

Virginia Air Pollution Control Board

April 10, 2007

By

City of Alexandria



City of Alexandria

City Followed Board's Explicit Direction

- City engaged in the process with:
 - Good faith and open mind
 - Focused on bridge period
 - Consulted with VDEQ staff (Mike Dowd/Mike Kiss)
 - VDEQ agreed that City acted in good faith and was reasonable



The Process

- Three parties were directed to achieve consensus for the bridge period
- Three days of negotiations
- Mirant's positions were contingent on City's acceptance of credits for stack merger
- Mirant insisted on including issues beyond the bridging period
- VDEQ and Mirant acted bilaterally to develop new consent order without City's knowledge or participation



VDEQ New Proposed Consent Order

- Fails to follow Board's explicit directions
- Disguised "Option 3"
- Prolongs the bridging period from 3 months to 2+ years
- Does not protect public health (such as short term exposure (ATSDR))
- Implicitly approves baseline year 2002-2003
- Approves credits for stack merger
- Requires MES
- Fails to address PM_{2.5} concerns arising from increased use of trona
- Does not incorporate City's input
- Remains technically flawed



VDEQ New Proposed Consent Order

- Prolongs the bridging period from 3 months to 2+ years
 - Stack merger completed January 2008
 - One year of MES through January 2009
 - Evaluation of models (3-6 months)
 - Issuance of permit approx. July 2009

This is contrary to Board's specific directions
on the bridging document



Mirant's Proposed Stack Merge Project

Existing Five Stack Configuration	Post Stack-Merge Configuration
SO ₂ emissions = <u>3,178</u> tons (Based on 2006)	SO ₂ Limit = app. <u>8,350</u> tons (Based on new proposed CO)

How can VDEQ consider this as net emissions reduction?



Annual Emission Increases from Stack Merge Project

Emission Increases Resulting from Mirant's Requested Stack Merge Project (tons per year) and Potential Emission Reductions with New Source Review Control Technologies						
	Heat Input (MMBtu per Year)	CO ^d	SO ₂	NO _x	PM ₁₀ (direct) ^c	PM _{2.5} (direct) ^c
	Local and regional impact:	Asphyxiant at elevated levels.	Fine PM precursor	Fine PM and ozone precursor	Fine PM direct contributor	Fine PM direct contributor
No stack merge:	13,572,942. ^a	228. tons (app., as reported)	3,178. ^a	1,869. ^a	136.	122.
Post-stack merge:	27,864,294. ^e	6,000 to 30,000.	6,531. ^b	3,831. ^b	279.	251.
	Increase	<i>Requested data for full determination withheld.</i>	3,353.	1,962.	143.	129.
	NSR Threshold, tons ^f	100	40.	40.	15	10.
	Possible Technology Triggered w. NSR	Best Management Practices	Lime spray drier.	Urea-based SNCR.	Polishing baghouses (as described in Amended Consent Decree)	
	Potential Missed Emission Reduction if NSR Circumvented ^g	>50% of all CO	>85 to 90% of all SO₂	> 50% of all NO_x	Significant additional control beyond ESPs.	Significant additional control beyond ESPs.



CITY'S BASIS FOR PROPOSED EMISSION RATES

- 0.4 lb/MMBtu SO₂ emission rate, approx. 60-65% control
- Mike Dowd indicated that the range 0.35-0.4 lb/MMBtu was appropriate and reasonable
- It was based on methodology that reflected City's concessions
 - In consultation with VDEQ's staff (Mike Kiss)
 - NAAQS compliance for summer only will require < 0.3 lb/MMBtu



BASIS FOR CITY'S PROPOSED ORDER

- Limits the bridging period to Sep. 30, 2007
- Protects community from short term SO₂ exposure (Alarms for 800 ug/m³ SO₂ level on hourly basis)
- Characterize post-trona ash to better assess reported impacts on the community
- Access to CO and opacity data to evaluate inconsistencies in submittals by Mirant



Recommendation

- ALTERNATIVE 1

Order Mirant to operate in a NAAQS compliant manner such as in Appendix A (On the basis of 2004 consent order, allowing use of EBDs)



Recommendation

- ALTERNATIVE 2

Issue interim order consistent with the draft order proposed by the City



Thank you

Questions?



City of Alexandria