



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Agency for Toxic Substances
and Disease Registry
Region 3
1650 Arch Street, 3HS00
Philadelphia, PA 19103

October 13, 2006

Debra R. Bolton
Vice President and Assistant General Counsel
Mirant Corporation
601 13th Street, NW Suite 580N
Washington, DC 20005

Dear Ms. Bolton:

Thank you for your October 2, 2006 letter. Although many of the sources of information you submitted are already a part of our evaluation, we appreciate the effort that was involved in collecting this information. The items already under consideration include the review information from the published literature on air emissions and public health, initial air monitoring data being collected from the new monitoring stations surrounding the Mirant Potomac River Generating Facility, and the EPA and congressional correspondence about this facility.

As you know, the Agency for Toxic Substances and Disease Registry (ATSDR) is responding to a request for assistance regarding public health concerns related to emissions from the Mirant Potomac River Generating Facility. In a letter dated January 24, 2006, from Charles Konigsberg, Jr., MD, MPH, Director of the Alexandria Health Department, ATSDR was requested to review the existing air quality and other environmental data related to operations at the Mirant Potomac River Generating Station in Alexandria, Virginia. He specifically requested an assessment of the relationship of these data, including downwash studies, to past, present and future health implications for residents living in the area and any recommendations for additional appropriate studies.

This is a standard request from a health department to ATSDR. When ongoing exposures are suspected, ATSDR evaluates the available environmental and health data to determine if a public health intervention is needed to minimize any exposures. ATSDR is directed by a congressional mandate to perform health assessment activities including health assessments and consultations and provide education concerning specific hazardous substances in the environment and their effect on public health.

Our review was initiated in March 2006. ATSDR will send the Alexandria Health Department a preliminary letter consultation this fall. We are using this initial response approach, because we have identified current concerns regarding the potential for short-term exposures to sensitive populations. If requested, ATSDR will formally evaluate additional monitoring data that continues to be collected from the new monitoring stations surrounding the facility and/or address additional questions that may be raised by our preliminary letter consult.

ATSDR is conducting a thorough and methodical review of the Environmental Protection Agency (EPA), state, and local environmental monitoring and modeling information available to us. We must emphasize that our review is not limited to the information provided to us by the City of Alexandria. We continue to coordinate with EPA and the Virginia Department of Environmental Quality (VA DEQ) regarding available information for this facility relevant for potential public health exposures. For example, EPA has provided us with input files for our own air modeler to verify and explore additional potential exposure questions raised by the air modeling for this facility. Although, we are encouraged that actual air monitoring conducted from the new monitoring stations around the plant has not detected any exceedances to date, we

are cautious in interpreting this information based on the differing history of modeling results. However, please be assured that we do plan to include these actual air monitoring data in our review.

We are evaluating a broad range of scientific literature in terms of short- and long-term exposures relevant to the emissions from this facility. ATSDR considers the scientific literature strongest for short-term SO₂ exposures, which are generally described as acute exposures to human subjects in a controlled environment such as a chamber or use of a mouthpiece or facemask. Long-term exposures to human populations are described in epidemiological studies such as the work by Levy that you reference in your letter to me. Epidemiological studies cannot prove cause and effect for a contaminant, but can provide associations between a contaminant and health effects, suggesting potential causes. While experimental animal studies provide the most control of both exposure and genetic homogeneity, their exposure and responses and the relevance to human exposures and responses may not be equivalent.

ATSDR is following its established public health assessment framework, which includes an initial assessment for ongoing acute exposures at levels of public health concern. In the initial review, ATSDR has noted some environmental data gaps that need to be addressed in this case. One of these data gaps could be addressed by Mirant. If possible, we are interested in obtaining from Mirant representative actual emissions data in electronic format from the plant operating in the past and under current operating conditions that depicts the intensity, frequency and duration of short-term (i.e., subhourly) emission values. For example, we would be interested in reviewing subhourly emissions data for selected representative days while the plant was fully operational in the past and for selected representative days under current operating conditions. In our conversations with EPA Region 3, EPA Headquarters, and VA DEQ, we understand that this kind of subhourly information is not required to be submitted to regulatory authorities and therefore no entity but the facility itself might retain this information. If Mirant retains these data, we would be glad to discuss with you in more detail our specific request.

ATSDR serves the public by using the best science, taking responsive public health actions, and providing trusted health information to prevent harmful exposures and disease related exposures to toxic substances. In this capacity, ATSDR will continue to work closely with its federal, state and local partners and the Mirant Potomac River Generating Plant stakeholders to protect the environment and public health. ATSDR understands the significant work conducted already by EPA and the Department of Energy and will make certain that our activities compliment, but do not duplicate, these efforts.

Please let me know if you would like to discuss this information and our data request with you in more detail. I can be reached at 215-814-3141, or via email at lkw9@cdc.gov.

Sincerely,



Lora S. Werner, MPH
Senior Regional Representative
ATSDR Region 3

cc: Dr. Charles Konisberg, Alexandria Health Department
Dr. Tina Forrester, ATSDR DRO