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State Air Pollution Control Board
Richard D. Langford, Chair
Vivian E. Thomson, Vice Chair
Hullihen Williams Moore
Bruce C. Buckheit
John N. Hanson

Dear Members of the State Air Pollution Control Board:

The Upper Tennessee River Roundtable (UTRR) is a regional watershed group whose mission is to achieve clean water throughout the watershed with the involvement of citizens in planning, education, coordination, attracting funding, and serving as an advocate for our water resources. The Clinch River is a part of the Upper Tennessee River watershed and has unique ecological values that should be protected. These include recreational, scientific, natural and public health values. The Clinch River is ranked by the Nature Conservancy as one of the nation's most ecologically significant freshwater systems. The Clinch and Powell River system supports 52 species of native freshwater mussels and 128 native fish species; including eighteen federally listed mussels and two federally listed fish¹.

The Upper Tennessee River Roundtable Board of Directors has several concerns regarding the proposed Virginia City Hybrid Energy Center.

Mercury - Dominion seeks a permit to emit up to 49 pounds of mercury into the atmosphere. Mercury has been proven to impact aquatic life in local streams and watersheds. The Guest River (tributary to the Clinch) is already under a fish consumption ban due to the high levels of mercury, PCB's and arsenic. Does DEQ have a plan to monitor the deposition of mercury into the Clinch and Holston rivers from nearby point sources?

Sulfuric Acid - DEQ's permit would allow Dominion to emit 34 tons of sulfur dioxide. This is the leading cause of acid rain and fog which are known to damage forests and waterways. Local streams are already at risk of acid damage due to mining activity. Studies have found that sulfuric acid deposition is a significant threat to Appalachian streams². Has DEQ estimated the potential risk to nearby forests and streams from acid precipitation associated with this plant?

Nitrogen oxides - The DEQ permit would allow the plant to emit 1,968 tons of nitrogen oxides per year. Current deposition of nitrogen oxides already causes major environmental impacts on Virginia waterways, including the Chesapeake Bay. Does DEQ have any data to indicate whether the permitted NOx emissions will have any effects on nutrient pollution problems downwind of the plant?

Accidents - An accidental spill could cause irreparable damage to the aquatic ecosystems of the Clinch River. Already two spills have shown the severity of this threat. The Clinch River coal-fired power plant run by AEP a few miles upstream severely damaged the river through spills of alkaline fly ash slurry in 1967 and sulphuric acid in 1970. These spills affected the river for 90 miles downstream, killing over 200,000 fish. What evidence does DEQ have that Dominion has minimized the risk of a spill from this plant or a truck entering or leaving the plant?

Water loss – Dominion has requested permission to take one million gallons of water a day from the local water supply. During last year's drought, this quantity of water would have amounted to 4% of the river's flow. If the area experiences further severe drought, such a reduction could contribute to a significant loss of aquatic life. Such droughts are expected to increase due to global climate change. Has DEQ performed any hydrological studies to assess the risk being made worse by daily withdrawals from the power plant?

Landfill – The proposed landfill for the plant is scheduled to last 27 years, or about one half of the power plant's life expectancy. Has Dominion provided DEQ with a plan for where waste will be stored when that landfill is no longer able to accept its waste?

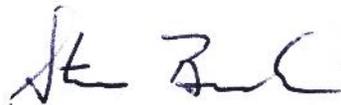
Coal dust – There could be significant coal dust pollution from the predicted 600 coal trucks per day converging on a streamside location. Has DEQ estimated the amount of coal dust that will be deposited and washed into the waterways, and an estimate of the impacts of that coal dust on human health and aquatic ecosystems?

Fly ash - Because Dominion's proposed landfill is scheduled to last 27 years, or about one half of the power plant's life expectancy, there is a good chance that fly ash will be trucked off site for storage or commercial use. Dominion has stated that the fly ash must be transported in airtight containers to avoid spillage and exposure to moisture, which causes it to harden. Has Dominion provided DEQ with a plan for transporting fly ash off site which guarantees the use of air tight containers and also includes a spill contingency plan?

Carbon sequestration – In order to address the serious long-term threat of excess carbon dioxide emissions, Dominion has said it will develop a plan to store carbon dioxide underground on the plant site. The effectiveness of this new technology, called carbon sequestration, is relatively unknown³. Has DEQ required Dominion to present an engineering plan for this? How much carbon dioxide will be pumped into the ground? Has Dominion made an adequate estimate of the capacity of the reservoir below the power plant?

In conclusion, the permit Dominion Power is requesting should take into account cumulative impacts of multiple types of pollution from many sources. The Upper Tennessee River Roundtable Board of Directors, in order to fulfill its mission, seeks to bring forward all the concerns which fall under DEQ's authority to address. We would appreciate a response from DEQ as soon as possible.

Thank you,



Steven H. Brooks
Chair, Upper Tennessee River Roundtable Board of Directors

1. Herlihy, A.T. et al. 1993. The effects of acidic deposition on streams in the Appalachian Mountain and Piedmont region of the mid-Atlantic United States. *Water Resources Research*, 29, 8.
2. The Nature Conservancy. December 2007. "Southwestern Virginia: Clinch Valley Program." <<http://www.nature.org/wherewework/northamerica/states/virginia/preserves/art15030.html>> .
3. International Energy Agency, Geologic Storage of Carbon Dioxide, www.cslforum.org/documents/geostoragesafe.pdf