Public Comments – NGO Comments on Old Dominion Electric Cooperative Power Plant

Hampton Roads Planning District Commission

October 20, 2010

Agenda Item #2

HAMPTON ROADS
PLANNING DISTRICT COMMISSION

Southern Environmental Law Center

201 West Main Street, Suite 14
Charlottesville, VA 22902-5065
434-977-4090
Fax 434-977-1483
SouthernEnvironment.org

October 20, 2010

Hampton Roads Planning District Commission
2101 Executive Drive
Hampton, Virginia 23666

VIA ELECTRONIC MAIL

Dear Members of the Commission:

Thank you for taking the time to hear from us about one issue of particular concern to Hampton Roads: Old Dominion Electric Cooperative's (ODEC) proposal to construct the largest, coal-burning power plant in Virginia, just thirty miles from the Chesapeake Bay.

Although ODEC has withdrawn applications that had been pending before the Department of Environmental Quality (DEQ), this project is far from cancelled. ODEC has explained that it intends to re-file with DEQ within two years. Meanwhile, the U.S. Army Corps of Engineers continues to process ODEC's submittals.

Just a few of the risks presented by the coal plant are:

- Worsening ground-level ozone pollution that would threaten to push Hampton Roads into nonattainment;
- Increased nitrogen pollution that would undermine efforts to clean up the Chesapeake Bay; and
- Toxic mercury emissions roughly ten times higher than those from Dominion's Virginia City Hybrid Energy Center, currently under construction in Southwest Virginia.

There is no need to take these risks; the power plant is not needed.

Last April, ODEC supported its proposal by warning that we were "on the razor's edge of blackouts."[1] Yet more recently, it has found "slower than expected growth in the demand for electricity."[2] Claims that Virginia will need an additional 7200 megawatts over the next ten years are based on an exaggerated growth rate of 2.26% per year – more than double the rate forecast by the U.S. Department of Energy. Staff for the State Corporation Commission has testified that even a 2.0% growth rate would be "unrealistically high," observing that "recent trends in electricity consumption don't support that much growth."[3]

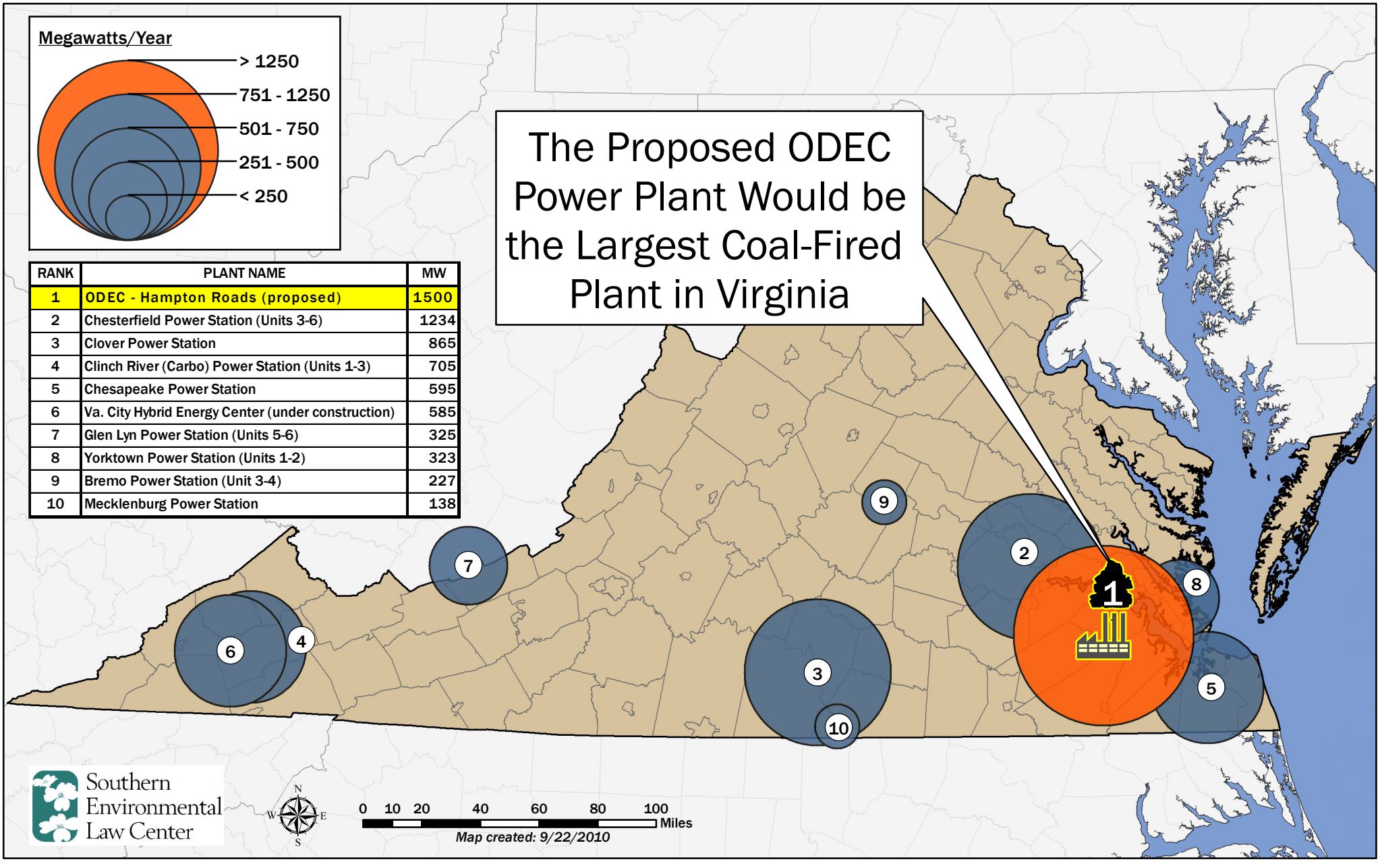
Given these trends, now is the time to encourage a vigorous review by the Army Corps of Engineers of all practicable alternatives.

Sincerely,

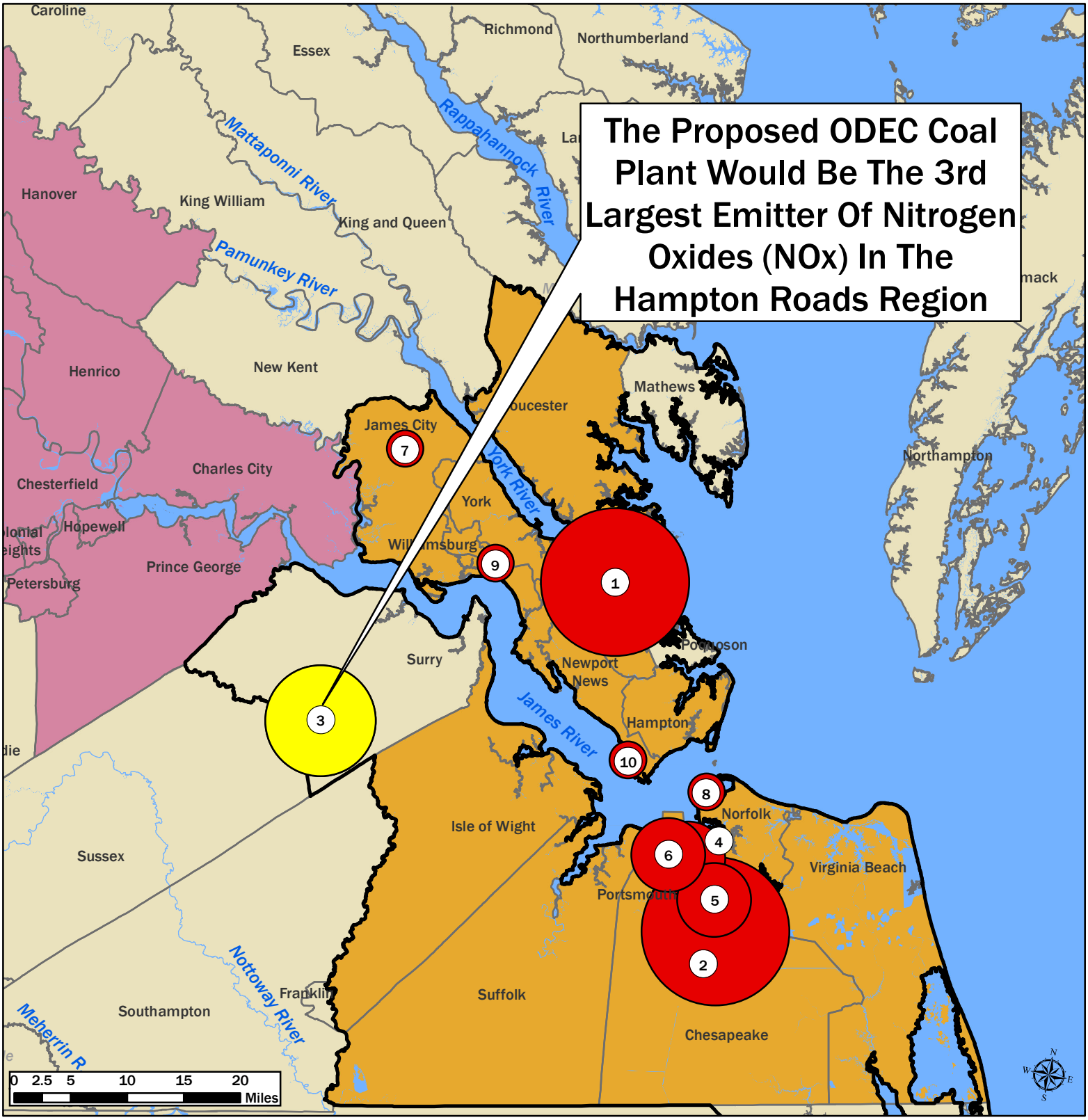
Cale Jaffe, Senior Attorney

[1] "Demand, Cost Local Although Coal Plant Wouldn't Be," *Williamsburg-Yorktown Daily* (April 7, 2010),
[2] Press Release, "ODEC Announces Plans to Extend Timeline for Cypress Creek Power Station Project," (Sept. 8, 2010).
[3] PUE-2009-00023, Exhibit 15 (Direct Testimony of witness, J. Nicolas Puga), at 34.

The Proposed ODEC Power Plant Would be the Largest Coal-Fired Plant in Virginia

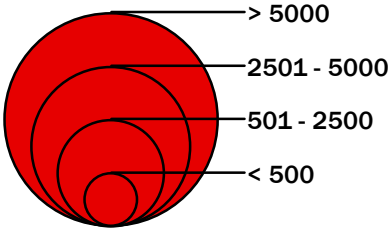


RANK	PLANT NAME	MW
1	ODEC - Hampton Roads (proposed)	1500
2	Chesterfield Power Station (Units 3-6)	1234
3	Clover Power Station	865
4	Clinch River (Carbo) Power Station (Units 1-3)	705
5	Chesapeake Power Station	595
6	Va. City Hybrid Energy Center (under construction)	585
7	Glen Lyn Power Station (Units 5-6)	325
8	Yorktown Power Station (Units 1-2)	323
9	Bremo Power Station (Unit 3-4)	227
10	Mecklenburg Power Station	138



Top 10 NOx Emitters in the Hampton Roads MSA*		
Rank	Facility Name	TPY
1	Dominion - Yorktown	7,410
2	Dominion - Chesapeake	7,046
3	**ODEC - Hampton Roads Plant**	**3,070**
4	Cogentrix Virginia Leasing Corp.	1,686
5	SPSA Waste To Energy	1,632
6	SPSA Waste To Energy	1,362
7	Owens-Brockway Glass Container Inc.	426
8	US Navy Norfolk Naval Base	397
9	Anheuser-Busch Inc.	318
10	Newport News Shipbuilding & Dry Dock Co.	310

Stationary NOx Emitters
Tons Per Year



Hampton Roads MSA*

Pending Recommendation for U.S. EPA Nonattainment Area - Ozone

Norfolk-Va. Beach-Newport News, VA

Richmond-Petersburg, VA

* = Metropolitan Statistical Area
Map Updated: September 29, 2010
Data Sources: National Emissions Inventory (EPA); USGS; ESRI

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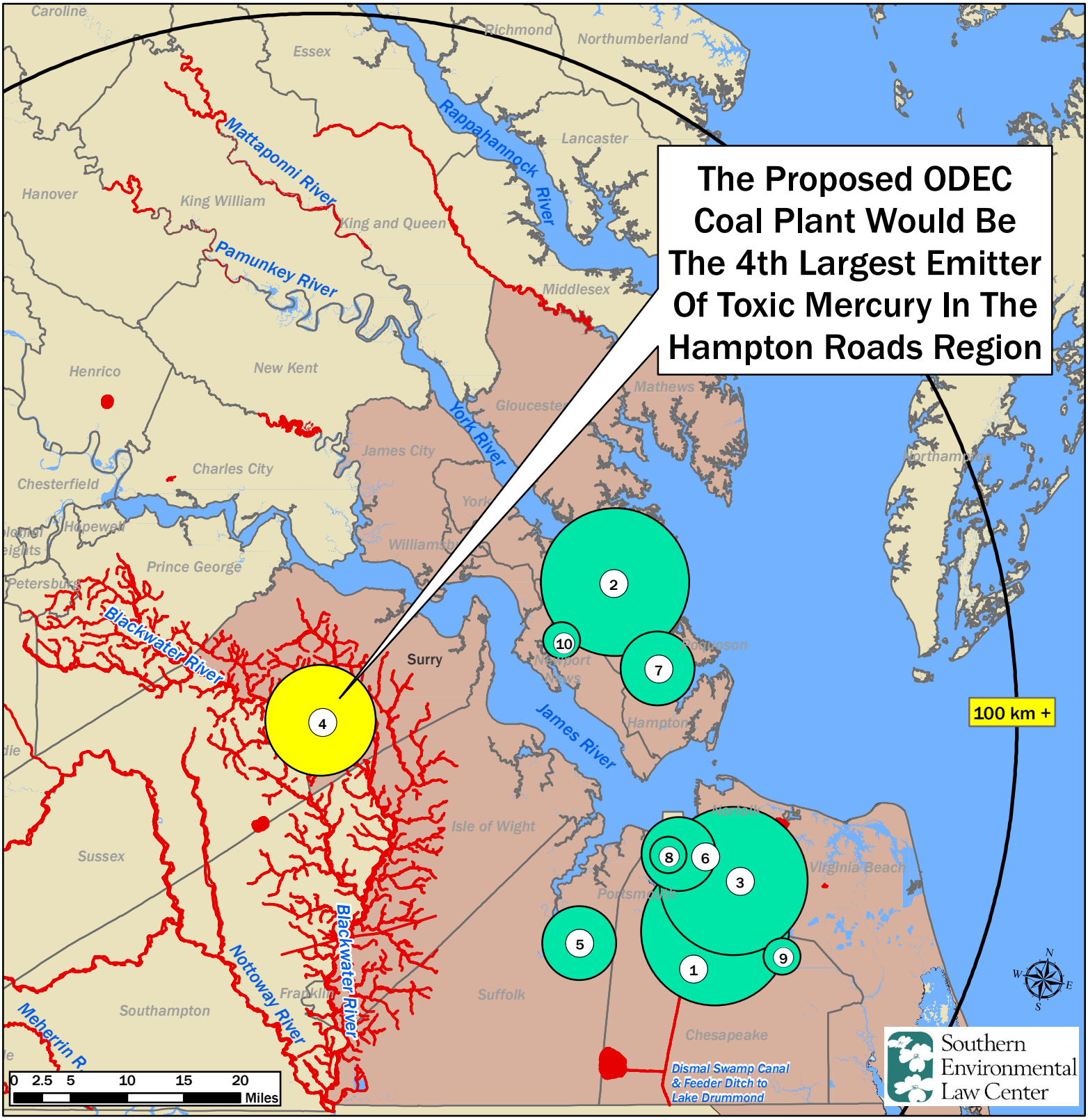
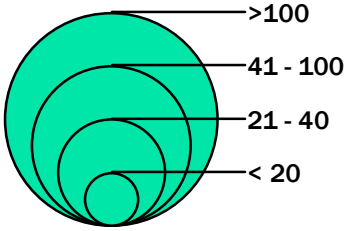


Top 10 Mercury Emitters in the Hampton Roads MSA*		
Rank	Facility Name	Lbs/Year
1	Dominion - Chesapeake	171
2	Dominion - Yorktown	142
3	Stericycle Inc.	116
4	**ODEC - Hampton Roads Plant**	**44**
5	SPSA Regional Landfill	40
6	Cogentrix Virginia Leasing Corp.	33
7	NASA Refuse-fired Steam Plant	25
8	SPSA Waste To Energy	15
9	Thrasher Debris Landfill	< 1
10	Newport News City Landfill	< 1

Stationary Mercury Emitters
Hg_LbsPrYr



Hampton Roads MSA*

Mercury Impaired Water or Advisory (US EPA or Va. Dept. of Health)

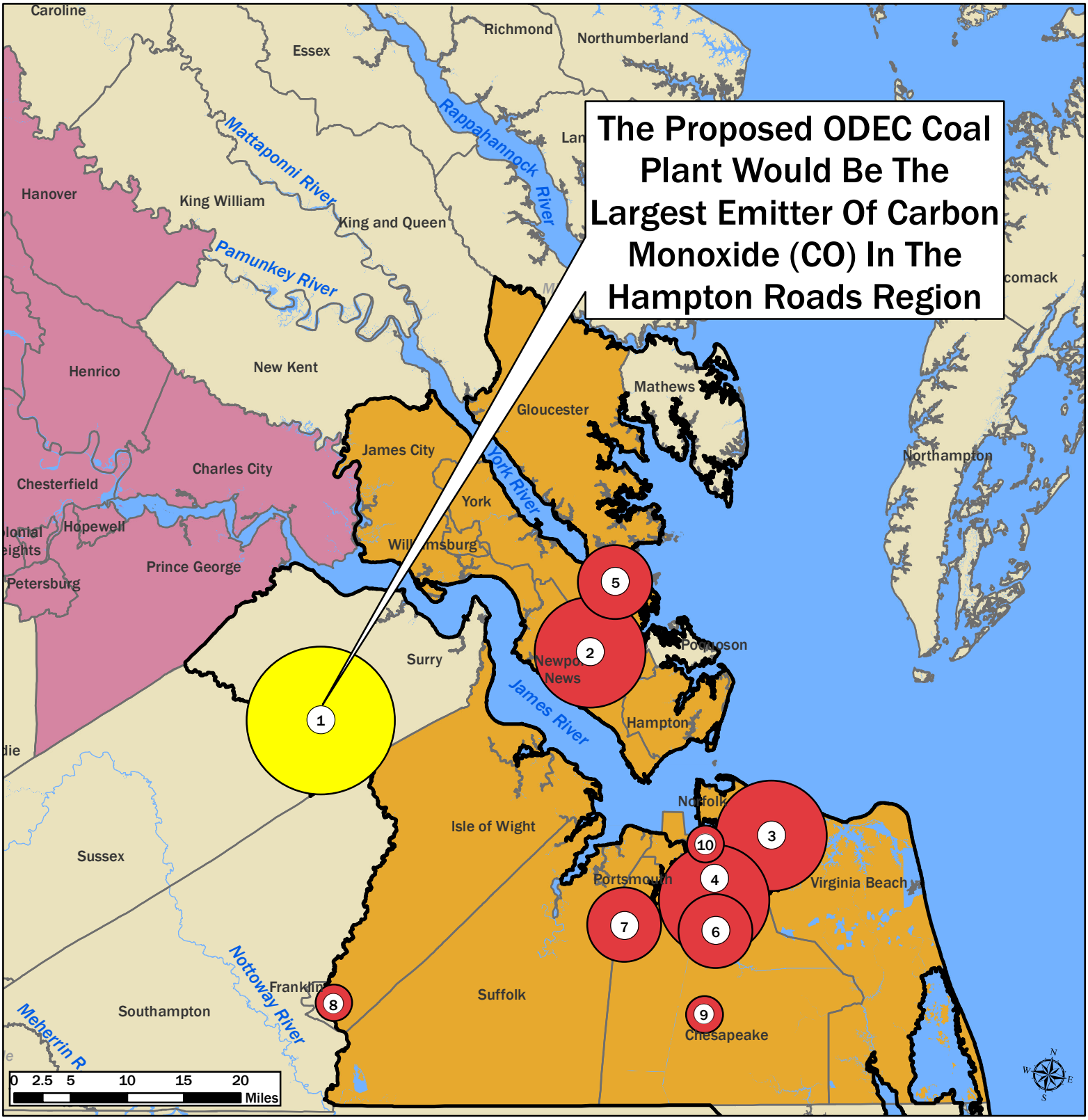
Rivers and Streams

Lakes and Reservoirs

Map Created: September 29, 2010
Data Sources: National Emissions Inventory (EPA), Virginia DEQ, USGS, ESRI

* = Metropolitan Statistical Area
+ = Most mercury deposition occurs within 100 km of the coal plant. M. Cohen, NOAA, Modeling the Fate and Transport of Atmospheric Mercury in the Chesapeake Bay Region (May 17, 2004).

The Proposed ODEC Coal Plant Would Be The Largest Emitter Of Carbon Monoxide (CO) In The Hampton Roads Region



Top 10 CO Emitters in the Hampton Roads MSA*		
Rank	Facility Name	TPY
1	**ODEC - Hampton Roads Plant**	**10,440**
2	Newport-News/Williamsburg Intl. Airport	1,006
3	Norfolk Intl. Airport	681
4	SPSA Waste To Energy	623
5	Dominion - Yorktown	487
6	Dominion - Chesapeake	382
7	Hampton Roads Executive Airport	231
8	ATC Panels	147
9	Chesapeake Regional Airport	136
10	HRSD Virginia Initiative Treatment Plant	133

Stationary CO Emittors
Tons Per Year

- > 1500
- 501 - 1,500
- 201 - 500
- < 200

Hampton Roads MSA*

Pending Recommendation for U.S. EPA Nonattainment Area - Ozone

- Norfolk-Va. Beach-Newport News, VA
- Richmond-Petersburg, VA

* = Metropolitan Statistical Area
Map Created: September 29, 2010
Data Sources: National Emissions Inventory (EPA); USGS; ESRI

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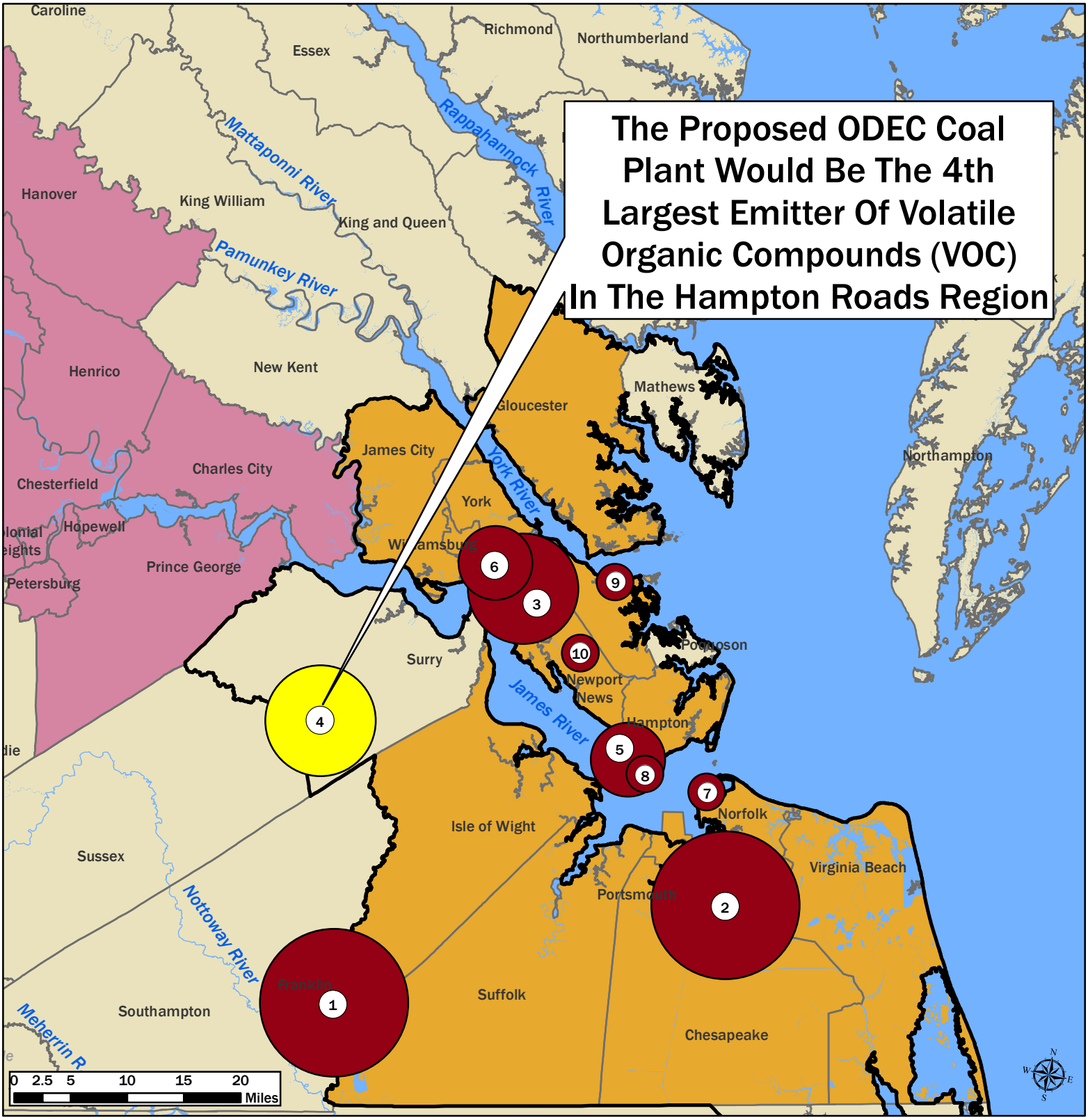
The Proposed ODEC Coal Plant Would Be The 4th Largest Emitter Of Volatile Organic Compounds (VOC) In The Hampton Roads Region



Top 10 VOC Emitters in the Hampton Roads MSA*		
Rank	Facility Name	TPY
1	ATC Panels	436
2	Perdue Farms - Soybean Crushing Plant	423
3	Ball Metal Beverage Container Corp.	348
4	**ODEC - Hampton Roads Plant**	**246**
5	Newport News Shipbuilding & Dry Dock Co.	191
6	Anheuser-Busch Inc.	162
7	US Navy Norfolk Naval Base	75
8	Mica Company of Canada Inc.	75
9	Dominion - Yorktown	68
10	Siemens VDO Automotive Corp.	68

Stationary VOC Emittors
Tons Per Year

> 400
201 - 400
101 - 200
< 100

Hampton Roads MSA*

Pending Recommendation for
U.S. EPA Nonattainment Area - Ozone

Norfolk-Va. Beach-Newport News, VA

Richmond-Petersburg, VA

* = Metropolitan Statistical Area
Map Created: September 29, 2010
Data Sources: National Emissions Inventory (EPA); USGS; ESRI

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The Virginian-Pilot

Facebook flick is a topical thriller getting Oscar buzz.
MOVIE REVIEW, THE DAILY BREAK

Saturday

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Keep focus on plans for coal plant

By BOB BURNLEY

The air quality in Hampton Roads is already suffering from ozone pollution, and should this plant be built, it would become measurably worse.

OLD DOMINION Electric Cooperative recently announced postponement of efforts to secure air permits for a proposed 1,500 megawatt, coal-fired power plant in Surry County. Abandoning the plan would be good news for the health of the citizens of Hampton Roads and the Peninsula, the Chesapeake Bay and the region's economic future.

However, ODEC has not abandoned this bad idea. It's moving forward to secure approvals from the Army Corps of Engineers and continues to oppose landowners who are challenging radical zoning changes that will transform Dendron from a historic, agricultural community into a home for heavy industry.

Many citizens of Dendron and Surry don't want this plant, don't need it and recognize its dangers.

The plant would make existing environmental and economic problems in the region worse. According to the Asthma and Allergy Foundation of America, Virginia Beach ranks 45th on a list of the "most challenging places to live with asthma." Richmond is No. 1. Three thousand tons of ozone-producing nitrogen oxides and 2,000 tons per year of particulate matter from the plant, just upwind from Virginia Beach, would exacerbate this.

The plant would emit mercury, a neurotoxin. Babies exposed before birth can suffer reduced IQ levels and other neurological problems. Children exposed can suffer learning disabilities and other health issues. There has to be a healthier way to generate electricity.

Citizens across the Bay watershed are paying hundreds of millions of dollars to remove nitrogen from discharges to the Bay and its tributaries. This plant and the thousands of tons of nitrogen compounds emitted from its smokestacks could very well doom the Bay, the region's watermen and a thriving tourist industry. There must be a less polluting way to generate power.

Jobs, especially in manufacturing, are becoming fewer and fewer in Hampton Roads and Virginia. One of the primary criterion used when an employer looks for a location for a new industry or an opportunity to expand an existing industry is air quality.

Good air quality equals less expensive, more timely, more predictable permitting. It equals a good quality of life for employees. It equals less lost work time due to asthma attacks and other health problems.

Tourism is also an important component of Virginia's and Hampton Roads' economy. More smog and code-red days when the air is not safe to breathe will not encourage growth in the tourism industry. There must be a less economically destructive way to generate the power we need.

Hampton Roads and the Peninsula will receive little, if any, electricity or any other benefit from this plant. ODEC has been fond of telling us in the past that there is a critical need for the power that will come from this plant. It's said we're "on the razor's edge of blackouts."

But there is a glut of electricity on the grid. During the hottest summer on record in Virginia, there were no blackouts, no brownouts, no calls for conservation from the power companies despite outages at Virginia's two major nuclear power plants.

On the contrary, demand is decreasing, and at least one power company in Virginia is mothballing generating capacity. Even if the power need were real, that does not justify a system that is this polluting in a highly populated region with serious, existing environmental problems.

The energy available in offshore wind and tidal generation has not been tapped. The tides are predictable and powerful, and the fuel is free. There is a better way to generate electricity.

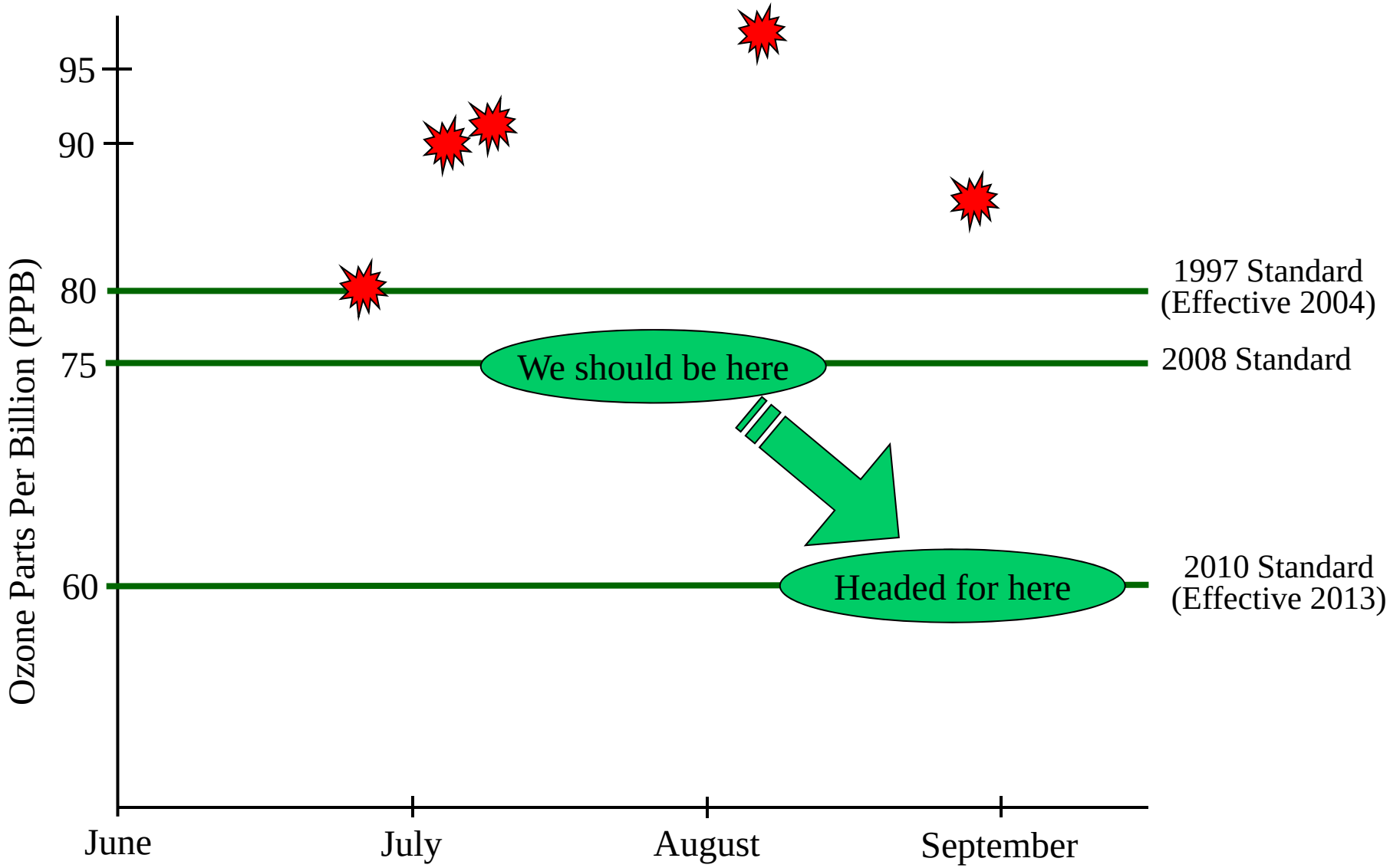
Don't be lulled into complacency by the postponement of this plant. Citizens must stay engaged.

If this plant is approved, millions of people in southeastern Virginia will lose. It ain't over 'til it's over, and it won't be over until the Army Corps or the state kills it, or ODEC does the responsible thing and withdraws all of its pending applications.

You have to give them the reasons and the courage to do just that. It really is up to you.

Bob Burnley, director of the Virginia Department of Environmental Quality under Gov. Mark Warner, is president of an environmental advisory firm for government and industry. E-mail: rgburnleylic@comcast.net.

Hampton Roads Relative to Ozone Standards in 2010



Data source: Virginia Department of Environmental Quality, "Eight-hour Ozone Exceedences (2010)," http://www.deq.virginia.gov/airquality/2010exceed.html