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From: Hullahen Moore <hullie@comcast.net>  
To: Dowd,Michael <mgdowd@deq.virginia.gov>  
Sent: Thu May 08 13:54:00 2008  
Subject: Responses from Vepco

As we discussed earlier today, I have only been able to do a cursory review of the Vepco responses. Since I will not be able to do more for more than a week, I wanted to advise you of the data that are missing, some things that are not clear to me, and places where Vepco simply has not answered. Please act on this now; its been well over three weeks and we need the data so we can do our work.

General:

Are the data, except as shown on Attachment 1, Vepco only data and averages? For example, "all EGU" averages appear to be given at end of Attachment 1, and items 6, 7, and 9. I like the idea of having not only station averages and all EGU averages, but also averages for these data by company or EGU. I think that's what Vepco did. Please confirm and ask others to do the same. Then you folks can do the overall average.

I need to make certain that we have overall averages at the EGU and statewide levels for these various categories that are weighted by ton. 10 tons at 1% and 20 at 2%; weighted avg is 1.667%. In addition to all other data, make sure we have that for at least each EGU and all coal burned. I think Vepco has done that for itself; please confirm and ask others to do the same.

Item 1, Attachment 1.

Data from Cogentrix on down show Mercury content in lb/ton rather than ppm. Please obtain or convert so we have ppm for all units.

HCl is stated differently also. I would think it best to have one way and use for all plants. Please see if this can be done.

Items 6, 7, and 9.

Please confirm that these are Vepco only data that are averaged on a ton weighted basis. If not provide detail of what is averaged and how; also provide a ton weighted average for Vepco for each year and over the three years for items covered in each item.

Item 8.

Vepco answer is not responsive. The question is the same as items 7 and 9, except its for Mercury concentrations rather than Sulfur and Btus. Attachment 1 of item 1 shows mercury concentrations for each station and the company knows the coal involved; it's the same coal used to provide the data in 7 and 9.

Items 15 and 16.

For item 15, let me supplement the question. Please provide how much coal at each station for each of the years was: just screened by Vepco or any other entity; was washed by Vepco or any other entity and if there are various levels of washing, describe each level and list tons washed at each level; was treated by Vepco or any other entity; had any other kind of cleaning or processing and describe the processing. In this item I'm trying to understand what happens to the coal before it is burned and how much coal at each station and overall has each kind of processing. If coal is subjected to several layers of processing explain and show tons etc. Please work to obtain the data so we can understand what is done and what and how much coal its done to.

Item 16 was the flip side of 15; add the two and you get the total burned. item 16 focused on the coal that was processed and, according to Vepco that is all of it. The second sentence of question V 2 ask specifically:

Describe the change or difference that is achieved by washing, cleaning, treating, or preparing with respect to Btu and ash content and

Each substance controlled or limited by the proposed permits for each Virginia EGU.

After item 15, there should be a list of various screenings, washings, cleanings, and treatments that Vepco uses for its coals and how much coal at each station and overall is subjected to the various levels of processing, cleaning, etc.. In item 16, we will learn how much of a difference each such process makes separately and collectively. In other words, we can understand what is done and the result. For example, if coal a particular plant is screened and washed, we may find that screening increases Btu content by x% and decreases sulfur by y%. We may also learn that subsequent washing decreases sulfur by an additional z% and decreases Mercury by a%, etc. We can see how various coals for various stations are impacted by different levels of washing, cleaning, treating, etc.

Let me know if you have any questions. Thank you for your help.