



January 7th, 2007

Anthony J. Como
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.Como:

This letter is in response to the Department of Energy Special Environmental Analysis for Actions Taken under the U.S Department of Energy Emergency Orders Regarding Operation of the Potomac River Generating Station in Alexandria, Virginia.

Air Quality impacts

This study neglects to report the spatial distribution of modeled pollutant concentrations. The only information provided in this regard is that maximum modeled pollutant concentrations occur in Alexandria. Were there modeled NAAQS exceedances elsewhere, such as in the District of Columbia ?

According to this SEA there are PM_{2.5} NAAQS exceedances under the current operating scenario. No alternatives are suggested for decreasing emissions, but at a minimum, daily predictive modeling should include PM_{2.5} since according to this study the Plant contributes a large fraction of both the annual and 24 hour maximum modeled concentrations.

There is a discrepancy between previously reported mercury emissions from the Plant and those reported in this study. The 1999 TRI for the Plant is 66 lb/year, but this study modeled 116 lb/year for both the pre-shutdown and Temporary Extension Order scenarios. We request an explanation for this large discrepancy or for reasons for allowing a 75% increase in mercury emissions under the Temporary Extension Order.

Alternatives for Future Decision Making

We believe that, as stated in page 111, under line outage conditions and until the two new 230 KV lines are in place, residents living in areas with modeled PM_{2.5} NAAQS exceedances (including the District of Columbia and Prince George's County) should be

given the option of relocation, with expensed paid for by Mirant, until the end of the scheduled line outage period.

Given the modeled 24-hour PM_{2.5} exceedances by DOE as part of this study, and previously by the City of Alexandria under non-outage conditions, the Plant should be required to cease operations permanently after the two 230 KV lines have been completed since it would no longer be required for electrical reliability and there are plenty other alternatives for electricity generation without continued health risks to residents of Alexandria and the District of Columbia.

Constructing additional lines from other power plants in the DC area would lead to reduced emissions in Alexandria at the expense of increased emissions in the District of Columbia, which is already in non-attainment. We agree this should not be considered a mitigation option.

Sincerely,

Mike Town
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