

Anita Riggleman
VA Department of Environmental Quality
Valley Regional Office,
P.O. Box 3000
Harrisonburg, VA 22801

RE: Prevention of Significant Deterioration (PSD) Permit issued by DEQ, under the authority of the Air Pollution Control Board, for the Warren County Power Station, Virginia Electric and Power Company; 81391

Dear Ms. Riggleman:

Please accept these comments on behalf of the Piedmont Environmental Council (PEC) on the PSD application by VA Electric Power Company for a 1280 MW power plant in Warren County Virginia. These comments are in addition to those given orally at the November 9th hearing by Chris Miller, President of PEC.

Since 1972, the Piedmont Environmental Council has promoted and protected the northern Piedmont's rural economy, natural and historic resources, and beauty. We were heavily involved in this proposal since its inception by Competitive Power Ventures. Our continued interest in this permit is due to the location (proximity to the Shenandoah National Park and nonattainment areas) and the impacts associated with the proposed increase in size. Those impacts include, but are not limited to, those on air and water quality, sensitive resources contained within the Shenandoah National Park, and scenic and historic resources in the surrounding community.

For the reasons below, PEC is recommending denial of the permit as drafted and requesting the State Air Pollution Control Board (SAPCB) directly consider and take final action on Dominion Virginia Power's proposed Warren County Power Station. Approval of the permit should only be granted if Dominion satisfies the complaints listed below.

Shenandoah National Park

Testimony given at the public hearing by Superintendent Martha Bogle of the National Park Service indicates the likelihood of unacceptable impacts to Shenandoah National Park resources. As a class I area defined under the Clean Air Act, protection of the Shenandoah National Park deserves the greatest level of consideration in determining the adequacy of the permit before VA Department of Environmental Quality (VDEQ) and the SAPCB. It is our formal position that no permit should be issued for this facility if it fails to satisfy the following concerns raised by the Park Service:

1. Visibility – analysis of the modeling data for the plume from this facility demonstrated an adverse impact, categorized as infrequent, but potentially severe.
2. Acid Deposition – Modeling of the proposed facility demonstrated nitrogen acid deposition impacts to already impaired streams, as defined by VDEQ, in the northern watersheds and within the Park Boundary.

3. Offsets - Currently the draft permit contains enforceable offsets at a 1.15 to 1 ratio. From the testimony given by Ms. Bogle, a higher level of offset, closer to the affected resource, is needed in order to protect Park resources. If that higher level is deemed necessary by the Park Service, VDEQ should change the condition to reflect the appropriate nitrogen oxide (NOx) offset. It is also imperative that these additional offset requirements are contained within the permit so as to remain enforceable by the VDEQ.

Nonattainment Areas and Air Quality

At this time we are unaware of potential impacts to existing nonattainment areas and those that are a part of any Early Action Compact (Winchester and Frederick County). But due to the proximity of these impaired airsheds and that of the Shenandoah National Park, VDEQ and the SAPCB must ensure no further decline in air quality and protect against the associated public health and environmental impacts that would occur.

Dominion Claims That New Generation Will Reduce “Import” of Electricity

In its testimony November 9th, Dominion referred to Virginia’s status as “the second largest importer of electricity after California.” This claim suggests that Virginia should be energy independent or self-sufficient. Presumably, any impacts from an expanded generation facility in Warren County are necessary to reduce “imports.” DEQ and the SAPCB should reject that assertion for the following reasons:

1. VA Code section 56-265.2 demonstrates this is not an issue before the Department and should hold no sway over the agency or the State Air Pollution Control Board, regardless of the final decision-maker.
2. The reason that Virginia “imports” large quantities of electricity is by design. Dominion Resources, then known as Virginia Electric Power Company, built the Mt. Storm power facility in West Virginia, presumably to avoid more stringent air quality regulation. For most of its operating life, the generation plant at Mt. Storm has provided a large portion of the electricity to serve Dominion’s Virginia customers. Most of the remaining “imports” of electricity are from American Electric Power facilities in West Virginia serving retail customers in Virginia. Dominion Resources and its subsidiary, Virginia Electric Power Company, buy and sell electricity within PJM, the regional transmission operating authority. If Dominion Resources or VEPCO import from generators outside of Virginia, it is by design, not necessity.

Viewshed

VDEQ and the SAPCB must ensure that other state and federal agencies tasked with the protection of scenic and historic resources have been made fully aware that this increase in generation will require two additional stacks at 175' tall and additional associated structures (boiler stack, condenser, etc.) in excess of 100' tall.

From the Warren County Conditional Use Permit 2001-10-01

The production facility will consist of up to three 3 stacks with a maximum height of 175 feet and various associated structures With the exceptions of onsite electric transmission facilities up to a maximum height of 160 feet the auxiliary boiler stack with a maximum height of 155 feet the air cooled condenser with a maximum height of 145 feet and the heat recovery steam generator with

a maximum height of 120 feet all other structures associated with the facility shall not exceed 100 feet in height

VDEQ should solicit comments from other affected agencies (VA Department of Historic Resources, VA Outdoors Foundation, National Park Service, etc) to ensure the additional stacks and associated structures will not significantly impair existing resources such as properties listed on the National Register and Register eligible properties, conservation easements and scenic overlooks from the Shenandoah National Park. In addition to the areas in Front Royal and the Shenandoah National Park, there are areas in Warren County with properties eligible for the National Register. Please see the attached map – *Dominion_viewshed*. We are aware that a lowering of stack height may result in associated public health impacts. But these additional stacks and their height were deemed necessary by the applicant in order to increase the size of the proposed plant. This further demonstrates the difficulty of placing a large power generation facility in such a sensitive area. There should be a careful balancing of the benefits provided by this proposed expansion against the adverse environmental impacts and those to sensitive scenic and historic sites that could accrue.

SAPCB Involvement

The SAPCB should be responsible for any decision on this permit. This is a reasonable request due to 1) the proximity to the Shenandoah National Park and concern for Park resources 2) Current and past interest in this location for a fossil fuel facility given proximity to nonattainment areas 3) they, as the appropriate Citizen Board, made the original decision for the CPV permit at this same location.

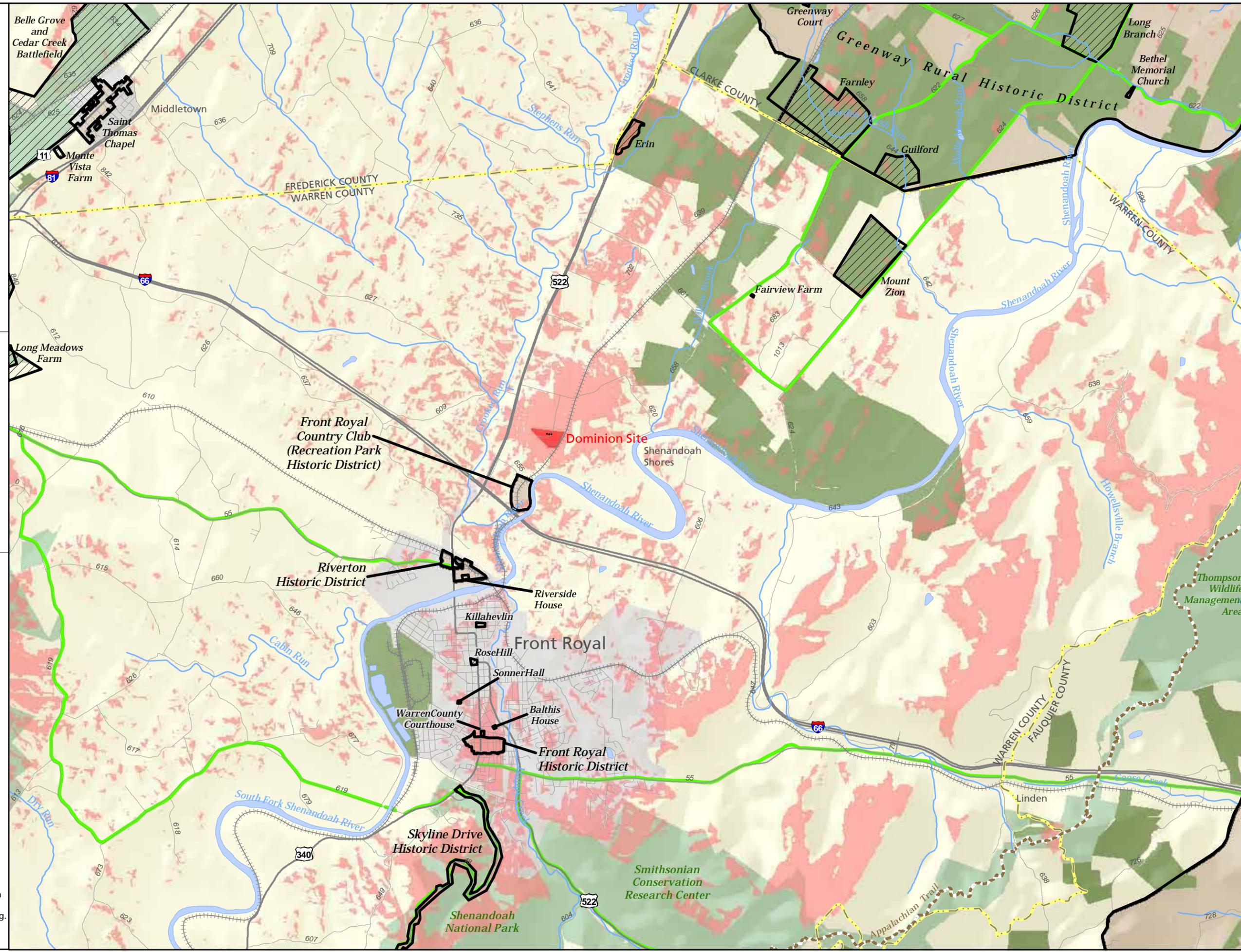
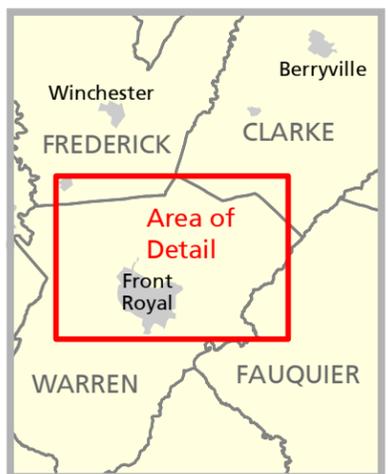
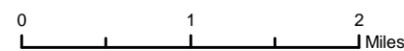
Sincerely,

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Visibility of Proposed Dominion Power Plant Warren County



- Smokestacks Visible
- Dominion Power Plant Site
- Conservation Easements
- Publicly Owned Lands
- National Register Historic Districts
- National Register Historic Sites
- State Scenic Byways
- Appalachian Trail



Map created by PEC for presentation purposes only. Data source: Virginia Department of Historic Resources, Clarke and Warren Counties, viewshed is theoretical and based on USGS 10 meter DEM with forest height of 60 feet and smoke stack height of 175 feet. Although efforts have been made to verify data, accuracy is not guaranteed. For more information, please visit pecva.org. August 11, 2010 | WARRENTON | jwr V:\...Warren\projects\CPV_powerplant