



# CAPE COD COMMISSION

3225 MAIN STREET  
P.O. BOX 226  
BARNSTABLE, MA 02630  
(508) 362-3828  
FAX (508) 362-3136

E-mail: [frontdesk@capecodcommission.org](mailto:frontdesk@capecodcommission.org)

## MINOR MODIFICATION #1

**Project:** Mirant/Canal Station Power plant  
Major Modification – Aqueous Ammonia Addition  
Care/of Attorney Michael D. Ford  
72 Main Street  
P.O. Box 665  
West Harwich, MA 02671

**Date:** November 9, 2006

---

In a decision dated February 17, 2005, Mirant/Canal was granted a Major Modification by the Cape Cod Commission (Commission) to allow the Canal Station power plant to accept, handle, use and store aqueous ammonia as part of its existing air pollution control system by installing two 60,000 gallon above-ground storage tanks to hold aqueous (liquid) ammonia.

### Modifications

In a meeting on September 6, 2006, representatives of Mirant/Canal, Commission staff and the Commission's air quality consultant for the project discussed changes to the power plant. These included changes to the Selective Catalytic Reduction catalyst on Unit #1, which had significantly lowered its vanadium content. The Commission had also received a sampling and analysis report from Mirant on December 16, 2004 which showed "non detect" for vanadium, such that the "non detect" concentration level was two orders of magnitude below the Department of Environmental Protection's guidelines for such sampling from a public health perspective.

On November 6, 2006, Mirant representatives provided revised and updated sections of the project's revised ambient air quality monitoring plan as required by condition AQ4 of the February 17, 2005 Major Modification decision. Commission staff and the Commission's air quality consultant reviewed this revised monitoring plan, and have found that it is consistent with conditions AQ2 and AQ4 of the February 17, 2005 Major Modification decision.

Mirant representatives also noted at the September 6, 2006 meeting that installation of Selective Non-Catalytic Reduction (SNCR) technology was underway for Unit #2. They noted that this work was part of compliance with the Administrative Consent Order signed with the Department of Environmental Protection in December 2004. An October 24, 2006 letter from Attorney Ford describes in additional detail the SNCR



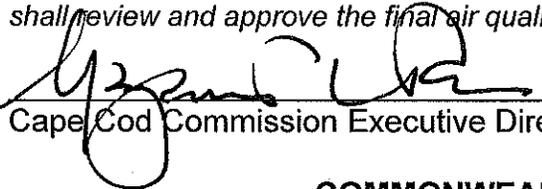
installation, which is "on a per-fabricated skid within the existing interior building space at the plant." Commission staff has reviewed this letter and find that the installation of the SNCR on Unit #2 that it describes is consistent with the February 17, 2005 Major Modification decision.

**Determination**

The Executive Director of the Commission determined that these revisions are *de minimus* changes and are approved as a Minor Modification #1.

No changes to the findings or conditions of the February 17, 2005 Major Modification decision are needed relative to the addition of SNCR to Unit #2 as described above.

The Applicant is also hereby relieved of the requirement in condition AQ2 of the 2/17/05 Major Modification decision to conduct vanadium monitoring. Condition AQ2 is modified as follows: AQ2. *Prior to issuance of a Preliminary Certificate of Compliance for Phase Two of work to install an SCR on Unit #1, the applicant shall perform an air quality modeling assessment of the pollutant emissions of the Canal facility to select the best remote, in-the-field monitoring location(s) where the maximum concentrations can be expected. Based on the air quality modeling assessment, the applicant shall prepare a draft ambient air quality-monitoring plan for review and approval by the Cape Cod Commission or its designee. The ambient air quality-monitoring program shall include the measurement of nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), ozone (O<sub>3</sub>), and inhalable particulate matter (PM-10's and PM-2.5's) and vanadium. The applicant shall be responsible for the final design, installation, and operation of the ambient air quality program. The ambient monitoring program shall meet as a minimum the DEP's approval criteria. The draft air quality-monitoring plan shall be submitted for review and approval by the Commission or its designee by January 1, 2000. Prior to issuance of a Final Certificate of Compliance for Phase Two of work to install an SCR on Unit #1, the Commission shall review and approve the final air quality modeling plan and monitoring program.*

  
Cape Cod Commission Executive Director

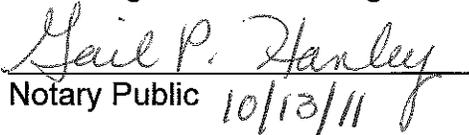
11/13/06  
Date

**COMMONWEALTH OF MASSACHUSETTS**

**Barnstable, ss**

11/13, 2006

Before me, the undersigned notary public, personally appeared Margaret L. Fenn in her capacity as Executive Director of the Cape Cod Commission, whose name is signed on the preceding document, and such person acknowledged to me that she signed such document voluntarily for its stated purpose. The identity of such person was proved to me through satisfactory evidence of identification, which was personal knowledge of the undersigned.

  
Notary Public 10/13/11