

## Update on Mirant Environmental Performance in 2004

February 10, 2005

### 1. Compliance with Current Emissions Standards

Standard	U#1 ---- 2004 Unit Performance ---- U#5					Emission Limit
Annual NOx Rate – lb/MBtu	0.40	0.37	0.36	0.38	0.38	0.45 lb/MBtu annual average
24 hr SO2 Rate – lb/MBtu	1.04	1.07	1.07	1.07	1.08	1.52 lb/MBtu 24 hr average
Opacity Compliance – Percent	99.96	99.97	99.95	99.94	99.99	> 95 % op. time in compliance
Total Particulate Rate – lb/MBtu	0.06	0.03	0.05	0.01	0.02	0.12 lb/MBtu per stack test

### 2. Compliance with Consent Decree Emissions Targets

2004 NOx Targets	Actual Emissions	Emission Limits
Potomac River Ozone Season Tons	1,654	1,750
Mirant System Ozone Season Tons	12,454	14,700
Mirant System Annual Tons	34,329	36,500

### 3. Progress on NOx Control Projects at Mirant Plants

- ◆ Low NOx Burners on all five units at Potomac River – completed December 2004
- ◆ Separate Over-Fired Air (SOFA) on Potomac River units #3, 4, & 5
- ◆ Chalk Point Selective Auto-Catalytic Reduction (SACR)
- ◆ Morgantown Selective Catalytic Reduction (SCR)

### 4. Progress on Dust Control Projects

- ◆ **Truck Washer** – Equipment in-service since June 2004 on a trial basis. Purchase and permanent hookup is underway.
- ◆ **Coal Stackout Conveyor Dust Suppression** – Complete. Permanent system installed.
- ◆ **Coal Pile Wind Erosion Fencing** – Installation is 60-75% complete. 25% of fence material remains to be installed and screening material will be installed when fencing is complete.
- ◆ **Ash Silo Vent Secondary Filtration** – Bidding Complete. Clarifying bid from low bidder. Installation is planned for July/August 2005.
- ◆ **Ash Loader Upgrade** – Installation planned for late Summer/Fall 2005
- ◆ **Ash Loading System Dust Suppression** – Bids are currently being solicited. Prebid meeting scheduled for July/Aug 05. Scheduled job completion 4<sup>th</sup> quarter 2005
- ◆ **Coal Railcar Unloading Dust Suppression** – Bids are currently being solicited. Prebid meeting scheduled for July/Aug 05. Scheduled job completion 4<sup>th</sup> quarter 2005
- ◆ **Settled Dust Study** – Draft Protocol and procedure due to Mirant by February 18<sup>th</sup> with final copy by February 28, 2005. If no major comments to protocol/procedure are received from VA DEQ, sampling scheduled to begin April 2005 and completed Mid-June 2005.

### 5. Regulatory Inspections Conducted at the Plant

- ◆ **Water:**
  - NPDES inspection – annual – EPA reviews records and inspects all monitoring points
  - NPDES inspection – bi-annual – DC DOH reviews records and inspects all monitoring points
- ◆ **Air:**
  - Air inspection – quarterly – City reviews emissions records & maintenance on all sources
  - Air inspection – annual – VA DEQ reviews emissions records & maintenance on all sources
  - RATA – annual – Contractor conducts & DEQ observes CEM equipment accuracy test on all units
- ◆ **Miscellaneous:**
  - Pressure Vessel inspection – annual – Insurance company performs visual and record review
  - Fire System inspection – annual – Contractor performs certification testing of all fire systems
  - Fire Prevention Permit Renewal inspection – annual – City Fire Marshall inspects all areas related to storage & use of flammable, corrosive and toxic liquids and gases
  - Hazmat inspection – annual – City inspects storage & handling of hazardous materials and liquids
  - Elevators – annual – Contractor performs certification testing