



Virginia Clinicians for Climate Action

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

September 11, 2018

Dear Members of the Air Pollution Control Board:

Representing the Virginia Clinicians for Climate Action (VCCA) we urge you to consider the health impacts of the proposed Atlantic Coast Pipeline Buckingham Compressor Station.

As physicians we know that our patients cannot be healthy if the air, water and soil are contaminated with pollutants. The draft permit and air modeling report for the compressor station do not assess or comprehensively consider health impacts and fail to adequately protect vulnerable at risk populations who reside near the proposed compressor.

The majority of the population surrounding the proposed compressor station is African American and includes both the elderly and children who are more vulnerable to air pollutants, especially particulate matter. We do not know the specific health status of nearby residents, as a comprehensive health impact assessment is not part of the regulatory process.

The American Lung Association does report that of the 17,048 residents of Buckingham County there are 255 children and 1,190 adults with asthma, 896 people with COPD, and 1,237 patients with cardiovascular disease. Along with the greater than 3,000 children and 3,000 adults over 65, these populations are all at risk from air pollutants.

The air modeling report conducted concludes that health will be protected because the levels of the modeled pollutants do not exceed the National Ambient Air Quality Standards (NAAQS). When considering health impacts, applying regional air quality standards will not be sensitive enough to assess the risks to people who reside within a mile or two of the compressor station, as the closest air monitoring station is approximately 62 miles away.

In the context of drilling, concern has been raised about whether the ambient air standards are sufficient to address risks due to the episodic release of pollutants.¹ Ambient air monitoring does not capture the intensity, duration, and frequency of exposures. This concern also applies to people in close proximity to compressor stations where shutdowns, blow downs, fugitive emissions are also episodic. Sensitive and vulnerable populations, like the residents of Union Hill are at increased risk to these exposures and should be protected.

The permit will allow 190.3 tons of air pollutant emissions in this vulnerable neighborhood. Other hazardous air pollutants and toxics will also be emitted from the compressor station, but are not described in the permit, as they do not rise to the level regulated in Virginia statutes.

We know that exposure to air pollution leads to excess asthma events, excess respiratory and cardiovascular disease and diminished quality of life.

We ask you to consider the health and safety of the residents of Union Hill and take appropriate action to protect their health by denying the permit or including requirements for fence line monitoring to insure that the air quality standards are achieved on an hourly basis year round.

You have a unique opportunity to prevent harm that will inevitably be caused by this compressor station. We request that you take action to eliminate, reduce or mitigate the risks from emissions at the Buckingham Compressor Station. The safety and health of nearby residents should guide your consideration of the air permit.

Thank you for your consideration,

Virginia Clinicians for Climate Action

¹ American Lung Association, State of the Air 2018. <http://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/states/virginia/buckingham.html>

Accessed 8/23/2018

² Brown, D et. al. Understanding exposure from natural gas drilling puts current air standards to the test. Rev Environ Health. 2014;29(4): 277-92.

¹ Brown, David, et.al. Understanding exposure from natural gas drilling puts current air standards to the test. Reviews on Environmental Health 2014; 29 (4): 272-92.