To the board members of the Virginia Air Pollution Control Board

RE: concerning the proposed Virginia City Hybrid Energy Center

I write this final letter to you, the members of the Virginia Air Pollution Control Board, with heartfelt gratitude and with the highest regard to each of you who've again given an exemplary effort for our great Commonwealth in fulfilling your duties to the Governor. The measure of your worth to the citizens you serve is clear in each thoughtful question and comment you have asked of the permittee and the Department of Environmental Quality, toward understanding the complexity of this matter.

There are good reasons to ask questions. The proposed plant's design suffers greatly from the many constraints made upon it. First, it is clearly a project poised on the brink of a great change in the energy industry of our country. The request for this plant, at this point, has much more to do with the impending changes (constraints) that will inevitably ensue for fossil fuel based EGUs , than it does the permittee's claims that additional capacity are necessary for Virginia's growth. That Virginia's energy needs are real and growing is not here denied, but this great State and all states can no longer add additional capacity as a meaningful solution to this problem. It is widely conceded that our country must begin to conserve energy, and there is hope for us only if we begin by demonstrating energy gains through usage reductions before turning to additional generation.

Unfortunately, the proposed plant's design was built upon ill conceived regulatory manipulations of the CAA section 111, and its architect's were too attentive to the wishes of a myopic mining industry lobbying for not just the exclusive use of Virginia coal, but also bent on the use of mine refuse materials; deposits that clearly represent a liability to their holders both environmentally and financially.

The result of the above constraints of time and profit motives have derived the absurd mercury limits now proposed. I do not consider the present permit levels for mercury to be protective of my health or the health of anyone else. As mentioned by you Mr. Moore, the projected mercury emissions of eight Virginia power plants for 2010 combined are nearly equal to that of this one plant. That is an incredulous value and one which should never be established as a MACT limit for any plant in this State or elsewhere. Allowing such pollution now in the twenty-first century is a dishonesty to all the scientific research into toxicology done over the last fifty years. Please accept mercury limits for this plant no greater than those set forth by NAACAA (.0025 to .0060 lb/Gwh - 12 mo rolling ave.).

IGCC is not experimental technology. The Elcogas plant near Madrid is in its tenth year of operation. Its efficiency is given at 42.5% (10 to 15% higher than conventional power plants). http://www.uhde.biz/press/press_show.en.epl?stamp=140000030 A second IGCC unit is underway in Florida. Suggested amine technology for CO2 sequestration is far more experimental than IGCC power and is projected to require a 10 to 15% drain on the capacity of a conventional plant if employed. The permittee has shown no clear avenue for retrofitting their proposed plant to meet the threat of climate change. Finally, the DOE just this month has put out a draft FOA for cooperative agreements or technology investment agreement awards up to $600M per project for IGCC/CSS commercial startups. That represents a significant incentive to go back to the drawing board on this project and should be worth the consideration of the permittee's stockholders.

The time has come to deny this permit. Please make good choices.

Sincerely,

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