

Metropolitan Washington Air Quality Committee

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March 10, 2008

Rob Feagins
Virginia Department of Environmental Quality
Southwest Regional Office
355 Deadmore St.
P.O. Box 1688
Abingdon, Virginia 24212

RE: Proposed Coal-Fired Power Plant in Wise County

Dear Mr. Feagins:

I am writing to you on behalf of the Metropolitan Washington Air Quality Committee (MWAQC). I am writing in response to Virginia DEQ's request for comments regarding the proposed Virginia City Hybrid Electricity Center. On January 9, 2007, the Virginia Department of Environmental Quality (DEQ) issued a Public Notice on a draft permit authorizing Dominion Virginia Power (Dominion) to construct and operate a 668 megawatt (gross electrical generating capacity) coal-fired electric power plant in Wise County, Virginia.

MWAQC is the Clean Air Act Section 174 entity certified to prepare regional air quality plans for the Washington DC-MD-VA non-attainment area. Its membership includes local elected officials from throughout the region, state air and transportation agencies, and state legislature representatives.

Because air quality in the metropolitan Washington, DC region does not meet the National Ambient Air Quality Standards for ozone and fine particles, emissions of regulated pollutants from the proposed plant are a concern to MWAQC. A review of the draft permit indicates that the impact of the plant's emissions on the Metropolitan Washington Region, air quality as well as greenhouse gas emissions, have not yet been assessed. We are concerned that the plant's emissions may potentially pose health risks to residents in the metropolitan Washington region, jeopardize the region's ability to demonstrate attainment of the federal air quality standards, and hinder the region's on-going efforts to reduce air pollutants and greenhouse gas emissions.

The draft permit proposes limits on the emissions of certain pollutants, including particulate matter, nitrogen oxides, sulfur dioxide, and carbon monoxide. The Prevention of Significant Deterioration (PSD) analysis in the draft permit application, while technically satisfying regulatory requirements, does not address long range transport of air pollutants beyond 300 kilometers. Unless certain criteria are met, the PSD process neither requires Dominion to model, nor requires DEQ to consider, the impact of the plant's emissions on air quality beyond a 186 mile distance (300 km) from the proposed plant. In the absence of such data it is unknown (1) whether or how emissions from the Virginia City plant will affect the region's air quality, and (2) whether any air quality impacts may require further emissions reductions and additional reduction measures in the region to meet federal standards. We

believe further analysis is needed to determine the potential impact of emissions from the Virginia City plant on the metropolitan Washington region's future air quality.

The recent commitment by Dominion Virginia Power to convert its coal-fired units at the Bremono Power Station located in Fluvanna County 100 miles south of the metropolitan Washington region, to natural gas by 2014 is a positive step that MWAQC supports. According to data provided by VA DEQ, the Bremono Bluffs conversion will offset statewide NOx and SO₂ emissions increases attributable to the proposed Wise County plant. MWAQC requests that the DEQ strongly encourage, support, and facilitate the conversion of the Bremono power plant from coal to natural gas.

The draft permit does not address the projected 4 to 5 million tons of carbon dioxide (CO₂) that the plant is expected to emit annually. This new source of greenhouse gas emissions represents more than half of the reductions currently being considered for the metropolitan Washington region for 2012. In addition, while the applicant has made a commitment to implement carbon sequestration technology, no such technology exists at this time or in the foreseeable future. Therefore, this plant would in effect emit over 4 million metric tons of carbon dioxide annually. This is inconsistent with the efforts of governments in the Metropolitan Washington Region to reduce greenhouse gas emissions to 2005 levels by 2012 and to reduce emissions 20 percent below 2005 levels by 2020.

MWAQC requests that Virginia DEQ analyze projected emissions through modeling from the proposed Wise County facility on the Washington region's ability to continue to meet federal air quality standards if the plant comes on line. We are willing to work with Virginia DEQ to assist in this effort. Also, MWAQC requests that Virginia DEQ and Dominion conduct a technical analysis of the greenhouse gas emissions from the proposed facility relative to the Washington region inventory and the potential implications of constructing the facility may have in lessening the benefits from actions being contemplated to reduce greenhouse gas emissions in the region.

MWAQC also seeks a thorough analysis of possible alternatives including renewable energy and energy conservation prior to approval of the proposed coal-fired facility. Further, the DEQ should support further engagement with owners of coal-fired power plants in Virginia to convert coal-fired plants to cleaner fuel sources or to incorporate more advanced emission control technologies where feasible.

Sincerely,



Hon. David Snyder, Chair