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Mr. Samuel W. Bodman
Secretary of Energy

Via

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RE: DOE/SEA-04, Special Environmental Analysis: For Actions Taken Under U.S. Department of Energy Emergency Orders Regarding Operation of the Potomac River Generating Station in Alexandria, Virginia, November 2006

Dear Mr. Bodman,

Thank you for the opportunity to comment on the above named document hereafter referred to as DOE/SEA-04.

It seems given the findings of DOE/SEA-04, that neither DOE nor EPA are aware that AERO Engineering, hired by the City of Alexandria, modeled the air quality surrounding the Potomac River Generating Station for pollutants emitted by the generating station, e.g. PM10, PM2.5, and SO2 in 2005/2006. This AERO report finds exceedances of the NAAQS standards for all these pollutants adjacent to the generating station in residential neighborhoods and over the Potomac River.

The findings are depicted with shadings that describe multiples of the NAAQS in micrograms per cubic meter on grid boundaries from the monitor near the PRGS. Looking at those diagrams:

For 24-hr PM2.5

800 meters to the north, 400 meters to the east, 700 meters to the south, and 300 meters to the west - **2 times the NAAQS**

400 meters to the north and west, 150 meters to the east, and 300 meters to the south - **3 times the NAAQS**

Less than 100 meters in all directions - **5 times the NAAQS**

For annual PM2.5

600 meters to the north, 100 meters to the east, 400 meters to the south, and 300 meters to the west - **2 times the NAAQS**

200 meters to the north and west, 150 meters to the east, and 300 meters to the south - **3 times the NAAQS**

Less than 100 meters in all directions - **5 times the NAAQS**

For 24-hr PM10

700 meters to the north, 300 meters to the east, 600 meters to the south, and 500 meters to the west - **1 times the NAAQS**

200 meters to the north and west, less than 100 meters to the east, and 400 meters to the south - **2 times the NAAQS**

Less than 100 meters to the north and east, 400 meters to the south, and 200 meters to the west - **3 times the NAAQS**

For annual PM10

200 meters to the north and west, less than 100 meters to the east, and 400 meters to the south - **1 times the NAAQS**

Less than 100 meters to the north and east, 300 meters to the south, and 200 meters to the west - **2 times the NAAQS**

For 3-hr SO2

Greater than 1000 meters north, south and west, and greater than 900 meters to the east - **2 times the NAAQS**

500 meters to the north, 200 meters to the east, 800 meters to the south, and 450 meters to the west - **3 times the NAAQS**

Less than 100 meters to the north, east and south, and 100 meters to the west - **5 times the NAAQS**

For 24-hr SO₂

Greater than 1000 meters to the north, south and west, and greater than 800 meters to the east - **2 times the NAAQS**

400 meters to the north and west, 200 meters to the east, and 300 meters to the south - **6 times the NAAQS**

200 meters to the north, south and west, and less than 100 to the east - **9 times the NAAQS**

For annual SO₂

Greater than 1000 meters to the north and south, 600 meters to the east and west - **1 times the NAAQS**

600 meters to the north, 200 meters to the east, 350 meters to the south and west - **2 times the NAAQS**

200 meters to the north, south, and west, and less than 100 meters to the east - **5 times the NAAQS.**

While it is unclear if the AERO Engineering modeling at the PRGS was done while the generating station was operating at full capacity or not, this modeling report must be considered for any decisions that the generating station operate at all.

What would the modeling of Hg (mercury) be for similar time periods? Annual releases of mercury at PRGS were 66 lbs. in 1999 per the EPA HG Inventory and 83 lbs. in 2003 per the EPA's TRI. The effects of mercury toxics are gruesome and should be considered in your decisions also.

The findings of DOE/SEA04 mention TRONA. Your document does not mention nor cite any empirical references to TRONA nor studies of the effects of TRONA on life or natural resources. Numerous persons have noted the development of "little coughs" that began with the introduction of TRONA by the generating station into their operations. Why are you assuming that the use of TRONA causes no changes in any of the emitted pollutants, harm to health, or a nuisance that causes people to cough?

During December of 2006 the PRGS did operate at full capacity due to a PEPCO repair. The Alexandria residents near the generating station were not notified. It

is said that this same level of operation at the generating station will happen again in February of 2007. Who will notify at risk or already ill residents about this threat to their health?

While certainly the necessary utility to our Nation's Capital is important, so too is the health and well being of Alexandria citizens and the Potomac River. The Potomac River Generating Station needs to be eliminated from the equation that yields that utility. Our Nation's Capitol should not receive utility that causes ill health and death.

I am very disappointed in DOE with your lack of truly applicable research into the Mirant generating station on the Potomac River in Alexandria. The continuing problems of PRGS does not warrant its continued operation, in spite of the cash flow provided to Mirant and Southern Corporation or any other buyer. CLOSE THE POTOMAC GENERATING STATION ASAP.

My sincere wishes that you can resolve this issue,

Julie Crenshaw Van Fleet

Member, Clean Air Mercury Rule Ad Hoc Committee to the Virginia Air Pollution Control Board, Virginia Department of Environmental Quality

Member, Air Quality Public Advisory Committee at the Metropolitan Washington Council of Governments 1993- present, Chairperson 2000-2005.

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