



Via Electronic and Overnight Mail

October 5, 2009

Ms. Ida McDonnell
U.S. Environmental Protection Agency - New England
One Congress Street
Suite 1100, Attn. CAP
Boston, MA 02114-2023

**Subject: Dominion Energy Brayton Point, LLC – Withdrawal of
Comment on the Draft Prevention of Significant Deterioration Permit
Application for the Unit No. 3 Dry Scrubber and Fabric Filter Project**

Dear Ms. McDonnell,

Dominion Energy Brayton Point, LLC (Dominion) submitted comments on February 27, 2009 on the Draft Prevention of Significant Deterioration (PSD) Permit Number 052-120-MA13 for the Closed Cycle Cooling and Unit No. 3 Dry Scrubber and Fabric Filter Projects, for Brayton Point Station, located in Somerset, MA.

Comment No. 2 from Dominion's February 27, 2009 letter pertained to the Unit No. 3 Dry Scrubber and Fabric Filter (DS/FF) and stated the following "2. *Section I.1.a & c- Dominion requests that the Unit #3 emission limit of 0.010 lb/MMBtu for filterable particulate matter less than 10 micrometers (PM10) and filterable particulate matter less than 2.5 micrometers (PM2.5) should contain a conditional emission limit of 0.012 lb/MMBtu. Because the filterable PM10 and PM2.5 limit of 0.010 lb/MMBtu is unique for a retrofit project of this type, there is a possibility that despite all efforts compliance may not be achievable. The potential increase in filterable PM10 and PM2.5 emission rate from 0.010 to 0.012 lb/MMBtu will have no affect on particulate NAAQS compliance. In the revised January 9, 2009 application the facility demonstrated compliance with the particulate National Ambient Air Quality Standards (NAAQS) by modeling at the total PM10 and PM2.5 emission limit of 0.025 lb/MMBtu. Based upon this NAAQS demonstration, increasing the filterable PM10 and PM2.5 emission limit to 0.012 lb/MMBtu would have no effect on the stations compliance with the particulate NAAQS.*" This letter is being sent to formally withdraw Comment No. 2 from the February 27, 2009 letter.

Even though Dominion is requesting the removal of this comment, the company would like to note that it still has concerns with the 0.010 lb/MMBtu PM10/PM2.5 emission limit and believes that comment No. 2 has merit. However, in order to expedite the effective date of the PSD permit Dominion is formally withdrawing comment No. 2 and requests that the PSD permit become effective upon signature.

If you have any questions regarding these comments, please contact Scott Lawton of Dominion Electric Environmental Services at (401) 457-9157.

Sincerely,



Cathy C. Taylor
Director, Electric Environmental Services

cc: Brendan McCahill, USEPA (Electronic Mail only)