COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 10009, Richmond, Virginia 23240
Fax (804) 698-4500 TDD (804) 698-4021
www.deq.virginia.gov

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Robert G. Burnley
Director

(804) 698-4000
1-800-592-5482

October 27, 2005

Ms. Lisa Johnson, President
Mirant Potomac River, LLC
8711 Westphalia Road
Upper Marlboro, MD 20774

Dear Ms. Johnson:

This letter is in response to Mirant's proposal dated October 14, 2005, for the Trona injection testing on Unit 1 of the Potomac River Power Generating Station (PRPGS).

The proposal adequately describes the storage, handling and injection system associated with Trona. For the purposes of this trial, it appears that PRPGS has taken reasonable precautions to prevent fugitive Trona emissions from becoming airborne.

However, the purpose of this trial is to determine the effectiveness of Trona for SO2 reduction and to determine the impact of PRPGS' emissions on National Ambient Air Quality Standards (NAAQS). Although the concept of SO2 reductions with Trona shows promise, there is a potential for increased particulate emissions as well.

DEQ must ensure that all emission testing and data collection for future modeling accurately reflect emissions from the PRPGS facility. Therefore, all testing must be performed in accordance with approved EPA reference methods and observed by DEQ staff. For this reason the report of stack particulate emissions testing conducted in late September 2005, can not be accepted as a baseline for particulate emissions. Moreover, total filterable particulate (PM) is no longer a NAAQS standard.

To demonstrate a particulate baseline and any emissions increase from Trona injection, PRPGS must conduct PM10 particulate emission testing using either EPA Reference Methods 201 or 201a. This testing must be done in conjunction with condensable particulate emissions testing using EPA Reference Method 202. One set of tests shall be performed without Trona and a second set of tests shall be performed once the maximum SO2 reduction rate has been established.

With regards to SO2 reductions, DEQ has concerns with the relative accuracy of the SO2 CEMs. Since EPA retains authority of the Title IV Acid Rain Program, audit results for SO2 CEMs are reported directly to EPA. DEQ has no data to document whether the SO2 CEM is performing within QA/QC specifications established in 40 CFR 75. DEQ, therefore, requires PRPGS to demonstrate the relative accuracy of the SO2 CEM by either performing an EPA Reference Method 6c test or performing the Relative Accuracy Test Audit (RATA). This testing may be performed in conjunction with the Trona testing.

To reduce the possibility of errors during stack emissions testing, DEQ has developed a Stack Test Protocol Form. This form requires information related to stack dimensions, sampling times, parametric monitoring and the identification of any deviations from approved EPA test methods. A copy of this form is attached to this letter or, if you prefer, an electronic version can be found on the DEQ website at http://www.deq.virginia.gov/air/justforms.html. DEQ will not authorize any testing until a completed version of the protocol is returned and approved by staff.

DEQ remains committed to protecting the health and welfare of the citizens of the Commonwealth. DEQ believes that the requirements outlined in this letter must be met to ensure this commitment is met. Should you have any questions concerning this matter, please call me at (804) 698-4284.

Sincerely,

Michael G. Dowd
Air Enforcement Manager

Attachment

CC: Jeff Steers
Amy Owens
Frank Adams
Terry Darton
Ken McBee
Deborah Jennings