

Piedmont Regional Office
Re: Buckingham Compressor Station
4949-A Cox Road
Glen Allen, VA 23060

Dear Members of the Air Pollution Control Board,

I write to oppose the air permit for the Buckingham compressor station. I hope that you will prevent an environmental injustice and preventable public health impact because you cannot find reasonable assurance that the health and safety of the people of Union Hill will be protected.

Environmental Justice/Location

- Dominion demands a connection to Transco, which they could do from the Midland site that they already own and that does not have significant population nearby.
- The Transco connection should not be a sufficient reason to approve this site as it has been shown that Virginia residents do not need the gas. The gas will be shipped through Transco to Cove Point Maryland for export.
- Dominion chose the Union Hill site and then used limited and unreliable census data to justify their decision.
- DEQ did not do an environmental justice analysis as required by Title 6 of the Civil Rights Act.
- The Governor's Council on Environmental Justice found EJ concerns along the entire route of the ACP, including the determination that siting the compressor station in Union Hill is environmental racism.
- The NAAQS cannot reasonably be used as a justification for no disproportionate impact because they "apply to everyone."
- See my comment for September 21, where I show that there is already a disproportionate burden of air pollution in Buckingham County compared to other locations in Virginia. Buckingham has .49 tons of annual air pollution burden per capita.
- Since the population within a mile of the proposed station is 83% minority, with elders and children present, you must reject this location for disproportionate impact.

Health Impacts

- The NAAQS have documented limitations for protection of human health.
- The only data DEQ provides to make the claim that human health is protected is from modeling of regional air quality. They have no data on the impacts to people who live there.
- Regional ambient air quality standards do not provide any assurance at the local level where emissions are intense, episodic and short-lived.
- The stress and harm, including the divide and conquer tactics by Dominion are not addressed by a narrow focus on the pollution.
- The proposed CEMS is not protective; it should include PM2.5 as ASTDR health consultations have found unacceptable levels of PM2.5 in households near compressors. (See my 9/21/2018 comment for citations.)
- All new CO2 equivalents released will contribute to climate change which has documented negative impacts on human health.
- DEQ holds that the pollution will be gone by the fenceline, if that is true then staff and Dominion executives should go live there. Ample evidence from communities near compressor stations proves the harm from these industrial facilities.

Best regards,
Suzanne J. Keller, retired epidemiologist, Virginia Department of Health