

From: DELPepper
Sent: Wednesday, March 05, 2008 3:11 PM
To: Joan Rohlf
Cc: William.Skrabak@alexandriava.gov
Subject: Amendments to the PM2.5 SIP

On behalf of the City of Alexandria I plan to propose a couple of amendments to the proposed SIP for PM2.5. I have provided a brief summary of the changes and the reasons they are needed.

The PM2.5 SIP, as drafted and advertised, has a provision requiring Mirant to conduct a PM2.5 analysis for its power plant in the City of Alexandria. As drafted, there is no deadline or assurance as to when this analysis will be completed and submitted to VDEQ. The City's amendment seeks to provide a deadline of 8 months for completion of such an analysis and make it available to the public.

Virginia, Maryland and DC have different opacity (surrogate for particulate pollution) standards for emissions from point sources in the Metropolitan Washington Non-attainment Area for PM2.5. Among the three, Virginia's opacity standard is the most lax, and is antiquated (currently 20%). The City's amendment seeks to tighten Virginia's opacity standard to 10% within Northern Virginia making it comparable to Maryland and DC.

The actual text of the proposed amendments is attached. If you have any questions, please feel free to contact me, 703-751-0770.

Sincerely,
Del Pepper

**PROPOSED AMENDMENT TO
DRAFT PM_{2.5} SIP**

The City of Alexandria has consistently proposed a local area PM_{2.5} analysis to evaluate emissions from the Mirant Potomac River Generating Station (PRGS). This is consistent with the goal of the SIP to improve the health of all residents in the region and reduce mortality for people at risk for cardiovascular disease. In light of the modeled and possibly monitoring evidence of the PRGS as a major primary PM_{2.5} source and contributor to non-attainment of the NAAQS and the resultant need to identify PM_{2.5} concentration gradients from such site, Alexandria proposes the following amendments to the draft State Implementation Plan (SIP) for Fine Particle (PM_{2.5}) Standard for the Washington, DC – MD – VA Non-attainment Area:

1. To the second paragraph, third sentence of section 9.4.3 (Local Area Analysis): Based on a schedule and protocol to be established by VDEQ after US EPA promulgates final rules for PM_{2.5} analysis, or US EPA promulgates revised implementation guidance or policy for PM_{2.5} analysis, or VDEQ establishes a more appropriate implementation methodology for PM_{2.5}, Mirant Potomac River Power Station shall conduct **and submit to VDEQ** an ambient air quality analysis for the emissions of PM_{2.5} from the facility **as expeditiously as possible, but no later than eight months from the date of SIP approval by MWAQC. Upon receipt VDEQ shall make this analysis available to the public.**

2. To the end of the section 5.1.2, Visibility Standards, Control Strategy, Virginia: **Consistent with the reasonably available control measures set out in US EPA's Clean Air Fine Particle Implementation Rule and to have a similarly stringent opacity standard throughout the Washington, DC – MD – VA non-attainment area, VDEQ shall establish an opacity standard for fuel combustion sources within the northern Virginia non-attainment area that prohibits visible emissions from fuel burning equipment which exhibit greater than 10% opacity, except for periods of start-up, load changing, soot blowing or adjustments or occasional cleaning of control equipment, when emissions shall not be greater than 40% opacity for more than 6 consecutive minutes in any 60-minute period.**

[New language in bold]