COMMONWEALTH of VIRGINIA

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Secretary of Natural Resources

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Director

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June 17, 2005

Mr. David Shea
Project Manager
ENSR
2 Technology Park Drive
Westford, MA 01886

Dear Mr. Shea:

First of all, thank you for meeting the approved deadline extension for the modified Protocol for Downwash Modeling-Mirant Potomac River, LLC. I shared the extra copies of the protocol with the interested parties in Alexandria as a courtesy and received comments that have been evaluated. The comments are addressed for the most part in this letter. As to the electronic media containing the modeling files, an additional copy will be necessary for the public comment process.

The modified protocol satisfies the Department of Environmental Quality's (DEQ) original concerns with the exception of one matter concerning the receptor grid. In order for your final analysis to be accepted as complete, the predicted concentration of any receptor in the coarse grid (1-5 km) that either causes a predicted violation of the National Ambient Air Quality Standards (NAAQS) or results in the maximum concentration without exceeding the NAAQS must be remodeled in a more refined mode, i.e., 100 meter discrete receptor spacing out to 500 meters in each direction.

The most recent version of the AERMOD model along with BPIPPRM (Building Profile Input Program for PRIME) as listed in SCRAM should be used for the analysis. The most recent version is the one that will be promulgated in the near future. Also, the meteorological data referenced in the protocol is appropriate and approved for this analysis.

As stated in the original protocol letter, PM_{10} will be analyzed as a surrogate for $PM_{2.5}$ as per EPA guidance.

All agreed to emissions and stack parameters data comments (after evaluation of the outside comments and incorporation of the concurrence items into DEQ's response) have been discussed and resolved and will be addressed in your final analysis report.

As agreed to, change the 350 degree radial to 360 degrees in sector 3 of the land use map to ensure the envelopment of the Marina Towers building as per the outside commenter. Additionally, add the flagpole receptors to the north of the Marina Towers building as also described by the outside commenter. These comments were also endorsed by the other significant commenter. In addition, review the land use characteristics with respect to changing two sector sizes and addressing the land use comments.

There exists one discrepancy in your background air quality conclusions. The 24 hour value for PM_{10} should be 45 based on another monitor in Fairfax County.

The modified protocol, as further modified by a summary of items above, is approved and all modified and added requirements must be addressed in the final analysis written report as an appendix. Again, thank you for your indulgence since we have spent much time in attempting to satisfy the various comments that DEQ concurred with along with our own comments so that the finalized requirements and clarifications would be addressed in your analysis submittal that is due according to the requirements of the Consent Order.

Sincerely,

Kenneth L. McBee
Air Quality Modeler

Cc: Tamera Thompson, Director, OAPP, DEQ
Terry Darton, Air Permitting Manager, NVRO
John McKie, Air Permitting Engineer, NVRO
David Cramer, Mirant Corp
Larry Labrie, Mirant Corp