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THIRTY-FIFTH DISTRICT

COMMONWEALTH OF VIRGINIA

HOUSE OF DELEGATES
RICHMOND

COMMITTEE ASSIGNMENTS:
EDUCATION
FINANCE
COMMERCE AND LABOR
AGRICULTURE CHESAPEAKE AND NATURAL
RESOURCES

September 21, 2018

VIA EMAIL TO: airdivision1@deq.virginia.gov

Commonwealth of Virginia
Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Rd
Glen Allen, VA 23060

Re: State Air Pollution Control Board Permit for Buckingham Compressor Station

To whom it may concern:

I respectfully request the Department of Environmental Quality (DEQ), and the State Air Pollution Control Board (Board) to deny the air pollution permit for the Atlantic Coast Pipeline's compressor station proposed in Buckingham County.

This compressor station is designed to produce 54,000 horsepower, which is one of the largest ever proposed by Dominion Energy. A compressor of such huge magnitude spewing out toxins into the air threatens the health of the residents of Union Hill. Therefore, I urge the Board and DEQ immediately to complete a thorough risk assessment prior to any permitting and to work with other state agencies to conduct comprehensive health risk and impact assessments at the beginning of future permitting processes.

I also oppose the issuance of the permit because I believe the information presented to the government is incomplete and/or misleading in material ways. For example, DEQ's Intra-Agency Memorandum analyzing the draft permit states that a site evaluation led the agency on October 31, 2017, concluded that the area surrounding the site was "sparsely populated." However, research done by local community groups indicates that the area immediately nearest to the proposed compressor station is more densely populated than DEQ's report suggests.

I have personally been to the proposed site myself and have met with numerous residents who live close to the location who shared their concern that their physical presence is not accounted for in the reports presented to the government, and that they are fearful of the health risks they face in the event of an emergency arising out of the compressors.

A particularly significant concern to me is the fact that this community of residents in Union Hill is 85 percent African American, including two historic African American Baptist churches. This community is of tremendous historic significance to the story of the Commonwealth of Virginia. Union Hill was the home of some of America's first freed slaves, and it remains the home of many of their descendants.

Placing a compressor station of an unprecedented magnitude in the Commonwealth, with imminent danger of toxic leaks of methane, nitrous oxides, particulate matter and other volatile organic compounds just miles from their homes and schools, would appear to violate principles of environmental justice.

I note that the Governor's own Advisory Council on Environmental Justice share my concerns over racially discriminatory impact of this proposal. In May, the Council met with dozens of residents in Buckingham County who are living in fear of another set of health and environmental hazards anticipated from the pipelines. Based on the economic and racial demographic disparities, the Council unanimously issue a letter to Governor Northam stating that placing a compressor station in Union Hill would be a form of environmental racism.

The DEQ and the Board have unique and critical responsibilities to protect our most vulnerable citizens from the dangers of fossil fuel pollution. Knowing what we know about the risks to citizens at this stage of the proposal, I believe the most responsible decision is for the DEQ and the Board to deny the air permits for these projects.

Finally, I urge the DEQ and the Board to extend the public comment period for this permit to October 8, 2018, to allow for full and fair consideration of the many questions that have been raised.

Thank you for your time and consideration of this very important matter.

Sincerely,



Mark L. Keam
Member, House of Delegates