



DEQ VALLEY

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To: _____
Date: _____

November 23, 2010

Anita Riggleman
Valley Regional Office
VA Department of Environmental Quality
P.O. Box 3000
4411 Early Road
Harrisonburg, VA 22801

Dear Ms. Riggleman,

The Friends of the Shenandoah River appreciate the opportunity to comment on the draft permit from the Department of Environmental Quality to limit air pollution from the proposed natural gas power plant proposed in Warren County, Virginia. It is our understanding that Dominion Resources has applied for a permit to construct this power generation facility. The proposed plant is scheduled to produce approximately 1,280 megawatts. This makes it a much larger plant than the one that was previously permitted on the same site.

We have serious concerns about this application. Our primary concern is the addition of a major source of new air pollution in our area. It's not only the reduction in air quality that worries us, but also the increased acidity of our streams. We are also concerned about the impact of the plant emissions on Shenandoah National Park. As you know, the Clean Air Act sets the air quality standards for the nation. These standards are enforced by the Environmental Protection Agency and the strictest restrictions on emissions are in Class I areas. Shenandoah National Park is a designated Class I area. The Park and Skyline Drive represent significant tourist attractions for our area bringing not only tens of thousands of visitors each year but also ten of thousands in spending dollars as well.

If this power plant is approved, it will be one of the largest electric power plants ever permitted in Virginia. According to previous testimony, The National Park Service is opposed to the project unless certain reductions in emissions are made to the proposed facility. We here in the Shenandoah Valley are not opposed to new power plants and we recognize their need. However, the design as submitted seems too large considering its proximity to the Park. If the size of the plant were reduced, the emissions would also be reduced, and we feel that some of the impacts would be more manageable.

As an organization concerned with improving water quality in our region, we have real concerns about the Draft Permit and the statements it makes about Particulate Matter. It seems like the Draft Permit is linking both Coarse Particulate Matter and Fine Particulate Matter together. In the draft, PM-10 (Coarse Particulate Matter) and PM-2.5 (Fine

Particulate Matter) have the same limit, 211.5 tons a year. We just want to make sure that both types of particulate matter are being directly controlled and accounted for. EPA (the US Environmental Protection agency) regulations clearly state that because PM 2.5 presents serious air quality and public health concerns, both types of particulate matter need direct control. The permit needs to address this.

We hope that DEQ staff will request a review and public hearing at the State Air Pollution Board Level because of the significant impact to the air quality in the northern Shenandoah Valley and the National Park. We also feel that since the plant is so near Shenandoah National Park, it is necessary that the standards for emissions and their controls be at the (LAER) level. (the lowest Achievable Emissions Rate)

Because of the plant's proximity to the Park, The Friends of the Shenandoah would like to see the applicant held to a higher standard of offsets. If the offset ratio were changed from 1.15 to 1, to at least 2 to 1 for sources close to the park, it would help the area mitigate some of the impact. If the applicant, Dominion Resources, cannot find offsets close to the Park, we would like the ratio raised to 3 to 1. We realize these are serious requests and we do not make them lightly; but one must also realize the significant impact this plant will have on the already poor air quality of our region. As said before, Shenandoah National Park is a huge local tourist attraction for the local economy. We, here in the Shenandoah Valley, are also very concerned about our own "natural environment" and we would hate to see it threatened in any way.

We thank you and the State Department of Environmental Quality for the opportunity to submit our comments concerning this application.

Sincerely yours,



George L. Ohrstrom, II
President, The Friends of the Shenandoah River