



February 20th, 2006

Mr. Lawrence Mansueti
Permitting, Siting, and Analysis Division
Office of Electricity Delivery and Energy Reliability
Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0119

Dear Mr. Mansueti,

This letter is in response to the Department of Energy Emergency Order to Resume Limited Operation at the Potomac River Generating Station, Alexandria, VA, in Response to Electricity Reliability Concerns in Washington, DC.

For over 50 years, and as indicated by Mirant's own recent modeling analysis, citizens in the city of Alexandria have been exposed to significant health risks, including concentrations of nitrogen oxides (NO_x), sulfur dioxide (SO₂), and particulate matter with aerodynamic diameter less than 10 microns (PM₁₀) in exceedance of National Ambient Air Quality Standards (NAAQS). In addition, the city of Alexandria's modeling study showed exceedances not only for these three criteria pollutants, but also for particulate matter with aerodynamic diameter less than 2.5 microns (PM_{2.5}). Moreover, modeling analysis by Dr. Jonathan Levy, from the Harvard School of Public Health showed that the District of Columbia is also impacted by fine particulate matter pollution from this facility.

We are very disappointed with your decision to allow limited operation of the Mirant Plant. We are rather troubled that, despite the overwhelming scientific evidence of the risks posed by this facility, electrical reliability appears to be taking precedence over public health.

Mirant should provide evidence that proposed Option A for the facility will not lead to NAAQS exceedances of PM_{2.5}, particularly in light of the recent installation of Trona technology, which can lead to potential increases of this pollutant. This process must include in-stack testing of PM_{2.5}. Moreover, in order to ascertain that proposed Option A will not lead to continued health risks for the citizens of Alexandria, continuous monitors,

for at least SO₂ should be placed at the Marina Towers apartment complex, where the most serious downwash effects are occurring. In addition, since the region is in attainment of the 24-hour PM_{2.5} NAAQS Mirant should prove that it will not cause an exceedance of this standard through ambient air monitoring of PM_{2.5}.

Because the Clean Air Act requires that sources prove that they are not consuming the Prevention of Significant Deterioration (PSD) increment for that pollutant. Mirant should also be required to verify that they are not exceeding the PM_{2.5} PSD increment.

The likely decrease in the efficiency of the heat exchangers that will result from the installation of Trona Technology will lead to an increase in coal consumption, and therefore pollutant emissions at the power plant. Therefore, this should be taken into consideration when assessing the health risks from the facility and when estimating pollutant concentrations in the vicinity of the power plant.

To help mitigate the continuing health risks posed to Alexandria and District of Columbia residents by the Mirant power plant, we also request that the Department of Energy develop a plan for reducing electrical demand in the District of Columbia, particularly during periods of scheduled maintenance of one or two of the transmission lines, as it seems likely that operation of three or more units at the power plant would lead to NAAQS exceedances. To ensure continued public safety, we also request that the Department of Energy expedite the upgrade of the two transmission lines so that this polluting facility can be permanently retired.

Finally, we wish to request a third party review of Mirant's proposed plan, followed by a period of public comment.

Sincerely,

Bruce Parker
Vice Chair
Mount Vernon Group
Sierra Club, Virginia Chapter

Mike Town
Executive Director,
Sierra Club, Virginia Chapter