



March 22, 2006

Mr. Lawrence Mansueti
Permitting, Siting, and Analysis Division
Office of Electricity Delivery and Energy Reliability
Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0119

Re: Comments on Emergency Order to Resume Limited Operation at the Potomac River Generating Station, Alexandria, VA.

Dear Mr. Mansueti,

This letter is in response to the Department of Energy Emergency Order (“Emergency Order”) to Resume Limited Operation at the Potomac River Generating Station, Alexandria, VA, in response to electricity reliability concerns in Washington, DC. The Chesapeake Climate Action Network (CCAN) is the first regional, non-profit organization to work solely on decreasing the negative effects of global warming by promoting clean energy alternatives and ensuring proper regulation of coal-fired power plants in Maryland, DC and Virginia.

It is disconcerting that an agency charged with providing the American public with efficient and reliable sources of energy that are “environmentally sound”, has created a plan that would allow a 1950s, Truman Era, coal-fired power plant to resume and continue operation in a populated, residential area of northern Virginia. Citizens in Alexandria, VA and across the Beltway have spoken out against this plant for years. This agency has once again placed potential (not realized) electricity reliability issues over pressing public health concerns plaguing Alexandria citizens from noxious pollutants emanated from the Potomac River Generating Station.

According to the Environmental Protection Agency’s clean air markets monitoring data, in 2004, the Potomac River plant emitted over 12,000 tons of sulfur dioxide, 4,000 tons of nitrous oxide, and over 2 million tons of carbon dioxide into the atmosphere. It is averaged that the plant emits around 83 pounds of mercury into the atmosphere every year as well. These pollutants cause significant health risks to citizens in our region as well as contribute extensively to greenhouse gases in the atmosphere that lead to global warming. The effects of global warming are particularly harmful to the city of Alexandria because of increased flooding and sea level rise that could harm property and the economy of the area, not to speak of the human casualties associated with extreme weather events caused by global warming.

Additionally, for over 50 years, as indicated by the Mirant Corporation’s own modeling analysis, citizens in the city of Alexandria have been exposed to significant health risks from particulate matter with aerodynamic diameter of less than 10 microns (PM10) in exceedance of the National Ambient Air Quality Standards (NAAQS). The Potomac River plant is also exceeding pollution

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levels of particulate matter with a diameter of less than 2.5 microns (PM fine) which causes significant health effects such as acute asthma attacks and heart disease.

Option A outlined in the Department of Energy “Emergency Order” would provide the Mirant Corporation with an opportunity to power their units up slowly if they use the Trona Technology which is essentially a boric flush of the units in order to reduce sulfur dioxide to a degree. However, Trona technology leads to a decrease in the efficiency of the heat exchangers at the plant, essentially requiring the plant to burn MORE coal with potentially less emissions of one pollutant. This option is not a long term solution and will not reduce many pollutants emitted from the plant, including nitrous oxide, particulate matter, mercury and carbon dioxide.

Therefore, CCAN, in conjunction with other neighborhood, citizen and environmental groups who have submitted comments on this plan, would request the Department of Energy take a broader approach to usage and eventual phasing out of the Potomac River Plant. CCAN requests that the Department of Energy develop a plan for reducing electrical demand in the District of Columbia, particularly during periods of scheduled maintenance of one or two of the transmission lines, as it seems likely that operation of the three or more units at the power plant will lead to NAAQS exceedances in the future. To ensure continued public safety, we also request that the Department of Energy expedite the upgrade of the two transmission lines so that this polluting facility can be permanently retired. There is discussion about allowing usage of a generating substation facility in Maryland to deal with peak demand in the District of Columbia as opposed to continuing usage of the archaic power plant in Alexandria, VA. We support any efforts to reduce consumption in the District of Columbia and redistribute energy from other parts of the grid with the goal of phasing out and retiring the Potomac River Power Plant completely in a short time frame.

Thank you very much for the opportunity to comment.

Sincerely,

Diana Dascalu
Staff Attorney
Chesapeake Climate Action Network

Mike Tidwell
Executive Director
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