

May 14, 2006

Dear Air Board Members:

Thank you for your rigorous review of Dominion Power's proposal to build a coal-fired power plant in Wise County. I strongly believe that the permits for the proposed Dominion Virginia City Hybrid Energy Center should be in the hands of expert air scientists like those we have on the State Air Pollution Control Board.

I am a native of Wise County. I write to you as a citizen who is invested in the health and safety of both the Appalachian region as well as northern Virginia. The proposal would have significant air quality impacts both locally and across the state. I find the proposal for the plant to be incomplete and hazardous to both Wise County residents and the entire Commonwealth of Virginia. I request that the following steps be taken before offering air permits for Dominion's proposed plant:

- Determine whether or not Dominion will sequester greenhouse gas emissions upon opening of the plant and how such carbon sequestration would occur.
- Place a limitation on the amount of waste coal, which contains high levels of mercury, burned in the plant.
- Determine whether Dominion will commit to using only waste coal collected from within Virginia.
- Study the impacts of the power plant on air quality outside of the required 186 mile range, including on all federally-designated ozone non-attainment areas in the state.
- Require Dominion to use the **best available technology** for emissions control, for all federally regulated pollutants, including CO₂.
- Require that Dominion demonstrate that no alternatives, including renewable energy and conservation, are more cost effective than building this plant, taking into account both health costs associated with mercury, particulate, sulfur dioxide, and nitrogen oxide pollution, and costs associated with ozone reduction measures necessary to keep areas such as Northern Virginia, metro Richmond, and Hampton Roads from violating federal ozone regulations.

The draft permit has limitations for several air pollutants, including particulate matter and sulfur dioxide; however, there is no plan to implement carbon dioxide emission controls in the near future. In fact, there is no technically feasible method to sequester carbon as Dominion has suggested it might, making Dominion's claim that this plant is carbon capture "compatible" misleading at best. Allowing greater quantities of sulfur dioxide, nitrous oxides, and particulate matter, even within the allowable range, will worsen acid rain, smog, and respiratory problems in Virginia. Dominion promises to use carbon sequestration at some point, but the company has failed to guarantee design compatibility with the plant. The only indication of dedication to this promise is a piece of land set aside for potential sequestration. Any new coal plants in Virginia should be required to sequester carbon emissions upon beginning of operation. Climate change is a threat to biodiversity, our economy, our homes, and our drinking water supply. Areas including Northern Virginia, the Northern Neck, Eastern Shore, and Hampton Roads are directly threatened by rising sea levels.

The proposal includes burning “waste coal,”¹ which releases more mercury and particulate pollution than regular coal, leading to higher rates of birth defects and respiratory problems in Virginia². Not only does Dominion Power propose to burn waste coal from Virginia mines, Dominion refuses to commit to only utilizing Virginia coal. This means that Dominion’s proposal could make Virginia an importer of waste coal, thus making Virginia a *net mercury importer*. The concentration of waste coal burning near the Clinch River imperils residents of Wise, Russell, Washington, and Wythe counties, as well as the cities of St. Paul, Abingdon, and Bristol. Furthermore, the concentrated mercury deposition in this part of Southwest Virginia will imperil the dozens of endangered mussel and fish species that reside in the Clinch. Several of these species are endemic to the Clinch (populations of mussels at Pendleton Island and Kyle’s Ford), meaning that this plant may wipe out entire species found nowhere else on earth.

While DEQ has not studied the impacts of the plant on regions outside of the 186 mile distance, a study done by NASA DEVELOP and Northwest Missouri State University Air estimates that pollutants from the Wise County plant would reach Northern Virginia, Shenandoah National Park, the Great Smokies National Park, and Northern Virginia within 72 hours of emission³. Increasing air pollutants could worsen the metropolitan DC area’s status as a non-attainment area for Particulate Matter (PM-2.5) and 8-Hour Ozone⁴. Before any air permits are approved, I ask that the DEQ assess the statewide impacts of potential emissions from the Wise County plant, including the costs that the metropolitan areas of Northern Virginia, Richmond, and Hampton Roads will incur to reduce ozone pollution originating at the proposed Virginia City Hybrid Energy Center.

Before recommending air permits for this proposal, please require Dominion to compare the costs and benefits of investing in renewable energy and conservation measures with this proposal. Citizens should not have their electricity rates raised to support building a plant that will cause our air quality and health to deteriorate. According to federal health data, power plants already contribute to 1,000 premature deaths, 1,400 heart attacks, and 24,00 asthma attacks in Virginia annually⁵. Virginia is ranked 8th in the country for deaths and health impacts from power plants⁶. We must find cleaner ways to provide energy, because we are already paying for pollution from coal-burning plants through health problems and medical bills. Please demand that Dominion Power thoroughly investigate every alternative to building this plant before knowingly damaging Virginians’ health.

Thank you for your consideration. Please note that citizens in southwestern Virginia who speak out regarding the risks of the proposed plant are being intimidated and threatened by various

¹ Dominion Power. “Wise County Site Chosen for Final Evaluation of Future Clean Coal Power Station in Virginia.” 11 May 2006. <<http://www.dom.com/news/elec2006/pr0511.jsp>>.

² EPA. “Mercury and Utilities: Current Control Technologies.” 31 July 2001.

³ “Combining Remote Sensing with Ground Monitor Data to Predict Short-Term Atmospheric Distribution of Fine Particulate Matter in Southwest Virginia.” Amanda Smith and Aaron Johnson. 2007. Collaborative Study Between Northwestern Missouri State University and the NASA DEVELOP Program of Wise County.

⁴ Environmental Protection Agency. “The Green Book Nonattainment Areas for Criteria Pollutants.” 21 December 2007. <<http://www.epa.gov/air/oaqps/greenbk/>>.

⁵ Clean Air Task Force. “Dirty Air, Dirty Power.” June 2004. <<http://www.catf.us/publications/view/24>>.

⁶ ---. “Dirty Air, Dirty Power.” June 2004. <<http://www.catf.us/publications/view/24>>.

groups; thus, citizens who speak out locally are taking on personal risk in order to create a healthier future for posterity.

The corruption of the General Assembly makes your task all the more important. With politicians ranging from Phil Puckett to Dick Saslaw bought by Dominion's campaign contributions, average citizens rely on those last vestiges of a Commonwealth, our citizen boards, to protect them from the craven plans of a utility that demonstrates appalling disregard for the welfare of the populace it is supposed to serve.

Sincerely,

Amanda D. Smith
P.O. Box 1751
Coeburn, VA 24230
276-219-4611