



King William County
Est. 1702

Board of Supervisors

William L. Hodges, Chairman
Board of Supervisors

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February 28, 2019

Dear Ms. Sabasteanski,

I am writing to provide comments to the Department of Environmental Quality and the Air Pollution Control Board in opposition to the re-proposed "Regulation for Emissions Trading" for the CO2 Budget Trading Program. I have previously submitted comments and would ask that they be incorporated by reference.

As a resident of King William County and the Chairman of the Board of Supervisors, I can attest to the critical importance of the West Point Paper Mill to our county. The Mill is one of the largest employers, one of the largest taxpayers, and one of the most significant corporate members of our community. The hundreds of jobs that the mill provides, the hundreds more that it supports, and the millions of dollars that it injects into the local economy are irreplaceable.

With that in mind, I oppose the re-proposed regulation because it does not exempt emissions from biomass, which is widely considered to be a carbon-neutral fuel source and is the lifeblood of the West Point mill. While DEQ states that the rule is designed to address CO2 emissions from fossil fuel combustion, the rule as it is currently written would go well beyond that and regulate CO2 emissions from non-fossil sources when those sources are co-fired with fossil fuels. The Air Board should adopt language that specifically and clearly exempts non-fossil fuel sources from the regulation.

Further, I would encourage the Board to extend the exemption for industrial generation to new facilities as well as those currently in operation. Should the exemption ultimately apply only to existing facilities, the Board should adopt any language necessary to clarify that the exemption applies at the facility level (rather than to individual boilers) to allow facilities to conduct proper maintenance and grow.

On behalf of myself and those that I represent that understand the importance of the West Point mill, I appreciate your consideration of my comments.

Sincerely,

William L. Hodges
Chairman, King William Board of Supervisors

King William County
180 Horse Landing Road, #4
King William, VA 23086
804-769-4927 804-769-4964 (fax)
www.kingwilliamcounty.us