

r waud Comments on DEQ's Proposed permit for Mirant PRGS.txt  
From: Roger Waud [waudr@comcast.net]  
Sent: Wednesday, November 14, 2007 8:17 PM  
To: Darton, Terry  
Subject: Comments on DEQ's Proposed permit for Mirant PRGS

To: Mr. Terry Darton  
Air Permit Manager  
VDEQ

From: Roger Waud  
Alexandria Citizen

Dear Mr. Darton,

Here I submit my comments on the DEQ's proposed permit for Mirant's PRGS, the subject of DEQ's hearing in Alexandria this November 19th.

1. The permit as written allows PM<sub>2.5</sub> exceedance of NAQS and doesn't sufficiently protect public health. The permit uses PM<sub>10</sub> as a surrogate for PM<sub>2.5</sub>. There is no reason not to include a PM<sub>2.5</sub> limit instead of using PM<sub>10</sub>. In Maryland, just across the river from the PRGS, power plants are required to use a PM<sub>2.5</sub> limit that meets NAQS. Why should we be less protective of public health than they are, particularly given that the PRGS is located smack in the middle of a dense residential area? PRGS is one of the very few plants in the United States so situated.

2. There is a state limit on PM<sub>2.5</sub> but it is not in SIP. Why not?

3. PM<sub>2.5</sub> studies have repeatedly said that annual limits should be set lower.

3. ESP's are not good at reducing PM<sub>2.5</sub>. Bag houses do a better job. The waste facility on Eisenhower Avenue here in Alexandria demonstrates this. The permit should require the PRGS to install bag houses.

4. The control technology the PRGS already has is not being used to the fullest extent possible. The permit should require that the plant use its existing controls to control emissions better.

5. With the ongoing and proposed changes at PRGS why has NSR not been triggered? DEQ said a year ago that they would require an NSR, but it hasn't happened. Why not?

6. It is not scientifically proven that Trona reduces PM emissions. Moreover the health impacts of Trona are not known. I live next to the plant and I regularly experience inexplicable coughing and sneezing since the plant started using trona, and I have never had any allergies. The permit should not allow the use of trona without an NSR analysis, both of its effectiveness at reducing PM emissions and its public health implications.

7. The permit should require the use of CEMS. CEMS have been used in Europe for 20 years. Currently CEMS's are used in 6 locations in the U. S. and there are places where they are required by permit. Especially because of the location of the PRGS in a dense residential area, the permit should require the plant to use CEMS. There's no excuse for the permit not to require use of CEMS.

8. I agree with the City of Alexandria's comments on and critique of this permit. We need a comprehensive permit -- this permit doesn't do it.

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Sincerely,

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