May 15, 2008

TO: State Air Pollution Control Board
RE: Virginia City Hybrid Energy Center

Before beginning, I would like to thank the air pollution control board for taking over the permitting process for Dominion's proposed power plant in Wise County, and, thus, fulfilling the obligation of a citizen's board in the Commonwealth of Virginia by guaranteeing all interests are served in this application process.

As a resident of Wise County, I am opposed to the construction of Dominion's power plant in St. Paul. I'm concerned about the environmental and health impacts, and socio-economic implications should Dominion succeed in building the Virginia City Hybrid Energy Center. As aspects of the permitting process have unfolded, I have become even more concerned that the negative impacts to Wise County will be forgotten in efforts to offset pollution. This was especially evident when Dominion offered to convert its Bremo power plant to gas, **if** the power station in St. Paul is built. I understand that lowering net pollution is good regionally and globally, but it may not be enough to protect the environment and public health in Wise County. If built, all the pollution from the Virginia City Hybrid Energy Center should be offset locally; resulting in no net increase in local air pollution from this plant.

It is my opinion that we, the people of Wise County, are a socio-economic group that bears a disproportionate share of the negative environmental consequences of adverse pollution effects as a direct result of consumption levels in other geographical areas. To this end, I am directing my comments to 9 VAC-5-80-1755, Impacts on "other Media," and to questions raised by air board member Vivian Thomson. Specifically: "Over the lifetime of the facility, what impacts can be expected on streams, mountain habitats, forests and ecosystems; and impacts to people (in areas mined for coal to supply the facility)." Attached you will find 4 aerial photos of surface mined land in the Wise County area taken in 2006, and a recent local newspaper article on dust from a coal mining operation in an area of Wise County called Stonega, which is in the town of Appalachia.

The Appalachian mountain region of southwest Virginia has been called one of the most ecologically diverse areas in the mid-Atlantic Northeastern United States. Yet over one-fourth of what was once beautiful bio-diverse mountain forests of hardwoods have been surface mined for coal. The drinking water for most of the mid-Atlantic and Southeast U.S. comes from the headwater source streams of Appalachia. Yet, sections of four main rivers in Wise County have been given a 303(d) designation: the Clinch, Powell, Holston and Guest Rivers. The U.S. EPA reports all three have impaired biota and sedimentation from "unknown sources." The Nature Conservancy claims the Clinch, Powell, and Holston Rivers, the last free-flowing rivers of the Tennessee River system, "harbor more at-risk fish and mussel species than any other river in the nation and the highest

concentration of imperiled species in the mainland United States." If built, Dominion's power plant and ash combustion landfill will be approximately 2.6 stream miles from the Clinch River, which has been identified as critical habitat for several mussel species at the Russell/Wise County boundary. Despite the importance of our watersheds, I could not find a plan on the local or state level specifically designed to protect them.

In Dominion's permit application, there are several areas of concern regarding impacts to streams, mountain habitats, forests, and ecosystems:

1. Deforestation is a direct result of coal mining. Dominion fails to analyze the impact of deforestation and resulting sedimentation, on local watersheds, as well as loss of critical wildlife habitat. With all of the discussion about CO2 sequestration, I haven't seen any figures from Dominion regarding how much carbon sequestration ability will be lost with the destruction of large wilderness areas in order to provide fuel for their power plant, and what plans, if any, they have to offset this.

2. AEP's Clinch River power station is a short distance from the site chosen for Dominion's new power plant. The AEP power station produces a significant amount of mercury yearly. Given the close proximity of the Clinch River power plant, and the fact that at least one local river, the Guest River, has fish advisories regarding mercury, arsenic, and PCB contamination, Dominion should be required to perform local mercury deposition testing to identify possible mercury "hotspots." Given the Clinch River's close proximity to the proposed power plant, and the Clinch's use as a municipal water source for some of the county, Dominion's permit application should also contain details regarding long-term monitoring of mercury in surrounding soil and water in order to avoid health hazards from potential biocumulation. The pollution, particularly mercury, from the diesel engines of the coal trucks used to bring fuel to the plant could also be a potential contributing source of concern, and deserves closer impact analysis.

3. According to the Virginia Department of Health, Wise County has asthma rates above the state average at 11.7%. This is the highest asthma rate in Virginia. Dust pollution from the 600-coal-trucks-a-day needed to bring the fuel to the VCHEC; dust from coal transfer points and/or piles in storage; and dust pollution from mining operations could all exacerbate the local asthma rates, given the fact that environmental exposures are one of the risk factors that trigger asthma. Local impact studies need to be done on PM 2.5 pollution to determine if exposure to ambient particulate matter is adversely affecting the health of local citizens. In order to protect the health of the public, Wise County should be a PM 2.5 monitoring site given the nature of the counties primary local industry as a major source of airborne dust. The fact that an EPA air monitor is not located in our county constitutes a "hole" in state monitoring, as winds blow northeasterly

Ms. Thomson, in her comments, has asked for answers containing quantifiable impacts. This can be a difficult thing to do, because a dollar amount hasn't been assigned to what

we are losing: the mountains we call home. A quote from the educational film, 'Razing Appalachia,' may best summarize where we find ourselves: "…caught between the national appetite for cheap energy and an enduring sense of Appalachian culture, pride, and natural beauty." Coal energy does not come without a cost to the people and the environment.

Instead of being the potential site of a power plant, Virginia City should have been preserved and protected for its special historical values: the site of the first town in the county; as well as the first church, public school, railroad, and coal mine. Many of the people who still remain in what is left of Virginia City have family roots that go back to the 17th century. The "locals" will tell you about the rare green lizards to be found in Meade Creek, and the locations of various Native American Indian burial mounds (one of which can be found in what will be Dominion's landfill if this power plant is built). I recently read, "For each power plant built, it's big profits for energy but bad news for the Earth." Those of us living in southwest Virginia only have to look around to know that we are living every day with the proof of this statement.

C. M. Cantrell
Norton, Virginia

April 25, 2008 'Coalfield Progress' newspaper
Luntsford pleads for Stonega dust solution ODI DEAL / Staff Writer

WISE Residents of Stonega are living in a dust bowl, District One county Supervisor Fred Luntsford says.

Coal trucks coming off of surface mines track mud and coal dust onto roads, which dries and goes airborne, coating houses, yards, people and everything else in the neighborhood with dust, Luntsford told Virginia Department of Transportation representative ackie Christian at a recent supervisors meeting.

He s complained about it before, but nothing seems to have been done, Luntsford said.

It s atrocious what these people have to live through, said Luntsford, who is also town manager of Appalachia. I ve brought this up before, and people say they re sorry, but nothing gets done. I want to know what we can do for those people

Luntsford asked Christian if any laws or regulations exist that could be effectively enforced to keep coal camp roads a little cleaner.

I m not against these coal operators having their business, or coal truckers do their business, but there s got to be some way to strike a happy medium, Luntsford said, adding that residents have to wear masks to mow their grass.

Christian acknowledged that the dust is a problem in Stonega, and also in Derby.

We have worked with DMME, Christian said, referring to the Virginia Department of Mines, Minerals and Energy. They ve put in some washers that help some, but it s still a problem a very bad problem.

According to Christian, a solution would have to be a combined effort of VDOT, DMME and local coal operators.

Luntsford agreed, and said he d like to see supervisors facilitate that combined effort. However, supervisors took no official action on the matter that night.