



Virginia State Conference NAACP

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By Electronic Mail

September 21, 2018

Mr. David Paylor
Director
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, Virginia 23218

Re: Buckingham Compressor Station- Air Permit

On behalf of the Buckingham County NAACP and the Virginia State Conference NAACP, we are writing to express our opposition to the granting of an air permit for the Atlantic Coast Pipeline Compressor Station in Buckingham County, Virginia. Our opposition is based on the following:

1. The demographic and cultural and historic data used by the applicant is not accurate.
2. The air modeling used by the applicant is not adequate.
3. There has not been a qualitative risk assessment and comprehensive Health Impact assessment completed by the applicant.

Furthermore, we also request the comment period be extended for no less than 60 days.

1 - We ask that all activities associated with constructing the pipelines are halted until accurate demographic, cultural and historic data are submitted by the applicant. Furthermore, we ask that the applicant work collaboratively with all local residents and property owners to make sure the community's intrinsic resources are included, particularly those with significant historic and cultural value (i.e. unmarked gravesites).

Federal and state laws mandate data used to determine the feasibility and safety of any project, particularly one that poses significant adverse impacts, should accurately reflect the composition and character of the surrounding community. However, the data submitted by the applicant does not.

The portion of Union Hill which was omitted from the application submitted to the Federal Energy Regulatory Commission (FERC), is predominately African-American and consists of approximately 99 unreported homes, and several historic sites; including 2 historic black churches and cemeteries. Established by freed enslaved families after the Civil War, the Union Hill/Woods Corner Rural Historic District, was listed as a "Most Endangered Historic Place in Virginia" by Preservation VA in 2016.

Since the applicant did not accurately list the actual population living within close proximity to the compressor station site, the undercount allows the applicant to avoid adhering to federal and state mandated regulations used to identify and prevent disproportionate adverse impacts to minority and elderly populations. In addition, the low population count allows the applicant to implement substandard

safety protocols, such as to: use fewer heavy pipes, place longer shutoff valve distances, operate the station 24 hours a day/7 days a week unmanned, and not be required to use odorant to help alert the surrounding community in case of a leak, to name a few.

2 – We ask that the applicant be required to use a more robust and reliable air modeling and air quality monitoring program.

According to “Fumes Across the Fence-Line, a report jointly written by NAACP and CleanAIR Task Force, “the racial disparities among communities impacted by environmental pollution in the United States is stark. African Americans are exposed to 38% more polluted air than Caucasian Americans, and they are 75% more likely to live in fence-line communities than the average American. The report defines fence-line communities as “communities that are next to a company, industrial, or service facility and are directly affected in the facility’s operation (e.g. noise, odor, traffic, and chemical emissions”.

The proposed compressor station, the largest to be built in the Commonwealth of Virginia, will be constructed within a few hundred feet of existing homes (unreported dwellings as discussed in #1), and is expected to pump hazardous air pollutants and particulate into the environment. Leakages are known to be an unpreventable part of the normal operations of any compressor station. However, due to the inaccurate population count, the applicant does not need to have, nor do they intend to implement, stringent protocols to monitor/combat potential leaks that could cause air quality degradation or pose immediate risk to the community and environment as would have been required with higher population counts.

The applicant must be required to use industry-proven technology that considers real-life characteristics (i.e. surrounding land uses, local topography, seasonal climatic changes, wind patterns etc.) to develop a robust baseline as well as, procedures to conduct consistent air quality testing.

3 - Completion of a Quantitative Risk Assessment and Comprehensive Health Impact Assessment to properly assess, evaluate and mitigate potential negative effects.

In May 2018, the VSC NAACP submitted comments to the DEQ to halt all construction activities associated with the pipeline until a comprehensive stream-by-stream analysis is conducted, and that a study of the cumulative effect the pipeline will have on our surface water bodies is performed. We continue to be committed to encouraging all efforts to include cumulative analysis for this project. Studies and personal interviews conducted by grassroots efforts revealed the Union Hill community’s residents experience existing medical conditions including asthma, and other illnesses that will be worsen by increased exposure to air pollutants and particulate matters emitted from the station.

Again, we implore you to deny the air permit for the compressor station in Buckingham County.

Thank you for your consideration.

Sincerely,

Kevin Chandler

Rev. Kevin Chandler
VSC NAACP
President

Karen Campblin

Karen Campblin
VSC NAACP
Environmental Climate Justice Committee,
Chair