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### FACSIMILE COVER SHEET

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*You should receive a total of 5 page(s). If you do not receive all the pages, please call (704) 672-2805.*

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**TO:** James J. Golden

**FROM:** Mark A. Casper

**DATE:** 3 June, 2008

*Message:*

Mr. Golden –

Please find a fax copy of the letter that will be sent to you today regarding your request of May 15, 2008. I wanted to get the response to you as quick as possible. The original will be sent by US Mail today.

Regards,

A handwritten signature in black ink, appearing to be "Mark A. Casper", written in a cursive style.

698-4510  
FAX NO.: 804-698-4500



Cogentrix Energy, LLC  
9405 Arrowpoint Boulevard  
Charlotte, NC 28273-8110  
704-525-3800  
Fax 704-529-5313

June 3, 2008

Mr. James J. Golden  
Deputy Director for Program Development  
Virginia Department of Environmental Quality  
Post Office Box 10009  
Richmond, Virginia 23240

Subject: Virginia State Air Pollution Control Board  
Information Request

Dear Mr. Golden:

In response to your letter of May 15, 2008 and received May 20, 2008 requesting information on the Cogentrix plants located in Virginia, below is the information for James River Cogeneration Company ("JRCC"), Cogentrix - Virginia Leasing Corporation ("CVLC") and Spruance Genco, LLC Plants I and II ("Spruance"). Please note that even though Plants I and II of Spruance are one plant for air quality permitting purposes, each plant has separate coal contracts, thus the separation in this response. In addition, data of coal burned at JRCC are based on units (3 boilers per unit) while CVLC and Spruance are by boiler. This is due to the differences in tracking coal burned as required in each individual plant air quality permit.

To comment on the request by Mr. Hullihen Moore of the SAPCB, much of this request does not apply to the subject plants. Mr. Moore's questions 10 through 13 do not apply. The Cogentrix Plants contract bituminous coal that contains specifications on the maximum sulfur content allowed to meet air quality permit requirements. Coal contracts do not contemplate the categories requested nor does the price change based on the coal BTU or sulfur content. The supplier must meet the requirements of the coal purchase contract.

In addition, the plants receive standard coal analyses per shipment which do not include mercury content or the content of the other hazardous air pollutants. The coal received is run-of-mine and thus there is no treatment of the coal such as washing, cleaning and/or testing.

Unlike a public utility, EUGs are under no obligation to provide coal cost information. Indeed, the plants have an obligation under the confidentiality clause of the coal purchase agreements not to provide such information. We will not be able to provide the cost of the coal listed in the attachments.

As a result of the above considerations, the requests in your letter are given as opposed to the request by Mr. Moore.

- The amount of coal burned in each unit/boiler of each plant is given in Attachment 1.
- The ranges of sulfur content, heat content and ash content for each year and unit/boiler are given in Attachment 1. Please note that the high ash content range for CVLC in 2005 is the result of VaDEQ allowed testing of the under throw feeders using a higher ash coal. The tests involved two shipments of coal in December, 2005. There are no data for mercury or other hazardous air pollutants.
- The coal received is not treated to meet the above specifications.
- Coal prices cannot be provided.
- Mine location information is given in Attachment 2.

I believe that the attachments give you the available information as requested. If you have any questions or further comments on the provided information, please call me at 704.672.2805.

Sincerely,



Mark A. Casper  
Vice President  
Environment, Health & Safety

C: Lauren Billheimer  
Jef Freeman  
John Gasbarro  
Mike Williams  
Gary Hughes  
Frank Harrison

2005

Attachment 1  
Cogentrix Energy, LLC - EGU Coal Data

Facility	Boiler	Tons Coal Burned	%Ash Avg.	%Ash Range	%Sulfur Avg.	%Sulfur Range	Btu Avg.	Btu Range
James River Cogeneration Company (JRCC)	U1	203,475	8.46	4.89-9.93	0.90	0.71-0.95	13,411	12750-13568
	U2	203,305	8.46	4.89-9.96	0.90	0.71-0.95	13,411	12750-13568
	1A	62,546	8.09	3.89-11.68	0.73	0.52-0.95	12,986	12294-13922
	1B	66,982	8.09	3.89-11.68	0.73	0.52-0.95	12,986	12294-13922
Cogentrix - Virginia Leasing Corporation (CVLC)	1C	64,877	8.08	3.89-11.68	0.73	0.52-0.95	12,986	12294-13922
	2A	67,789	8.09	3.89-11.68	0.73	0.52-0.95	12,986	12294-13922
	2B	66,690	8.09	3.89-11.68	0.73	0.52-0.95	12,986	12294-13922
	2C	66,213	8.09	3.89-11.68	0.73	0.52-0.95	12,986	12294-13922
Spruance Genco, LLC (I)	1A	212,106	8.48	6.95-10.12	0.86	0.68-0.93	12,961	12550-13239
	1B	212,822	8.48	6.95-10.12	0.86	0.68-0.93	12,961	12550-13239
	2A	226,903	8.48	6.95-10.12	0.86	0.68-0.93	12,961	12550-13239
	2B	219,803	8.48	6.95-10.12	0.86	0.68-0.93	12,961	12550-13239
Spruance Genco, LLC (II)	3A	212,106	8.48	7.03-9.49	0.86	0.78-1.05	12,961	12772-13239
	3B	212,822	8.48	7.03-9.49	0.86	0.78-1.05	12,961	12772-13239
	4A	226,903	8.48	7.03-9.49	0.86	0.78-1.05	12,961	12772-13239
	4B	219,803	8.48	7.03-9.49	0.86	0.78-1.05	12,961	12772-13239

2006

Facility	Boiler	Tons Coal Burned	%Ash Avg.	%Ash Range	%Sulfur Avg.	%Sulfur Range	Btu Avg.	Btu Range	
James River Cogeneration Company (JRCC)	U1	189,335	9.03	5.99-10.75	0.91	0.74-0.95	13,250	12586-13907	
	U2	192,688	9.03	5.99-10.75	0.91	0.74-0.95	13,250	12586-13907	
Cogentrix - Virginia Leasing Corporation (CVLC)	1A	64,982	8.39	6.24-9.95	0.84	0.66-0.95	12,914	12522-13909	
	1B	62,551	8.39	6.24-9.95	0.84	0.65-0.95	12,914	12522-13909	
	1C	67,714	8.39	6.24-9.95	0.84	0.65-0.95	12,914	12522-13909	
	2A	65,548	8.39	6.24-9.95	0.84	0.65-0.95	12,914	12522-13909	
	2B	62,623	8.39	6.24-9.95	0.84	0.65-0.95	12,914	12522-13909	
	2C	65,222	8.39	6.24-9.95	0.84	0.65-0.95	12,914	12522-13909	
	Spruance Genco, LLC (I)	1A	177,182	8.80	7.07-10.46	0.83	0.70-1.03	12,961	12500-13217
		1B	169,827	8.80	7.07-10.46	0.83	0.70-1.03	12,961	12500-13217
		2A	184,525	8.80	7.07-10.46	0.83	0.70-1.03	12,961	12500-13217
	Spruance Genco, LLC (II)	2B	181,437	8.80	7.07-10.46	0.83	0.70-1.03	12,961	12500-13217
		3A	177,182	8.80	4.70-11.08	0.83	0.59-1.19	12,961	12605-13731
		3B	169,827	8.80	4.70-11.08	0.83	0.59-1.19	12,961	12605-13731
4A		184,525	8.80	4.70-11.08	0.83	0.59-1.19	12,961	12605-13731	
Spruance Genco, LLC (III)	4B	181,437	8.80	4.70-11.08	0.83	0.59-1.19	12,961	12605-13731	

2007

Attachment 1 (Cont.)

Facility	Boiler	Tons Coal Burned	%Ash Avg.	%Ash Range	%Sulfur Avg.	%Sulfur Range	Btu Avg.	Btu Range
James River Cogeneration Company (JRCC)	U1	192,809	9.20	7.24-10.51	0.92	0.64-0.95	13,049	12570-13563
	U2	206,548	9.20	7.24-10.51	0.92	0.64-0.95	13,049	12570-13563
Cogentrix - Virginia Leasing Corporation (CVLC)	1A	61,407	8.62	6.19-9.72	0.78	0.55-0.95	12,959	12532-13909
	1B	58,999	8.62	6.19-9.72	0.78	0.55-0.95	12,959	12532-13909
	1C	59,177	8.62	6.19-9.72	0.78	0.55-0.95	12,959	12532-13909
	2A	61,547	8.62	6.19-9.72	0.78	0.55-0.95	12,959	12532-13909
	2B	58,186	8.62	6.19-9.72	0.78	0.55-0.95	12,959	12532-13909
	2C	54,783	8.62	6.19-9.72	0.78	0.55-0.95	12,959	12532-13909
	1A	204,078	8.80	7.82-10.83	0.83	0.65-1.00	12,899	12512-13205
	1B	205,669	8.80	7.82-10.83	0.83	0.65-1.00	12,899	12512-13205
Spurace Genco, LLC (I)	2A	207,351	8.80	7.82-10.83	0.83	0.65-1.00	12,899	12512-13205
	2B	202,657	8.80	7.82-10.83	0.83	0.65-1.00	12,899	12512-13205
	3A	204,078	8.80	7.71-11.01	0.83	0.68-1.07	12,899	12587-13722
	3B	205,668	8.80	7.71-11.01	0.83	0.68-1.07	12,899	12587-13722
Spurace Genco, LLC (II)	4A	207,351	8.80	7.71-11.01	0.83	0.68-1.07	12,899	12587-13722
	4B	202,657	8.80	7.71-11.01	0.83	0.68-1.07	12,899	12587-13722

Source: Annual Emissions Inventories Submitted to VDEQ and Coal Shipment Reports

Simple Average 2005-2007 (Avg. of Plants for all 3 years)	% Ash Avg.	% Sulfur Avg.	Btu Avg.
	8.68	0.84	13,184.79
Weighted Average 2005-2007 (Avg. of Each Boiler, Weighted by Tons Coal, for all 3 years)	% Ash Avg.	% Sulfur Avg.	Btu Avg.
	8.65	0.84	13,043.00

Annual Emissions Inventories Submitted to VDEQ and Coal Shipment Reports.

Attachment 2

James River Cogeneration Company (JRCC) - Hopewell - Source and Total Coal (Tons) Burned 2005-2007

	Total Coal (Tons)	Origin	Contract Sulfur Limit
2005	407,000	Virginia (Wise County) - 100%	0.95%
2006	396,000	Virginia (Wise County) - 100%	0.95%
2007	399,000	Virginia (Wise County) - 92% West VA - 8%	0.95%

Cogentrix Virginia Leasing Corporation (CVLC) Portsmouth - Source and Total Coal (Tons) Burned 2005-2007

	Total Coal (Tons)	Origin	Contract Sulfur Limit
2005	889,000	Kentucky - 74% West VA - 26%	0.95%
2006	395,000	Kentucky - 74% West VA - 26%	0.95%
2007	354,000	Kentucky - 85% West VA - 15%	0.95%

Spruance Genco, LLC - Source and Total Coal (Tons) Burned 2005-2007

	Total Coal (Tons)	Origin	Contract Sulfur Limit
2005	889,000	Kentucky - 100%	1.10%
2006	748,000	Kentucky - 100%	1.10%
2007	828,000	Kentucky - 90% West VA - 10%	1.10%