatic testing associated with this project is not expected to result in a discharge. Instead, the wastewater from the testing will be collected and hauled offsite for disposal at a permitted treatment facility. However, if the plans change and the hydrostatic testing will result in a discharge, Dominion should contact the DEQ Northern Regional Office (NRO) for information on the General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests (VAG83).

Information on this permit is available at the following webpage:

<http://www.deq.virginia.gov/Programs/Water/PermittingCompliance/PollutionDischargeElimination.aspx>

1(c) Agency Recommendation.

- Avoidance and minimization of surface water impacts should be carried out to the maximum extent practicable;
- Coordinate with the U.S. Army Corp of Engineers on surface water impacts, if applicable.

2. Erosion and Sediment Control and Stormwater Management. The EA states that erosion and sediment control measures, consistent with FERC's Plan and Procedures, will be implemented before and after construction to mitigate impacts to soil and water resources (page 20).

2(a) Agency Jurisdiction. The DEQ Office of Stormwater Management administers the following laws and regulations governing construction activities:

- Virginia Erosion and Sediment Control (ECS) Law (§ 62.1-44.15:51 *et seq.*) and Regulations (9VAC25-840);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*);
- Virginia Stormwater Management Program (VSMP) regulation (9VAC25-870); and

- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9VAC25-880).

In addition, DEQ is responsible for the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to Municipal Separate Storm Sewer Systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program (9VAC25-890-40).

2(b) Requirements.

(i) Erosion and Sediment Control Plan. The Applicant is responsible for submitting a project-specific erosion and sediment control (ESC) plan to the locality in which the project is located for review and approval pursuant to the local ESC requirements, if the project involves a land-disturbing activity of 10,000 square feet or more. Depending on local requirements the area of land disturbance requiring an ESC plan may be less. The ESC plan must be approved by the locality prior to any land-disturbing activity at the project site. All regulated land-disturbing activities associated with the project, including on and off site access roads, staging areas, borrow areas, stockpiles, and soil intentionally transported from the project must be covered by the project specific ESC plan. Local ESC program requirements must be requested through the locality.

[Reference: *Virginia Erosion and Sediment Control Law* §62.1-44.15 et seq.; *Virginia Erosion and Sediment Control Regulations* 9VAC25-840-30 et seq.]

(ii) Stormwater Management Plan. Depending on local requirements, a Stormwater Management (SWM) plan may be required. Local SWM program requirements must be requested through the locality. [Reference: *Virginia Stormwater Management Act* §62.1-44.15 et seq.; *Virginia Stormwater Management (VSMP) Permit Regulations* 9VAC25-870-54 et seq.]

(iii) General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (VAR10). The operator or owner of a construction activity involving land disturbance of equal to or greater than 1 acre is required to register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Regulations. General information and registration forms for the General Permit are available at www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx.

3. Air Pollution Control. The EA states that construction and operation of the project could have an effect on local air quality (page 56). Localized short-term impacts during the construction are expected to result from operation of equipment, land disturbance, and increased construction traffic. Operation of the modified compressor stations and the new Stonewall M&R Station would result in increased emissions.

3(a) Agency Jurisdiction. The DEQ Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air Pollution Control Law (Virginia Code §10.1-1300 et seq.). DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

The Air Division regulates emissions of air pollutants from industries and facilities and implements programs designed to ensure that Virginia meets national air quality standards. The most common regulations associated with major projects are:

- Open burning: 9 VAC 5-130 *et seq.*
- Fugitive dust control: 9 VAC 5-50-60 *et seq.*
- Permits for fuel-burning equipment: 9 VAC 5-80-1100 *et seq.*

3(b) Agency Findings. According to the DEQ Air Division, the project site is located in a designated ozone nonattainment area and an emission control area for oxides of nitrogen (NO_x) and volatile organic compounds (VOCs).

3(c) Recommendation. Precautions should be taken to restrict the emissions of VOCs and NO_x during construction.

3(d) Requirements.

(i) Fugitive Dust

During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 *et seq.* of the *Regulations for the Control and Abatement of Air Pollution*. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;

- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

(ii) Open Burning

If project activities include the open burning of construction material or the use of special incineration devices, this activity must meet the requirements under 9 VAC 5-130 *et seq.* of the *Regulations* for open burning, and may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The applicant should contact County officials to determine what local requirements, if any, exist.

(iii) Fuel-Burning Equipment

Installation/ operation/ modification of fuel-burning equipment (boilers, generators, compressors, etc.) or any other air-pollution-emitting equipment may be subject to registration or permitting requirements (Article 6, Permits for New and Modified Sources).

3(e) Agency Recommendation. Coordinate with the DEQ NRO regarding applicable air permit requirements.

4. Solid and Hazardous Wastes and Hazardous Materials. The EA (page 8) states that all wastes (planned or unplanned) will be disposed of in accordance with applicable state and federal regulations.

4(a) Agency Jurisdiction. On behalf of the Virginia Waste Management Board, the DEQ Division of Land Protection and Revitalization is responsible for carrying out the mandates of the Virginia Waste Management Act (Virginia Code §10.1-1400 *et seq.*), as well as meeting Virginia's federal obligations under the Resource Conservation and Recovery Act and the Comprehensive Environmental Response Compensation Liability Act, commonly known as Superfund. The DEQ Division of Land Protection and Revitalization also administers those laws and regulations on behalf of the State Water Control Board governing Petroleum Storage Tanks (Virginia Code §62.1-44.34:8 *et seq.*), including Aboveground Storage Tanks (9VAC25-91 *et seq.*) and Underground Storage Tanks (9VAC25-580 *et seq.* and 9VAC25-580-370 *et seq.*), also known as 'Virginia Tank Regulations', and § 62.1-44.34:14 *et. seq.* which covers oil spills.

Virginia:

- Virginia Waste Management Act, Virginia Code § 10.1-1400 *et seq.*
- *Virginia Solid Waste Management Regulations*, 9 VAC 20-81
 - (9 VAC 20-81-620 applies to asbestos-containing materials)

- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60
 - (9 VAC 20-60-261 applies to lead-based paints)
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

Federal:

- Resource Conservation and Recovery Act (RCRA), 42 U.S. Code sections 6901 *et seq.*
- U.S. Department of Transportation *Rules for Transportation of Hazardous Materials*, 49 *Code of Federal Regulations*, Part 107
- Applicable rules contained in Title 40, *Code of Federal Regulations*.

4(b) Agency Findings. DEQ's Division of Land Protection and Revitalization (DLPR) staff conducted a cursory database search of solid and hazardous waste databases for waste sites in the project area, as well as a Geographic Information System search (500-foot radius) and did not identify any sites in close proximity to the project site/corridor which may impact the activity.

4(c) Recommendation. DEQ encourages all projects and facilities to implement pollution prevention principles, including:

- the reduction, reuse and recycling of all solid wastes generated; and
- the minimization and proper handling of generated hazardous wastes.

4(d) Waste Management Requirements.

(i) Contaminated Waste

Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations.

(ii) Asbestos-Containing Materials and Lead-Based Paint

All structures being demolished/renovated/removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to federal waste-related regulations, state regulations 9 VAC 20-80-620 for ACM and 9 VAC 20-60-261 for LBP must be followed.

5. Natural Heritage Resources. The EA states that short- and long-term impacts to wildlife habitat would occur from the construction and operation of the project. The impacts are expected to be minor due to the mobile nature of the majority of wildlife in the area and the availability of similar habitat adjacent to and near the site boundaries.

5(a) Agency Jurisdiction.

- (i) The Virginia Department of Conservation and Recreation's (DCR) Division of Natural Heritage (DNH). DNH's mission is conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act (Virginia Code §10.1-209 through 217), authorized DCR to maintain a statewide database for conservation planning and project review, protect land for the conservation of biodiversity, and the protect and ecologically manage the natural heritage resources of Virginia (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).
- (ii) The Virginia Department of Agriculture and Consumer Services (VDACS): The Endangered Plant and Insect Species Act of 1979 (Virginia Code Chapter 39 §3.1-1020 through 1030) authorizes VDACS to conserve, protect and manage endangered and threatened species of plants and insects. Under a Memorandum of Agreement established between VDACS and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species.

5(b) Agency Findings. DCR DNH searched its Biotics Data System (Biotics) for occurrences of natural heritage resources in the vicinity of the project area. The site-specific results are summarized below. See the attached DCR memorandum dated April 18, 2016 for greater detail.

Stonewall M&R Station:

Biotics documents the presence of natural heritage resources within two miles of the project area. Due to the scope of the activity and the distance to the resources, DCR does not expect adverse impacts on these resources to result from the project.

Leesburg Compressor Station:

The Little River Stream Conservation Unit (SCU) is located downstream from the project site. The Little River SCU has been given a biodiversity ranking of B2, which represents a site of very high significance. The natural heritage resources associated with this site are:

- *Lasmigona subviridis* (Green floater)
- Aquatic Natural Community (NP-Middle Potomac-Catoctin Third Order Stream)
- Aquatic Natural Community (NP-Middle Potomac-Catoctin First Order Stream)

Goose Creek and the Little River have been designated by DGIF as "Threatened and Endangered Species Waters" for the Green Floater.

Quantico Compressor Station:

Biotics documents the presence of natural heritage resources within two miles of the project area. Due to the scope of the activity and the distance to the resources, DCR does not expect adverse impacts on these resources to result from the project.

State-listed Plant and Insect Species:

The current activity will not affect any documented state-listed plants or insects.

State Natural Area Preserves:

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

5(c) Recommendations.

Leesburg Compressor Station: To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow.

General Recommendation: Contact DCR DNH to secure updated information on natural heritage resources if the scope of the project changes and/or six months has passed before it is utilized. New and updated information is continually added to the Biotics Data System.

5(d) Additional Information: DGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams and anadromous fish waters. The database may be accessed at <http://vafwis.org/fwis/>.

6. Transportation Impacts. The EA (page 52) states that short-term increases in local traffic at the project site are expected. These impacts would be minor and limited to the duration of construction activities.

6(a) Agency Jurisdiction. The Virginia Department of Transportation (VDOT) provides comments pertaining to potential impacts to existing and future transportation systems.

6(b) Agency Findings. The VDOT Northern Virginia District Office reviewed the EA and had no transportation-related comments. VDOT did point out that there are two bat species (little brown and tricolor) that were recently listed as state-endangered (effective April 1, 2016) and that impacts to these bats may require evaluation.

7. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects. Effective siting, planning and on-site best management practices will help to ensure that environmental impacts are minimized. Pollution

prevention techniques also include decisions related to construction materials, design and operational procedures that facilitate the reduction of wastes at the source. We have several recommendations regarding pollution prevention:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed project is committed to minimizing its environmental impacts, setting environmental goals and achieving improvements in its environmental performance. DEQ offers EMS development assistance and it recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. If interested, please contact DEQ (Meghann Quinn at 804-698-4021).

8. Pesticides and Herbicides. In general, when pesticides or herbicides must be used, their use should be strictly in accordance with manufacturers' recommendations. In addition, we recommend that Dominion use the least toxic pesticides or herbicides effective in controlling the target species to the extent feasible. For more information on pesticide or herbicide use, contact VDACS at (804) 786-3501.

9. Water Conservation. The following recommendations will result in reduced water use associated with the operation of the facility.

- Grounds should be landscaped with hardy native plant species to conserve water as well as lessen the need to use fertilizers and pesticides.
- Convert turf to low water-use landscaping such as drought resistant grass, plants, shrubs and trees.
- Improve irrigation practices by:
 - upgrading sprinkler clock; water at night, if possible, to reduce evapotranspiration (lawns need only 1 inch of water per week, and do not need to be watered daily; overwatering causes 85% of turf problems);
 - installing a rain shutoff device; and
 - collecting rainwater with a rain bucket or cistern system with drip lines.

REGULATORY AND COORDINATION NEEDS

1. Surface Waters and Wetlands. The project must comply with the Virginia Water Protection Program (Virginia Code § 62.1-44.15 *et seq.*). DEQ regulates impacts to waters and wetlands pursuant to 9VAC25-210 *et seq.* If the scope of the proposed activities change and there will be impacts to wetlands or surface waters, coordinate with the DEQ NRO regarding potential permitting requirements (NRO 703-583-3800).

If protocols change and the hydrostatic testing will result in a discharge, it must comply with the VAG83 general permit requirements. Coordinate with DEQ NRO with questions (NRO 703-583-3800).

2. Erosion and Sediment Control and Stormwater Management.

2(a) Erosion and Sediment Control and Stormwater Management. The Applicant is responsible for submitting a project-specific erosion and sediment control (ESC) plan to the locality in which the project is located for review and approval pursuant to the local ESC requirements. The ESC plan must be approved by the locality prior to any land-disturbing activity at the project site. Depending on local requirements, a Stormwater Management (SWM) plan may be required. Local SWM and ESC program requirements must be requested through Loudoun and Fauquier counties.

Contact the DEQ Office of Stormwater Management (Larry Gavan, 804-698-4040) for additional information.

2(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities (VAR10). For projects involving land-disturbing activities of equal to or greater than one acre the applicant is required to register for coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-870-1 *et seq.*).

Specific questions regarding the Stormwater Management Program requirements should be directed to DEQ, Holly Sepety at (804) 698-4039.

3. Air Quality Regulations. This project is subject to air regulations administered by the Department of Environmental Quality. The following sections of the Code of Virginia and Virginia Administrative Code (VAC) are applicable:

- fugitive dust and emissions control (9 VAC 5-50-60 *et seq.*);
- asphalt paving operations (9 VAC 5-45-760 *et seq.*); and
- open burning restrictions (9 VAC 5-130 *et seq.*).

Leidy South Project, 16-079F
EA

Coordinate with the DEQ NRO regarding potential permitting requirements for the new and modified compressor stations and M&R station (NRO 703-583-3800).

4. Solid and Hazardous Wastes. All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations.

For additional information concerning location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered, coordinate with the DEQ NRO (703-583-3800).

5. Natural Heritage Resources. Contact DCR DNH (Robbie Rhur 804-371-2594) with questions regarding DCR's site-specific recommendations.

Contact DCR DNH, Rene Hypes at (804) 371-2708, to secure updated information on natural heritage resources if the scope of the project changes and/or six months has passed before the project is implemented, since new and updated information is continually added to the Biotics Data System.

6. Wildlife Resources and Protected Species. Coordinate with DGIF (Amy Ewing, 804-367-2211) regarding potential impacts to the little brown and tricolor bat species that were identified by VDOT as recently listed by the state as endangered.

7. Historic and Archaeological Resources. If applicable, Dominion should coordinate the project with the responsible federal agency and DHR to ensure compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations at 36 CFR 800. Contact DHR (Roger Kirchen at 804-367-2323, extension 153 or Roger.Kirchen@dhr.virginia.gov) with questions.

Thank you for the opportunity to review and respond to the Environmental Assessment for the Leidy South Project. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4204 or Janine Howard at (804) 698-4299 for clarification of these comments.

Sincerely,



Bettina Sullivan, Program Manager
Environmental Impact Review

Leidy South Project, 16-079F
EA

Ec: Robbie Rhur, DCR
Amy Ewing, DGIF
Keith Tignor, VDACS
Roy Soto, VDH
Roger Kirchen, DHR
David Spears, DMME
Greg Evans, DOF
Tony Watkinson, VMRC
Jin Cromwell, VDOT
Chip Ray, VDOT
Elizabeth Jordan, VDOT
Martha Little, Virginia Outdoors Foundation
Scott K. York, Loudoun County
Paul McCulla, Fauquier County
Patrick Mauney, Rappahannock-Rapidan Regional Council
Mark G. Gibb, Northern Virginia Regional Commission
Nancy Fox-Fernandez, FERC

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Janine L. Howard

DEQ - OEIA PROJECT NUMBER: DEQ #16-079F

PROJECT TYPE: STATE EA / EIR FEDERAL EA / EIS SCC
 CONSISTENCY DETERMINATION

PROJECT TITLE: Leidy South Project, CP15-492-000

PROJECT SPONSOR: Federal Energy Regulatory Commission

PROJECT LOCATION: OZONE NONATTAINMENT
AND EMISSION CONTROL AREA FOR NOX & VOC

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: CONSTRUCTION
 OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. 9 VAC 5-45-760 et seq. – Asphalt Paving operations
3. **9 VAC 5-130 et seq. – Open Burning**
4. **9 VAC 5-50-60 et seq. Fugitive Dust Emissions**
5. 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____
6. 9 VAC 5-60-300 et seq. – Standards of Performance for Toxic Pollutants
7. 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
8. 9 VAC 5-80-1100 et seq. of the regulations – Permits for Stationary Sources
9. 9 VAC 5-80-1605 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
10. 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
11. 9 VAC 5-80-800 et seq. Of the regulations – State Operating Permits. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

All precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x). For any permitting needs, our Northern Virginia Regional Office may be consulted.



(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: April 7, 2016

Molly Joseph Ward
Secretary of Natural Resources

Clyde E. Cristman
Director



Rochelle Altholz
Deputy Director of
Administration and Finance

David C. Dowling
Deputy Director of
Soil and Water Conservation
and Dam Safety

Thomas L. Smith
Deputy Director of Operations

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

MEMORANDUM

DATE: April 18, 2016
TO: Janine Howard, DEQ
FROM: Roberta Rhur, Environmental Impact Review Coordinator
SUBJECT: DEQ 16-079F, Leidy South Project,

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Panda Stonewall Meter Station

Biotics documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Leesburg Compressor Station

According to the information currently in our files, the Little River Stream Conservation Unit (SCU) is located downstream from the project site. SCUs identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Little River SCU has been given a biodiversity ranking of B2, which represents a site of very high significance. The natural heritage resources associated with this site are:

<i>Lasmigona subviridis</i>	Green floater	G3/S2/NL/LT
Aquatic Natural Community (NP-Middle Potomac-Catoctin Third Order Stream)		G2/S2/NL/NL
Aquatic Natural Community (NP-Middle Potomac-Catoctin First Order Stream)		G3G4/S3S4/NL/NL

The Green floater, a rare freshwater mussel, ranges from New York to North Carolina in the Atlantic Slope drainages, as well as the New and Kanawha River systems in Virginia and West Virginia (NatureServe, 2009). In Virginia, there are records from the New, Roanoke, Chowan, James, York, Rappahannock, and Potomac River drainages. Throughout its range, the Green floater appears to prefer the pools and eddies

with gravel and sand bottoms of smaller rivers and creeks, smaller channels of large rivers (Ortman, 1919) or small to medium-sized streams (Riddick, 1973). Please note that this species has been listed as state threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

The documented Aquatic Natural Communities are based on Virginia Commonwealth University's **INSTAR** (*Interactive Stream Assessment Resource*) database which includes over 2,000 aquatic (stream and river) collections statewide for fish and macroinvertebrate. These data represent fish and macroinvertebrate assemblages, instream habitat, and stream health assessments. The associated Aquatic Natural Community is significant on multiple levels. First, one stream is a grade A- and the other stream is a grade B, per the VCU-Center for Environmental Sciences (CES), indicating its relative regional significance, considering its aquatic community composition and the present-day conditions of other streams in the region. The first stream reach also holds an "Exceptional" stream designation and the second stream reach holds a "Healthy" stream designation per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, these streams contribute to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present.

Threats to the significant Aquatic Natural Communities and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

In addition, Goose Creek and Little River have been designated by the VDGIF as "Threatened and Endangered Species Waters" for the Green floater.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow. Due to the legal status of the Green floater, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 - 570).

Quantico Compressor Station

Biotics documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The VDGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov. According to the information currently in our files, Goose Creek, which has been designated by the VDGIF as a "Threatened and Endangered Species Water" for the Green floater is within 2 miles of the project area. Furthermore, this project is located within 2 miles of a documented occurrence of a state listed animal. Therefore, DCR recommends coordination with VDGIF, Virginia's regulatory authority for the management and protection of these species to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

CC: Ernie Aschenbach, VDGIF

Literature Cited

NatureServe. 2009. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <http://www.natureserve.org/explorer>. (Accessed: April 27, 2010).

Ortman, A.E. 1919. A monograph of the naiades of Pennsylvania, Part 3: Systematic account of the genera and species. Mem. Carnegie Mus. 8:1-384.

Riddick, M.B. 1973. Freshwater mussels of the Pamunkey River system, Virginia. M.S. Thesis, Virginia Commonwealth University, Richmond, VA 105pp.

Williams, J.D., M.L. Warren, Jr., K.S. Cummings, J.L. Harris, and R.J. Neves. 1993. Conservation status of freshwater mussels of the United States and Canada. Fisheries 18: 6-9.



MEMORANDUM

TO: Janine Howard, DEQ/EIR Environmental Program Planner

FROM: Katy Dacey, DLPR Review Coordinator

DATE: April 12, 2016

COPIES: Sanjay Thirunagari, DLP&R Review Manager
EIR File

SUBJECT: EIR Proj. No 16-079F- Leidy South Project CP-15-492-000, Loudoun & Fauquier Counties in VA – Review Comments

The Division of Land Protection & Revitalization has completed its review of the Environmental Impact Report regarding the Leidy South Project for the three proposed sites in VA.

The project scope: Natural gas pipeline facilities are proposed to be constructed and operated in Pennsylvania, Maryland and Virginia. The three natural gas facilities referenced in Virginia to install additional compression and filter/separators at the Quantico and Leesburg Compressor Stations and to construct a M & R Station in Loudon County.

We have provided comments below concerning potential waste issues and environmental resources that could be affected and which may be impacted by this proposed project. The submittal addressed potential solid and/or hazardous waste issues. The submittal indicated a search of waste-related databases. The DLPR staff has conducted a cursory review of its database files, including a GIS database search (500 foot radius) of along all three the project sites and determined the information below.

The staff's summary comments are as follows:

Hazardous Waste Facilities –none in close proximity to either of the three project sites

CERCLA Sites – none in close proximity to either of the three project sites

The following websites may prove helpful in locating additional information for these identification numbers: <http://www.epa.gov/superfund/sites/cursites/index.htm> or http://www.epa.gov/enviro/html/rcris/rcris_query_java.html.

FUDs Sites – none in close proximity to either of the three project sites

Solid Waste Facilities – none in close proximity to either of the three project sites

VRP Sites - none in close proximity to either of the three project sites

Petroleum Release Sites – none in close proximity to either of the three project sites

(Note: Dates above are the latest PC Database edit dates of the specific petroleum contamination (PC) Case Nos.)

Please note that the DEQ's PC case files of the PC Case Nos., within 100 feet of the proposed project are identified above and these petroleum releases should be evaluated by the project engineer or manager to establish the exact location of the release and the nature and extent of the petroleum release and the potential to impact the proposed project. The facility representative should contact the DEQ's Northern Virginia Regional Office (703-583-3800) Tanks Program for further information and the administrative records of the PC cases which are in close proximity to the proposed project.

GENERAL COMMENTS

Soil, Sediment, and Waste Management

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Part 107.

Asbestos and/or Lead-based Paint

All structures being demolished/renovated/ removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions may be directed to Ms. Kathryn Perszyk at the Northern Virginia Regional Office (703-583-3856).

Pollution Prevention – Reuse - Recycling

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Katy Dacey, Environmental Specialist, at (804) 698-4274.

Howard, Janine (DEQ)

From: Burstein, Daniel (DEQ)
Sent: Tuesday, April 12, 2016 2:50 PM
To: Howard, Janine (DEQ)
Subject: Re: FERC - Leidy South Project, CP15-492-000, DEQ #16-079F - Review

NRO comments regarding the Environmental Assessment for the FERC: Leidy South Project, CP15-492-000, located in Fauquier and Loudoun Counties, Virginia are as follows:

Land Protection Division – The project manager is reminded that if any solid or hazardous waste is generated/encountered during construction, FERC would follow applicable federal, state, and county regulations for their disposal.

Air Compliance/Permitting - The project manager is reminded that during the construction phases that occur with this project; the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120. In addition, should any open burning or use of special incineration devices be employed in the disposal of land clearing debris during demolition and construction, the operation would be subject to the Open Burning Regulation 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100.

Virginia Water Protection Permit (VWPP) Program – The project manager is reminded that a VWP permit from DEQ may be required should impacts to surface waters be necessary. DEQ VWP staff recommends that the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the US Army Corps of Engineers. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance.

Water Permitting/VPDES Program/Stormwater: The project manager is reminded to follow all applicable regulations related to stormwater management and erosion and sediment controls.

Daniel Burstein
Regional Enforcement Specialist, Senior II
Virginia Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193
Phone: (703) 583-3904
daniel.burstein@deq.virginia.gov



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive
Fairfax, VIRGINIA 22030

CHARLES A. KILPATRICK
COMMISSIONER

April 19, 2016

Ms. Janine Howard

Virginia Department Environmental Quality

629 East Main Street

Richmond, VA 23219

RE: Leidy South Project Environmental Assessment - 16-079F

Dear Ms. Howard:

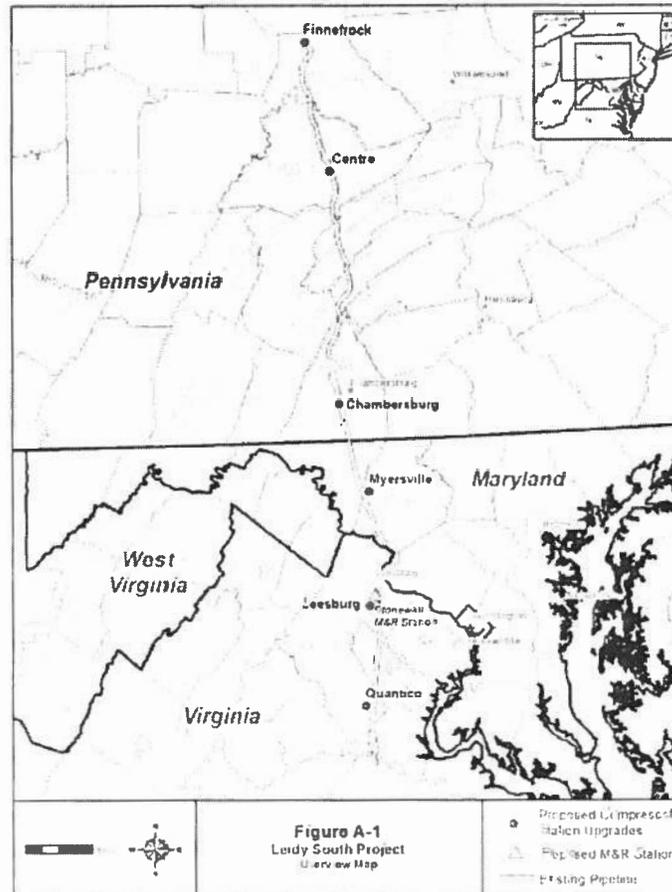
Thank you for referring the above cited project to the Virginia Department of Transportation (VDOT) for review and comment. Based on our review, we have the following comment to offer.

- Two bat species, little brown and tricolor, were recently listed as state endangered as of April 1, 2016 and FERC staff may want to consider whether this recent information should be addressed in their EA; the Virginia Department of Game and Inland Fisheries would be the lead state agency for any coordination.

BACKGROUND-The Federal Energy Regulatory Commission (FERC or Commission) has prepared an environmental assessment (EA) for the Leidy South Project proposed by Dominion Transmission, Inc. (DTI). DTI requests authorization to construct, install, own, operate, and maintain certain facilities located in Clinton, Franklin, and Centre counties, Pennsylvania; Frederick County, Maryland; and Loudoun and Fauquier counties, Virginia, to provide 0.155 billion cubic feet (BCF) per day of natural gas and firm transportation services in the Mid-Atlantic region to improve regional energy security, and to help meet the increasing demand for natural gas to fuel existing and new power generation facilities. Construction is anticipated to commence during the summer of 2016 and is expected to last for approximately 17 months. DTI intends to place Project facilities in-service by October 1, 2017.

Construction of DTI's Leidy South Project would temporarily impact 151.6 acres of land during construction, and of this, 39.2 acres would be permanently affected by operation of the proposed facilities. The construction of the facility at the Leesburg (Stonewall) will impact 20 acres of land while its operation impacts 8.2 acres of land.

The following figure shows the overview map for the proposed construction.



Should you have any question about this memorandum, please feel free to contact us directly.

Sincerely,

Cina S. Dabestani

Sr. Transportation Engineer

Cina.Dabestani@VDOT.Virginia.GOV

703 . 259 . 2991

Cc:

Maria Sinner, Prog Admin Manager III, VDOT NoVa / Norman Withaker, Prog Admin Manager III, VDOT NoVa

Andrew Beacher, Prog Admin Specialist III, VDOT NoVa / Jim Cromwell, Prog Admin Specialist III, Central Office

Alfred C. Ray, Environmental Specialist II, Central Office / Antonios R. Estefanous, Prog Admin Manager III, VDOT NoVa

Elizabeth Jordan, Environmental Program Planner, Richmond, Va

Howard, Janine (DEQ)

From: Howard, Janine (DEQ)
Sent: Wednesday, April 20, 2016 4:07 PM
To: Ewing, Amy (DGIF)
Subject: RE: NEW PROJECT FERC Leidy South 16-079F
Attachments: VDOT.pdf

Hi Amy,

I know you are probably working on a response for this project and I do apologize that this is the second reminder you have received, however I wanted to share with you the attached comments that I received from VDOT on this project. VDOT mentioned the tricolor and little brown bat species that were apparently listed as state-endangered by DGIF effective April 1, 2016.

If you have any comments regarding those species please let me know ASAP.

Thank you,

Janine L. Howard

Environmental Impact Review Coordinator

Office of Environmental Impact Review
Division of Environmental Enhancement
Virginia Department of Environmental Quality
629 E. Main Street
Richmond, VA 23219

t: (804) 698-4299

f: (804) 698-4032

For program updates and public notices please subscribe to the [OEIR News Feed](#)

From: Fulcher, Valerie (DEQ)
Sent: Tuesday, April 05, 2016 9:51 AM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Dacey, Katy (DEQ); Narasimhan, Kotur (DEQ); Gavan, Larry (DEQ); Sepety, Holly (DEQ); Burstein, Daniel (DEQ); Kirchen, Roger (DHR); Spears, David (DMME); Evans, Gregory (DOF); Ray, Alfred C. (VDOT); Cromwell, James R. (VDOT); Jordan, Elizabeth (VDOT); gmg@novaregion.org; Mauney, patrick l; coadmin@loudoun.gov; david.ek@fauquiercounty.gov; ImpactReview (VOF)
Cc: Howard, Janine (DEQ)
Subject: NEW PROJECT FERC Leidy South 16-079F

Good morning - this is a new OEIR review request/project:

Document Type: Environmental Assessment
Project Sponsor: Federal Energy Regulatory Commission
Project Title: Leidy South Project, CP15-492-000
Location: Loudoun County, Fauquier County
Project Number: DEQ #16-079F

Howard, Janine (DEQ)

From: Gavan, Larry (DEQ)
Sent: Thursday, April 21, 2016 10:43 AM
To: Howard, Janine (DEQ)
Cc: Zegler, Hannah (DEQ)
Subject: RE: NEW PROJECT FERC Leidy South 16-079F Williams/Trancso

I am OK w/it.
Thx Janine.
Regards
L

From: Howard, Janine (DEQ)
Sent: Thursday, April 21, 2016 10:40 AM
To: Gavan, Larry (DEQ)
Subject: RE: NEW PROJECT FERC Leidy South 16-079F Williams/Trancso

Larry,

Thanks for stopping by to speak with me about the stormwater language for this project. Below I have pasted the language that I am currently using. Please confirm that it is correct. This project involves installation of new equipment at existing compressor stations and the construction of a new metering and regulation station in Virginia, but no new pipeline construction. Additionally, the project is not located in Virginia's Coastal Zone.

(i) Erosion and Sediment Control Plan. The Applicant is responsible for submitting a project-specific erosion and sediment control (ESC) plan to the locality in which the project is located for review and approval pursuant to the local ESC requirements, if the project involves a land-disturbing activity of 10,000 square feet or more. Depending on local requirements the area of land disturbance requiring an ESC plan may be less. The ESC plan must be approved by the locality prior to any land-disturbing activity at the project site. All regulated land-disturbing activities associated with the project, including on and off site access roads, staging areas, borrow areas, stockpiles, and soil intentionally transported from the project must be covered by the project specific ESC plan. Local ESC program requirements must be requested through the locality. [Reference: *Virginia Erosion and Sediment Control Law* §62.1-44.15 et seq.; *Virginia Erosion and Sediment Control Regulations* 9VAC25-840-30 et seq.]

(ii) Stormwater Management Plan. Depending on local requirements, a Stormwater Management (SWM) plan may be required. Local SWM program requirements must be requested through the locality. [Reference: *Virginia Stormwater Management Act* §62.1-44.15 et seq.; *Virginia Stormwater Management (VSMP) Permit Regulations* 9VAC25-870-54 et seq.]

(iii) General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (VAR10). The operator or owner of a construction activity involving land disturbance of equal to or greater than 1 acre is required to register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Regulations. General information and registration forms for the General Permit are available at www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPPermits/ConstructionGeneralPermit.asp.

Thanks for your help!

Howard, Janine (DEQ)

From: Frasier, Douglas (DEQ)
Sent: Wednesday, April 20, 2016 1:11 PM
To: Howard, Janine (DEQ)
Cc: Burstein, Daniel (DEQ); Thomas, Bryant (DEQ)
Subject: RE: Re: FERC - Leidy South Project, CP15-492-000, DEQ #16-079F - Review

Janine,

Per your request, I've reviewed the proposed hydrostatic test protocol for the above project. Hydrostatic tests are eligible for coverage under the referenced General Permit; however, the proposal is to tank and transport all hydrostatic test waters off site for disposal. Subsequently, no discharge will occur and permit coverage is not warranted in this instance.

Should test protocols change and it is decided that a discharge is necessary; the facility should contact me for details concerning permit coverage.

If you have any questions, please do not hesitate.

Best regards,

Douglas Frasier

VPDES / VPA Permit Writer, Senior II
Certified Nutrient Management Planner - Ag / Turf
Regional Toxics Management Program Coordinator
Department of Environmental Quality
Northern Regional Office
13901 Crown Court, Woodbridge, VA 22193
Phone: 703-583-3873
Douglas.Frasier@deq.virginia.gov

From: Howard, Janine (DEQ)
Sent: Wednesday, April 20, 2016 11:18 AM
To: Burstein, Daniel (DEQ)
Cc: Westernik, Anna (DEQ)
Subject: RE: Re: FERC - Leidy South Project, CP15-492-000, DEQ #16-079F - Review

Hi Daniel,

This project involves hydrostatic testing at the Leesburg Compressor Station and the Stonewall M&R Station (see page 23 in the EA). Would you please confirm with the VPDES group that the General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests (VAG83) would apply for this project?

The document is available at www.deq.virginia.gov/filesshare/oeir in the [FERC](#) folder.

Anna, I'm copying you since I see Daniel is out for quite a while. If you would send on to the appropriate person I'd appreciate it!

Thanks,