



Disclaimer:

This document was not produced by DEQ. Some of its content may not be in an accessible format pursuant to Section 508 of the federal Rehabilitation Act of 1973, as amended (29 U.S.C. § 794 (d)). Please call 800-592-5482 if you need assistance.



Sinclair, Alison <alison.sinclair@deq.virginia.gov>

Request for Air Pollution Control Board hearing on Chickahominy Power

1 message

Glen Besa <glenbesa@gmail.com>

Thu, Feb 28, 2019 at 6:36 PM

To: alison.sinclair@deq.virginia.gov

APPLICANT NAME AND REGISTRATION NUMBER: Balico LLC; 52610 FACILITY NAME AND ADDRESS: Balico LLC/Chickahominy Power, 1380 Coppermine Rd. Ste.115, Herndon, VA 20171

Dear Ms. Sinclair:

I am requesting that the PSD air permit for the above referenced Chickahominy Power project be heard before the Virginia Air Pollution Control Board.

This an exceptionally large combined cycle gas plant at 1600 MWs located in a rural county that has a majority minority population including a sizable Native American population of 6.9% in the last census. I understand that these are ancestral lands of the federally recognized Chickahominy Native American Tribe and that tribal members have raised environmental justice concerns related to the disproportionate impacts of this project.

Given the completion of the Skiffes Creek transmission line, there is no need for this power plant for reliability purposes. Because of the absence of any need for this project, in particular, and its anticipated disproportionate impact on minorities populations, **I am requesting that this PSD permit be heard by the Air Pollution Control Board.** Additionally, with DEQ's pending regulations to reduce CO2 emissions from fossil fuel power plants, the impact 6,479,692 tons of CO2e from this plant should be evaluated in the context of these new regulations to address climate change and meet carbon pollution targets under the Northeast Regional Greenhouse Gas Initiative (RGGI).

Thank you,

Glen Besa

[4896 Burnham RD](#)[North Chesterfield, VA 23234](#)glenbesa@gmail.com

c-804-387-6001



Sinclair, Alison <alison.sinclair@deq.virginia.gov>

Balico LLC/Chickahominy Power

1 message

Finley-Brook, Mary <mbrook@richmond.edu>

Thu, Feb 28, 2019 at 9:30 PM

To: "alison.sinclair@deq.virginia.gov" <alison.sinclair@deq.virginia.gov>

APPLICANT NAME AND REGISTRATION NUMBER: Balico LLC; 52610

FACILITY NAME AND ADDRESS: Balico LLC/Chickahominy Power, 1380 Coppermine Rd. Ste.115, Herndon, VA 20171

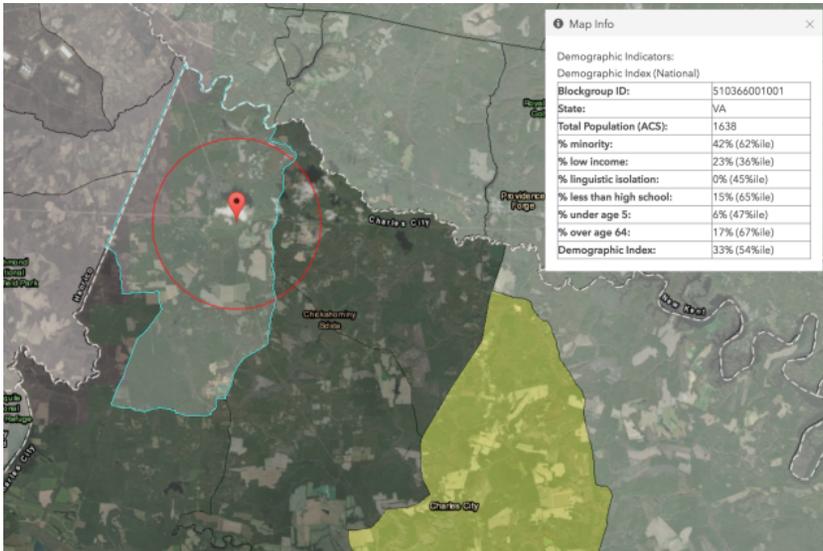
Dear Ms. Sinclair:

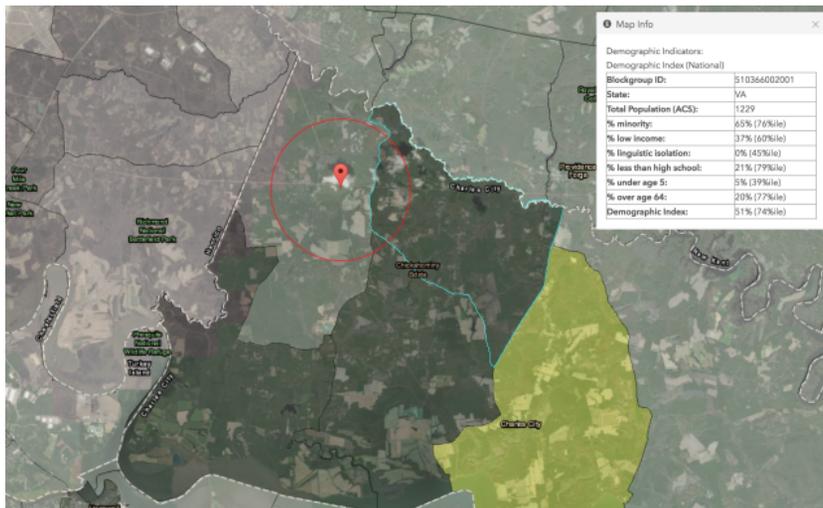
I am requesting that the PSD air permit for the above referenced Chickahominy Power project be heard before the Virginia Air Pollution Control Board. This an exceptionally large combined cycle gas plant at 1650 MWs with significant potential emissions, as shown in Table below from 2019 engineering analysis as submitted with the permit application.

Table 2 - Expected emissions from the proposed facility are as follows:

Pollutant	Option 1: GE Emissions (tons/yr)	Option 2: MHPS Emissions (tons/yr)
NO _x	368	407
CO	398	323
SO ₂	54	62
VOC	74	211
PM (filterable only)	168	169
PM ₁₀	168	169
PM _{2.5}	168	169
CO _{2e}	5,779,348	6,479,692
Sulfuric acid mist (H ₂ SO ₄)	37	65
Acrolein	0.20	0.23
Formaldehyde	8.81	9.86
Beryllium	0.00058	0.00064
Cadmium	0.053	0.059
Chromium	0.067	0.075
Lead	0.024	0.027
Mercury	0.013	0.014
Nickel	0.10	0.12

The proposed plant is located in census tracts (shown below) that are 42% and 65% minority, requiring analysis of the populations located closest to the facility to assure there is not an even higher cluster that might be hidden in the aggregated data at the census tract level. Existing industry around this site demonstrates the need to consider to existing burden of hazardous pollutants so as to not avoid disproportionately impact to marginalized or vulnerable populations.





These are ancestral lands of the federally recognized Chickahominy Native American Tribe and that tribal members were not consulted. International standards found in the United Nations Declaration of the Rights of Indigenous Peoples require free, prior and informed consent (FPIC).

Given the completion of the Skiffes Creek transmission line, this power plant is not necessary for reliability purposes. Recent investments in energy efficiency and renewable energy will reduce demand further. Because of the absence of any need for this project and its anticipated disproportionate impact on minorities populations (i.e., siting), **I am requesting that this PSD permit be heard by the Air Pollution Control Board.** Additionally, with DEQ's pending regulations to reduce CO2 emissions from fossil fuel power plants, the impact 6,479,692 tons of CO2e from this plant should be evaluated in the context of these new regulations to address climate change and meet carbon pollution targets under the Northeast Regional Greenhouse Gas Initiative (RGGI).

Thank you,

Mary Finley-Brook, PhD

Associate Professor of Geography and Environmental Studies

#310 Carole Weinstein International Center

University of Richmond

Richmond VA, 23173

(804) 287-6307

<http://geography.richmond.edu/faculty/mbrook/>